

A303 Stonehenge Improvement Scheme – Response to redetermination

From Dr Suzanne Keene

Dr Suzanne Keene is Reader Emeritus in University College London where she researched and taught in heritage studies.

The Secretary of State's Statement of Matters emphasises that this redetermination is to be predicated on changes that have taken place since 12 November 2020 as well as on the judgement arising from the judicial review.

So much has changed in the economic and social environment since the scheme was first conceived, nothing less than a complete redetermination including a new public examination by the Inspectorate will suffice. In particular, concerns about climate change and the UK commitment to zero carbon; to the work environment resulting in fewer journeys; to the rise in energy costs that will result in fewer journeys should be taken seriously into account.

Alternatives to the current proposal

National Highways in their resubmission have simply not given sufficient detail of possible alternative routes to conclude that they have been adequately assessed.

Alternative measures more consistent with climate change and carbon emissions concerns should be investigated, such as speed restrictions and online information about periods of congestion (which are only a small percentage of the time) in preference to costly and environmentally destructive road building.

The current proposal takes the A303 away from the monument itself but instead exacerbates damage to the Stonehenge landscape. The [National Highways Response on Alternatives](#) to the redetermination does not significantly address the question of the damage.

The [judgement in the Judicial Review](#) notes that the WHS designation is significant in law and under the NPSNN (para 278); that the SST accepted that there would be significant damage under the proposed scheme (para 279); that the damage would be permanent and irreversible (para 280); that the western cutting in particular would be very damaging (para 281);

There would be multiple damages from the existing proposal, as the [Examining Authority's Report](#) found and as the Judicial Review agreed:

- to currently identified heritage features
- to the layout of the prehistoric features such as barrow cemeteries that have been shown to be deliberately laid out so as to create avenues and spaces

- to so far unidentified features that may be discovered in the future through using increasingly sensitive scientific analyses, 100% recovery excavation techniques and non destructive archaeological survey techniques that increasingly replace excavation

Furthermore, there would be damage especially at the western end to the setting of the WHS which is also protected in law:

- the views into it, where the tunnel cuttings will dominate the landscape notwithstanding 'green bridges', and out from it, especially at the boundary, where massive traffic interchanges will be visible.

As a signatory to the UNESCO World Heritage Convention the UK government has accepted that it has a responsibility to maintain the WHS status of sites. It is not only the Stonehenge monument itself that confers this status; it is the whole of the "landscape without parallel" anywhere in the world. This is why UNESCO has noted that if the A303 improvements are undertaken, with vast cuttings taking the road into the tunnel entrances, and visible interchanges at either end, the WHS status of Stonehenge may be lost.

This opinion is not confined to UNESCO. I have previously given evidence of the strength of public opinion against this "improvement", both in the UK and abroad, during National Highways' consultations, to the NSIP Enquiry and in the ongoing petition. The petition currently stands at 219,032 signatures – about two thirds from the UK and a third from overseas.

Referring to changes since the decision, the covid pandemic has brought about lasting changes to work patterns with many more people spending time working from home. This change may or may not lead to changes in the amount of traffic on the A303 but it has not been assessed.

Additional matter - value for money

This is an additional matter that should be taken into account in redetermining the application.

The resubmissions do not address the benefit/cost of the project. The [Economic Assessment, originally published in 2017](#) and [republished for the NSIP Enquiry](#), was fatally flawed, as [submissions to the Enquiry](#) evidenced. The actual economic benefit was at the time of the determination only 31p for every £1 spent. It was only boosted to a still minimal economic benefit by using [a contingent valuation exercise](#), using a [Stated Preference survey](#) that has been shown to have an erroneous basis. It showed participants the monument with and without the road, but not the cuttings, and then asked whether they would be willing to contribute to funding the scheme. Both the [National Audit Office](#) and the [Transport Select Committee](#) questioned the value for money. The contingent valuation exercise has been [publicly mocked by an expert in the field](#). Given the far reaching changes to the economy, to energy costs and to effects of these on transport requirements it is highly unlikely to say the least that the scheme would deliver the value for public money that is required. Yet the [DfT has stated](#), in the quoted responses to my Freedom of Information requests, that the

contingent valuation survey will not be updated if they re-run the BCR exercise. This is not good enough for an investment of around £2bn of public money at a time of stretched public finance.

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