

Appendix 1

A303 Non-Statutory Public Consultation Response by Wiltshire Council

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I. Introduction and Context

1. The proposal the subject of this consultation raises many considerations for the Council, which can be summarised into two key questions:
 - Does the proposal accord with the strategy for this area of Wiltshire as set out in the Wiltshire Core Strategy?
 - What are the technical issues raised by the proposal and what, if any, mitigation should be required as a consequence of any potential impacts?
2. The first consideration is to consider how the proposals help deliver the Council's strategic objectives as set out in the Core Strategy. Secondly, consideration of the specific impacts that a scheme of this scale may have on the environment and if it is possible to mitigate them.

II. Consideration of Strategic Objectives

Economic Considerations

3. The Wiltshire Core Strategy is an economy-led strategy, which unequivocally places an emphasis on economic growth as the driving force behind meeting its objectives. The underpinning idea of the strategy is to strengthen communities, wherever possible,

by maintaining and increasing the supply of jobs to ensure that Wiltshire remains strong and prosperous.

4. In strategic planning terms, Wiltshire faces a number of challenges, of which reducing levels of out-commuting from many of the county's settlements is a significant one. Evidence suggests that lack of local job opportunities and pay differentials are a major driver meaning that higher earners commute out of the county to work. To address this, the self-containment of the main settlements needs to be improved to ensure that there are a wide range of appropriate employment opportunities available, reflecting the needs of inward investors and Wiltshire's communities. Delivering a good level of local employment opportunities close to the main centres of population will help reduce the need to commute out of Wiltshire to seek work. Broadening the employment base and providing choice in the job market for Wiltshire's population is a key element of delivering resilient communities.
5. Strategic Objective 1: "Delivering a thriving economy" makes clear that *"Wiltshire needs to encourage a buoyant and resilient local economy. The Core Strategy enables development to take place and encourages economic vitality, providing local jobs for Wiltshire's population, whilst ensuring that sustainable development objectives have been met....."*
6. The wider strategy of the Wiltshire Core Strategy, is to accelerate the transition toward high value and innovative local jobs to offset the traditional declining sectors such as financial services. One of the key outcomes of the Strategic Objective 1 is that Wiltshire will have secured sustainable growth of established and emerging employment sectors, building on existing strengths, including defence-related employment, bioscience, advanced manufacturing and business services.
7. A significant part of the proposal falls within the Amesbury Community Area. The Core Strategy vision for Amesbury includes that Amesbury will have good levels of employment, including the specialist sectors within the MoD, QinetiQ at Boscombe Down and the scientific research at Porton Down.
8. Core Policy 4 identifies the Boscombe Down site in this community area as a Principal Employment Area as well as allocating 7 ha of employment land on the site. Core Policy 35 states that Wiltshire's Principal Employment Areas should be retained for employment purposes within use classes B1, B2 and B8 to safeguard their contribution to the Wiltshire economy and the role and function of individual towns. Proposals for renewal and intensification of the above employment uses within these areas will be supported.
9. Core Policy 37 relates to Military establishments, of which Boscombe Down is one. This policy offers support for new development at such operational facilities that help enhance or sustain their operational capacity.
10. Core Policy 4 also allocates 10 ha of employment land at Porton Down in the Amesbury community area, where the establishment of a private sector science park is currently ongoing.
11. There is therefore already a significant cluster of excellence centred on scientific defence, research and development operating in this community area and using them as leverage to attract synergistic inward investment is a key objective of the Wiltshire Core Strategy.

12. The area strategy for the Amesbury community area lists specific issues that need to be addressed in planning for this area. It recognises that the A303 corridor runs through the area and is a main arterial route from London to the south west. It suffers from problems, with intermittent stretches of single lane carriageway causing large delays at peak times. This has a knock-on effect on the attractiveness of the area for business and tourism investment.
13. Effective, efficient road links are fundamental to enable businesses to prosper and help to unlock further economic growth. The A303 scheme between Amesbury and Berwick Down will significantly reduce journey times which in turn will cut transport costs, and give businesses in Wiltshire better access to the market, suppliers and skills. Wiltshire's inward investment attractiveness will also be strengthened and the creation of an expressway will improve accessibility between businesses and their customers. The scheme will also help to link people with jobs and provide better access towards higher value, local jobs which in turn will contribute towards reducing out-commuting from Wiltshire.
14. At a regional level, the South West region is home to one of the largest concentration of aerospace and defence activities in Europe and the largest cluster in the UK, with its local supply chain supporting 14 of the world's leading aerospace / defence companies. The centre of excellence developing at Boscombe Down and Porton Down is a significant part of this. The A303 scheme will consolidate this position by improving connections between regional business communities, enabling more efficient access to their supply chains as well as providing employees better access to high skilled jobs.

Conclusion on Economic Considerations

15. In principle, therefore, the proposal for the improved road will play a pivotal role in contributing towards the implementation of various key policy and strategy priorities set out in the Core Strategy.
16. The established Plan for job growth and meeting the needs of business are central to the Core Strategy. This plan puts in place policies which will help both attract new inward investment and help existing business meet their aspirations in Wiltshire, as well as providing the right environment for business start-ups. The A303 scheme will remove a potential barrier to investment, improve connectivity between businesses and their customers, and provide employees with greater access to higher value jobs.

Tourism Considerations

17. Tourism plays a significant part in the economic health of Wiltshire and is worth over £779 million a year. Wiltshire has a wealth of natural and heritage assets which attract visitors from home and abroad that range from one of the world's most famous and recognisable monuments, Stonehenge, to renowned attractions such as Longleat Safari and Adventure Park to country houses, museums and gardens. Rural countryside within the AONBs, Wiltshire's canal network, historic villages such as Lacock and farm and animal attractions also draw visitors to the area. Wiltshire is also well placed for visiting attractions such as the New Forest National Park, the Cotswolds, Bath Spa and the major resorts and beaches at Bournemouth and Poole. Wiltshire's built and natural environment is a key part of the tourism product and the future success of the area's tourism industry is, in many ways, dependent on the effective management and conservation of the environment.
18. The Spatial Vision of the Core Strategy states that by 2016, Wiltshire's heritage will have been a major driver used to promote tourism for economic benefit.

19. Strategic Objective 1 “Delivering a thriving economy” recognises that the potential of tourism should be realised as a major growth sector through capitalising on the quality of the environment and location Wiltshire benefits from. The Core Strategy identifies that one of the key outcomes of this objective will be that Wiltshire’s tourism sector will have grown in a sustainable way, ensuring the protection and where possible enhancement of Wiltshire’s environmental and heritage assets.
20. The Core Strategy recognises that World Heritage Site (WHS) status offers the potential of considerable social and economic gains for Wiltshire in areas such as sustainable tourism, but that this will require careful and sensitive management in order to protect the WHS and sustain its OUV (para 6.144). Large numbers of overseas visitors, as well as domestic tourists consider Stonehenge a “must-see” attraction. However, there is a lack of capital made on this unique opportunity locally. The A303 scheme will reconnect Stonehenge with the rest of the WHS lying to the south of the A303, give the public greater access to the wider prehistoric landscape and improve the setting of the WHS, all of which will boost tourism in Wiltshire.
21. By upgrading the A303, improving journey times and accessibility to Wiltshire will help to boost tourism, increasing visitor expenditure, making Wiltshire more accessible to tourists, and potentially providing opportunities to promote Wiltshire’s strengths as a short break destination.

Conclusion on Tourism Considerations

22. The A303 scheme will have a twofold impact on tourism in Wiltshire. First, it will improve the setting of the WHS and access to the wider prehistoric landscape (see section below); second it will improve the accessibility of Wiltshire as a whole to tourists. This boost to tourism will clearly then have positive impacts on the economy of the county, and aligns very closely therefore with the economy-led Core Strategy.

Environmental Considerations

23. Wiltshire’s World Heritage Site (WHS) is a designated heritage asset of the highest international and national significance, and consists of two areas of approximately 25 sq km centred on Stonehenge and Avebury. It is internationally important for its complexes of outstanding prehistoric monuments. The setting of the WHS beyond its designated boundary also requires protection as inappropriate development here can have an adverse impact on the site and its attributes of Outstanding Universal Value (OUV).
24. The Spatial Vision of the Core Strategy writes that by 2026 (the end of the plan period), Wiltshire’s important natural, built and historic environment will have been safeguarded. Strategic Objective 5 seeks to protect and enhance the natural, historic and built environment and as part of this, the Stonehenge and Avebury World Heritage Site will be protected from inappropriate development and controlled in a way which sustains its OUV. One of the key outcomes for Strategic Objective 5 is that the WHS and its setting will have been protected from inappropriate development in order to sustain its OUV.
25. The area strategy for the Amesbury community area states that one of the specific issues to be addressed in this area relates to future improvements to the A303 and that the council will continue to work with partners to ensure that any future improvements to the A303 do not compromise the WHS.

26. Core Policy 58 aims to ensure that Wiltshire's important monuments, sites and landscapes and areas of historic and built heritage significance are protected and enhanced in order that they continue to make an important contribution to Wiltshire's environment and quality of life. Development should protect, conserve and where possible enhance the historic environment.
27. Core Policy 59 states that to sustain the OUV of the WHS opportunities will be sought that support the positive management of the WHS through development that, inter alia, reduces the negative impacts of road, traffic and visitor pressure.
28. Core Policy 6 also seeks to protect Stonehenge and its setting so as to sustain its OUV. It explains that new visitor facilities will be supported where they:
 - Return Stonehenge to a more respectful setting befitting its World Heritage Status;
 - Include measures to mitigate the negative impacts of the road.
29. Therefore it was always the case that the advent of the new visitor centre was only part of the overall vision and that reducing impact of the roads was critical.
30. The Core Strategy is clear, therefore, that sustaining the OUV of the WHS is a key consideration, and recognises that the A303 currently has a negative impact on the setting of the WHS. Currently, the A303 cuts through the middle of the WHS, and the roar of traffic and headlights are an intrusion on the peace and sanctity of Stonehenge, compromising its integrity and harming the setting of many monuments. The proposed tunnel would reconnect Stonehenge with the two-thirds of the WHS lying to the south of the A303 and currently cut off by it. The tunnel would make the setting of the ancient stone circle more tranquil, give the public greater access to the wider prehistoric landscape and improve the environment for wildlife.
31. However the decision makers in this instance [as a nationally significant infrastructure project, this scheme will be dealt with under the Development Consent Order (DCO)] will need to ensure that the planning balance is addressed in relation to the adopted policy supporting the scheme to upgrade the A303 for the economic benefits and removal of the road from view, against other policies of the plan which seek to ensure that new development does not do significant harm to the OUV of the WHS, ecology, landscape and residents. The Environmental Statement required to accompany the proposal must objectively scrutinise the potential impacts, such as the impacts the construction of the tunnel portals and expressway will have upon the WHS only once this assessment work has been completed and carefully considered can a decision on the planning balance be reached.

Conclusion on Environmental Considerations

32. Reducing the negative impact of the A303 on Stonehenge is a clear objective of the Core Strategy, as well as protecting its setting. The proposal represents an opportunity not only to remove the existing harm that the current A303 has on the WHS, but also to ensure significant benefit to the WHS, as well the natural environment.
33. Clearly, full and detailed Environmental and Heritage Impact Assessments will need to form part of the further work to be undertaken by Highways England, and detailed comments are provided below from specialist sections of Wiltshire Council to inform this work. Therefore while there is strategic support for the proposals in principle, the decision must be made on the application of a balanced judgement through comparing

the benefits that will accrue against the extent of any environmental harm that will occur and how this can or cannot be mitigated.

III. Highways and Transport Considerations

34. The consultation package includes a [Technical Appraisal Report](#) (TAR) setting out the background to the proposals for the improvement to the Amesbury to Berwick Down section of the A303.
35. Highways England, as the (DCO) developer for the scheme, has identified four Client Scheme Requirements. The first of these is the transport objective which states, in expanded form:
- *The road will be designed to modern standards and, in addition, to perform as an Expressway.*
 - *The design of the road and connections with the local network will address issues of congestion, resilience and reliability. It will reduce risk of traffic diverting onto local roads.*
 - *Road safety will be improved to at least the national average for a road of this type.*
36. The Council was involved in the determination of the Client Scheme Requirements, so it is reasonable to state that they are aligned with the Council's position. Past considerations by the Council have supported the provision of a tunnelled solution on a similar line to that now proposed. The extent of the problems caused for local residents affected by traffic diverting away from the A303 to avoid the regular congestion and delays on the route were highlighted in a report commissioned by the Council¹. Those findings have been included as evidence in the [TAR](#)

Traffic Capacity

37. It is clear from the information supplied in the [TAR](#) that the proposed scheme would provide adequate capacity on the A303 for forecast demand flows to beyond 2051. The benefits of providing adequate capacity immediately addresses the principal issues of concern ('rat-running') to the communities of Amesbury, Larkhill, Durrington and Bulford, by providing a faster route for through traffic than is provided for on any of the alternative routes. The [TAR](#) identifies at Section 10.2 the forecast reductions in traffic flows on the local alternative routes if the scheme should proceed.

Route Options

38. The consultation options, identified as Route Option D061 and Route Option D062, share a common route for the eastern section of the scheme, but offer alternative bypass option routes around Winterbourne Stoke; D061 provides for a northern bypass of the village and D062 a southern bypass. In terms of overall performance the [TAR](#) indicates that both options provide very similar transport benefits, and both routes are about 0.4km longer than the existing A303 between either end of the scheme.

Junctions

39. The scheme would provide grade separated junctions at the junctions with the two principal roads, the A345 (Countess) and the A360 (Longbarrow).

¹ A303 Routeing Study. Atkins Report - 2014

40. The A345 junction was previously designed to accommodate a flyover for the A303 mainline. It is proposed that the junction be lit only at the lower roundabout level. No details are yet available as to the control of the junction, but it is likely that the traffic signals will become redundant.
41. The existing services at Countess will be accessed by way of a new eastbound slip road from the roundabout. The entrance is very close to the roundabout and conspicuity is relatively poor; the Council would wish to be assured that as a slip road, with potentially greater urgency to accelerate to match mainline merge traffic speeds, this access will be appropriately modified and/or signed.
42. The D061 option would have a grade separated junction where the new line crosses the existing A303, with a link eastwards to connect with Longbarrow roundabout and the A360 and an arm connecting via the existing A303 to Winterbourne Stoke.
43. The D062 option provides for a new grade separated junction to the west side of the A360 (to be outside of the WHS). Access from Winterbourne Stoke to the A303 would be via the existing A303 route to Longbarrow roundabout then southwards to this junction.
44. In both options the existing Longbarrow roundabout would remain as a junction. However, its use would be substantially reduced and it would be appropriate that this junction be modified to reflect the loss of a material east facing arm (except perhaps for access to agricultural frontage and NMU use) and a substantial reduction in traffic volumes accessing Winterbourne Stoke on the western arm, and modifying approach arms on the A360.
45. It is stated that it is not intended to provide street lighting on the A360 junction, but safety issues will be addressed through formal processes, as details are pursued. Wiltshire Council, as a local highway authority, provides street lighting at roundabouts as a matter of policy, and this should be drawn to the attention of HE.
46. It is not intended that a junction be provided for Winterbourne Stoke at the western end of the scheme. This will result in benefits and disbenefits for the residents of and visitors to Winterbourne Stoke. On the one hand residents will need to travel eastwards to the A303/A360 junction in order to travel westwards on the A303, which will clearly add, by degree, to the journey times and costs of residents. On the other hand, the community will benefit from the maximum reduction in through traffic achievable. It is, of course, not a benefit to those businesses that rely on passing trade.
47. Consideration will need to be given to the need to review the layouts of the B3083 junctions with the detrunked A303. It is likely that the B3083 route will become a more attractive through route for local traffic because current difficulties in crossing the A303 through the village will have been removed. This is an issue the Council should discuss with Highways England, in consultation with the parish council.
48. The general location (but no detail as to geometry) of the junctions is shown in outline on the drawings at Appendix F of the [IAR](#). (Description of route options for further appraisal).

Public Rights of Way PRoWs

49. The option schemes will have an effect on public rights of way falling within the options corridor. As a result of the length of tunnelled section of road there are rights of way (e.g. Byways 11 and 12) which benefit from a reduction in severance due to the loss

of the existing live A303, or a reduction of traffic remaining on the route. Drawings at Appendix F of the [TAR](#) show all those PROWs adversely affected by the scheme. Paragraph 8.9.1 of the [TAR](#) identifies that Route Option D061 bisects five PROWs including two bridleways and three byways, and Route Option D062 bisects six PROWs including two footpaths, two bridleways and two byways.

50. It is possible that some routes affected by the bypass options for Winterbourne Stoke could be considered for diversion and/or combining to achieve common crossing points. Regardless, it is the responsibility of the Council to protect its rights of way, and to this end grade separated crossings of the A303 would be sought to provide for the greatest level of safety. At grade crossing points (such as occur at some other locations on dualled sections of the A303) are not desirable. The Council should make representations in this regard.
51. The thorny issue of traffic on Byway 12 is not addressed in the proposals, as it is not a directly related aspect of the scheme proposals. The Council, is a partner signatory of the Stonehenge and Avebury WHS Management Plan; Policy 6b of the Management Plan considers the need to address the damage caused by traffic on the byways in the WHS. It is likely that the amount of traffic finding its way onto Byway 12 following the closure of its junctions with the A303 will be minimal (access being available only from Druids Lodge Farm area and Durrington), and that the concerns for this Byway will have been largely addressed by default. The issue of prohibiting driving on the local byways was previously considered by the Council in 2011².

Tunnel Maintenance and Diversion Route

52. The nature of tunnels is that they require regular routine maintenance involving closure. The [TAR](#) indicates that regular maintenance of the bores will be undertaken at night when traffic flows are at their lowest. One bore would be maintained at a time, with either the other bore being used for contraflow traffic, or for traffic diverted from the closed bore being diverted to a different route.
53. The local diversion route for closures on the tunnelled section is the same as the route identified as a high load route, namely the A360/B3086/The Packway/A345. Whilst there is unlikely to be an issue in relation to capacity on this route for planned diversions, there are concerns about the B3086/The Packway crossroads junction. It is the officers' view that this junction should be modified to be better able to accommodate both planned and unplanned closures of the tunnel section as an integral part of the DCO proposals.
54. The aspiration of Government is that the A303 shall be an '[Expressway](#)'³, ('Expected to meet a minimum standard' – a dual carriageway that is safe, well-built and resilient to delay, and 'Subject to much clearer expectations over performance' – so Highways England is held to account for how well traffic is moving). Such routes use technology to facilitate e.g. regular variable message signs to aid the management of the route and assist the travelling public. At this stage there is no detail as to how such management arrangements would be intended to work either for the Amesbury to Berwick Down section of the A303 or to the east and west of the section. The Council should seek to understand how such messaging might affect drivers' route choices on Wiltshire roads when confronted with delay or diversion messages.

² REPORT TO WILTSHIRE COUNCIL FILE REF: DPI/T3915/11/20 Prohibition of Driving Order at Stonehenge November 2011

³ Action for Roads - A network for the 21st century. DfT July 2013, p34

55. Planned closures of the tunnels can be signed remotely at both eastern and western approaches, so that long distance drivers have the opportunity to take alternative high standard routes, such as the M4/M5. Inevitably, however, especially with unplanned closures, the volume of traffic using the alternative route could be material, and have adverse environmental impacts on the Larkhill community. Whilst there should be no serious concerns about the route being used for high loads (above 5.03m, and relatively uncommon), the Council should seek further information on the potential effects on the diversion route from general diverted traffic.

Detrunking Issues

56. The consultation options provide for the closure of the existing A303 to general traffic between Countess and Longbarrow junctions. Some parts of the redundant A303 will be used for general access, such as the length to the east of Winterbourne Stoke to Longbarrow. The existing road, where superseded by the new route, will be 'detrunked', downgraded or stopped up as circumstances require. Whichever way, those redundant sections of road will revert either to the Council as the local highway authority, or to private interests if stopped up. There are sections of the road which serve only private interests for vehicular access, including, for example, access to Stonehenge Cottages and to agricultural land. No detail is provided in the [TAR](#) in relation to the intentions for Old Stonehenge Road, but the road could provide a potential access to some local private frontagers, including the Stonehenge Cottages and the top of the eastern portal.
57. The scheme details do not seek to identify the end uses of all parts of the road, but suggest that sections will need to be kept open for local use, including potentially being available for use by non-motorised users to improve access to parts of the WHS. For those sections which fall to the responsibility of the Council under DCO detrunking procedures, it is normal practice for the LHA to be compensated by HE for the additional maintenance burden the roads will present to the Council. The Council therefore needs to have agreed, when the DCO application is submitted, what the compensatory arrangements will be and what will be the end uses of all redundant sections of the A303 route.

Excavated Materials

58. A balance of cut and fill materials on the site will be a principal objective. The tunnels will either be bored with a tunnel boring machine (TBM) or excavated by other means internally if a sprayed concrete lining is used. In either event a considerable amount of material will be removed from the tunnel bores as a result. If a TBM is used there is uncertainty as to the potential re-use of the arisings. If a sprayed concrete lining is used, then excavated material is likely to be suitable as embankment fill material. If TBM arisings have to be removed from site there could be a considerable impacts on local haul roads. In such circumstances the Council should seek to protect its roads under the legal provisions available at [s59 of Highways Act 1980](#), through agreement with HE

Traffic Regulation Orders

59. Highways England have advised that Traffic Regulation Orders can be included in the DCO process provided they are part of the project. [The Planning Act S2008, s33\(4\)](#), requires, in effect, that orders which would otherwise be made under provisions of the 1980 Highways Act (under sections 10, 14, 16, s18, 106, 108 and 110) cannot be made outside the DCO application; TROs are made under the provisions of the [Road Traffic Regulation Act 1984](#), and therefore not precluded outside of the DCO process. The

Council will need to be assured, before the DCO application is made, that all identified necessary TROs are indeed included in the process, in particular that it is not left for the Council to address TROs necessary to regulate traffic on the existing county road network, or on any de-trunked sections of the existing A303.

Winterbourne Stoke Route Option Preference

60. Route options D061 and 062 provide similar overall benefits. The D061 option is stated in the consultation documents as having a more problematic junction arrangement for access to the A360, because it would involve a grade separated junction on the live existing A303 route. The D062 option provides for an off-line grade separated junction for the A360, which would involve more straightforward construction. For Winterbourne Stoke villagers wishing to access the A360 (north and south), both options are similar. However, for trips requiring access to the A303 the north side route would provide a materially shorter route, because its junction would be circa 2.5 km closer to the village centre than the south bypass option.
61. Notwithstanding the issues identified with construction, or other issues raised in this report on archaeological, ecological or other grounds, it would appear that the north bypass option would best suit the travel needs for Winterbourne Stoke A303 users. The two routes around Winterbourne Stoke are likely to have different effects on traffic use of the B3083, with consequential impacts on e.g. Berwick St James for A36 access. Local traffic management might be appropriate to impose a degree of control on traffic types using the road.
62. In broad terms, there appears to be no over-riding case, from a transport perspective, to favour Route Option D061 over D062; HE should be asked to favour the most sustainable route in terms of minimising total vehicle-kilometres, all other matters being equal.

Summary on Highways and Transport issues

63. Wiltshire Council Highways and Transport has worked closely with Highways England in developing the proposals and is satisfied with the proposals in general. However, the Council anticipates a number of aspects will have to be resolved with Highways England if adversarial representation to the Examination by the Planning Inspectorate is to be avoided following submission of the DCO application:
 - Impact of the scheme on the local road network, including any TROs to regulate use of former A303, and agreement under s59 Highways Act 1980 in relation to non-A303 haul routes.
 - Design of local road elements of the scheme, including appropriate alterations of junctions as appropriate
 - Surface water drainage
 - Rights of way and access, including segregated crossings
 - De-trunking and transfer of former Highways England assets to Wiltshire Council
 - Improvements to and signing for tunnel and route diversions
 - Requirements for local Traffic Regulation Orders

IV. Public Health and Public Protection Considerations

64. There are a number of potential impacts that the construction and operational phases of the A303 Amesbury to Berwick Down project may have on the local area in terms of environmental health.
65. Identifying and addressing these at an early stage will allow practical mitigation measures to be built in to the scheme.
66. The public consultation document does not currently give sufficient detail in respect to these issues, as it is still relatively early in the project planning stage. However, as the project develops we would expect the following issues to be addressed to minimise the impact of the scheme.
67. It is acknowledged that this is early to be submitting full comments so the public protection service would reserve the opportunity to make further comment as more detailed information emerges.

Noise and Vibration

- Impact from road and tunnel construction including hours of work, vibration (tunnelling and piling operations), positioning of work compounds and plant and vehicle storage
- Long term impact from traffic noise particularly on elevated sections and where future development may introduce new dwellings adjacent to the new route

Private Water Supplies

- The Council is responsible for monitoring and risk assessing several private water supplies in Winterbourne Stoke which provide drinking water to a number of properties. The water supplies and associated hydrology and land drainage need to be protected from any impacts from both the construction and operational phases of the scheme

Air Quality

- Impact from both the construction phase and long term traffic related pollution at relevant exposure (residential properties)

Dust Control

- Impact from the construction phase particularly during the summer months (soil stripping, spoil disposal, creation of cuttings and bunds)

Light Nuisance

- Impact of artificial lighting (for working and security) during the construction phase and operation phase.

V. Ecology Considerations

68. The proposed scheme has the potential to have effects on a number of European nature conservation designations including the River Avon SAC, Salisbury Plain SPA / SAC, Mottisfont Bats SAC and Chilmark Quarries SAC; effects upon these sites will need to be assessed in accordance with Regulation 61 of the Habitats Regulations. The assessment will need to consider direct effects such as the river crossings over

the Avon and the Till and indirect effects on functionality linked land which may be used by mobile qualifying features which occur outside of the designation boundaries. One particular issue to be addressed is likely to be the presence of phosphatic chalk geology in the general area which the tunnel will pass through, and any impact on aquifers and downstream watercourses needs to be controlled, while careful consideration will also need to be given to how any phosphatic chalk overburden might be safely reused in the local area, or whether this material will need to be disposed of elsewhere. The assessment will also need to consider in-combination effects from other relevant plans and projects in the area such as the Wiltshire Core Strategy and the Army Basing Programme.

69. The two options for the Winterbourne Stoke bypass appear broadly similar in terms of potential impacts upon the River Till, however the impact would depend upon the detailed topography and engineering design at either location. The northern routes will bring the road very close to Parsonage Down NNR / SAC, introducing potential impacts upon sensitive chalk grassland and populations of marsh fritillary butterflies, while the southern route would avoid such impacts.
70. The scheme is also likely to impact on a number of locally important County Wildlife Sites, priority habitats and protected / priority / notable species. The final route and detailed design should take full account of these features to ensure that impacts are avoided wherever possible and mitigated where impacts cannot reasonably be avoided. Compensation should be provided as a last resort for any residual impacts which cannot be avoided or mitigated fully.
71. Opportunities for ecological enhancement should also be sought where possible, for example road cutting and use of chalk overburden from the tunnel provide opportunities to create areas of new chalk grassland habitat in the local area.

VI. Landscape Considerations

72. Overall the undergrounding of the A303 through the World Heritage Site will bring large landscape benefits; through the reconnection of physical landscapes and the improved setting and experience of the monuments and OUV. The landscape and visual impacts of the portals can be minimised by testing the different design options that best fit with buried and upstanding archaeological remains. There will be 2km of residual landscape severance within the WHS where the A303 enters the portals at either end of the tunnel.
73. To the west of the tunnel the scheme aspires to create a bypass for the village of Winterbourne Stoke with north and south alternative routes. The northern by pass would place the road further away from Listed buildings and the conservation area of Winterbourne Stoke. The character of the route is typical of the downland landscape that the A303 passes through either side of the tunnel. Although the route passes close to Parsonage Down and some burial mounds, few landscape elements will be removed. Construction would also include a bridge over the River Till and some means of maintaining connectivity for the B3083 and PROWs.
74. The southern route passes between Winterbourne Stoke and Berwick St James, introducing noise and visual intrusion into a quiet tranquil section of the River Till Valley. It will create a perceived severance between the communities and result in a substantial loss of landscape elements. The road would have a strong influence over both villages which might require measures for acoustic and visual mitigation.

75. Therefore, the preferred bypass option at this stage, would be for the Northern route due to the perceived less adverse effects on loss of landscape and visual amenity to local residents.

VII. Public Rights of Way (PROWs) Considerations

76. It is Wiltshire Council's statutory duty to protect the rights of the public to use highways. These highways include public rights of way. We should therefore seek to retain existing rights and, where roads are stopped up, retain appropriate public rights of way along these routes.

Stonehenge Tunnel Area

77. There are a number of north-south public rights of way which cross or terminate at the A303. The A303 currently provides an east-west highway link between these rights of way, however, most rights of way users at the moment would not use the route to link between them. The removal of road traffic can provide new opportunities for users of non-mechanically propelled vehicles (mpv) to explore the Stonehenge landscape, in line with the aspirations of the management plan. The connectivity currently provided by the A303 from West Amesbury (Stonehenge Road) through to byway AMES11 should be retained after the road is removed.

1) AMES44 (bridleway, Ratfyn crossing) – this connection should be maintained, even if the proposed alterations at Countess Roundabout may have some impact

2) AMES10 (bridleway) – should be unaffected by the proposals

3) AMES13 (footpath) – should be unaffected by the proposals

4) AMES11 (BOAT) – ends at A303. The connectivity between the end of AMES11 and AMES12 should be maintained in order to link rights of way of equal status together to avoid creating dead-end routes, or an alternative and equally convenient link between these two byways should be provided.

5) AMES12 / WCLA1 (BOAT) – should be retained on its current line. Although use of this byway by mpv's causes some damage to the surface, which can spoil the experience for other users, the route is vital as it provides sustainable north-south access through the WHS. The closure of the A303 and A344 may lead to an increase in use of the BOAT by mpv's. This is because it will be the only means by which those who cannot use other forms of transport can enjoy a reasonably close view of the henge without entering through the visitor centre and taking the shuttle buses. As has been demonstrated by the recent closure of one road, the A344, this inevitably puts pressure on the remaining PROW of commensurate status. The planning requirements for the Stonehenge visitor centre took this into account with regard to providing sustainable access from the North along byway 12 (Larkhill) and a condition was added to ensure that it was made fit for purpose by EH. The tunnelling of the A303 will effectively remove a much greater link from the existing network and it should be anticipated that additional pressures will be placed onto the remaining byways-by all classifications of users. The tunnelling of the A303 will remove Stonehenge itself from the nation's gaze, casual viewing pleasure and their deeper subjective connection with the monument and this should not be underestimated.

6) Easy pedestrian access to the King Barrows should be retained. There is currently a small parking area just east of the Longbarrow roundabout; consideration should be

given to retain this and possibly extend to provide this access as it is on the periphery of the WHS

7) Formal public access should be retained along the line of the A303 from the Longbarrow roundabout to AMES12. The route should be dedicated as a restricted byway, again to provide access for carriage drivers.

Northern Bypass Route

- 1) WSTO6A – appears to be unaffected
- 2) WSTO6B – might go underneath the proposed bridge, if not connectivity should be maintained
- 3) WSTO4 – appears this would run underneath the proposed bridge, if not connectivity should be maintained
- 4) WSTO3 – appears to be unaffected

Southern Bypass Route

- 1) BSJA9 – appears to be unaffected
- 2) BSJA6 and BSJA8 – appears this would go underneath the proposed bridge, if not connectivity should be maintained
- 3) BSJA10 (BOAT) – might go underneath the proposed bridge, if not connectivity should be maintained
- 4) BSJA3 (bridleway) and BSJA3A (BOAT) – these routes currently terminate at the A303. It would be acceptable to stop up BSJA3. BSJA3A should be linked across to SLAN3 so users would not need to access the A303

VIII. Archaeology and World Heritage Site Considerations

Background and Policy Context

78. The Wiltshire Council Archaeology Service has a statutory duty to advise on the impact of development proposals on archaeological remains in the County, both within and outside of the Stonehenge and Avebury World Heritage Site (WHS). We take into consideration direct physical impacts on known and potential designated and undesignated heritage assets, issues of setting and visual impact, and in the case of the WHS, possible impact on the attributes of Outstanding Universal Value (OUV). In relation to the A303 Improvement Scheme (the Scheme) we will also have a responsibility for the monitoring and discharge of archaeological conditions/requirements imposed as part of the Development Consent Order (DCO).
79. In addition to our formal statutory role we have been engaged with the Scheme's development over the last few months via a number of working groups associated with the Scheme such as the Natural and Cultural Heritage Working Group, the International Council on Monuments and Sites (ICOMOS) Working Group (set up to respond to issues raised in the initial ICOMOS International Advisory visit in the Autumn of 2015 and subsequent report) and the Heritage Monitoring and Advisory Group.

80. The Council co-funds (with Historic England) and hosts the WHS Coordination Unit within the Archaeology Service. The Unit currently consists of a WHS Partnership Manager and a WHS Partnership Officer tasked with implementing the policies and objectives in the WHS Management Plan.
81. In assessing the potential development impacts of the Scheme as mentioned above, the Archaeology Service is obliged to assess the Scheme in relation to a number of policy documents including:
- The 2015 Stonehenge and Avebury WHS Management Plan with its key policies of protection and enhancement of the Outstanding Universal Values of the WHS. This plan has been formally endorsed and adopted by Wiltshire Council in 2015
 - The Wiltshire Core Strategy (2015) includes a specific robust policy (Policy 59) to ensure the protection of the WHS and its setting from inappropriate Development in order to sustain its outstanding universal value
 - National Planning Policy Framework (NPPF 2012) para 132 and Practice Guidance Further Guidance on World Heritage Sites (2014). These documents set out that substantial harm to or loss of designated heritage assets of the highest significance should be wholly exceptional
 - The ICOMOS Guidance on Heritage Impact Assessments for Cultural Properties (2011). This is designed to inform the assessment of possible development impacts in relation to Outstanding Universal Value.

Route Options Appraisals – The Technical Appraisal Reports

82. We have appraised the information presented in the Technical Appraisal Report (TAR), concentrating on the Design Fix C options, D61 and D62 tunnel with Winterbourne Stoke bypass (Option1N and 1S) and F10 (at grade bypass south of the WHS).

Client Scheme Requirement Assessment (CSR) and Policy Objectives

83. This assessment looks at options in relation to the four client scheme requirements Transport, Economic Growth, Environment and Economy and Cultural Heritage (*to contribute to the conservation and enhancement of the WHS by improving access both within and to the site*). Each of the options is scored in relation to how strongly they align to meeting the objective.
84. It is clear from the TAR that option F10 scores higher than the other options against the cultural heritage objective, being strongly aligned to this objective. It does not introduce any new infrastructure within the boundaries of the WHS, and is a better fit with Wiltshire Core Strategy heritage objectives and WHS Management Plan. For these reasons, as well as the importance of protecting the OUV of the WHS, the archaeological service would have liked this option to have been included in the public consultation.
85. Both options promoted in the consultation would remove the existing A303 and the sight and sound of associated road noise from a key part of the WHS, providing a significant improvement to the setting of the WHS and allowing for better access. Both options will also allow for the reconnection of the Avenue which is currently severed by the A303.

Appraisal Summary Tables (ASTs)

86. These are summary scores coming out of the WEBTAG assessment criteria which includes economic, environmental (including historic environment) and social and financial objectives. In the historic environment and the WHS object the overall score for D61 and D62 are considered to have Neutral to Moderate benefit.

The Consultation Scheme D61 and D62: Issues and concerns

Eastern end of Proposed Scheme

87. This part of the Scheme, especially in the vicinity of Countess Roundabout is archaeologically sensitive. It is currently unclear what the impacts may be in terms of road widening, new access roads and other construction impacts. Once further design details have been developed this area will need to be assessed, including potential visual impacts on Vespasian's Camp.

Eastern Portal

88. We welcome the proposed location of the Eastern Portal to the East rather than West of the line of the Avenue. This is beneficial compared to the previously consented tunnel scheme. Although the immediate area for the proposed portal does not appear from the evaluation to contain highly significant archaeological remains (see evaluation section below), the surrounding area has many prehistoric burial mounds and ring ditches, both scheduled and unscheduled. The direct and indirect and visual impact of the construction of the Portal on these monuments will need to be assessed, as will the potential damage caused by any access road requirement and other construction impacts. The most concerning issue here is the proposed close proximity of the Portal to the Avenue and the visual impact the portal may have on the settling of not only the Avenue but the designated and undesignated barrows in this area and in particular the King Barrow Ridge Group. Careful design and mitigation will be required in this area.

Western Portal

89. The footprint of the proposed portal has been evaluated and no highly significant features found. There are linear features relating to probable prehistoric field systems and one substantial linear feature which are scheduled elsewhere. The issue for the portal is its location on a slightly elevated ridge position which will have an adverse visual impact on the nearby Normanton Barrow Group and the more distant Winterbourne Stoke Group to the North West. If a portal in this general area is to be acceptable it would have to be redesigned or mitigated to minimise these adverse visual impacts on attributes of OUV.

D61 Expressway, Bypass North of Winterbourne Stoke

90. No evaluation has been done on this proposed route within the WHS. Outside the WHS some assessment work was carried in 2001 North of Winterbourne Stoke in relation to the previous tunnel and bypass scheme. The route would have a direct impact on an upstanding prehistoric boundary earthwork which is a Scheduled Monument and considered to be of national significance, and then it goes through Diamond Wood, an area of high archaeological potential that has not been evaluated. Moreover, the route is projected to bisect the two recently discovered Neolithic long barrows which must be considered as an adverse impact on attributes of OUV.
91. As it runs westwards out of the WHS it passes through the remains of known ancient field system and the edge of settlement remains to the North East of Oatlands Hill. As it passes to the north of the A303 there are field systems and water meadows and a major water meadow system at the proposed River Till crossing. There is high

archaeological potential as the route passes just to the south of Parsonage Down close to an Iron Age settlement and a complex of prehistoric pits close to the proposed link into the A303.

92. If this proposed road is at grade there is still potential adverse visual impact within the WHS on the Lake and Normanton Down Barrow Groups. The proposed junction with the A360 1 km west of the WHS boundary is in an area of high archaeological potential (not evaluated yet) with a potential adverse visual impact on the Winterbourne Stoke Barrow Group.

D62 Expressway, Bypass South of Winterbourne Stoke

93. No archaeological evaluation has yet been undertaken for the proposed expressway leading out of the proposed western portal, either within or outside of the WHS. In general we know less about this route in terms of archaeology than the D61 route.
94. Within the WHS the route crosses a known upstanding prehistoric boundary earthwork which is a Scheduled Monument and considered to be of national significance. It also crosses an area of probable prehistoric field system and where it goes through Diamond Wood, an area of high archaeological potential. Outside of the WHS boundary the proposed road seems to avoid areas of known significant archaeology, passing south of Oatlands Hill although there are some linear features and a possible ring ditch along the route south of Winterbourne Stoke. There is a proposed new road junction just outside the WHS boundary within the Park area. This is just north of a complex of Iron Age enclosures and there is high potential for further remains in the area of the junction.
95. This route has the advantage over D61 being located in a lower area with less potential visual impact. However, if the road is at grade there is still potential adverse visual impact within the WHS on the Lake and Normanton Down Barrow Groups, and there is a potential adverse visual impact from the proposed junction with the A360.
96. With both of these proposed expressway routes we are concerned about how the large tunnel machinery is going to access the western portion of the WHS where there are lots of buried and upstanding archaeological remains. We would want to see details of this within the DCO applications along with the impact assessment of all temporary construction impacts.

Solstice Alignments and Dark Skies

97. None of the documents which accompany the non-statutory consultation consider the effects of the D61 and D62 on the astronomical element of the OUV of the Stonehenge part of the WHS. The significance of Stonehenge and associated monuments in relation to solstitial alignments is a key feature in the WHS nomination document and is recognised as an attribute of the OUV of the site. Policy 1e of the 2015 WHS Management Plan states the need to *minimise light pollution to avoid adverse impacts on the WHS, its setting and its attributes of OUV.*
98. The latest consideration of the Solstice alignments at Stonehenge by Clive Ruggles has suggested that it may be the winter sunset solstice alignment which is actually more significant than mid-summer sunrise. He has suggested that the approach to Stonehenge via the Avenue puts the viewer directly on the alignment of the Winter sunset, framed by the stones within the henge.
99. The alignments of both D61 and D62, from where they exit the western portal until they pass over Oatlands Hill, have the potential to affect this highly significant element of OUV, an element which has not been previously disturbed by the existing A303. In

particular, the proposed grade separated junction with the A360 on D62 is directly on the line of the Winter solstice and so has the potential to affect the view. Light from car headlights and any road lighting is also an issue that needs to be considered.

100. This highly significant element of OUV has not been considered in the documents submitted for the Non-Statutory consultation, and so it calls into question the overall slightly beneficial score given to these routes on this criteria.
101. On the whole D61 (North of Winterbourne Stoke) is less desirable in our view in terms of impact on the OUV. However, there are major issues with D62 (solstitial alignment, position of Western Portal, impact of expressway) that would need to be addressed as the scheme is developed.

Excavated Materials/Spoil from Tunnel

102. Whichever method of tunnel boring is used will result in a great quantity of spoil. The disposing of spoil to build up areas within the WHS may be difficult on heritage grounds, as may the disposing of it in archaeologically sensitive areas outside of the WHS, also we will need to have evaluation of areas for temporary storage of spoil.

Archaeological Evaluation

103. Some archaeological evaluation has started to be undertaken in relation to the proposed tunnel scheme but only within the WHS boundary. The evaluation has involved non-intrusive studies and surveys in the first instance including aerial photographic survey and geophysical surveys. Both magnetometer and Ground Penetrating Radar (GPR) techniques have been used in parts of the evaluated areas. Use has also been made of the results of recent archaeological research undertaken by Historic England in the southern part of the WHS (written reports pending).
104. To date trial trenching has been undertaken in three areas of the WHS which could be impacted by the proposed tunnel schemes. The location of the trenches in these areas have been guided by the results of the geophysical surveys. Area NE2 is just north of the A303 at the end of the WHS. Where the proposed location of the East Portal is proposed 27 trenches have been recently excavated (report pending). The only archaeologically significant feature found was an undated ditch which is likely to be part of a prehistoric field system as marked on the Historic Environment Record.
105. In the South West part of the WHS two further areas have had trial trenching. SW1 had 35 trenches and mainly located the remains of ditches (probably traces of prehistoric field systems). There was one previously known large linear feature known as a Wessex Linear, a Late Bronze age or early Iron Age boundary. This is the area that has been proposed for the location of the Western Portal.
106. SW2 is located close to the western boundary of the WHS (where part of the proposed expressway for D62) and had 32 trenches. The trenches identified some highly significant archaeological remains which are considered as attributes of OUV. It confirmed the presence of two Early Neolithic Long Barrows and a penannular ditched enclosure with two cremation burials dating to the Late Neolithic. The proposed Expressway for D61 is currently bisecting the two Long Barrows.

Archaeological Evaluation: Further Requirements

107. A considerable amount of archaeological evaluation, both within and outside of the WHS is still required before the submission of the DCO. We would advise that this is undertaken as early as possible so the results can be used to help influence the final

design of the Scheme that gets taken forward and will feed into the Environmental Assessments. The evaluation will need to include not only total coverage of the proposed expressways but also the proposed road junction areas outside of the WHS and all drainage areas, attenuation ponds, aquifer etc. We will also require all proposed construction impact such as access roads, compounds, temporary spoil storage areas to be evaluated in advance of the submission of the DCO.

Archaeological Assessments: Further Requirements

108. We would expect to see a full and detailed Environmental Statement submitted with the DCO covering all aspects of the historic environment. This should also include a full assessment on the impact of OUV carried out in accordance with the ICOMOS Guidance on Heritage Impact Assessments for Cultural Properties (2011). This assessment has not yet been done in relation to the Scheme.
109. Construction impacts and temporary impacts will need to be assessed in same way as permanent impacts (direct and indirect).

Summary of Archaeology and Historic Environment Issues

110. Wiltshire Council Archaeology Service over the last few months has worked in conjunction with other heritage agencies and Highways England in developing the option proposals. What we can say here is still outline and limited as detailed design of the scheme has not yet been done and the archaeological/historic environment evaluation and assessments are not completed.
111. It is clear that the removal of the A303 through the World Heritage Site (WHS) inherent in all of the assessed schemes will bring huge benefits for the centre of the WHS. With the proposed tunnel options D61 and D62 the position of the Eastern Portal to the east of the Avenue brings the benefit of being able to reunite the currently severed line of this important monument.
112. There are significant issues and risks with the proposed tunnel scheme for proposed options, D61 and D62. In their current form we consider both options have potential of adverse impacts on OUV which outweigh the benefits of the scheme especially in relation to the location of the western portal and expressway.
113. Either scheme would require a significant amount of further evaluation and assessment and would require a significant amount of archaeological mitigation both inside and outside of the WHS. This may have financial implications and impact on the timescale for delivery of the project and needs to be considered as part of ongoing evaluation/assessment/design work should the project go forward.
114. However, on present evidence it *may* be possible that with some re-design and mitigation the south of Winterbourne Stoke bypass option D62 may be considered *marginally beneficial* for heritage compared with D61 and the current baseline situation, but the following issues should be resolved prior to the DCO submission.
 - The Eastern portal location and design developed to minimise proximity and visual impact on the Avenue and King Barrow Ridge
 - The design and location of the Western portal, expressway and junctions are developed/amended to avoid the current predicted major adverse impact on heritage and outstanding universal value especially in relation to the Scheduled Barrow Groups and other attributes of OUV

- The expressway and junction alignments do not adversely impact on Solstitial alignments
- All required archaeological evaluation assessment within and outside WHS are completed in time to feed into the assessment work and submission of the DCO.
- Mitigation measures will be in place to offset potential adverse impact on OUV and other significant heritage assets.

IX. Built Heritage Considerations

115. The comments below highlight the elements of the historic built environment that may be affected by the proposed road schemes between Countess Roundabout and west of Winterbourne Stoke.

Countess Roundabout (A345) Flyover to Eastern Tunnel Entrance

116. The grade II* registered park of Amesbury Abbey (itself grade I listed), specifically the section known as Lords' Walk, abuts the A303 embankment by the footbridge about 500m east of the roundabout, and close to the start of the anticipated ramp of the flyover. The differing levels and limited intervisibility suggest that there would be little or no change to the setting of the RPG.
117. 10m NW of the roundabout lies Countess Farm, a group of six grade II listed buildings including the C17 farmhouse. The setting of these buildings has long been affected by the road's presence, but the scale of the flyover structure and its inevitably urban character is likely to have a significant, potentially overbearing, impact, and form a more solid physical and visual barrier between the farm and the town of Amesbury.
118. 35m S of the roundabout lies a grade II listed stone bridge over the Avon. This bridge lies in a corner between the wall of the park and the modern A345; its setting would be affected but I would suggest this to be at the lower end of 'less than substantial harm' (as defined by NPPF).
119. On the A345 roadside 120m S of the roundabout lies Diana's House, a grade II* listed former lodge to the Abbey. The northern outlook from this important building would be adversely affected, but not to a level of substantial harm to the listed building or its immediate setting.
120. Amesbury Conservation Area abuts the A303 along its southern side for a distance of 900m west of the roundabout, to the western edge of 'Vespasian's Camp'. All of this land is also within the Abbey's registered park, and contains several grade II* listed structures. The proposal appears to move the dual carriageway slightly further from the edge of the CA and RPG, before entering into the tunnel 400m to the west of the CA boundary, also about 400m to the north of the small village of West Amesbury which has its own CA and grade I listed W Amesbury House. There would be no additional adverse impacts on the designated built heritage assets, and there probably would be some benefits of noise reduction in West Amesbury. The removal of access to the A303 using Stonehenge Rd from the upper Woodford valley will presumably need to be addressed, although no proposal is shown.
121. Stonehenge Cottages. These early C20 thatched cottages (unlisted) lie on the N side of the current A303, and their setting would be much improved as the proposed tunnel would pass underneath them.

Winterbourne Stoke, Northern Bypass Option from Western Tunnel Entrance

122. The northern option crosses the A360 in open farmland, then the A303 northward and descends to the Till valley floor with embankments and a bridge, before cutting across fields to the NW of the village and rejoining the existing route. There are no known heritage assets whose setting would be adversely visually affected by this route. A good quality undesignated cartshed at Foredown Barn would be 550m from the new road, some 300m closer than currently, and brought into greater public view. The building may be worthy of listing, but the slightly increased impact on this isolated building would clearly be outweighed by other heritage benefits.
123. Winterbourne Stoke Conservation Area abuts the southern side of the A303, although in reality this is only to include the grounds of the grade II* Manor House and its curtilage structures, all in very close proximity to the existing road. The remainder of the CA lies to the south focused along Church St. The existing A303 has little direct impact on most of the CA, although it does limit local movement, and generates a level of noise – limited by reduced traffic speeds. The noise level of the new bypass could be significant in its impact on the relatively quiet nature of the CA at present, depending on the surfacing materials and detail of cuttings and embankments, although the increased distance from the edge of the CA would provide some mitigation. There would be a significant improvement in the visual setting of the Manor House.

Winterbourne Stoke, Southern Bypass Option from Western Tunnel Entrance

124. The southern option crosses the A360 and bisects a large historic landscape feature known as 'The Park' on C19 maps. The four-sided 35ha Park is currently in arable use, with a thick wooded boundary on each side. While not a built heritage asset, this is clearly a notable manmade landscape feature, possibly associated with the historic farms nearby, whose significance should be explored further if this route option is pursued.
125. The collection of farm buildings immediately to the west of The Park is entirely modern.
126. Asserton Farm, 400m S of proposed route, while containing no listed buildings, is largely C19. The primary impact on this site would be noise.
127. New bridge over Till, approx. 600m S of the southern boundary of Winterbourne Stoke CA, and new embankments heading NW to rejoin existing carriageway. The grade II* listed church, adjacent grade II Old Rectory and Church Cottage abut the southern CA boundary and can be clearly seen from the crossing points of the river and the Winterbourne Stoke/Berwick St James road. The land to the south of the CA is level and the road and bridge would clearly intrude into this rural setting, both visually and aurally.
128. 300m to the south of the bridge lies an unlisted thatched cottage (C19 or earlier), White Lodge, whose tranquil rural setting would be severely compromised.
129. Asserton House, a grade II listed building, lies approx. 450m to the south of this route.
130. The southern route passes about 450m to the N of Berwick St James CA. Currently the road noise from the A303 has little impact on the historic character of this CA, whereas the introduction of the dual-carriageway across the open landscape of the river valley would have a significant adverse visual and aural impact.
131. This option also offers significant improvements to the setting of the Manor House at the northern edge of the CA.

132. Therefore, in light of the above, the Northern bypass route would be the preferred option at the present time.

X. Flood Risk and Drainage Considerations

133. Wiltshire Council will have to give consent as Lead Local Flood Authority (LLFA) for ground water and land drainage after assessing the flood risk. Once the framework has been agreed it may be necessary to have the information peer reviewed via our consultants, which is subject to ongoing discussions with Highways England relating to methodology and costs.
134. The Environment Agency will approve some of the design for water quality, licensing etc., however the greater part of the consenting process will remain with Wiltshire Council.
135. Further information has been requested on the A303 scheme for ground water and drainage as there is only an outline plan available to date.
136. The Council needs to ensure that the temporary proposals and permanent solutions have adequately considered all flood and draining considerations, including how it will function once its constructed. It will be imperative to ensure that this scheme does not increase the flood risk anywhere else as a result.

XI. Procedural Issues and Next Steps

137. As a nationally significant infrastructure project, this scheme will be dealt with under the Development Consent Order (DCO) process. The role of the Council within this process is therefore as a statutory consultee. The Council has considered its position on a number of aspects as set out in this non-statutory consultation response. The Council wish to make clear to Highways England that it is fully committed to the DCO process, and supports this proposal in principle, but subject to the making of a objective balanced planning judgement in relation to the outputs of the assessments necessary to address the detailed comments set out in this consultation response. The Council asks that Highways England takes these comments into full consideration.