

**From:** [REDACTED]  
**To:** [A303 Stonehenge](#)  
**Subject:** Comments on Stonehenge A303 Reconsideration  
**Date:** 04 April 2022 11:35:10

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Dear Sir/Madam

Further to the letter from the Department of Transport dated 24/2/2022 requesting comments from interested parties, I wish to **object** to the expenditure of an estimated £1.7 billion of public funding [1] on this hugely controversial scheme which runs counter to many of the current policy objectives of Government.

Considering some of the points which are deemed relevant to this reconsideration:

### **1) Consideration of Alternatives**

The applicant has failed to look at any alternatives other than building further road capacity. This does not take account of the changed emphasis emerging from consideration of the global impact of the Climate Emergency we are facing.

Alternatives which should have been considered include:

- Policies to encourage the use of rail and rail freight, including dualling and electrification of railway lines and potentially new stations
- A light rail or tram system to connect Amesbury to Salisbury and the expanding army bases in the area, to encourage alternatives to car usage
- National & local policies to encourage modal shift to public transport, shared mobility and active travel
- Road user pricing, which many have argued will be needed as we switch to vehicle electrification and the loss of fuel duty revenues anyway: this could be used to encourage the use of alternative routes, or alternative times of travel, on the A303.

### **2) Local and national policies**

The applicant relies on the 2014 document from the Dept for Transport “National Policy Statement for National Networks (NPSNN)”. This is misguided, given the important changes in policy emphasis which have occurred since then. Specifically the legally binding Paris Agreement was adopted at COP 21 in Dec 2015 and entered into force on 4 Nov 2016, its goal being to limit global warming to well below 2°C and preferably to 1.5°C.

The Applicant has stated that *“In July 2021, the Secretary of State announced a review of the NPSNN in light of the Government’s legal commitment to net zero, the 10-point plan for a green industrial revolution (HM Government, 2020), the new sixth carbon budget (Committee on Climate Change, 2020) and the Decarbonising Transport plan (DfT, 2021). The review is proposed to continue for completion no later than spring 2023. In the meantime, the NPSNN continues to have effect, therefore there is no change in the overarching policy context for highway NSIPs.”*[2]

It is shocking in the light of the environmental and ecological issues which are rising so fast up the agenda nationally and internationally that the Government should be taking 18 months to review a key policy document like the NPSNN. National Highways are relying on this Government inertia to delay reviewing the policy context for this, and other, road schemes in their RIS2 programme. In view of the nature of the Climate Emergency we are facing this is reprehensible.

### **3) Carbon impact**

The document relating to Bullet Point Three – Carbon – goes to some length to find quotes from National Highways ‘Net Zero Highways’ and HM Government ‘Net Zero Strategy: Build Back Better’ which imply that business can continue as usual and that decarbonisation can rely on moving the vehicle fleet to alternative fuels, primarily electrification. This confidence is not shared by independent assessors of the situation. The Climate Change Committee, an independent statutory body established under the Climate Change Act 2008, reported on the changes to policy which would be needed, particularly during the 2020s, to meet Net Zero targets. Their report indicated that, to meet the targets which were mandated, it was expected that 6% of baseline car demand could be avoided or switched to other modes by 2030, rising to 17% by 2050, and also that factors including improved logistics would mean that demand reductions for HGVs would increase gradually to 10% for rigid HGVs and 11% for articulated HGVs by 2030, remaining at these levels thereafter.[3]

Against this background it is unacceptable to allow a scheme which not only produces considerable greenhouse gases during the construction phase but which also produces more road user emissions in operation compared to the ‘Do Minimum’ option.[4]

### **4. Environmental Information**

The Environment Act 2021 is now in force and changes the context in which policy decisions should be made. There are five Environmental Principles in the Act (integration, prevention, rectification at source, polluter pays and precautionary). There is a need for all of these to be considered when the scheme is reconsidered, noting that this revised policy framework goes beyond protection and should support the restoration of Nature. [5]

### **5. Any Other Matters**

In 2021 UNESCO’s World Heritage Committee decided that in the event that the Development Consent Order was confirmed, that they would consider putting Stonehenge, Avebury and Associated Sites on the List of World Heritage in Danger.[6] To proceed with a scheme which would result in the loss of World Heritage Status would be contrary to the protection which is supposedly afforded to such sites in the NPPF and would be a shameful indictment of the true values of our policy and decision makers.

### **Conclusion**

The proposed scheme would make deep and highly damaging cuttings into the internationally acclaimed landscape of the World Heritage Site. It is also a scheme which is

increasingly out of line with current thinking on the need to protect the environment, to reduce human impact on the planet and to cut carbon emissions.

In January 2020 an independent panel of Inspectors from the Planning Inspectorate recommended that the Secretary of State should withhold consent for the scheme. Since then the policy direction nationally and internationally has been moving further away from policies which have an adverse impact on carbon emissions and which cause environmental damage. There needs to be a re-examination of the justification and wider alternatives to this scheme before an independent panel and this should inform any redetermination of the application for this Development Consent Order by the Secretary of State.

Yours faithfully

Margaret Willmot

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4/4/2022

[1] <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-002181-STON%20%E2%80%93%20Final%20Recommendation%20Report.pdf> para 8.11.35

[2] TR010025-002236-A303.SoM Response.BP2 Policy.Redetermination-1.2.Final 20220111.pdf, para 2.1.2

[3] [REDACTED] Surface Transport Report page 34

[4] A303 Amesbury to Berwick Down TR010025 APFP Regulation 5(2)(a) Planning Act 2008 Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 October 2018 6.1 Environmental Statement Chapter 14: Climate, para 14.9.5 and Table 14.15

[5] See for example <https://naturalengland.blog.gov.uk/2021/11/23/the-environment-act-2021-a-turning-point-for-nature/>

[6] See [REDACTED]  
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