

**From:** [REDACTED]  
**To:** [A303 Stonehenge](#)  
**Subject:** Comments on the Secretary of State's Statement of Matters 24 Feb 22  
**Date:** 02 April 2022 18:43:11

---

**2 April 2022**

**Proposed Recommendation** – that the Secretary of State invites the Applicant to develop the detail of the southern surface route (F010) as an alternative to the tunnel as options for consideration.

**Background** - Stonehenge in the west of the parish of Amesbury is unique. The Monument is the highlight of the landscape of the World Heritage Site. The A303 runs through that landscape. The fundamental issue is the clash between the ability to travel to and from the Southwest of England and the amenity of the areas the traffic moves through. The A303 past Stonehenge has been an issue for decades. There are many constituencies with divergent interests. Some are completely at odds with one other. Not all of these interests can be satisfied by any one option.

In the light of objections raised the tunnel appears to have been selected as the solution prematurely. The latest documentation from the Applicant seems to play down issues and risks with the tunnel and overstate problems with other options. The 301-page Technical Appraisal Report (TAR) remains in place.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010025/TR010025-000630-Highways%20England%20-%20Technical%20Appraisal%20Report%20-%20Volume%201.pdf>

The overall summary (22.1.7 page 285) noted that:

*“if the value of removing the A303 from the vicinity of Stonehenge is included in the assessment a positive economic case can be made for each of the options [D061, D062 and F010 – tunnel options and the Southern surface route].”*

TAR Page 209 Table 11-9 showed the Southern surface route could have the highest Benefit Cost Ratio BCR on 1.7 where the highest values for the tunnel options were 1.5 and 1.6. if greater relative weight is applied to the preservation of the WHS. The Applicant did not appear to explore this in the most recent documentation.

**Traffic** - The 301 page Technical Appraisal Report (TAR) remains in place. Page 176 Paragraph 10.3.5 notes that

*“As the Design Fix C model did not include detailed junction simulation , indicative junctions were represented in the link based modelling with all vehicle movements permitted at each junction.”*

The implication seems to be that in the modelled world it is easier to use the small roads than in the real one. The increase in rat running mentioned in assessment of F010 may be a modelling artefact. The real world has acceleration, deceleration and driver reaction times at junctions. The idea that more traffic would rat run through the villages rather than use the expressway invites further study.

In the real-world rat running happens when the A303 past Stonehenge becomes congested and drivers become frustrated. My videos at @A303Runner show instances of this happening from 2014 to 2020. The 2014 survey from Atkins confirmed this pattern of behaviour. The predicted increase in rat running is uncertain. I am not convinced by this argument against the Southern surface option.

David Jacques' comments reinforce concerns raised at earlier public discussions on the Tunnel options' effects on the archaeology at Blick Mead and the expected impacts of the flyover on the

amenity of the area of Amesbury. Blick Mead appears once, as “Blickmead”, in the TAR on page 265 18.3.52. This noted that

*“one of the construction methodologies may require dewatering of the chalk aquifer. Current assessment shows that a number of water environment features are within the potential area of influence of the scheme including local groundwater dependent biodiversity in the River Till and river Avon flood risk and cultural assets such as Blickmead Spring. De-risking work is being undertaken to fully evaluate the extent and magnitude of these construction effects and this may influence the assessment score.”*

I see this as an important uncertainty, a potentially massively adverse effect.

**Comparing Options** - The TAR overall summary (22.1.7 page 285) notes that

*“if the value of removing the A303 from the vicinity of Stonehenge is included in the assessment a positive economic case can be made for each of the options [D061, D062 and F010 – tunnel options and the Southern surface route].”*

TAR Page 209 Table 11-9 shows the Southern Surface route could have the highest Benefit Cost Ratio BCR on 1.7 where the highest values for the tunnel options were 1.5 and 1.6. Page 213 11.11.4 states:

*“The final judgement of value for money for the A303 Amesbury to Berwick Down must consider the impacts on the World Heritage Site and the wider non-monetised landscape and environmental impacts.”*

These impacts are not normally so important to appraisals, but they are vital to this decision.

**Conclusion** My priorities are the amenity of Amesbury’s residents, its history and its future. I believe that the tunnel’s infrastructure is likely to damage these. Recognising that the A303 in its present state is not good enough, I suggest that the Secretary of State invite the Applicant to develop detail of the Southern surface route (F010) as an alternative to the tunnel for consideration.

Ian Mitchell