

From: [REDACTED]
To: [A303 Stonehenge](#)
Subject: Response to request for comments from interested parties
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Attachments: [Redetermination A303 Stonehenge April 2022 final.pdf](#)

Please find attached our response to the matters raised in the consultation letter of 24 February

Please acknowledge receipt of this response

Yours sincerely

Mike Birkin

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Redetermination of A303 Amesbury to Berwick Down Project, Development Consent Order Application TR010025

Friends of the Earth South West further to representation by Mike Birkin, SW Campaign Organiser for Friends of the Earth, Interested Party [REDACTED]

Comments on National Highways submissions in response to the Secretary of State's call for further representations on his Statement of Matters.

The applicant, National Highways, apparently wishes the SoS to proceed with redetermination of the A303 Stonehenge scheme as though very little has changed since submitting their original application in October 2018.

The reality is that an enormous amount has changed. The context is so fundamentally altered that the SoS, unless he refuses the application, should invite the Planning Inspectorate to have the DCO re-examined by a panel of independent experts before making a decision about the A303 Stonehenge road scheme.

The policy and economic contexts have changed, and new information has come to light that was not available to the examination into the scheme. The Examiners' report published in November 2021 recommended refusal on grounds of damage to heritage, landscape and culture, and the Judgment of the High Court handed down in July 2021 quashed the decision to grant the DCO. Mr Justice Holgate found that the SoS unlawfully failed to consider less damaging ways of relieving the existing A303.

UNESCO's World Heritage Committee

Most significantly, the World Heritage Committee meeting of 2021

"Notes ... that in the event that DCO consent was confirmed [by the High Court], the property warrants the inscription on the List of World Heritage in Danger." [our emphasis]

This information was not available to the Examiners nor any of the participants in the examination into the DCO. [1]

Climate breakdown and transport

Concern about climate change has increased dramatically with the latest Intergovernmental Panel on Climate Change reports and the need to take

urgent action to reduce emissions, not increase them as any new Stonehenge road scheme would.

The applicant had been able to downplay the significant increase in carbon emissions that would be generated by this scheme because of the way National Policy had been framed, accounting for each road scheme in isolation while ignoring their cumulative impact. Even if this position had been tenable then it is no longer.

In April 2021 Government announced the new sixth carbon budget for 2033-2037 and set a new goal to cut emissions by almost 80% in 2035 compared to 1990 levels in an effort to reach Net Zero. [2]

As pointed out in our submission to the Examining Authority, the transport sector as a whole is the largest source of carbon emissions and these are not declining [3]

The case for reversing trends in traffic growth could not be stronger. Last year it was reported that 27% of the UK's total emissions came from transport, of which 91% came from road transport vehicles (2019 statistics). [4]

The applicant has continued to refuse to take into account these changes on the grounds that the NPSNN¹ is under review, thus until it is published next year the NPSNN that ruled at the time of the DCO application

*"... continues to have effect, therefore there is no change in the overarching policy context for highway NSIPs ..."*² (Redetermination 1.2 para 2.1.2)

Increasing carbon values

Mike Birkin's submission to the Examination in 2019 noted that

"In light of our climate emergency and the very rapidly changing scientific and policy context, it is far more likely that we are at present underpricing carbon emissions than that we are overpricing them. The climate emergency context suggests that the already high negative value attached to this scheme's carbon emissions are far from secure, and could be substantially higher."

¹ NPSNN: National Policy Statement for National Networks

² NSIP: Nationally Significant Infrastructure Project

This has indeed turned out to be the case. The figures have been updated, and they are substantially higher. Exact comparisons are difficult because in support of their application in 2018 Highways England presented only a cumulative negative value of emissions (of £86 million) and we cannot see what value was applied in any given year. However, it is clear that whatever values were applied in the 2018 appraisal, even the lowest range of updated values would start at around £100 a tonne (in 2023) and rise yearly thereafter. The 2018 appraisal used values that averaged around £44 a tonne. A correctly applied carbon valuation, using current figures supplied by BEIS and incorporated into Transport Appraisal Guidance [5], would therefore hugely increase the carbon cost of the scheme. At the very minimum the recalculated carbon cost would be so large as to entirely wipe out the scheme's supposed net economic benefit, as claimed in 2018, of £102 million.

Construction costs: Inflationary pressures

In the last 12 months the civil engineering industry has expressed concerns about construction inflation that will impact RIS3 (2025-2030) schemes. Causes are a storm of economic shocks and crises, wider inflationary pressures running at about 5%, and a fragile supply chain. These include material shortages caused by Brexit and new certification rules, compounded by the global pandemic. Industry experts warned DfT in November 2021 that road sector costs had already risen by 20% in the preceding 12 months [6]. This was even before war in the Ukraine had given a further twist to the inflationary spiral. In March 2022 suppliers warned that material quotes are “only valid for 24 hours” [7]

The inescapable conclusion of all the above is that despite National Highways' pretence otherwise, real world impacts have left the already fragile economic case for the A303 Stonehenge scheme in tatters.

- **The heritage valuation is rendered obsolete by the Examiners' findings of the “significantly adverse” impacts of the scheme and the very real threat of withdrawal of World Heritage Site status should the scheme go ahead**
- **The climate economic impact, as captured in the carbon cost, is likely several times worse than that assumed at the 2019 examination**
- **Construction costs have risen, and are now rising, at such a rate that it is impossible to predict what they will be at the outset of construction**

For these reasons we urge that the SoS redetermination should be to refuse the DCO. In the event that the SoS is minded to approve, the far-reaching nature of the changes we have outlined must surely demand a new DCO application and a new examination.

Urgent consideration for a package of alternatives

Failure to consider alternatives was a key factor in the quashing of the SoS decision to approve the DCO. However, the applicant has not attempted to produce alternatives to a scheme for which even the SoS found the heritage impact to be significantly adverse.

What stands out is the total absence of proper consideration of how to reduce the impact of road traffic on local communities for at least the last 30 years. The current scheme and its antecedents have been selectively promoted and allowed to fester, thereby blocking progress on lower cost and lower impact measures which could have given significant relief – and indeed could still do so whatever the fate of the DCO. This amounts to a dereliction of duty on the part of DfT and National Highways.

A package of non-hard engineering measures would be subject to none of the fatal flaws of the proposed scheme – excepting the risk of cost overruns, but here we would be looking at a budget of millions, not billions.

In keeping with government decarbonisation policy, and reflecting public concern for the world the next generation will inherit, this needs to be the moment when low impact, low cost, low carbon alternatives are embraced. Road management measures and modest improvements within the World Heritage Site should be trialled to inform an intelligent debate on scheme development as a matter of urgency. Indeed, Stonehenge could be a world leader in applying best practice in demand management and low carbon transport solutions. After decades of dither and delay, we need to see a package of measures piloted straight away. The following suggestions have been proposed by town planner Tim Hagyard [8]:

- **A low-speed pilot** for the use of the A303 could be **easily and immediately introduced**, assessed for its anticipated benefits in **reducing noise and disturbance**, followed by laying of ultra-quiet surfacing.

- A **local road charging** provision to manage congestion at peak times and generate green travel funds for walking, cycling, shuttle buses and improving the connection of the Stonehenge site with local businesses in Amesbury, Wiltshire Museum in Devizes, Avebury WHS and Salisbury.
- Local traffic management measures funded and monitored to reduce impacts on local communities, all with no risk of the unintended consequences of **'induced traffic'**.
- Retain an **inclusive solution** which enhances free public access and enjoyment of the monument on foot, by bicycle and local bus.

We do not put ourselves forward as advocates of any of the specific interventions listed here (although the general approach is one we do advocate); rather we wish them to serve as examples of the rich menu of innovative solutions which is on offer, and which would be far more fitting solutions to the pressing issues of the 21st century than would gouging a concrete trench through a “*prehistoric 'landscape without parallel'*” .

References

- [1] Paragraph 12 of UNESCO's [World Heritage Committee Decision 44 COM 7B.61 Stonehenge, Avebury and Associated Sites](#)
- [2] [UK enshrines new target in law to slash emissions by 78% by 2035](https://www.gov.uk/government/news/uk-enshrines-new-target-in-law-to-slash-emissions-by-78-by-2035)
<https://www.gov.uk/government/news/uk-enshrines-new-target-in-law-to-slash-emissions-by-78-by-2035>
- [3] [Written summary of oral submission by Mike Birkin, Friends of the Earth and Response to Examining Authorities' Second Written Questions from Mike Birkin, Friends of the Earth](#)
- [4] BEIS, 2020: [Greenhouse gas emissions by sector, 2019, by proportion](#) and BEIS, 2021: [Valuation of greenhouse gas emissions: for policy appraisal and evaluation](#) BEIS REFERENCE Ref <https://www.gov.uk/government/news/uk-enshrines-new-target-in-law-to-slash-emissions-by-78-by-2035>
- [5] [As set out in the TAG \(Transport Analysis Guidance\) data book, Table 3.4](#)
- [6] Highways Magazine, 25 November 2021: [Road sector costs rise by 20% DfT officials told](#)
- [7] Construction News, 30 March 2022: [Material quotes 'only valid for 24 hours' as inflation grips](#)
- [8] Tim Hagyard, 30 July 2021: [Respect Stonehenge – An Alternative](#)