

**From:** [REDACTED]  
**To:** [A303 Stonehenge](#)  
**Date:** 04 April 2022 22:10:14  
**Attachments:** [Response to Statement of Matters.docx](#)

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**A303 Stonehenge – Amesbury to Berwick Down**  
**Response to Statement of Matters issued 30 November 2021**  
**Public Consultation**

This consultation response is made by:

**Mr Robert Turner and Mrs Fiona Turner and family, trading as 'J & M Turner & Son'.**



This response to consultation is made as an owner / occupier of land that could be severely affected by the proposals contained within the consultation. As a fourth generation owner / occupying farming family, we have an intricate local knowledge, in particular a detailed understanding of the local geography, road network, landscape and ecology.

**Summary of response to Statement of Matters:**

Our representation is made in regard to two elements of the Secretary of State's invitation for comment. These elements are:

- The route of the proposed scheme.
- The Applicants' Commentary in regard to Biodiversity Net Gain.

**Applicant's response to the matters on which the Secretary of State invites further representations (Paragraph 2). Response to Bullet Point One – Alternatives**

The Applicants' response document claims that full consideration was given to all route alternatives. We believe this is incorrect. The process was biased towards the chosen alignment and plainly this route causes most damage to cultural and natural heritage.

The exact route of which was then (in 2017) considered as either 'Option 1S and Option 1N'. The applicant expressed that "*the assessment did not result in a clear favourite*". It is our strong view that this is incorrect.

We believe that several important considerations were either entirely overlooked in those early stages of the process or under evaluated in the assessment of 'Option 1N'. These factors are explained in more detail below.

The 'Option 1N' would be significantly more harmful and detrimental to the local area and community than the alternative southern route because:

- 'Option 1N' dissects habitat used by the Great Bustard (bird) – this species became extinct and has now been reintroduced into the local area (Salisbury plain) being its historic habitat. The bird has become a flagged symbol of Wiltshire appearing as an emblem on the county flag. The proposals build a road straight through the birds' habitat (seemingly regardless of its iconic status).

Selection of this route option should therefore increase pressure on this species and hamper the reintroduction programme. This would not be an issue with 'Option 1S' as the route

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would largely avoid relevant habitat. This has not been considered in the assessment / consultation document.

- ‘Option 1N’ would cause destruction to historic watermeadows at the point of bridging the River Till. No such loss would be an issue for ‘Option 1S’.
- ‘Option 1S’ would keep a longer part of the A303 further away the World Heritage Site (WHS). The result being a reduced visual impact and decreased light and noise pollution for this extremely sensitive and internationally unique site. Surely, this is decisive in the route selection?
- ‘Option 1S’ would deliver a finished scheme with more direct routes improving accessibility for local, tourist and military traffic. These routes will be less prone to congestion and better future proofed for increased traffic (particularly tourist). The level of disruption through construction will also be less.
- Route ‘Option 1S’ would affect less households and local businesses, both during and after construction.

These points were made in the non-statutory consultation of March 2017. As the process was non statutory, we believe that the counterarguments against the route ‘Option 1S’ was ignored.

**Applicant’s response to the matters on which the Secretary of State invites further representations (Paragraph 2). Response to Bullet Point One – Extension of the Tunnel.**

Whilst we remain strongly opposed the Applicant’s proposals in regard to routing, we agree that there should be no extension to the proposed length of the tunnel on the grounds stated by the Applicant.

**Applicant’s response to the matters on which the Secretary of State invites further representations (Paragraph 2) Response to Bullet Point Five – Any Other Matters. Biodiversity Net Gain.**

The applicant has stated:

*“In conclusion, statutory biodiversity net gain pursuant to the Environment Act 2021 is not required for the Scheme and so the developments relating to statutory biodiversity net gain do not affect the Secretary of State’s ability to re-grant development consent for the Scheme”.*

This response is disingenuous to the intentions of government and rules past in statute (but yet to take affect). The Applicant clearly takes the view that because they are not yet legally bound by these rules they can be flippant about the impacts of the scheme upon biodiversity. The chosen routing of the scheme will undoubtedly cause loss of biodiversity as opposed to gain. How could it not, when it is predicated on man made landscaping on an industrial scale, necessity the loss of wetland and other habitat?

The few benefits stated by the Applicant are wholly inadequate in the general picture and are further hallmarks of the Applicants unswerving support of a entirely inappropriate alignment.

END.

March 2022