

Reference Number: 20017073 / ANON-BABJ-X8N8-5

As a registered interested party, I have the following response to the Sec. of State's request for comments on the A303 Stonehenge Tunnel Project.

1. The Examining Authority recommended that the scheme should not go ahead after a lengthy consultation with interested parties, of which I was one.

Despite this recommendation, the DCO was granted.

2. A Judicial Review was held and the findings of the Judge were that the Sec. of State had acted irrationally and had erred in law.

The Judge quashed the DCO.

3. Despite this, the Sec. of State then decided to "redetermine" the application.

It is unclear upon what basis the Sec. of State has the legal right to do so.

4. The Applicant has not taken heed of UNESCO's 2021 WHC decision, and has made no material changes to the proposal in light of it.

5. The Applicant has not taken into consideration the "significantly adverse" impact of the western portal, cutting and dual carriageway on the World Heritage Site's Outstanding Universal Value.

6. No attempt has been made by the Applicant to properly consider (under the same terms as for the proposed route) any alternative routes that would not damage the WHS.

7. The outline construction costs have not been updated in light of current circumstances. They will be far higher than previously stated and so the cost/benefit margin is now considerably tighter than originally envisioned. In fact, it is certain that the scheme costs will now outweigh the originally stated benefits.

8. No consideration has been made of the updated Climate Impact / carbon costs in light of the Govt's present policy in this area.

9. No attempt has been made to provide a rational mechanism for interested parties to identify where project documents have been revised by the Applicant. It would have been a simple matter to enable “track changes” in the files so that areas that have been modified are able to be compared with original text.

10. National Highways are presently conducting market research via a third party presumably in an attempt to generate a positive view of the proposals. The data/conclusions relating to this exercise have not been made public.

11. The land which is designated for the Eastern Portal and approachway (the “BowTie” field) has recently changed ownership, and has been acquired by the National Trust. Nowhere in the Applicant’s documents is there any reference to this, nor to what mechanism (if any) has been agreed whereby this inalienable land is to be sacrificed to the scheme.

12. The facts of this scheme concerning damage to the OUV of the WHS remain unchanged. OUV is, of its nature, indivisible and damage in one area cannot be mitigated by alleged benefits in another. Serious, adverse, harm will result if the scheme goes ahead in its current form.

13. The situation overall has shifted markedly from when the Examining Authority reached their decision in 2019/20, and it would be rational - indeed it is vital - to commence a new Examination where the outcome could be determined on the basis of the actual proposal as it is now.

I call upon the Sec. of State to instruct the Planning Inspectorate to begin a new enquiry in front of an independent panel before any “redetermination” of the application is carried out.

Simon Banton

