

A303 Amesbury to Berwick Down (Stonehenge)

**Secretary of State Request for
Comments from Interested Parties**

Wiltshire Council Response

August 2022

1. Introduction

The application for development consent for the A303 Amesbury to Berwick Down (Stonehenge) road improvement scheme is currently in the process of being re-determined by the Secretary of State for Transport.

On 20th June 2022, the Secretary of State requested further comments from National Highways, as the scheme Applicant, by 27th June 2022 in relation to six areas where clarification and / or additional supporting information was required following the submission of comments from Interested Parties in April 2022. A two-week extension to the original deadline for the response was agreed by the Secretary of State on 23rd June 2022.

National Highways submitted their response to the Secretary of State on 11th July 2022 and this information was published on the Planning Inspectorate website on 12th and 13th July. On 13th July 2022, the Secretary of State invited comments from all Interested Parties on the National Highways submission by 3rd August 2022.

Wiltshire Council has reviewed the published information and the Council's comments and observations in relation to this material are set out in the following sections.

2. National Highways Response to Secretary of State

Wiltshire Council notes that the National Highways response to the Secretary of State comprised a covering letter and 13 documents. The National Highways covering letter identified the documents provided as follows:

Document name	Document reference
Q1, Q3-Q6 – Response document	Redetermination 4.1
Q5 – Environmental Statement on heritage matters – Figures	Redetermination 4.1 Figures
Q2 – Conclusion on alternative routes – Overarching response	Redetermination 4.2
Q2 – Conclusion on alternative routes Outline Heritage Impact Assessment – Bored Tunnel Extension	Redetermination 4.3
Q2 – Conclusion on alternative routes Outline Heritage Impact Assessment – Bored Tunnel Extension - Figures	Redetermination 4.3 Figures
Q2 – Conclusion on alternative routes Outline Heritage Impact Assessment – Cut and Cover Tunnel Extension	Redetermination 4.4
Q2 – Conclusion on alternative routes Outline Heritage Impact Assessment – Cut and Cover Tunnel Extension - Figures	Redetermination 4.4 Figures
Q2 – Conclusion on alternative routes Environmental Appraisal (Heritage) – Bored Tunnel Extension	Redetermination 4.5
Q2 – Conclusion on alternative routes Environmental Appraisal (Heritage) – Bored Tunnel Extension - Figures	Redetermination 4.5 Figures
Q2 – Conclusion on alternative routes Environmental Appraisal (Heritage) – Cut and Cover Tunnel Extension	Redetermination 4.6
Q2 – Conclusion on alternative routes Environmental Appraisal (Heritage) – Cut and Cover Tunnel Extension - Figures	Redetermination 4.6 Figures
Q2 – Conclusion on alternative routes Environmental Appraisal – Bored Tunnel Extension	Redetermination 4.7
Q2 – Conclusion on alternative routes Environmental Appraisal – Cut and Cover Tunnel Extension	Redetermination 4.8

For ease of reference, where Wiltshire Council has commented on specific documents or sections within those documents, these are identified using the National Highways document reference numbers illustrated in the table above.

2.1. Consortium of Stonehenge Experts

Wiltshire Council notes the National Highways response in section 1 of document reference number Redetermination 4.1 in relation to matters raised by the Consortium of Stonehenge Experts.

2.2. Conclusion on Alternative Routes

Wiltshire Council welcomes the additional information and assessments (document references Redetermination 4.2 to Redetermination 4.8 inclusive) provided by National Highways in relation to the tunnel extension alternatives.

It is acknowledged that National Highways has not developed the tunnel extension alternatives to the same level as the existing Development Consent Order (DCO) application scheme. However, the Council notes in particular the conclusion that the bored tunnel extension alternative would be moderately beneficial on the Outstanding Universal Value (OUV), Integrity and Authenticity of the World Heritage Site (WHS) and that the cut and cover tunnel extension alternative would be slight to moderately beneficial on the OUV, Integrity and Authenticity of the WHS. This is compared with the DCO scheme which has been assessed as being slightly beneficial. This conclusion for the cut and cover tunnel extension alternative is seen as significant from a heritage perspective by the Council, and in the case of the conclusion for the bored tunnel extension alternative, highly significant, due to the increase in benefits that it would bring to the WHS and in relation to the concerns and recommendations raised by UNESCO and the World Heritage Committee regarding the DCO scheme.

Further assessment and development of the scheme design would be required in order for the Council to be able to offer a definitive position on either of these tunnel extension alternative proposals. For example, the landscape and drainage features would need to be designed. A full and comprehensive environmental assessment would need to be undertaken including a detailed Heritage Impact Assessment (HIA) and a Landscape and Visual Impact Assessment (LVIA). A pluvial and groundwater flood risk assessment would be required to better understand the impacts associated with the tunnel extension alternatives. The implications with regard to the construction programme and approach would also need to be better understood. This would include whether there would be any proposed changes to the site compound locations or layouts and whether the tunnel extension alternatives would impact upon the proposed supply route and programme for the 33kv electricity cabling work to the Longbarrow substation for the tunnel boring machine. It is considered that further consideration of mitigation measures would also be required, for example, in relation to the visual and aural impacts around Winterbourne Stoke. Further mitigation measures may need to be considered in relation to the expected traffic volumes on the local road network. The Council considers that this could be addressed through amendment to the legal agreement between National Highways and Wiltshire Council covering specific local roads.

This more detailed assessment and design should be undertaken if the Secretary of State was minded to consider either of these tunnel extension alternatives further.

However, based on the information currently provided by National Highways, Wiltshire Council wishes to make the following comments and observations on the environmental and heritage assessment of the tunnel extension alternatives.

2.2.1. Air Quality

Wiltshire Council notes the assessment by National Highways in relation to air quality in document reference numbers Redetermination 4.7 and Redetermination 4.8 and as summarised in Redetermination 4.2.

The Council agrees that the construction and operational phase impacts for Hill Farm / Hill Farm Cottages and Winterbourne Stoke for the tunnel extension alternatives would be insignificant when compared with the DCO scheme.

Please also see the comments in section 2.2.9 below regarding the use of terminology to describe public rights of way in these documents.

2.2.2. Cultural Heritage

Wiltshire Council welcomes the Outline HIA (document reference numbers Redetermination 4.3 and Redetermination 4.3 Figures) and the Environmental Appraisal for heritage (document reference numbers Redetermination 4.5 and Redetermination 4.5 Figures) for the bored tunnel extension alternative. The outline HIA (document references Redetermination 4.4 and Redetermination 4.4 Figures) and the Environmental Appraisal for heritage (document reference numbers Redetermination 4.6 and Redetermination 4.6) for the cut and cover tunnel extension alternative are similarly welcomed. The Council recognises the limitations of the Outline HIA assessments and lack of peer review. It is also noted that these assessments are summarised in document reference number Redetermination 4.2.

The Council notes in particular the conclusion that the bored tunnel extension alternative would be moderately beneficial on the OUV, Integrity and Authenticity of the WHS and that the cut and cover tunnel extension alternative would be slight to moderately beneficial on the OUV, Integrity and Authenticity of the WHS. This is compared with the DCO scheme which has been assessed as slightly beneficial. This conclusion for the cut and cover tunnel extension alternative is seen as significant from a heritage perspective by the Council, and in the case of the conclusion for the bored tunnel extension alternative, highly significant, due to the increase in benefits that it would bring to the WHS.

It would have been helpful for a full and comprehensive Environmental Appraisal and HIA to have been undertaken so that our understanding of the impact of these tunnel extension alternatives was on a par with the DCO scheme. This is considered especially relevant given the concerns and recommendations raised by UNESCO and the World Heritage Committee with regard to the DCO scheme. This more detailed assessment could assist the Secretary of State in considering whether either of these tunnel extension alternatives should be explored further.

Furthermore, the brief reference to the separate cultural heritage documentation in section 4.3 of document reference numbers Redetermination 4.7 and Redetermination 4.8 is noted. However, it is considered that it would have been a more informative and balanced approach for the summary comparison of the DCO and tunnel extension alternative schemes in Table 5.1 (and in relation to Tables 4.8 and 4.9) of these documents to include heritage. This would similarly apply to Table 4 and Table 6 in document reference number Redetermination 4.2. It is considered that as a result of this omission, the statement in section 5.1.2 of document reference numbers Redetermination 4.7 and Redetermination 4.8 that no new significant beneficial effects have been identified is therefore misleading as it is focused on the content of these Environment Appraisal documents rather than the combined environmental assessment.

Please also see the comments in section 2.2.9 below regarding the use of terminology to describe public rights of way in these documents.

2.2.3. Landscape and Visual

It is noted that a LVIA has not been undertaken of the tunnel extension alternatives. Judgements of the landscape and visual significant effects of the tunnel extension alternatives are based on the Environmental Impact Assessment (EIA) submitted with the DCO scheme.

The removal of direct landscape impacts from the WHS through the bored tunnel extension alternative would be welcomed. It is noted that construction works would result in a temporary but significant negative effect on the local landscape character of the WHS, especially for the cut and cover tunnel extension alternative (direct impact). Visual receptors within the WHS are likely to see construction activity associated with the Alternative Longbarrow Junction. Local residents and users of Public Rights of Way (PRoW) would potentially be more adversely affected during construction as the Alternative Longbarrow Junction would be positioned closer to these receptors.

During operation, it is considered that the removal of the tunnel portal from the WHS and relocation of the Longbarrow Junction further to the west would fulfil the objective to reconnect landscapes and restore tranquillity to the WHS. Whilst there would be adverse impacts to the local landscape character, the alternative staggered junction design would be more sympathetic to the WHS landscape setting than the DCO scheme junction. The visual intrusion of the tunnel extension alternatives and Alternative Longbarrow Junction are likely to have significant adverse visual effects on users of PRoWs and some local residents.

Wiltshire Council agrees that there are potential significant adverse impacts of increased levels of artificial lighting during the operational phase associated with the Alternative Longbarrow Junction in relation to the Hill Farm / Hill Farm Cottages, Foredown House and Winterbourne Stoke receptors. These will need further consideration in the event that the Alternative Longbarrow Junction was to be taken forward as part of either of the tunnel extension alternatives. It is considered that there is an opportunity to design a lighting strategy for the Alternative Longbarrow Junction to minimise negative impacts to local residents and create dark skies for the WHS if either tunnel extension alternative was to be considered further.

When considering the cumulative effects and comparison of the tunnel extension alternatives with the DCO scheme overall, it is considered that there would be beneficial landscape effects for the WHS with the tunnel extension alternatives. However, the moving of the tunnel portal and relocation of the Longbarrow Junction closer to Winterbourne Stoke would create new significant adverse visual effects for some residents and users of PRoWs. In the event that either of these tunnel extension alternatives were to be considered further, the design should develop an enhanced mitigation strategy to reduce the significant adverse visual effects on local communities.

Please also see the comments in section 2.2.9 below regarding the use of terminology to describe public rights of way in these documents.

2.2.4. Biodiversity

Wiltshire Council notes the assessment by National Highways in relation to biodiversity in document reference numbers Redetermination 4.7 and Redetermination 4.8 and as summarised in Redetermination 4.2.

It is considered that the previously agreed measures in the Outline Environmental Management Plan (OEMP) would provide safeguards in the case of either of the tunnel extension alternatives. However, a more detailed assessment would be required following development of the outline design if either of these tunnel extension alternatives were to be considered further.

2.2.5. Noise and Vibration

Wiltshire Council notes the assessment by National Highways in relation to noise and vibration in document reference numbers Redetermination 4.7 and Redetermination 4.8 and as summarised in Redetermination 4.2.

Wiltshire Council agrees that there would be significant adverse impacts from construction noise during that phase of the project in relation to Hill Farm / Hill Farm Cottages for both tunnel extension alternatives. Whilst it is acknowledged that the construction phase is temporary, and controls will be in place under the OEMP, it will continue for an extended period of time. It is therefore anticipated that this would result in complaints from residents.

With regard to the operational phase impacts for the tunnel extension alternatives, it is agreed that traffic noise at Hill Farm / Hill Farm Cottages and Winterbourne Stoke from the Alternative Longbarrow Junction would increase due to its westward relocation. However, it is considered this would likely to be outweighed by the reduction in traffic noise due to the lack of use of the old A303. Wiltshire Council also agrees that a significant adverse traffic noise effect at Foredown House is anticipated during the operational phase. Furthermore, it is agreed that there is likely to be increased noise to residential receptors from increased traffic along the B3083, which are not included in the DCO scheme. No significant vibration effects during operation are anticipated.

Please also see the comments in section 2.2.9 below regarding the use of terminology to describe public rights of way in these documents.

2.2.6. Geology and Soils

Wiltshire Council notes the assessment by National Highways in relation to geology and soils in document reference numbers Redetermination 4.7 and Redetermination 4.8 and as summarised in Redetermination 4.2.

It is considered that the previously agreed measures in the OEMP relating to contaminated land would provide safeguards in the case of either of the tunnel extension alternatives.

2.2.7. Road Drainage and the Water Environment

Wiltshire Council notes the assessment by National Highways in relation to road drainage and the water environment in document reference numbers Redetermination 4.7 and Redetermination 4.8 and as summarised in Redetermination 4.2.

In section 4.8 of both document reference numbers Redetermination 4.7 and Redetermination 4.8, it contains an environmental appraisal of key receptors and construction and operation impacts in relation to road drainage and the water environment. However, this does not constitute a flood risk assessment. The Council is therefore unable to comment on the flood risk impacts of the tunnel extension alternatives.

Further assessment of pluvial and groundwater flood risk would be required to understand the impact of the tunnel extension alternatives in the event that the Secretary of State was minded to consider these alternatives further.

It is further noted that the cut and cover construction method for the tunnel extension in document reference number Redetermination 4.8 would require extensive dewatering. Measure MW-WAT8 of the OEMP requires the contractor to adopt construction techniques that minimise, so far as reasonably practicable, the need for and extent of dewatering. As such, the cut and cover method is considered unsuitable.

2.2.8. Materials and Waste

Wiltshire Council notes the assessment by National Highways in relation to materials and waste in document reference numbers Redetermination 4.7 and Redetermination 4.8 and as summarised in Redetermination 4.2.

A more detailed assessment would be required following preparation of the landscape design if either of these tunnel extension alternatives were to be considered further.

2.2.9. People and Communities

The DCO scheme brings about widespread changes to the public accessibility of the Stonehenge World Heritage Site (WHS) and will create a number of new network links, primarily related to the extinguishment of some categories of public rights over A class roads (including the course of the A303 trunk road itself), effectively, the re-purposing of these highways. It is therefore considered important that all references to public rights of way are correct and consistent with the application as a whole and, specifically, within these environmental and heritage assessment documents, which require an overview balancing assessment to be made between compared options.

The definitive map and statement is conclusive in law as to what it shows and there are four categories of rights of way that may be recorded. These are as follows:

Category	Conclusive Lawful Use	Prescribed Symbolology
Footpath	On foot	Continuous purple line, or broken black line with intervals or continuous line with short bars at intervals
Bridleway	On foot, on horseback or leading a horse. On a bicycle but must give way to other users	Continuous green line, or broken line with cross bars in the intervals or continuous line with cross bars in the intervals
Restricted Byway	On foot, on horseback or leading a horse or with any non-mechanically propelled vehicle	Broken green line or broken line with small arrowheads
Byway Open to All Traffic	Vehicular and all other kinds of traffic	Continuous brown line or continuous line with arrowheads above and below the line

Whilst the Council considers that the use of this symbolology (or that used by the Ordnance Survey) throughout these documents would have been the most accessible approach, it is considered that Figure 11 as appended to document reference numbers Redetermination 4.3 Figures and Redetermination 4.4 Figures is reasonably clear in their representation of the route and status of the existing public rights of

way. Furthermore, the Council considers that document reference Redetermination 4.2 was clear in its intention with regard to the public rights of way.

However, it has been noted that the description of public rights of way varies between the other documents with an inconsistent use of the terms that carry a legal definition (restricted byway and byway open to all traffic (BOAT)), and the more generic term of “byway”, which has been used to describe routes both with and without a public right for mechanically propelled vehicles (MPV). There is therefore a lack of consistency and clarity of intention in document reference numbers Redetermination 4.3 to Redetermination 4.8 inclusive. Specific instances are listed in the table below.

The overarching effect of this is that it may be unclear to anyone reviewing these documents whether re-classified roads are to carry a right for the public to use them with MPVs or not. This has the potential to confuse or mislead potential users of the network as to the effects of the tunnel extension alternatives, but it also hinders the ability to make comparative assessment for visual and audible impact.

It appears from section 4.10.3, Table 4.7 People and Communities Receptors and Table 4.9 Summary of Potential Combined Operational Impacts (document references Redetermination 4.7 and Redetermination 4.8) that the impact of closures on users of BOAT WST06B and routes within the River Till Flood Plain has not been assessed for the users of MPVs, possibly as a result of this confusion in terminology and classification (see table below). Additionally, it is not understood why the impact of the closure of BOAT WST06B during the construction phase and the diversion of non-motorised users along the B3083 has been evaluated as not to be significant. It is considered unlikely that a B class road in this area would provide a safe environment for horse riders and to a lesser extent, cyclists and walkers. Whilst the proposed creation of a new bridleway near this location is noted, the timing for creating this new provision would be an important consideration before the proposed closure of WST06B. If either of these tunnel extension alternatives were to be progressed, it is considered that this should be considered in any further assessment.

It is considered that section 5.2.12 in document references Redetermination 4.7 and Redetermination 4.8 would benefit from further clarification. Whilst the downgrading of the existing A303 to a restricted byway will reduce traffic within the WHS, it will not remove it entirely. This is because neither the DCO scheme nor the tunnel extension alternatives are proposing to downgrade all existing BOATs within the WHS, and therefore MPVs will still be permitted to use them.

The following table highlights where clarity is required in the documents with regard to the terminology used.

Document Reference	Phrase from Document	Suggested Wording	Possible Effect of Published Wording / Phrase
Section 8.2.6, item 1. (Redetermination 4.3 and Redetermination 4.4)	“...visual intrusion of illegally parked vehicles on byways...”	Use byways open to all traffic (or BOAT) instead of byway	This may refer to a restricted byway or byway open to all traffic. Parking is more likely to be illegal on a restricted byway
Section 8.3.8 (Redetermination 4.3 and Redetermination 4.4) Section 8.3.16 (Redetermination 4.3)	“...would be removed and replaced with byways for non-motorised users.”	Use restricted byway instead of or as well as “byways for non-motorised users”. If this was intended to include the new bridleway or cycle way	Although this is a good descriptive phrase, it is not defined in the documents and it is considered that it would be clearer if the term restricted byway (or other appropriate defined

Document Reference	Phrase from Document	Suggested Wording	Possible Effect of Published Wording / Phrase
Section 8.3.15 (Redetermination 4.4)		provisions near this location, please include this so that the wording was specific	classification) was used. The term restricted byway is correctly used in later references e.g. Redetermination 4.3, sections 8.3.34, 8.3.36, 8.3.37, 11.4.9 or Redetermination 4.4, sections 8.3.22, 8.3.24, 8.3.33, 11.4.9 etc.
Section 8.3.62 (Redetermination 4.3) Section 8.3.61 (Redetermination 4.4)	"...appreciate it on foot, by cycle or on horseback, by using the new A303 restricted byway or other paths in the vicinity."	Add users of non-mechanically propelled vehicles	This fails to recognise that a restricted byway may also be used and appreciated by carriage drivers
Section 8.5.6 (Redetermination 4.5) Section 8.6.1 (Redetermination 4.6)	"...downgrading of the A360 to a byway to the east" "positive changes to setting"	Use restricted byway instead of byway	The term byway is used throughout some other documents for existing byways open to all traffic. Clarity is therefore required. Confusion with the extent of downgrading makes positive change difficult to assess for those less conversant with the scheme
AG12 and AG13, Appendix 1.2 (Redetermination 4.5 and Redetermination 4.6)	"A303 and A360 downgraded to byway..."	Use restricted byway instead of byway	The term byway is also used for existing BOATs. Clarity is therefore required as intention is unclear
AG17, AG19A and AG19B, Appendix 1.2 (Redetermination 4.5 and Redetermination 4.6)	"A303 downgraded to byway..."	Use restricted byway instead of byway	The term byway is also used for existing BOATs. Clarity is therefore required as intention is unclear
Discrete Assets UID 2177/7092 MW176819 (Redetermination 4.5 and Redetermination 4.6)	"Positive change to setting with downgrading of existing A303 (17m to the north) to a byway"	Use restricted byway instead of byway	The term byway is also used for existing BOATs. Clarity is therefore required. Confusion with the extent of downgrading makes positive change difficult to assess for those less conversant with the scheme
Table 4.1 Air Quality Receptors, Table 4.2 Landscape and Visual Receptors, Table 4.4 Noise and Vibration Receptors and Table 4.7 People and	"Byway WST06B" "...This byway would be closed during construction."	Use byway open to all traffic or BOAT instead of byway	WST06B is a byway open to all traffic. The generic term byway does not describe it effectively and makes it difficult to assess impact of changes

Document Reference	Phrase from Document	Suggested Wording	Possible Effect of Published Wording / Phrase
Communities Receptors (Redetermination 4.7 and Redetermination 4.8)			
Table 4.2 Landscape and Visual Receptors and Table 4.7 People and Communities Receptors (Redetermination 4.7 and Redetermination 4.8)	“Byway WST06B” “Byway and footpath WST04”	WST06B and part of WST04 are byways open to all traffic	This fails to distinguish between BOATs and restricted byways which creates confusion as to what is proposed and who can use it. This creates difficulties when assessing the impact of changes
Section 4.4.4 (Redetermination 4.7 and Redetermination 4.8)	“...restoration of the A303 to a byway...”	Use restricted byway instead of byway	The term byway is also used for existing BOATs. Clarity is therefore required as intention is unclear
Table 4.4 Noise and Vibration Receptors (Redetermination 4.7 and Redetermination 4.8)	“Various PRow”	Name all affected PRow as per Table 4.7	This assessment should be more specific and name the PRow located around Winterbourne Stoke otherwise it undermines confidence in the assessment undertaken
Table 4.7 People and Communities Receptors (Redetermination 4.7) Table 4.1 Air Quality Receptors, and Table 4.2 Landscape and Visual Receptors (Redetermination 4.8)	“Byway WCLA1”	Use byway open to all traffic or BOAT instead of byway	WCLA1 is a byway open to all traffic. The generic term byway does not describe it effectively
Section 4.10.3 (Redetermination 4.7 and Redetermination 4.8)	“Byway WST06B would be closed during construction, adversely impacting non-motorised users (NMU). A local alternative route to the byway is available to the west using the B3083 road, albeit with the added presence of traffic. NMU would still be able to complete their journeys but would be adversely impacted due to this. The effect of the	Use byway open to all traffic or BOAT instead of byway	This fails to identify that motorised users are also affected or to consider the impact / effect upon them

Document Reference	Phrase from Document	Suggested Wording	Possible Effect of Published Wording / Phrase
	NMU closure is anticipated not to be significant.”		
Table 4.9 Summary of potential combined operational impacts (Redetermination 4.7 and Redetermination 4.8)	“Recreational users on byways within the River Till floodplain” “Diverted users of WST06”	Use byway open to all traffic or BOAT instead of byway	This possibly fails to identify any operational impact for MPV users (see above)
Section 5.2.42 (Redetermination 4.7) Section 5.2.41 (Redetermination 4.8)	“...the diversion of byway WST06B...”	Use byway open to all traffic or BOAT instead of byway	WST06B is a byway open to all traffic. The generic term byway does not describe it effectively
Table 4.1 Air Quality Receptors and Table 4.2 Landscape and Visual Receptors (Redetermination 4.8)	“Byway AMES12”	Use byway open to all traffic or BOAT instead of byway	AMES12 is a byway open to all traffic. The generic term byway does not describe it effectively

2.2.10. Climate

Wiltshire Council notes the assessment by National Highways in relation to climate in document reference numbers Redetermination 4.7 and Redetermination 4.8 and as summarised in Redetermination 4.2.

Please see the comments in section 2.2.7 above in relation to flood risk regarding these tunnel extension alternatives.

2.2.11. Traffic Appraisal

Wiltshire Council notes the traffic appraisal assessment for the tunnel extension alternatives by National Highways in document reference number Redetermination 4.2.

The Council considers that the assessed impact on traffic flow and journey times on the A360 and B3083 would require further consideration in the event that the Secretary of State was minded to consider these tunnel extension alternatives further. It is considered that an amendment to the legal agreement between National Highways and Wiltshire Council which covers specific local roads would be required.

2.3. Information and Assessments

Wiltshire Council notes the response by National Highways in section 3 of document reference number Redetermination 4.1, and specifically in relation to section 3.5 which addresses comments previously made by the Council.

The National Highways commitment to engage with the Council on climate and carbon assessments once the requirements for local authorities in relation to Local Transport Plans are better defined by the Department for Transport (DfT) is welcomed. It is expected that this engagement will include the provision of any calculations necessary to support the Council in the development of its Local Transport Plan and associated Carbon Delivery Pathways.

The additional information and updates provided in this document and the supporting figures (document reference Redetermination 4.1 Figures) in relation to heritage and archaeological issues previously raised by Wiltshire Council are noted. The Council has no further comments to make in relation to these issues at this stage.

It is considered that the responses provided in this document to queries related to biodiversity and the water environment are reasonable and comprehensive. The Council is satisfied that the biodiversity update surveys have been or are in the process of being carried out and that National Highways continues to have regard for biodiversity considerations.

Wiltshire Council notes the response by National Highways in relation to its comments regarding road drainage and the water environment.

The Council is satisfied with the National Highways response with regard to geology and soils (contaminated land) indicating that the contractors will be required to control measures as required by PW-GEO4 and MW-GEO8 contained in the OEMP. These conditions make provision for further investigation, assessment and mitigation based on findings at the sites and this will be carried out in consultation with the Environment Agency and Wiltshire Council.

With regard to the responses relating to the Transport Assessment Review, Wiltshire Council appreciates the acknowledgement by National Highways of a minor geographical descriptive error at paragraph 4.2.10 of the Transport Assessment Review (Redetermination 1.4.1). Furthermore, the Council wishes to thank National Highways for the further information and explanation supplied in relation to the Council's concerns about the nature of traffic using the eastern part of The Packway, the changes influenced by the updated Uncertainties Log, and reassurances in relation to 'rat-running' traffic on The Packway, post scheme completion.

2.4. Stonehenge Alliance

Wiltshire Council notes the National Highways response in section 4 of document reference number Redetermination 4.1 in relation to matters raised by the Stonehenge Alliance.

2.5. Environmental Statement on Heritage Matters

The additional information and updates provided in document reference Redetermination 4.1 and the supporting figures (document reference Redetermination 4.1 Figures) in relation to heritage and archaeological issues previously raised by Wiltshire Council are noted. The Council has no further comments to make in relation to these issues at this stage.

2.6. Newly Assessed Assets

Wiltshire Council notes the National Highways response in section 6 of document reference number Redetermination 4.1 in relation to matters raised by Historic England.

3. Conclusion

Wiltshire Council has reviewed the National Highways response to the Secretary of State submitted on 11th July 2022. The Council's comments and observations on this submission is as set out above.

In summary, Wiltshire Council welcomes the additional information and clarification provided by National Highways in relation to matters raised by Interested Parties in their April 2022 submissions. The additional information and outline assessments in relation to the tunnel extension alternatives are also welcomed. The

Council notes that the tunnel extension alternatives would have some beneficial effects, especially with regard to the WHS. However, more detailed and comprehensive assessment and design would be required to fully understand the impacts of the tunnel extension alternatives should the Secretary of State be minded to consider these further.