

Your Ref: TR0 10025



4 April 2022

Dear Sir/Madam,

Re-determination of the Application by National Highways for an Order granting Development Consent for the A303 Amesbury to Berwick Down.

Planning Act 2008 and the Infrastructure Planning (Examination Procedure) Rules 2010

Thank you for writing to me on the 23 February 2022, to inform me of the Secretary of State's request for comments relating to the re-determination of the application for the A303 Amesbury to Berwick Down project.

I wish the following comments to be considered.

National Highways has not:

1 made any changes to the Scheme to take the 2021 World Heritage Committee Decision into account;

There is also a continuing increase in understanding of the site and re-evaluation of its historic context from site research that is carried out and the subsequent follow up detailed research that is made possible, which has been publicly reported. This has served to highlight an increased importance of the site as a key element of the national history of Britain. It suggests the currently protected area of international interest may possibly need to be extended as the understanding of how Stonehenge was progressively developed and used, and the communities who built, used and lived on the site and in close proximity in the surrounding area to the central circle.

Should this prove to be the case, given the exceptional role Stonehenge holds internationally, there may be a planning need to provide for some reduction in the existing developed area to allow this to be protected and understanding expanded.

2 acknowledged that the Secretary of State found the Scheme's impact on the proposed western cutting area would be "significantly adverse";

3 fully assessed alternative routes less damaging to the World Heritage Site;

For example, a southern bypass route would be cheaper, even if there might be some problems with it.

Alternatively, a longer tunnel could reduce impact on the World Heritage Site if adequate clearance was provided to pass beneath the Heritage Site, ground movement minimised and ventilation shafts avoided through the use of forced ventilation.

4 explored alternatives to hard engineering solutions in the context of safeguarding and enhancing the World Heritage Site;

For example, there has been no consideration given to a package of measures to reduce road traffic, road emissions and improve access to the South West.

Vehicle tyres have been found to be a significant source of micro-plastic particulates that have been found to be absorbed deep inside the human body including within internal major organs. The health effects of this are currently subject to a range of contemporary medical research projects.

The existing road has existed on the current alignment for a long time and any damage to the site will be limited in area and depth.

As with many roads, the existing section of the A303 relevant to this application has adequate capacity. Demand causing a delay, only occurs for part of the time it is available to be used each year.

For trunk traffic any increase in capacity for the length subject to this application will not resolve capacity issues further along the A303 but would be likely to displace and increase delays further along the route.

The uniqueness of the site appears not to have been appreciated by the promoters of the scheme. When I have passed Stonehenge by road, I have always felt privileged to have an opportunity to see this from different viewpoints.

There is a unique feature of the current road that the proposal would remove.

An alternative could be to create a local charge for passing through the historic site using the current road. This is pertinent, as this is such a unique site, internationally recognised. Given the context of global warming, commitments the government has made to reduce energy use, this could be a site-specific means of managing and reducing peak traffic demand. Even if a specific statutory basis was required, it could be a way of providing an income stream to assist archaeological research, fund associated education both on and off site and management measures for the area that requires protection. Proven technology exists to implement such a scheme that has been used in London and other cities without interrupting vehicle flow.

Some London Boroughs have implemented 20 mph speed limits for reasons of both road safety and air quality. These have achieved a high degree of compliance despite being controversial at the outset with some sections of the motoring population. This has demonstrated the ability to make significant behavioural change to achieve environmental benefits without a significant change to the existing road network.

A national change to change the modal split from road to rail travel may be necessary to achieve commitments that have been made to reduce national long term energy use but as yet without an implementation plan.

5 updated the scheme construction costs; nor

6 updated the carbon assessment and costs.

Other changes since the Examination closed:

- concern for climate change has increased with the latest Intergovernmental Panel on Climate Change report and the need to take urgent action to reduce emissions, not increase them as any new Stonehenge road scheme would; and
- the Environment Act 2021 sets new ambitions around nature recovery.

Re-examination of Development Consent Order

The omission on current cost estimates, UNESCO's position and new information since the Examination closed in October 2019 comprise compelling grounds for a re-examination by an independent panel before the Secretary of State redetermines an application for a DCO for the very same road scheme.

I should be grateful if you will ensure arrangements are made for this to take place.

Yours faithfully,

RF Bainton

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