

A303 Amesbury to Berwick Down

TR010025

6.3 Environmental Statement Appendices

Appendix 4.1 Scoping Opinion and
Chapter 1-4 Response Table

APFP Regulation 5(2)(a)

Planning Act 2008

Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009

October 2018



SCOPING OPINION:

Proposed A303 Stonehenge – Amesbury to Berwick Down

Case Reference: TR010025

Adopted by the Planning Inspectorate (on behalf of the Secretary of State for Communities and Local Government) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

November 2017

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1. INTRODUCTION

1.1 Background

- 1.1.1 On 23 October 2017, the Planning Inspectorate (the Inspectorate) on behalf of the Secretary of State (SoS) received a scoping request from Highways England (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed A303 Stonehenge – Amesbury to Berwick Down (the Proposed Development).
- 1.1.2 In accordance with Regulation 10 of the EIA Regulations, an Applicant may ask the SoS to state in writing its opinion *'as to the scope, and level of detail, of the information to be provided in the environmental statement'*.
- 1.1.3 This document is the Scoping Opinion (the Opinion) provided by the Inspectorate on behalf of the SoS in respect of the Proposed Development. It is made on the basis of the information provided in the Applicant's report entitled A303 Stonehenge – Amesbury to Berwick Down (the Scoping Report). This Opinion can only reflect the proposals as currently described by the Applicant. The Scoping Opinion should be read in conjunction with the Applicant's Scoping Report.
- 1.1.4 The Applicant has notified the SoS under Regulation 8(1)(b) of the EIA Regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development. Therefore, in accordance with Regulation 6(2)(a) of the EIA Regulations, the Proposed Development is EIA development.
- 1.1.5 Regulation 10(9) of the EIA Regulations requires that before adopting a scoping opinion the Inspectorate must take into account:
- (a) any information provided about the proposed development;*
 - (b) the specific characteristics of the development;*
 - (c) the likely significant effects of the development on the environment; and*
 - (d) in the case of a subsequent application, the environmental statement submitted with the original application.*
- 1.1.6 This Opinion has taken into account the requirements of the EIA Regulations as well as current best practice towards preparation of an ES.
- 1.1.7 The Inspectorate has consulted on the Applicant's Scoping Report and the responses received from the consultation bodies have been taken into account in adopting this Opinion (see Appendix 2).

- 1.1.8 The points addressed by the Applicant in the Scoping Report have been carefully considered and use has been made of professional judgement and experience in order to adopt this Opinion. It should be noted that when it comes to consider the ES, the Inspectorate will take account of relevant legislation and guidelines. The Inspectorate will not be precluded from requiring additional information if it is considered necessary in connection with the ES submitted with the application for a Development Consent Order (DCO).
- 1.1.9 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (eg on submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.
- 1.1.10 Regulation 10(3) of the EIA Regulations states that a request for a scoping opinion must include:
- (a) a plan sufficient to identify the land;*
 - (b) a description of the proposed development, including its location and technical capacity;*
 - (c) an explanation of the likely significant effects of the development on the environment; and*
 - (d) such other information or representations as the person making the request may wish to provide or make.*
- 1.1.11 The Inspectorate considers that this has been provided in the Scoping Report. The Inspectorate is satisfied that the Scoping Report encompasses the relevant aspects identified in the EIA Regulations.
- 1.1.12 In accordance with Regulation 14(3)(a) where a scoping opinion has been issued in accordance with Regulation 10, an ES accompanying an application for an order granting development consent should be based on *"the most recent scoping opinion adopted (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion)"*.
- 1.1.13 The Inspectorate notes the need to carry out an assessment under The Conservation of Habitats and Species Regulations 2010 (as amended)

(the Habitats Regulations)¹, as described at section 6.4 of the Scoping Report. This assessment must be co-ordinated with the EIA, to avoid duplication of information between assessments.

1.2 The Planning Inspectorate's Consultation

- 1.2.1 In accordance with Regulation 10(6) of the EIA Regulations the Inspectorate has consulted the consultation bodies before adopting a scoping opinion. A list of the consultation bodies formally consulted by the Inspectorate is provided at Appendix 1. The consultation bodies have been notified under Regulation 11(1)(a) of the duty imposed on them by Regulation 11(3) of the EIA Regulations to make information available to the Applicant relevant to the preparation of the ES. The Applicant should note that whilst the list can inform their consultation, it should not be relied upon for that purpose.
- 1.2.2 The list of respondents who replied within the statutory timeframe and whose comments have been taken into account in the preparation of this Opinion is provided, along with copies of their comments, at Appendix 2, to which the Applicant should refer in undertaking the EIA.
- 1.2.3 The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.
- 1.2.4 Any consultation responses received after the statutory deadline for receipt of comments will not be taken into account within this Opinion. Late responses will be forwarded to the Applicant and will be made available on the Inspectorate's website. The Applicant should also give due consideration to those comments in carrying out the EIA.

1.3 Article 50 of the Treaty on European Union

- 1.3.1 On 23 June 2016, the United Kingdom (UK) held a referendum and voted to leave the European Union (EU). On 29 March 2017 the Prime Minister triggered Article 50 of the Treaty on European Union, which commenced a two year period of negotiations regarding the UK's exit from the EU. There is no immediate change to legislation or policy affecting national infrastructure. Relevant EU Directives have been transposed into UK law and those are unchanged until amended by Parliament.

¹ The Conservation of Habitats and Species Regulations 2017 (S.I. 2017/1012) (consolidating the Conservation of Habitats and Species Regulations 2010 (S.I. 2010/490) with subsequent amending instruments), come into force on 30 November 2017.

2. THE PROPOSED DEVELOPMENT

2.1 Introduction

- 2.1.1 The following is a summary of the information on the Proposed Development and its site and surroundings prepared by the Applicant and included in their Scoping Report. The information has not been verified and it has been assumed that the information provided reflects the existing knowledge of the Proposed Development and the potential receptors/resources.

2.2 Description of the Proposed Development

- 2.2.1 The Applicant's description of the Proposed Development, its location and technical capacity (where relevant) is provided in section 2 of the Scoping Report with the main elements of the scheme summarised in section 2.4.
- 2.2.2 The Proposed Development is to create a new dual carriageway approximately 12.6km long which partly realigns a stretch of the existing A303 between Amesbury and Berwick Down, Wiltshire. The Proposed Development forms part of a wider package of proposals to improve connectivity between the south east and south west regions along the A303/A358 corridor. The Proposed Development extends from Yarnbury Castle at the western extent to Solstice Park, Amesbury at the eastern extent.
- 2.2.3 The Proposed Development will include a new section of dual carriageway constructed within a twin-bore tunnel past the Stonehenge monument, and within the Stonehenge, Avebury and Associated Sites World Heritage Site (WHS). The tunnelled section will be approximately 2.9km in length following an alignment broadly parallel with the existing A303 (ie past the Stonehenge monument) but approximately 50m to the south. The section of the existing A303 which currently passes through the WHS will be stopped up and replaced by a "*green byway*".
- 2.2.4 At the eastern and western extents of the tunnelled section (referred to as the Eastern and Western portals), above ground sections of dual carriageway are required within the WHS to connect to new junctions outside of the WHS at:
- Longbarrow junction (A303 / A360, c. 2km to the west of the western portal); and
 - Countess junction (A303 / A345 at Amesbury, c. 1.5 km to the east of the eastern portal).
- 2.2.5 A new section of dual carriageway is to be constructed to the west of the Longbarrow junction, bypassing Winterbourne Stoke and continuing west to Yarnbury Castle and Berwick Down. This bypass section will require a

new crossing of the River Till valley on a viaduct structure to the north of Winterbourne Stoke.

- 2.2.6 The Proposed Development will also create a “*High Load*” route for the A303 to allow for the restriction of above normal height vehicles using the new route within the bored tunnel. This route is explained at paragraph 2.4.17 of the Scoping Report and it would also be used as a diversionary route in the event of closure of the new tunnelled dual carriageway. The high load and diversionary routes utilise the existing road network, although the Applicant refers to further assessment being required in considering the need for any local junction upgrades, road widening and the like that may be required along these routes.
- 2.2.7 A plan showing the extent of the Proposed Development and its main components is provided at Figure 2.1 of the Scoping Report, and the length of the tunnelled section is also illustrated on Figure 6.4.
- 2.2.8 The existing A303 is flanked by the Salisbury plains grasslands and agricultural land. Residential, commercial and industrial buildings are found in the surrounding towns of Winterbourne Stoke in the west, Amesbury in the east and Larkhill and Durrington in the north. There are clusters of woodland sporadically spaced throughout the surrounding area. These features are shown on Figure 6.2 of the Scoping Report.
- 2.2.9 Figure 6.1A and 6.1B of the Scoping Report depict the locations of designated heritage features and non-designated heritage features respectively, including the delineation of the WHS as well as Registered Parks and Gardens, Conservation Areas, listed buildings and Scheduled Monuments in proximity to the Proposed Development.
- 2.2.10 Figures 6.2-6.4 depict landscape constraints including the Cranbourne Chase & West Wiltshire Downs Area of Outstanding Natural Beauty (AONB) within 5km of the Proposed Development. The Proposed Development site also lies within a (non-statutory) Special Landscape Area as designated within the Wiltshire Core Strategy.
- 2.2.11 Figures 6.5A and 6.5B depict key designated ecological features and Figure 6.7 depicts key ecological feature key in proximity of the Proposed Development including:
- The River Avon Special Area of Conservation (SAC) and River Avon System Site of Special Scientific Interest (SSSI) (crossed by the Proposed Development in two locations);
 - Salisbury Plain SAC and Special Protection Area (SPA) (adjacent to the Proposed Development site boundary at two locations);
 - River Till SSSI (crossed by the Proposed Development);
 - Parsonage Down SSSI and Yarnbury Castle (adjacent to the site boundary); and

- 14 no. county wildlife sites (CWS).

2.3 The Planning Inspectorate's Comments

Description of the Proposed Development

- 2.3.1 The Scoping Report provides an in depth description of the Proposed Development including the location of the main components. Section 2.4 of the Scoping Report divides the Proposed Development into “*Western*”, “*Central*” and “*Eastern*” sections and it would aid the reader if these definitions were more clearly defined on Figure 2.1 improving consistency with the written text.
- 2.3.2 The Applicant makes reference to areas of ongoing work in determining the design and approach to construction including, for example, the locations of material stockpiling areas, construction compounds and haul roads. Such areas should be defined, described and assessed as part of the ES and should be clearly labelled on accompanying figures. The Inspectorate notes the reference to satellite compounds potentially being “*in close proximity*” to the scheme footprint, and for clarity, expects that all such compounds are identified within the defined redline boundary and identified on the accompanying works plans and assessed as part of the ES. The assessment of relevant aspects should account for any flexibility around potentially multiple options sought by the Applicant for the location of such areas.
- 2.3.3 The Scoping Report provides a broad description of the key components of the Proposed Development. However, it does not provide specific information regarding details of the Proposed Development for example; the lengths of each road section, the anticipated depth of tunnel boring, the likely design specification for viaduct over the River Till or any detail around the size and extent of the portals at the eastern and western ends of tunnelled section. The ES should be clear in providing specific information on these points of design and ensure that the assessment is consistent with the specifications within the DCO. Equally, the ES should be specific in describing the existing roads that are to be stopped up, de-trunked or otherwise modified as a result of the Proposed Development, including those that are to be made into “*green byways*”. This information should also be depicted on figures in the ES to provide further clarity for the reader.
- 2.3.4 The ES should assess impacts associated with any temporary/permanent above ground structures particularly where they could be located within the WHS, for example ventilation shafts, access portals, bunds / other earthworks or tunnel service and/or control buildings.
- 2.3.5 The Scoping Report purposely omits any detailed description of the nature and quantity of the materials used and waste generated due to the fact they will be included in the later design development process. The ES should include these details as part of the description of the

Proposed Development and include justification of any key assumptions made. The ES should also assess any impacts associated and take into account opportunities to re-use of tunnel spoil as alluded to at paragraph 6.7.22 of the Scoping Report.

- 2.3.6 Paragraph 2.4.20 of the Scoping Report explains it is "*likely*" that a tunnel boring machine (TBM) would be used in the construction of the tunnelled section. Paragraph 6.7.22 of the Scoping Report also refers to uncertainty as to the type of tunnelling method to be used, although no specific references are made to any alternative tunnelling construction methods and the ES should account for any potential options that are being considered as part of the design of the Proposed Development. Section 3.3.2 states that "*Tunnel technology*" is being developed as part of the scheme design through autumn and winter 2017, but it is unclear if this relates to the methods of tunnelling or technology within the operational tunnel (or both).
- 2.3.7 The Applicant seeks to scope out any assessment of "*demolition after design life*" of the Proposed Development as part of the EIA given that "*It is considered highly unlikely that the proposed Scheme would be demolished after its design life*" (Paragraph 5.4.3 of the Scoping Report). The Inspectorate interprets this reference to be akin to "decommissioning" of the Proposed Development.
- 2.3.8 The Inspectorate considers that this is a reasonable approach taking into account the specific characteristics of the Proposed Development. However, the Inspectorate considers that any decommissioning associated with dismantling and replacing particular elements of the Proposed Development (e.g. lighting columns) once they reach the end of their design life should be assessed if significant effects are likely to occur (and the design life should be specifically defined).
- 2.3.9 Section 3.3.2 of the Scoping Report makes reference to elements of the design including "*Enhancement and compensation areas*". The Inspectorate notes reference to these terms being included as part of a "*mitigation hierarchy*" in paragraph 5.4.15 of the Scoping Report. Further comments on these points are considered in section 4 of this Scoping Opinion (as applicable). The Inspectorate expects the description of such areas to be clearly distinguishable by type, that which is compensation and that which is enhancement. The ES should explain the extent to which these areas are relied upon in determining the likely significant environmental effects and how any such measures would be secured and delivered.

Alternatives

- 2.3.10 The EIA Regulations require that the Applicant provide 'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an

indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects’.

- 2.3.11 Section 3.2, Figure 3.1 and Table 3.1 of the Scoping Report describe the process of options identification undertaken by the Applicant to date, including consideration of 60 route options grouped into seven separate route corridors.
- 2.3.12 The ES should include a discrete section that provides details of the alternatives considered and the reasons leading to the chosen option(s), including a comparison of the environmental effects.

Flexibility

- 2.3.13 The Inspectorate’s Advice Note 9 Using the Rochdale Envelope² provides additional details on the recommended approach. The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different Proposed Development. The development parameters will need to be clearly defined in the draft DCO (dDCO) and therefore in the accompanying ES. It is a point for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.
- 2.3.14 It should be noted that if the Proposed Development changes substantially during the EIA process and prior to submission of the application the Applicant may wish to consider requesting a new scoping opinion.

² Advice Note nine: Rochdale Envelope. Available from:
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

3. EIA APPROACH

3.1 Introduction

- 3.1.1 This section contains the Inspectorate's specific comments on the scope, and level of detail of information to be provided in the Applicant's ES. General advice on the presentation of an ES is provided in the Inspectorate's Advice Note 7 'Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping'³ and associated appendices.
- 3.1.2 Aspects are not scoped out unless specifically addressed and justified by the Applicant, and confirmed as being scoped out by the Inspectorate. The ES should be based on the Scoping Opinion in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report. The Inspectorate has set out in this Opinion where it has/has not agreed to scope out certain aspects or matters on the basis of the information available at this time. The Inspectorate is content that this should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such aspects/matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 3.1.3 Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/minimise adverse effects is secured through DCO requirements (or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

3.2 Relevant National Policy Statements (NPSs)

- 3.2.1 Sector-specific NPSs are produced by the relevant Government Departments and set out national policy for NSIPs. They provide the framework within which the Examining Authority (ExA) will make their recommendations to the SoS and include the Government's objectives for the development of NSIPs. The NPSs may include environmental requirements for NSIPs, which Applicants should address within their ES.
- 3.2.2 The designated NPS relevant to the National Networks sector is the National Networks NPS (NPSNN).

³ Advice Note seven: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping. Available from:
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

3.3 Scope of Assessment

General

- 3.3.1 The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables:
- To demonstrate how the assessment has taken account of this Opinion;
 - To identify and collate the residual effects after mitigation for each of the specialist aspect chapters, including matters relevant to interrelationships and cumulative effects;
 - To set out the proposed mitigation and/or monitoring measures including cross-reference to the means of securing such measures (eg a dDCO requirement);
 - To describe any remedial measures that are identified as being necessary following monitoring; and
 - To identify where details in the HRA report (where relevant), such as descriptions of European sites and their locations, together with any mitigation or compensation measures, are to be found in the ES.
- 3.3.2 The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.
- 3.3.3 The Inspectorate considers that where a DCO application includes works described as 'associated development', that could themselves be defined as an improvement of a highway, the Applicant should ensure that the ES accompanying that application distinguishes between; effects that primarily derive from the integral works which form the proposed (or part of the proposed) NSIP and those that primarily derive from the works described as associated development, for example through a suitably compiled summary table. This will have the benefit of giving greater confidence to the Inspectorate that what is proposed is not in fact an additional NSIP defined in accordance with s22 of the PA2008.
- 3.3.4 Section 5 of the Scoping Report outlines the general approach to the proposed assessment as being in accordance with the Design Manual for Roads and Bridges (DMRB) and accompanying Interim Advice Notes (IANs).
- 3.3.5 The ES should clearly demonstrate that impacts as a result of the whole development have been assessed. For example, the DCO may provide for works on diversionary routes and high load routes and the ES will need to assess the anticipated volumes of traffic and its management including frequencies of expected use of these routes.

- 3.3.6 The description of the Proposed Development includes the retention of the current A303 for local traffic to some extent. The proposed approach to the ES does not appear to set out specific assessment of the impact of the two roads being in use simultaneously, or the spatial / temporal extent of the retained A303. This assessment will be required in the ES.

Baseline Scenario

- 3.3.7 The ES should include a description of the baseline scenario with and without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.
- 3.3.8 The ES should provide a clear description of the baseline particularly in respect of the existing road network that is to be affected. This is essential to the accurate assessment of the Proposed Development's effects, particularly in respect of roads that are to be stopped up, de-trunked and / or made into "*green byways*".

Forecasting methods or evidence

- 3.3.9 The ES should contain the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each technical chapter.
- 3.3.10 The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the EIA, which clearly states which effects are 'significant' and 'non-significant' for the purposes of the EIA.

Residues and emissions

- 3.3.11 The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the aspect assessments.

Mitigation

- 3.3.12 Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured ideally with reference to specific DCO requirements or other legally binding agreements.

Vulnerability of the development to risks of major accidents and/or disasters

- 3.3.13 The ES should include a description of the potential vulnerability of the Proposed Development to risks of major accidents and/or disasters, including the vulnerability to climate change, which are relevant to the Proposed Development. Relevant information available and obtained through risk assessments pursuant to European Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.
- 3.3.14 Section 5.7 of the Scoping Report sets out how the Applicant intends to approach the assessment of major accidents in the ES. This includes reference to a document entitled Major Projects Instructions guidance document (reference MPI-57-052017). The Inspectorate has not been able to locate this document and it does not appear to be readily available. The ES should clearly explain the assessment methodology, if specific guidance documents are relied upon and are necessary to understand the approach taken, they should be readily available or provided with the ES.
- 3.3.15 The Scoping Report states that the assessment will consider vulnerability of the project to risks of major accidents and/or disasters following a 3-staged process outlined in paragraph 5.7.6. Table 5.5 presents consideration of major events (inclusive of accidents and disasters) that have been shortlisted for further consideration. For the avoidance of doubt, and although not specifically cited at paragraph 5.7.3 of the Scoping Report, the Applicant should assess the potential for significant effects (during construction and operation) of major accidents and disasters that:
- (1) Could result in impacts upon the Proposed Development (eg wildfires, flooding); or
 - (2) Could occur as a consequence of the Proposed Development (eg tunnel failure / collapse).
- 3.3.16 The Inspectorate recognises, and is generally satisfied that the Applicant's approach (Table 5.5 of the Scoping Report) is inclusive of both types.
- 3.3.17 The Scoping Report explains that the assessment of major accidents and disasters will be presented in relevant ES aspect chapters and concludes that, "*it is highly likely*" the events identified in Table 5.5 will influence the design such that there is no real risk of a likely significant effect occurring. However, the Inspectorate considers the ES should include an

assessment of the likely significant effects to the environment for each relevant 'event' identified in Table 5.5.

- 3.3.18 The ES should also assess major accidents and disasters including the potential for tunnel closures taking into account the likely frequency of occurrence during operation, and the need to use the identified diversionary routes.

Transboundary effects

- 3.3.19 Schedule 4 part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The Inspectorate notes that the Applicant has/has not indicated in the Scoping Report whether the Proposed Development is likely to have significant impacts on another European Economic Area (EEA) State.
- 3.3.20 Regulation 32 of the EIA Regulations inter alia requires the Inspectorate to publicise a DCO application on behalf of the SoS if it is of the view that the proposal is likely to have significant effects on the environment of another EEA state, and where relevant, to consult with the EEA state affected.
- 3.3.21 Appendix A of the Scoping Report presents the Applicant's screening matrix for the consideration of "*Possible Substantial Effects on the Environment of another EEA State*" citing EIA Regulation 32 and the Inspectorate's AN12. The Inspectorate expects the ES to specifically identify whether, in the view of the Applicant, the Proposed Development has the potential for significant transboundary effects and if so, what these are and which EEA States would be affected.

A reference list

- 3.3.22 A reference list detailing the sources used for the descriptions and assessments must be included in the ES.

3.4 Confidential Information

- 3.4.1 In some circumstances it will be appropriate for information to be kept confidential. In particular, this may relate to information about the presence and locations of rare or sensitive species such as badgers, rare birds and plants where disturbance, damage, persecution or commercial exploitation may result from publication of the information. Where documents are intended to remain confidential the Applicant should provide these as separate paper and electronic documents with their confidential nature clearly indicated in the title, and watermarked as such on each page. The information should not be incorporated within other documents that are intended for publication or which the Inspectorate would be required to disclose under the Environmental Information Regulations 2014.

4. ASPECT BASED SCOPING TABLES

4.1 Air Quality

(Scoping Report section 6.1)

The local air quality study area will use a criteria based approach which is set out in the Scoping Report. It will be based on links within the Affected Road Network which have relevant receptors within 200m of either side of road carriageways. All road links within 200m of these relevant receptors will then be included in the air quality assessment and this area forms the overall study area. Air quality impacts within 200m around the construction boundary and construction compounds will be considered.

The Proposed Development would be assessed in accordance with the guidance outlined in DMRB HA207/07 Volume 11, Section 3, Part 1; associated Interim Advice Notes (IANs) and Defra's Local Air Quality Management Technical Guidance (LAQM.TG (16)).

The Applicant identifies that the Proposed Development has potential to give rise to air quality effects during construction and operation. Potential impacts during construction are identified as dust from construction activities, emissions from no road mobile machinery, changes in traffic flows as a result of temporary traffic measures and transportation of materials.

During the operational phase, there is potential for positive or negative changes due to vehicle flows, speeds and composition and changes in air quality due to distances from source emissions and receptors.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	6.1.29	Likely significant effects from carbon monoxide, 1, 3-butadiene, benzene, lead and sulphur dioxide	The Scoping Report states that these pollutants will not be considered further as national assessments have demonstrated that there is no risk of them exceeding the relevant UK Air Quality Strategy (AQS) objectives due to emissions from traffic anywhere in the UK. Whilst the Applicant has not specifically sought to scope out these matters, the Inspectorate agrees with the Applicant's reasoning and that further consideration of these pollutants can be scoped out of further assessment.
2	6.1.54	Dispersion modelling at the tunnel portals	The Inspectorate does not consider that sufficient information has been provided to agree to scope this matter out. In particular the Inspectorate is concerned that

			<p>supporting information is missing such as:</p> <ul style="list-style-type: none"> • the anticipated concentration of pollutants within the operational tunnel; • details relating to the proposed ventilation strategy and other relevant elements of design; and • evidence to demonstrate there is no potential overlap between emissions released from the portal(s) and emissions along the road network particularly at nearby junctions. <p>On this basis, the Inspectorate does not agree that this matter can be scoped out of the assessment.</p>
ID	Para	Other points	Inspectorate's comments
3	6.1.3 – 6.1.10	Study Area	<p>In the Applicant's definition of local and regional study areas, there is reference to the "<i>affected road network</i>" criteria and relevant receptors within 200m thereof.</p> <p>For the avoidance of doubt, the Inspectorate will expect to see an assessment of effects to both human and ecological receptors in the definition of these study areas.</p>
4	6.1.18	Baseline	<p>The Scoping Report states that there are no links exceeding 40µg/m³ NO₂ present within 6.2 miles (10km) of the A303 Stonehenge in the scheme opening year. The ES should explain why a distance of 10km has been used to determine impacts from road contributed concentrations of pollutants with reference to the definition of affected roads.</p>
5	6.1.21	Baseline	<p>The definition of baseline conditions should take into account the defined HGV and construction traffic routes, the main and satellite construction compound locations and the high load and diversionary routes.</p>
6	6.1.22	Baseline - monitoring	<p>No air quality monitoring has been undertaken within the area administered by North Dorset District Council since 2009.</p>

			The assessment in the ES should be undertaken on the basis of a relevant and up to date data set to establish the baseline conditions and the extent of any likely change within the study area.
7	6.1.33	Impacts and mitigation	<p>Construction dust and emissions are identified in the Scoping Report as a having 'temporary' impacts to human health and that these will be managed by the application of standard mitigation measures.</p> <p>The impacts to human health from construction dust (including the duration) should be assessed and reported in the ES. The effectiveness of mitigation measures in reducing the significance of effects should be documented in the ES.</p>
8	6.1.33 and 6.1.49	Impacts from dust on lichens community	<p>Paragraph 6.1.49 of the Scoping Report makes reference to "<i>unique assemblages</i>" of lichen at Stonehenge "<i>that add to the character of the WHS</i>".</p> <p>On this basis, the ES should fully assess the potential impacts from construction dust on all sensitive receptors, including the lichens found at the Stonehenge monument and the effect to the character of the WHS. The matter should also be addressed as part of the archaeology and cultural heritage assessment.</p>
9	NA	Monitoring	<p>It is unclear what the arrangements for on-going air quality monitoring will be during long term operation of the Proposed Development.</p> <p>The ES should clearly explain the need for, and scope of, long term air quality monitoring proposals and any agreement with key stakeholders in this regard.</p>
10	6.1.40 and Table 6.4	Assessment Methodology	<p>No reference is made to the need for PM_{2.5} to be considered as specific pollutant within the assessment.</p> <p>The Inspectorate considers that the ES should include an assessment of impacts associated with increased PM_{2.5} resulting from the Proposed Development. In</p>

			determining significance the assessment should take into account performance against relevant target/limit values.
11	6.1.45	Methodology and identification of receptors.	Stonehenge as a visitor attraction is not identified in the Scoping Report as a sensitive receptor. The ES should explain how the defined sensitivity of Stonehenge is determined in relation to other identified sensitive receptors (eg housing, schools, and hospitals).
12	6.1.50	Assessment of impacts	Three designated sites (River Avon System SSSI, Stockton Wood and Down SSSI and River Test SSSI) are identified where the critical level for NO _x for the protection of vegetation (30µg/m ³) is likely to be exceeded. The ES should assess the impacts to identified designated sites from the Proposed Development alone and cumulatively with other development. Any specific mitigation measures required to address the effect on these sites from NO _x should be clearly identified and secured.

4.2 Cultural Heritage

(Scoping Report section 6.2)

The Scoping Report confirms that the study area for cultural heritage assets will extend to a distance of 500m from the proposed DCO site boundary. A flexible approach will be taken to the identification of high-value assets on which there may be an impact upon setting, up to 2km beyond the proposed DCO site boundary.

The Scoping Report also outlines the methodology to be applied to the assessment and Paragraph 6.2.7 lists relevant industry guidance from Historic England and Stonehenge, Avebury and Associated Sites World Heritage Site Management Plan.

The Scoping Report identifies the Proposed Development as having potential to give rise to effects on cultural heritage during construction and operation from a range of sources. Potential impacts during construction are identified as partial or total removal of heritage assets and compaction of archaeological deposits by construction traffic and structures. Furthermore, both beneficial and adverse effects on the setting of heritage assets including changes to visual intrusion, noise, air quality, severance, access and amenity as a result of the realignment of the A303, undergrounding of the road and other construction works are noted.

Potential impacts during operation are identified as both beneficial and adverse effects to the surroundings of certain heritage assets or the general character of their setting; and changes to access to, or the management or viability of, heritage assets.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
	N/A	N/A	No matters are proposed to be scoped out from the assessment of cultural heritage.
ID	Para	Other points	Inspectorate's comments
1	6.2.2	Methodology – Heritage Impact Assessment	The Scoping Report states that as well as a detailed assessment of impacts, a separate Heritage Impact Assessment (HIA) Scoping Report in accordance with ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties will be prepared to address scope of works on the HIA on the Outstanding Universal Value (OUV) of the Stonehenge, Avebury and Associated Sites WHS. This assessment is to be provided as an appendix to the ES. The ES should include a detailed

			<p>assessment of the likely impacts to cultural heritage features including those of international significance. The ES should integrate with the HIA avoiding duplication and overreliance on the standalone appendix (though a standalone HIA technical appendix should also be provided as it is being prepared in accordance with the specific ICOMOS guidance).</p> <p>The ES should explain the relationship between the ES assessment and the HIA methodology and its findings.</p>
2	6.2.2	Methodology – Heritage Impact Assessment	<p>The HIA and ES assessments should also be framed in the context of the Stonehenge, Avebury and Associated Sites WHS Management Plan 2015.</p>
3	6.2.5	Study Area	<p>The study area for cultural heritage assets will extend 500m from the proposed DCO boundary. The Zone of Theoretical Visibility (ZTV) will be used to guide identification of sites, up to 2km beyond the DCO site boundary. The relationships between study areas defined for the purposes of the ES and HIA to consider OUV should be explained as it is unclear whether the study areas defined in section 6.2.5 applies to both the ICOMOS and DMRB assessments.</p> <p>Given that the DCO boundary extends outside of the WHS, the HIA should demonstrate how it has considered the effects of the Proposed Development beyond the WHS boundaries as appropriate.</p>
4	6.2.5	Study Area	<p>Paragraph 6.2.5 states that a flexible approach will be taken to the identification of high-value assets. The Inspectorate requires that assets of lower value than 'high', but whose setting may be affected by the Proposed Development, are also given due regard as part of the assessment.</p>

5	6.2.15	The Proposed Development's potential to affect heritage assets	The Inspectorate expects that undesignated heritage assets will be relevant to the OUV of the WHS. These should be reflected and their value appropriately assessed within the ES to determine if there is a likely significant effect.
6	6.2.21	Mitigation	<p>The ES should describe in detail both inbuilt mitigation and any specific measures designed to address significant effects.</p> <p>The Inspectorate will expect to see details of the proposed archaeological investigation mitigation strategy investigation and agreement as to the scope and intended outcomes of these mitigation works having been agreed with the Heritage Monitoring and Advisory Group (HMAG). Appropriate cross referencing must be made between specific impacts on heritage features identified in the ES and the accompanying mitigation strategies along with clear presentation of the effects and residual effects such that the reliance being placed on the mitigation can be understood.</p>
7	6.2.27 and 6.2.39	Assessment of Significance (Value)	The assessment of known and potential buried archaeological resources as well as historic landscape character should explain how value is determined. The ES should explain how this determination relates to each asset and to what extent setting influences value.
8	Table 6.5	Assessing the Value of Historic Building Assets, Archaeology and Historic Landscape (HA 208/2007)	The value attributed to a heritage asset should be explained in the context of relevant legislation and policy. The National Planning Policy Framework (NPPF) and NPSNN state that Scheduled Monuments and Grade I and II* Listed Buildings are heritage assets of the highest significance. The ES assessment methodology should take this into account in establishing the value of assets and should not be limited by the approach set out in DMRB. In particular the Inspectorate considers that the value criteria presented in Table 6.5 should be amended to better reflect the value of assets such as the OUV.

9	6.2.39	Assessment of setting	The Scoping Report explains the likely impacts of setting upon heritage assets. The scope, methodology and findings of the baseline setting assessment should be reported in the ES. This should also be integrated with the setting assessment in the HIA for the OUV.
10	6.2.52	Archaeological Evaluation Strategy	<p>Reference is made to “<i>Separate Archaeological Evaluation Strategy and appropriate Written Schemes of Investigation (WSIs)</i>”. The Inspectorate expects that an Overarching WSI is prepared to set out the area-specific WSIs as part of the overall archaeological evaluation strategy.</p> <p>The Inspectorate expects the Applicant to engage with and reference the Wiltshire Archaeology Service alongside HMAG in respect of agreement of archaeological evaluation strategies.</p>
11	6.2.55 to 6.2.56	Limitations regarding surveys and site access	<p>The Scoping Report indicates that trial trenching and geophysical surveys necessary to the assessment need expanding and/or revisiting.</p> <p>The ES should be based on up to date and relevant information. Limitations to the assessment should be avoided where possible. If they are unavoidable the assessment should explain the assumptions that have been made to assess likely significant effects including any worst case assumptions relating to the presence, value and sensitivity of features in the survey area.</p>

4.3 Landscape and Visual

(Scoping Report section 6.3)

The study area is defined as 5km from the proposed centreline and a more detailed study area of 2km. These are set out on Figures 6.2 and 6.3. The Scoping Report notes that the final study area will be informed by computer generated Zone of Theoretical Visibility (ZTV).

The assessment methodology is based upon Highway England's IAN135/10 and Guidelines for Landscape and Visual Impact Assessment 3rd edition (GLVIA3). Table 6.13 sets out the determination of significance of effect by combining magnitude of the impact with the sensitivity of the receptor. The section however does not set out which levels of significance are determined to be significant in EIA terms.

Potential impacts are set out in terms of construction and operation. These include loss of land and other landscape features during construction which may also be permanent, substantial cut and fill works, adverse visual impacts on residential receptors, users of recreational facilities and public rights of way (PRoW) and paragraph 6.3.56 of the Scoping Report sets out a number of construction activities likely to have impacts.

During operation, potential beneficial impacts include the closing of the A303 through the WHS. This change is also likely to be beneficial to visitors, recreational users of land, permissive paths and PRoW. Potential adverse impacts are associated with construction of the highway including the tunnel portals, bridges and grade separation junctions, vehicular movements, lighting, gantries and signage.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	6.3.14	Townscape of Amesbury, Durrington and Bulford	<p>Paragraph 6.3.1 of the Scoping Report states that, for the purposes of the report <i>"the term 'landscape' is synonymous with both rural landscapes and urban landscapes or townscapes"</i>, and that Amesbury, Durrington and Bulford are proposed to be scoped out of the assessment.</p> <p>The Inspectorate refers to the ZTV presented in Figure 6.2 of the Scoping Report which relates only to traffic along the A303, and does not consider other activities associated with the Proposed Development, for example the High Load Routes, Countess Junction and other areas of land take within the DCO site boundary in and around Amesbury, Bulford and</p>

			Ratfyn. In this respect, the Inspectorate does not agree that consideration of temporary (during construction) and permanent landscape effects at these locations can be scoped out on the basis of the justification provided as paragraph 6.3.14.
	Para	Other points	Inspectorate's comments
2	6.3.8 – 6.3.9	Study Area	The Scoping Report notes that theoretical visibility will be " <i>verified by site visit</i> ". The ES should clearly explain the approach in this regard including the timing of any such site visit and how/if professional judgement has been applied.
3	6.3.8	Study Area	The Scoping Report does not explain how the 5km and 2km study areas have been determined appropriate. The Scoping Report appears to conclude that significant effects beyond these distances are not likely to occur. However, this approach lacks appropriate justification. The Inspectorate considers that visual impacts could occur at an extent beyond 5km from the Proposed Development.
4	Figure 6.3	Identification of viewpoints	<p>The ES should include an assessment which identifies the exact locations of viewpoints which are proposed from outside the 5km study area.</p> <p>The Inspectorate requires specific consideration of long-distance views from the Cranbourne Chase AONB.</p>
5	Figure 6.3	Identification of viewpoints	<p>The Inspectorate requires specific prominence to be paid in the LVIA to the potential for temporary and / or permanent features within the WHS.</p> <p>The assessment should take into account the location of temporary construction compounds, material storage areas and other associated works, in terms of landscape and visual impacts, and their potential effects at the identified viewpoints.</p>

6	6.3.69	Guidance and Standards	<p>The Scoping Report notes that <i>"The guidance is not prescriptive and therefore a tailored approach is required which is flexible and recognises the importance of professional judgement"</i>.</p> <p>Noting the above, the Applicant should clearly present and justify their assessment method(s) in the ES, explaining how IAN 135/10 and the GLVIA3 have both been used to inform the impact assessment. It should be confirmed where professional judgement has been utilised in the assessment.</p> <p>In accordance with the NPSNN, the Applicant should set out within the ES the proposed measures to minimise adverse landscape and visual effects from construction and operational activities, with particular reference to design (including choice of materials) and landscaping schemes.</p>
7	6.3.71 and 6.3.73	Mitigation measures for landscape and visual effects	<p>The assessment in the ES should describe the likely significant effects both prior to mitigation and residually so that it is possible to understand the efficacy of the mitigation proposed. Where mitigation measures are inherent as part of the design, these should be clearly set out in the description of the Proposed Development and cross referred to in the LVIA.</p>

4.4 Biodiversity

(Scoping Report section 6.4)

The study area is based on a Zone of Influence (ZoI) determined by the likely ecological impacts from the Proposed Development. Designated sites to be included in the study area are determined by distance relevant to the particular type of designated site in question. This approach is set out in paragraph 6.4.4.

The Scoping Report states that the methodology will follow HE IAN 130/10 (detailed assessment) and Guidance on Ecological Assessment (CIEEM).

The Scoping Report sets out that there is potential for indirect impacts on the River Avon SAC (and River Till SSSI which is part of the SAC). Further indirect impacts are possible after construction as a result of disturbance events such as pollution, siltation from water run-off and noise/vibration.

The Scoping Report also notes the potential for indirect impacts on the Salisbury Plain SAC and SPA in two areas, Parsonage Down SSSI and National Nature Reserve (NNR) and Yarnbury Castle SSSI. This is predominantly through air pollution.

There is potential for direct impacts on of six county designated CWSs and indirect impacts on a further eight. There is also potential for indirect impacts on disturbance of birds at Normanton Down RSPB reserve.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	6.4.29	Reptiles (other than habitat appraisal)	The Scoping Report does not include information explaining why/how likely significant effects to reptile species would be avoided. In absence of this information the Inspectorate considers that if suitable Reptile habitat is found to be present within the study area then targeted surveys should be undertaken to confirm presence/absence to establish the potential for significant effects occurring.
2	6.4.29	Wintering birds	The Scoping Report does not explain how or why significant effects to wintering birds are not predicted. In absence of this information the Inspectorate considers that the need for wintering bird surveys should be discussed and agreed with Natural England. If wintering bird surveys are required they should be undertaken in accordance with recognised good practice and at the appropriate times of year.

	Para	Other points	Inspectorate's comments
3	6.4.4	Study Area	<p>The Scoping Report does not clearly identify how the study area will be identified. Paragraph 6.4.4 sets out the parameters for the desk based assessment. Paragraph 6.4.5 sets out that a ZVI will be identified. It then goes on to state that the parameters in paragraph 6.4.4 are maximum parameters for the study area. Paragraph 6.4.26 sets these out as the minimum parameters. It is therefore unclear as to how the ZVI influences the study area.</p> <p>The study area in respect of designated sites should be determined on the basis of the extent of the likely impacts (ZoI) rather than arbitrary distances which may result in sites being omitted from consideration in the assessment.</p> <p>In particular, the Inspectorate considers a 100m ZoI around the land required for construction to be too narrow for the assessment of effects on terrestrial habitats considering the nature of construction activities. It is noted that the air quality assessment will consider receptors within 200m as part of the assessment of construction effects. Further evidence should be provided as to the potential effect beyond this ZoI.</p>
4	6.4.5	Study Area	<p>The study area should be further defined through appropriate on site survey techniques including additional phase 1 habitat survey(s) if necessary, as the Inspectorate notes the current extent of such surveys appears to be limited to those undertaken from PRow.</p> <p>The Applicant should set out in the ES, a justification as to how this approach has ensured that the study area includes all potential impacts.</p>
5	6.4.18	Potential impacts and mitigation	<p>Specific reference should be made to the consideration of noise and vibration effects on ecological receptors associated with the TBM during construction and the long term</p>

			operation of the bored tunnel.
6	6.4.18	Potential impacts and mitigation	Reference is only made to noise and vibration effects on the River Avon SAC at paragraph 6.4.18 and the Inspectorate requires the potential for noise to disturb fish and other species experienced from the proposed works (eg piling), to be assessed and not just those associated with the SAC.
7	6.4.35	Assessment methodology	The ES should include a clear description of the assessment method(s) including the approach to determining significance and explain how IAN 130/10 and the CIEEM guidance have both been used. It should be confirm if/where professional judgement has been used.
8	6.4.28 and table 6.15	Baseline surveys	The Inspectorate recommends that the scope of targeted species surveys are discussed and agreed with relevant statutory bodies to ensure comprehensive coverage. The ES should include a description of reasons for the targeted surveys required and should confirm the survey dates and duration as well as spatial scope.
9	6.4.33	Habitats Regulations Assessment	The HRA must be co-ordinated with the EIA, to avoid duplication of information between assessments.

4.5 Noise and Vibration

(Scoping Report section 6.5)

The study area for the construction phase is focussed "*on the closest identified receptors*". The study area for operational noise follows guidance in DMRB Volume 11, Section 3, Part 7, HD 213/11 Revision 1 (Ref 129). The study area will also include minor works to existing roads "*outside the scheme extents on the A303*".

The methodology for undertaking a quantitative assessment of construction noise is to be carried out in line with BS 5228: 2009+A1: 2014 'Code of Practice for Noise and Vibration Control on Construction. Reference is also made to the NPPF and Noise Policy Statement England (NPSE). DMRB is relied upon for the methodology for determining operational impacts. A detailed assessment is to be undertaken. The Scoping Report sets out how significance of effect is determined and which values are determined to be significant in EIA terms.

The Scoping Report does not set out any specific impacts but identifies the range of impacts from a scheme of this type and size.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	6.5.27	Noise assessment of the operation of the diversion route	<p>The ES should ensure that the worst case scenario is assessed and as such, the Inspectorate considers that the diversion and high load routes should be included in the assessment as at present there is no information provided to suggest the frequency or durations of use.</p> <p>There is also no quantification of the level of use of the 'high load' route so as to demonstrate the noise impacts of the Proposed Development need not be considered.</p>
2	6.5.74	Operational ground borne vibration	<p>The Inspectorate notes that the Applicant wishes to scope out the assessment of operational ground borne vibration as such vibration only occurs on unmaintained road surfaces.</p> <p>The Inspectorate agrees that this matter can be scoped out of the ES in relation to the realigned and tunnelled sections of the A303. However, the Inspectorate does not agree that significant effects with regard to operational vibration effects along the</p>

			<p>diversion and high load routes can be ruled out on the basis of the information provided. Therefore, these matters should be assessed as part of the ES.</p> <p>The ES should also explain the anticipated maintenance schedule for all routes and how this is to be delivered as part of the DCO.</p>
	Para	Other points	Inspectorate's comments
3	6.5.5	Study Area	<p>The Scoping Report states the study area will "<i>focus on the closest identified receptors</i>" however it does not explain how such receptors will be determined.</p> <p>There is no clear evidence as to how the locations of sensitive receptors and extent of likely impacts have been taken into account in determining the study area.</p> <p>The ES should clearly explain the methodology along with the identification of the receptors and study areas, ensuring that a robust assessment of likely significant effects is carried out. The Applicant should seek to obtain agreement of the methodology with the LPA as stated in DMRB. The ES should clearly define receptors selected as being 'representative' of larger groups.</p>
4	6.5.18	Baseline	<p>The Scoping Report sets out that a selection of locations will be used to determine the baseline levels of noise. The Applicant should agree these locations with the relevant local authority. The ES should explain and depict the locations of baseline noise monitoring locations.</p> <p>The Scoping Report makes no indication of the timeframe over which baseline surveys will take place or at what times of the year.</p> <p>The approach to establishing the baseline noise environment should be discussed and agreed with the relevant local authority. This should include the locations of the monitoring points, the time periods covered and other relevant factors such as weather conditions which should also be explained</p>

			in the ES.
5	N/A	Methodology	<p>The noise assessment is required, as set out in the NPSNN, to take into account ecological receptors as well as human. As such, consideration should be given to findings of the biodiversity and ecological surveys in terms of identifying sensitive receptors. NE should be consulted in relation to the assessment on designated nature conservation sites, protected landscapes, protected species or other wildlife.</p> <p>Inter-relationships with other aspects should be considered - for example, noise impacts on the setting of heritage assets.</p>
6	N/A	Working Hours	<p>The Scoping Report does not reference the working hours which are proposed, particularly in relation to the TBM.</p> <p>The ES should set out the working hours that have been assessed as part of each component of the Proposed Development and they should be consistent with what is permitted in/by the DCO should it be granted.</p>
7	N/A	Monitoring	<p>The Scoping Report at present does not reference monitoring of noise levels during construction or operation to ensure the appropriateness of mitigation. The need for and scope of monitoring during construction and operation of the Proposed Development should be presented in the ES.</p>
8	6.5.69	Operational vibration assessment	<p>The Scoping Report confirms that the assessment will consider vibration effects on properties within 40m of the preferred route. The Inspectorate considers that the assessment should extent to all roads that are affected by the Proposed Development and likely to result in significant effects. In particular this should account for the diversion and high load routes.</p>

4.6 Geology and Soils

(Scoping Report section 6.6)

The study area for the geological surveys is defined as being a 250m radial zone around the Proposed Development. A study area of 1km has been used to assess groundwater, surface water and potable water abstraction and for the remainder of the aspect, the study area comprises the working area of the Proposed Development. The de-watering study area includes a 5km radial zone around the Proposed Development; however this study area is likely to be refined based on future ground water investigations.

The geology will be assessed using published and existing information from historical investigations and assessments reports, including the 2017 Structural Soils Investigations. The land contamination methodology will be assessed in accordance with the Environment Agency Contaminated Land Report CLR11 and takes the form of a 3 tiered risk-based approach. The impact assessment methodology is based on the National House Building Council (NHBC) and Environment Agency report R&D66 risk assessment approach.

Potential impacts for geology are based on the uncertainties of the materials' engineering properties, its leachate potential and its potential to increase radon concentration.

Potential impacts are set out in terms of construction and operational effects. These include introducing new sources and mobilising contaminants into the surrounding environment as well as creating new contamination paths below ground.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	6.6.15	Local Geological Sites (LGS)	The Inspectorate agrees that an assessment of effects on LGS and can be scoped out on the basis that there are none located within the study area or surroundings.
2	6.6.16	Mineral Safeguarding Area (MSA)	The Inspectorate agrees that an assessment of effects on MSAs can be scoped out due to none being located within the study area.
3	6.6.40	Structural/ Engineering Geology	The Inspectorate does not agree that structural/engineering geology should be scoped out of the assessment. The Inspectorate notes the proposal of an additional structural/ engineering geology report; however, it is unclear how this report addresses the issues identified in

			<p>paragraphs 6.6.33 -6.6.35, which appear to go beyond the scope of that assessment.</p> <p>The Inspectorate considers that the ES should assess the impacts applicable to the presence of phosphatic chalk. The ES should also include an assessment of the related options (if they are necessary) and explain where uncertainties exist or are addressed.</p>
	Para	Other points	Inspectorate's comments
4	6.6.3	Study Area	<p>The ES should explain and justify the chosen study areas for each of the strands of assessment as outlined in paragraph 6.6.3.</p> <p>Whilst paragraph 6.6.2 notes that Volume 11 of DMRB has been used in the preparation of the assessment method for this aspect; it is not stated as to whether the study area is derived from such guidance.</p>
5	6.6.14	Natural Ground Hazards	<p>To enable clear understanding of impacts, the ES should include figures to depict (visually) the geographic locations of the varying risks of landslides and compressibility across the study area. This information will aid the understanding of risks which the Scoping Report identifies as varying from negligible to high.</p>
6	6.6.21	Esso Oil Pipeline	<p>The Scoping Report notes that mitigation requirements are needed to prevent interaction with the Esso Oil Pipeline. The mitigation measures referred to are not specifically defined. These mitigation measures should be clearly set out in the ES along with consideration of how they are proposed to be secured as part of the design. The ES should also consider the potential for existing contamination in and around the area of the Esso Oil Pipeline.</p>
7	6.6.23	Identified receptors	<p>The controlled waters assessment should be extended to consider other features such as wells, springs and boreholes that may not be recorded (i.e. do not require a licence) but may be significantly affected by</p>

			the Proposed Development.
8	6.6.33	Potential impacts and mitigation	<p>Paragraph 6.6.33 describes “<i>significant uncertainties</i>” regarding the engineering properties of phosphatic chalk that is known to be present in the study area which could present constraints to the scheme design and construction methods. There is also an increased radon potential from phosphatic chalk.</p> <p>These matters should be assessed in sufficient detail in the ES including as part of the Proposed Development’s vulnerability to and from accidents and disasters (particularly in relation to ground stability) and the potential risks posed to contamination of controlled waters</p>
9	6.6.46	Risk assessment	<p>Specific consideration should be given to the risks of contamination being introduced as a consequence of the construction and operation of the bored tunnel, including hazardous materials that may be required as part of the design.</p> <p>The EIA should also include specific consideration of the energy, material and natural resource use associated with the TBM itself including the use of any potentially hazardous substances or materials that are inherent in the process</p>
10	6.6.50	Limitations and uncertainties	<p>The Applicant explains that the de-watering risk assessment will require a “<i>wider study area</i>”. The assessment should be undertaken in accordance with a wider study where this is necessary, explaining the extent and need for the wider areas.</p>

4.7 Materials

(Scoping Report section 6.2)

The study area is defined as the Proposed Development site and the wider region within which waste management facilities are located and from where construction materials may be sourced.

The assessment methodology is based upon HE IAN 153/11 and the relevant tasks as mentioned in section 6.7.19. Additionally a range of material management routes will be identified and assessed to deal with waste and spoil arisings.

Potential impacts are set out in relation to the construction phase of the Proposed Development and include the impacts on the relevant material markets and waste management facilities with Table 6.31, providing a detailed account of materials used and waste generated. It is noted that to reduce the quantity of waste, a waste management strategy will follow the nationally recognised waste hierarchy.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	6.7.18	Operational Waste	The Inspectorate agrees that an assessment of waste produced during operation can be scoped out due to the very small quantities of waste predicted to arise.
	Para	Other points	Inspectorate's comments
2	6.7.11	Baseline	The Scoping Report states the baseline information for materials will consist of current capacity of the waste infrastructure. This appears to partly contradict section 5.3.1 which states that baselines will be determined at either the start of construction or the start of operation.
3	6.7.17	Potential Impacts	The Scoping Report lacks detail to describe how any proposed mitigation measures will be implemented and secured. The ES should clearly explain the proposed mitigation which is relied upon for the assessment of significant effects. Where the mitigation constitutes specific plans or procedures (for example, construction environmental management

			plans (CEMPs), material management plans and site waste management plans), the interrelationship and relevant hierarchy should be explained.
4	6.7.23	On Site and Off Site management routes for tunnel spoil	<p>The Scoping Report suggests that on-site and offsite locations are to be considered for the management of tunnel spoil.</p> <p>The ES should explain the likely locations and assess the impacts associated including any impacts from transportation and storage. If storage (on site or off site) requires there to be mounds of earth, the duration should be considered alongside consequential impacts such as landscape and visual, water resource and air quality impacts.</p>

4.8 People and Communities

(Scoping Report section 6.8)

The study area is discussed in paragraphs 6.8.5 – 6.8.8 which sets out that multiple study areas will be used in the assessments of this aspect. The approach for determining these is discussed but they are not specifically defined.

The assessment is derived from DMRB Volume 11 and HE IAN 125/15. This has required the combining of a number of chapters of DMRB. In addition to this, this methodology also includes the consideration of civil and military aviation interests and defence, in line with the NPSNN.

The Scoping Report sets out potential impact under each of the subheadings in the aspect chapter. A number of impacts are related to temporary and permanent land take and the disruption which may result on users of the land.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	6.8.4	Civil and Military Aviation and defence interests	<p>The Inspectorate does not consider that sufficient evidence has been presented to demonstrate that this can be scoped out at this stage.</p> <p>For example, the Inspectorate notes the presence of the Boscome Down Airfield and the Larkhill Artillery Range in proximity to the Proposed Development. These sites are identified on the Figures presented in the Scoping Report. The ES should address the potential for the Proposed Development to have a likely significantly effect on these important features.</p>
	Para	Other points	Inspectorate's comments
2	6.8.5 - 6.8.8	Study Area	The ES should include a clear justification for each of these study areas with corresponding figures to aid understanding.
3	6.8.33	Potential Impacts	<p>Whilst the assessment will assess a number of matters, there is no consistent methodology provided for these collectively.</p> <p>The ES should clearly set out the methodology for each assessment including the definition of significance for each of the matters considered.</p>

			The use of summary tables will be important to draw together the various components of the assessment in a coherent form so as to understand the overall significance of effects.
4	6.8.36	Potential Impacts and Mitigation	Reference is made to an Agricultural Land Classification (ALC) survey, although the scope of this survey is not discussed further in the Scoping Report. The Inspectorate considers that any ALC survey and assessment of effects should be prepared in accordance with/having regard to NE's Technical Information Note TIN049 - Agricultural Land Classification: protecting the best and most versatile agricultural land.
5	6.8.57	Methodology	<p>The Scoping Report notes at paragraph 6.8.57 that a 2km buffer either side of the route will be used capture community facilities as part of the NMU. However, paragraph 6.8.5 states an area of 1km will be used to identify PRoW.</p> <p>The ES should ensure that all study areas are clearly depicted, explained are justified and applied consistently.</p>
6	6.8.60	Methodology	In order to assess amenity, the Scoping Report notes that other aspects will be taken into account. However the methodology is not provided to explain how this is to be achieved. The ES chapter should include specific explanation as to the cross referenced data sources from other aspects in the ES.
7	6.8.80 (a)	Assumptions	The Scoping Report notes that one of the assumptions made in the assessments is that crossing points will be provided where each PRoW is crossed by the new road. The ES should demonstrate how mitigation relied upon in this way will be secured in the DCO or other legally binding agreement.
8	6.8.80 (c)	Assumptions	The Scoping Report does not define what is meant by a " <i>community resource</i> " contributing to the local context. Grouping

			of such assets should be defined for the purpose of the assessment along with a description of each of the relevant features identified and description of their contribution to the community.
9	N/A	Tourism	<p>The Chapter makes no reference to tourists (as a group of people) and reference is only made to tourist as non-motorised users.</p> <p>The ES should assess impacts on tourists and tourism specifically as matter within the assessment, and appropriate cross referencing should be made to the LVIA which considers tourists as part of the definition of assessment viewpoints.</p>

4.9 Road Drainage and the Water Environment

(Scoping Report section 6.9)

The study area is set out in paragraph 6.9.2 as being defined by the features of the water environment within 1km of the route alignment and extending to 5km for groundwater. Reference is made to the Water Framework Directive (WFD).

The Scoping Report sets out that a detailed assessment is to be undertaken. The Applicant has set out in the Scoping Report that a conceptual hydrogeological model of the area will be prepared. A risk assessment will be undertaken using source-pathway-receptor which is promoted by DEFRA and the EA. The Scoping Report sets out that the methodology for assessing importance, magnitude and significance of effect is based on DMRB Volume 11, Section 3, Part 10 HD45 – Road Drainage and the Water Environment.

The Scoping Report lists potential impacts in relation to risks to the water environment, risks to groundwater associated with cuttings and/or tunnel construction, impacts to existing abstractions or discharges from dewatering activities, increase in flood risk and potential impacts on water dependent designated sites during construction. Potential impacts during operation are listed in paragraph 6.9.31.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	6.9.24	Reservoir flood risk	The Inspectorate agrees that this can be scoped out of the assessment on the basis that no areas of reservoir flood risk are identified on the EA flood maps.
	Para	Other points	Inspectorate's comments
2	6.9.2	Study Area	<p>The Scoping Report sets out a 1km study area proposed for the assessment which is to be extended to 5km for the groundwater assessment.</p> <p>There is also reference to a 2km zone of influence for consideration as part of the biodiversity assessment (paragraph 6.4.5 of the Scoping Report). It is important that there is consistency across these matters when presented in the ES and any study area should be justified in the ES.</p> <p>These study areas are referred to as being relative to the preferred route alignment, and for clarity, the Inspectorate considers that the study areas should be defined</p>

			<p>relative to the entirety of the DCO boundary.</p> <p>The study areas used for the assessment should be specifically agreed with the EA, the lead local flood authority and if possible based on recognised guidance.</p>
3	6.9.8	Suitable Drainage System (SuDS)	<p>The Wiltshire Council Local Flood Risk Management Strategy and the NPSNN refers to the need for the use of SuDS within the Proposed Development area.</p> <p>Section 3.3.2 of the Scoping Report explains that the drainage design is among the elements of the Proposed Development being developed through autumn and winter 2017. The ES should include sufficient detail as to the drainage design (and how it is to be secured in the DCO) so as to understand its role as mitigation for potential effects on water resources.</p> <p>Paragraph 2.4.7 of the Scoping Report also explains that the proposed method of surface water disposal (at this stage) is via infiltration. The ES should include details of the drainage strategy and explain any other options considered along with the reasons as to why infiltration is the preferred method. The Inspectorate notes the concerns of Wiltshire County Council as part of their response to the scoping consultation (see Appendix 3 of this Opinion).</p>
4	6.9.29 and 6.9.37	Potential Impacts and Mitigation	<p>The assessment should specifically address the impact of the development on potential for groundwater flooding given the construction of the bored tunnel and its potential to affect groundwater movements and levels.</p>
5	6.9.33	Methodology	<p>The Scoping Report explains that sensitive receptors within the study area will be identified. However, it does not set out how the sensitive receptors will be determined.</p> <p>The ES should set out the process of defining receptors and how sensitivity is determined for each against established</p>

			criteria.
6	6.9.36	Methodology	The Scoping Report notes that the methodology to be followed is 'unpublished', as such the Inspectorate is unable to comment if the methodology set out in the Scoping Report reflects that of DMRB. The methodology used in the ES should be explained in detail.
7	6.9.38	Flood Risk and WFD	<p>As the Flood Risk and WFD Assessment are to be standalone documents, the Applicant should ensure clear and consistent cross-referencing to ensure the aspect chapter provides a robust assessment of the water environment. The FRA should give specific consideration to the potential for flooding to and from the bored tunnel section as a result of the construction and operation of the Proposed Development.</p> <p>The same applies to the detailed controlled water risk assessment modelling being undertaken.</p>

4.10 Climate

(Scoping Report section 6.10)

The components of the Proposed Development which are used to establish the study area are set out in paragraph 6.10.4. In relation to the climate change resilience assessment, this is described differently, being the entire project construction site and the surrounding natural environment.

The Applicant intends to undertake two assessments covering Green House Gas (GHG) impact assessment and Climate Change Resilience Assessment. Reference is made to the World Business Council for Sustainable Development (WBCSD)/World Resources Institute (WRI) Greenhouse Gas Protocol Guidelines.

The potential impacts are set out in terms of each of the assessments. For GHG impact assessment, emission sources are set out in Table 6.38. For the Climate Change Resilience assessment, the potential impacts are considered for the climate change factors which make affect the Proposed Development and the risks to the Proposed Development as a result of the climate change factors.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	6.10.20	Consideration of demolition phase of the Proposed Development (in terms of GHG impact assessment)	Notwithstanding the comments made in respect of decommissioning at section 2.3 of this Opinion, the Inspectorate agrees that an assessment of GHG impacts in terms of decommissioning can be scoped out of the EIA.
	Para	Other points	Inspectorate's comments
2	6.10.4	Study Area	<p>The study area is broadly set out in terms of referencing the components of the scheme in its entirety (which does not specifically assist the understanding of the approach to establishing the study area).</p> <p>The ES needs to clearly establish the study area through a clear description and/or figures that enable the limits of the study area to be understood.</p>
3	6.10.6	Study Area	Reference is made to the " <i>entire project construction site and the surrounding natural environment</i> ". This is considered to be slightly ambiguous and the ES should clearly explain and depict these defined areas for both the GHG impact assessment

			and climate change resilience assessments.
4	6.10.9	Baseline	Reference is made to " <i>available and relevant information sources</i> " these are not listed or discussed and as such, the Inspectorate cannot comment. The ES should clearly set out the nature and relevance of specifically cited information sources.
5	6.10.39	Assumptions, limitations and uncertainties	Where information on energy use, types and quantities of materials used and waste generated require assumptions based on industry approximations, professional judgement or best practice will be made, these should be consistent with other aspects within the ES, for example the materials assessment.
6	N/A	Baseline	<p>The dates for the baseline and the future baseline should be clearly identified in the ES and these terms should be applied consistently across other relevant aspects within the ES</p> <p>The Applicant should discuss and agree with relevant statutory consultees the most appropriate data sets for the assessment.</p>
7	N/A	Monitoring	The Scoping Report does not make reference to the potential need for monitoring of GHG emissions during construction and / or operation that may be necessary, depending on the outcomes of the assessment. The need for and scope of any such monitoring should be considered as part of the ES.
8	N/A	Consultation	The Inspectorate recommends that the Applicant consults with Wiltshire Council and relevant statutory bodies to identify specific concerns relating to climate change and how it could affect (or be affected by) the Proposed Development.

4.11 Cumulative Effects

(Scoping Report section 6.11)

The study area proposed relates to the study areas used in the individual aspect chapters. Using these study areas determine the other projects to be taken into account for the Cumulative Impact Assessment.

The Scoping Report sets out the methodology which is in line with the tiered approach advocated in Advice Note 17. The projects to be included in the assessment will be agreed with the Local Planning Authority, statutory consultees and other relevant organisations.

The cumulative effects assessment will consider both inter-project and intra-project effects.

These are not specifically identified at this stage.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
	N/A	N/A	No matters are proposed to be scoped out from the assessment of cumulative effects.
	Para	Other points	Inspectorate's comments
1	6.11.8	Intra-project effects	The Inspectorate notes the importance of the LVIA and archaeological and cultural heritage assessments being appropriately integrated so as to understand the significance of the potential intra-project effects given the particular sensitivity of the project location in respect of these aspects.
2	6.11.9	Zone of influence for other development considered	<p>The relationship between the cumulative developments identified and considered and the assessment of 'committed development' as part of the traffic modelling process should be clearly explained.</p> <p>In this regard the ES should set out and justify the geographical extent of the ZoI and how this has been used to identify other plans or projects on an aspect specific basis to derive the long and short lists of projects.</p>

5. INFORMATION SOURCES

5.1.1 The Planning Inspectorate's National Infrastructure Planning website includes links to a range of advice regarding the making of applications and environmental procedures, these include:

- Pre-application prospectus⁴
- Planning Inspectorate Advice Notes⁵:
 - Advice Note three: EIA consultation and notification;
 - Advice Note four: Section 52;
 - Advice Note five: Section 53 rights of entry;
 - Advice Note seven: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping;
 - Advice Note nine: Rochdale envelope;
 - Advice Note ten: Habitat regulations assessment relevant to nationally significant infrastructure projects (includes discussion of Evidence Plan process);
 - Advice Note eleven: Transboundary impacts
 - Advice Note seventeen: Cumulative effects assessment; and
 - Advice Note eighteen: The Water Framework Directive.

5.1.2 Applicants are also advised to review the list of information required to be submitted within an application for Development as set out in The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended).

⁴ The Planning Inspectorate's pre-application services for applicants. Available from: <https://infrastructure.planninginspectorate.gov.uk/application-process/pre-application-service-for-applicants/>

⁵ The Planning Inspectorate's series of advice notes in relation to the Planning Act 2008 process. Available from: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES⁶

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	Wiltshire Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Dorset and Wiltshire Fire and Rescue Service
The relevant police and crime commissioner	Police and Crime Commissioner for Wiltshire and Swindon
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Berwick St. James Parish Council
	Winterbourne Stoke Parish Council
	Shrewton Parish Council
	Amesbury Town Council
	Durrington Town Council
	Bulford Parish Council
	Steeple Langford Parish Council
	Woodford Parish Council

⁶ Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Wilsford cum Lake Parish Meeting
	Cholderton Parish Meeting
The Environment Agency	The Environment Agency
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Wiltshire Council
The relevant strategic highways company	Highways England
Transport for London	Transport for London
Public Health England, an executive agency of the Department of Health	Public Health England
Relevant statutory undertakers	<i>See Table A2 below</i>
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	Forestry Commission - South West
The Secretary of State for Defence	Ministry of Defence

TABLE A2: RELEVANT STATUTORY UNDERTAKERS⁷

STATUTORY UNDERTAKER	ORGANISATION
The relevant Clinical Commissioning Group	Wiltshire Clinical Commissioning Group
The National Health Service Commissioning Board	NHS England
The relevant NHS Foundation Trust	South West Ambulance Service NHS Foundation Trust

⁷ 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (as amended)

STATUTORY UNDERTAKER	ORGANISATION
Railways	Network Rail Infrastructure Ltd
	Highways England Historical Railways Estate
Road Transport	Transport for London
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes and Communities Agency
The relevant Environment Agency	Environment Agency
The relevant water and sewage undertaker	Wessex Water
The relevant public gas transporter	Cadent Gas Limited
	Energetics Gas Limited
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Quadrant Pipelines Limited
	National Grid Gas Plc
	Scotland Gas Networks Plc

STATUTORY UNDERTAKER	ORGANISATION
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
The relevant electricity distributor with CPO Powers	Energetics Electricity Limited
	ESP Electricity Limited
	G2 Energy IDNO Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Peel Electricity Networks Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Utility Distribution Networks Limited
	Southern Electric Power Distribution Plc
	National Grid Electricity Transmission Plc

TABLE A3: SECTION 43 CONSULTEES (FOR THE PURPOSES OF SECTION 42(1)(B))⁸

LOCAL AUTHORITY⁹
Bath and North East Somerset Council
Cotswold District Council
Dorset County Council

⁸ Sections 43 and 42(B) of the PA2008

⁹ As defined in Section 43(3) of the PA2008

LOCAL AUTHORITY⁹
East Dorset District Council
Gloucestershire County Council
Hampshire County Council
Mendip District Council
New Forest District Council
New Forest National Park Authority
North Dorset District Council
Oxfordshire County Council
Somerset County Council
South Gloucestershire Council
South Somerset District Council
Swindon Borough Council
Test Valley Borough Council
Vale of White Horse District Council
West Berkshire Council
Wiltshire Council

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

Consultation bodies who replied by the statutory deadline:

Amesbury Town Council
Bath and North East Somerset
Cotswold District Council
Durrington Town Council
Environment Agency
ESP Gas Group Ltd
Highways England Historic Railways Estate
Historic England
Health and Safety Executive
National Grid Electricity Transmission PLC and National Grid Gas PLC
NATS Safeguarding
Natural England
New Forest National Park Authority
NHS England
North Dorset District
Royal Mail
South Gloucestershire Council
Transport for London
Wales and West Utilities
Wiltshire Council
Winterbourne Stoke Parish Council

From: [Ben Bendall](#) on behalf of [Planning mail](#)
To: [A303 Stonehenge](#)
Subject: RE: TR010025 - A303 Stonehenge – Amesbury to Berwick Down - EIA Scoping Notification and Consultation - BEN
Date: 23 October 2017 16:44:46

Dear Richard

Thank you for your email, we do not have any comments to make in respect of your email set out below.

Regards,

Ben

From: A303 Stonehenge [mailto:A303Stonehenge@pins.gsi.gov.uk]
Sent: 23 October 2017 16:25
Subject: TR010025 - A303 Stonehenge – Amesbury to Berwick Down - EIA Scoping Notification and Consultation - BEN

FAO Head of Planning Department

Dear Sir/Madam

Please see attached correspondence relating to a scoping consultation for the proposed A303 Stonehenge – Amesbury to Berwick Down scheme.

Please note the deadline for consultation responses is **20 November 2017**, and is a statutory requirement that cannot be extended.

Regards

Richard

Richard Kent
Senior EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate, 3D Temple Quay House, Temple Quay, Bristol BS1 6PN

Direct Line: 0303 444 5895

Helpline: 0303 444 5000

Email: A303Stonehenge@pins.gsi.gov.uk

Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Web: www.infrastructure.planninginspectorate.gov.uk (National Infrastructure Planning)

Twitter: [@PINSgov](https://twitter.com/PINSgov)

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From: [Sarah Tucker](#)
To: [A303 Stonehenge](#)
Subject: RE: TR010025 - A303 Stonehenge - Amesbury to Berwick Down - EIA Scoping Notification and Consultation
Date: 02 November 2017 09:45:49

Good morning,

Durrington Town Council met at its monthly meeting on Tuesday the 31st of October and discussed the A303 Scoping Notification and Consultation relating to the Environmental Impact Assessment and provides the following response:

No Comment

Kind Regards

Sarah Tucker

Clerk to the Council | Durrington Town Council, Town Council Office, Village Hall, High Street, Durrington, Wiltshire, SP4 8AD | Tel: 01980 654772 | Email: clerk@DurringtonTownCouncil.gov.uk, www.durringtontowncouncil.gov.uk

From: A303 Stonehenge [mailto:A303Stonehenge@pins.gsi.gov.uk]
Sent: 23 October 2017 16:09
Subject: TR010025 - A303 Stonehenge – Amesbury to Berwick Down - EIA Scoping Notification and Consultation

Dear Sir/Madam

Please see attached correspondence relating to a scoping consultation for the proposed A303 Stonehenge – Amesbury to Berwick Down scheme.

Please note the deadline for consultation responses is **20 November 2017**, and is a statutory requirement that cannot be extended.

Regards

Richard

Richard Kent
Senior EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate, 3D Temple Quay House, Temple Quay, Bristol BS1 6PN

Direct Line: 0303 444 5895

Helpline: 0303 444 5000

Email: A303Stonehenge@pins.gsi.gov.uk

Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Web: www.infrastructure.planninginspectorate.gov.uk (National Infrastructure Planning)

Twitter: [@PINSgov](https://twitter.com/PINSgov)

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Mr Richard Kent
Senior EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate
3D Temple Quay House
Temple Quay
Bristol BS1 6PN

Our ref: WX/2017/131076/01-L01
Your ref: TR010025-000031
Date: 20 November 2017

Dear Mr Kent

**EIA SCOPING REPORT CONSULTATION - APPLICATION BY HIGHWAYS
ENGLAND FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE A303
STONEHENGE (AMESBURY TO BERWICK DOWN) ROAD SCHEME, WILTSHIRE**

Thank you for consulting the Environment Agency on the Environment Impact Assessment (EIA) Scoping Report for the A303 Stonehenge (Amesbury to Berwick Down) road scheme. We wish to make the following comments, which we recommend be incorporated in the work to be done as part of the EIA. Some points may need clarification at an earlier stage and we are happy for the consultants to discuss these with us.

Chapter 5 – Approach to the Assessment

5.7 Major Events (page 25)

This chapter includes consideration of flood risk, and sets out the need for a Flood Risk Assessment to demonstrate the scheme will not be at risk of flooding and not exacerbate flood risk elsewhere.

5.9 Structure of the Environmental Statement

5.9.2 (page 31) - Confirms that a Flood Risk Assessment will be submitted as a standalone document submitted with the Development Consent Order (DCO) application. Further on in the Scoping Report some detail is provided to explain how flood risk will be assessed. Furthermore the report confirms all sources of flood risk to and from the proposed development will be assessed. To date we have not seen a draft of the Flood Risk Assessment hence we are not in position, at present, to comment any further on the flood risk implications, if any, of the proposed development.

Chapter 6 – Assessment of Effects

6.4 Biodiversity

6.4.5 (page 79) states that the zone of influence for watercourses extends 2km downstream from land required for construction. While this seems sensible with respect to monitoring impacts on the physical environment, consideration should be given to extending this zone of influence upstream of the works area to take into account the potential for impacts on upstream fish populations as a consequence of impacts on fish populations that move through the construction zone during annual migration, or non-migratory movement at other times of the year.

6.4.28 Table 6.15 (page 86) includes the following with respect to fish survey for baseline condition assessment: “Survey of six 500m reaches within core areas of the River Till and River Avon”. Clarification is required as to where the core areas are and we would also suggest that surveys are made upstream of the proposed works area as well if this is not included in the core area already.

6.5 Noise and Vibration

Timing of works that could impact on fish populations is a key constraint, particularly with respect to the proposed bridge works and while this is an issue that would also be dealt with through our normal Environmental Permitting process, the potential for noise to disturb fish movement has not been identified in Section 6.5 (Noise and Vibration). We recommend that the potential impact from noise and vibration on fish movement and other species, as may be experienced from bridge piling works, is included in the consideration of construction impacts and mitigation measures.

6.6 Geology and Soils

6.6.3 (page 103): The investigations of the radial influence of any contamination resulting from construction or operation of A303 route or tunnel should not be limited in distance.

6.6.4 (page 103): De-watering should consider the impact of passive and active de-watering (pumped and gravity drainage) on water quality.

It is agreed that the zone of influence used for considering de-watering and contaminant investigation areas should be informed by future modelling.

6.6.21 (page 107): Method of works for the construction of the road, bridge and tunnel will need to identify actions that will be taken in the event of intercepting contamination. The Esso Pipeline will need to continue to be considered as a potential source if such works identify contamination in this area.

6.6.23 (page 108): The EIA also needs to consider other wells, springs and boreholes that may not be recorded. Water Interest Surveys should have been undertaken to identify such sources that do not require a licence and may exist.

6.6.25 (page 108): Groundwater Risk Assessment should consider the risk of the proposals (construction and operation) on water interests in and around A303.

6.6.34 (page 110): The Hampshire Avon is also failing surface and groundwater chemical status under WFD due to elevated phosphorus concentrations. This impact of

construction and operation of the site on water quality (including mobilisation of phosphorus and leaching potential), should be considered. The results of investigations should also be shared with the EA and partners who are carrying out investigations into this area.

6.6.37 (page 110): Activities from de-watering, etc may also impact on the quantity of surface and groundwaters. This could be detrimental during high and low flows and should be considered. De-watered water may also be discharged to groundwater as well as surface waters.

6.6.38 (page 111): The introduction of land drainage, alteration of recharge and flow pathways in surface and groundwaters may also impact on water quantity to the River Avon and River Till and should also be considered. Road drainage discharges, in particular during accidents, also has the potential to impact on water quality and should be considered and mitigated against.

6.6.42 (page 111): Where required further site investigations should be undertaken to assess the impact of the construction and operation of the tunnel on hydrogeology in the area. This is likely to include undertaking pumping tests to confirm aquifer hydraulic conductivity and storativity.

6.6.50 (page 114): The scope of the Hydrogeological Risk Assessment should be agreed with the Environment Agency before it takes place. The primary aim should be to determine the impact of the proposals on surface and groundwater quality, quantity and receptors.

6.7 Materials (page 114)

Highways England and its consultants need to ensure duty of care for any waste material produced by this project. This would need to include any hazardous waste produced. If there are fuel bowsers/tanks onsite these must be bunded and stored in a suitable area. Any amenity issues for local resident must be risk assessed and controlled.

6.9 Road Drainage and the Water Environment (page 135)

We welcome the “very high” importance assigned to groundwater and surface water receptors in this sensitive area and the proposal to undertake Detailed Assessment of the impacts on quality and quantity both during the construction and operational phases of the scheme. Groundwater abstractions without published Source Protection Zones should be identified through a thorough water interest survey and given the same level of consideration and assessment as those with published zones.

6.9:2 (page 135): We note that the assessment of surface water impacts is proposed to extend to 1km from the preferred route alignment, but the groundwater assessment will extend to 5km. Due to the interaction between groundwater and surface water in the area, there may be impacts on surface water features beyond 1km and these should be considered as part of an integrated water environment assessment. Impacts on groundwater may also extend beyond 5km, so the zone of consideration should be determined through calculation of the radius of influence of the proposed activities and based on site specific hydrogeological data. Where necessary further water interest surveys may need to be undertaken in any locations, identified as being impacted by the proposals.

In Section 6.9.2 it states that the scope of the assessment is “features of the water environment within 1km of the preferred route alignment”. Please can it be confirmed how this relates to the 2km limit for the zone of influence cited in paragraph 6.4.5.

6.9.11 Table 6.35 WFD Surface Water Body Summary (page 136): Enhancement strategies for improving WFD status should be promoted wherever possible e.g. by reducing existing road runoff to rivers. Hence an assessment of current road runoff impacts to the rivers from road and field drainage should be included for assessment where possible.

6.9.22 (page 139): The proposals should also consider the impact of the development on groundwater flooding. The proposals have the potential to impede groundwater movement and so raising water levels locally and diverting more or less groundwater to certain parts of the catchment. The impact of this on water resources and flooding should be considered and where necessary mitigation put forward.

6.9.32 Operational mitigation (page 143): Bullet point c) refers to the potential need for relocating existing abstractions and discharges. This may lead to the need for Environment Permit or Abstraction Licence reviews because the environmental risk assessment and granting of a permit or abstraction licence would be based on the existing location. The Environment Agency would need to be consulted on these specific proposals.

6.9.35 (page 144): The conceptual model can be informed by the Wessex Basin Groundwater Model. The numerical model (and other models where appropriate) should be used to quantify potential impacts of the proposals on surface and groundwater quality quantity and flooding.

6.9.37 (page 144): Further site investigations may be required to confirm or revise the aquifer parameters included in the Wessex Basin Model and used in the Hydrogeological Quantitative Risk Assessment.

Figures

Fig 6.7 Water Features (page 175 onwards)

The River Avon and River Till are identified on this plan, but more detailed mapping of all watercourses crossed by the road should be identified. Construction methods to prevent pollution have been discussed in general, but site specific method statements will be required for these waterbodies to be approved by the Environment Agency prior to construction or other works commencing.

General comments

Groundwater and contaminated land

It is noted that a separate Groundwater Assessment will be submitted with the DCO application. It is not clear what information will be included in the Groundwater Assessment or the relative timescales in its delivery. This information should be confirmed. It may be difficult to fully assess the environmental impact of the scheme without the detailed understanding that may be expected to be gained from the Groundwater Assessment. We understand that it has not been possible to complete significant investigation of the groundwater conditions and phosphatic chalk along the route that was planned for this year and therefore the EIA will be based primarily on modelled data. The assessment should consider the uncertainties in these results and what further information will be required to ensure risks to quality and quantity of

controlled waters are acceptable. Due to the tight timescales proposed for the planning stages of the scheme, it is essential that any requirement for further ground investigation is identified at the earliest opportunity to allow the data to be obtained and decisions based on sound evidence.

Biodiversity and fisheries

We believe that the scoping report is thorough in terms of biodiversity issues and believe it has covered aspects we would like to see included in the Environmental Statement. However we recommend the following policies, plans and programmes to also be considered within the EIA.

River Avon Restoration Project - The River Avon Special Area of Conservation (SAC) is failing to meet its environmental objectives under the Water Framework Directive (WFD). Many reaches have been assessed as being in 'unfavourable condition' due to modifications of the channel or structures in the channel.

The '***Strategic Framework for the Restoration of the River Avon***' report (SFfRRA) was produced in 2009 to set out a future vision for the whole river system. This was jointly produced by a number of partners including Natural England, Wessex Water, the Wiltshire Fisheries Association and the Wessex Chalk Streams Project. A consultation involving a large number of stakeholders was also undertaken at that time. Works to restore the river have been ongoing and the activities described in this plan are part of that ongoing programme. The aim of this project is to restore river reaches to 'favourable condition' (where they are designated as an SSSI) and to 'favourable conservation status' (under the Water Framework Directive).

Natural Environment and Rural Communities Act 2006: This sets out the biodiversity duty of public authorities. The Duty is set out in Section 40 of the Act, and states that "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity". The Duty applies to all local authorities, community, parish and town councils, police, fire and health authorities and utility companies.

Biodiversity 2020: A strategy for England's wildlife and ecosystem services: This builds on the Natural Environment White Paper and provides a comprehensive picture of how we are implementing our international and EU commitments. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea. The mission is to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.

I hope this information is useful, but please contact me if you have any queries.

Yours sincerely

Miss Katherine Burt
Sustainable Places - Planning Specialist

Direct dial 02030 259339
Direct fax 01258 455998
Direct e-mail swx.sp@environment-agency.gov.uk

From: [ESP Utilities Group Ltd](#)
To: [A303 Stonehenge](#)
Subject: Your Reference: A303 Stonehenge: TR010025-000031. Our Reference: PE133301. Plant Not Affected Notice from ES Pipelines
Date: 24 October 2017 12:36:20

Richard Kent
The Planning Inspectorate

24 October 2017

Reference: A303 Stonehenge: TR010025-000031

Dear Sir/Madam,

Thank you for your recent plant enquiry at (A303 Stonehenge: TR010025-000031).

I can confirm that ESP Gas Group Ltd has no gas or electricity apparatus in the vicinity of this site address and will not be affected by your proposed works.
Therefore, ESP **DOES NOT OBJECT**.

ESP are continually laying new gas and electricity networks and this notification is valid for 90 days from the date of this letter. If your proposed works start after this period of time, please re-submit your enquiry.

Important Notice

Please be advised that any enquiries for ESP Connections Ltd, formerly known as British Gas Connections Ltd, should be sent directly to us at the address shown above or alternatively you can email us at: PlantResponses@espipelines.com

Yours faithfully,

Alan Slee
Operations Manager



Bluebird House
Mole Business Park
Leatherhead
KT22 7BA

☎ 01372 587500 📠 01372 377996

<http://www.espug.com>

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From: [Davies, Robert](#)
To: [A303 Stonehenge](#)
Subject: A303 Stonehenge - Amesbury to Berwick Down Scoping Consultation
Date: 25 October 2017 10:09:54

Dear Sirs

I refer to your letter dated 23rd October 2017 in respect of the above and confirm that we do not have any comments to make upon the information to be provided in the Environmental Statement.

Regards

Rob Davies

Robert Davies

Historical Railways Estate (on behalf of Department for Transport)

Highways England | 37 Tanner Row | York | North Yorkshire | Y01 6WP

Tel: + 44 (0) 7740418158

Web: <http://www.highwaysengland.co.uk>

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/National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park,
Birmingham B32 1AF | [https://www.gov.uk/government/organisations/highways-](https://www.gov.uk/government/organisations/highways-england)
[england](http://www.highwaysengland.co.uk) | info@highwaysengland.co.uk

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Historic England

SOUTH WEST OFFICE

Mr Richard Kent
The Planning Inspectorate
3/18 Eagle Wing
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Direct Dial: 0117 9750699

Our ref: PL00201547

15 November 2017

Dear Mr Kent

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (the EIA
Regulations) - Regulations 10 and 11**

**Application by Highways England for an Order granting
Development Consent for the A303 Stonehenge -Amesbury to
Berwick Down**

Scoping consultation response

Thank you for consulting Historic England in respect of the scope of Environmental Impact Assessment on this scheme proposal.

In line with the advice in the National Planning Policy Framework (paragraph 128), we would expect any Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon the historic environment. In terms of detailed assessment methodology, we would expect any assessment of settings to be undertaken in accordance with our recently-published guidance (HE 2015 *Good Practice Advice in Planning, Note 3, The Setting of Heritage Assets*). Similarly, we would expect the over-arching EIA methodology to accord with the guidance given in Highways Agency note 20807 of 2007, commonly known as DMBRB 2.

The Highways England Scoping Report (ref. P03, S4) dated 20th October 2017 sets out proposals for undertaking the appropriate assessment within those parameters. Whilst the Scoping Report is broadly acceptable, we would advise that the following points are addressed by the applicant to ensure that the heritage dimension of the Environmental Statement is robust and fully scoped to properly assess heritage impacts. Reference numbers reflect those used in the Scoping Report:

6.2.2 - We note that a HIA scoping report compliant with the 2011 ICOMOS guidance



29 QUEEN SQUARE BRISTOL BS1 4ND

Telephone 0117 975 1308
HistoricEngland.org.uk





SOUTH WEST OFFICE

is in preparation, to set out the extent of work required to assess the impacts of the scheme upon the Outstanding Universal Value (OUV) of the Stonehenge component of the Stonehenge, Avebury and Associated Sites World Heritage Site (the WHS). We want to emphasise the need for the OUV HIA to be fully integrated into the ES Cultural Heritage chapter - that is, for the links between the two pieces of assessment to be clarified at this stage. With the WHS being identified by NPPF as one of the most important types of designated heritage assets, it is important that the effects of development upon it are clearly set out in the main ES and not just relegated to an appendix to it.

6.2.7 (Planning Policy Context) - the Scoping Report should in our view set out the relevant international policy and guidance governing WHSs in addition to the national and local planning context - that is: the UK's ratification of the 1972 World Heritage Convention; the relevant Operational Guidelines for the management of Cultural World Heritage Properties; and the International Council for Monuments and Sites (ICOMOS) guidance for Heritage Impact Assessment.

6.2.15 (non-designated assets) - the Scoping Report should acknowledge that some of the undesignated heritage assets will be relevant to the OUV of the WHS and that in addition some may be of national importance in their own right.

6.2.19 - the potential impact of the scheme upon dark skies should also be assessed. Within and adjacent to the WHS the preservation (or improvement of) dark skies contributes directly to the OUV of the WHS via Attribute 4 of the 2013 Statement of Outstanding Universal Value (SOUV): *The design of Neolithic and Bronze Age funerary and ceremonial sites and monuments in relation to the skies and astronomy.*

6.2.21 - please note that whilst HMAG is part of the Scientific Committee the reverse, as suggested by the Scoping Report text, is not true. The Scientific Committee does not have a role in providing formal curatorial advice on planning matters.

6.2.2.5 - as noted above, it is in our view essential that the results of the OUV HIA are integrated into the main ES and the applicant should set out how this is to be achieved.

Table 6.5 - NPPF clearly states that WHSs, Scheduled Monuments and Grade I and II* Listed Buildings are heritage assets of the highest significance. The table should be revised to reflect this showing these assets as having equal Very High importance.

6.2.3.8 - here, or later at 6.2.41, the importance of dark skies as an aspect of setting both for the OUV of the WHS and for the setting of individual Scheduled Monuments were relevant, should be acknowledged and in this section of the Scoping Report, appropriate assessment methodology set out. The impact of any scheme lighting is of particular sensitivity to the significance of the WHS.



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6.2.52 - the applicant should reference the Overarching Written Scheme of Investigation (OWSI) which will inform individual Site Specific WSIs together with the Archaeological Evaluation Strategy.

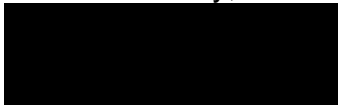
6.3 - Landscape and Visual - should set out how effects on dark skies will be assessed

6.3.8 - what work has been done to establish these parameters of assessment? The WHS lies within an open, rolling landscape with very long views on clear days. We are concerned that any potential for visual impact beyond 5km is established at this early stage. This comment is also relevant to our concerns about the preservation of dark skies where they exist and contribute to the OUV of the WHS or the setting of a Scheduled Monument.

6.3.60b) - our understanding is that no bunds or other earthworks will be constructed within the WHS - can this please be clarified? Such features will impact upon OUV.

I hope that this advice is clear but please don't hesitate to contact me again should you wish to discuss any aspect of this letter.

Yours sincerely,



Phil McMahon
Inspector of Ancient Monuments
phil.mcmahon@HistoricEngland.org.uk

cc: Melanie Pomeroy-Kellinger, Clare King, Wiltshire Council Archaeology Service



29 QUEEN SQUARE BRISTOL BS1 4ND

Telephone 0117 975 1308
HistoricEngland.org.uk



CEMHD Policy - Land Use Planning
NSIP Consultations
Building 2.2, Redgrave Court
Merton Road, Bootle
Merseyside, L20 7HS

Your ref: TR010025

Our ref: 4.2.1.6137

HSE email: NSIP.applications@hse.gov.uk

FAO Richard Kent
The Planning Inspectorate
Temple Quay House
Temple Quay,
Bristol
BS1 6PN

Dear Mr Kent

17 Nov 2017

**PROPOSED A303 STONEHENGE – AMESBURY TO BERWICK DOWN (the project)
PROPOSAL BY HIGHWAYS ENGLAND (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) – Regulations 10 and 11**

Thank you for your letter of 23rd October 2017 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

With reference to drawings (figure 2.1 - Location of the scheme) contained in document 'A303 Stonehenge Amesbury to Berwick Down, EIA Scoping Report, P03, S4, 20 October 2017, Highways England' the proposed draft DCO site boundary at Rollestone Camp falls within the HSE Public Safety Consultation Zones of a Major Hazards Installation.

There are currently no Major Accident Hazard Pipelines in the vicinity of the proposed road development.

The Major Accident Hazard Installation is MOD (Army) Rollestone Camp (HSE ref H2034).

With regard to 5.7 in the above document, Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE is consulting further with the Planning Inspectorate to clarify this requirement.

Explosives sites

As there are no licensed explosive sites in the vicinity, HSE has no comment to make in this regard.

Electrical Safety

No comment from a planning perspective

Waste

In respect of waste management the applicant should take account of and adhere to relevant health and safety requirements. More details can be found on HSE's website at:

<http://www.hse.gov.uk/waste/index.htm>

Please send any further electronic communication on this project directly to the HSE's designated e-mail account for NSIP applications. Alternatively any hard copy correspondence should be sent to:

Mr Dave Adams (MHPD)
NSIP Consultations
2.2 Redgrave Court
Merton Road, Bootle,
Merseyside L20 7HS

Yours sincerely,



Dave Adams
(CEMHD4 Policy)

Land and Acquisitions

Spencer Jefferies
Development Liaison Officer
Network management
Spencer.Jefferies@nationalgrid.com
Direct tel: +44 (0)7812 651481

SUBMITTED ELECTRONICALLY:
A303Stonehenge@pins.gsi.gov.uk

www.nationalgrid.com

18 November 2017

Dear Sir/Madam

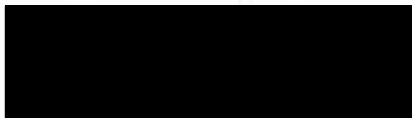
Application by Highways England for an Order granting Development Consent for the A303 Stonehenge – Amesbury to Berwick Down

This is a response on behalf of National Grid Electricity Transmission PLC (NGET) and National Grid Gas PLC (NGG)

I refer to your letter dated 23rd October 2017 regarding the future Order. NGET and NGG have no assets in the order boundary of the proposed DCO. Therefore, National Grid would not object to the order.

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

Yours sincerely



Spencer Jefferies
Development Liaison Officer, Land and Acquisitions.

From: [ALLEN, Sarah J](#) on behalf of [NATS Safeguarding](#)
To: [A303 Stonehenge](#)
Subject: Your Ref: TR010025-000031 (Our Ref: SG25329)
Date: 25 October 2017 14:27:34
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours Faithfully

NATS

NATS Safeguarding

D: 01489 444687

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



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From: [Routh, Charles \(NE\)](#)
To: [A303 Stonehenge](#)
Subject: RE: A303 Stonehenge – Amesbury to Berwick Down - EIA Scoping (PINS) TR010025. NE ref: 229636
Date: 20 November 2017 14:48:19

Dear Mr Kent,

Thank you for consulting Natural England on the Environment Impact Assessment (EIA) Scoping Report for the A303 Stonehenge (Amesbury to Berwick Down) road scheme. We have the following comments to make:

Landscape and Visual

We are unable to comment in detail on the view point locations. We advise that the views of the Cranborne Chase AONB planning officer are sought as to the choice of viewpoints. It may be appropriate, given the national importance of the AONB to at least consider whether a long distance view from the south side of the Wylve valley (5km away) would be useful. It may also be appropriate to consider whether a view point mid-way between viewpoints 36 and 40 looking just south of east would be useful. Natural England would be glad to discuss this further with the applicant.

Biodiversity

Stone curlew are a feature of the Salisbury Plain Special Protection Area. The EIA does not appear to propose to gather data on this species other than in the context of Normanton Down. We advise that data on stone curlew nesting sites should be gathered for the EIA, and the impact explicitly considered.

The road has the potential to affect the River Avon via changes to the hydrological regime. The EIA should consider this, and gather such data as is needed.

People and communities

The scoping document says: "6.8.36 The ALC survey...". This survey is not referred to elsewhere in the scoping document. We advise an Agricultural Land Classification (ALC) survey, to an appropriate specification, is required for the EIA, and impacts assessed.

In other regards we have no comments to make.

Charles Routh
Lead Advisor, Planning & Licencing, Somerset, Avon and Wiltshire Area Team, Natural England.
07990 773630

From: A303 Stonehenge [<mailto:A303Stonehenge@pins.gsi.gov.uk>]
Sent: 23 October 2017 16:09
Subject: TR010025 - A303 Stonehenge – Amesbury to Berwick Down - EIA Scoping Notification and Consultation

Dear Sir/Madam

Please see attached correspondence relating to a scoping consultation for the proposed A303 Stonehenge – Amesbury to Berwick Down scheme.

Please note the deadline for consultation responses is **20 November 2017**,

and is a statutory requirement that cannot be extended.

Regards

Richard

Richard Kent
Senior EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate, 3D Temple Quay House, Temple Quay, Bristol
BS1 6PN

Direct Line: 0303 444 5895

Helpline: 0303 444 5000

Email: A303Stonehenge@pins.gsi.gov.uk

Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Web: www.infrastructure.planninginspectorate.gov.uk (National Infrastructure Planning)

Twitter: [@PINSgov](https://twitter.com/PINSgov)

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Mr R Kent
The Planning Inspectorate

16 November 2017

Dear Mr Kent

Case Number **EQ/17/50103**
Proposal
Site

Your Reference: 17/50103

Thank you for your correspondence received on 25 October 2017.

NO COMMENT

I trust this information clarifies the points raised in your letter. Please do not hesitate to contact me on the number below if I can be of further assistance.

Yours sincerely

Carly Cochrane
Planning Officer
Direct Line: 01590 646621
Email: carly.cochrane@newforestnpa.gov.uk

Please be advised that advice is made without consideration to any third party comments, and is offered without prejudice to the determination of any subsequent planning application.

From: [CONTACTUS, England \(NHS ENGLAND\)](#)
To: [A303 Stonehenge](#)
Subject: RE: TR010025 - A303 Stonehenge – Amesbury to Berwick Down - EIA Scoping Notification and Consultation CAS-361775 BR
Date: 24 October 2017 16:29:13

Dear Richard

Thank you for your email of 23 October 2017. However your enquiry is not something that is handled by the NHS England Customer Contact Centre.

The NHS England Customer Contact Centre is the public facing part of the organisation primarily set up to handle general enquiries, complaints & Freedom of Information requests from members of the public regarding primary care services.

As this relates to property services, it would be my suggestion to contact NHS Property Services directly on the following telephone number – 0800 085 3015

For further information, please review the following link

<http://www.property.nhs.uk/contact-us/>

Regards

Ben

NHS England
PO Box 16738 | Redditch | B97 9PT
0300 3 11 22 33
england.contactus@nhs.net
www.england.nhs.uk

From: A303 Stonehenge [mailto:A303Stonehenge@pins.gsi.gov.uk]
Sent: 23 October 2017 16:11
To: CONTACTUS, England (NHS ENGLAND)
Cc: WILLIAMSON, Gus (NHS ENGLAND)
Subject: TR010025 - A303 Stonehenge – Amesbury to Berwick Down - EIA Scoping Notification and Consultation

Dear Sir/Madam

Please see attached correspondence relating to a scoping consultation for the proposed A303 Stonehenge – Amesbury to Berwick Down scheme.

Please note the deadline for consultation responses is **20 November 2017**, and is a statutory requirement that cannot be extended.

Regards

Richard

Richard Kent
Senior EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate, 3D Temple Quay House, Temple Quay, Bristol BS1 6PN
Direct Line: 0303 444 5895
Helpline: 0303 444 5000
Email: A303Stonehenge@pins.gsi.gov.uk
Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)
Web: www.infrastructure.planninginspectorate.gov.uk (National Infrastructure Planning)
Twitter: [@PINSgov](https://twitter.com/PINSgov)

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Your Ref:
Our Ref: 2/2017/1778/NLA
Ask For:

Date: 6th November 2017



North Dorset District Council
Nordon
Salisbury Road
Blandford Forum
Dorset DT11 7LL

01258 454111
www.dorsetforyou.gov.uk

Mr R Kent, Senior EIA And Land Rights
Advisor
The Planning Inspectorate
3 D Eagle Wing
2 The Square
Bristol
BS1 6PN

**Town and Country Planning (Development Management Procedure) (England)
Order 2015**

CONSULTATION ACKNOWLEDGEMENT

Dear Sir/Madam

Proposal: Application by Highways England for an Order granting Development Consent for the A303 Stonehenge Amesbury to Berwick Down.

Location: A303 Stonehenge - Amesbury To Berwick Down

Thank you for your consultation dated 24 October 2017 relating to the above mentioned development, which has been given the reference number 2/2017/1778/NLA.

The Planning Officer dealing with this matter will endeavour to forward the observations/comments of this council to you by 14 November 2017.

Yours faithfully


Head of Planning

Email: devcontrol@north-dorset.gov.uk
Phone: 01258 484 220



A303 Stonehenge – Amesbury to Berwick Down

Royal Mail Group Limited comments on information to be provided in applicant's Environmental Statement

Introduction

Reference the letter from PINS to Royal Mail dated 23 October 2017 requesting Royal Mail's comments on the information that should be provided in Highways England's Environmental Statement.

Royal Mail's consultants BNP Paribas Real Estate have reviewed the applicant's Scoping Report as submitted to PINS on 20 October 2017.

Royal Mail- relevant information

Royal Mail is responsible for providing efficient mail sorting and delivery nationally. As the Universal Service Provider under the Postal Services Act 2011, Royal Mail has a statutory duty to deliver mail to every residential and business address in the country as well as collecting mail from all Post Offices and post boxes six days a week.

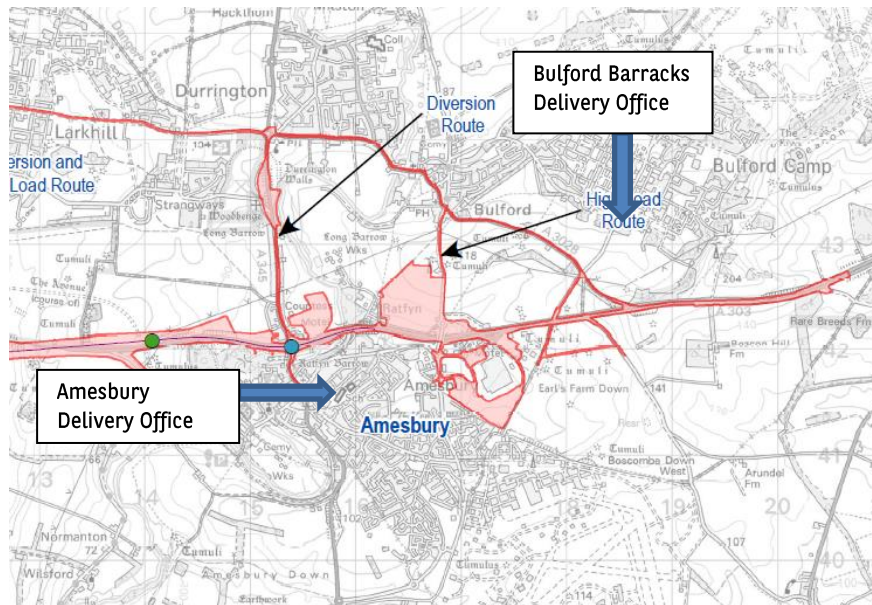
Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.

Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

Royal Mail therefore wishes to ensure the protection of its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations which may potentially be adversely affected by the construction and operation of this proposed scheme.

Royal Mail's has a two operational Delivery Offices both within 0.5 km of the proposed DCO boundary as listed and shown on plan below:

Amesbury Delivery Office	SP4 7EW	0.15 km
Bulford Barracks Delivery Office	SP4 9JB	0.5 km



The A303 is a crucial distribution route for Royal Mail and this section of it has to be crossed by local delivery vehicles, with a minimum of 13 vehicle movements daily.

Also, in exercising its statutory duties Royal Mail vehicles use on a daily basis all of the other local roads that may potentially be affected by additional traffic arising from the construction of the proposed A303 improvements.

Royal Mail's comments on information that should be provided in Highways England's Environmental Statement

Royal Mail has the following comments / requests:

1. Royal Mail requests that the ES includes information on the needs of major road users (such as Royal Mail) and acknowledges the requirement to ensure that major road users are not disrupted though full advance consultation by the applicant at the appropriate time in the DCO and development process.
2. The ES and DCO application should include detailed information on the construction traffic mitigation measures that are proposed to be implemented, including a draft Construction Traffic Management Plan (CTMP).
3. Royal Mail requests that it is fully pre-consulted by Highways England on any proposed road closures / diversions/ alternative access arrangements, hours of working and the content of the CTMP. The ES should acknowledge the need for this consultation with Royal Mail and other relevant local businesses / occupiers.

Royal Mail is able to supply the applicant with information on its road usage / trips if required.

Should PINS or Highways England have any queries in relation to the above then in the first instance please contact Holly Trotman (holly.trotman@royalmail.com) of Royal Mail's Legal Services Team or Daniel Parry-Jones (daniel.parry-jones@bnpparibas.com) of BNP Paribas Real Estate.

From: [Myles Kidd](#)
To: [A303 Stonehenge](#)
Cc: [Donna Whinham](#); [Richard Gillingham](#); [Helen O'Connor](#)
Subject: TR010025 - A303 Stonehenge – Amesbury to Berwick Down - EIA Scoping Notification and Consultation
Date: 02 November 2017 16:18:22

Your reference: TR010025-000031

Dear Mr Kent

Thank you for your email of 23rd October and linked Environmental Impact Assessment Scoping Report for the A303 scheme. We have reviewed the scoping document and South Gloucestershire Council do not have any comments to add.

Kind Regards

Myles

Myles Kidd B.Eng. (Hons) MCIHT, CMILT, MTPS

Transport Development Control Manager
Strategic Transport & Environmental Policy
Department of Environment & Community Services
South Gloucestershire Council

: PO Box 1954, Bristol, BS37 0DD

Office: Badminton Road, Yate, BS37 5AF

: 01454 86 5351

: Myles.Kidd@southglos.gov.uk

: www.southglos.gov.uk

From: A303 Stonehenge [<mailto:A303Stonehenge@pins.gsi.gov.uk>]

Sent: 23 October 2017 16:25

Subject: TR010025 - A303 Stonehenge – Amesbury to Berwick Down - EIA Scoping Notification and Consultation

FAO Head of Planning Department

Dear Sir/Madam

Please see attached correspondence relating to a scoping consultation for the proposed A303 Stonehenge – Amesbury to Berwick Down scheme.

Please note the deadline for consultation responses is **20 November 2017**, and is a statutory requirement that cannot be extended.

Regards

Richard

Richard Kent
Senior EIA and Land Rights Advisor
Major Casework Directorate

The Planning Inspectorate, 3D Temple Quay House, Temple Quay, Bristol
BS1 6PN

Direct Line: 0303 444 5895

Helpline: 0303 444 5000

Email: A303Stonehenge@pins.gsi.gov.uk

Web: www.gov.uk/government/organisations/planning-inspectorate (The
Planning Inspectorate)

Web: www.infrastructure.planninginspectorate.gov.uk (National
Infrastructure Planning)

Twitter: [@PINSgov](https://twitter.com/PINSgov)

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From: [Carr Richard](#)
To: [A303 Stonehenge](#)
Subject: No comment response from TfL
Date: 31 October 2017 10:26:03
Attachments: [TR010025 Letter to stat cons Scoping & Reg 11 Notification .pdf](#)

Thanks you for consulting Transport for London (TfL). I can confirm that due to the distance from London, TfL has no comments to make on the scoping opinion for the Environmental Statement

Best wishes

Richard Carr I Principal Planner (Borough Planning)
TfL Planning, Transport for London

E: richardcarr@tfl.gov.uk

A: 9th Floor, 5 Endeavour Square, E20, Westfield Avenue, E20 1JN

I work part time and so there may be a short delay in responding to emails

For more information regarding the TfL Borough Planning team, including TfL's *Transport Assessment Best Practice Guidance*, and pre-application advice please visit <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>

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From: [Danielle Thomas](#) on behalf of [Dig](#)
To: [A303 Stonehenge](#)
Subject: RE: TR010025 - A303 Stonehenge – Amesbury to Berwick Down - EIA Scoping Notification and Consultation
Date: 24 October 2017 11:52:05
Attachments: [image001.png](#)

Good morning,

With regards to your below request, this is not Wales & West Utilities area. This falls within Southern Gas Network's area, contact details for them below:

Email: plantlocation@sgn.co.uk
Telephone: 0845 070 3497

If you have any further questions please don't hesitate to contact me. Many thanks

Kind Regards,

Danielle Thomas
Plant Protection Team
Administrator Assistant

Telephone: **02920 278 912**
Email: Danielle.Thomas@wwutilities.co.uk

Wales & West Utilities Ltd | Wales & West House | Spooner Close | Celtic Springs | Newport | NP10 8FZ



From: A303 Stonehenge [<mailto:A303Stonehenge@pins.gsi.gov.uk>]
Sent: 23 October 2017 16:09
Subject: TR010025 - A303 Stonehenge – Amesbury to Berwick Down - EIA Scoping Notification and Consultation

Dear Sir/Madam

Please see attached correspondence relating to a scoping consultation for the proposed A303 Stonehenge – Amesbury to Berwick Down scheme.

Please note the deadline for consultation responses is **20 November 2017**, and is a statutory requirement that cannot be extended.

Regards

Richard

Richard Kent
Senior EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate, 3D Temple Quay House, Temple Quay, Bristol BS1 6PN

Direct Line: 0303 444 5895

Helpline: 0303 444 5000

Email: A303Stonehenge@pins.gsi.gov.uk

Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

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20th November 2017

Mr Richard Kent
Senior EIA and Land Rights Advisor
The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Highways and Transport
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Your ref: TR010025-000031

Our ref:

Dear Mr Kent

Re: A303 Stonehenge – Amesbury to Berwick Down, Scoping Consultation and Notification of Applicant's Contact Details and Duty to Make Available Information to the Applicant if requested

Thank you for your letter dated 23rd October 2017 and the opportunity to comment on the EIA Scoping Report prepared by Highways England.

Wiltshire Council has considered the documentation and has both general and specific comments to make on the information provided. These are detailed below.

Please note that these comments cover the majority of our service areas, however due to extenuating circumstances, it has not been possible to include comments from our Public Rights of Way team. It is accepted that any comments received after the deadline will not be incorporated within your response, but we will provide them as soon as we can and hope that you will forward them to Highways England.

General Comments:

Whilst it is acknowledged that there is reference to the unpublished work undertaken by Atkins in the preliminary site scoping and route selection part of the programme, we wish to convey the importance of using this data, especially for protected species. It is our belief that this significantly augments the information that is currently held at the records centre, especially for Annex II bat species. This information should be afforded a high-level of importance due to the time-lag between the data being published and it being incorporated into the records centre system.

The prominence of the need to assess the development proposal on the Outstanding Universal Value (OUV) of the World Heritage Site (WHS) could be strengthened within the document. Whilst it does refer to the fact that a separate Heritage Impact Assessment (HIA) specifically addressing OUV will be undertaken, the proposed EIA methodology will need to cross reference the HIA and OUV more than has been proposed in this scoping document.

Furthermore, as the scheme goes beyond the WHS boundaries, it would be expected that the EIA would include a section or appendix which contains a HIA that goes beyond the WHS boundaries, as the references currently tend to refer to this as covering the impact on the WHS. It should also examine the impact on the other designated heritage assets and those undesignated ones identified within the scoping report, i.e. conservation areas, listed buildings etc.

The excavation of the tunnel and associated engineering works to provide the new road have the capacity to generate a lot of material that may (if not re-used on the route) create a lot of additional HGV traffic that will be using the local road network. This hasn't been explored in detail within the report as the calculations are still outstanding. However, it would be expected that the EIA examine this and the associated ramifications, for example, if a lot of additional traffic is generated, it could use routes through AQMA's further afield, depending on where its end, delivery point was.

Further information is required on proposed haulage routes.

Whilst the DMRB is a useful tool, due to its attribution of a level of value and the inferences inevitably drawn therefrom, there is a potential for some risk of conflict with advice from other stakeholders.

Specific Points on Content of Report:

1.1.2 – The Avebury part of the WHS should be included within the HIA and should be cross referenced here

1.2.7/8 – The Stonehenge, Avebury and Associated Sites WHS Management Plan 2015, (endorsed by UNESCO, UK Government), which is a significant material consideration in making land use decisions which have potential impact on the WHS, should be mentioned here. Delivering objectives of this plan should be a golden thread running throughout the EIA

1.2.8 – The Development Plan policy relevant to the proposed scheme consists of the following adopted plans:

b) Saved policies of the ~~North~~ Salisbury District Local Plan 2011 adopted in 2003 (Ref 5);

1.44 Table 1 – The proposed plans should include the WHS boundary

2.4.7 – We are concerned about the proposed use of infiltration for the scheme. This is because the ground water levels during 2013/14 were at or above ground level and it is assumed that a high percentage of the flooding referred to in 6.10.19 was Ground Water generated. Therefore we are unsure how infiltration would work during high ground water incidents

2.4.13 – Wording should be amended to state “of at least” 2.9 km

4.1.2 – This should include international advisors and consultees e.g. ICOMOS and World Heritage Centre

Section 5 Approach to Assessment – ICOMOS HIA guidance should be referred to, along with a statement of how the HIA is going to be integrated with the EIA

5.4.17 and / or 6.11 – Better clarity regarding cumulative impacts might be achieved if some of the known major developments taking place in the vicinity were mentioned to provide context. Suggested examples include, Army Basing, Porton Down Science Park and residential extension to Amesbury at Kings Gate

5.6.2 b – This should include OUV as well as cultural heritage

5.6.2 and 6.2.19 – It is noted that no lighting assessment has been included here but it is thought that it should be

5.7 Major Events, Appendix B and Table 5.5 – The impact of events on the historic environment, including OUV, should be included here

6.1.3 – It is not thought to be sufficient to assume “the influence of improving vehicle exhaust emissions standards is likely to be greater than any additional growth in traffic in subsequent operational assessment years”. Although trends in nitrogen dioxide levels have been downward, there has been an increase in traffic generally. The improvement of the road, whilst welcome, could encourage more traffic to use the route. The potential impact on relevant exposure close to the Countess Roundabout is of concern

6.1.6 – Whilst the regional assessment of air quality is welcome, specific detail of what this will report is sought. Paragraph 6.1.7 wrongly identifies Salisbury Centre as the nearest AQMA. The nearest is the Wilton Road (A36T) Salisbury AQMA, which incorporates the lower end of Devizes Road (A360), both of which take HGV traffic to and from Southampton port. Nitrogen dioxide levels on Castle Road (A345) are under close scrutiny. (41ug/m³, 2016)

Modelling should examine the impact the project will have on flows on the wider road network, with particular reference to the Wilton Road AQMA, having regard to the cumulative effects of other development proposed within the Core Strategy and associated policies

6.1.20 – The exact locations on diffusion tube sites within Wiltshire is requested, for example Countess Road, for which the measurements appear very low. Please also confirm the rationale for choosing these locations – are they the nearest receptor to the project?

6.1.25 – This paragraph which purports to identify key locations where Nitrogen Dioxide annual mean objective is exceeded, makes no mention that the lower portion of Devizes Road is above the 40ug/m³ limit

6.1.29 – PM_{2.5} has not been considered. Levels of nitrogen dioxide at Masons Lane, Bradford on Avon, will be considered in the context of the hourly mean objective following the findings of the ASR 2017

6.1.50 – Clarification is needed on how it is proposed to dispose of tunnel spoil. If it is to be removed for off-site disposal, details on what will be done to prevent this traffic being routed through AQMA's is required

6.1.53 – As Council officers have not had sight of earlier air quality work, explanation and expansion of the statement that these have suggested no “significant” air quality impacts is required. The impact of the project on air quality will be considered by the Authority in the context of LAQM and the air quality objectives the Authority is obliged to work toward and any impact on achieving these

6.1.55 – The sensitive receptors should be identified, for agreement

6.1.62 – We would like to draw your attention to the AQS recent publications and CURED tool, which is more recent than IAN 175/13

<http://www.aqconsultants.co.uk/Resources/Download-Reports.aspx>

6.2.7 – Internal policy and advice documents should be mentioned here

6.2.11 – This should read: “the church of ~~St Leonards~~ St Mary and St Melor, Amesbury...and Buildings 455 and 456 (Five Aircraft Hangars), ~~Durrington Camp~~ Larkhill”.

6.2.12 – This should read: “(such as several Grade II and II* listed buildings situated in Larkhill)”.

6.2.14 – Please note the Amesbury Conservation Area is just Amesbury and not Amesbury Town Centre

6.2.19 – Impact on attributes of OUV should be included here

6.2.21 – Mitigation measures should be considered for built as well as archaeological assets, and therefore Wiltshire Council Conservation Officers should be engaged, where appropriate. This is as per 6.2.46

6.2.25 – This should make reference to the separate setting assessment which is being undertaken as part of the HIA for the OUV

6.2.27 – Upstanding archaeology should be mentioned here, not just that archaeology which is buried

6.2.29 – The list of values is not believed to be complete

Table 6.5 Guide to Assessing Heritage Value – This is not thought to be adequate enough for an area of such high heritage significance. For example, there is no mention of OUV, of group value or rarity etc.

6.2.47/8 – An assessment of the baseline affect / impact firstly unmitigated, and then with possible mitigation measures is required

6.2.5 Study Area – As there is a need to define the significance and extent of heritage assets prior to setting the boundary of the study area, we are concerned with this

approach. The study area for the HIA will need to take in the whole of the WHS and its setting and believe that this should be mentioned here

6.2.51 – It is believed that this list is incomplete and should be same as that contained within the archaeological evaluation strategy

6.2.52 – Please note that HMAG only acts within the WHS. Outside of the WHS, it is the Wiltshire Archaeology Service

6.3 Landscape and Visual – This chapter should integrate with the corresponding parts of the HIA for the WHS

6.3.10 – The following planning policies have been taken into account as part of the assessment relating to landscape and views:

d) Saved policies of the ~~North~~ Salisbury District Local Plan 2011 adopted in 2003, Saved Policy C6

6.5.4 – Please note that prior consent under the Control of Pollution Act has been discussed for use on this project

6.5.6 – The noise from the construction compound should be covered by any assessments carried out and subsequent control measures

6.5.9 – The following planning guidance and legislation have been taken into account as part of identifying the assessment methodology, receptor selection / sensitivity, potential significant environmental effects; and mitigation:

a) National Policy Statement for National Networks (Ref 3);

b) National Planning Policy Framework (Ref 8);

c) Noise Policy Statement for England (Ref 135); and

d) Web-based resource “Planning Practice Guidance on Noise” (PPG-N) (Ref 136)

e) Wiltshire Core Strategy, Core Policy 57 (see criterion vii)

6.5.17 – Details of the three Noise Important Areas in Amesbury have been requested

6.5.19 – Any additional haul roads should be included in the assessment of construction effects

6.5.49 – Details of all noise and vibration monitoring points have been requested

6.5.60 – Any properties requiring noise insulation works should be identified

6.5.64 – The wide seasonal variation in traffic flows should be identified in any average figures which may be produced

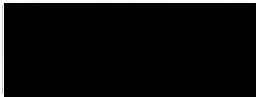
6.5.70 – Details of the methodology are yet to be specified, and should be subject to further discussions prior to approval

6.7.8/9 – The policy context appears to omit what would be a relevant development plan policy in the Wiltshire and Swindon Waste Core Strategy – policy WCS6 on Waste Reduction and Auditing, with particular regard to the Waste Audit

6.10.19 – As the proposed scheme area has been assessed as already being susceptible to surface water run-off and flooding, we are concerned about the proposed method of surface water disposal being infiltration.

If you would like any further information, please do not hesitate to contact us.

Yours sincerely,



Parvis Khansari
Director
Highways and Transport

Direct line: 01225 713340

Email: parvis.khansari@wiltshire.gov.uk

From: [Clerk](#)
To: [A303 Stonehenge](#)
Subject: RE: TR010025 - A303 Stonehenge – Amesbury to Berwick Down - EIA Scoping Notification and Consultation
Date: 20 November 2017 13:43:00

Dear sir,

Winterbourne Stoke Parish Council have reviewed the documentation and are broadly content with the proposals for the ES, but would like to lay down a marker that baseline meteorological data should be based on readings from Stonehenge or Larkhill and not RAF Lyneham as has been done in the past.

Regards

James Carr
Clerk, Winterbourne Stoke Parish Council

M: +44 7973 366762
E: clerk@winterbournestokepc.org.uk
<http://winterbournestokepc.org.uk/>

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LATE SCOPING CONSULTATION RESPONSES

Consultation bodies have 28 days to respond with any comments, stating either the information that they consider should be included in the ES or that they do not have any comments.

Any responses received after the deadline will not be considered within the scoping opinion but are forwarded to the applicant for consideration in accordance with the policy set out in Advice Note 7: Environmental Impact Assessment, Screening and Scoping.

The following EIA scoping consultation responses were received after the consultation deadline specified under legislation and therefore did not form part of the Secretary of State's scoping opinion.



Public Health
England

CRCE/NSIP Consultations
Chilton
Didcot
Oxfordshire OX11 0RQ

Nsipconsultations@phe.gov.uk
www.gov.uk/phe

Mr Richard Kent
Senior EIA and Land Rights Advisor
The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol BS1 6PN

Your Ref: TR10025-000031
Our Ref: CIRIS 40473

22nd November 2017

Dear Mr Kent

**Re: Scoping Consultation
Application for an Order Granting Development Consent for the proposed
A303 Stonehenge – Amesbury to Berwick Down**

Thank you for including Public Health England (PHE) in the scoping consultation phase of the above application. Our response focuses on health protection issues relating to chemicals and radiation. Advice offered by PHE is impartial and independent.

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the environmental statement (ES). We believe however that the summation of relevant public health issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements (NPS) and relevant guidance and standards should also be highlighted.

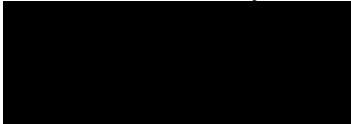
In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. Any assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal, therefore we accept that, in some circumstances particular assessments may not be relevant to an application, or that an assessment may be adequately completed using a qualitative rather than quantitative methodology. In cases where this decision is made, the promoters should fully explain and justify their rationale in the submitted documentation.

It is noted that the current proposals do not appear to consider possible public health impacts of Electric and Magnetic Fields (EMF). The proposer should confirm either that the proposed development does include or impact upon any potential sources of

EMF; or ensure that an adequate assessment of the possible impacts is undertaken and included in the ES.

The attached appendix outlines generic areas that should be addressed by all promoters when preparing ES for inclusion with an NSIP submission. We are happy to assist and discuss proposals further in the light of this advice.

Yours sincerely,



Allister Gittins
Environmental Public Health Scientist

nsipconsultations@phe.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

Appendix: PHE recommendations regarding the scoping document

General approach

The EIA should give consideration to best practice guidance such as the Government's Good Practice Guide for EIA¹. It is important that the EIA identifies and assesses the potential public health impacts of the activities at, and emissions from, the installation. Assessment should consider the development, operational, and decommissioning phases.

It is not PHE's role to undertake these assessments on behalf of promoters as this would conflict with PHE's role as an impartial and independent body.

Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, EIA should start at the stage of site and process selection, so that the environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered should be outlined in the ES².

The following text covers a range of issues that PHE would expect to be addressed by the promoter. However this list is not exhaustive and the onus is on the promoter to ensure that the relevant public health issues are identified and addressed. PHE's advice and recommendations carry no statutory weight and constitute non-binding guidance.

Receptors

The ES should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off-site human receptors may include people living in residential premises; people working in commercial, and industrial premises and people using transport infrastructure (such as roads and railways), recreational areas, and publicly-accessible land. Consideration should also be given to environmental receptors such as the surrounding land, watercourses, surface and groundwater, and drinking water supplies such as wells, boreholes and water abstraction points.

Impacts arising from construction and decommissioning

Any assessment of impacts arising from emissions due to construction and decommissioning should consider potential impacts on all receptors and describe monitoring and mitigation during these phases. Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.

We would expect the promoter to follow best practice guidance during all phases from construction to decommissioning to ensure appropriate measures are in place

¹ Environmental Impact Assessment: A guide to good practice and procedures - A consultation paper; 2006; Department for Communities and Local Government. Available from: <http://webarchive.nationalarchives.gov.uk/20100410180038/http://communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/>

² DCLG guidance, 1999 <http://www.communities.gov.uk/documents/planningandbuilding/pdf/155958.pdf>

to mitigate any potential impact on health from emissions (point source, fugitive and traffic-related). An effective Construction Environmental Management Plan (CEMP) (and Decommissioning Environmental Management Plan (DEMP)) will help provide reassurance that activities are well managed. The promoter should ensure that there are robust mechanisms in place to respond to any complaints of traffic-related pollution, during construction, operation, and decommissioning of the facility.

Emissions to air and water

Significant impacts are unlikely to arise from installations which employ Best Available Techniques (BAT) and which meet regulatory requirements concerning emission limits and design parameters. However, PHE has a number of comments regarding emissions in order that the EIA provides a comprehensive assessment of potential impacts.

When considering a baseline (of existing environmental quality) and in the assessment and future monitoring of impacts these:

- should include appropriate screening assessments and detailed dispersion modelling where this is screened as necessary
- should encompass all pollutants which may be emitted by the installation in combination with all pollutants arising from associated development and transport, ideally these should be considered in a single holistic assessment
- should consider the construction, operational, and decommissioning phases
- should consider the typical operational emissions and emissions from start-up, shut-down, abnormal operation and accidents when assessing potential impacts and include an assessment of worst-case impacts
- should fully account for fugitive emissions
- should include appropriate estimates of background levels
- should identify cumulative and incremental impacts (i.e. assess cumulative impacts from multiple sources), including those arising from associated development, other existing and proposed development in the local area, and new vehicle movements associated with the proposed development; associated transport emissions should include consideration of non-road impacts (i.e. rail, sea, and air)
- should include consideration of local authority, Environment Agency, Defra national network, and any other local site-specific sources of monitoring data
- should compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as UK Air Quality Standards and Objectives and Environmental Assessment Levels)
 - If no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (a Tolerable Daily Intake or equivalent). Further guidance is provided in Annex 1
 - This should consider all applicable routes of exposure e.g. include consideration of aspects such as the deposition of chemicals emitted to air and their uptake via ingestion
- should identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities) in the area(s) which may be affected by emissions, this should include consideration of any new receptors arising from future development

Whilst screening of impacts using qualitative methodologies is common practice (e.g. for impacts arising from fugitive emissions such as dust), where it is possible to undertake a quantitative assessment of impacts then this should be undertaken. PHE's view is that the EIA should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that standards, guideline values or health-based values will not be exceeded due to emissions from the installation, as described above. This should include consideration of any emitted pollutants for which there are no set emission limits. When assessing the potential impact of a proposed installation on environmental quality, predicted environmental concentrations should be compared to the permitted concentrations in the affected media; this should include both standards for short and long-term exposure.

Additional points specific to emissions to air

When considering a baseline (of existing air quality) and in the assessment and future monitoring of impacts these:

- should include consideration of impacts on existing areas of poor air quality e.g. existing or proposed local authority Air Quality Management Areas (AQMAs)
- should include modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst case conditions)
- should include modelling taking into account local topography

Additional points specific to emissions to water

When considering a baseline (of existing water quality) and in the assessment and future monitoring of impacts these:

- should include assessment of potential impacts on human health and not focus solely on ecological impacts
- should identify and consider all routes by which emissions may lead to population exposure (e.g. surface watercourses; recreational waters; sewers; geological routes etc.)
- should assess the potential off-site effects of emissions to groundwater (e.g. on aquifers used for drinking water) and surface water (used for drinking water abstraction) in terms of the potential for population exposure
- should include consideration of potential impacts on recreational users (e.g. from fishing, canoeing etc) alongside assessment of potential exposure via drinking water

Land quality

We would expect the promoter to provide details of any hazardous contamination present on site (including ground gas) as part of the site condition report.

Emissions to and from the ground should be considered in terms of the previous history of the site and the potential of the site, once operational, to give rise to issues. Public health impacts associated with ground contamination and/or the migration of material off-site should be assessed³ and the potential impact on nearby receptors and control and mitigation measures should be outlined.

³ Following the approach outlined in the section above dealing with emissions to air and water i.e. comparing predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as Soil Guideline Values)

Relevant areas outlined in the Government's Good Practice Guide for EIA include:

- effects associated with ground contamination that may already exist
- effects associated with the potential for polluting substances that are used (during construction / operation) to cause new ground contamination issues on a site, for example introducing / changing the source of contamination
- impacts associated with re-use of soils and waste soils, for example, re-use of site-sourced materials on-site or offsite, disposal of site-sourced materials offsite, importation of materials to the site, etc.

Waste

The EIA should demonstrate compliance with the waste hierarchy (e.g. with respect to re-use, recycling or recovery and disposal).

For wastes arising from the installation the EIA should consider:

- the implications and wider environmental and public health impacts of different waste disposal options
- disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated

Other aspects

Within the EIA PHE would expect to see information about how the promoter would respond to accidents with potential off-site emissions e.g. flooding or fires, spills, leaks or releases off-site. Assessment of accidents should: identify all potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; and identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.

The EIA should include consideration of the COMAH Regulations (Control of Major Accident Hazards) and the Major Accident Off-Site Emergency Plan (Management of Waste from Extractive Industries) (England and Wales) Regulations 2009: both in terms of their applicability to the installation itself, and the installation's potential to impact on, or be impacted by, any nearby installations themselves subject to the these Regulations.

There is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report⁴, jointly published by Liverpool John Moores University and the HPA, examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: "Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard. This is true even when the physical health risks may be negligible." PHE supports the inclusion of this information within EIAs as good practice.

⁴ Available from: <http://www.cph.org.uk/wp-content/uploads/2012/08/health-risk-perception-and-environmental-problems--summary-report.pdf>

Electromagnetic fields (EMF)

This statement is intended to support planning proposals involving electrical installations such as substations and connecting underground cables or overhead lines. PHE advice on the health effects of power frequency electric and magnetic fields is available in the following link:

<https://www.gov.uk/government/collections/electromagnetic-fields#low-frequency-electric-and-magnetic-fields>

There is a potential health impact associated with the electric and magnetic fields around substations, and power lines and cables. The field strength tends to reduce with distance from such equipment.

The following information provides a framework for considering the health impact associated with the electric and magnetic fields produced by the proposed development, including the direct and indirect effects of the electric and magnetic fields as indicated above.

Policy Measures for the Electricity Industry

The Department of Energy and Climate Change has published a voluntary code of practice which sets out key principles for complying with the ICNIRP guidelines:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37447/1256-code-practice-emf-public-exp-guidelines.pdf

Companion codes of practice dealing with optimum phasing of high voltage power lines and aspects of the guidelines that relate to indirect effects are also available:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48309/1255-code-practice-optimum-phasing-power-lines.pdf

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224766/powerlines_vcop_microshocks.pdf

Exposure Guidelines

PHE recommends the adoption in the UK of the EMF exposure guidelines published by the International Commission on Non-ionizing Radiation Protection (ICNIRP). Formal advice to this effect was published by one of PHE's predecessor organisations (NRPB) in 2004 based on an accompanying comprehensive review of the scientific evidence:-

<http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Publications/Radiation/NPRBArchive/DocumentsOfTheNRPB/Absd1502/>

Updates to the ICNIRP guidelines for static fields have been issued in 2009 and for low frequency fields in 2010. However, Government policy is that the ICNIRP

guidelines are implemented in line with the terms of the 1999 EU Council Recommendation on limiting exposure of the general public (1999/519/EC):

http://webarchive.nationalarchives.gov.uk/+www.dh.gov.uk/en/Publichealth/Healthprotection/DH_4089500

Static magnetic fields

For static magnetic fields, the ICNIRP guidelines published in 2009 recommend that acute exposure of the general public should not exceed 400 mT (millitesla), for any part of the body, although the previously recommended value of 40 mT is the value used in the Council Recommendation. However, because of potential indirect adverse effects, ICNIRP recognises that practical policies need to be implemented to prevent inadvertent harmful exposure of people with implanted electronic medical devices and implants containing ferromagnetic materials, and injuries due to flying ferromagnetic objects, and these considerations can lead to much lower restrictions, such as 0.5 mT.

Power frequency electric and magnetic fields

At 50 Hz, the known direct effects include those of induced currents in the body on the central nervous system (CNS) and indirect effects include the risk of painful spark discharge on contact with metal objects exposed to the field. The ICNIRP guidelines published in 1998 give reference levels for public exposure to 50 Hz electric and magnetic fields, and these are respectively 5 kV m⁻¹ (kilovolts per metre) and 100 µT (microtesla). The reference level for magnetic fields changes to 200 µT in the revised (ICNIRP 2010) guidelines because of new basic restrictions based on induced electric fields inside the body, rather than induced current density. If people are not exposed to field strengths above these levels, direct effects on the CNS should be avoided and indirect effects such as the risk of painful spark discharge will be small. The reference levels are not in themselves limits but provide guidance for assessing compliance with the basic restrictions and reducing the risk of indirect effects.

Long term effects

There is concern about the possible effects of long-term exposure to electromagnetic fields, including possible carcinogenic effects at levels much lower than those given in the ICNIRP guidelines. In the NRPB advice issued in 2004, it was concluded that the studies that suggest health effects, including those concerning childhood leukaemia, could not be used to derive quantitative guidance on restricting exposure. However, the results of these studies represented uncertainty in the underlying evidence base, and taken together with people's concerns, provided a basis for providing an additional recommendation for Government to consider the need for further precautionary measures, particularly with respect to the exposure of children to power frequency magnetic fields.

The Stakeholder Advisory Group on ELF EMFs (SAGE)

SAGE was set up to explore the implications for a precautionary approach to extremely low frequency electric and magnetic fields (ELF EMFs), and to make practical recommendations to Government:

<http://www.emfs.info/policy/sage/>

SAGE issued its First Interim Assessment in 2007, making several recommendations concerning high voltage power lines. Government supported the implantation of low cost options such as optimal phasing to reduce exposure; however it did not support the option of creating corridors around power lines on health grounds, which was considered to be a disproportionate measure given the evidence base on the potential long term health risks arising from exposure. The Government response to SAGE's First Interim Assessment is available here:

http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_107124

The Government also supported calls for providing more information on power frequency electric and magnetic fields, which is available on the PHE web pages (see first link above).

Ionising radiation

Particular considerations apply when an application involves the possibility of exposure to ionising radiation. In such cases it is important that the basic principles of radiation protection recommended by the International Commission on Radiological Protection⁵ (ICRP) are followed. PHE provides advice on the application of these recommendations in the UK. The ICRP recommendations are implemented in the Euratom Basic Safety Standards⁶ (BSS) and these form the basis for UK legislation, including the Ionising Radiation Regulations 1999, the Radioactive Substances Act 1993, and the Environmental Permitting Regulations 2016.

PHE expects promoters to carry out the necessary radiological impact assessments to demonstrate compliance with UK legislation and the principles of radiation protection. This should be set out clearly in a separate section or report and should not require any further analysis by PHE. In particular, the important principles of justification, optimisation and radiation dose limitation should be addressed. In addition compliance with the Euratom BSS and UK legislation should be clear.

When considering the radiological impact of routine discharges of radionuclides to the environment PHE would expect to see a full radiation dose assessment considering both individual and collective (population) doses for the public and, where necessary, workers. For individual doses, consideration should be given to

⁵ These recommendations are given in publications of the ICRP notably publications 90 and 103 see the website at <http://www.icrp.org/>

⁶ Council Directive 96/29/EURATOM laying down basic safety standards for the protection of the health of workers and the general public against the dangers arising from ionising radiation.

those members of the public who are likely to receive the highest exposures (referred to as the representative person, which is equivalent to the previous term, critical group). Different age groups should be considered as appropriate and should normally include adults, 1 year old and 10 year old children. In particular situations doses to the fetus should also be calculated⁷. The estimated doses to the representative person should be compared to the appropriate radiation dose criteria (dose constraints and dose limits), taking account of other releases of radionuclides from nearby locations as appropriate. Collective doses should also be considered for the UK, European and world populations where appropriate. The methods for assessing individual and collective radiation doses should follow the guidance given in 'Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012'⁸. It is important that the methods used in any radiological dose assessment are clear and that key parameter values and assumptions are given (for example, the location of the representative persons, habit data and models used in the assessment).

Any radiological impact assessment should also consider the possibility of short-term planned releases and the potential for accidental releases of radionuclides to the environment. This can be done by referring to compliance with the Ionising Radiation Regulations and other relevant legislation and guidance.

The radiological impact of any solid waste storage and disposal should also be addressed in the assessment to ensure that this complies with UK practice and legislation; information should be provided on the category of waste involved (e.g. very low level waste, VLLW). It is also important that the radiological impact associated with the decommissioning of the site is addressed. Of relevance here is PHE advice on radiological criteria and assessments for land-based solid waste disposal facilities⁹. PHE advises that assessments of radiological impact during the operational phase should be performed in the same way as for any site authorised to discharge radioactive waste. PHE also advises that assessments of radiological impact during the post operational phase of the facility should consider long timescales (possibly in excess of 10,000 years) that are appropriate to the long-lived nature of the radionuclides in the waste, some of which may have half-lives of millions of years. The radiological assessment should consider exposure of members of hypothetical representative groups for a number of scenarios including the expected migration of radionuclides from the facility, and inadvertent intrusion into the facility once institutional control has ceased. For scenarios where the probability of occurrence can be estimated, both doses and health risks should be presented, where the health risk is the product of the probability that the scenario occurs, the dose if the scenario occurs and the health risk corresponding to unit dose. For inadvertent intrusion, the dose if the intrusion occurs should be presented.

⁷ HPA (2008) Guidance on the application of dose coefficients for the embryo, fetus and breastfed infant in dose assessments for members of the public. Doc HPA, RCE-5, 1-78, available at <https://www.gov.uk/government/publications/embryo-fetus-and-breastfed-infant-application-of-dose-coefficients>

⁸ The Environment Agency (EA), Scottish Environment Protection Agency (SEPA), Northern Ireland Environment Agency, Health Protection Agency and the Food Standards Agency (FSA). Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/296390/geho1202bklh-e-e.pdf

⁹ HPA RCE-8, Radiological Protection Objectives for the Land-based Disposal of Solid Radioactive Wastes, February 2009

It is recommended that the post-closure phase be considered as a series of timescales, with the approach changing from more quantitative to more qualitative as times further in the future are considered. The level of detail and sophistication in the modelling should also reflect the level of hazard presented by the waste. The uncertainty due to the long timescales means that the concept of collective dose has very limited use, although estimates of collective dose from the 'expected' migration scenario can be used to compare the relatively early impacts from some disposal options if required.

Annex 1

Human health risk assessment (chemical pollutants)

The points below are cross-cutting and should be considered when undertaking a human health risk assessment:

- The promoter should consider including Chemical Abstract Service (CAS) numbers alongside chemical names, where referenced in the ES
- Where available, the most recent United Kingdom standards for the appropriate media (e.g. air, water, and/or soil) and health-based guideline values should be used when quantifying the risk to human health from chemical pollutants. Where UK standards or guideline values are not available, those recommended by the European Union or World Health Organisation can be used
- When assessing the human health risk of a chemical emitted from a facility or operation, the background exposure to the chemical from other sources should be taken into account
- When quantitatively assessing the health risk of genotoxic and carcinogenic chemical pollutants PHE does not favour the use of mathematical models to extrapolate from high dose levels used in animal carcinogenicity studies to well below the observed region of a dose-response relationship. When only animal data are available, we recommend that the 'Margin of Exposure' (MOE) approach¹⁰ is used

¹⁰ Benford D et al. 2010. Application of the margin of exposure approach to substances in food that are genotoxic and carcinogenic. Food Chem Toxicol 48 Suppl 1: S2-24

Chapters 1-4 (refer to ES topic chapters 5 to 16 for response to respective Scoping Opinion Paragraphs)

Scoping Opinion Paragraph	Subject	Scoping Opinion	Response	Location in the Application Documents
1.1.10 – 1.1.11	EIA Regulations	Regulation 10(3) of the EIA Regulations states that a request for a scoping opinion must include: (a) a plan sufficient to identify the land; (b) a description of the proposed development, including its location and technical capacity; (c) an explanation of the likely significant effects of the development on the environment; and (d) such other information or representations as the person making the request may wish to provide or make. The Inspectorate considers that this has been provided in the Scoping Report. The Inspectorate is satisfied that the Scoping Report encompasses the relevant aspects identified in the EIA Regulations.	Noted.	N/A
1.2.1 – 1.2.2	EIA Regulations	In accordance with Regulation 10(6) of the EIA Regulations the Inspectorate has consulted the consultation bodies before adopting a scoping opinion. A list of the consultation bodies formally consulted by the Inspectorate is provided at Appendix 1. The consultation bodies have been notified under Regulation 11(1)(a) of the duty imposed on them by Regulation 11(3) of the EIA Regulations to make information available to the Applicant relevant to the preparation of the ES. The Applicant should note that whilst the list can inform their consultation, it should not be relied upon for that purpose. The list of respondents who replied within the statutory timeframe and whose comments have been taken into account in the preparation of this Opinion is provided, along with copies of their comments, at Appendix 2, to which the Applicant should refer in undertaking the EIA.	The Applicant has reviewed the list but has not relied solely on it in undertaking the EIA. The “A303 Stonehenge: Amesbury to Berwick Down Consultation Report 2018” should be consulted for details of consultation.	N/A
1.2.3	Consultation responses	The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.	The Applicant has reviewed and considered all of the comments. Together this table and the topic chapter scoping opinion response tables make reference to all consultation body comments and respond to them in turn.	This Table and ES Topic Chapters (document reference 6.1).
1.2.4	Consultation responses	Any consultation responses received after the statutory deadline for receipt of comments will not be taken into account within this Opinion. Late responses will be forwarded to the Applicant and will be made available on the Inspectorate's website. The Applicant should also give due consideration to those comments in carrying out the EIA.	The applicant has reviewed and taken into account the late comments, which include only those from Public Health England. These comments are addressed in this table and also the topic chapter scoping opinion response tables.	This Table and ES Topic Chapters (document reference 6.1).
2.3.1	Description of Proposed Development	The Scoping Report provides an in depth description of the Proposed Development including the location of the main components. Section 2.4 of the Scoping Report divides the Proposed development into “Western”, “Central” and “Eastern” sections and it would aid the reader if these definitions were more clearly defined on Figure 2.1 improving consistency with the written text.	The ES is supported by a set of design plans which clearly annotate each design element of the proposed scheme. The body of the ES refers to the design elements as they are represented on the design plans.	ES Chapter 2 The Scheme (document reference 6.1).
2.3.2	Description of Proposed Development	The Applicant makes reference to areas of ongoing work in determining the design and approach to construction including, for example, the locations of material stockpiling areas, construction compounds and haul roads. Such areas should be defined, described and assessed as part of the ES and should be clearly labelled on accompanying figures. The Inspectorate notes the reference to satellite compounds potentially being “in close proximity” to the scheme footprint, and for clarity, expects that all such compounds are identified within the defined redline boundary and identified on the accompanying works plans and assessed as part of the ES. The assessment of relevant aspects should account for any flexibility around potentially multiple options sought by the Applicant for the location of such areas.	The locations of construction compounds are identified in ES Chapter 2 (Figure 2.7), which includes the Scheme boundary. The locations of stockpiling areas and haul routes are also detailed. Such areas are described in Chapter 2 (The Scheme) of the ES and assessed within appropriate topic chapters. This ES and the assessments within it are based on the works proposed in the DCO works plans and engineering sections and the maximum area of land anticipated as likely to be required, taking into account the proposed limits of deviation (LoD) for the Scheme (summarised in ES Chapter 2, Table 2.1) and the flexibility of detailed design provided for in the DCO. The LoD are all within the Scheme boundary included in the DCO submission. The assessments therefore take into consideration what can be regarded as a realistic ‘worst case’ assessment of the impacts associated with the Scheme.	ES Chapter 2 The Scheme, including ES Figure 2.7 (document reference 6.1 and 6.2).
2.3.3	Description of Proposed Development	The Scoping Report provides a broad description of the key components of the Proposed Development. However, it does not provide specific information regarding details of the Proposed Development for example; the lengths of each road section, the anticipated depth of tunnel boring, the likely design specification for viaduct over the River Till or any detail around the size and extent of the portals at the eastern and western ends of tunnelled section. The ES should be clear in providing specific information on these points of design and ensure that the assessment is consistent with the specifications within the DCO. Equally, the ES should be specific in describing the existing roads that are to be stopped up,	The ES and the Environmental Masterplan (Figure 2.5) includes the level of detail suggested, and details of the works identified are set out in the various plans accompanying the application, including the general arrangement drawings. The indicative scheme is also described in Chapter 2.	ES Chapter 2 (document reference 6.1); ES Figure 2.5 (document reference 6.2); General Arrangement

Scoping Opinion Paragraph	Subject	Scoping Opinion	Response	Location in the Application Documents
		detrunked or otherwise modified as a result of the Proposed Development, including those that are to be made into “green byways”. This information should also be depicted on figures in the ES to provide further clarity for the reader.		drawings (document reference 2.9)
2.3.4	Description of Proposed Development	The ES should assess impacts associated with any temporary/permanent above ground structures particularly where they could be located within the WHS, for example ventilation shafts, access portals, bunds / other earthworks or tunnel service and/or control buildings.	The ES assess impacts associated with any temporary/permanent above ground structures particularly, including where located within the WHS. This assessment is presented throughout the ES, including in ES Chapter 6, Cultural Heritage, and ES Chapter 7, Landscape and Visual.	ES Chapter 6 ES Chapter 7 (document reference 6.1, 6.2 and 6.3).
2.3.5	Description of Proposed Development	The Scoping Report purposely omits any detailed description of the nature and quantity of the materials used and waste generated due to the fact they will be included in the later design development process. The ES should include these details as part of the description of the Proposed Development and include justification of any key assumptions made. The ES should also assess any impacts associated and take into account opportunities to re-use of tunnel spoil as alluded to at paragraph 6.7.22 of the Scoping Report.	The ES includes descriptions and approximate quantities each of these materials and assesses the likely impacts and the various options for management of them. This assessment is presented in ES Chapter 12 Material Assets and Waste.	ES Chapter 12 (document reference 6.1).
2.3.6	Description of Proposed Development	Paragraph 2.4.20 of the Scoping Report explains it is “likely” that a tunnel boring machine (TBM) would be used in the construction of the tunnelled section. Paragraph 6.7.22 of the Scoping Report also refers to uncertainty as to the type of tunnelling method to be used, although no specific references are made to any alternative tunnelling construction methods and the ES should account for any potential options that are being considered as part of the design of the Proposed Development. Section 3.3.2 states that “Tunnel technology” is being developed as part of the scheme design through autumn and winter 2017, but it is unclear if this relates to the methods of tunnelling or technology within the operational tunnel (or both).	The reference was to tunnel boring technology. It is anticipated that a TBM will be used in the construction of the tunnelled section of the scheme, though the exact specifications of this will be decided by the main works contractor at detailed design. Information about the tunnel construction, including the use of a TBM, is given in ES Chapter 2, The Proposed Scheme.	ES Chapter 2 (document reference 6.1).
2.3.7 – 2.3.8	Description of Proposed Development	The Applicant seeks to scope out any assessment of “demolition after design life” of the Proposed Development as part of the EIA given that “It is considered highly unlikely that the proposed Scheme would be demolished after its design life” (Paragraph 5.4.3 of the Scoping Report). The Inspectorate interprets this reference to be akin to “decommissioning” of the Proposed Development. The Inspectorate considers that this is a reasonable approach taking into account the specific characteristics of the Proposed Development. However, the Inspectorate considers that any decommissioning associated with dismantling and replacing particular elements of the Proposed Development (e.g. lighting columns) once they reach the end of their design life should be assessed if significant effects are likely to occur (and the design life should be specifically defined).	The built scheme will be operated and maintained, which will include the ‘decommissioning’ of certain elements of the scheme (ES Section 2.6), for example lighting columns, in-line with a Handover Environmental Management Plan (HEMP) which will be prepared by the construction contractor prior to the operation phase. No likely significant effects are predicted.	ES Chapter 2 (document reference 6.1).
2.3.9	Description of Proposed Development	Section 3.3.2 of the Scoping Report makes reference to elements of the design including “Enhancement and compensation areas”. The Inspectorate notes reference to these terms being included as part of a “mitigation hierarchy” in paragraph 5.4.15 of the Scoping Report. Further comments on these points are considered in section 4 of this Scoping Opinion (as applicable). The Inspectorate expects the description of such areas to be clearly distinguishable by type, that which is compensation and that which is enhancement. The ES should explain the extent to which these areas are relied upon in determining the likely significant environmental effects and how any such measures would be secured and delivered.	The approach to mitigation, including the definitions of different types of mitigation, is described in ES Chapter 4, Environmental Assessment Methodology. The mechanisms for securing and delivering these measures are outlined in ES sections 2.3.58 – 2.3.61 and are detailed in the Environmental Mitigation Schedule (EMS), Appendix 2.1, and the Outline Environmental Mitigation Plan (OEMP), Appendix 2.2.	ES Chapter 4 ES Appendices 2.1 and 2.2 (document reference 6.1 and 6.3).
2.3.10	Alternatives	The EIA Regulations require that the Applicant provide ‘A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects’.	Chapter 3 of the ES includes an assessment of the alternatives in accordance with the EIA Regulations.	ES Chapter 3 (document reference 6.1)
2.3.11 – 2.3.12	Alternatives	Section 3.2, Figure 3.1 and Table 3.1 of the Scoping Report describe the process of options identification undertaken by the Applicant to date, including consideration of 60 route options grouped into seven separate route corridors. The ES should include a discrete section that provides details of the alternatives considered and the reasons leading to the chosen option(s), including a comparison of the environmental effects.	Chapter 3 of the ES includes an assessment of the alternatives in accordance with the EIA Regulations.	ES Chapter 3 (document reference 6.1)
2.3.13	Rochdale Envelope	The Inspectorate’s Advice Note 9 ‘Using the Rochdale Envelope’ provides additional details on the recommended approach. The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different Proposed Development. The development parameters will need to be clearly defined in the draft DCO (dDCO) and therefore in the accompanying ES. It is a point for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range	Chapter 2 of the ES sets out how the ES has assessed the development parameters applied for in the DCO and describes the approach to assessment.	ES Chapter 2 (document reference 6.1)

Scoping Opinion Paragraph	Subject	Scoping Opinion	Response	Location in the Application Documents
		of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations. It should be noted that if the Proposed Development changes substantially during the EIA process and prior to submission of the application the Applicant may wish to consider requesting a new scoping opinion.		
3.1.1 – 3.1.2	EIA Approach	This section contains the Inspectorate's specific comments on the scope, and level of detail of information to be provided in the Applicant's ES. General advice on the presentation of an ES is provided in the Inspectorate's Advice Note 7 'Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping'3 and associated appendices. Aspects are not scoped out unless specifically addressed and justified by the Applicant, and confirmed as being scoped out by the Inspectorate. The ES should be based on the Scoping Opinion in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report. The Inspectorate has set out in this Opinion where it has/has not agreed to scope out certain aspects or matters on the basis of the information available at this time. The Inspectorate is content that this should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such aspects/matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.	This scoping opinion response table and the scoping opinion response tables contained within each of the ES topic chapters includes a response from The Applicant to all of the comments raised in the scoping opinion, both from The Inspectorate and the statutory consultees. Where topics (or more likely parts of topics) have been scoped out or a scoping opinion comments departed from, the reason for this has been clearly set out and details of engagement and agreement with relevant statutory consultees demonstrated.	This table and the topic chapter scoping opinion response tables (document reference 6.1).
3.1.3	EIA Approach	Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/minimise adverse effects is secured through DCO requirements (or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.	The approach to mitigation, including the definitions of different types of mitigation, is described in ES Chapter 4 Environmental Assessment Methodology. The mechanisms for securing and delivering these measures are outlined in ES sections 2.3.58 – 2.3.61, and are detailed in the Environmental Mitigation Schedule (EMS), Appendix 2.1, and the Outline Environmental Mitigation Plan (OEMP), Appendix 2.2.	ES Chapter 2 and Chapter 4 (document reference 6.1) ES Appendices 2.1 and 2.2 (document reference 6.3).
3.2.1 – 3.2.2	EIA Approach	Sector-specific NPSs are produced by the relevant Government Departments and set out national policy for NSIPs. They provide the framework within which the Examining Authority (ExA) will make their recommendations to the SoS and include the Government's objectives for the development of NSIPs. The NPSs may include environmental requirements for NSIPs, which Applicants should address within their ES. The designated NPS relevant to the National Networks sector is the National Networks NPS (NPSNN).	Each ES topic chapter includes a short table demonstrating how specific NPSNN requirements of relevant to that topic assessment have been met. Full details of NPSNN requirements and how they have been addressed through the EIA are captured in the NPSNN Assurance Tables contained within the Case for the Scheme (doc ref 7.1).	ES Topic Chapters (document reference 6.1) Document reference 7.1.
3.3.1	EIA Approach	The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables: <ul style="list-style-type: none"> · To demonstrate how the assessment has taken account of this Opinion; · To identify and collate the residual effects after mitigation for each of the specialist aspect chapters, including matters relevant to interrelationships and cumulative effects; · To set out the proposed mitigation and/or monitoring measures including cross-reference to the means of securing such measures (e.g. a DCO requirement); · To describe any remedial measures that are identified as being necessary following monitoring; and · To identify where details in the HRA report (where relevant), such as descriptions of European sites and their locations, together with any mitigation or compensation measures, are to be found in the ES. 	<p>This scoping opinion response table and the topic specific response tables found in each topic chapter demonstrate how the assessment has taken account of the scoping opinion. Where topics (or more likely parts of topics) have been scoped out or a scoping opinion comment departed from, the reason for this has been clearly set out and details of engagement and agreement with relevant statutory consultees demonstrated.</p> <p>Each topic chapter includes a collated table of likely significant residual effects.</p> <p>The approach to mitigation, including the definitions of different types of mitigation, is described in ES Chapter 4, Environmental Assessment Methodology. The mechanisms for securing and delivering these measures are outlined in ES sections 2.3.58 – 2.3.61, and are detailed in tables in the Environmental Mitigation Schedule (EMS), Appendix 2.1, and the Outline Environmental Mitigation Plan (OEMP), Appendix 2.2.</p> <p>The Habitats Regulations Assessment (HRA) forms an appendix for the biodiversity</p>	<p>ES Topic Chapters</p> <p>ES Chapter 4</p> <p>ES Appendices 2.1 and 2.2</p> <p>ES Appendices 8.24 and 8.25</p> <p>(document reference 6.1 and 6.3)</p>

Scoping Opinion Paragraph	Subject	Scoping Opinion	Response	Location in the Application Documents
			Chapter, Appendices 8.24, Likely Significant Effects Report, and 8.25 Statement to Inform Appropriate Assessment.	
3.3.1	EIA Approach	The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.	Each technical chapter in the ES includes a section on 'assumptions and limitations'.	ES Topic Chapters (document reference 6.1).
3.3.3	EIA Approach	The Inspectorate considers that where a DCO application includes works described as 'associated development', that could themselves be defined as an improvement of a highway, the Applicant should ensure that the ES accompanying that application distinguishes between; effects that primarily derive from the integral works which form the proposed (or part of the proposed) NSIP and those that primarily derive from the works described as associated development, for example through a suitably compiled summary table. This will have the benefit of giving greater confidence to the Inspectorate that what is proposed is not in fact an additional NSIP defined in accordance with s22 of the PA2008.	The ES assesses effects from the works which form the Scheme as listed in Schedule 1 (authorised development) of the draft DCO ([Volume 3, Document Ref 3.1]). There is no associated development that could be defined as an additional NSIP as defined by s22 of the Planning Act 2008. The Explanatory Memorandum ([Volume 3, Document Ref 3.2]) sets out the Scheme's qualification as an NSIP.	Draft DCO (document reference 3.1).
3.3.4	EIA Approach	Section 5 of the Scoping Report outlines the general approach to the proposed assessment as being in accordance with the Design Manual for Roads and Bridges (DMRB) and accompanying Interim Advice Notes (IANs).	This approach has been carried through to the ES: see ES chapter 4 (Environmental Assessment Methodology) and the topic chapters.	ES Chapter 4 and ES Topic Chapters (document reference 6.1).
3.3.5	EIA Approach	The ES should clearly demonstrate that impacts as a result of the whole development have been assessed. For example, the DCO may provide for works on diversionary routes and high load routes and the ES will need to assess the anticipated volumes of traffic and its management including frequencies of expected use of these routes.	Impacts as a result of the whole development have been assessed, as described in ES Chapter 2, The Proposed Scheme. In relation to diversionary and high load routes, as discussed with The Inspectorate at a post-Scoping Opinion meeting on January 30 th 2018, these have not been subject to detailed assessment as it is clear that they will be seldom used and as such traffic will not result in likely significant effects.	ES Chapter 2 (document reference 6.1).
3.3.6	EIA Approach	The description of the Proposed Development includes the retention of the current A303 for local traffic to some extent. The proposed approach to the ES does not appear to set out specific assessment of the impact of the two roads being in use simultaneously, or the spatial / temporal extent of the retained A303. This assessment will be required in the ES.	The proposed scheme does include the retention of some parts of the existing A303, which will be down-graded as required to meet the requirements of the local context. These works are considered in the ES: see e.g. Chapter 2. The traffic model has considered the use of the operational scheme and the retained sections of the current alignment. This model has informed the air quality and noise assessments, as set out in ES Chapters 5 and 9, respectively.	ES Chapter 5 and 9 (document reference 6.1).
3.3.7 – 3.3.8	EIA Approach	The ES should include a description of the baseline scenario with and without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge. The ES should provide a clear description of the baseline particularly in respect of the existing road network that is to be affected. This is essential to the accurate assessment of the Proposed Development's effects, particularly in respect of roads that are to be stopped up, detrunked and / or made into "green byways".	Each of the topic chapters presents a clear baseline with and without implementation of the development. The Applicant understands that a clear baseline is essential to the accurate assessment of the Proposed Development.	ES Topic Chapters (document reference 6.1).
3.3.9	EIA Approach	The ES should contain the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each technical chapter.	Timescales for the surveys undertaken as part of the EIA and those which underpin the technical assessments are included in each of the topic chapters.	ES Topic Chapters (document reference 6.1).
3.3.10	EIA Approach	The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the EIA, which clearly states which effects are 'significant' and 'non-significant' for the purposes of the EIA.	The overarching methodology for the EIA is set out in ES Chapter 4, Environmental Assessment Methodology.	ES Chapter 4 (document reference 6.1).
3.3.11	Residues and emissions	The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the aspect assessments.	Information on type and quantity of residues and emissions is included in but split between the various technical chapters, where that residue or emission is of relevance to a technical chapter's assessment.	ES Topic Chapters (document reference 6.1).
3.3.12	Mitigation	Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured ideally with reference to specific DCO requirements or other legally binding agreements.	The approach to mitigation, including the definitions of different types of mitigation, is described in ES Chapter 4, Environmental Assessment Methodology. The mechanisms for securing and delivering these measures are outlined in ES sections 2.3.58 – 2.3.61, the ES topic chapters, the Environmental Mitigation Schedule (EMS), Appendix 2.1, and the Outline Environmental Mitigation Plan (OEMP), Appendix 2.2.	ES Chapter 4 ES topic chapters ES Appendices 2.1 and 2.2

Scoping Opinion Paragraph	Subject	Scoping Opinion	Response	Location in the Application Documents
				(document reference 6.1 and 6.3).
3.2.19 – 3.3.21	Transboundary effects	Schedule 4 part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The Inspectorate notes that the Applicant has/has not indicated in the Scoping Report whether the Proposed Development is likely to have significant impacts on another European Economic Area (EEA) State. Regulation 32 of the EIA Regulations inter alia requires the Inspectorate to publicise a DCO application on behalf of the SoS if it is of the view that the proposal is likely to have significant effects on the environment of another EEA state, and where relevant, to consult with the EEA state affected. Appendix A of the Scoping Report presents the Applicant's screening matrix for the consideration of "Possible Substantial Effects on the Environment of another EEA State" citing EIA Regulation 32 and the Inspectorate's AN12. The Inspectorate expects the ES to specifically identify whether, in the view of the Applicant, the Proposed Development has the potential for significant transboundary effects and if so, what these are and which EEA States would be affected.	Appendix A of the Scoping Report, Transboundary Effects Screening matrix, provided justification for the scoping out of Transboundary Effects. A summary of this scoping out is set out in ES Chapter 15 Assessment of Cumulative Effects. For the avoidance of doubt, the view of the Applicant is that the Scheme does not have the potential for likely significant transboundary effects and so no EEA States would be affected.	ES Chapter 15 (document reference 6.1).
3.3.22	Reference list	A reference list detailing the sources used for the descriptions and assessments must be included in the ES.	The reference list is included in the 'References' section of the ES.	ES 'References' section (document reference 6.1).
Wiltshire Council	Methodology	6.2.47/8 – An assessment of the baseline affect / impact firstly unmitigated, and then with possible mitigation measures is required	Agreed. This is how the EIA has been undertaken; see ES Chapter 4, Environmental Assessment Methodology, for overview of EIA methodology.	ES Chapter 4 (document reference 6.1).
Wiltshire Council	Planning	6.2.7 – Internal policy and advice documents should be mentioned here	Noted and agreed. The legislative and policy context of the scheme is set out in ES Chapter 1, Introduction. Legislation, policy and guidance specifically relevant to cultural heritage is set out in ES Section 6.2 Legislative Policy and Framework.	ES Chapter 1 ES Section 6.2 (document reference 6.1).
Wiltshire Council	Planning	6.3.10 – The following planning policies have been taken into account as part of the assessment relating to landscape and views: d) Saved policies of the North Salisbury District Local Plan 2011 adopted in 2003, Saved Policy C6	Noted and agreed. The legislative and policy context of the scheme is set out in ES Chapter 1 Introduction.	ES Chapter 1 (document reference 6.1).
Wiltshire Council	Proposed Scheme	2.4.13 – Wording should be amended to state "of at least" 2.9 km	The tunnel is "approximately 3.3km in length" as described in ES Chapter 2, The Scheme.	ES Chapter 2 (document reference 6.1).
Late Response: PHE	EIA Methodology	The EIA should give consideration to best practice guidance such as the Government's Good Practice Guide for EIA. It is important that the EIA identifies and assesses the potential public health impacts of the activities at, and emissions from, the installation. Assessment should consider the development, operational, and decommissioning phases	The EIA has been undertaken in accordance with the EIA Regulations. The potential for impacts relating to public health are considered as part of the People and Communities assessment, see ES Chapter 13.	ES Chapter 13 (document reference 6.1).
Late Response: PHE	Alternatives	Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, EIA should start at the stage of site and process selection, so that the environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered should be outlined in the ES2	Chapter 3 of the ES includes an assessment of the alternatives in accordance with the EIA Regulations.	ES Chapter 3 (document reference 6.1).
Late Response: PHE	Impacts arising from construction and decommissioning	Any assessment of impacts arising from emissions due to construction and decommissioning should consider potential impacts on all receptors and describe monitoring and mitigation during these phases. Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.	The EIA has included a detailed assessment of construction effects, including in relation to emissions. As agreed with The Inspectorate through the Scoping Opinion, if no significant effects are anticipated to arise from the planned 'decommissioning' of Scheme elements (e.g. lighting columns) (ES Section 2.6), it is reasonable for decommissioning to be scoped out of the assessment. As no likely significant effects are predicted, the Applicant has scoped out decommissioning of the Proposed Development from the assessment.	ES Chapter 2 (document reference 6.1).

Major Events

Scoping Opinion Paragraph	Subject	Scoping Opinion	A303 Stonehenge Response	Environmental Statement Reference
3.3.13	EIA MAD Requirements	The ES should include a description of the potential vulnerability of the Proposed Development to risks of major accidents and/or disasters, including the vulnerability to climate change, which are relevant to the Proposed Development. Relevant information available and obtained through risk assessments pursuant to European Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.	The Major Events section of the ES and accompanying table, as set out in ES Chapter 4, includes a descriptions of vulnerability of the Proposed Development to risks of major accidents and/or disasters, including the vulnerability to climate change. This table includes measures to prevent and mitigate the effects.	ES Chapter 4 (document reference 6.1).
3.3.14	HE MPI Guidance	Section 5.7 of the Scoping Report sets out how the Applicant intends to approach the assessment of major accidents in the ES. This includes reference to a document entitled Major Projects Instructions guidance document (reference MPI-57-052017). The Inspectorate has not been able to locate this document and it does not appear to be readily available. The ES should clearly explain the assessment methodology, if specific guidance documents are relied upon and are necessary to understand the approach taken, they should be readily available or provided with the ES.	The methodology for assessing Major Events is set out in ES Chapter 4, Environmental Assessment Methodology	ES Chapter 4 (document reference 6.1).
3.3.15 - 3.3.16	Project as source and receptor of ME	For the avoidance of doubt, and although not specifically cited at paragraph 5.7.3 of the Scoping Report, the Applicant should assess the potential for significant effects (during construction and operation) of major accidents and disasters that: (1) Could result in impacts upon the Proposed Development (eg wildfires, flooding); or (2) Could occur as a consequence of the Proposed Development (eg tunnel failure / collapse). The Inspectorate recognises, and is generally satisfied that the Applicant's approach (Table 5.5 of the Scoping Report) is inclusive of both types.	The Major Events section of the ES and accompanying table, as set out in ES Chapter 4, sets out that the Proposed Development has been considered as being both a source and a receptor of major events, and that, where appropriate, these potential events are considered in relevant topic chapters.	ES Chapter 4 (document reference 6.1).
3.3.17	Reporting of ME in table 5.5	The Scoping Report explains that the assessment of major accidents and disasters will be presented in relevant ES aspect chapters and concludes that, "it is highly likely" the events identified in Table 5.5 will influence the design such that there is no real risk of a likely significant effect occurring. However, the Inspectorate considers the ES should include an assessment of the likely significant effects to the environment for each relevant 'event' identified in Table 5.5.	The Major Events section of the ES and accompanying table, as set out in ES Chapter 4, sets out the approach to the assessment of scoped-in major events and, where relevant, sign-posts to the topic chapter in which that potential effect is assessed.	ES Chapter 4 (document reference 6.1).
3.3.18	Tunnel Closures and Diversionary Routes	The ES should also assess major accidents and disasters including the potential for tunnel closures taking into account the likely frequency of occurrence during operation, and the need to use the identified diversionary routes.	The Major Events section of the ES and accompanying table, as set out in ES Chapter 4, includes a descriptions of vulnerability of the Proposed Development to risks of major accidents and/or disasters, including those which could occur in the tunnel. Use of the diversionary route is discussed in ES Chapter 2. It is considered that the closure of both bores would be an extremely rare event.	ES Chapter 2 and 4 (document reference 6.1).
Wiltshire Council	Major Events	5.7 Major Events, Appendix B and Table 5.5 – The impact of events on the historic environment, including OUV, should be included here	Where the assessment of major events (including both major accidents and disasters) considers that there is potential for the scheme to be more vulnerable to major events than the existing road or that the risk of a major event occurring is higher as a result of the proposed scheme, the implications of the major event on all environmental topics has been considered, as described in ES Chapter 4, Environmental Assessment Methodology. The assessment of major events concluded that the potential for increased vulnerability or risk was not relevant to cultural heritage assets.	ES Chapter 4 (document reference 6.1).
Late Response: PHE	Major Events / EMP	Within the EIA PHE would expect to see information about how the promoter would respond to accidents with potential off-site emissions e.g. flooding or fires, spills, leaks or releases off-site. Assessment of accidents should: identify all potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; and identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.	The Outline Environmental Management Plan (OEMP), ES Appendix 2.2, includes risk reduction measures and contingency action plans for the management of risks associated with accidents and off-site emissions e.g. flooding or fires, spills, leaks or releases off-site.	ES Appendix 2.2(document reference 6.3).
Late Response: PHE	Major Events / EMP	The EIA should include consideration of the COMAH Regulations (Control of Major Accident Hazards) and the Major Accident Off-Site Emergency Plan (Management of Waste from Extractive Industries) (England and Wales) Regulations 2009: both in terms of their applicability to the installation itself, and the installation's potential to impact on, or be impacted by, any nearby installations themselves subject to the these Regulations.	The Major Events section of the ES, as set out in ES Chapter 4, includes consideration of the COMAH Regulations.	ES Chapter 4 (document reference 6.1).

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Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ
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