

From: [REDACTED]
To: [A303 Stonehenge](#)
Cc: [Community Planning](#)
Subject: A303 Stonehenge Consultation Response
Date: 01 April 2022 15:11:20
Attachments: [220331 Stonehenge Consultation \(CPA\).pdf](#)

Please find attached the response from the Community Planning Alliance. Please don't hesitate to contact me if you need any clarification.

Thank you
Marj Powner



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Community Planning Alliance



Response to the A303 Stonehenge Road Widening Scheme

Thank you for the opportunity to comment on the National Highways documentation for this road scheme. The 32 documents are lengthy and technical, nevertheless, the Community Planning Alliance (CPA) is keen to contribute. We are sure you will agree that it is important for communities to be able influence proposals which will have a profound effect on a site of such national importance. Any inappropriate development will impact future generations of users of the site, potentially rendering the proposals unsustainable and unsound.

Our main concerns are:

- **UNESCO.** National Highways has not taken the 2021 World Heritage Committee decision into account when creating the latest set of proposals. This means that UNESCO may place Stonehenge and associated sites on the list of World Heritage in Danger, a shameful outcome for the United Kingdom.
- **Alternatives.** It appears that National Highways has not fully assessed alternative, less damaging routes, some of which may even be less expensive to implement. This lack of consideration of alternative options is also happening on other sites nationwide and must be addressed, especially given the potential benefits to the public purse.
- **Non-road alternatives.** Nor, given the need to reduce vehicle traffic and carbon emissions, has the Government focused on sustainable passenger and freight traffic to support travel throughout the region. Inconsistencies between supposed strategic aims and what is being pushed through the system are also impacting other road schemes, with local decision-makers following the lack of national leadership in increasing sustainable transport options. New roads should be the exception and should have robust justification (threatening the future of a World Heritage site cannot be defensible).
- **Carbon emissions & natural capital.** The expected resulting carbon emissions should be fully and transparently calculated. The natural capital value of the site should be fully and transparently assessed, with the resulting data included within the documentation. Decisions must be made on the basis of full and detailed information
- **Up-to-date evidence.** We cannot find evidence that critical information has been updated, such as the scheme construction costs and the carbon assessment (and associated costs). When decisions have to be made that have such far-reaching consequences, they must be made based on up to date, accurate and comprehensively complete information.

Furthermore, the Government has recently embarked on consultation about the targets that are associated with the Environment Act and also the Green Paper on Nature's Recovery. We would expect any new or amended proposals, particularly those that will increase carbon emissions, to demonstrate how the Government's ambitions will be impacted and specifically to take these important environmental initiatives into account. It is also highly inappropriate that consideration has not been given to increasing concerns about climate change, particularly given the feedback in the latest Intergovernmental Panel on Climate Change report.

We would urge that the opportunities set out in the recent report [REDACTED] are fully explored to ensure value for money and robust sustainable solutions, driven by the outcomes communities desire, not decisions based on outdated traffic models.

With all the above in mind, we believe there are compelling reasons to constitute an independent panel to review and re-examine all aspects of this proposal before the Secretary of State makes a decision which will have such major implications for current and future citizens, wildlife and natural capital resources, and the achievement of goals to tackle the climate emergency.

Should further information be required, please contact our Vice Chair, Marj Powner on communityplanningalliance@mail.com, or at [REDACTED].

Community Planning Alliance:

The [REDACTED] is an umbrella group, bringing together over 590 campaigns against inappropriate development nationwide. We represent a vast number of citizens, supporting them through provision of planning and other guidance and lobbying for change, to create a more level "playing field" in the planning ecosystem.