

Response from CPRE SW to Examining Authority's Written Question SE.1.12

These comments should be read in conjunction with the Written Representations submitted by the Stonehenge Alliance of which CPRE is a partner organisation.

We will be working with them as this inquiry progresses.

Evidence requested to support CPRE SW comments:

1. Why we consider the scheme to be contrary to national and international legislation and conventions.

For some years now there has been growing awareness of the need for reduction in CO2 emissions to reduce climate change. This government is now signed up to the Paris Agreement on Climate change that requires a clear programme of reduction. In the UK, transport accounts for some 30% of CO2 emissions. We consider that this development will put us in contravention of our commitments through the agreement on CO2 emissions.

1 - cont. Why we consider the scheme to be contrary to relevant national planning policy and local plan policy.

The Road Traffic Reduction Act still applies, and local plans are required to contribute to its delivery

1 - cont. Why we consider the scheme to be contrary to the WHS management plan.

The Management Plan states: "Stonehenge, Avebury and Associated Sites was inscribed on the World Heritage Site List in 1986. It was one of the first seven sites to be nominated by the UK and containing over 700 other monuments spanning around 2,000 years of history."

For CPRE the 2015 Management Plan sets out the clearest of criteria as follows:

"The purpose of a management system is to ensure the effective protection of the nominated property for present and future generations"

The priorities of the 2015-2021 Management Plan are to:

1. Protect buried archaeology from ploughing and enhance the setting of sites and monuments by maintaining and extending permanent wildlife-rich grassland and managing woodland and scrub
2. Protect monuments from damage by burrowing animals
3. Reduce the dominance and negative impact of roads and traffic and ensure any improvements to the A303 support this
4. Improve the interpretation and enhance the visitor experience of the wider landscape
5. Ensure any development is consistent with the protection and, where appropriate, enhancement of the monuments and their settings and the wider WHS landscape and its setting (NB, not just the Stones)
6. Spread the economic benefits related to the WHS to the community and wider county
7. Encourage local community engagement with the WHS

8. Encourage sustainable archaeological research and education to improve and communicate the understanding of the WHS.”

Management Plan Priorities for 2015-2021:

“The primary purpose of this Management Plan is to guide all interested parties on the care and management of the World Heritage Site to sustain its Outstanding Universal Value . . .

. . . The ongoing and overarching priority of the Management Plan is to encourage the sustainable management of the WHS, balancing its needs with those of the farming community, nature conservation, access, landowners and the local community.”

We do not believe that handing over a major section of the WHS to Highways England for “burrowing” well beyond the levels of damage caused by “burrowing animals”(see 2 above) is in line with this management plan.

Continuing archaeological investigation on the full site is revealing how important the Setting is, in its links to the wider world over millennia and in the wealth of hidden remains.

2. Why we consider there is a paucity of evidence and analysis to provide for informed responses, and to justify the suggested ‘benefits’, including benefit or disbenefit to local communities.

We do not contest the desires of the people of Winterborne Stoke to be freed of traffic through the centre of their community, nor for the local people to be freed of rat-running at times of congestion. Our concerns come from the stated aims

- to “upgrade” the route to take 20% to 40% more traffic
- to provide a “relief” route from the SW to London when the M5/M4 route is blocked or over congested and (see Devon and Cornwall’s support statements)
- to reduce overall journey times (and by inference, increase speeds).

Today the setting of Stonehenge WHS is rural, standing above much of the surrounding landscape, and largely quiet for much of the night and even of the day. The design of the proposed new junctions and the anticipated importance of the route as a SW - SE link is such that there will be noise emissions through day and night from the raised intersections, including that adjacent to Winterborne Stoke. This is not the case at present.

Highways England has suggested at the local consultation sessions that the newly dualled road will “reduce rat-running”. However it is clear that in the event of an accident on a carriageway there will be nowhere else for the displaced traffic to go other than through existing local roads. HE has not consulted on how this should be managed and dealt with to spare the local communities.

The noise impact on wider area of the WHS appears to have been neglected, And, when questioned at the consultations, there were no figures available for the impact of the increase in speeds to 70mph.

We are further concerned at the lack of consideration of the management of both speeds and accidents in this increased traffic scenario. We are already aware of the increased speeds and lack of enforcement of limits on the existing dual carriageway sections of the A303, and have heard no proposals for either monitoring or enforcement.

3. Why we consider the scheme would be damaging to local tourism businesses and the local economy.

A. The economic surveys conducted included remarkably few of the local rural businesses around the WHS. They included very few accommodation providers for people who visit the area for walking, cycling, riding and visiting Avebury and Stonehenge, along with the wealth of attractive rural settlements. Other local businesses are largely primary agriculture related, and again received little attention.

The issue of Severance caused by dualling of roads, and in particular those on raised routes, or in cuttings, has not been addressed with the local people. It is informative to compare the paucity of this Highways England Study with that carried out by Halcrow for the RDA in 2006, which concluded that there was a very poor economic benefit available to the area as a result of the road scheme.

4. Why we consider the predicted increase in traffic on the route ranges from 20% to 40% or more and what you consider the implications are of this.

We don't just consider this - we were presented with clear slides by Highways England at the final Taunton consultation in 2017 showing the possible scenarios and that these are the anticipated increases in road traffic. These figures are included in the Stonehenge Alliance response to your consultation.

Our hope and expectation is that these issues will be investigated thoroughly by the Planning Inspectorate.