

From: [REDACTED]
To: [A303 Stonehenge](#)
Subject: A303 Comments on National Highway's tunnel application
Date: 04 April 2022 15:30:47
Attachments: [Screenshot 2022-04-04 at 14.18.19.png](#)

Dear / Sir Madam

I have reviewed National Highway's updated information in support of the Stonehenge Tunnel DCO ahead of the Secretary of State's re-determination.

I am a local resident, with a keen interest in the Stonehenge World Heritage Site landscape, of which I make substantial use.

My understanding is that the original application was overturned by legal challenge, due to its failure to address:

1. Sufficient consideration of alternative routes
2. The scheme's impact on all parts/components of the WHS landscape, not just Stonehenge. Such impact might lead to it being removed from the list of World Heritage Sites.

To consider these in turn:

1. I do not consider that the updated material represents a serious attempt to re-evaluate the route choices: it appears almost axiomatic to the reports authors that a tunnel is best. The additional costs, disruption and energy requirements for such a bored-tunnel approach appear under-represented. There is much re-statement of the original rationale, at the expense of re-evaluation, which I think is the "exam question".
2. I consider National Highways attitude to ICOMOS to be dis-respectful and dismissive. This is reflected in the attached statement. Failure to engage them adequately in the scheme from the outset as a valid stakeholder has proved divisive. Placing too much emphasis on the Stonehenge monument itself has led to its impact eg around the Western Portal / cut-and-cover section being under-valued in the assessment since the start, and positions now appear polarised.

I have three further comments:

(a) **Benefits Case.** Have the projected vehicle volumes been re-visited given UK economic forecasts as of Spring 2022?

(b) **Cost.** Are the assumed inflation figures still valid? They are stated as within "estimating margins", but these surely could not have been envisaged at the time of original estimates. These inflationary pressures are affecting the construction industry both in terms of labour and materials charges.

(c) **Noise.** Mr Parody assured me in a consultation meeting in Amesbury, that the location of the iconic Stonehenge stones would become 'tranquil' as a result of the tunnel development. I remain to be convinced that 4 lanes of fast moving traffic 1.2km upwind, given the prevailing wind direction, will confer this benefit. It would be highly unfortunate (and not easily reversible) should this concern prove valid. And a great opportunity lost.

I would like there to be a road solution we can all be pleased with. This is not it.

Your sincerely

Stephen Cogbill



outcome for the OUV of the property

- 1.2.6 In relation to the weight that should be placed on the WHC's view, the Applicant's position remains as stated in its closing submissions [TR010025-001775-8.70, AS-146, paragraph 2.3.11], that the WHC is not a decision-making body set up to determine whether developments around the world are acceptable or not. Consequently, the views of the WHC should be treated as the views of a consultee, to be given appropriate weight by a decision maker. Any approach which treats the views of the WHC as determinative would be legally flawed and should be rejected.