

**From:** [Stephen Stacey](#)  
**To:** [A303 Stonehenge](#)  
**Subject:** A303: comment on submissions by National Highways  
**Date:** 31 March 2022 11:56:26

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Dear Sirs

I remain deeply concerned by the proposal to drive a short tunnel through the WHS landscape at Stonehenge and urge its re-examination before the Secretary of State determines afresh. My concern is sharpened by the prospect of the loss of WHS status for a site that includes Avebury, in which I live. If that happens, there will be a very considerable adverse impact on our village and its surroundings and on residents and their way of life.

More particularly:

1. I am not convinced that the modest changes made by National Highways to their scheme will persuade UNESCO's World Heritage Committee that the merits of the proposal outweigh its demerits. The Committee's decision 44 COM 7B.61 of 2021 is crystal clear. Much more is expected from National Highways than has been offered.
2. National Highways seems not to have addressed the Secretary of State's finding that the western cutting area has an impact on the site that is "significantly adverse."
3. Assessment of alternative routes has never been adequate. It has not been demonstrated that a southern bypass route or a combination of improvements to other existing routes would be cost-ineffective. Indeed it seems likely that an alternative route or routes would be less expensive to construct and - not less important - to maintain.
4. The costs for construction and for carbon assessment have not been updated.
5. The impact of the scheme must be considered in the context of the 2021 IPCC report requiring action urgently to exert downward pressure on GHG emissions, not least from vehicles. Increasing and accelerating fossil fuel-using vehicle flows along the A303 are inconsistent with that objective.
6. The tunnel as projected also appears inconsistent with measures to enhance nature recovery introduced by the Environment Act 2021.
7. The tunnel remains a 20th century solution to a 21st century challenge. Rapidly changing mobility trends, not least the electrification of vehicles, will significantly reduce their adverse impacts on the environment. The alleged benefits of a road tunnel to the economy of the west of England have been exaggerated. Whatever merits the proposed tunnel might have in restoring the tranquillity of the site are massively outweighed by the destruction and damage it will wreak.

An independent assessment, conducted before the Secretary of State redetermines the proposal and published, is essential if the government wants there to be public confidence in the outcome.

Yours faithfully

Stephen Stacey

