

From: [REDACTED]
To: [A303 Stonehenge](#)
Subject: Deadline 4 Submission
Date: 21 June 2019 15:48:42
Attachments: [Issue Specific Hearings Summary.doc](#)

Dear Richard Price

Case Officer

A303 Stonehenge Examination TR010025

I enclose my Issue Specific Hearings Summary ahead of Deadline 4.

Regards,

Barry Garwood

Issue Specific Hearings Summary

A303 Stonehenge Examination TR010025

Barry Garwood

ISH2 Cultural Heritage

5 June 2019

Section 4. Stonehenge and Avebury WHS in context

Section 4.ii

The Statement of Outstanding Universal Value (SOUV) for Stonehenge and Avebury WHS was adopted in Phnom Penh, Cambodia in June 2013, before the Mesolithic discoveries at Blick Mead were widely known.

During the construction of the car park for the former visitor centre, adjacent to Stonehenge, an arc of Mesolithic post holes was discovered that date back close to 10,000 years, indicating that some kind of structure stood at the site long before the construction of the stone circle.

Blick Mead has produced evidence of continuous habitation prior to the construction of Stonehenge, going back almost to the end of the Ice Age.

Given this and other Mesolithic finds within the WHS, I submit that, for the purpose of this Examination, the Mesolithic should be considered equivalent in value to the OUV accorded to the Neolithic and Bronze Age by the SOUV.

It should qualify under at least Criteria iii for the assessment of OUV, *a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared*, as set out in the Operational Guidelines for the Implementation of the World Heritage Convention.

If so adopted this would treble the recognised period of interest from around 2000 years to about 6000 years and illustrate the true value of a landscape that shows signs of continuous habitation to this day and for longer than any other site known in Europe. No objections were raised.

I acknowledge that formal adoption of an amended SOUV by UNESCO would require a new inscription by the World Heritage Committee. Any such amendment would need to be proposed by the relevant state party, here Historic England and that this would not be possible within the timescale of the Examination.

Section 4.iii

I question whether the extent of Mesolithic deposits at Blick Mead runs under the embankment of the current A303, as constructed in the 1960s. Certainly the ground seems saturated close to the surface on both sides of this road, as evidenced by the open pit at Blick Mead and the drain at Countess Farm, as seen during the Accompanied Site Inspection of 21 May 2019.

It is understood that no Mesolithic evidence was found during pre-construction investigation in 1965, but as no Mesolithic discoveries had been found around the Stonehenge landscape at the time, it is likely that there was no real effort to look for them.

Modern techniques are considerably more sophisticated and would be very likely to produce more finds. Although the Applicants are happy to assert that 'Mesolithic deposits were probably removed before embankment construction', the fact is that the embankment is built up on the site and Mesolithic archaeology is likely to exist under the modern A303.

Section 5. Heritage Impact Assessment (HIA)

Assessments of impacts and subsequent associated risks have all been carried out by Highways England without scrutiny. The invariable conclusion is that no significant adverse impacts were identified.

Section 6. Effects on Cultural Heritage Assets

There will be large embankments creating visual intrusion around Winterbourne Stoke, as well as material taken from the tunnels being deposited adjacent to Parsonage Down.

This appears to be necessary as a way of disposing of excavated material and a longer tunnel would create even more material to be disposed of.

The Works Compound and adjacent Slurry Treatment Site leave open the question: What will be left after they have gone?

The area to the west of Longbarrow Cross Roads is archaeology rich. It is likely that any archaeology in these locations will be lost or degraded. In particular it is known that Stonehenge Chalk includes unique Phosphatic Chalk that includes natural radioactive elements. No detail has been given on how this will be dealt with, or whether any radioactive material will be used for landscaping.

We would do better to build a Winterbourne Stoke bypass, without need for large embankments, bridges, cuttings and tunnels, by closely following the landform and simply accept slight delays as we enjoy the views of the Stonehenge landscape.

The Eastern Portal will severely impact on the best preserved and highest part of Vespasian's Camp, an Iron Age Hillfort in the grounds of Amesbury Abbey. Headlight of vehicles exiting the tunnel will shine directly towards this point, which will have an especially high impact in winter, when there is little leaf cover on the trees.

The Countess Flyover will impact on the setting of Countess Farm barns which are listed and amongst the best barns to be seen anywhere. The Flyover will also overlook the adjacent house known as Bowles Hatches to the point that vehicles will have a view directly into the bedroom windows. Although modern, it is a significant building built using traditional techniques and the owner is unable to sell with the current uncertainty. Highways do not want to compulsorily purchase it, merely to build a road that overlooks it.

6 June 2019

Section 8 Blick Mead

A call was made for the monument known as Blick Mead to be considered as equivalent to a Scheduled Ancient Monument for the purpose of the examination, with no objections raised in response.

The method of assessment leading to no significant effects being identified for the hydrology of Blick Mead is not open to scientific scrutiny. Views were expressed that a Tier 2 assessment is inadequate for such a sensitive site and that a Tier 4 assessment should take place. The advice of scientists appears to have been ignored.

The proposed location of the Eastern Portal is a dry valley to the west of Blick Mead and dry valleys in the area are known to have high flow rates. Construction here could have a major impact on the hydrology.

It was suggested by Highways England the previous day that the portal could be moved to lessen the impact on Vespasian's Camp.

This would reduce the height to below the water table level at Blick Mead, given that the retaining walls are stated as being constructed down to 64.3m above AOD in the Environmental Statement (ES Appendix 11.4, Table 6.1).

Groundwater levels are generally over 68m AOD at Blick Mead but can fall below the upper level of Mesolithic deposits during a natural drought (ES Appendix 11.4, 4.1.3).

Just to clarify the position of Highways England, I am aware that this is the baseline condition. My concern is that even slight changes to the hydrology could affect this unique and sensitive site.

The schematic views of tunnel sections and foundations for Countess Flyover show both are below the groundwater level of Blick Mead (ES Appendix 11.4, figs. 5.3 and 5.4).

The clearest hydrology modelling produced by Highways England so far can be found in document TR010025-000987 for Deadline 3. See Fig. A5 of 8.24 Groundwater Modelling 2018-19 Conceptual Model Review. This is only a basic model with 5 metre groundwater contours.

It is understood that hydrology monitoring has taken place on a 250m grid basis and that much of the data has been derived from extrapolating existing results rather than real time monitoring.

It may be adequate for abstraction borehole assessment but it is certainly not accurate enough to assess groundwater changes of a few centimetres that could affect preservation of Blick Mead organic archaeology.

The modelling contours inform us simply that Blick Mead groundwater levels lie between 65m and 70m AOD during typical high and low groundwater level periods. At least an order of magnitude improvement in accuracy would be required to assess the situation at Blick Mead satisfactorily.

Surface water run-off is proposed to be balanced to current levels for Blick Mead. This means that the current situation of road run-off flowing onto Blick Mead is to be taken as the baseline. The scheme proposes to ensure an equivalent surface area of road can run-off to Blick Mead.

My first concern is that Blick Mead is an extremely sensitive site and the pollutants found in surface water run-off are far from ideal, with oil and fuel inevitably leaking from vehicles along with other material falling from vehicles or being thrown out as litter. Blick Mead deserves better than this.

My second concern is that with the best will in the world drains can become blocked through accumulation of debris, storms washing silt, fallen branches and litter into them or through lack of maintenance and regular cleaning. Given the longevity of the unique organic archaeology, this seems to be a short sighted view that puts Blick Mead in the line of negative hydrological impacts and pollution.

I note that Blick Mead is down gradient of both the Eastern portal and Countess Flyover and very much at risk of any adverse conditions. It is of particular concern that any slurry that escapes from the construction process could end up here. Leaving construction details to a contractor would result in added uncertainty for this unique location.

There appears to be considerable disagreement between Highways England and Blick Mead archaeology team over what has happened and what was agreed regarding hydrology monitoring.

Highways found no evidence of perched water when installing bore holes.

It is understood that when an unauthorised contractor entered the site to install another borehole, the material removed was disposed of under Waste Transfer Licence. In other words it was dumped.

This would have been of great value to any Archaeology Department and illustrates the disregard being shown for one of the most important archaeological sites in existence anywhere. At the same time Bentonite was used to seal the hydrology monitoring equipment and further contaminate the site.

It is likely that further Mesolithic archaeology remains to be discovered in the area, including possibly under the embankment of the A303.

De-watering poses further risk but some de-watering is still being called for, with Highways England attempting to play this down rather than rule it out.

The warm springs at Amesbury Abbey do suggest that water is rising here and that groundwater rather than surface water is what has preserved Mesolithic organics. As such any changes to the hydrogeological situation are of grave concern, as are the effects of any surface water pollution.

ISH 3 Landscape and visual effects and design

7 June 2019

Section 4.ii Design of Matrices

The methodology of producing matrices relies on judgement rather than scientific method. It is not open to public scrutiny and shows signs of bias towards a presumption that the scheme should go ahead.

It is perhaps not surprising that assessments are invariably found to produce no significant adverse effects and that advantages are found to outweigh disadvantages, as the matrices and perceived outcomes can be drawn up to suit.

For example, Table 1 of the HIA considers the scheme will have a large beneficial effect on The Avenue, yet it will look down on tunnel portals and new approach roads, it isn't really visible on the ground anyway and there is no prospect of restoring the full length. However, ascribing such a large beneficial effect to restoring it adds a distorted weighting towards the scheme going ahead.

Section 4.v Photomontages

The photomontages of the Western Portal area appear to have been produced from Hill Farm as very little is seen from this angle.

Views of the large embankments to the north of Winterbourne Stoke as seen from Cherry Lodge would give an overall perspective of the impact.

Views of the constructional compound and slurry treatment plant as seen from Longbarrow Cross Roads Group would be informative.

Views of the Eastern Portal from Vespasian's Camp, or failing that from the lay-by on the A303 just to the west of the portal looking down on the approach roads would have been helpful.

Generally, photomontages seem to have been produced from viewpoints that gloss over the impact of the scheme.

Section 4.vii Landscape Scheme

As with so many aspects of the scheme, there is concern that details of the landscaping being left to a contractor means full public scrutiny is avoided. Although consultation with stakeholders may take place, the main stakeholders seem to be in favour of the scheme and in any case consultations can be ignored.

Section 5 Landscape Character

The landscape is largely unchanged from prehistoric times. The current A303 closely follows the landform with only minor interventions.

This scheme will be a huge intervention on the landscape as a whole and will result in severe irreversible changes. Cuttings and Tunnel Portals cannot be removed at a later date.

It will divide the eastern and western areas in a north-south direction to a much greater extent than at present, particularly around the Longbarrow Cross Roads area.

The constructional compound and slurry treatment plant will have a severe impact on the area and the land used for these may not ever fully recover. It is still not clear what method, if any, will be used to remove naturally occurring radioactive material from the Phosphatic Chalk.

The tranquillity of the western area of the scheme will decrease considerably as there will be greater volumes of faster 70 mph traffic on raised embankments that will be heard all the way from Winterbourne Stoke to Shrewton.

English Heritage welcomes the removal of the A303 at the stones, but here they are conflating OUV with financial value. The scheme does not consider the OUV of the WHS as a whole.

The A344 has been removed as called for in the statement of OUV.

The A303 has a lesser effect on Stonehenge. It is the volume and speed of traffic on it that has some impact. A lower speed limit could help here, reflecting the way traffic slows on the approach to Stonehenge anyway.

An alternative route outside the WHS could be provided for those who wish to make progress rather than to enjoy the view of the stones.

Highways are happy to point out that bound surfaces constructed within the WHS should be no more than 3 m wide, yet a four lane dual-carriageway is surely a bound surface within the WHS!

Section 6.i, 6.ii Visual Receptors

The Countess Flyover will intrude on the setting of Countess Farm and listed barns and will result in traffic having views into the upstairs windows at Bowles Hatches.

Amesbury Abbey will also be badly affected by the Countess Flyover and by the Eastern Portal, which will directly overlook Vespasian's Camp, particularly in winter when there is little leaf cover on the trees.

The setting of Stonehenge is affected by a concrete wall that is seen to sit just below the stones when viewed from Byway 12 to the north. The military sites at Larkhill and Boscombe Down, which are seeing ever more development, also intrude on the setting more than the A303, yet none of these are considered for removal.

The dumping of treated slurry on land close to Parsonage Down will have a negative impact on the area. It would take a very large stretch of the imagination to call this a nature reserve.

The placing of high level embankments around Winterbourne Stoke will have a severe effect on the northern setting of the village, especially on the farm at Foredown House.

Section 6.iii Night Sky

Both the raised Countess Flyover and particularly the embankments around Winterbourne Stoke will result in high level traffic shining headlights across the landscape. In addition traffic volume and hence light can be expected to increase considerably.

This will result in a negative effect on viewing the night sky. Even where there is no direct line of sight of traffic there will be more background light, as atmospheric effects will cause the artificial light to refract and reflect.

Putting the road in a cutting will have only a minor effect on improving matters. I'm sure everyone is familiar with the glow that can be seen in the night sky when looking in the direction of a town or city, even when the lights themselves aren't visible.

Night time traffic on the A360 is comparable to that on the A303 and this will not change. The single biggest intrusion on dark skies in the landscape comes from the street lighting at Longbarrow Roundabout. This could be greatly improved with a design that shades the lamps so they light up the road without lighting up the sky as at present, or indeed by removing the artificial lighting altogether.

More generally, Stonehenge has long been associated with astronomical observations.

The position of rising and setting of bright stars, as seen from the stones at particular times of year, changes slowly over many lifetimes. It is likely that at least some of the barrows visible were positioned to mark such stellar alignments at the time of their construction. However any modern interpretation of this is hampered by the fact that we aren't allowed inside the circle.

As such, effects on the night sky are largely general issues of seeing within the WHS. This could be improved by diverting the road away from the WHS.

Section 8.i Overall Vision

The need for early consideration of crucial design elements is not being adhered to.

The long term future of a tunnel is unclear. The proposed lifetime is barely 1% of the known history of human intervention in the landscape.

The effects of Climate Change are not being taken seriously. Politicians and planners need to listen to science and scientists. A 16 year old schoolgirl could tell you that.

Changing transport strategy should look to moving away from cars in favour of improved public transport.

A journey is about travelling through a landscape, not just arriving at a destination in the fastest possible time.

The most crucial element of the scheme, the tunnel, is not being fully examined. There is a very real danger that a tunnel cannot be satisfactorily built, or that construction costs will spiral out of control.

The advice of the UN and ICOMOS UK is being ignored, although great importance is being given to the interpretation and frequent misinterpretation of the UN Statement of OUV.

Section 8.iii Dangers of leaving the design to the contractor

Leaving design details to a contractor puts them beyond the public scrutiny of the Examination. This is most alarming with the key feature of the proposal, a tunnel through the WHS.

The vicinity of Stonehenge Bottom has very weak Chalk, Phosphatic Chalk and numerous fault zones.

It has open channels that may be full of semi-impermeable material which will empty during boring leaving open voids.

The structure of the Chalk is not well understood, as illustrated by the on-going drilling of core samples.

Tunnelling here may lead to collapse of the rock above the tunnel.

The worst that could happen to a contractor is that they go bankrupt and are wound up.

The worst that could happen to Stonehenge is the destruction of the landscape on which it sits.

The method of tunnelling should be fully examined.

ISH 4 Flood Risk, Groundwater and Geology

11 June 2019

Section 5.1 Groundwater Modelling and Monitoring

Please see my comments regarding Blick Mead for ISH 2 on 6 June 2019.

Highway's England's hydrology monitoring appears to be concerned with general water levels and abstraction boreholes, rather than the small changes that could affect preservation of Mesolithic archaeology at Blick Mead.

Modelling is based on extrapolation of data rather than actual readings.

Recharge of water levels during winter is considered just as important as the effect of drought on summer lows.

There is particular concern for the effect of groundwater run-off from the road, with the associated pollution.

There is concern for any leaked material from tunnelling washing onto the site.

Drainage systems can become blocked.

Any construction below the level of Blick Mead could affect the hydrology.

Consideration should also be given for the scientific method used in producing models, including the motives of whoever funded the work.

Section 5.2 Construction Vibration

Chalk is a fragile rock that cracks and fractures easily.

Tunnelling vibration will result in additional fracturing along lines parallel to the tunnel route.

This will create additional flow pathways away from the vicinity of the tunnel portals towards the low point at Stonehenge Bottom.

The result will be de-watering of the aquifer in these regions, with implications for farm boreholes and the vicinity of Amesbury Abbey.

Section 6.1 Flood Risk Assessment and finalised hydrogeological reports

The hydrogeological reports submitted to Deadline 3 are based on a 250 m grid pattern and 5 m water level contours. They are not accurate enough to assess Blick Mead.

Section 6.5 Road Drainage Strategy

The maintenance of drainage infrastructure is of great concern, as flood run-off from the tunnel and flyover will flow towards Blick Mead.

Not enough detail has been shown regarding drainage strategy and maintenance.

Given that silt, storm damaged trees, litter and lack of maintenance could all affect drains around Blick Mead, strategies that would ensure any overflows are kept well away from this area should be adopted. The presence of an impounding sump for pollutants in the tunnel gives rise to further concerns over how the system would start up and operate in the event of emergency and what might happen to contaminants if something goes wrong, such a drain becoming blocked.

Section 7 Contamination

Regarding the treatment of Phosphatic Chalk:

What process will be used?

Where will the treated material go?

Will any of the material deposited east of Parsonage Down or elsewhere within the scheme contain radioactive isotopes and if so, which ones?

What are the dangers to people and wildlife of any such material released as airborne particles, or into the water environment?

How will the treatment area be restored?

I am not aware of any of these questions being answered.

Section 8 Waste Management

Slurry removed from the tunnel may be dried but will become wet again when deposited and is likely to be compacted by its own weight and the machinery used to deposit it.

It is likely to create an impermeable layer with implications for drainage.

A large area around Winterbourne Stoke will be degraded by what the Application considers to be essential landscaping. Why is this essential landscaping?

The road embankments and other landscaping are required to dispose of the large quantity of material removed from the tunnelling and associated cuttings.

This will require a large amount of good and diverse farmland to be turned into a Chalk wasteland that will take many years to even begin to recover. The agricultural value will be lost.

The Application may call this habitat creation, but any area could be called a habitat.

This will be a poor habitat compared to what is there at present.

ISH 5 Noise and vibration, health and wellbeing

12 June 2019

Section 4 ES chapter 9

We were shown a map of relative changes to noise levels as predicted by the Applicants modelling, ref. ES fig. 9.4.

Noise in the Amesbury area appears to be under-represented given that a flyover is proposed for the Countess Roundabout. Traffic volume would increase with greater road capacity and speeds would be up to 70 mph at higher level.

Winterbourne Stoke will experience a constant drone of traffic noise from the higher traffic volume at higher road level. Although there will be some benefit to the centre of the village, overall noise levels around the parish will increase, with Shrewton also being affected.

Tunnels are an unpleasant place to drive and the traffic noise will be reflected by and contained within the tunnel walls. Assessment of noise within the tunnels has not been considered as part of the model.

Noise other than traffic has not been considered either. A presentation by Clive Bentley suggested that visitor noise is greater than traffic noise around Stonehenge itself, with traffic adding only 1 dB to overall levels.

It was pointed out that Mr Bentley's work had not been peer reviewed. I pointed out that the same was true for much of the Application. The scientific method should include results that can be independently verified, as well as a consideration of who funded the research and what their motivation might be.

Paul Brown QC for Wiltshire Council pointed out that they had peer reviewed the Application. The trouble here is that Wiltshire Council and the Applicant are hardly independent, both parties support the scheme. Proper independent peer review is called for, although as much of the data and information that informed the Application has not been made public, this is not possible.

It was pointed out that traffic noise reduces near Stonehenge during busy periods as speeds reduce. I noted that a reduction in speed limit would have the same effect.

Section 5 Noise Impacts and Mitigation

Sound barriers 1.8 m high at Countess Flyover will not stop all noise.

Traffic speeds will be much higher, volume of traffic will be much higher and traffic will be at a higher level.

This will negatively affect the whole of Amesbury, especially nearby homes including Countess Farm, Amesbury Abbey and Bowles Hatches.

Vespasian's Camp will have traffic noise amplified by the topography of the portal and approach road cutting.

The high level dual carriageway with 70 mph traffic will result in increased noise levels to the north of Winterbourne Stoke. This will have a particularly negative effect for Foredown House, but increased noise will be heard as far away as Shrewton.

Section 6 Vibration Impacts and Mitigation

If the DCO goes ahead as proposed, it will be a *fait accompli* for the authorities, with no further need to listen to public input into important decisions.

There is no real suggestion that the scheme is in the wider interest of the public, with very strong opposition for some aspects, particularly the tunnel and the loss of free views of Stonehenge.

The proposed mitigation for archaeology appears to be to allow sifting of sample areas, the amount to be determined by Wiltshire Council in consultation with other heritage stakeholders.

Archaeologists have called for 100% sifting of the area to be lost, but prefer the scheme to not go ahead as proposed. It seems clear from the expressed views of Wiltshire Council that only a sample will be sifted, perhaps around 10% of the land take, with the remaining archaeology, including possible burials, to be bulldozed.

As such, this is the last opportunity for people to raise concerns about levels of archaeological sampling before decisions on mitigation of archaeology are taken behind closed doors between Wiltshire Council and the heritage bodies.

Section 7 Wellbeing including Spirituality

The spiritual value of Stonehenge relates to the whole landscape.

It is not just the stone circle and not just the surface features.

Sacred springs that flow warm water year round provided water for people and animals at the end of the last Ice Age.

Animals provided food for people and abundant flint provided tools to butcher them, as evidenced at Blick Mead.

There is continuous evidence of habitation at Amesbury Abbey going back almost 10,000 years, uniquely anywhere in Europe.

The Chalk aquifer is the life blood of this landscape, which is the cradle of western civilisation.

A tunnel through the aquifer would be a desecration of this spiritual value.

ISH 6 Traffic and Transportation

13 June 2019

Section 3.2 Traffic Growth Predictions

Highways England predict a 1% annual growth in traffic on the A303, with 2/3 attributed to population growth. However I question whether it considers that the rate of growth is slowing following the recent referendum result?

Beyond that, it should be noted that traffic volume expands to fill the road capacity available. As such the scheme contradicts the needs of the on-going Climate Emergency.

Section 3.3 Time Savings

We learnt that Highways England's model for delays at Stonehenge uses the fastest journey times as a baseline, with the suggestion that this may have been on Christmas day. It seems to me that the quoted average speed of 95 km/h, or about 59 mph is unrealistically fast given that there are two roundabouts, one with traffic lights, as well as a 40 mph speed limit through Winterbourne Stoke. The time saving model is likely to be based on vehicles exceeding the speed limit.

Sections 4.9, 4.10 and 4.11 Byways 11 and 12 (AMES 11 and AMES 12)

Byway 11 is used to park vehicles off the A303 while visiting the Stonehenge landscape.

There is light rutting of the surface at present and the route is useable.

Severing the links to Byway 12 and to Amesbury would mean traffic entering from Lake and driving the full length.

Vehicles would then need to turn around with likely deterioration of the surface, congestion and possible trapping of vehicles.

This would require more maintenance and may lead to a proposal to downgrade Byway 11.

Vehicle rights exist along the A303 and should be maintained.

There is already some suggestion of allowing disabled drivers, motorcycles and agricultural vehicles to continue using the route.

Byway 12 is challenging south of Normanton Down. A link to Byway 11 would make for a better through route for cars, vans and campers.

Wholesale and unnecessary changes to the Public ROW network as part of a road scheme sets a dangerous precedent, as does separating motorcycles from other users.

These proposals discriminate against Byway users. The statement of OUV does not seek to remove all traffic from the A303, it simply seeks a solution.

Section 4.14 Byway 1 Amesbury (AMES 1)

I do not consider turning onto Byway 1 from the A303 westbound to be particularly dangerous.

There is currently access from the A303 and I question whether there have been any incidents that have resulted in accidents?

I note that there are a couple of caravans parked at the side of the route which also passes a military base at the southern end. I wonder if these could be reasons for the proposed closure.

Section 7 Alternative Routes

Although nobody made a presentation for route F010 through the Upper Woodford Valley, it is worthy of consideration. Although there would be increased disturbance to some properties, the same can be said of the current Application.

The 'Parker Route' based on plans by Balfour Beatty has considerable merit and could link with other routes such as the A30 and A36 to form a Salisbury bypass.

I drew attention to a northern route outside the WHS, as highlighted in Annex A to my Open Floor Summary. This was treated dismissively as probably being in the range of northern routes considered by the Applicant. However those routes all cut across part of the WHS which my suggestion does not.

It includes a Winterbourne Stoke bypass as well as a bypass for Shrewton and Bulford, two villages most affected by rat-running. The suggestion here is to use the Packway at Larkhill, which is a wide open road that was surely used as a main east-west route at some point, given the name.

Larkhill is an army camp that has seen considerable development in recent times. However this shouldn't be seen as an absolute reason to dismiss the idea. Even using the existing single carriageway could take a lot of traffic away from Stonehenge while relieving rat-running from surrounding villages.

Given that the Examination is tasked with finding the best solution, I feel that more attention should be given to considering alternatives.

These should include surface routes outside the WHS and the possibility of building a simple Winterbourne Stoke bypass without the need for huge embankments to dispose of tunnel excavations. Sections of tunnel under sensitive areas outside the WHS could also be looked into.

Section 8 Cost Benefit Appraisal

I consider the method of ascribing monetary benefit to various heritage assets as part of the appraisal to be rather dubious, particularly given the proposal to destroy huge swathes of the WHS as part of the scheme.

I wonder what negative value has been ascribed to users of the A303 who would lose sight of the most fabulous view in southern England and instead be forced into the deep and unpleasant experience of driving through a tunnel?

Other Matters – The Wiltshire Council Amendment

It is understood that Wiltshire Council is seeking to amend the DCO with a proposal to close a large number of Byways to motor traffic.

I draw attention to the Wiltshire Council Comments on Responses to the ExA's Written Questions, document TR010025 - 001016. Responding to the Applicant they say:

The cul-de-sac, from which there is an excellent view of the Stones themselves and the surrounding landscape has, in the Council's view, the real prospect of being used for camping by travellers and short-term visitors, as well as providing a free car park giving direct access to the new Restricted Byway on the line of the decommissioned A303 and the permissive access allowed to the wider landscape of the WHS. Cumulatively, these new uses will significantly increase the number of vehicles using this part of the WHS, within direct view of the Stones.

I say this is nonsense, it is clear that any diversion of the A303 away from Stonehenge will significantly decrease the number of vehicles using this part of the WHS.

I note that as the local authority with responsibility for minor highways, including Byways, it is Wiltshire Council's responsibility to maintain these routes, a duty they appear to be shunning.

In terms of attitude towards travellers, in so much as travellers can be thought of as a distinct group the proposal is racist.

I note that an exception for motorcycles is proposed.

My view is that this is not a necessary part of any A303 improvement scheme.

It is within the capability of Wiltshire Council to apply for a Traffic Restriction Order (TRO) independently of the Application.

Given that a previous TRO has been quashed, the amendment is effectively a request for the Secretary of State to overturn a High Court ruling, whilst appealing the Trail Riders Fellowship.

There are legal implications that go way beyond the Application.

I consider that the Wiltshire Council Amendment should be dismissed.