

**From:** [REDACTED]  
**To:** [A303 Stonehenge](#)  
**Subject:** Please re-examine the Development Consent Order  
**Date:** 03 April 2022 22:30:04

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As a retired planning archaeologist I have more than 30 years experience in assessing development proposals in line with policy and caselaw which defines the impact on an archaeological site or complex and its setting as a material planning consideration. I have been responsible for writing national policies and designing areas for special protection.

This scheme has always threatened the integrity of a site of international importance, it involves partial destruction of the complex, for which proposed excavation is not acceptable mitigation and it has a visual impact within the World heritage site. Trying to hide the road is tacit admission that it should not be there!

It appears that no attempt has been made to the Scheme to make it acceptable and simply re-applying for approval of a discredited proposal shows a lack of understanding of the sensitivities that any new road scheme needs to demonstrate.

I make no apology for cutting and pasting a list of the previously stated criticisms, pointing out that beside failing to take the 2021 World Heritage Committee [Decision](#) into account (and thus showing total disrespect for this Authority, as for others) the applicant has not;

- acknowledged that the Secretary of State found the Scheme's impact on the proposed western cutting area would be "significantly adverse";
- fully assessed alternative routes less damaging to the World Heritage Site e.g., a southern bypass route would be cheaper even if there might be some problems with it, while a longer tunnel would reduce impact on the World Heritage Site;
- explored alternatives to hard engineering solutions in the context of safeguarding and enhancing the World Heritage Site – e.g. a package of measures to reduce road traffic, road emissions and improve access to the South West;
- updated the scheme construction costs; nor
- updated the carbon assessment and costs.

Given the increasing evidence of environmental damage from vehicle emissions, as well as from winning construction materials, since this scheme was proposed, it is becoming ever more clear that this the wrong solution and in the wrong place. This is an example of a situation where the idea of keeping the environmental cost as close to nil as possible must be set against the tired argument that we cannot bear the financial burden of a solution. Sometimes the environmental cost is unbearable and the financial costs are secondary. Cost is not a planning consideration and the decision should thus continue to be made, as before, in favour of preserving the whole complex and its setting.

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