

A303 Amesbury to Berwick Down

Statement of Matters issued 30 November 2021:
Applicant's response to the matters on which the Secretary of
State invites further representations (Paragraph 2)

Response to Bullet Point One – Alternatives

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1 Purpose of this document

- 1.1.1 The Secretary of State for Transport (SoS) has requested further representations from National Highways (the Applicant) on certain matters for the purposes of his re-determination of the application. This document deals with the request for further representations on the following: *“Any updates Interested Parties consider to be material to the information relating to alternatives considered by the Examining Authority in section 5.4 of their report (including the relative merits of a longer tunnel option); and any further information that Interested Parties consider to be material for the Secretary of State to take into account in his re-determination of the application relating to the relative merits of alternatives to the Development”*.
- 1.1.2 The rest of this part of the response to the Statement of Matters is separated into the following sections:
- Section 2: A summary of the information the Applicant has previously put before the Examining Authority (ExA) that has content focused on the consideration of alternatives, finishing with reference to the Applicant’s Closing Submission
 - Sections 3-8: Review of information and any updates pertaining to the specific alternative routes discussed at examination
 - Section 9: Our conclusion on alternatives

2 Information previously put before the Examining Authority

2.1 Key Documents

2.1.1 The alternatives considered in the application and at examination, as referenced in the ExA's report, have been generated over a long period of Scheme development, assessment, stakeholder engagement and consultation. They therefore include all known alternatives identified by the Applicant and Interested Parties, to the Applicant's knowledge. The process of option identification and selection, as outlined in the following sections of this report, including the consideration of alternatives, has been comprehensive and robust.

2.1.2 Key documents relating to the option identification and selection process in general, rather than to specific alternatives, are summarised below along with a brief summary of the purpose of and content of each document. Documents / parts of documents with a focus on specific alternatives are dealt with in Sections 3 to 8 of this document.

2.2 Case for the Scheme and NPS Accordance

2.2.1 Chapter 3 of the Case for the Scheme and NPS Accordance document [APP-294] includes a brief chronology of the development of the Scheme, the options considered and the selection process that led to the design of the Scheme. It summarises the iterative option identification and selection process, which started with over 60 route options and ultimately identified the Scheme as the optimum solution. The process comprised the following steps. These steps are referred to later in this submission to identify the point in the Scheme's lifecycle covered by the information previously submitted to the ExA:

- Step 1 - Identifying the route corridors
- Step 2 - Assessing route corridor options
- Step 3 - Developing route options
- Step 4 - Assessing route options
- Step 5 - Consulting on the route options
- Step 6 - Determining the Preferred Route
- Step 7 - Developing the Proposed Scheme

2.3 Technical Appraisal Report (TAR)

2.3.1 Volume 1 of the Technical Appraisal Report (TAR) [REP1-031] documents the route selection work completed prior to the non-statutory consultation

held in 2017. The TAR along with its appendices was submitted to the examination as documents REP1-031 – REP1-038. It covers Steps 1 to 4 of the process described in the Case for the Scheme:

- 2.3.2 Step 1: All 60 initial route options were grouped into seven corridors ranging from Corridor A (north of the World Heritage Site (WHS)) to Corridor G (south of Salisbury). A plan showing the corridors is included in the TAR as Appendix B.2 [[REP1-033](#)].
- 2.3.3 Step 2: At the point of Design Fix A, a multi-criteria assessment of eight corridors was carried out to select certain corridors that merited taking forward for further, more detailed, consideration. The assessment and appraisal methodology at this stage used the following three criteria:
- The Scheme's Client Scheme Requirements (The Department for Transport (DfT) brief set for development of the Scheme). The Client Scheme Requirements cover a high-level definition of the transport challenges and issues, objectives, project outputs and value for the scheme.
 - DfT's Web-based Transport Appraisal Guidance's (WebTAG) Early Assessment and Sifting Tool (EAST).
 - The National Policy Statement for National Networks (NPSNN) environmental aspects.
- 2.3.4 Using the above criteria, Corridor D (partially tunnelled routes through the WHS), Corridor F (north) (surface routes south of the A303, outside the WHS, and north of Salisbury), and Corridor F (south) (surface routes further south of the A303, outside the WHS, and north of Salisbury) were taken forward for the development of route options. This decision is covered in the TAR's Chapter 5.
- 2.3.5 Steps 3 and 4: Ten route options in the preferred corridors were assessed and the best performing options were further optimised. Two partially tunnelled routes in Corridor D (known as D061 and D062) and one surface route in Corridor F (known as F010) were selected for further development. Details of this step can be found in the TAR's chapters 6, 7 and 8 and in the following TAR appendices:
- Appendix C - Development of route options within preferred corridors (route option drawings) [[REP1-034](#)]
 - Appendix D - Initial Route Option Assessment [[REP1-035](#)].
 - Appendix E - Route Options for further appraisal (Route option drawings. Options D061, D062 and F010 are shown superimposed on a single plan at Appendix E.3) [[REP1-036](#)]
 - Appendix F - Description of route options for further appraisal (Larger scale drawings of options D061, D062 and F010) [[REP1-037](#)]

- 2.3.6 Further appraisal (see TAR chapters 9 to 20 and TAR Appendices G and H [[REP1-038](#)]) showed that the surface route, F010, would have a much larger footprint and a greater overall environmental impact than the partially tunnelled options. The surface route would also leave higher levels of rat-running traffic adversely affecting the quality of life in local communities.
- 2.3.7 Consequently only the two partially tunnelled routes, with a bypass to either the north (D061) or south (D062) of Winterbourne Stoke, were selected for further development. The two routes were renamed 1N and 1S and were taken to non-statutory consultation in January to March 2017.
- 2.3.8 The non-statutory consultation formed step 5 of the option identification and selection process. It is documented in the Consultation Report [[APP-026](#)] :
- Section 2.4 records the stakeholder engagement in 2015-2016 taken to support the options appraisal process.
 - Section 2.5 documents Step 5 of the option identification and selection process. This was a non-statutory consultation held from January to March 2017. This consultation was based on the two routes selected at Step 4, which were published as Option 1N and Option 1S respectively.

2.4 Scheme Assessment Report

- 2.4.1 The Scheme Assessment Report (SAR) [[REP1-023](#)] documents Steps 5 and 6 of the option identification and selection process. The SAR along with its appendices was submitted to the examination as documents REP1-023 – REP1-030.
- 2.4.2 The feedback from Step 5, and the recommendations of the joint World Heritage Centre / International Council on Monuments and Sites (ICOMOS) advisory missions were used to inform seven route modifications to routes 1N and 1S. These modifications included different locations of the western portal and the approach road. For details of these modifications see the SAR's Section 6.2.6 and plan drawings in SAR Appendix C1 [[REP1-026](#)].
- 2.4.3 A high-level assessment (see SAR Section 6.3) was used to identify the three best performing of these seven options. Drawings of the three selected routes are in SAR Appendix C.2 [[REP1-027](#)]
- 2.4.4 A detailed assessment was then carried out on these three options (SAR Chapters 7 to 16) which identified route 1Nd as the preferred route. A summary of the reasons for this choice is included in SAR section 17.1.2.

2.5 Preferred Route Announcement

- 2.5.1 The Preferred Route Announcement (PRA) was made on 12 September 2017 based on route option 1Nd (see SAR Section 17.1). In summary, the PRA included a 2.9km long twin bored tunnel, with the western portal located south of the existing A303 and northwest of Normanton Gorse, and the eastern portal to the north of the A303 and east of the Avenue.

- 2.5.2 Details of the preferred route were publicised on the project website and via social media. For details refer to Consultation Report section 2.6 [APP-026]. A booklet, “Moving forward – the preferred route” was published which explains the choice of preferred route and how it was influenced by the findings of the consultation. It is available at: <https://highwaysengland.citizenspace.com/cip/a303-stonehenge/> [Click Here]

2.6 Consultation Report

- 2.6.1 The Consultation Report [APP-026] documents the statutory consultation held on the Preferred Route during February to April 2018, prior to the DCO application. The principal purpose of the consultation was to seek the views of statutory consultees, the local community and other interested groups and individuals on the scheme proposals which had been developed following the preferred route announcement in September 2017. The consultation also sought feedback on the preliminary environmental information which had been compiled for the scheme.
- 2.6.2 Full details of the scheme proposals put forward for statutory consultation can be found in A303 Stonehenge: Amesbury to Berwick Down, Public Consultation Booklet, February 2018. A copy of this document can be found in Appendix G1 of the Consultation Report [APP-033].
- 2.6.3 During the consultation, the Applicant specifically sought feedback on various design options. These are listed in section 3.2.7 of the Consultation Report. The Applicant’s response to feedback on these options and other matters raised at consultation is included in chapter 5 of the consultation report.

2.7 Environmental Statement Chapter 3

- 2.7.1 The Environmental Statement (ES) Chapter 3, Assessment of Alternatives, [APP-041] covers the following areas:
- Section 3.1: Scheme History
 - Section 3.2: Selection of the Scheme (a summary of Steps 1-6 above)
 - Section 3.3: Scheme Development (Step 7 of the option identification and selection process)
 - Section 3.4: Construction Options
- 2.7.2 The options considered in Section 3.3 include the various options presented at public consultation in February to April 2018 and at supplementary consultation in July to August 2018, as well as various design development options identified by the design team. These design developments are listed in ES Chapter 3, Section 3.3.19.
- 2.7.3 Also considered at this stage, in response to feedback from ICOMOS, were two options to extend the tunnel, either as a cut and cover tunnel to the western boundary of the WHS, or as a bored tunnel for a further 600m

beyond the WHS boundary. This is outlined in paragraph 3.3.61 of ES Chapter 3.

2.8 Design and Access Statement

2.8.1 The Design and Access Statement [[APP-295](#)] summarises the design policy context and design principles of the Scheme. It sets out how the Scheme has evolved through working with stakeholders, including design changes that have emerged from consultation processes. The statement then presents the Scheme in design and access terms, demonstrating how the high-quality design solution responds to the opportunities and meets the design challenges presented by the site and its setting.

2.8.2 Paragraph 2.1.5 of the Response to Bullet Point 2 – Policy (Redetermination 1.2) addresses how the Scheme complies with the updated National Planning Policy Framework (NPPF, 2021) in relation to encouraging good design.

2.9 Response to First Written Questions: Alternatives (AL.1)

2.9.1 The Applicant's response to the ExA's First Written Questions [[REP2-024](#)] provides answers to questions from the ExA on specific alternatives as well as on the option identification and selection process in general. Some of the questions relating to specific alternatives are covered in Sections 3 to 8 of this document.

2.10 Response to First Written Questions: Alternatives (AL.2)

2.10.1 The Applicant's response to the ExA's Second Written Questions [[REP6-021](#)] provides further clarification on costings for the longer tunnel route options.

2.11 Closing Submission

2.11.1 Section 2 (starting at page 8) of the Applicant's Closing Statement [[AS-146](#)] provides a signposted summary of the issues raised during Examination relating to alternatives.

3 Cut and Cover Tunnel Extension to WHS Boundary

3.1 Background

- 3.1.1 Two tunnel extension options, one in cut and cover construction and the other in twin bored tunnel, were considered during the development of the Proposed Scheme (Stage 7 of the option identification and selection process) and in response to feedback received from ICOMOS.
- 3.1.2 The cut and cover option would see an extension of the tunnel to the western boundary of the WHS which would add 1.0km to the length of the proposed tunnel bringing the total tunnel length to 4.285km.
- 3.1.3 The twin bored option would see an extension of the bored tunnel to a point about 600m beyond the western boundary of the WHS which would add 1.6km to the length of the proposed tunnel bringing the total tunnel length to 4.885km and is covered in Section 4 of this document.

3.2 Applicant's Position at Examination

- 3.2.1 The Applicant's position on the longer tunnel options (including the cut and cover extension) is documented in response to First Written Question AL.1.29 [[REP2-024](#)].
- 3.2.2 The response to AL.1.29 discusses the benefits and disbenefits, in comparison with the Proposed Scheme, of the cut and cover extension in terms of:
- Traffic and Operational issues
 - Construction and Civil Engineering Issues
 - Mechanical and Electrical Issues
 - Heritage Issues
 - Environmental Issues
 - Programme and Cost
- 3.2.3 A summary of the Applicant's position on the cut and cover tunnel extension at the time of the DCO examination on each of these topics is included below starting at Section 3.2.7
- 3.2.4 The Applicant notes that this option would not avoid all adverse impacts on attributes that convey the WHS's Outstanding Universal Value (OUV), integrity and authenticity.
- 3.2.5 The Applicant concludes in a summary for the cut and cover tunnel extension that: "The locations of the eastern and western portals in the proposed Scheme have been identified as the optimum locations when all environmental, technical and economic considerations are taken into account. There is no evidence that the additional investment required to

extend the tunnel length would deliver meaningful additional benefits to the WHS that would justify the additional cost.”

3.2.6 Other responses to First Written Questions [REP2-024] relating to longer tunnel options include:

- AL.1.6 Rejection of long tunnel options in Corridor D
- AL.1.27 Position of the Eastern Portal
- AL.1.30 Cost and construction period for longer tunnel options
- AL.1.31 Historic cost estimate for longer bored tunnel
- AL.1.32 Historic cost estimate for longer cut and cover tunnel

3.2.7 An eastern extension of the tunnel was not described in response to Written Question AL.1.29 because no viable option has been identified for any change to the portal location identified in the Preferred Route Announcement. This view was supported by the WHC/ICOMOS advisory mission in March 2018 [REP1-008]: “*The Mission therefore considers that eastern portal has been positioned in the least impactful location available and close to the WHS boundary, given the constraints imposed by the attributes of the WHS, other significant sites in the vicinity (including Vespasian’s Camp and Blick Mead) and local topographic and environmental conditions*”. This reasoning was explained in a document titled “Comments on any further information received by the ExA and received to Deadline 8” [REP9-022].

3.2.8 The following paragraphs present a summary of the Applicant’s position at the time of the DCO examination on each of the topics listed in section 3.2.2 above.

Traffic and Operational issues

3.2.9 The cut and cover extension would reduce the distance between Longbarrow Junction and the tunnel portal. This would result in disruption to smooth traffic flow close to the tunnel portal and increase the risk of collisions and incidents in this area.

Construction and Civil Engineering Issues

3.2.10 A tunnel length of 4.285km would require inclusion of lay-bys in the tunnel. Construction of these features would require long break-outs from the bored tunnel’s primary structural lining which is a high safety risk operation for construction workers.

Mechanical and Electrical Issues

3.2.11 The additional tunnel length would require a proportional increase in mechanical and electrical plant to enable safe operation. Additional tunnel plant rooms would be required.

- 3.2.12 Tunnel Service buildings would need to be relocated, either within the new Longbarrow junction or adjacent to the A360.

Heritage Issues

- 3.2.13 The cut and cover extension would have the same construction footprint in the WHS as the Proposed Scheme, so the impacts on Attribute 2 (the physical remains of the Neolithic and Bronze Age ceremonial and funerary monuments and associated sites) that conveys the OUV of the WHS would remain the same as the Scheme.
- 3.2.14 When compared with the Proposed Scheme, the cut and cover extension would provide connectivity between key assets and would allow re-establishment of the existing landform in the WHS benefiting Attribute 5 (The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to each other) in the western approach road and western portal area.
- 3.2.15 The cut and cover extension would not change the eastern portal and associated approach roads construction, so the impact on Attribute 2 and Attribute 5 at this location remains as per the Scheme.
- 3.2.16 Overall the heritage benefit of the cut and cover option was assessed as slightly more beneficial than the Scheme as impacts still remain on Attribute 2 (in the western portal approaches and at the eastern portal) and on Attribute 5 (at the eastern portal, as the cutting and approach to the eastern portal entrance remain the same as the Scheme).

Environmental Issues

- 3.2.17 The cut and cover extension would offer overall minor beneficial impacts when compared to the Proposed Scheme that would be limited to, Landscape and Visual, Biodiversity and Public Amenity, all in the western section of the WHS.

Programme and Cost

- 3.2.18 The cut and cover option would take an additional 12 months to construct and was estimated to cost an additional £264 million over the Proposed Scheme. This estimate includes for Construction and for 60 years of Operation and Maintenance.

3.3 Updates / further information since the Applicant's last submissions

Traffic and Operational issues

- 3.3.1 Since the DCO Application, as set out in Appendix 1.1: Transport Assessment Review of the Environmental Information Review [Redetermination 1.4.1], the assumed electrification of the vehicle fleet and consequential reduction in vehicle operating cost (amongst other changes) has resulted in traffic forecasts along the A303 increasing by about 10%.

This would increase traffic flows at the merge between Longbarrow sliproads and the A303, which would further increase the risk of collisions and incidents in this area.

Construction and Civil Engineering Issues

- 3.3.2 Since examination, a safety risk assessment has been carried out on the need for emergency stopping areas in tunnels. This assessment has concluded that laybys do not provide a proportionate response to managing the residual risk associated with vehicle breakdowns in the tunnel and so the likelihood of long break-outs being required in the primary tunnel lining as set out in paragraph 3.2.10 above has reduced.

Mechanical and Electrical Issues

- 3.3.3 There have been no changes which impact the Applicant's position regarding the requirement for additional mechanical and electrical plant to enable safe operation of a longer tunnel.

Heritage Issues

- 3.3.4 The baseline for the western approach road and western portal areas has not changed since the previous assessment for the cut and cover extension was undertaken (see Response to Bullet Point Four – Environmental Information Review [Redetermination 1.4]). As a result there is no change in the assessment of the cut and cover extension due to a change in the baseline. Similarly, no change in policy, methodology, guidance and environmental information (see Response to Bullet Point Four – Environmental Information Review [Redetermination 1.4]) has resulted in any change to the assessment previously undertaken.

Environmental Issues

- 3.3.5 There have been some changes to policy, methodology, guidance, and environmental information since examination. These are set out within the Response to Bullet Point Four – Environmental Information Review (Redetermination 1.4) and in Table 1 of the Response to Bullet Point Two - Policy (Redetermination 1.2). Section 12 'Assessment of Alternatives' within the Response to Bullet Point Four – Environmental Information Review (Redetermination 1.4) considers the applicability of the conclusions regarding the assessment of alternative options. In respect of the cut and cover tunnel extension there have been no changes to policy, methodology, guidance, assessment of effects or the environmental baseline which change the conclusions set out in response to AL1.29. As stated in the AL1.29 response there would be overall minor beneficial impacts when compared to the Scheme that would be limited to, Landscape and Visual, Biodiversity and Public Amenity.

Programme and Cost

- 3.3.6 Programme: There has been a delay to the proposed date for start of construction. However, the assessment of the Proposed Scheme and of the tunnel extension options is based on construction duration rather than on construction dates. There have been no changes which impact construction duration.
- 3.3.7 Cost: The delay to the proposed start of construction will result in inflationary cost increases but the magnitude of these increases combined with changes in market conditions are within estimating variance margins and therefore the estimate of additional cost presented at examination remains valid.

3.4 Impact of updates / further information on the Applicant's position

Traffic and Operational issues

- 3.4.1 The increased risk of collision and incidents is not of such magnitude as to change the previous assessment of the cut and cover option.

Construction and Civil Engineering Issues

- 3.4.2 The reduced likelihood of long break-outs being required in the primary tunnel lining means that Construction and Engineering issues are no longer a reason to exclude this option from further development.

Mechanical and Electrical Issues

- 3.4.3 There are no changes to the Applicant's position relating to Mechanical and Electrical issues.

Heritage Issues

- 3.4.4 There are no changes to the Applicant's position relating to Heritage issues.

Environmental Issues

- 3.4.5 There are no changes to the Applicant's position relating to Environmental issues.

Programme and Cost

- 3.4.6 There are no changes to the Applicant's position relating to Programme and Cost.

Overall Position

- 3.4.7 The change in circumstances since the decision to exclude a cut and cover tunnel extension from further development are:

- Increased traffic forecasts would increase the risk of collisions and incidents associated with the proximity of Longbarrow junction slip roads to the relocated west portal; and
- Reduced likelihood of long break-outs being required in the primary tunnel lining.

3.4.8 The Applicant's overall position to exclude the cut and cover tunnel extension from further development remains unchanged; there is no evidence that the additional investment required to extend the tunnel length would deliver meaningful additional benefits to the WHS that would justify the additional cost.

4 Bored Tunnel Extension to 600m beyond WHS boundary

4.1 Background

4.1.1 The second of the two tunnel extension options is the twin bored tunnel extension. This option would see an extension of the bored tunnel to a point about 600m beyond the western boundary of the WHS which would add 1.6km to the length of the proposed tunnel bringing the total tunnel length to 4.885km.

4.2 Applicant's Position at Examination

4.2.1 The Applicant's position on the longer tunnel options (including the bored tunnel extension) is documented in response to First Written Question AL.1.29 [[REP2-024](#)].

4.2.2 The response to AL.1.29 discusses the benefits and disbenefits, in comparison with the Proposed Scheme, of the bored tunnel extension in terms of:

- Traffic and Operational issues
- Construction and Civil Engineering Issues
- Mechanical and Electrical Issues
- Heritage Issues
- Environmental Issues
- Programme and Cost

4.2.3 A summary of the Applicant's position on the bored tunnel extension at the time of the DCO examination on each of these topics is included below starting at Section 4.2.9

- 4.2.4 The Applicant notes that this option would not avoid all adverse impacts on attributes that convey the WHS's Outstanding Universal Value (OUV), integrity and authenticity.
- 4.2.5 The Applicant concludes in AL.1.29 in a summary for the bored tunnel extension that: "The locations of the eastern and western portals in the proposed Scheme have been identified as the optimum locations when all environmental, technical and economic considerations are taken into account. There is no evidence that the additional investment required to extend the tunnel length would deliver meaningful additional benefits to the WHS that would justify the additional cost."
- 4.2.6 Other written questions relating to longer tunnel options are listed in Section 3.2.6 above.
- 4.2.7 The Applicant's position relating to an eastern portal for this option is the same as for the option of cut and cover extension. See Section 3.2.7 above.
- 4.2.8 The following paragraphs present a summary of the Applicant's position at the time of the DCO examination on each of the topics listed in Section 4.2.2 above.

Traffic and Operational issues

- 4.2.9 The bored tunnel extension would reduce the distance between Longbarrow Junction and the tunnel portal. This would result in disruption to smooth traffic flow close to the tunnel portal and increase the risk of collisions and incidents in this area.
- 4.2.10 In addition to this, the longer bored tunnel extension would need Longbarrow junction to be relocated to the west. This relocated Longbarrow junction would need to fit between the western portal and the River Till Viaduct. The combination of these two constraints would require the use of a compact, and consequently lower capacity, junction which would not be compliant with standards for the volumes of traffic which would be using the A303.
- 4.2.11 The A360 would need to remain in its current location.
- 4.2.12 The revised junction position and arrangement would increase journey times and displace more traffic on to the local road network.

Construction and Civil Engineering Issues

- 4.2.13 A tunnel length of 4.885km would require inclusion of lay-bys and a vehicular cross-over in the tunnel. Construction of these features would require long break-outs from the bored tunnel's primary lining which is a high safety risk operation for construction workers.
- 4.2.14 The bored tunnel extension would generate more tunnel arisings for processing and placement.

Mechanical and Electrical Issues

- 4.2.15 The additional tunnel length would require a proportional increase in mechanical and electrical plant to enable safe operation. Additional tunnel plant rooms would be required.
- 4.2.16 Tunnel Service buildings would need to be relocated, either in the vicinity of the new Longbarrow junction or adjacent to the A360.

Heritage Issues

- 4.2.17 The bored tunnel extension would minimise ground disturbance in the WHS benefitting Attribute 2 (the physical remains of the Neolithic and Bronze Age ceremonial and funerary monuments and associated sites) that conveys the OUV of the WHS in the western approach road and western portal area.
- 4.2.18 When compared with the Proposed Scheme, the bored tunnel extension would provide connectivity between key assets and would allow retention of the existing landform in the WHS benefitting Attribute 5 (The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to each other), in the western approach road and western portal area.
- 4.2.19 Relocation of Longbarrow junction for the bored tunnel extension would leave the A360 in its current position. This would remove the benefit to the WHS of removing traffic immediately beside the Winterbourne Stoke Crossroads Barrow Group. The existing proximity of the A360 to this Barrow group has an adverse impact on Attribute 3 (The siting of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the landscape) and on Attribute 5.
- 4.2.20 The bored tunnel extension would not change the eastern portal, so the impacts on Attribute 2 and Attribute 5 at this location remain as per the Scheme.
- 4.2.21 Overall, this option would not avoid all impacts on Attributes that convey the OUV of the WHS. Although archaeological remains would be preserved within the WHS in the western approaches (benefiting Attribute 2) and the landform would be retained in this location (benefiting Attribute 5), construction of the cutting would still remove archaeological remains at the eastern portal resulting in adverse impacts to Attributes 2 and 5 in this part of the WHS. The retention of the A360 on its existing alignment would also continue the adverse impacts of the surface A360 on AG12 Winterbourne Stoke Crossroads Barrows, retaining existing adverse impacts on Attributes 3 and 5 that convey the OUV of the WHS. Overall, therefore, this option is assessed as slightly more beneficial than the Scheme.

Environmental Issues

- 4.2.22 The bored tunnel extension compared to the Proposed Scheme would offer overall minor beneficial impacts that would be limited to, Landscape and

Visual, Biodiversity and Public Amenity all in the western section of the WHS. There would also be potential for worsened landscape and visual impacts from the repositioning of Longbarrow junction.

Programme and Cost

- 4.2.23 The bored tunnel extension option would take an additional 24 months to construct and would cost an additional £578 million over the Proposed Scheme. This estimate includes for Construction and for 60 years of Operation and Maintenance.

4.3 Updates / further information since the Applicant's last submissions

Traffic and Operational issues

- 4.3.1 Traffic forecasts for the A303 have increased by about 10%. This will increase merging traffic flows at junctions which will increase the operational risks associated with the proximity of Longbarrow Junction slip roads to the relocated west portal.
- 4.3.2 The increased traffic flows would make the compact junction more non-compliant with standards. The Design Manual for Roads and Bridges (DMRB) includes the requirement that "compact grade separated junctions should not be used on dual and single carriageway roads when mainline flows are above 30,000 AADT", (See CD122 "Geometric design of grade separated junctions", paragraph 2.2.1). The latest post DCO design year traffic flow forecast on the A303 east of Longbarrow is approximately 50,000. Appendix 1.1: Transport Assessment Review of the Environmental Information Review discusses the changes to key modelling assumptions since the submission of the DCO Transport Assessment, which inform the current forecast
- 4.3.3 The increased traffic flows combined with the revised junction position and arrangement would increase journey times and displace more traffic on to the local road network.

Construction and Civil Engineering Issues

- 4.3.4 Since examination, a safety risk assessment has been carried out on the need for emergency stopping areas in tunnels. This assessment has concluded that the likelihood of long break-outs being required in the primary tunnel lining has reduced.

Mechanical and Electrical Issues

- 4.3.5 There have been no changes which impact the Applicant's position regarding the requirement for additional mechanical and electrical plant to enable safe operation of a longer tunnel.

Heritage Issues

- 4.3.6 The cultural heritage baseline for the western approach road and western portal areas has not changed since the assessment for the bored tunnel extension was undertaken (see Response to Bullet Point Four – Environmental Information Review [Redetermination 1.4]). As a result there is no change in the assessment of the bored tunnel extension due to a change in the baseline. Similarly, no change in policy, methodology, guidance and environmental information (see Response to Bullet Point Four – Environmental Information Review [Redetermination 1.4]) has resulted in any change to the assessment previously undertaken.

Environmental Issues

- 4.3.7 There have been some changes to policy, methodology, guidance, and environmental information changes since examination. These are set out within the Response to Bullet Point Four – Environmental Information Review (Redetermination 1.4) and in Table 1 of the Response to Bullet Point Two - Policy (Redetermination 1.2). Section 12 ‘Assessment of Alternatives’ within the Response to Bullet Point Four – Environmental Information Review (Redetermination 1.4) considers the applicability of the conclusions regarding the assessment of alternative options. In respect of the bored tunnel extension there have been no changes to policy, methodology, guidance, assessment of effects or the environmental baseline which change the conclusions set out in response to AL1.29. As stated in the AL1.29 response there would be overall minor beneficial impacts when compared to the Scheme that would be limited to, Landscape and Visual, Biodiversity and Public Amenity. There would also be potential for worsened landscape and visual impacts from the repositioning of Longbarrow junction.

Programme and Cost

- 4.3.8 Programme: There has been a delay to the proposed date for start of construction. However, the assessment of the Proposed Scheme and of the tunnel extension options is based on construction duration rather than on construction dates. There have been no changes which impact construction duration.
- 4.3.9 Cost: The delay to the proposed start of construction will result in inflationary cost increases but the magnitude of these increases combined with changes in market conditions are within estimating variance margins and therefore the estimate of additional cost presented at examination remains valid.

4.4 Impact of updates / further information on the Applicant’s position

Traffic and Operational issues

- 4.4.1 Increased traffic forecasts have increased the risk of collisions and incidents associated with the proximity of Longbarrow Junction sliproads to the relocated west portal.

4.4.2 The increased traffic flows combined with the revised junction position and compact junction arrangement would increase journey times and displace more traffic on to the local road network.

4.4.3 Increased traffic flows would make the compact junction more non-compliant with standards which, when combined with the increased risk of collisions and incidents in this area, means that National Highways (the Applicant) would not support the construction of the compact junction arrangement.

4.4.4 The increase in traffic forecasts and the associated increase in non-compliance with standards of the compact junction, strengthens the Applicant's existing position that the option for a bored tunnel extension should be excluded from further development.

Construction and Civil Engineering Issues

4.4.5 The reduced likelihood of long break-outs being required in the primary tunnel lining means that Construction and Engineering issues are no longer a reason to exclude this option from further development.

Mechanical and Electrical Issues

4.4.6 There are no changes to the Applicant's position relating to Mechanical and Electrical issues.

Heritage Issues

4.4.7 There are no changes to the Applicant's position relating to Heritage issues.

Environmental Issues

4.4.8 There are no changes to the Applicant's position relating to Environmental issues.

Programme and Cost

4.4.9 There are no changes to the Applicant's position relating to Programme and Cost.

Overall Position

4.4.10 The change in circumstances since the decision to exclude a bored tunnel extension from further development are:

- Increased traffic flows on the A303 and the local road network.
- Reduced likelihood of long break-outs being required in the primary tunnel lining.
- Increased non-compliance with standards of a compact junction.

4.4.11 The Applicant's overall position remains unchanged: that this option should be excluded from further development. There is no evidence that the

additional investment required to extend the tunnel length would deliver meaningful additional benefits to the WHS that would justify the additional cost. In this respect, the Applicant's overall position remains unchanged.

- 4.4.12 The location of the tunnel portal would require Longbarrow junction to be relocated to the west and to be changed to a compact, lower capacity junction not compliant with the design standards. Traffic forecasts since the previous assessment have further strengthened the Applicant's reasons for dismissing this option on traffic and operational grounds.

5 F010 Surface route option to the south

5.1 Background

- 5.1.1 Route Option F010 refers to a surface route option to the south of the WHS. This route was identified by the Applicant during Steps 1-4 of the route option identification and selection process. See Sections 2.2 and 2.3.
- 5.1.2 The western end of Route F010 runs between Winterbourne Stoke and Berwick St. James. The route then continues east, keeping to the south of the WHS boundary but north of Upper Woodford before running south of the Boscombe Down Airfield. It then turns north to reconnect with the existing A303 east of Amesbury. See section 6.5.1 of the TAR [REP1-031]. Drawings showing the route are included in Appendix E.3 of the TAR [REP1-036] and at a larger scale in Appendix F.3 of the TAR [REP1-037].

5.2 Applicant's Position / Reason not to progress the alternative

- 5.2.1 Route F010 was rejected at Step 4 of the option identification and selection process, in favour of two tunnelled options known as D061 and D062. It was not taken forward to public consultation.
- 5.2.2 Key differentiators were F010 being a significantly longer route which would pass through a largely unspoilt, high quality, tranquil landscape with an additional crossing of the River Avon Special Area of Conservation (SAC). It would have a much larger footprint and a greater overall environmental impact, despite having greater benefits for the WHS. There would be disbenefits for road users having to travel on a longer F010 route, offsetting lower construction costs. F010 would also not interact effectively with the local road network, leaving higher levels of rat running traffic adversely affecting the quality of life in local communities. This summary can be found in paragraph 4.6.2 of the SAR [REP1-023] and is included in the entry for Options Identification, Stage 4 in Table 3.1 of ES Chapter 3 [APP-041].
- 5.2.3 Details of the assessment leading to the summary above can be found in the TAR as signposted in Section 2.3 above. The Applicant also provided a detailed response explaining why this surface route was not suitable for further development in responses to the following First Written Questions [REP2-024]:

- AL.1.11 Evidence of a detailed evaluation which supports Applicant's conclusions in respect of Route F010
- AL.1.12 The disadvantages of route F010 and justification for its rejection
- AL.1.13 Details of the key determinants that led to the selection of the preferred route and the elimination of route Option F010

5.3 Updates / further information since Examination

5.3.1 **Environment.** There have been some changes to policy, methodology, guidance, and environmental information changes since examination. These are set out within the Response to Bullet Point Four – Environmental Information Review (Redetermination 1.4) and in Table 1 of the Response to Bullet Point Two – Policy (Redetermination 1.2). Section 12 'Assessment of Alternatives' within the Response to Bullet Point Four – Environmental Information Review (Redetermination 1.4) considers the applicability of the conclusions regarding the assessment of alternative options. In respect of F010 there have been no changes to policy, methodology, guidance, assessment of effects or the environmental baseline which change the conclusions set out in the SAR and TAR. In terms of environmental considerations, this alternative remains a poor option for landscape and visual, biodiversity, noise, surface water and drainage, air quality and people and communities compared to the Scheme.

5.3.2 **Transport.** Since DCO application the assumed electrification of the vehicle fleet and consequential reduction in vehicle operating cost (amongst other changes) has resulted in traffic forecasts along the A303 increasing by approximately 10% from the figures presented in the DCO evidence.

5.4 Impact of updates / further information on the Applicant's position

5.4.1 Other than as described in Section 5.3 above, the circumstances around Route F010 have not changed since the Applicant's original decision not to progress this option.

5.4.2 **Environment:** Based on the above, there are no changes to the Applicant's position.

5.4.3 **Traffic.** Whilst traffic forecasts have changed since the time of the option identification and selection process, the level of change is aligned to the range of uncertainty routinely considered in appraising schemes and options. Given the changes are within the tolerance usually used they are of insufficient magnitude to be of material consideration in judging the relative merits of F010 compared to other options.

5.4.4 The Applicant's position therefore remains unchanged: that it is right that Route F010 was not taken forward for further consideration.

6 The 'Parker' Route

6.1 Background

- 6.1.1 The route referred to as the "Parker Route" was presented by Colonel Graham Parker [REP3-083]. It runs to the south of the WHS and north of Salisbury. Details of the historic route assessment (by Balfour Beatty) were submitted by the Applicant [REP1-019].
- 6.1.2 It was included in the 2004 Public Inquiry as Alternative Route 4 (AR4) [REP1-022]. The Inspector's Report [REP1-021] records the Inspector's findings in paragraphs 10.511 to 10.521, which conclude that AR4 does not warrant further investigation.

6.2 Applicant's Position / Reason not to progress the alternative

- 6.2.1 The Applicant included AR4 in the list of historic routes used to inform the route option development within corridor F (see paragraph 6.4.1 of the TAR [REP1-031]) The route can be seen as a blue line in the TAR's Appendix B.1 [REP1-033]. The assessment of route corridors, including corridor F, is set out in Section 5.2 of the TAR (paragraph 5.2.112 to 5.2.166) and summarised in Table 5-7 (Page 102). Corridor F was not ruled out at this stage.
- 6.2.2 Appendix C6 of the TAR [REP1-034] explains how the historic routes in Corridor F were rationalised and the viable sections of AR4 were incorporated in various route options. The eastern section of AR4 was incorporated into Route Options F001, F003 and F006. The western section was incorporated into Route Option F001, F002 and F007. The central section was ruled out as it bisected Little Durnford and affected High Post Golf Course which were avoidable with other route options.
- 6.2.3 Chapters 6, 7 and 8 of the TAR [REP1-031] explain how the rationalised routes in corridor F were then assessed. The best performing route in the corridor was found to be Route F010, which was itself discounted at a later stage of the option identification and selection process. See section 5 above.
- 6.2.4 In summary, the Applicant's position regarding the Parker Route is that it was assessed as part of corridor F but rejected in favour of route F010 which was taken forward as the best performing route in corridor F010.

6.3 Updates / further information since Examination

- 6.3.1 The position in respect of F010 also applies to the Parker Route, as the conclusions set out there also apply to the rest of the 'F' corridor.

6.4 Impact of updates / further information on the Applicant's position

- 6.4.1 The position in respect of F010 also applies to the Parker Route, as the conclusions set out there also apply to the rest of the 'F' corridor.

7 New Route to the South of Salisbury

7.1 Background

- 7.1.1 An alternative route to the south of Salisbury was proposed by Mr Rhind-Tutt [REP4-004].

7.2 Applicant's Position / Reason not to progress the alternative

- 7.2.1 This route would be contained within Corridor G which was rejected at Step 2 of the option identification and selection process. See Chapter 5 of the TAR [REP1-031] and section 4.2 of the SAR [REP1-023].
- 7.2.2 The evaluation of Corridor G was the subject of Written Question AL.1.15. The Applicant's response [REP2-024] summarised the assessment documented in the TAR.
- 7.2.3 The overriding reasons to exclude Corridor G are summarised in paragraph 4.2.12 of the SAR: The length of such an option would lead to substantially increased habitat loss and severance compared to other corridors, and it would also impact a significant number of communities and designated nature conservation sites. This option, whilst offering improved access to Salisbury would also fail to reduce journey times for users of the A303 through this section. On this basis, the corridor was not considered to meet the transport and environmental objectives of the scheme.
- 7.2.4 The performance of Corridor G was found to be very poor in the following areas:
- Client Scheme Requirements, Environment and Community (See TAR paragraph 5.2.118)
 - Client Scheme Requirements, Transport (See TAR paragraph 5.2.120)
 - Biodiversity (See TAR paragraph 5.2.128)
 - Landscape (See TAR paragraphs 5.2.131 & 132)
 - Air Quality (See TAR paragraphs 5.2.135 & 136)
 - Water Quality and Resources (See TAR paragraphs 5.2.141 - 144)
 - People and Communities (See TAR paragraphs 5.2.145 – 147)
- 7.2.5 Overall corridor assessment summary can be found in the TAR Table 5.7. which concludes as: "*Corridor G performed poorly against the CSRs,*

specifically in relation to Cultural Heritage and Environment and Community. The overall performance against the environmental criteria was very poor. The performance against the EAST criteria was also the worst performing corridor. Given the significant increase in journey length for through traffic and the associated disbenefits associated with the longer route, and the consequential poor fit against the CSRs, it was recommended that this corridor was not taken forward for further consideration.”

- 7.2.6 Wiltshire Council also responded to AL.1.15 [REP2-046] concluding: “*the adverse impact is very likely to be much higher and more significant if this route were used... and would inevitably cause greater impact to a wider complex of habitats and the species”*

7.3 Updates / further information since Examination

- 7.3.1 **Transport.** Whilst traffic forecasts have changed since the time of the option identification and selection process, the level of change is aligned to the range of uncertainty routinely considered in appraising schemes and options. Given the changes are within the tolerance usually used they are of insufficient magnitude to be of material consideration in judging the relative merits of Corridor G compared to other options. It therefore remains the case that Corridor G does not meet the transport objectives for the Scheme.
- 7.3.2 **Environment:** There have been some changes to policy, methodology, guidance, and environmental information changes since examination. These are set out within the Response to Bullet Point Four – Environmental Information Review (Redetermination 1.4) and in Table 1 of the Response to Bullet Point Two – Policy (Redetermination 1.2). Section 12 ‘Assessment of Alternatives’ within the Response to Bullet Point Four – Environmental Information Review (Redetermination 1.4) considers the applicability of the conclusions regarding the assessment of alternative options. In respect of Corridor G, there have been no changes to policy, methodology, guidance, assessment of effects or the environmental baseline which change the conclusions set out in the SAR and TAR. In terms of environmental considerations, this option would lead to substantially increased habitat loss and severance compared to other corridors, and it would also impact a significant number of communities and designated nature conservation sites, therefore would remain a poor option in terms of biodiversity, landscape, air quality, water quality and people and communities compared to the Scheme.
- 7.3.3 **Heritage.** No changes since the assessment in the SAR and the TAR to Corridor G assessment.
- 7.3.4 Two new non-designated long barrows and a hengiform enclosure were identified as part of the evaluation work for routes D061 and D062 in 2017. These lie close to the A360 and are part of the Diamond Group as assessed in the 2018 Environmental Statement Chapter 6 [APP-044] and Heritage Impact Assessment [APP-195].

- 7.3.5 Identification of these heritage assets does not impact the assessment of Corridor G as a whole because any route within the corridor could be aligned to avoid them. However, the alternative route, as put forward by Mr Rhind-Tutt during examination, runs up the A360 to the existing Longbarrow roundabout, along the western boundary of the WHS. The construction of a surface dual carriageway in this location is likely to impact the OUV of the WHS, including physical removal of OUV related archaeological remains within the Diamond Group (AG13).

7.4 Impact of updates / further information on the Applicant's position

- 7.4.1 Other than as described in Section 7.3 above, the circumstances around route Corridor G have not changed since the original DCO decision on 12 November 2020.
- 7.4.2 The only significant changes in circumstance relate to recently discovered heritage assets and to increased traffic forecasts. Each of these changes further strengthens the decision not to progress routes in Corridor G.
- 7.4.3 The Applicant's position therefore remains unchanged: that Corridor G and any route options within Corridor G should not be taken forward for further consideration.

8 New Route to the North of WHS

8.1 Background

- 8.1.1 An alternative route to the North of the WHS was proposed by Mr Garwood [REP3-071].

8.2 Applicant's Position / Reason not to progress the alternative

- 8.2.1 This route would be contained within Corridor A which was rejected at Step 2 of the option identification and selection process. See Chapter 5 of the TAR [REP1-031] and section 4.2 of the SAR [REP1-023].
- 8.2.2 Corridor A would reduce severance within the WHS, and could also result in some benefit to the WHS. However, the harm it would cause to the setting of the WHS and key assets within it (e.g. Durrington Walls) mean substantial harm to the OUV of the WHS is probable and, on balance potential harm to the OUV of the WHS would outweigh the benefits associated with the removal of the A303. The corridor may also adversely affect Nationally and Internationally (European) designated nature conservation sites including parts of Salisbury Plain SPA/SAC.
- 8.2.3 Corridor A has the potential to adversely affect communities and land within the settlements at Larkhill, Durrington and Bulford.
- 8.2.4 The decision making process used at Step 2 of the option identification and selection process is explained in the Applicant's response to Written

question AL.1.15 [REP2-024]. Written question AL.1.15 related to Corridor G, but the same process also applied to Corridor A.

8.2.5 The performance of Corridor A was found to be very poor in the following areas:

- Client Scheme Requirements, Environment and Community (See TAR paragraph 5.2.118)
- Historic Environment (See TAR paragraph 5.2.122)
- Biodiversity (See TAR paragraph 5.2.127)

8.2.6 Overall corridor assessment summary can be found in the TAR Table 5.7. which concludes as: “*Given the overall poor environmental performance and the poor fit against the CSRs, it was recommended that this corridor was not taken forward for further consideration.*”

8.3 Updates / further information since Examination

8.3.1 **Transport.** Whilst traffic forecasts have changed since the time of the option identification and selection process, the level of change is aligned to the range of uncertainty routinely considered in appraising schemes and options. Given the changes are within the tolerance usually used they are of insufficient magnitude to be of material consideration in judging the relative merits of Corridor A compared to other options.

8.3.2 **Environment:** There have been some changes to policy, methodology, guidance, and environmental information changes since examination. These are set out within the Response to Bullet Point Four – Environmental Information Review (Redetermination 1.4) and in Table 1 of the Response to Bullet Point Two – Policy (Redetermination 1.2). Section 12 ‘Assessment of Alternatives’ within the Response to Bullet Point Four – Environmental Information Review (Redetermination 1.4) considers the applicability of the conclusions regarding the assessment of alternative options. In respect of the route north of the WHS there have been no changes to policy, methodology, guidance, assessment of effects or the environmental baseline which change the conclusions set out in the SAR and TAR. In terms of environmental considerations, this option would adversely affect Nationally and Internationally (European) designated nature conservation sites including parts of Salisbury Plain SPA/SAC, and therefore remain a poor option for biodiversity compared to the Scheme.

8.3.3 **Heritage.** A new heritage asset, the Larkhill Causeway Enclosure, that contributes to the OUV of the WHS, was discovered in 2016 as part of the Army Rebasing programme at Larkhill, just to the north of Corridor A. The new heritage asset was considered in Chapter 6 of the ES [APP-044] and as Asset Group AG39 in the Heritage Impact Assessment (HIA) [APP-195] for the DCO Scheme. The option is still assessed as: “*substantial harm to the Outstanding Universal Value (OUV) of the WHS is considered probable*” from Corridor A (TAR section 5.2.122).

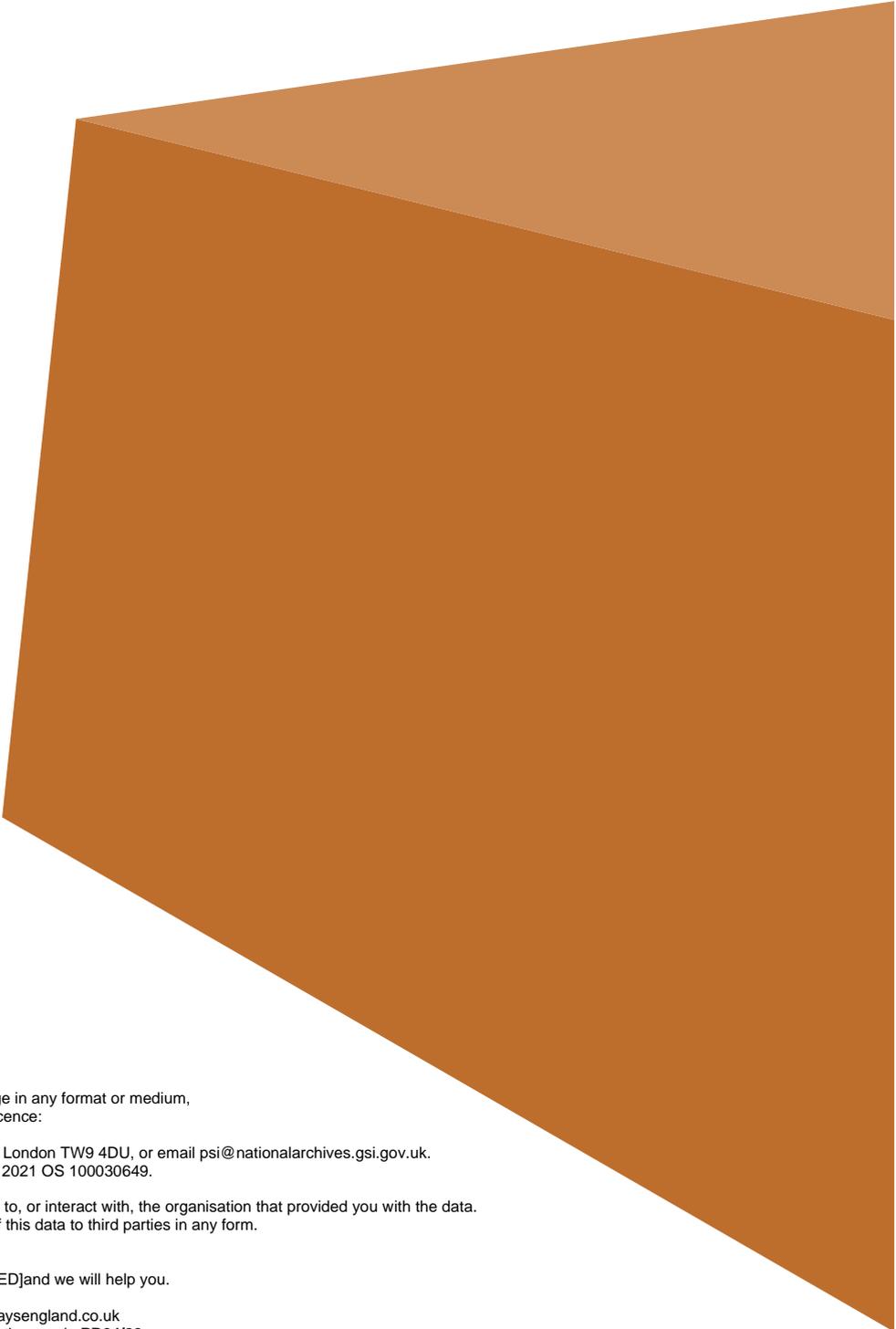
8.4 Impact of updates / further information on the Applicant's position

- 8.4.1 Other than as described in Section 8.3 above, the circumstances around route Corridor A have not changed since the original DCO decision on 12 November 2020.
- 8.4.2 The only significant change in circumstance relates to the newly discovered heritage asset at Larkhill that contributes to the OUV of the WHS. This discovery further strengthens the decision not to progress routes in Corridor A.
- 8.4.3 The Applicant's position therefore remains unchanged: that Corridor A and any route options within Corridor A should not be taken forward for further consideration.

9 Summary and conclusion on alternatives

- 9.1.1 This document presents a summary of the information the Applicant has previously put before the Examining Authority with regard to the consideration of alternatives, along with a review of information and any updates pertaining to the specific alternative routes discussed at examination. The process of option identification and selection has been comprehensive and robust.
- 9.1.2 The alternatives were subject to a multi-criteria assessment considering the Client Scheme Requirements, national and local policies, and implications with regard to construction and civil engineering, traffic and operation, heritage, environment, programme and cost. The principal specific options are discussed below.
- 9.1.3 The cut and cover tunnel extension was rejected on the grounds that the balance of benefits and disbenefits would not justify the significant additional cost, over and above the cost of the Proposed Scheme. The Applicant's overall position to exclude the cut and cover tunnel extension from further development remains unchanged.
- 9.1.4 The Applicant's overall position with respect to a bored tunnel extension remains unchanged: that this option should be excluded from further development. There is no evidence that the additional investment required to extend the tunnel length would deliver meaningful additional benefits to the WHS that would justify the additional cost.
- 9.1.5 The location of the tunnel portal would require Longbarrow junction to be relocated to the west and to be changed to a compact, lower capacity junction not compliant with the design standards. Traffic forecasts since the previous assessment have further strengthened the Applicant's reasons for dismissing this option on traffic and operational grounds.

- 9.1.6 Surface routes to the south of the WHS (F10 and the “Parker route”) were rejected on the grounds that they would have a much larger footprint and a greater overall environmental impact than the partially tunnelled options. These surface routes would also leave higher levels of rat-running traffic adversely affecting the quality of life in local communities. The Applicant’s overall position remains unchanged.
- 9.1.7 The new route to the south of Salisbury would lead to substantially increased habitat loss and severance compared to other corridors, and it would also impact a significant number of communities and designated nature conservation sites. This option, whilst offering improved access to Salisbury would also fail to reduce journey times for users of the A303 through this section. Consequently this option was rejected and the Applicant’s overall position remains unchanged.
- 9.1.8 The new route north of the WHS fits within Corridor A which was rejected on the basis of the harm it would cause to the setting of the WHS and key assets within it (e.g. Durrington Walls). The corridor may also adversely affect Nationally and Internationally (European) designated nature conservation sites including parts of Salisbury Plain SPA/SAC. Corridor A also has the potential to adversely affect communities and land within the settlements at Larkhill, Durrington and Bulford. The Applicant’s overall position remains unchanged.
- 9.1.9 The Applicant confirms its position (which is unchanged from that put forward in its application and subsequently at examination), that the Scheme would have a slight beneficial effect on the OUV of the WHS as a whole, taking into account that of the seven attributes of OUV for the WHS, whilst the Scheme will have a slight adverse effect on two of those attributes, it will have a beneficial effect on the remaining five. As shown in this document and the Applicant’s other responses to the Statement of Matters that there has been no relevant change since the Secretary of State’s decision, the Applicant’s position remains as set out in its Closing Submission [AS-146 5.2.6 and 5.2.7] and in its comprehensive and robust assessment.
- 9.1.10 We remain confident the Proposed Scheme is an effective solution to the traffic problems along this notoriously congested section of the A303 and addresses a longstanding threat to the Integrity of the WHS by the removal of the intrusive sight and sound of traffic from much of the WHS landscape.



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