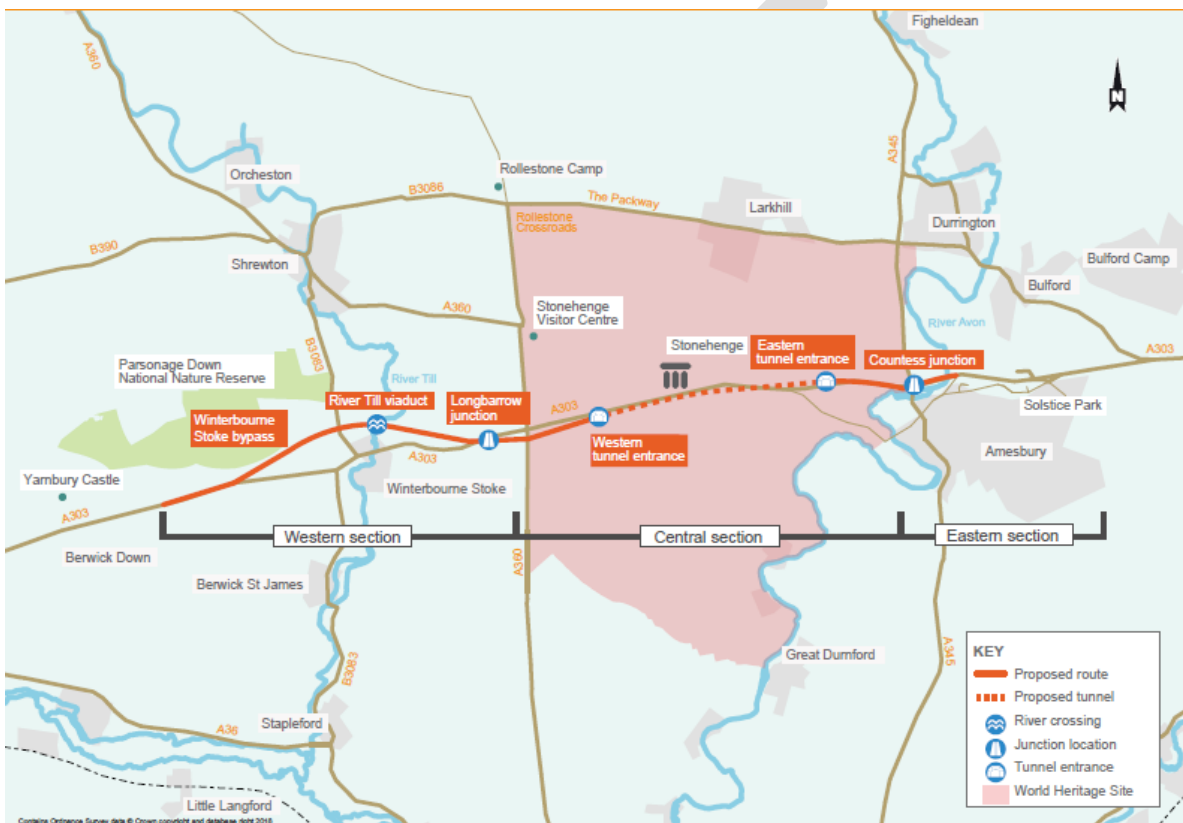


A303 Amesbury to Berwick Down (Stonehenge)



Wiltshire Council Response to Statutory Consultation

April 2018

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1. Acronyms and Abbreviations

Acronym / Abbreviation	Meaning / Description
A303	Route pre- and post- proposals
AADT	Annual Average Daily Traffic
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BOAT	Byway Open to All Traffic (as Restricted Byway but also includes mechanically propelled vehicles although mainly used as FP, BW, RB)
BW	Public Bridleway (pedestrians, horse-riders and bicycles)
CA	Conservation Area
CEMP	Construction Environmental Management Plan
DCO	Development Consent Order
DfT	Department for Transport
EA	Environmental Assessment
EIA	Environmental Impact Assessment
ES	Environmental Statement
FP	Public Footpath (pedestrians only)
HE	Highways England
HIA	Heritage Impact Assessment
ICOMOS	International Council on Monuments and Sites
LEMP	Landscape and Ecological Management Plan
LLFA	Lead Local Flood Authority
LVIA	Landscape and Visual Impact Assessment
MoD	Ministry of Defence
MPV	Mechanically Propelled Vehicle
New A303	Route proposed in this consultation
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NRMM	Non-Road Mobile Machinery
NSIP	Nationally Significant Infrastructure Project
Old A303	Existing route
OUV	Outstanding Universal Value
PEIR	Preliminary Environmental Information Report
PROW	Public Rights of Way
RB	Restricted Byway (pedestrians, horse-riders, and non-mechanically propelled vehicles, includes horse-drawn vehicles and bicycles)
SoS	Secretary of State
SuDS	Sustainable Drainage System
TBM	Tunnel Boring Machine
TRO	Traffic Regulation Order
VPD	Vehicles Per Day
WCAS	Wiltshire Council Archaeology Service
WCS	Wiltshire Core Strategy
WFD	Water Framework Directive
WHS	World Heritage Site

2. Introduction and Context

1. Highways England (HE) is carrying out pre-application consultation on the dualling of the A303 and their preferred option of a tunnel following a similar line to the existing surface road, between 8 February 2018 and 23 April 2018. The proposal which is the subject of this consultation raises many considerations for the Council, which can be summarised into five key areas:
 - a) Proposal compliance with the strategy for this area of Wiltshire as set out in the Wiltshire Core Strategy (WCS) and within the context of relevant National Policy Statement (NPS) on infrastructure delivery and the wider planning context provided by the National Planning Policy Framework (NPPF).
 - b) The technical issues raised by the proposal and what, if any, mitigation should be required as a consequence of any potential impacts
 - c) Requirements to be applied to the Development Consent Order (DCO)
 - d) Any 'orders' or 'agreements' which should be required to implement any changes and ensure these are included within the DCO. This should include Heads of Terms of any S106 agreement, land acquisition orders, traffic regulation orders, sideroads orders, stopping up orders, temporary traffic orders, and public rights of way diversion orders.
 - e) Any community enhancement and / or mitigation of adverse impacts of the scheme including those that should be secured by way of a Community Benefit Fund or equivalent
2. The first consideration is how the proposals help deliver the Council's strategic objectives as set out in the WCS within the framework of the national policy set out in the NPPF and NPS. Secondly, consideration of the specific impacts that a scheme of this scale may have on the environment, transport and rights of way network need to be considered including if it is necessary and / or possible to mitigate them and if so by what means.

3. Consideration of Strategic Economic Objectives

Economic Considerations

3. The WCS is an economy-led strategy, which unequivocally places an emphasis on economic growth as the driving force behind meeting Wiltshire Council objectives of fostering stronger, more resilient communities. The underpinning idea of the strategy is to strengthen communities, wherever possible, by maintaining and increasing the supply of jobs to align with the delivery of new homes to ensure that Wiltshire remains strong and prosperous and addresses historic trends of out-commuting and non-affordability of homes.
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 suitable development objectives have been met...*"
6. The wider strategy of the WCS, 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 WCS vision for Amesbury states that the town will have good levels of employment, including the specialist sectors within the Ministry of Defence (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 allocated 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 this as leverage to attract synergistic inward investment is a key objective of the WCS. 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.
12. 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 to their customers. The scheme will also help

to link people with jobs and provide better access to higher value, local jobs which in turn will contribute towards reducing out-commuting from Wiltshire.

13. At a regional level, the South West region is home to one of the largest concentrations 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

14. 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 WCS.
15. The established Plan for job growth set out in the WCS via facilitating growth of existing employers and delivering an attractive investment environment for new inward investment is key to the work of Wiltshire Council. 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

16. 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 with the Areas of Outstanding Natural Beauty (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.
17. The Spatial Vision of the WCS states that by 2026, Wiltshire's heritage will have been a major driver used to promote tourism for economic benefit.
18. Strategic Objective 1: "Delivering a thriving economy" recognises that the potential for tourism should be realised as a major growth sector through capitalising on the quality of the environment and location Wiltshire benefits from. The WCS 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.
19. The WCS 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 Outstanding Universal Value (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. An opportunity to explore and understand the wider WHS, should increase the dwell time spent by a proportion of visitors, which in turn will boost overnight stays in the area thereby boosting the local economy.

20. 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

21. 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 then have positive impacts on the economy of the county, and therefore is in accordance with the economy-led policies set out in the WCS.

4. Environmental Considerations

22. Wiltshire’s 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 complexities 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 OUV.
23. The Spatial Vision of the WCS is 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 WHS will be protected from inappropriate development and controlled in a way which sustains its OUV. Therefore, 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.
24. The area strategy for the Amesbury community area as contained in the WCS, states that one of the specific issues to be addressed in this area relates to supporting the delivery of improvements to the A303 and that the council will continue to work with partners to ensure that any scheme does not compromise the WHS.
25. Core Policy 58 of the WCS 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.

26. Core Policy 59 of the WCS 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.
27. Core Policy 6 of the WCS 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:
 - a) Return Stonehenge to a more respectful setting befitting its WHS status,
 - b) Include measures to mitigate the negative impacts of the road.
28. 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.
29. The WCS 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 and 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.

The Environmental Assessment (EA)

30. The preliminary framework published by HE to inform the EA is the A303 Stonehenge, Amesbury to Berwick Down, Preliminary Environmental Information Report (PEIR), February 2018. Wiltshire Council considers this to be a robust framework for producing the necessary assessment. It accurately identifies the policy framework set out in local policy (WCS) and national policy (NPPF, NPS) and will provide the decision maker with an authentic and credible evidence base on which to base their assessment of whether the environmental benefits outweigh any negative impacts, when the latter are mitigated. The necessary decision on this planning balance can only be made by the competent decision maker on receipt of the output from the EIA process as set out in the EA, and Wiltshire Council requests that the policy priorities set out within this section be taken into account when that judgement is made.
31. The decision makers in this instance [as a Nationally Significant Infrastructure Project (NSIP), this scheme will be dealt with under the 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, historic environment, ecology, landscape and residents. Wiltshire Council considers that the framework set out in the PEIR, will provide this evidence in an effective manner.

Conclusion on Environmental Considerations

32. Section 104(3) Planning Act 2008 states that the Secretary of State (SoS) must decide the application in accordance with the relevant NPS, unless some exceptions apply, one of which is at s104(7) Planning Act 2008 – *“if the [SoS] is satisfied that the adverse impact of the proposed development would outweigh its benefits.”* As stated above Wiltshire Council

considers that that the PEIR, provides a robust framework for producing the necessary assessment. It accurately identifies the policy framework set out in local policy (WCS) and national policy (NPPF, NPS) and will provide the decision maker with an authentic and credible evidence base on which to base their assessment of whether the environmental benefits outweigh any negative impacts, when the latter are mitigated.

33. Reducing the negative impact of the A303 on Stonehenge is a clear objective of the WCS, 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 as the natural environment.
34. Full and detailed Environmental and Heritage Impact Assessments will need to form part of the further work to be undertaken by HE, 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 benefits that will accrue against the extent of any environmental harm that will occur and how this can or cannot be mitigated.

5. Highways and Transport Considerations

35. Wiltshire Council is the highway authority for all roads and public rights of way in the vicinity of the scheme which do not form part of the A303 trunk road. As the local highway authority, the Council will be responsible for the on-going maintenance of all new roads and public rights of way which are associated with the A303 Stonehenge Scheme, and in respect of those parts of the existing trunk road which are to be downgraded in terms of their current highway status (de-trunked and / or converted status).
36. Where the term 'right of way' is used in the description under the Local Roads section, the precise nature of the right of way intended can be found in the schedule included in the Public Rights of Way section which follows. The consultation document drawings often refer to 'new byway' as a generic term to cover different categories of rights of way.
37. Since the non-statutory consultation reported to Cabinet on 14th March 2017, many of the scheme proposals have been clarified, and a better understanding of the likely detailed arrangements affecting local roads and rights of way has been established.
38. In relation to local roads and rights of way, the following issues are raised as a response to the consultation.

Local Roads

(From West to East)

39. The scheme extent at its western end remains much as previously understood, at the time of the non-statutory consultation, with the dual carriageway connecting to the existing dual carriageway near Yarnbury Castle, Berwick Down. The western section of the existing road will be downgraded to a byway and a private means of access between the existing eastbound layby and the tie-in area.

40. Through the village of Winterbourne Stoke it is intended that the nature of the existing carriageway will be downgraded to reflect local needs only and to facilitate a dedicated track for cyclists. The details of the arrangements for the village section of the road remain to be determined, but it is envisaged that the speed limit will be reduced from 40mph to 30mph through the village and that some traffic calming might be incorporated into the existing road to help facilitate the management of speeds at or below the speed limit.
41. From the layby west of Winterbourne Stoke to a point east of the village where the route needs to be changed to accommodate access to the proposed grade separated Longbarrow junction, the existing A303 will be de-trunked (with maintenance responsibilities passing to Wiltshire Council) but generally be retained in its current form as a local adopted road. The remaining section to the existing Longbarrow junction will be stopped up, with land likely reverting to the frontage landowners.
42. To the east of Longbarrow, the nature of the existing A303 will be dealt with as previously intended i.e. de-trunked and downgraded to provide for non-motorised users only (but with exemptions, as necessary, to provide for private access to agricultural land). The status of the 'old' section of the road, where general traffic is to be removed is detailed in the Rights of Way section below. The existing road construction materials are intended to be excavated and disposed of, the new surface will be a more natural chalk based material, but suitable for its intended use by equestrians, leisure cyclists and pedestrians, as well as for vehicular access to fields, where required.
43. The old road will be downgraded to a right of way from Longbarrow to the junction with Stonehenge Road, to the east of Amesbury, where the right of way will divert onto the Stonehenge Road. Local roads through Amesbury will be used to connect non-mechanical users to existing routes to the east side of town.
44. To the east of the Stonehenge Road junction it is not intended that any public access be made available on the former line of the A303. The future use of this section has not been determined, but it is assumed that the old road will be stopped up and the land, which it is understood to have been acquired by the Department for Transport (DfT) when the dualled section west of Countess Roundabout was constructed, will likely revert to HE, who will determine its future use and ownership (subject to Crichel Down Rules potentially applying).
45. Arrangements for Wiltshire, as Local Highway Authority, to take on the responsibility for those parts of the A303 to be de-trunked will be dealt with through negotiation with HE; the essential requirement on the part of Wiltshire Council will be to ensure that it receives an asset in good repair, where the need for structural maintenance in the foreseeable future being minimised.
46. A requirement will be sought to secure a de-trunked asset which will not require foreseen structural maintenance interventions for at least 5 years following the asset being vested in Wiltshire Council.

B3083

47. The proposals include a bridge to carry the B3083 under that part of the A303 forming part of the proposed Winterbourne Stoke northern bypass. As a support structure for the A303, the bridge will be maintained at the expense of HE. The bridge structure will be built off-line to the west of the existing road, and the alignment will reflect more closely local standards than

DfT standards as set out in the Design Manual for Roads and Bridges. The departures from standards will be sought in order to minimise local landscape impacts. Highways officers consider that a standard of new route to reflect the general standards of the existing route are appropriate in the circumstances, and would thus support a departure from standards.

Longbarrow Junction

48. The proposals for the new junction are now clarified; the form of junction is intended to be of a 'dumb-bell' type layout, with small roundabouts on both the north and south side of the new A303 with a single bridge crossing. The arrangement will allow for all traffic movements between the A303 and A360. It is standard practise that the Local Highway Authority takes responsibility for such roundabouts, with trunk road responsibilities ending at the termination of the mainline slip roads.
49. It is not intended at this stage that the junction be lit with conventional street lighting. It is normal for roundabouts to be lit, but unlike DfT standards for Wales and Scotland, lighting of roundabouts in England is not a mandatory design requirement. Wiltshire Council, as the highway authority taking responsibility for this junction, will need to be fully satisfied that safety has been given precedence over other considerations which might seek not to provide street lighting at this junction. Compromises to standard lighting provision will be considered, and will need to be agreed. HE will undertake a risk assessment before finalising the scheme proposals in relation to lighting at the junction.
50. If street lighting is deemed to be unnecessary on safety grounds, then the Council will need to protect its future interests in the roundabouts at the junction through an undertaking from HE to undertake a Stage 4 (Monitoring) Road Safety Audit at least 12 months following the completion of the scheme. A Stage 4 Road Safety Audit will help provide evidence of the need for lighting, or not, as the case may be.

A360

51. The new Longbarrow junction, being off-set to the west of the existing A360 will have new north and south side linking roads; consequently, there will be a redundant length of the existing A360 which will not be required to general traffic. It is proposed that to the south of the new A303 the redundant carriageway will be used as a right of way (subject to clarification – see paragraph 111 below)
52. To the north of the new A303 the redundant A360 carriageway will be used to provide for a pedestrian and cycle link which will extend, alongside the existing A360 (to be north of the tie-in point of the new junction connecting road), to the Visitor Centre. The route alongside the A360 may be wholly or partly within the WHS.

Old Stonehenge Road

53. The Stonehenge Road, close to its existing junction with the A303 will be closed to through traffic, although the road (and part of the 'old' A303 route) will be used to provide access via a private access road to serve e.g. the Stonehenge Cottages. A turning facility must be provided where its public use by vehicular traffic terminates. The closed part of the road will be retained as a right of way.

54. An issue of concern has been identified in relation to two farms (Park Farm and West Amesbury Farm), because the farms have a need to accommodate movements of large vehicles (combine harvesters, circa 4m wide), which could be problematic if the only access to the farms were to be via Amesbury. It is understood that matters relating to this issue are recognised by HE and attempts will be made to ensure that suitable and appropriate access arrangements are established. The solution to the problem might involve some minor changes to waiting restrictions within Church Street, to help remove local pinch points, which can be caused by on-street parking.

Countess Road (North and South) – A345

55. The existing roundabout will become grade separated, with the A303 mainline flying over the junction. Around the periphery of the junction it is intended to provide a cycle track, with signal controlled crossing at the slip road entry and exit arms. The full junction signalisation will likely be retained (full time, similar to existing) for safety reasons associated with the cycle track / slip road crossing points (although full signalisation will not be required for capacity reasons at the junction). The existing signals are on the trunk road and therefore the responsibility of HE. The responsibility for future maintenance of the proposed signals will likely pass to Wiltshire Council, for which a maintenance contribution will be sought.
56. The existing pedestrian underpass to the east side of the junction will be abandoned and filled; the siting of the existing underpass coincides with the required bridge foundations, and so it could not be retained for any purpose.
57. To the north and south of the junction there will be minimal changes to the A345, because the junction will essentially retain its existing layout at ground level.
58. Slip roads between A303 and A345 will generally be two-lane in width, but the eastbound on-slip will be a single lane with a facility retained for access to the Countess Services.
59. A contribution will be sought by the Council towards the future energy and maintenance costs associated with any traffic signals to be provided on the Countess Roundabout (for those costs which might fall to the responsibility of Wiltshire Council).

Amesbury Road

60. The Amesbury Road, to the north side of the A303, currently provides for two-way movement at the junction. In accordance with ambitions to make the A303 an Expressway, the eastbound entry from Amesbury Road to the A303 is intended to be removed, as its junction with the A303 is a substandard layout. It is proposed that Amesbury Road becomes a one-way road, in a north-easterly direction, with no entry southwards from its junction with Double Hedges. It is envisaged that existing agricultural access gates will be replaced with new access arrangement direct from Double Hedges. Appropriate signage will alert drivers to the change in circumstances.
61. To the south side of the A303, Amesbury Road will be kept as a public right of way, but downgraded from byway to bridleway.

Double Hedges (A3028)

62. Double Hedges currently provides for only an eastbound connection to the A303; left turns from the A303 are prohibited. This arrangement is proposed to be retained with only minor local junction changes.
63. Accordingly, Amesbury Road and Double Hedges together will provide for access between the eastbound carriageway of the A303 and Bulford Camp. Westbound traffic from the camp to the A303 would need to use roads connecting with Solstice junction, or junctions further to the west.

Allington Track

64. The existing junction of Allington Track with the A303 is materially substandard, and has to be closed for safety reasons and to facilitate future Expressway status. The road itself will be retained but downgraded north of the new connector road referred to below, to a bridleway. A new link between Allington Track and Amesbury Road and onwards to an extension of the adopted part of Equinox Drive is proposed alongside the southern boundary of the field adjoining the southern boundary of the A303. It is proposed that this will be provided as an all-purpose highway, having a carriageway width of 5.5m, and narrow verges. This would be consistent with or above the standard of the existing road through to Allington. It will be necessary for land to be acquired by HE to achieve this road link, and its successful delivery will ensure that current users are provided with a far safer access / egress movement at the A303, via the Solstice junction slip roads.
65. However, it is known that the track is currently used by QinetiQ at Boscombe Down for bringing large loads into the site (mostly at night, when flows on the A303 are minimal). This requirement (the need to accept large loads) can be anticipated to continue, and the potential increased use of the track should accommodate passing traffic over and above the standard 2.5m Construction and Use Regulations maximum width. At the least, the new road should be provided with widened passing places to help ensure that verge over-run is avoided.
66. A requirement will be sought to secure appropriate provision for large load vehicles to pass general traffic on the line of the alternative Allington Track connection to A303.

Local Diversion Routes and High Load Routes

67. On occasions, it will be necessary for the tunnelled section of the A303 to be closed to traffic, either for one or both directions. It is considered that closure will be an uncommon event, because planned maintenance works within either bore will be undertaken, where possible, at quieter periods, and two-way working will be introduced in the bore not subject to works.
68. On those occasions where an incident requires unplanned closure of one or both bores, diverted traffic will be directed via the A360, B3086, The Packway and A345 Countess Road North. This is an existing diversion route used when the A303 past Stonehenge is closed. A similar route will be used for the diversion of high loads (those over 6.1m high) which can't pass through the tunnel, although in this case the route will use the A3028 / Salisbury Road (avoiding the A303 flyover bridge at Countess Roundabout).
69. A condition will be sought to secure a scheme for the management of diverted traffic when access through the tunnel is partially or wholly unavailable. The scheme shall set out

arrangements for the signing of the alternative route and the management of traffic at the local, regional and national level to ensure that motorists are least inconvenienced by planned and unplanned closures, and that local diversion route traffic loads are minimised. The reduction in current 'rat-running' through Bulford and Larkhill as a result of the scheme is likely to more than compensate for the occasional need for the diversion route roads to accommodate diverted traffic.

Rollestone Crossroads

70. HE have acknowledged the deficiencies of the Rollestone Crossroads to sensibly accommodate the emerging traffic patterns in the area resulting from use of The Packway as a formal diversion route in the event of unplanned maintenance or incidents requiring closure of one or both tunnels, together with increasing local development needs.
71. A design has emerged for a slow bend to replace the crossroads layout, with two side road junctions to serve the 'Bustard' road arm and the Shrewton arm. Such a layout provides priority to the Rollestone Road / Packway route, and should help to discourage use of the Shrewton arm as a link between The Packway and the A360 (W). As a consequence, consideration should be given to Rollestone Road and The Packway (Airman's roundabout through to Stonehenge Inn roundabout) being numbered as the B3086 route, rather than the current route, along London Road and onwards through Shrewton to the A360.
72. The re-alignment of roads at the junction will reflect more closely local standards than DfT standards as set out in the Design Manual for Roads and Bridges design standards. The necessary departures from standards will be sought by HE in order to minimise local landscape impacts, as the site is both adjacent to the WHS boundary, and close to MoD operational land. Highways officers believe that new junction proposals reflecting the general turning movements and priorities sought on the existing route are appropriate in the circumstances, and that trunk road standards for bends would represent an over-design in or adjacent to this part of the WHS.
73. There will be a requirement to ensure that an acceptably designed scheme for the realignment of the Rollestone Crossroads junction is secured and implemented in accordance with a programme of works to be agreed.

Use of Local Routes as Haul Routes

74. It is anticipated that circa 1 million m³ of material may arise from earthworks associated with the tunnel scheme. It is proposed that all suitable material will be deposited on site (particularly to the east of Parsonage Down) as land-raise; cut material will generally be used for embankment fill for roadworks. Only unsuitable (contaminated) material will be removed from the site. The extent of the site, as shown by the red line boundary, includes all areas where fill material might be used. The majority of tunnel arisings will be used to raise ground levels at the western end of the site. Accordingly, the tunnel progress will proceed from west to east for the first tunnel, with the Tunnel Boring Machine (TBM) being turned to bore the second tunnel westwards. The first tunnel, and cross connecting tunnels will be used to move arisings towards the western portal. From there, it is anticipated that suitable usable material will be hauled via site roads principally within the line of the new road to the tipping point, with crossing points on the A36 and A303 only. Accordingly, any preconceived concerns about potential road damage and disruption caused to local communities should be substantially quelled.

75. Because of the size of the scheme, there will also be considerable numbers of heavy goods vehicle movements delivering materials to the site. At this time, there is no information about the source of construction materials (which include coarse and fine aggregates, bitumen, cement etc.), but the likelihood is that it will come from many directions. Wiltshire Council should endeavour to ensure that, as far as is reasonably practicable, HE requires through contracts that road construction materials be delivered by way of the motorway and trunk road network, and that deliveries avoid using local county roads in the vicinity, many of which may be inappropriate for the nature of potential demand.
76. It is proposed that primary tunnel linings be fabricated on-site, at a compound west off the A360 near Longbarrow, where a batching plant will be set up, and that bitumen-bound road construction materials be mixed on-site too.
77. A requirement will be sought to ensure that the management of haul routes to and from the site, for inbound road and tunnel-making materials and outbound waste respectively maximises use of the trunk road network and minimises use of the local road network.

Construction Compounds

78. It is intended that the main compound area be sited to the west of the A360 near Longbarrow, with satellite sites at Countess and close to the River Till viaduct. No details are yet available as to how such compounds might be accessed, but the Countess site will likely lie behind Countess Services. The River Till viaduct satellite compound may require access from the B3083; this road is inappropriate as a construction site access from the north (Shrewton), and will likely need to be reinforced at its southern end if used as a haul route from the A303. Wiltshire Council will need to ensure that HE remediate any damage to local roads at no cost to the local tax payer. A pre-commencement condition survey of local roads potentially subject to construction traffic use will be a requirement of the Council in relation to any DCO consent. The Council will encourage as much construction traffic movement as possible to be contained within the operational construction site boundaries.
79. A requirement will be required to ensure that appropriate pre-commencement and post works visual and / or structural carriageway surveys are undertaken to ensure that any contract works road damage can be identified and rectified at no cost to Wiltshire Council.

Traffic Impacts

80. As previously identified, provisional traffic modelling outputs demonstrate that the scheme will provide the solution to the known problem of A303 traffic diverting, particularly at busier times, onto local routes. The principal diversion routes are predominantly used by westbound traffic, using routes either to the north or south of the A303. Traffic, by varying degree, uses the Solstice junction to access Salisbury Road to Bulford then westwards, or Countess Road North to Durrington, and onwards via The Packway, or through Amesbury to Stonehenge Road. Packway traffic returns to the A303 or A360 via the B3086, either via Airman's roundabout, or via Shrewton and Chitterne. All the diversion routes (or 'rat-runs' as they are often referred to) will experience a reduction in traffic flows, notably in the summer period when the rat-running is most severe. The traffic impacts are set out in the appendices and figures of the PEIR and the Preliminary Local Traffic Information document, both of which are included within the consultation package. Further work is being undertaken by HE to refine

the forecast traffic flows at the very local level. A resume of the information supplied is set out below.

81. The [PEIR](#) states:

5.8.16 The A36 towards Warminster is expected to experience increases in traffic flow this may cause a reduction in air quality, albeit not to concentrations above air quality objectives. Other routes expected to experience an increase in flows which may cause a reduction in air quality, albeit not to concentrations above air quality objectives, include:

- a) A36 towards Warminster;
- b) A360;
- c) Minor routes through Stockton and adjacent villages; and
- d) B3083 through Berwick St James and into Shrewton.

5.8.18 Traffic flows are expected to reduce, and therefore air quality improvements are expected, along the following routes:

- a) A338 towards Salisbury;
- b) A3028 towards Salisbury;
- c) Packway, the Rollestone Corner and Chitterne Road (B390); and
- d) Minor roads south of the A303, between the A360 and the A345.

82. Figure 1 of the consultation document '[Preliminary Local Traffic Information](#)' shows how Annual Average Daily Traffic (AADT) will increase or decrease on various roads in the vicinity of the scheme. It shows that the changes in traffic flows will not be altered through Berwick St James, and reducing by 1000 vehicles per day (vpd) on the A36 south of Deptford. Some clarification may be required to address apparent inconsistencies in the consultation document. HE stress that the figures presented in the consultation documents are preliminary and that further work is being undertaken, particularly in relation to refining the traffic model for the local roads, and that the apparent inconsistencies will be addressed. It is a concern that traffic is forecast to increase through Stockton and adjacent villages (the C10).

83. The routes currently most affected by traffic avoiding the Stonehenge area congestion will have reduced levels of daily traffic; the figures below represent the initial forecasts made by HE and all figures are rounded to nearest 100, and relate to the difference between with and without scheme scenarios:

Telegraph Hill (Salisbury Road)	1100
The Packway, Larkhill	3500
London Road, Shrewton	2500
B390 Chitterne	2900
Stonehenge Road	1800
London Road, Amesbury	200
A3028 east of Bulford	400

84. The reduction of flows in Stonehenge Road will reflect reductions on other local routes, including Salisbury Street. However, Durnford traffic wishing to travel westbound on the A303 might choose to use High Street, resulting in extra flows on High Street. The forecast reduction of 200 vpd on London Road will have a compensating effect for the signals controls at the end of High Street. Nevertheless, signals timings may need to be reviewed and adjusted as part of the scheme, following scheme opening.

85. The flows on Countess Road North are forecast not to vary significantly from existing flows.
86. There is currently no detailed explanation as to the forecast that the A345 will see up to 1200 vpd south of the A303, whilst reduction of 200 are forecast on Stockport Avenue and London Road, 1800 on Stonehenge Road and 2300 on A345 south of Stock Bottom. It is anticipated that these figures will be further explained once the local area detailed modelling has been undertaken and verified.
87. On the A303 itself, 2026 flows are forecast to increase by 11400 vpd to the west of Winterbourne Stoke, and 10700 to the east of Solstice Park. This suggests that future acute problems might be anticipated at the remaining Wiltshire single carriageway sections between Cricklade Bottom and Mere and Wylve to Stockton Wood, where the dual carriageways merge to single lane working.
88. In summary, the traffic figures presented for the consultation will need to be carefully reviewed to minimise any inconsistent views going forward to the DCO Examination.

Use of Byways 11 and 12

89. It is a matter of conjecture as to whether the current issues arising from use of (particularly) Byway 12, namely use by traffic to view the Stones and / or to camp illegally at the side of the byway, will be exacerbated or ameliorated as a result of the loss of the A303 at surface level past the Stones. If the former, then the Council would potentially have to take action at a later date to address issues if unacceptable consequences were to arise. Consequences might include increased traffic use of the wider byway lengths e.g. extra traffic using the A360 junction at Druids Lodge, or accessing from the north via Larkhill MoD roads, byway surface deterioration, illegal camping etc. A new link between Byways 11 and 12 is shown on the proposal's drawings; this matter is further addressed in the Public Rights of Way section of this report.
90. The Stonehenge Management Plan seeks to manage traffic within the WHS. Policy 6b of the Management Plan states: *Manage vehicular access to byways within the World Heritage Site to avoid damage to archaeology, improve safety and encourage exploration of the landscape on foot whilst maintaining access for emergency, operational and farm vehicles and landowners.*
91. It is understood that the partners to the Plan, other than the Council, would wish to see the traffic currently permitted to use the byways to be prohibited to the maximum extent practicable (i.e. a Prohibition of Driving Order). The Council has previously (2011) promoted such an Order, but this was not supported by the Inquiry Inspector. Circumstances may have changed significantly as a result of the proposed tunnelling scheme.
92. There are conflicting duties on the Council in relation to the consultation proposals; on the one hand, it has a duty to assert highway rights, and on the other it has a duty to protect archaeological interests. As noted below, the provision of a new link between the byways, to the south of the existing A303 line is objected to by the Council's Archaeological Service.
93. There are a number of options which have been considered by highways officers in the context of how Byways 11 and 12 should be addressed:

94. Option 1: To support the provision of a new link between Byways 11 and 12 as shown on the consultation proposal plans, and maintain vehicular use on the byways.
95. This option would be in conflict with the Council's archaeological interests in relation to the construction of the new link and in conflict with the objectives of the Management Plan. Furthermore, it is understood that Management Plan partners are all opposed to the provision of a new link between Byways 11 and 12 in the location proposed.
96. Option 2: To support a vehicular link between the byways on the line of the existing A303.
97. This option could be in conflict with the Management Plan, but would avoid the archaeological objections to the proposed alternative link and align with the Council's highways duties. It could perpetuate issues requiring intervention by the Council for example (i) the need to maintain the byways in a safe manner to accommodate non-agricultural traffic (e.g. cars, camper vans) (ii) the costs of interventions to address existing illegal camping on the highway, and its duty to prevent unlawful encroachment on any roadside waste comprised in a highway (iii) dealing with rubbish left by users, etc.
98. Option 3: To acknowledge the conflicts of interest associated and the likely objections to the retention of vehicular rights on linked Byways 11 and 12; for the Council to agree not to oppose the promotion of a Prohibition of Driving Order by HE through the statutory processes; and to make available such evidence that may be available to the Council in relation to supportive reasons for such an Order.
99. Option 3 would be in line with the Management Plan objectives (to manage traffic on the byways within the WHS), but the Council, having a duty to assert rights on its highways, would be cautious, given the outcomes of inquiries in 2005 and 2011, as to the promotion of such an approach.
100. Option 3 would also help inform the DCO Inspectors on an issue about which it is anticipated there may not be agreement between the various consultees.
101. It is recommended that Option 3 be pursued, so that HE can proceed to incorporate in their submitted design proposal a connection between Byways 11 and 12 along the line of the old A303, but without the level and nature of traffic use to which the partners to the Management Plan object.

Local Roads Issues to be Resolved

102. The statutory consultation appears to provide a clearer indication of the physical proposals and generally the transport consequences thereof. In general terms, the scheme proposals will result in the transport outcomes anticipated, namely (i) the removal of congestion on this part of the A303 corridor, (ii) a more reliable journey time for users of the road in the area, (iii) the avoidance of the proclivity for drivers to rat run on the grounds of actual or anticipated time savings compared with staying on the A303 and (iv) a consequential reduction of traffic on those routes currently used as rat runs. These impacts are all seen as positive.
103. In relation to those occasions where tunnel bores have to be closed for unplanned works, there will likely be potentially severe local impacts with traffic using the signed as well as unsigned alternative routes; this is considered to be unavoidable. However, with an

appropriate management plan in place, as referred to above, it is considered that the potential problems can be appropriately mitigated.

104. However, as in the case of many road improvement schemes, the improvement itself can result in increases in traffic on local connecting roads resulting from the attractiveness of the new road compared with its unimproved state. The A360 from Salisbury area, and the A345 Countess Road South to the A303 count amongst those routes which are anticipated to see additional traffic use. HE has confirmed that further refinement of traffic forecasting through the consultation period and beyond will allow for a more definitive view to be reached on this aspect of the scheme proposals prior to any submissions being made to the DCO Examination.
105. It is unlikely that additional traffic on the A360 will cause problems in the busiest periods, particularly given the constraints in peak period growth on e.g. the A36 in Salisbury, which suggests that additional traffic will likely be off-peak in the vicinity of the city. Outside the city area, there is not an existing capacity issue with the A360 between Salisbury and A303. Forecast traffic increases on the A345 north of Stock Bottom need to be further examined to determine the consequences for the route through Amesbury town area.
106. For the B3083, the route standard is poorer than the A360, and the impacts on the communities of Stapleford and Berwick St James will be more acute if additional traffic uses the route; current forecast suggest this will not be the case. It will be necessary for officers to ascertain the details of any such impacts, and to make representations accordingly.

Local Roads Traffic Regulation Orders (TROs)

107. Whilst the consultation does not address any need for traffic regulation associated with the scheme, it is inevitable that, as design proceeds, the detailed requirements for regulation will become clearer. For example, it is anticipated that there might be a need for regulation to address the changes anticipated through Winterbourne Stoke. When the impacts of the detailed proposals become clearer, it is anticipated that all regulatory requirements will be identified and addressed by HE in consultation with the Council. The Council will seek a requirement from HE at the DCO Examination to address all necessary TROs arising on local roads as a result of the works. Such a requirement may include potential speed, weight and waiting restrictions, as well as any orders to regulate traffic calming in Winterbourne Stoke and potential Cycle Track Act orders to regularise use of paths by cyclists.
108. A requirement will be sought to ensure that all traffic regulation orders relevant to this scheme are addressed within the DCO process and that the Council is compensated for any costs that it may incur in respect of any traffic regulation orders for which the Council might be responsible arising as an indirect consequence of the A303 Stonehenge Scheme.

6. Public Rights of Way (PROW) Considerations

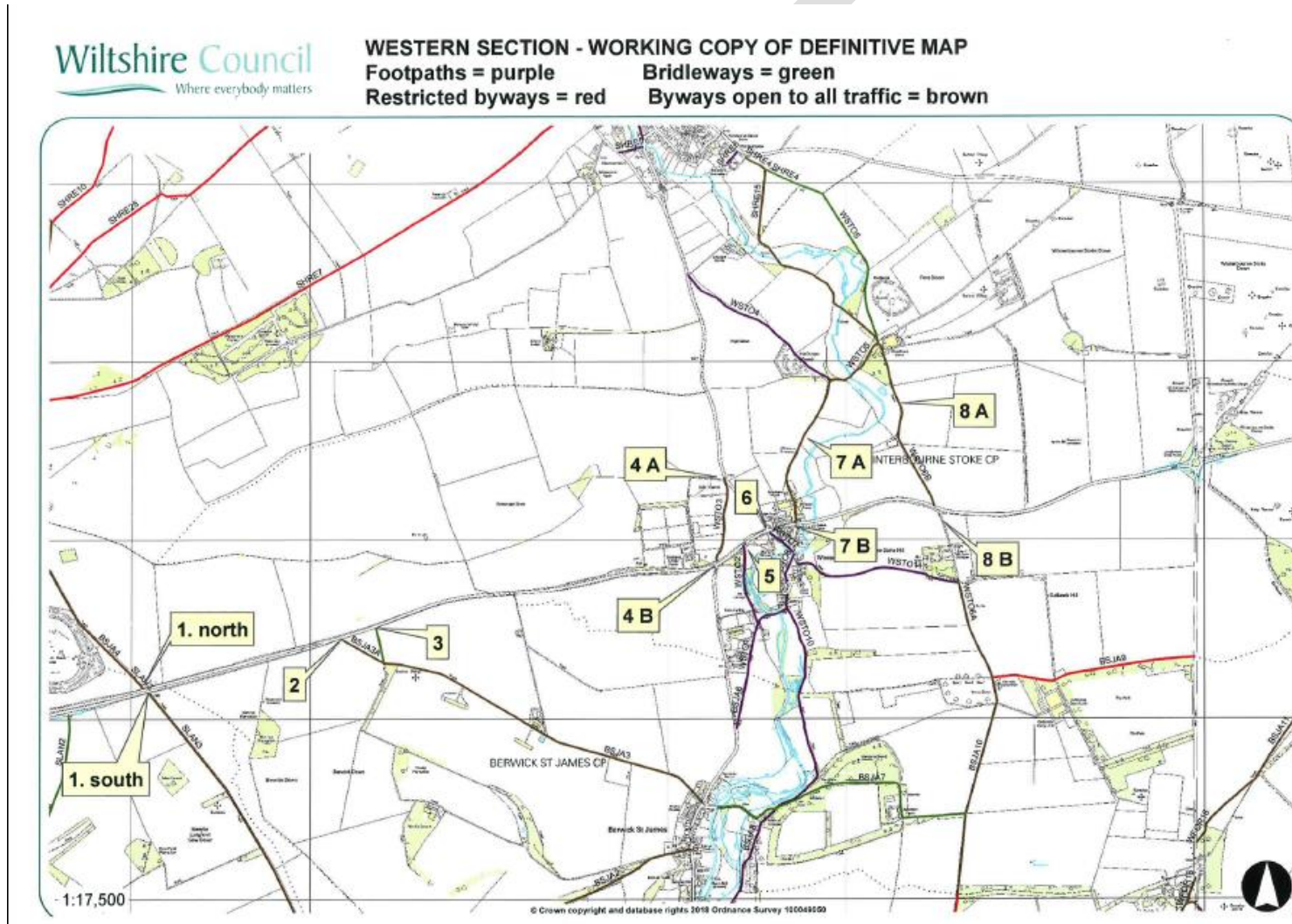
109. In general, the proposed solutions for the amendment of the public rights of way affected by the scheme are pragmatic and are therefore welcomed. However, in what is understood to have been an attempt to simplify the key to the maps, there has been a wide use of the word “byway” to encompass rights of way of differing status, which has already resulted in the Council’s Rights of Way officers receiving requests for clarification from confused members of the public and representatives of rights of way user groups.

110. Additionally, the plans show a number of paths and tracks that are not recorded as public rights of way and are not known to have any legal status as such; some of these routes are available for use by the public as permissive paths or as part of a wider landscape to which there is general public access, but as far as Rights of Way officers of the Council are aware there is no intention on the part of landowners for them to be designated as public rights of way.
111. It is unfortunate and regrettable that this initial response must, therefore, be prefaced with the statement that the consultation in this respect is at best confusing and at worst misleading, so clarification of the real intentions is going to be needed at the earliest possible opportunity by using the correct terms of public footpath (FP), public bridleway (BW), restricted byway (RB), byway open to all traffic (BOAT), cycletrack (with or without pedestrian and equestrian rights) and permissive paths.
112. Taking the west to east approach as used in the local roads response above, observations are made within the tables below:

DRAFT

Plan 1 – Western Section – Winterbourne Stoke Bypass to Longbarrow Roundabout

An extract of the Working Copy of the Definitive Map of Public Rights of Way to match the Western Section is contained below for information. Please note that this displays the existing PROW network and not the changes which HE propose as a result of the scheme.



No. on Plan	PROW Number	Recorded Status	Interaction with Proposal	HE Proposal	Wiltshire Council Comments
1	SLAN 3	BOAT	Crosses A303	MPVs to use existing crossing. Status of new routes to be created on north and south of A303, linking to Green Bridge No. 1 and shown as “byway” is unclear	New routes need to be created as minimum of RB, but if created as BOAT then A303 crossing could be closed? Also see BSJA 3A and BSJA 3
2	BSJA 3A	BOAT	Meets A303	Missing from consultation plans	Needs to be stopped-up and BSJA 3 retained as BOAT. Unless direct access is to be retained from BSJA 3 onto A303, new route on south side of A303 needs to be BOAT to link to SLAN 3
3	BSJA 3	BW and BOAT	Meets A303	Appears to meet “Byway with private means of access” to Green Bridge No. 1 (Fig 5.4)	Needs to be BOAT to prevent cul-de-sac. If no direct access to be retained onto A303, new route on south side of A303 needs to be BOAT, to both west and east
4	WSTO 3	BOAT	Meets old A303	Proposed re-alignment of B3083 will affect northern end of WSTO 3	Small diversion proposed at northern end to meet re-alignment of B3083
5	WSTO 2	FP	Meets old A303	Old A303 to be downgraded to local road	No change
6	WSTO 7	FP	Meets old A303	Old A303 to be downgraded to local road	No change
7a	WSTO 5	BOAT	Crosses new A303	No mention – to pass under the River Till viaduct	Ensure sufficient headroom available
7b	WSTO 5	BOAT	Meets old A303	Old A303 to be downgraded to local road	Creates cul-de-sac BOAT
8a	WSTO 6B	BOAT	Meets new A303	Green Bridge No. 2 to carry “byway” across new A303	Preserve as BOAT
8b	WSTO 6B	BOAT	Over new A303 (Green Bridge No. 2) Meets old A303	Old A303 to be downgraded to local road	

Plan 2 – Central Section – Including World Heritage Site

An extract of the Working Copy of the Definitive Map of Public Rights of Way to match the Central Section is contained below for information. Please note that this displays the existing PROW network and not the changes which HE propose as a result of the scheme.

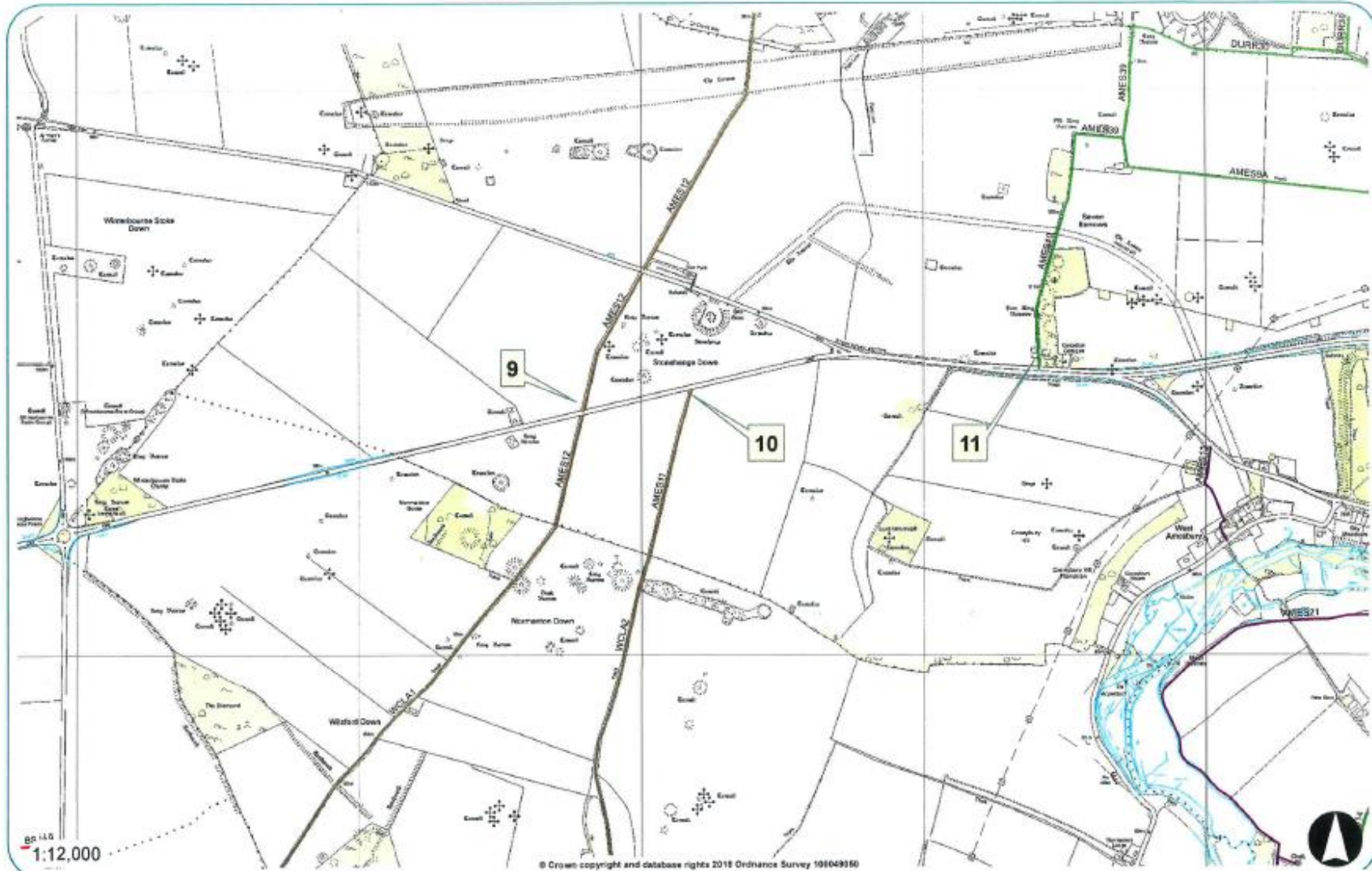
CENTRAL SECTION - WORKING COPY OF DEFINITIVE MAP

Footpaths = purple

Bridleways = green

Restricted byways = red

Byways open to all traffic = brown



No. on Plan	PROW Number	Recorded Status	Interaction with Proposal	HE Proposal	Wiltshire Council Comments
9	AMES 12	BOAT	Crosses old A303	Old A303 vehicle rights to be extinguished but consultation states that Byway 12 will continue to lead north over the road. HE supports removal of MPV rights on 11 and 12. Retention of old A303 as private vehicular access between Longbarrow Roundabout and Old Stonehenge Road also proposed as "byway"	Highway Authority has Highways Act 1980 S.130 duty to prevent, as far as possible, the stopping-up of the highway. MPV rights (if retained) on BOAT would need to be preserved over the crossing point of old A303. Status of public rights to be retained on old A303 between Longbarrow Roundabout and Old Stonehenge Road should be RB
10	AMES 11	BOAT	Meets old A303	Old A303 vehicle rights to be extinguished. Byway to be diverted to join 12. HE supports removal of MPV rights on 11 and 12	Creates cul-de-sac BOAT. Highway Authority has Highways Act 1980 S.130 duty to prevent, as far as possible, the stopping-up of the highway. Diversion suggested is reasonable as access is possible north on BOAT 12, but proposed diversion route is known to not be supported by National Trust and Historic England, so an alternative solution is required (see recommendation made in paragraphs 89-101 above). If the balance of interests is such that Prohibition of Driving Orders are made to exclude mechanically propelled vehicles from BOATs 11 and 12, no new link between the two needs be created as all non mpv users will be able to use the on-surface track of the current A303 as long as that track is created as a RB.
11	AMES 10	BW	Meets old A303	Old A303 vehicle rights to be extinguished. Private vehicle access to Custodian Cottages to be retained	Will make good link to former A303 route

Plan 3 – Eastern Section – Countess Junction to Solstice Park Junction

An extract of the Working Copy of the Definitive Map of Public Rights of Way to match the Eastern Section is contained below for information. Please note that this displays the existing PROW network and not the changes which HE propose as a result of the scheme.

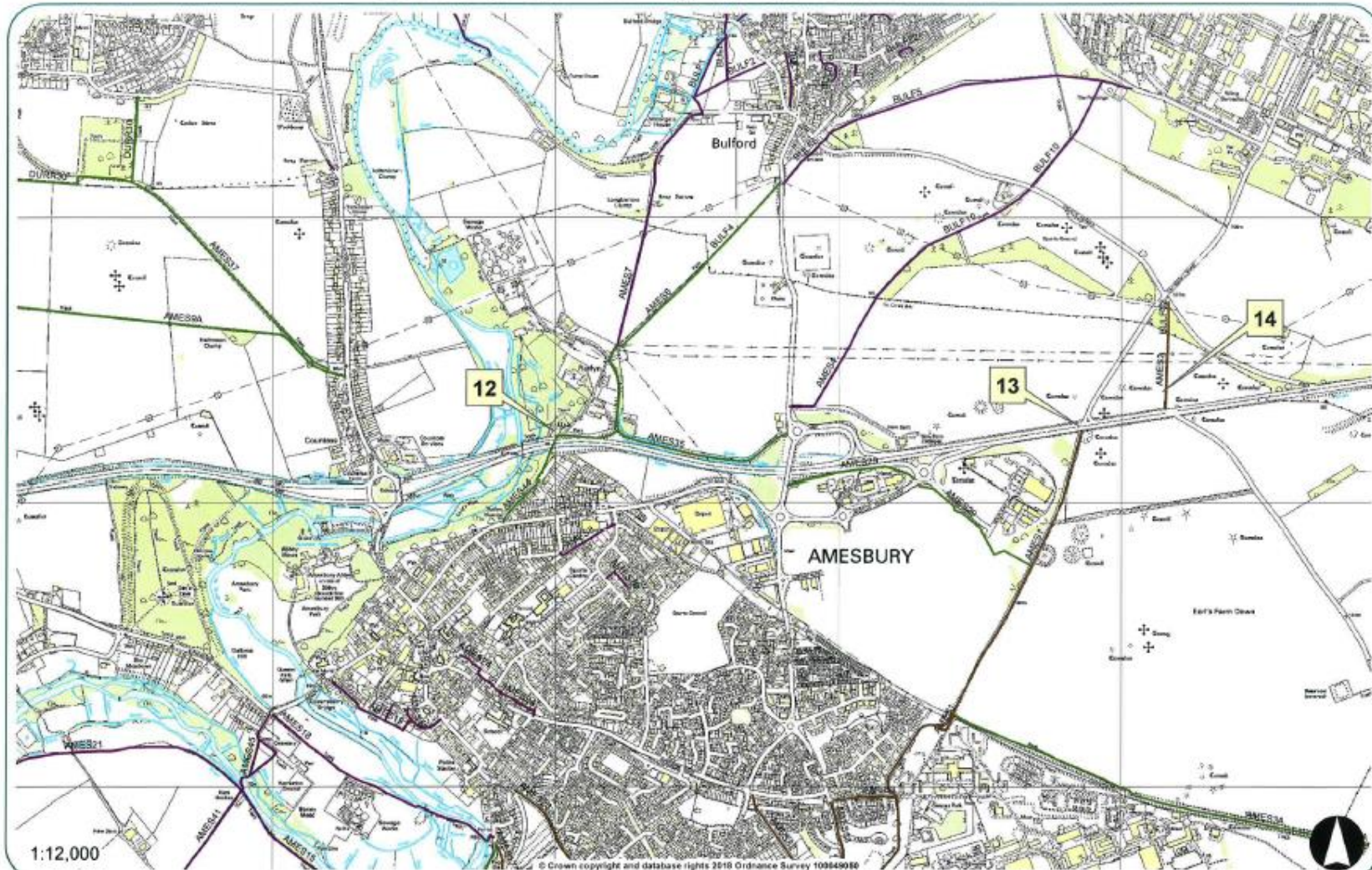
EASTERN SECTION - WORKING COPY OF DEFINITIVE MAP

Footpaths = purple

Bridleways = green

Restricted byways = red

Byways open to all traffic = brown



No. on Plan	PROW Number	Recorded Status	Interaction with Proposal	HE Proposal	Wiltshire Council Comments
12	AMES 44	BW	Cross A303 over bridge	Not mentioned	Bridge to be retained to maintain access
13	AMES 1	BOAT	Meets A303 south of A303	AMES 1 to be stopped up and connection A303 closed. New link between Allington Track and Amesbury Road created south of A303. AMES BW 29 is incorrectly shown as "byway"	Adequate provision to south. Look at alternatives for going north of A303
14	AMES 2	BOAT	Meets A303 north of A303	AMES 2 to be stopped up and connection to A303 closed	No provision north. No connection south of A303

7. Public Health and Public Protection Considerations

113. Wiltshire Council is the responsible authority for the implementation of a broad range of Government Regulation related to public protection. Law such as Environmental Protection Act, 1990 and the Environment Act, 1995 means Wiltshire Council must consider a number of factors in determining whether the location of a development is appropriate. We must have regard to a wide range of issues such as:

- Noise and vibration
- Air quality
- Contaminated land
- Lighting
- Odour

114. We therefore welcome the opportunity of contributing to this process and have produced the following response to help prevent or mitigate potential impacts on the development and on the other land uses near to it. We aim to ensure that people live and work in safe and healthy environments.

Noise and Vibration

115. The NPS (paras 5.186 and 7) recognises that noise and vibration from national network infrastructure can have a negative impact on both human life and health and on wildlife and biodiversity, and refers to the national Noise Policy Statement for England.

116. Potential impacts include:

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

Considerations

117. Construction methodology and plant requirements have not yet been confirmed and these will have a significant impact on noise generation during the construction phase.

118. It is recognised that the PEIR contains only a qualitative assessment of construction noise and vibration assessment based on the application of best practicable means to minimise noise and vibration levels.

119. It should be noted that noise monitoring to produce a baseline noise survey at a selection of locations along the proposed scheme is being carried out in early 2018, therefore the detailed information on existing background noise levels is not yet available to determine the impact of noise in both the construction and operational phases of the project. However, a detailed Construction Environmental Management Plan (CEMP) is required to address noise and vibration issues related to the construction phase. This plan is needed to ensure industry best practice is followed to mitigate negative noise impacts.

Recommended Requirements on Noise and Vibration

120. Construction Phase:

- a) A qualitative assessment of noise and vibration impacts arising from construction works must be undertaken and included in the ES that will be submitted with the DCO application.
- b) A requirement that a CEMP is to be submitted to and agreed by the Local Authority prior to the commencement of the construction phase to identify measures to mitigate noise and vibration from the construction phase of the scheme, including the siting, construction and operation of construction compounds and satellite offices, and use of low noise / low vibration methods. Specific emphasis is to be made to mitigating noise from construction of the elevated sections of the road at Countess Roundabout and over the River Till north of Winterbourne Stoke, and vibration at Stonehenge Cottages from the tunnel boring operations.
- c) Requirement to meet prior consent process under Section 61 of the Control of Pollution Act 1974 in respect to the construction phase of the scheme.

121. Operational Phase:

- d) Details of noise associated with the operation of plant serving the tunnel are to be agreed with the Local Authority prior to its commissioning.
- e) Tyre generated road noise shall be minimised from the scheme to protect the local amenity.
- f) Road noise exposure shall be minimised for receptors from the viaduct over the River Till north of Winterbourne Stoke, and from the flyover at the Countess roundabout to protect the local amenity.

Air Quality

122. The NPS (para 5.3 and 5.4) recognises the potential for increases in vehicle emissions from both the construction and operational phases of projects on the national networks, and that the effect of national schemes can extend well beyond the DCO boundary. Current UK and EU legislation set out health based ambient air quality objectives which need to be complied with by the proposed scheme.

Potential Impacts

123. Potential impacts include:

- Impact from both the construction phase particularly during the summer months (soil stripping, spoil disposal, creations of cuttings and bunds)
- Long-term traffic related pollution at relevant exposures (residential properties)
- Wider potential impacts on existing Air Quality Management Areas (AQMAS) in Salisbury

Considerations

124. There could be adverse effects during the construction phase of the proposed scheme in relation to construction dust and non-road mobile machinery (NRMM) and vehicle emissions. These could be suitably minimised by the application of industry standard mitigation measures.
125. At this stage in the proposed scheme details in relation to construction vehicles, the construction schedule, associated activities and detailed plant equipment are not yet available, therefore only a qualitative discussion of potential construction air quality impacts associated with these sources is provided in the PEIR.
126. Air quality from the operational phase of the road scheme has been assessed as having a low impact.

Recommended Requirements on Air Quality

127. Construction Phase
- a) No materials shall be burnt on the development site during the construction phase of the scheme.
 - b) A CEMP is to be submitted to and agreed by the Local Authority prior to the commencement of the construction phase to identify measures to mitigate dust generated during the construction of the scheme.
 - c) Traffic diversions should not involve routing traffic through AQMAs.
128. Operational Phase
- d) To examine the legacy impact of the development on Air Quality on A36 and A350 AQMAs and implement mitigation measures where a negative impact on Air Quality is predicted at relevant receptors.

Light Nuisance

129. The NPS (para 5.81) recognises that artificial light from both the construction and operational phases can cause negative local impacts.

Potential Impacts

130. Potential impacts include:
- Impact of artificial lighting (for working and security) during the construction phase
 - Lighting associated with the Countess Roundabout flyover

Recommended Requirements on Light Nuisance

131. These include:

- a) A CEMP is to be submitted to and agreed by the Local Authority prior to the commencement of the construction phase to identify measures to mitigate light nuisance from artificial lighting used as part of the construction phase.
- b) All artificial lighting shall be so sited as not to cause light intrusion or nuisance to residential dwellings in the area adjacent to the scheme.

Private Water Supplies

132. The NPS (para 5.219) identifies the potential adverse impact of infrastructure developments on local water quality, which in this case would include those sources of private water supplies in the area impacted by the proposed scheme.

Considerations

133. 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.

Recommended Requirements on Private Water Supplies

134. These include:
- a) The private water supplies and associated hydrology and land drainage must be protected from any impacts from both the construction and operational phases of the scheme, including any sewage disposal from construction compounds.
 - b) A CEMP is to be submitted to and agreed by the Local Authority prior to the commencement of the construction phase to identify mitigation measures to prevent potential contamination of ground water sources from the construction phase.
 - c) Mitigation measures must be in place to prevent potential contamination of ground water sources from the final scheme's operational infiltration road drainage system.

8. Ecology and Landscape Considerations

135. Wiltshire Council has regulatory responsibility for managing Wiltshire's natural environment and landscape. These responsibilities include oversight of:
- International – Special Areas of Conservation, Special Protection Areas and Ramsar Sites
 - National – Sites of Special Scientific Interest and National Nature Reserves
 - Local – County Wildlife Sites, Protected Road Verges and Local Geological Sites
 - Area of Outstanding Natural Beauty (AONBs)
 - New Forest National Park (NFNP)
 - Stonehenge and Avebury World Heritage Site (WHS).
136. The NPS (para 5.144) identifies the need for the assessment of likely significant landscape and visual effects in accordance with current best practice. In decision making, great weight should be given to nationally designated landscapes and their settings (para 5.150-5.155).

137. The NPS (para 5.20-5.23) further identifies the requirement for projects to demonstrate how biodiversity gain is achieved. This includes the identification of all potential impacts on statutory and non-statutory designated sites for nature conservation and on protected species (para 5.26-5.35) and the provision of appropriate and sufficient mitigation measures (para 5.36-5.38).
138. Core Policies 50 and 51 of the WCS seeks to protect, conserve and enhance Wiltshire's distinctive ecology, habitats and landscape character. Wiltshire Council welcomes the opportunity to advise on these important proposals.

Western Section

139. A soil handling strategy should be prepared to current best practice for the handling and placement of soils at Parsonage Down east.
140. The applicant should provide cut and fill calculations to give confidence that there will be neither a shortfall nor a surplus of material to achieve the design proposal, either of which could have an impact on landscape, visual and ecological effects.
141. Acoustic modelling for the acoustic / screen bunds e.g. to the north of Winterbourne Stoke and acoustic barriers e.g. to the Till Valley flyover should be provided to demonstrate the design is fit for purpose.
142. Detailed design proposals for the green bridges where they have an ecological function should be wholly agreed in advance of approval / construction.
143. While the creation of additional chalk grassland at Parsonage Down is very welcomed, there is concern that some existing "stepping stones" of chalk grassland that support significant populations of rare invertebrates and which are within HE's current soft estate, are becoming degraded due to lack of appropriate management, particularly the Protected Road Verge at Yarnbury Castle. The scheme could include a target to incorporate remedial management of this road verge, to maximise the effectiveness of the provision of new habitat for invertebrates in the local area.

River Till Viaduct

144. Officers are very supportive of the multi-span decks that allows for the penetration of light to the River Till.
145. A screen to the parapet would be preferable to provide acoustic attenuation. Although it will not provide visual screening per se, it could reduce light spill from car headlamps if constructed from appropriate materials.

A303 / A360 Longbarrow Junction

146. The isolated 'internal' grass verges could provide a green refuge for invertebrates and sedentary slow worms. Recommend seeding with a suitable wild flower mix and implementing appropriate monitoring and management.
147. The no lighting design for dark skies is welcomed. However, if it is shown necessary to light the junction, consideration must be given to Annex II bats which may be crossing at this point,

which is slightly west of the existing junction. This should be checked once the bat data has been analysed and interrogated.

Central Section

148. Consideration should be given to any opportunity to underground the existing overhead electricity cables and removal of the pylons.

Location of Green Bridge No. 4

149. The, as yet, unpublished bat data should be consulted to determine if there are any ecological reasons why Green Bridge 4 should **not** move to the east.
150. There are not really any landscape impacts for either option, however either may have a bearing on the WHS.

Cutting on the Western Approach to the Tunnel

151. With regard to landscape and ecology, either option would provide similar effects. Obviously, the green banks (rather than a retained structure) would be more beneficial for local landscapes, habitats and driver experience, however it is understood that consideration given to land taken within the WHS will weigh heavily in the planning balance.
152. The retaining wall design does give rise to a dramatic fall and there is no mention of safety rails or fencing. This has landscape (visual) and ecological implications e.g. fencing would need to secure the site from a variety of wildlife (e.g. from the smaller brown hares and hedgehogs to larger badgers and deer), visitors to WHS, farmers and livestock.

Western Entrance to the Tunnel

153. With regard to landscape and ecology, officers will support either option of tunnel entrance design.
154. The canopy design is a technical issue to be resolved, however officers consider that either will have similar landscape and ecological benefits. However, the open canopy could generate some adverse landscape and ecological effects from escaping light pollution at night and protective fencing. It is felt that there is a possibly unknown potential impact for ecology e.g. bats flying through the holes, other wildlife falling through. The holes would need to be grated.

Eastern Section A303 Flyover at Countess Roundabout

155. The existing roundabout is landscaped with trees and shrubs. Changing the design to the open un-landscaped flyover represents a loss for biodiversity.

Preliminary Environmental Information Report (PEIR)

156. Officers are continuing to work with HE consultants in scoping the Landscape and Visual Impact Assessment (LVIA). At this stage, the PEIR has identified potential landscape and visual impacts during construction and operation including:

- a) Direct physical and temporary change to the rural landscape as a result of construction, storage compounds and PROW diversions.
 - b) Several high sensitivity receptors including residents of Winterbourne Stoke, PROW and visitors to WHS will experience temporary adverse visual effects during the construction period.
 - c) In operation, there are likely to be permanent beneficial landscape and visual effects due to improved tranquillity, habitat creation and a reduction in landscape severance.
 - d) Residual adverse visual effects will remain within the Till Valley due to the viaduct and for the users of the PROW network.
 - e) Primary mitigation is embedded within the project. It is welcomed that the design and mitigation is based on a landscape character approach e.g. following the smooth rolling contours that characterise chalk downland avoiding harsh engineered lines.
157. The PEIR identifies potential impacts to ecology in fairly general terms at this point in time, although it is considered that all major issues have been highlighted and where necessary, these will be further investigated.
158. It is understood that analysis of the bat data is still ongoing. All bats are protected under European and UK legislation, especially those listed on Annex II of the European Habitats Directive. Once the survey data has been comprehensively examined, Wiltshire Council will work with HE to ensure sufficient mitigation measures are implemented such that the scheme will be compliant with current legislation.
159. However, a significant amount of survey effort has been conducted in relation to this proposal and efforts have been made to avoid the most sensitive habitat areas that support or potentially support protected species. It is welcomed that the positioning of the proposed route will not result in loss of any irreplaceable habitats and that the scope to create new and replacement habitats has been identified. With suitable management prescriptions within the footprint of the scheme and of adjacent HE soft estate, there is potential for a net gain for biodiversity.

Recommended Requirements

160. Further requirements in addition to the ES should include:
- a) A holistic Landscape and Ecological Mitigation Strategy that combines the recommendations from the LVIA and ecological survey reports.
 - b) A Landscape and Ecological Management Plan (LEMP) which details the maintenance and management of HE 'soft' estate for the section of road in the short, medium and long term to ensure the success and viability of newly created habitats / landscape mitigation.
 - c) A CEMP that details the methods of protection for ecological systems during the construction process.
 - d) A Soil Handling Strategy detailing the storage and placement of soils to be used for the land raise at Parsonage Down east and the restoration of chalk grassland habitat.

- e) Acoustic modelling as detailed above.
- f) That the SoS considers appropriate conditions on any permission to secure the above-mentioned objectives to be discharged in liaison with Wiltshire Council at the appropriate point of the implementation process.

9. Archaeology and World Heritage Site Considerations

Background and Policy Context

- 161. The Wiltshire Council Archaeology Service (WCAS) has a statutory duty to advise the Local Planning Authority on the impact of development proposals on archaeological remains in the County, both within and outside of the Stonehenge and Avebury WHS. Officers 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 OUV. In relation to the A303 Improvement Scheme (the Scheme), the service will also have a responsibility for the monitoring and discharge of archaeological conditions / requirements imposed as part of the DCO. In addition to its formal statutory role, WCAS have been engaged with the proposed Scheme's development over the last few months via a number of working groups associated with the project such as the Heritage Monitoring and Advisory Group and Scientific Committee.
- 162. 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.
- 163. In assessing the potential development impacts of the proposed Scheme, WCAS 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 for the protection and enhancement of the OUV of the WHS. This plan has been formally endorsed and adopted by Wiltshire Council in 2015.
 - The WCS (2015) includes a specific robust policy (Policy 59) to ensure the protection of the WHS and its setting from inappropriate development to sustain its OUV.
 - National Planning Policy Framework (NPPF 2012) paras 128-9 and 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.
 - National Policy Statement for National Networks (2014) paragraphs 5.120-142
 - 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 OUV.

Preliminary Environmental Information Report (PEIR)

164. Chapter 6 of the PEIR considers the likely significant effects on the Scheme on cultural heritage. The chapter will be used as a baseline for the development of the Environmental Impact Assessment (EIA) and the Heritage Impact Assessment (HIA). The PEIR is general and provisional, at this stage the impacts cannot be fully assessed until the results of the forthcoming archaeological evaluation fieldwork can be considered.
165. The PEIR identifies that changes from the implementation of the proposed Scheme will produce potential impacts on individual heritage assets both inside and outside of the WHS; the attributes of OUV of the WHS; and on the OUV of the WHS as a whole. The impacts can be positive, negative, or a combination of both.
166. The document details the general benefits of the Scheme which include the removal of the existing severance caused by the A303 at the centre of the WHS between the proposed portal locations. This will improve the setting of key groups of monuments and improve access and visual connectivity between them. The removal of the A303 as it crosses the Avenue to the west of the proposed Eastern Portal will help to reconnect the two parts of this linear monument currently severed. The removal of the Longbarrow Roundabout and stopping up of the A360 at this point will be beneficial to the setting of the Winterbourne Stoke Barrow Cemetery Group and its visual relation with other barrow groups in the western part of the WHS.
167. A number of potential adverse impacts on heritage assets are also outlined and include the removal of around a dozen archaeological features in the line of the new carriageways and portals, impact of new infrastructure on the setting of monuments and new severance within the WHS caused by the proposed western portal approach road. Although some mitigation measures can be built in to minimise impacts, the potential adverse impacts cannot be removed completely.

Key Issues by Scheme Area

Western Section: Winterbourne Stoke Bypass to Longbarrow Junction

Parsonage Down East

168. The proposed deposition of chalk from the tunnel in this location is going to negatively impact on a number of known archaeological features, including settlement and burial features from prehistoric and Roman times. The area has not yet been archaeologically evaluated. When it is, it is likely that further features will be identified and some of these may be highly significant and may need to be preserved in situ at the current ground surface level. Until the evaluation and assessments of this area are completed (with requisite consents from the land owner) it is too early to judge if the proposed deposition and landscaping will be acceptable across the whole of this area.

River Till Viaduct

169. Archaeology officers have no preference for either option presented (a or b).

A303 / A360 Longbarrow Junction

170. WCAS welcome the Scheme's approach to minimising light pollution impacts by not providing permanent surface lighting within the WHS or at the proposed Longbarrow junction. However, design solutions and options are needed to minimise light pollution to dark skies from car headlights.

Central Section: Within the WHS

The Cutting in the WHS on Western Approach to Tunnel

171. The proposed new length of expressway within the WHS will be damaging to below ground archaeological features and to the visual setting of monuments and groups of monuments in the WHS. The damage can be minimised to some extent by the proposal to put it within a deep cutting. The option to use vertical retaining walls to minimise land take to a width of 41 metres is the more desirable option.

Green Bridge No. 4

172. The new landscape severance caused by the new cutting within the WHS needs further mitigation than currently proposed. There is an issue here with severance of the visual relationship between the barrow groups north and south of the proposed new road cutting, especially the Winterbourne Stoke Group and Diamond Group which needs to be minimised. Physical access is also severed in this location. The proposed Green Bridge No. 4 at the A360 crossing will provide some mitigation but not enough. An alternative bridge is proposed at 150m east of the junction. The service's view is that both bridges are required to minimise the impact on the WHS. Therefore, the preference is for both option a and b. The width of each bridge needs to be carefully considered and assessed in relation to the visual setting of key monuments. In WCAS's view, both together a minimum combined length of 100 metres will be required. There is a consensus from other Council services that this approach is acceptable.

Western Portal

173. The Western Portal is proposed to be located within the WHS north west of Normanton Gorse immediately to the south of the existing A303. Two options have been presented for the tunnel entrance and canopy. In order to minimise visual impact on attributes of OUV, the fully grassed canopy would be preferable. This will also help to minimise light pollution. Therefore, officer's preference is option a: fully grassed over canopy with external buildings.

Proposed Link (BOAT) Between Byways 11 and 12

174. This proposed new link will have a negative impact on below ground archaeology and on the setting of key monuments in this part of the WHS.
175. The proposal is in contradiction of Policy 6b of the WHS Management Plan (2015): *Manage vehicular access to byways within the WHS to avoid damage to archaeology, improve safety and encourage exploration of the landscape on foot.*
176. WCAS advise that this proposal is removed from the Scheme.

177. Other approaches and options have been outlined in paragraphs 89-98. Option 3 seems to be the most suitable and this would be an acceptable way forward.

Eastern Section: Countess Junction to Just Beyond Solstice Park Junction

Eastern Portal

178. The Eastern tunnel portal is proposed to be located to the East of King Barrow Ridge and the Avenue. The design and location of the portal needs to carefully consider the setting of key monuments in this part of the WHS, especially the Avenue to the east and Vespasian's Camp to the south.

Rollestone Crossroads

179. The proposed modified highway layout at Rollestone Corner is in an area of significant designated and non-designated archaeological monuments. This area has not yet been evaluated. An evaluation will need to be completed and the results included in the EIA.

Countess Flyover

180. Two options are presented for the flyover. Internationally significant Mesolithic remains and deposits with paleoenvironmental potential have recently been discovered in and around the Blick Mead area relating to the River Avon (south west of Countess roundabout and West of Amesbury Abbey). Therefore, the design of the flyover infrastructure needs to be minimised to protect these deposits with a solution having minimum ground intrusion. The visual setting of the Iron Age hillfort at Vespasian's Camp also needs careful consideration. Until further work is done, it is not clear if option a or b will be preferable in terms of ground impact and setting.

South of A303 / Solstice Park

181. In order to facilitate the proposed closure of the Allington Track, a new route is proposed to be created between the Allington Track and Equinox Drive in Solstice Park. This proposal includes a divergence of the AMES 1 byway to avoid the group of Scheduled Barrows (Ratfin Barrows). This proposal is welcomed. However, the new proposed divergence of AMES 1 cuts across an area which has known archaeological features and has not been subject to archaeological evaluation and assessment. This needs to be undertaken and mitigation measures proposed in order for this to be acceptable.

Construction Compounds: Material Storage and Stockpile Areas

182. Compounds and temporary spoil storage areas have been proposed outside of the WHS. WCAS are aware that some of these are archaeologically sensitive. Others have not yet been evaluated and need to be as soon as possible and the results fed into the EIA. The proposed compound and spoil storage area at Countess East contains significant archaeological remains including a Roman building and Saxon settlement. It may be difficult to use some or all of this area as proposed. Detailed consideration of the archaeological remains here will need to be set out in the EIA and Mitigation Strategy (see below).
183. Mitigation requirements for these areas will need to be addressed in the CEMP.

Archaeological Evaluation and Assessment: Further Requirements

184. A considerable amount of archaeological evaluation, both within and outside of the WHS, is still required before the submission of the DCO. This includes the Western and Eastern portal sites, the Winterbourne Stoke bypass section, the new junction area and the new dual carriageway within the WHS. An Archaeological Evaluation Strategy has been agreed by WCAS and a detailed programme for the work has also been agreed. Although the programme has started at the Eastern Portal site (February 2018), there has been some delays with the start of work in other areas. The evaluation will need to include not only total coverage of the proposed expressways, portals and junctions but also the proposed road all drainage areas, attenuation ponds, compounds, access routes and spoil storage areas. Officers stress that all of this work needs to be in advance of the submission of the DCO.
185. WCAS would advise that this is completed as early as possible so that the results can be used to help influence the final design of the Scheme and will inform the EIA and Mitigation Strategy.
186. Officers would expect to see a full and detailed ES 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 proposed Scheme.
187. These assessments will need to consider construction impacts, and temporary impacts need to be assessed in the same way as permanent impacts (direct and indirect). The results of the EIA and HIA will need to feed into an Archaeological Mitigation Strategy and CEMP. These documents will need to be presented with the DCO.

Conditions and Requirements

188. An Archaeological Mitigation Strategy will need to be agreed and its implementation secured by a condition / requirement attached to any grant of consent. The Strategy may include the need to preserve in situ key archaeological remains or a programme of archaeological excavation and recording (including reporting, publication and dissemination of the results).

Community Benefits and Legacy

189. The provision of a Community Benefit Fund or equivalent to help deliver heritage benefits of the proposed Scheme is essential. Measures should be made for the provision of adequate museum storage for finds and archaeological archives arising from the archaeological fieldwork, as well as heritage interpretation and implementation of projects linked to the key objectives in the WHS Management Plan (2015).

Summary of Archaeological and Historic Environment Issues

190. WCAS over the last few months has worked in conjunction with other heritage agencies and HE in developing the proposed Scheme. What officers 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. There is, as yet, no EIA or HIA.

- 191. It is clear that the removal of the A303 through the WHS inherent in the proposed Scheme will bring huge benefits for the centre of the WHS. However, there will be some adverse impacts from the proposed new infrastructure especially on the west side of the WHS with the construction of a new length of expressway.
- 192. The EIA and HIA must objectively assess potential impacts and if they can or can't be mitigated, as well as benefits. Only once these assessments have been done can a carefully considered decision be made on the relative balance of beneficial or adverse impacts on heritage and the OUV of the WHS.
- 193. If the archaeological evaluation, EIA and / or HIA, raises significant adverse impacts that cannot be mitigated, then WCAS may have to raise these as concerns in our DCO response.
- 194. This, and a number of other issues raised above, will need to be addressed in the DCO application in order for the WCAS to recommend full support of the final Scheme.

10. Built Heritage Considerations

- 195. The scheme affects several built heritage assets, both designated and undesignated. These were highlighted in the earlier consultation response; since then, all sites of interest along the route have been visited by the relevant officer with the AECOM heritage consultant, and general agreement exists regarding the likely extent of the scheme's impacts. There are no aspects that are considered likely to reach a level of 'substantial harm', in NPPF terms; where 'less than substantial harm' is identified, the NPPF provides for a balancing exercise with public benefits.

Key Considerations From West to East

Winterbourne Stoke Conservation Area (CA), Manor House (II*)

- 196. The removal of the busy road from the northern edge of the settlement (bar a very small number of roadside dwellings on the north side of the road) would be positive in that it would be a quieter and safer place.
- 197. The disconnection of the village from the through-traffic is perhaps also a minor negative impact, in that it becomes a quiet rural village with few reasons to visit; one would imagine there would be an impact on the viability of the two businesses reliant on passing trade, however these are outside of the CA and therefore contribute little to its character and setting.
- 198. View to the north of the CA, up the Till Valley, will be significantly altered with the introduction of the viaduct and the associated landscaping. This is higher than previously anticipated; however, it is also visually lighter in terms of construction, the degree of visible structure (especially below the carriageways) is pleasingly modest; officers see no particular reason on heritage grounds to express a preference for the parapet treatment. The planting of the eastern embankment would help hide it, and there are other pockets of trees in the surrounding landscape so they won't look out of place as they might on top of the Plain.
- 199. The new Till Valley crossing would have an increased impact on the setting and outlook of the cottages at Foredown House and the barn at Foredown Barn (960m NNE of the cottages), but these are both undesignated and only of local interest, with the level of harm to their heritage significance being at the lower end of 'less than substantial'.

Milestone, 850m East of Longbarrow Roundabout (II)

200. The milestone itself would, in officer's opinion, be unaffected however it would now be alongside a byway rather than a major route. Milestones are of course not widely relied upon by travellers in the 21st century and the improved ability to stop and look at them safely, is also a benefit.

Stonehenge Cottages (Undesignated, of Modest Heritage Interest)

201. The setting of the cottages would be significantly changed by the proposals; however, this seems to be entirely positive with the removal of the busy road from its surroundings, making it much quieter and safer.

Milestone, Stonehenge Road, West Amesbury (II)

202. The milestone itself would be unaffected however it would now be on a dead-end rather than a major national route. This has also previously been affected, when the A303 turned it into a slip road.

Amesbury Abbey (Grade I), its Park (II*), Lodges (Kent and Diana's House, both II*), Follies (II*), Boundary Walls (II* and II), Bridges (II* and II), all within Amesbury Conservation Area

203. The setting of the lodges and bridge on Countess Road would be affected to a modest degree by the flyover, this impact, while greater than the existing roundabout layout, would still be at the lower end of the scale as that area of its landscape setting is already so altered.
204. The park is bounded by or very close to the A303 for about 1.6km. There is a significant barrier of trees and other vegetation between most of the designated assets and the road, and this appears to be retained entirely; the area of the registered park that abuts the road is less formally laid out than much of the rest. A belt of trees on the north side of the A303 contributes positively to the outlook from the roadside edge of the park, the future of which isn't clear from the consultation document. There appears to be no negative impact on the setting of the Abbey and the park.

Countess Farm (Farmhouse, Two Granaries, Two Barns and Stables, All Grade II)

205. This site is most affected by the scheme, lying immediately adjacent to the highways of both A303 and Countess Road. The flyover would be elevated along its southern boundary, thus introducing views of high level traffic and increased noise to the site. Efforts should be made to ensure that the existing trees and vegetation along the southern boundary are retained, so as best to mitigate the impacts on the farmstead. Where this proves impossible, similar new planting should be required. Certainly, the impacts on this site would be significant; it is certainly arguable that the proposal would only slightly worsen an existing negative impact, when compared with its pre-A303 setting, and that this must therefore be 'less than substantial'. Visual links between the south and north sides of the A303 are already prevented by the landscaped roundabout, so it is the view of officers that the landscaped flyover offers a more rural-friendly view than the urban-engineering look of the open option.

Ratfyn Farm (Grade II) Lies Around 200m to the North of the Existing Carriageway

206. Traffic separation for the flyover begins at about this point, but the prominence of the road would be little altered, it would remain set against the treed cliff of Lords Walk. Streetlighting of this area would have a degree of urbanising effect on the setting of the Listed Building; if it is essential, then it should be tightly focused on the relevant area and not spill any more than absolutely necessary.

11. Flood Risk and Drainage Considerations

207. As Lead Local Flood Authority (LLFA), Wiltshire Council has a number of duties and powers to control and minimise flood risk under planning legislation, the Flood and Water Management Act 2010, the Land Drainage Act 1991 and the Wiltshire Land Drainage Byelaws 2014. This scheme may have impacts on all aspects of Ground Water and Surface Water, standard highway drainage and a number of consents from both Wiltshire Council and the Environment Agency concerning water quality and volumes of water may need to be addressed as pre-requisites for the DCO on a case-by-case basis.
208. Although the overarching strategy is now in place, HE will still need to supply further details on ground investigations prior to final approval by the Council. Ongoing monitoring of boreholes is being undertaken by HE and their consultants to allow a greater understanding of the catchment issues within the scheme's catchment. Long term monitoring for up to 5 years after construction is expected to be required and the monitoring equipment may also need to remain in place after construction in order to confirm that the design is functioning as intended and address any mitigation works.
209. The application will be required to comply with all planning policies and decisions on planning applications for major developments to ensure that sustainable drainage systems (SuDS) for the management of run-off are put in place. This will need to include consultation with Wiltshire Council as LLFA on the management of surface and ground water. It will be for HE to demonstrate that the proposed scheme will not increase the flood risk to others within the catchment area. The Council will need to be able to satisfy themselves that the proposed minimum standards of operation are appropriate.
- a) The DCO will need to ensure that there are clear and ongoing maintenance arrangements for ongoing maintenance of the highway drainage systems over the lifetime of the development. Consents may be required for all works within 8.0m of watercourses under the Wiltshire Land Drainage Byelaws 2014 and HE will therefore need to ensure compliance with the 2014 Byelaws where working within 8 metres of a watercourse.
 - b) The proposed development may need to include SuDS to ensure that the discharge from the site has been reduced (this is covered under planning policies etc.). Peak flow control (ensuring that peak flow from the developed site is minimised, to reduce flood risk downstream) and rate of run will need to ensure the peak flow is no worse than at present. Volume control (ensuring that the total volume of runoff from the site is minimised, to reduce flood risk downstream) and overall quantity of water entering local watercourses arising from run off from the site should be no worse than existing position. However, concerning flood risk on and off site, planning policy requires an overall reduction of flood risk of 20%.

- c) Designing for long term maintenance considerations will need to be within the design statement so far as frequency and methods are concerned.
210. Flood and drainage officers are happy with the progress so far in respect of the potential land and highway drainage impact although HE will need to ensure that all planning conditions and government guidance such as Planning Policy, Ciria Guidance, Water Framework Directive (WFD), and the Flood and Water Management Act 2010 are fully complied with.

12. Procedural Issues and Next Steps

211. As a NSIP, this scheme will be dealt with under the 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 statutory consultation response. The Council wish to make clear to HE that it is fully committed to the DCO process, and supports this proposal in principle, but subject to the making of an objective balanced planning judgement in relation to the outputs of the assessments necessary to address the detailed comments set out in this consultation response.
212. For clarity, the Council has summarised the information and activities required to be undertaken in advance of the DCO application from its perspective and those requirements which it believes should be included within the DCO documentation in Appendices 1A and 1B respectively. These are not intended to be an exhaustive list as additional requirements may be identified once the detailed designs for the scheme are more advanced.
213. The Council asks that HE takes these comments into full consideration.

Appendix 1A

Information / Activities Required in Advance of DCO Application

1. Within its consultation response, the Council has summarised the information and activities required to be undertaken in advance of the DCO application in order for it to be able to fully assess the scheme proposals and their associated impacts. For ease, these have been replicated in the paragraphs below.
2. This is not intended to be an exhaustive list and further information, assessment and documentation may be identified as required once the scheme proposals are further developed.

Detailed Scheme Design Proposals:

3. It is acknowledged that the detailed scheme design is still evolving and will be influenced by consultation responses and assessment and survey data. However, Wiltshire Council requires clarity on the following aspects of the scheme proposals:
 - a) The exact arrangements for the western section of the existing road at the western end between the existing eastbound layby and the tie-in area and the specifics of access to be provided.
 - b) The exact arrangements for the old A303 through Winterbourne Stoke village, including the incorporation of any traffic calming measures.
 - c) The exact arrangements for the local road created by de-trunking the existing A303 from the layby west of Winterbourne Stoke to a point east of the village where the route will change to accommodate access to the proposed grade separated Longbarrow junction.
 - d) The exact arrangements for the downgrading of the existing A303 to the east of Longbarrow for non-motorised users and any exemptions for private access to agricultural land as required.
 - e) The exact arrangements for the creation of a right of way from Longbarrow to the junction with Stonehenge Road, to the east of Amesbury.
 - f) The exact arrangements and future use for the old A303 to the east of Stonehenge Road junction.
 - g) The alignment of the bridge structure for B3083 and the proposed applicable standards.
 - h) The outcome of the risk assessment to be undertaken on any compromises to lighting at Longbarrow junction.
 - i) The exact arrangements for the right of way to be created on the redundant length of the existing A360 to the south of the new A303 resulting from the new Longbarrow junction.
 - j) The exact arrangements for all impacted PROW, including SLAN 3, BSJA 3A, BSJA 3, WSTO 3, WSTO 2, WSTO 7, WSTO 5 and WSTO 6B, resulting from scheme proposals in the Western Section of the scheme.

- k) The detailed design proposals for the green bridges.
- l) The exact arrangements to be employed for grass verge management, protection, enhancement and monitoring.
- m) The exact arrangements for the pedestrian and cycle link created using the redundant A360 carriage to the north of the new A303 extended through to the Visitor Centre.
- n) The exact arrangements for the Old Stonehenge Road, including the provision of a turning facility and vehicular access arrangements for the two affected farms and Stonehenge Cottages.
- o) The exact arrangements for all impacted PROW, including AMES 12, AMES 11 and AMES 10, resulting from scheme proposals in the Central Section of the scheme.
- p) The exact arrangements for the tunnel approach and portal designs, including the provision of any safety rails, fencing or grating and associated lighting.
- q) The exact arrangements for the signalisation of the existing Countess roundabout and creation of a cycle track.
- r) The exact arrangements for the design of the Countess flyover infrastructure, including any planting / screening proposals.
- s) The exact arrangements for Amesbury Road to the north side of the A303.
- t) The exact arrangements for the proposed Double Hedges local junction changes.
- u) The exact arrangements for the new link between Allington Track and Amesbury Road on onwards to an extension of the adopted part of Equinox Drive resulting from the proposed closure of the Allington Track junction with the A303, including the provisions for large loads.
- v) The exact arrangements for the modification of Rollestone Crossroads junction, including the agreement of applicable standards and any resultant modification to the current local road network.
- w) The exact arrangements for all impacted PROW, including AMES 44, AMES 1 and AMES 2, resulting from scheme proposals in the Eastern Section of the scheme.
- x) The construction methodology and associated plant requirements.
- y) The exact arrangements for the excavation, re-use, storage and transportation of material arising from earthworks associated with the tunnel scheme.
- z) The exact arrangements for the required construction materials, including the source and associated vehicle movements associated with its delivery to site.

- aa) The exact arrangements for access to the primary construction compound sited to the west of the A360 near Longbarrow, and satellite sites at Countess and close to the River Till viaduct, and any associated impact / requirements for the local road network.
 - bb) Regulatory requirements required as result of the road improvement scheme. These should be identified and addressed by HE in consultation with the Council. Requirements may include potential speed, weight and waiting restrictions, as well as any orders to regulate traffic calming in Winterbourne Stoke and potential Cycle Track Act orders to regularise use of paths by cyclists.
4. Agreement from the Council should be sought on the above, once the proposals are finalised.

Surveys / Further Assessment Required to be Completed:

5. It is acknowledged that a large amount of survey and analysis work has been completed to date. However, all parties recognise that more is needed to be undertaken to fully assess the impacts of the scheme.
6. Council officers have identified the need for the following survey / further assessment work to be undertaken and urge HE to complete this as soon as possible.
- a) Baseline noise survey to be conducted at a selection of locations along the proposed scheme route.
 - b) Analysis and interrogation of Annex II bat data.
 - c) Acoustic modelling for the acoustic / screen bunds and acoustic barriers.
 - d) Archaeological evaluation fieldwork to be completed and considered for the Western and Eastern portal sites, the Winterbourne Stoke bypass section, the new junction area and the new dual carriageways within the WHS, all compounds, soil storage areas and drainage / ponds with appropriate mitigation identified and incorporated into scheme proposals.
 - e) Ground investigations from a flood risk and drainage perspective to be undertaken and information supplied to the Council for consideration and agreement.

Scheme Impacts:

7. Once the detailed design proposals for the scheme are known, further information will be required by the Council in order to fully assess the associated impacts of the proposals. To assist the Council with this, further information is required as follows:

Highways and Transport

Local Roads:

- a) Clarification on the apparent inconsistencies in the consultation documentation relating to traffic impacts and detailed explanation of the forecasted levels.

- b) Refinement of the forecast traffic flows at the very local level is required for agreement with Council officers.

Public Protection

- c) Detailed assessment of noise and vibration impacts associated with the scheme proposals to be undertaken, for agreement of appropriate mitigation measures with the Council.
- d) Detailed assessment of air quality impacts associated with the scheme proposals to be undertaken, for agreement of appropriate mitigation measures with the Council.
- e) Detailed assessment of light nuisance associated with the scheme proposals to be undertaken, for agreement of appropriate mitigation measures with the Council.
- f) Detailed assessment of impacts to private water supplies associated with the scheme proposals to be undertaken, for agreement of appropriate mitigation measures with the Council.

Ecology and Landscape

- g) Cut and fill calculations should be provided to give confidence that there will be neither a shortfall nor a surplus of material to achieve the design proposal, either of which could have an impact on landscape, visual and ecological effects.
- h) Acoustic modelling for the acoustic / screen bunds e.g. to the north or Winterbourne Stoke and acoustic barriers e.g. to the Till Valley viaduct should be provided to demonstrate the design is fit for purpose.

Archaeology and World Heritage Site

- i) Archaeological evaluation fieldwork to be completed and considered to assess impact of scheme proposals on designated, non-designated and unidentified archaeological features.
- j) Impact to dark skies to be considered from road and junction lighting and car headlights to ensure design solutions and options minimise light pollution.
- k) Visual setting impacts associated with Countess flyover and Till Valley viaduct to be assessed and mitigated.

Documentation to Accompany DCO Application:

- 8. A comprehensive suite of documentation is required to accompany the DCO application for this scheme. Wiltshire Council requests that this includes the following:
 - a) An Environment Statement which must objectively scrutinise the potential impacts on all aspects of the scheme, including the historic environment and OUV.
 - b) A full and detailed Heritage Impact Assessment.
 - c) A full and detailed Environmental Impact Assessment.

- d) A Construction Environmental Management Plan which addresses impacts relating to noise and vibration, air quality, light nuisance, potential contamination of ground water sources, protection of ecological systems and impacts on archaeological features with associated mitigation relating to the construction phase of the scheme.
 - e) A Soil Handling Strategy, which is prepared in accordance with current best practice, for the handling and placement of soils at Parsonage Down east and the restoration of chalk grassland habitat.
 - f) A Landscape and Visual Impact Assessment.
 - g) A holistic Landscape and Ecological Management Plan, which detail the maintenance and management of HE 'soft' estate for the road in the short, medium and long term to ensure the success and viability of newly created habitats / landscape mitigation.
 - h) An Archaeology Mitigation Strategy.
 - i) A Flood and Drainage Strategy.
9. These documents should be prepared by HE in conjunction with Council officers and partner organisations, with draft copies available for review and agreement prior to submission.

Appendix 1B

Requirements for Inclusion in DCO Application

1. The Council has identified a number of requirements, which it believes should be included within the DCO application, within its response to the statutory consultation. These are replicated within the paragraphs below for ease.
2. These are not intended to be an exhaustive list and further requirements may be identified as the scheme proposals are further developed.

Highways and Transport

Local Roads:

3. A requirement will be sought for those parts of the A303 to be de-trunked to secure an asset which will not require foreseen structural maintenance interventions for at least 5 years following the asset being vested in Wiltshire Council.
4. If street lighting is deemed to be unnecessary on safety grounds, then the Council will need to protect its future interests in the roundabouts at the junction through an undertaking from HE to undertake a Stage 4 (Monitoring) Road Safety Audit at least 12 months following the completion of the scheme. A Stage 4 Road Safety Audit will help provide evidence of the need for lighting, or not, as the case may be.
5. A contribution will be sought by the Council towards the future energy and maintenance costs associated with any traffic signals to be provided on the Countess Roundabout (for those costs which might fall to the responsibility of Wiltshire Council).
6. A requirement will be sought to secure appropriate provision for large load vehicles to pass general traffic on the line of the alternative Allington Track connection to A303.
7. A condition will be sought to secure a scheme for the management of diverted traffic when access through the tunnel is partially or wholly unavailable. The scheme shall set out arrangements for the signing of the alternative route and the management of traffic at the local, regional and national level to ensure that motorists are least inconvenienced by planned and unplanned closures, and that local diversion route traffic loads are minimised.
8. There will be a requirement to ensure that an acceptably designed scheme for the realignment of the Rolleston Crossroads junction is secured and implemented in accordance with a programme of works to be agreed.
9. A requirement will be sought to ensure that the management of haul routes to and from the site, for inbound road and tunnel-making materials and outbound waste respectively maximises use of the trunk road network and minimises use of the local road network.
10. A requirement will be required to ensure that appropriate pre-commencement and post works visual and / or structural carriageway surveys are undertaken to ensure that any contract works roads damage can be identified and rectified at no cost to Wiltshire Council.

11. A requirement will be sought to ensure that all traffic regulation orders relevant to this scheme are addressed within the DCO process and that the Council is compensated for any costs that it may incur in respect of any traffic regulation orders for which the Council might be responsible arising as an indirect consequence of the A303 Stonehenge Scheme.

Public Protection

Noise and Vibration:

12. A qualitative assessment of noise and vibration impacts arising from construction works must be undertaken and included in the Environmental Statement that will be submitted with the DCO application.
13. A requirement that a Construction Environmental Management Plan is to be submitted to and agreed by the Local Authority prior to the commencement of the construction phase to identify measures to mitigate noise and vibration from the construction phase of the scheme, including the siting, construction and operation of construction compounds and satellite offices, and use of low noise / low vibration methods. Specific emphasis is to be made to mitigating noise from construction of the elevated sections of the road at Countess Roundabout and over the River Till north of Winterbourne Stoke, and vibration at Stonehenge Cottages from the tunnel boring operations.
14. Requirement to meet prior consent process under Section 61 of the Control of Pollution Act 1974 in respect to the construction phase of the scheme.
15. Details of noise associated with the operation of plant serving the tunnel are to be agreed with the Local Authority prior to its commissioning.
16. Tyre generated road noise shall be minimised from the scheme to protect the local amenity.
17. Road noise exposure shall be minimised for receptors from the viaduct over the River Till north of Winterbourne Stoke, and from the flyover at the Countess roundabout to protect the local amenity.

Air Quality:

18. No materials shall be burnt on the development site during the construction phase of the scheme.
19. A Construction Environmental Management Plan is to be submitted to and agreed by the Local Authority prior to the commencement of the construction phase to identify measures to mitigate dust generated during the construction of the scheme.
20. Traffic diversions should not involve routing traffic through Air Quality Management Areas (AQMAS).
21. To examine the legacy impact of the development on Air Quality on A36 and A350 AQMAS and implement mitigation measures where a negative impact on Air Quality is predicted at relevant receptors.

Light Nuisance:

22. A Construction Environmental Management Plan is to be submitted to and agreed by the Local Authority prior to the commencement of the construction phase to identify measures to mitigate light nuisance from artificial lighting used as part of the construction phase.
23. All artificial lighting shall be so sited as not to cause light intrusion or nuisance to residential dwellings in the area adjacent to the scheme.

Private Water Supplies:

24. The private water supplies and associated hydrology and land drainage must be protected from any impacts from both the construction and operational phases of the scheme, including any sewage disposal from construction compounds.
25. A Construction Environmental Management Plan is to be submitted to and agreed by the Local Authority prior to the commencement of the construction phase to identify mitigation measures to prevent potential contamination of ground water sources from the construction phase.
26. Mitigation measures must be in place to prevent potential contamination of ground water sources from the final scheme's operational infiltration road drainage system.

Landscape and Ecology:

27. Further requirements in addition to the Environmental Statement should include:
 - a) A holistic Landscape and Ecological Mitigation Strategy that combines the recommendations from the LVIA and ecological survey reports.
 - b) A Landscape and Ecological Management Plan (LEMP) which details the maintenance and management of HE 'soft' estate for the section of road in the short, medium and long term to ensure the success and viability of newly created habitats / landscape mitigation.
 - c) A CEMP that details the methods of protection for ecological systems during the construction process.
 - d) A Soil Handling Strategy detailing the storage and placement of soils to be used for the land raise at Parsonage Down east and the restoration of chalk grassland habitat.
 - e) Acoustic modelling for the acoustic / screen bunds and acoustic barriers should be provided to demonstrate the design is fit for purpose.
 - f) That the SoS considers appropriate conditions on any permission to secure the above-mentioned objectives to be discharged on liaison with Wiltshire Council at the appropriate point of the implementation process

Archaeology and WHS:

28. An Archaeological Mitigation Strategy will need to be agreed and its implementation secured by a condition / requirement attached to any grant of consent.

29. A CEMP that details the methods of protection for buried and upstanding archaeological remains during the construction process.
30. A requirement will be sought for the provision of a Community Benefit Fund or equivalent to help deliver heritage benefits of the proposed scheme.

Flood Risk and Drainage:

31. The application must comply with all Local planning policies and decisions on planning applications to major developments to ensure that sustainable drainage systems for the management of run-off are put in place. This will include:
 - a) Consult with Wiltshire Council as Lead Local Flood Authority (LLFA) on the management of surface water.
 - b) It is for HE to demonstrate that the proposed scheme does not increase the flood risk to others within the catchment.
 - c) Wiltshire Council must be able to satisfy themselves that the proposed minimum standards of operation are appropriate.
 - d) DCO requirements to ensure that there are clear arrangements in place for future and ongoing maintenance over the lifetime of the development (including maintenance of any attenuation ponds and flood defences) within the catchment.
 - e) DCO requirements to ensure appropriate arrangements are in place to deal with surface and ground water within the catchment.
 - f) Requirements may be required for all works within 8.0m of watercourses as Wiltshire Council byelaws.
 - g) The proposed development should include sustainable drainage system (SuDS) to ensure that the discharge from the site has been reduced.
 - h) Peak flow control (ensuring that peak flow from the developed site is minimised, to reduce flood risk downstream).
 - i) Volume control (ensuring that the total volume of runoff from the site is minimised, to reduce flood risk downstream).
 - j) Flood risk within the development (ensuring that flood risk to the development from off-site runoff and from the site drainage is mitigated).
 - k) Designing for maintenance considerations are within the design statement with frequency and methods.