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Highways England

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RESPONSE OF WINTERBOURNE STOKE PARISH COUNCIL: A303 STONEHENGE SCHEME PUBLIC CONSULTATION

To Whom It May Concern:

Winterbourne Stoke Parish Council are not statutory consultees in the A303 Stonehenge Scheme Public Consultation; a situation that many parishioners, and others living in the vicinity of the scheme, find both surprising and concerning. Indeed, we believe that failure to engage locally sets the tone for much that we have observed and experienced over the last two months. Whilst this may be normal practice for Highways England and its road schemes, we would suggest it falls far short of what might, or perhaps should, be regarded as "best practice".

It was clear to the Parish Council, from the time of our preview of the scheme, including plans for the two bypass options for our village, on Friday 13th January, that whilst a lot of time and effort had gone into identifying and optimising the proposed tunnel through at least part of the Stonehenge World Heritage Site, that significantly less effort appeared to have been given to the western section of the scheme that bypasses our village. Indeed, the initial reaction was that much more effort had been put into solving the needs of the long dead than the living. Cynical? Maybe; but heartfelt.

More importantly, none of the Highways England staff and their contractors were able to answer any questions in any depth. Although the presentation material was superficially slick, there was little of underlying substance to support it.

We were also concerned by the re-appearance of a southern route; an option all had believed was long dead and one that had been rejected as being unsuitable. We were worried that this would prove divisive in the village.

Following feedback to parish councillors after the first public session at the Manor Barn in Winterbourne Stoke on Saturday 14th January, it became clear that from being a village split in half by the current A303, we were fast becoming a village divided by the bypass options. Virtually all those parishioners who spoke to us, including some of those with little option in their choice of route preference because of their financial/occupational interests, were concerned about the lack of detail provided to answer even that most basic of concerns: "How will each of the proposed bypass schemes affect me and my family."

All such questions were met with what can only be described as high level "waffle" regarding "overall corridor impact" and vague assurances to the effect that there was "little to choose" between the two routes. This may well be true at the highest level of aggregation and when trying to influence the Secretary of State, but totally irrelevant to parishioners concerned about the future of their parish, asking parochial questions and demanding parochial answers.

At our Parish Council Meeting on 16th January 2017, already aware of the deep divisions in the community, the lack of answers to these basic questions, and with a growing sense of unease, we felt that it would be inappropriate for the Parish Council to support either of the routes proposed, but we did need to support the community whichever route was ultimately selected. We undertook to do three things on behalf of the whole village: to seek answers to the key questions raised by parishioners; to establish the broad range of opinion across the village without asking individuals their preferences, but noting if they offered them and to hold a meeting to allow villagers to have a voice to air their concerns and to offer ideas for mitigation that might spark further thoughts that could be incorporated into individual responses. The Parish Council conducted a "door stepping" exercise to elicit responses designed to gauge the concerns of the parishioners without specifically asking the divisive question as to route preference.

This revealed that It wasn't just a simple binary question of north or south. As mentioned previously, some villagers must opt for one route or another because of the huge impact on their personal circumstances, others have opted for a route on the basis of their own understanding and local knowledge. Still others have no clear preference, or want to have a preference but can't get answers to their fairly basic questions from Highways England. Some, because they can't get answers, would prefer to stick with the status quo and some think the whole idea of a bypass is an enormous waste of public money and are happy with the A303 as it is. We learned that of the many villagers who want to go ahead with the bypass, a proportion are torn between the two routes, with their head saying one thing and their hearts saying the opposite. We were made aware of differences of opinion within families and even between husbands and wives. This only served to stiffen our resolve to not advocate one route in preference to another.

We sought further information and advice as to how the Parish Council could and might react to the public consultation on the A303 Scheme from the National Association of Local Councils. Much as anticipated, all roads point back to the Good Councillors Guide: <http://www.nalc.gov.uk/library/publications/801-good-councillors-guide/file>

"The job of your council is to represent the interests of the whole community."

...not just a part of it, not our view as a Parish Council, not the interests of the most vocal lobby group, but the interests of the whole community. Highways England will be well aware of the individual views of villagers from their personal responses; and thus the preferences of the village as a whole. As a Parish Council, we support and respect the interests of ALL our parishioners whatever they happen to be.

CONCERNS

Parishioners have a number of concerns that apply, irrespective of their route preferences. The most important of these has been the lack of real answers to their most basic of questions, the constant reference of Highways England staff back to the Technical Appraisal Review, which consistently fails to contain the detail claimed for it.

As of the date of this letter, we have still not been shown any information that could go any way to credibly answering the question of "how will each of the routes offered affect me?" for any properties within the parish. Although you have offered to make such information available to us, and to other individuals from within this and nearby parishes, this has not been done.

Noise - We have been told collectively and individually that certain information relating to noise is not collected at this stage of road development process, that it couldn't be done at this stage as there are two different schemes, etc, etc Even a superficial examination of the Highways England consultation website lends the lie to such a claim. A good example of this related to the Lower Thames Crossing at Dartford where the information being sought for our own scheme was presented in great detail - at the pre-consultation stage. For instance, the background noise levels in and around Dartford were clearly collected even at this early

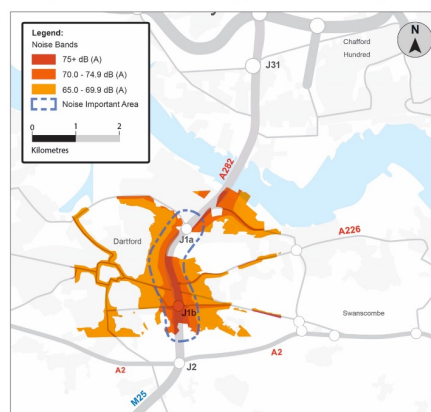


FIGURE 3.3 - EXISTING NOISE LEVELS ALONG THE A282 CORRIDOR AT DARTFORD

stage, despite there being at least 4 alternative road schemes being considered for public consultation. We regard claims that this approach was “anomalous” as somewhat risible in the circumstances. We would suggest this was an example of, if not “best practice”, certainly better practice than the approach taken for the A303 Stonehenge Scheme. We have also been told, repeatedly, that the methodologies employed are following non-statutory guidance. That is certainly true, but we would remind you of the landmark legal case relating to Department for Transport non-statutory guidance, *Ali v Newham LBC* (October 2012), where the High Court held that some non-statutory best practice guidance has a similar legal effect to statutory guidance. This may become an issue should whichever route be chose prove detrimental to the interests of villagers.

We have asked for details of the un-mitigated noise predictions for sensitive receivers within the village, as generated by the CRTN methodology and the mandated DMRB process and Highways England have failed to produce them. You have suggested that these could be re-calculated by us - which they could very easily - had you provided details of the assumptions you had used in your calculations. However, this information - an example of “best practice”, was for you to provide and put in the public domain to illustrate that you had done the job properly. You have not done so and so we can only conclude that Highways England, or those acting on your behalf, have not done the job properly. This view has been reinforced by the level of obfuscation we have met in seeking answers.

Noise is a major concern and **ALL** wanted to be assured that whichever route was eventually chosen, they would be no worse off than they were at present. There was concern that Highways England did not appear to have the slightest idea of current levels of noise within the village, nor the impact that the wind had on this. This was particularly noticeable in the south west of the village where sound levels were (subjectively) similar to those experienced closer to the A303 in Church Street.

Pollution - We asked for information relating to pollution arising from each of the suggested bypass routes. Again, we were told that this information isn’t produced at the level of granularity we were seeking and yet once again, it was just this level of detail that was presented for the Dartford scheme:

TABLE 4.1 - PREDICTED ANNUAL MEAN NO₂ CONCENTRATIONS AT SELECTED RECEPTORS WITHIN 200 METRES OF AFFECTED ROAD NETWORK AT SHORTLIST ROUTES 2 - 4

Property ID	Without Scheme (µg/m ³) [1]	Routes 2, 3 and 4 WSL and ESL (µg/m ³) [1]	Difference between Routes 2, 3 and 4 WSL and ESL and Without Scheme (µg/m ³)	Approximate Number of Potentially Influenced Receptors [2]
R4	43.0	40.4	-2.6	<10
R8	39.0	37.2	-1.8	<50
R9	37.2	35.8 or 35.9	-1.3 or -1.4	<50
R12	43.7	38.1 or 38.2	-5.5 or -5.6	<50

[1] LTT=Long Term Trend. Predicted NO₂ concentrations were adjusted using a gap factor based on the long term adjustment factor calculated by the Highways Agency’s “Interim Highways Agency Alternative Long Term Gap Analysis Calculator v1.1”. All values reflect predicted concentrations for the future year 2025.

[2] Value reflects an approximated number of receptors which occur in the vicinity (and thereby may experience a similar effect of the scheme) as the modelled receptor.

There was unanimous concern that too little information had been provided to show the benefits (or decrements) in air quality that each scheme offered Winterbourne Stoke. A passive nitrous oxide sampling tube had been observed in south Church Street in summer 2016. The results of the sampling exercise had been promised to us in the autumn of 2016, by Highways England staff, but despite being promised, nothing has yet materialised.

We’ve Been Here Before - A real fear for many villagers is that once again, the whole bypass idea would cause a lot of acrimony, then fail as it so often had in the past. Many parishioners are desperate for a bypass and want it to happen, but not at any cost. Furthermore, a significant number of villagers had

expressed the view that they would prefer to maintain the status quo because they felt they had not been given sufficient information on which to base a rational choice, they didn't trust Highways England and it was a case of "better the devil you know".

Funding - There is continuing concern that regardless of the fine words of politicians, the money is not guaranteed beyond March 2020.

Models - Most villagers feel that there was a lack of detailed visual impressions of either bypass route (3D models, routes from multiple directions and ground level fly-thrus) to allow them to visualise how the road might appear. The video images provided were inconsistent with the stills images and some felt that the latter were particularly partisan in their outlook.

Flood - there was general disquiet that the bridging of the River Till, particularly in the case of the northern route, might exacerbate surface water flooding. It was noted that although borehole monitoring for the project had started in the vicinity of Cleeve View, it should be remembered that winter water levels at Tilshead were at a 4-year low and this needed to be brought to the attention of Highways England.

Impact on Footpaths and Byways - there was general concern that both schemes would lessen the amenity value of the footpaths and byways that led out from the village, but particular mention was made of those that led to the south, used by dog-walkers, runners and families from both Winterbourne Stoke and Berwick St James. Several walkers from the village expressed concern that Highways England had not considered footpath usage in the winter in assessing environmental impacts. Villagers had pointed out that some footpaths were more heavily used in winter than summer, because in summer, grazing cattle tended to deter their use.

How Was The Route Preference Being handled by HE? - was this going to be based on the quality of argument, or simply by the numbers of people voting for each route. Were the views of locals (ie Winterbourne Stoke) going to be given more weight than those from further afield. Would the archeological concerns over-ride those of the living? We had the opportunity to ask about this in detail with Highways England staff at a subsequent roadshow. Although we were encouraged to hear that an assessment would be made taking into consideration the origin of the comments and the strength of the argument, we were very concerned that Highways England appeared to have no methodology in place to do this.

Archeology - we were advised, on several occasions, that there was new archeology that would impact on the final siting of the new junction between the A303 bypass route and the A360. Despite asking for specific details of these finds we have received no further information. We discovered from the World Heritage Site Committee briefing that archaeological reports had indeed been prepared and peer reviewed but were being "sat on" by Arup Atkins. We find the idea that a contractor could be withholding any information that might influence the debate to be wholly unacceptable.

Why are the projected road levels so high? - There was considerable concern regarding the road heights of both schemes and these seemed to be largely driven by the need to get rid of spoil from the proposed tunnel. We have asked numerous Highways England staff how much spoil would be generated and received multiple answers that vary considerably. We appreciate that a drilled tunnel might generate a different amount of spoil to a face-cut tunnel, but it would be useful to know how much spoil would be generated by the tunnel, and if one of the schemes would 'lose' more of it than would the other. Highways England had advised some that the high embankments were needed to ensure the gradient of the road did not exceed 2% for the benefit of HGV's. Several villagers believed this argument was specious as the A303 has many steeper sections to the east and west, used by these same HGVs on long distance runs. In the light of both these points, some parishioners wonder if the reason the presentation material showed the road raised on embankments, whereas previous bypass schemes have sought to sink the A303 into green cuttings, was simply a cynical exercise on the part of Highways England. By first showing the road on high embankments, then at a later stage showing the use of the embankment soil to provide the obvious bunded mitigation would give the appearance of design "concession" to local concerns, but have been intended from the outset. We have seen nothing that would demur from such a view.

Why the difference in viaduct heights between the two schemes? - the viaduct in the northern scheme seems unrealistically high, certainly compared to earlier bypass proposals. As with the general road levels, this seems to be related to the need to get rid of tunnel spoil or, as some villagers have been told by Highways England staff, that this is because the Till valley is part of an SSI and the height was needed to ensure that the area under the viaduct experienced daylight. We consider the only factors that should govern the height of either viaduct should be the need to provide adequate space to accommodate the "once in 200 year" flood situation and the need to allow access by farm vehicles and machinery underneath it. For the reasons outlined above, we do not consider the need to maintain gradients at 2% to be sufficient reason to raise the height of a viaduct. Similarly, the loss of light to a very small section of the the Avon SSSI (there is no specific River Till SSI) would have a minimal ecological impact on the Till itself or the river system as a whole when compared to other activities such as water abstraction from the local aquifer.

Phosphatic Chalk - we are aware of the presence of a band of phosphatic chalk in the vicinity of Stonehenge and are concerned that spoil containing this material might be dumped within the run off margins of the River Till system. This applies regardless of the route finally selected. We are not aware that the ecological damage that this material could wreak within the River Till, then the Wylye and Avon downstream to Christchurch has been fully evaluated. We also note that the phosphatic chalk in question is, according to its finder, a source of radon gas - implying that the chalk itself contains not insignificant levels of uranium, thorium and radium. Whilst few houses in the area have cellars, so the direct problems associated with radon leaching experienced in Cornwall are unlikely, a bigger concern here is exposed phosphatic chalk producing radon and, more particularly, radon progeny that would bind to respirable dusts (such as the PM10 particles emitted by motor vehicles) and prove to be an enhanced health hazard by virtue of the radon progeny being alpha radiation emitters. We have yet to see any quantification of what the health impacts of this material might be, or any assurance that all such material would be safely removed from site.

Disruption during Construction - as a small village, there was considerable concern that we would be swamped by a major construction village on our doorsteps for several years. We wish to see what measures would be put in place for each of the two schemes.

A360 Access - there was general concern that this route must be maintained throughout the construction period, as it is the main access to and from Salisbury. We have not seen evidence of how this could be achieved for either scheme

Access to Winterbourne Stoke - there was general concern about the access to and from Winterbourne Stoke throughout the construction period. We would have expected to see, even at this stage, how this would be maintained throughout the construction period as each route would likely have different impacts on the village.

Time Frames - there was near unanimity that the time frame of the consultation was too short, particularly as so little detailed information had been provided.

MITIGATION MEASURES

We believe that there are many mitigation measures that could be brought to bear on both of the proposed route options. Most of them are already commonly applied to road building schemes in the UK and we find it quite bizarre that Highways England have failed to show these being employed and predicting their likely value in the documentation provided to the public as part of the consultation process. This would have greatly assisted the public in deciding on a route preference.

The most appropriate route - Villagers are concerned that the route decision is not only going to affect their lives, but also lives of villagers for generations to come. The best form of mitigation is to ensure the least detrimental route of the two on offer is the one adopted. However, the level of granularity in the appraisals and assessments presented to the public is such, that even a significant difference of the human impacts of the Winterbourne Stoke bypass options would get lost in the much bigger signal caused by the eastern half of the scheme. Consequently, many villagers have little confidence that Highways England understand the lack of sensitivity of their own methods.

Spoil - a considerable part of the discussion within the village has centred around a collective fear that the village and its environs are simply considered a dumping ground for the spoil from the Stonehenge tunnel. As mentioned previously, creative use of the spoil could maximise sound-proofing and eliminate a lot of the visual impact of both route proposals. The best way of achieving this would be to dig the routes into cuttings and use the spoil generated and the spoil from the tunnel to create large earth banks on either side of the carriageway; very similar to the way the A36 is separated from the village of Steeple Langford; a few miles to the south-west of Winterbourne Stoke. In the case of the northern scheme, earth banks, creatively employed, could be used to screen more of the proposed viaduct from the sightline of the northern edge of the village.

Acoustic measures - villagers are very aware that acoustic measures such as use of special road surfacing materials and acoustic barriers in addition to bunds are available and have been used in road schemes in the past. They are equally aware that such measures have been delayed on some road schemes and have failed to deliver the level of sound attenuation predicted for them on other schemes. They want assurances that, irrespective of the route selected, these measures would be put in place from the outset and assessed over the first year of operation and further mitigation measures put in place should the initial ones be found wanting. They would want a firm guarantee from government that mitigation measures required for a

Winterbourne Stoke bypass could not and would not be sacrificed to off-set cost over-runs on the eastern part of the scene

Visual Screening - villagers wanted similar levels of assurance that planting of hedgerows and other visual screening measures to hide the bypass from the village would be part of the scheme from the outset. It was also suggested that the planting of more mature specimens would aid either route to blend into its surroundings more readily.

Traffic Calming Measures - there was general concern that the design of both proposed junction options for the A303/A360, but particularly the one suggested for the northern route might, perversely, encourage rat-running along the High Street by north and southbound traffic transiting Shrewton and keen to avoid the Airman's Cross section of the A360. We have seen no proposals from Highways England regarding the sort of traffic calming measures that could be applied to the legacy section of the A303 that could be applied between the village and eastwards towards Longbarrow roundabout. However, we would suggest a narrowing of the entire route with build-outs and the creation of a protected footpath/bridleway/cyclepath, separated from the carriageway on the northern side of the current A303, together with a bridge over the northbound A360 at Longbarrow, to allow this non-vehicular traffic a safe entry point into the World Heritage Site.

Local Business Support & Sign-Posting - Whichever route is ultimately adopted, some local businesses will lose out. The village is keen to ensure that as much as possible is done to minimise the impact of the bypass to the village economy and to encourage forms of diversification that will benefit the local community and the World Heritage Site - hence the need for easy, safe and direct non-vehicular access to the WHS. The two businesses most likely to suffer as a result of the bypass are Stonehenge Filling Station and the Solstice Rest pub (formerly the Bell Inn). We would suggest that an obvious place to site a replacement filling station would be in the vicinity of the A303/A360 interchange. That would free up the service station site within the village for housing or some other purpose. It was felt critical that remaining local services and businesses, when disconnected from direct access to the A303, should, as a matter of course, be advertised by brown signage off the bypass. One "off the wall" suggestion was that HE should purchase the pub and give it to the village as a community asset.

Local Facilities - the removal from use of the A303 at the western edge of the village at, and to the west of, the entrance to Scotland Lodge Farm raises the possibility that some of this flat land could be re-used for the benefit of the local community. We currently have no facilities for children over 12 years of age and teenagers and the land here might be ideal for the creation of a football pitch, etc.

CONCLUSION AND RECOMMENDATIONS

From the foregoing, the Parish Council are drawn to the inescapable conclusion that Highways England have failed, quite abjectly, to provide sufficient information, at an appropriate level of granularity, to allow any of our parishioners (save those who have a personal imperative) to come to an informed understanding as to the likely impacts of each of the route proposals on their lives. Consequently, it is completely unreasonable to expect anyone whose lives will be so directly affected to express an informed preference for either route.

We believe, from responses teased out of Highways England by ourselves, our MP Mr John Glen, and others, that much of the information, appraisal, assessment and prediction needed to answer these fundamental questions already exists and that essential baseline data could be gathered fairly swiftly if the instruction was given to do so. We are frankly appalled by the way we and our parishioners have and continue to be treated in this matter and wish that Highways England had put as much effort into presenting and answering these questions as they seem to be doing in withholding information.

In light of the above, we believe no rational decision can or should be taken on route selection until **ALL** the key concerns of our parishioners have been addressed, at a level of granularity that can illustrate the differences between, and impacts of, each route option.

Whilst we have no wish to stall the delivery of a much needed bypass for our village, something many of us have fought long and hard for over several decades, it is sometimes necessary to not simply "go along with the crowd". It is not, and must not be allowed to become a case of "a bypass at any cost".

Sometimes there is a need to draw a line in the sand and we think this is one such occasion. We call upon the Secretary of State for Transport to extend the consultation period until such time as Highways England have suitably addressed these fundamental questions and to defer route selection until one month after this has been done. This should not delay the overall scheme

unduly and might serve to prevent a disastrous mistake being made to the eternal detriment of Winterbourne Stoke and the Till Valley.