

18th May 2020

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Highways and Environment
County Hall
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Your ref: TR010025
Our ref: A303-AFP022 Response to
SoS 18.05.2020

Dear Ms Anderson

RE: Application by Highways England for an Order granting Development Consent for the construction of a new two-lane dual carriageway for the A303 between Amesbury and Berwick Down in Wiltshire – Request for Comments and Further Information

Thank you for your letter dated 4th May requesting comments and further information on behalf of the Secretary of State for Transport with regard to the A303 Amesbury to Berwick Down road improvement scheme. Whilst it is recognised that comments were not specifically requested from Wiltshire Council, as the host authority and body to which some of the amendments specifically relate, the Council's position on the proposed changes has been detailed below.

1. OEMP, Paragraph 1.1.12 – HEMP

Wiltshire Council supports the proposed amendment to paragraph 1.1.12 of the OEMP to clarify that the consolidated version of the Handover Environmental Management Plan (HEMP) would also contain the Landscape Environmental Management Plan (LEMP).

2. OEMP, PW-LAN1 – ES Chapter 7, Section 7.8 Retained Vegetation

The Council welcomes this proposed amendment to PW-LAN1 in Table 3.2a of the OEMP to clarify that the fencing of retained trees and other vegetation may be subject to Site Specific Written Schemes of Investigation (SSWSIs) and Method Statements (MSs) if deemed necessary by Wiltshire Council to protect archaeological remains.

3. OEMP, PW-GEO3 – Soils Management Strategy

Wiltshire Council is supportive of the proposed amendment to PW-GEO3 in Table 3.2a of the OEMP. The Council agrees that this would be the preferred approach is adopted for both the preliminary and main works.

4. OEMP, MW-G5 – Preparation of a CEMP

The Council welcomes the amendments proposed to ensure that the reporting criteria in MW-G5 reflects those in PW-G1 regarding the Council's approval of the Heritage Management Plans (HMPs), SSWSIs and MSs.

5. OEMP, MW-G11 – Handover Environmental Management Plan

Wiltshire Council supports the proposed amendments to the reporting criteria in MW-G11 to reflect the Council's approval responsibilities for archaeological matters.

6. OEMP, MW-CH8 – Ground Movement Monitoring Strategy

The Council notes the proposal for the trigger levels within the Ground Movement Monitoring Strategy (GMMS) to be subject to the approval of Wiltshire Council.

During the Examination, one of the Council's primary concerns was the approval of key documentation by Highways England. The Council is pleased that as a result of negotiations between stakeholders, it has been agreed that key documentation would be subject to the approval of the Secretary of State, following consultation with the key stakeholders. The Council considers that this provides the necessary independent oversight to ensure that Highways England is not the producer and approver for the various plans, strategies and method statements which will be required should this scheme be consented. As such, the Council is content for the GMMS to be approved by the Secretary of State following consultation with Wiltshire Council, Historic England and the members of HMAG.

The Council considers ground movement monitoring for archaeological assets as quite a specialist area, due to monitoring normally being undertaken to minimise the effect on buildings or people, which would obviously be subject to different trigger levels due to the nature of their construction or impact. Wiltshire Council is therefore intending to appoint a specialist contractor to advise the Council on the appropriate trigger levels for heritage assets and corresponding monitoring regime. This advice would be reflected within the Council's consultation response on the GMMS and form a key consideration during its approval of the relevant sections within the Heritage Management Plans.

7. OEMP, D-LAN4 – Stakeholder Engagement

Wiltshire Council is supportive of the proposed amendments to D-LAN4 to ensure the Council is consulted on the general appearance and finishes of Countess Flyover.

8. DAMS, para 5.2.8 – Ground movement monitoring stations

Please see the Council's response to item 6 above.

9. [REDACTED] graph 6.3.16 – Ploughzone Sampling

1. [REDACTED] graph 6.3.51 – Tree Hollows

Wiltshire Council notes the proposed amendments to paragraphs 6.3.16 and 6.3.51 of the DAMS.

The Council recognises the valuable role that the Scientific Committee has made to date in relation to the scheme, and the benefit of continuing that role over the coming months if the scheme is consented. The proposed amendments seek to further secure the role of the Committee within the DAMS approval process in relation to archaeological sampling. However, the Council foresees difficulties with implementing the exact proposed amendments to the DAMS for several reasons; one of which is that the Committee expresses a wide range of views from individual members and in line with the agreed terms of reference of the Committee, a consensus view is not sought or presented. It is also worth noting that the members of HMAG are also members of the Scientific Committee.

Following the close of the Examination, Wiltshire Council and other key stakeholders have been in discussions with Highways England and the Chair of the Scientific Committee regarding the intention to hold a series of specialist archaeological workshops at which the detailed strategies for sampling will be discussed and agreed. These workshops would be held after the archaeological contractor has been appointed and will be attended by members of the Committee, enabling their input and views to be captured. A record of the views and discussions would be made available on-line and will be considered in the final development and approval of the SSWSIs.

Wiltshire Council contends that the series of workshops proposed (as outlined above) would secure the valuable input from the Scientific Committee regarding detailed sampling issues. Therefore, the Council respectfully suggests that if the Secretary of State wished to secure the Scientific Committee's participation formally within the documentation, that this workshop approach was reflected in the DAMS rather than the wording originally proposed within points 9 and 10. This would ensure that the difficulties Wiltshire Council foresees in trying to implement the originally proposed amendments in practice would be overcome.

11. Stone Curley Breeding Plots DCO Requirement

The Council welcomes the amendments to the proposed requirement and concurs that the proposed wording reflects current best practice thinking on the drafting of conditions to ensure that the tests of necessity, relevance, enforceability and precision can be satisfied.

I trust that the information above is helpful to confirm Wiltshire Council's position on the proposed amendments by the Secretary of State. However, if you require any further information, please do not hesitate to contact me.

Yours sincerely,



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