

(Examining Authority Written Question Reference)

- 1 The Peak District Green Lanes Alliance is a co-ordinating body for groups and individuals concerned about the problems caused by off-road vehicles on unsealed and unsurfaced tracks in the countryside. Our main focus is the Peak District but our interests extend to major landscape features throughout the country, such as National Parks, Areas of Outstanding Natural Beauty and National Trails. We regard the Stonehenge World Heritage Site (WHS) as a similar feature requiring protection from recreational off-road vehicles.
- 2 We feel Highways England (HE) has put insufficient emphasis on the views of ICOMOS, the Stonehenge & Avebury WHS Co-ordination Unit and the archaeological community. Also detailed heritage and cultural impacts have only been available after the main public consultations and are still incomplete. Agreement to the scheme and its effects on archaeology should also be sought **independently** from HMAG's Scientific Committee.  
(CH.1.1/14/30/36/49/51)

**Route and Nature of the A303 Upgrade around Stonehenge**

- 3 Supporters of the project (RR0105, RR1626, RR1745, RR2275) claim benefits of £40bn Gross Value Added (GVA) for the whole of the south-west from the complete upgrade of the south-east and south-west link.
- 4 These organisations acknowledge there is already a major link between the two areas through the M4/M5. The overall scheme is therefore providing a **second** major link not satisfying an unfulfilled need. Economic benefits need considering in this context. (SE.1.29) (Tr.1.11)
- 5 Supporters assert the Amesbury/Berwick Down section of the link is that posing most problems in delay and unreliability.
- 6 However, they quote the Road Improvement Strategy of 2019/20 as having a budget of only £2bn for three projects of which this is just one.
- 7 This impression of working to a fixed budget is reinforced in section 6.2.5 of the 2<sup>nd</sup> ICOMOS report which shows HE fixated on a tunnel length of 2.9km. (AL.1.6/29/30)
- 8 Our understanding is that this budget constraint results from the need, under Treasury Green Book guidance, to show a benefit for this specific project and not just for the overall scheme. This seems to us to be perverse and means that any difficult project within a scheme is almost guaranteed an unsatisfactory outcome. It seems particularly perverse if this project is the one giving most benefit to the overall scheme.
- 9 If the quoted GVA for the overall link is realistic, an additional £0.6bn to provide a tunnel of 4.5km under the whole of the WHS compared to the proposed 2.9km one (resulting in the widely criticised east and west portal locations) would seem reasonable. (AL.1.31)
- 10 However we suspect HE's failure to carry forward the F010 surface route as an alternative to a tunnel results from time rather than cost constraints, since it would have taken an extra year.

- 11 We feel the uniqueness of the WHS and the UK's obligations under the World Heritage Convention make arbitrary cost and time constraints inappropriate and believe HE should report to the Secretary of State that they cannot deliver a solution acceptable to ICOMOS and the archaeological community unless they are relaxed. We feel you should **flag** this in your report although we are not asking you to **judge** Government policy.
- 12 We would like to see a comparison of an extended tunnel and surface routes in the Stonehenge/Salisbury corridor, both wholly outside the WHS. (AL.1.10/11/12/13) Besides F010 these should include simply upgrading the A338 or A345, Salisbury ringroad and A36. (New) (Tr.1.17)

### **Proposals for the Future Rights of Way Network**

- 13 Since these proposals can support the project's aim "To conserve and enhance the World Heritage Site to make it easier to reach and explore" and address its impact, we feel principle 2 makes them an "associated development". (DCO1.4/7)
- 14 The WHS Management Plan emphasises the detrimental impact of motor vehicles and the desirability of getting visitors away from the major monuments and exploring the wider setting by **foot**. Therefore we believe no new Byways Open to All Traffic (BOATs) should be created. In particular we see no justification for upgrading bridleway BSJA3 to Byway Open to All Traffic (BOAT) and continuing it eastwards along the existing A303. (Tr.1.24)
- 15 There appears to have been no assessment of the health benefits to both residents and visitors of making the WHS effectively a traffic free zone where recreation and exercise can be enjoyed in tranquillity. (New Issue)
- 16 We approve the downgrading of the existing A303 route to Restricted Byway since this would facilitate north and south circuits of the central part of the WHS and give access to the Winterbourne Stoke group of tumuli. Retaining it as a BOAT would run counter to the Management Plan and if it had a grass surface (in keeping with Management Plan Policy 3g "Maintain, enhance and extend existing areas of permanent grassland where appropriate") it would not sustain vehicle use. (CH.1.13) (Tr.1.28)
- 17 We do not regard the preservation of the current glimpse of Stonehenge from the road as desirable. As a general principle we feel such glimpses merely distract drivers. (Tr.1.10) Moreover free access to Stonehenge itself is available on foot from the visitor centre, where parking is not charged for. (HW.1.14) (SE.1.16)
- 18 We are very concerned about the future use of what have become known as Byways 11 and 12. Their existence prevents the removal of the incongruous presence of motor vehicles from the central part of the WHS, which would be a major boost for the Management Plan. We definitely do not want to re-instate a link between them and risk possible damage to as yet undetected archaeological remains. (AL.1.20) (Tr.1.28)
- 19 Byway 11 cuts through the Normanton Down barrows and would become a dead-end at the line of the old A303. We feel this would result in two way traffic for sightseeing.
- 20 Byway 12 is exceptionally objectionable in that it crosses the major earthwork of the Cursus; passes close to the Stonehenge circle itself; cuts through the Normanton Downs barrow complex and RSPB reserve; and passes a number of other earthworks/barrows before disgoring on the A360. All these remains are at risk from recreational off-road

vehicles. Our experience of Putwell Hill and Pindale in the Peak District is that the humps and hollows resulting from buried ancient monuments are an irresistible attraction to many off-roaders.

- 21 If left unaltered, both these Byways will encourage vehicular approach to Stonehenge itself and the concomitant parking and unofficial camping. We believe the right to use mechanically propelled vehicles on them should be removed.
- 22 We feel this would be justified under the following grounds for Traffic Regulation Orders (TROs):- Facilitating the passage of other users; preventing use unsuited to existing character of route; preserving that character; preserving/improving amenities of area. Plus, on National Trust land, for conserving natural beauty.
- 23 We appreciate that under s136 of the Planning Act 2008, a right of way cannot be extinguished by the project unless there is an alternative; or one will be provided; or there is no need for an alternative. However s136 does not say that the alternative has to be a right of way with an identical status to one extinguished. Alternatives to Byways 11 and 12 exist through the normal tarmac road network – Byway 11 via the minor C42 road running alongside the river Avon, either north east to the Countess roundabout or south west to the A360 via Middle Woodford; Byway 12 via the diversionary routes already defined for traffic barred from using the tunnel. [\(AL.1.20\)](#) [\(Tr.1.28\)](#)
- 24 Recreational motor vehicle users claim forcing them on to the tarmac road network decreases their safety. Nevertheless they use this network extensively to link BOATs.
- 25 In 2010 Wiltshire County Council (WCC) intended to ban motor vehicle use on Byways 11 and 12. The council employed the Planning Inspectorate to conduct a non statutory public inquiry to report on “whether the statutory grounds for implementing the proposed TRO ... have been met.” As a result of the inspector’s report, WCC did not proceed. One of the inspector’s reservations was whether the amenity for visitors to Stonehenge would be improved by the ban since any noise and visual intrusion from vehicles on the BOATs was dwarfed by that emanating from the current A303. Now that the latter is to be downgraded to restricted byway, the situation is entirely different and the amenity to non-vehicle visitors would be significantly increased. [\(Tr.1.29\)](#)
- 26 Paradoxically the Inspector accepted that parking and camping on the BOATs **was** a significant detractor of visitor amenity and would be difficult to control through means other than banning vehicles. This remains true.
- 27 Wiltshire has 819 km of BOATs and another 43 km of Unsealed Unclassified County Roads (UUCRs) which are used by recreational vehicle users unless/until their right of way status is properly determined to be otherwise. This is more than any other county. Therefore removal of the 7km of Byways 11 and 12, would not be a significant loss.