

**From:** [REDACTED]  
**To:** [A303 Stonehenge](#)  
**Cc:** [REDACTED]  
**Subject:** Redetermination of A303 Amesbury to Berwick Down Project, Development Consent Order Application TR010025  
**Date:** 01 April 2022 18:34:39

---

Dear Planning Inspectorate,

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

### **My position**

One of National Highways' (NH) main aims of the A303 Stonehenge road widening project was to "conserve and enhance" the World Heritage Site. The implication of this aim was, inter alia, to improve the experience of visitors that arrive via English Heritage's Visitor Centre. Thus, the main thrust of my representation about the A303 Stonehenge road widening scheme in 2019. Its importance to the scheme cannot be overstated. After all, NH's business case hung on the high value based on survey results in order to calculate a contingent valuation – i.e. contingent on the value that visitors were prepared to pay if the scheme were implemented. The scheme had been explained to respondents in terms of the experience when visiting the Stonehenge Monument and its immediate environs, but not the scheme through the World Heritage landscape as a whole. Based on my informal case study during the busy Easter holiday period that I described in my representation, my key conclusion was that, at times of high visitor numbers, the road and its traffic were minor visual and/or aural intrusions compared to the direct discomfort of a large number of noisy visitors, together with the infrastructure associated with shuttling visitors to and from the visitor centre serviced by a continuous stream of large coaches. In my case study the burying of the road was considered of modest benefit. The price tag of £2bn was considered out of proportion to the benefit. These conclusions were reinforced by responses by duty wardens who had not received complaints from visitors about the intrusive traffic noise.

Had visitors in my case study, and indeed those surveyed for National Highways' DCO, been told of the irreversible harm to cultural heritage to be done elsewhere on the World Heritage Site the results of the contingent valuation might have changed to the extent that the already weak business case might well have vanished.

Indeed, such was the damage elsewhere on the WHS, that the Examiners' report recommended refusal: when set against the "*significant harm to the landscape character*" (ExA 7.2.53/54) caused by the tunnel portals, deep cutting, and vast

junction of motorway standard on the boundary of the World Heritage Site, the aim to “*conserve and enhance*” fails. In weighing up the benefits, the Examiners concluded that “*there would not be an overall benefit to cultural heritage*” and “*would not achieve the proposed development’s objective to “conserve and enhance” the World Heritage Site.* (ExA 7.2.17).

Nevertheless, despite these objections, National Highways has represented the A303 Stonehenge road scheme virtually unchanged. **Therefore, my objection still stands and the scheme remains unacceptable.**

I would like to record my support for other objectors I heard at the Examination in 2019, principally the specialist objections by the Stonehenge Alliance, the Consortium of Archaeologists and the Blick Mead project team, the Council for British Archaeology, ICOMOS UK, and the Wiltshire Archaeological and Natural History Society covering in great depth and erudition the multiplicity of issues.

### **My comments on submissions by National Highways:**

1. NH side lines UNESCO’s firm objection. In relation to the weight that NH thinks should be placed on the WHC’s view, NH claims that the very body that has threatened to place Stonehenge on the list of World Heritage in Danger if NH’s scheme were to go ahead, is no more than a consultee. “... *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.*” Redetermination document 1.5 #1.2.6
2. NH does not propose to revisit its business case, review cost pressures due to delays in moving the scheme from RIS2 to RIS3.
3. NH does not explore costed alternatives to a scheme that has been rejected by the Planning Inspectorate for being “significantly adverse”.
4. NH has not considered testing low carbon traffic measures which could be implemented straightaway whilst improving access to the South West by rail.
4. NH has not re-evaluated the costs of the scheme in terms of increasing carbon valuations, contrary to the government’s policy to decarbonise transport and declaring a climate emergency.

## **Re-examination of the DCO**

In the light of the above the Secretary of State should either reject the scheme, or submit the Development Consent Order to an independent re-examination **before** making a final decision.

Regards,

Kate Freeman

**Interested Party No 20018942**

