

**TR010025**

**APPLICATION BY HIGHWAYS ENGLAND  
FOR  
AN ORDER GRANTING DEVELOPMENT CONSENT FOR  
THE A303 AMESBURY TO BERWICK DOWN  
SCHEME**

**Written Representations made on behalf of  
THE STONEHENGE ALLIANCE**

**Ref. No. 2001870**

**WRITTEN REPRESENTATIONS SUBMITTED TO THE EXAMINATION**

**Principal Issue (P.I.)**

**Authors**

**P.I. 3. Alternatives**

Dr. Kate Fielden, BA, D.Phil. *and*  
George McDonic, MBE, BL, DIPLTP,  
DPA, FFB

**P.I. 4. Biodiversity, biological environment and ecology**

Dr. Kate Fielden, BA, D.Phil., *with*  
*advice of* Tracé Williams, MSc., BSc.

**P.I. 7. Observations on geological, geotechnical and hydrogeological information**

Dr George Reeves, CGeol, CEnv,  
PhD, MSc, BSc (Hons), FGS, FIMMM

**P.I. 9. Heritage and historic environment**

Dr Kate Fielden, BA., D.Phil.

**P.I. 10. Landscape and Visual Aspects of the LVIA**

Andy Norfolk, MSc, Dip.L.A.

**P.I. 11. Tranquillity**

Clive Bentley, BSc (Hons), CEnv,  
CSci., MCIEH, MIEEnvSc. MIOA

**P.I.11. Vibration from Tunnel Boring**

Rupert Thornely-Taylor, FIOA

**P.I. 13. Transport Planning and Economics**

Dr Simon Temple, BSc, MSc, D.Phil.

**Additional Issues:**

**Cultural Heritage Value: Valuing Heritage Impacts: Appraisal of Arup/ Atkins/ Simetrica  
Report to Highways England**

Alan James, MA, BSc.

**Consultation on the Scheme**

Dr Kate Fielden, BA, D.Phil.

## **THE STONEHENGE ALLIANCE**

The Stonehenge Alliance is supported by many individuals around the world, in addition to a group of the following five national NGOs.

**Ancient Sacred Landscape Network:** an informal network with around 2,200 Facebook followers, set up in 1997 as a focus for the exchange of information about ancient sacred sites and their care. <https://www.facebook.com/AncientSacredLandscapeNetwork/>

**Campaign for Better Transport:** a leading charity and environmental campaign group that promotes sustainable transport policies. Its vision is a country where communities have affordable transport that improves quality of life and protects the environment. <https://bettertransport.org.uk/>

**Campaign to Protect Rural England** (<https://www.cpre.org.uk/what-we-do>). An environmental charity with around 60,000 supporters (c.35,500 members). Working locally on planning issues and nationally on influencing policy, CPRE campaigns for a beautiful and living countryside, promoting sustainable land use, to protect and enhance our towns and countryside to make them better places to live, work and enjoy into the future. CPRE also conducts research, e.g., on tranquillity, light pollution and the impact of more roads. CPRE Wiltshire Branch has over 800 members; supported by CPRE nationally, it has taken the lead for CPRE on the A303 Stonehenge scheme. <http://www.cprewiltshire.org.uk/>

**Friends of the Earth Limited** is a not-for-profit limited company limited by guarantee and part of an international community dedicated to the protection of the natural world and the wellbeing of everyone in it. We lead campaigns, provide resources and information, and promote alternative solutions to create a cleaner, healthier, fairer world for everyone, for today and generations to come. Friends of the Earth is a founder-member of the Stonehenge Alliance, campaigning to protect the WHS and its natural environment and to limit new road building to help reduce carbon emissions. <https://friendsoftheearth.uk/who-we-are>

**Rescue, The British Archaeological Trust:** an independent charitable trust dedicated to promoting and supporting archaeology and the historic environment in Britain and abroad. Rescue plays an active role in these fields by holding conferences and talks, participating in heritage fora, publishing, responding to relevant consultations and issuing newsletters for members on pressing issues. <http://rescue-archaeology.org.uk/>

## **OUR POSITION**

The Stonehenge Alliance was formally constituted in 2001 to oppose an earlier A303 improvement scheme considered at a Public Inquiry in 2004. That scheme was abandoned in 2007 owing to unforeseen costs arising from problems with soft phosphatic chalk and a high

water table: issues which remain critical today. Since then, our efforts have been concentrated on helping to achieve closure of the A344/A303 road junction (undertaken 2013) and pressing for small-scale improvements to safety and traffic flow on the A303 not yet fully implemented. We argued unsuccessfully for a sustainable new visitor centre outside the WHS so that a large tract of open countryside in the WHS would not be blighted by vehicle parks and development. We have been campaigning against the current A303 Stonehenge Expressway scheme since it was revived in 2013/4, saying that if a tunnel were to be considered, it should be long enough to protect the whole WHS.

**We therefore object outright to the proposals insofar as they affect the WHS and its setting and do not agree with any part of them. Our specific objections are identified within our Written Representations.**

We have, for practical reasons, mainly restricted our concerns to the impacts of the Scheme on the WHS and its setting but we object to its implications for transport and traffic in the long term and over a wider area.

We do not object to a bypass for Winterbourne Stoke but consider it should be single carriageway in order to reduce the unacceptable impact of the Scheme proposals on the sensitive natural and historic environments, including archaeology and designated sites.

We have raised our concerns about the Scheme with two joint UNESCO WH Centre/ICOMOS Advisory Missions (2015 and 2018) and gave presentations to World Heritage Watch meetings in Krakow (2017) and Paris (2019).

Almost 45,000 people from over 100 countries around the world have signed our petition to the UK Government to reconsider the Scheme. Our website is at <http://stonehengealliance.org.uk/>.

### **STATEMENT OF COMMON GROUND**

The Alliance has given thought to the opportunity offered to undertake a Statement of Common Ground with Highways England. After careful discussion, we have decided against taking up this offer, in part owing to lack of time in which to prepare a SoCG by set timescales and in part because we hope that our representations will explain our concerns in opposition to the Scheme.

### **ANSWERS TO THE EXAMINING AUTHORITY'S WRITTEN QUESTIONS**

We have provided answers to the Examining Authority's questions within our Written Representations as follows:

**AL.1.33. Alternatives, including reference to the NPSNN, paragraphs 4.26 to 4.27,** identifying any legal requirements and policy requirements set out in the NPSNN relating to the assessment of alternatives with which it is considered that the Applicant has failed to comply.  
*Please see our Written Representation on Alternatives.*

**LV.1.17.** More detail requested to support our view that the scheme would be contrary to the aims of the **European Landscape Convention**.  
*Please see our Written Representations on Alternatives and on the Historic Environment.*

**LV.1.18.** Further detail of the **LVIA concerns** outlined in the RRs.  
*Please see our Written Representation on Landscape and visual aspects of the LVIA.*