



Stonehenge.A303@nationaltrust.org.uk

03 August 2022

**National
Trust**

Kevin O'Hanlon
Department for Transport
Great Minster House
33 Horseferry Road
London
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[via email to A303Stonehenge@planninginspectorate.gov.uk]

Dear Mr O'Hanlon

Application by National Highways for an Order granting Development Consent for the A303 Amesbury to Berwick Down (Stonehenge) scheme.

REQUEST FOR COMMENTS FROM ALL INTERESTED PARTIES

(['SoS letter'](#) of 13 July 2022)

We are writing in response to your letter dated 13 July 2022 seeking comments on National Highways (the "Applicant") response to your letter of 20 June 2022. The National Trust has reviewed the Applicant's submissions and welcomes the opportunity to comment.

The Applicant has provided further information on two alternative options. Both these options are derivatives of the scheme the Applicant seeks development consent for (the "DCO Scheme") and they follow the same route and core concepts, the key difference being the western tunnel portal location has been extended further west from its location in the DCO Scheme. The result in both scenarios is the tunnel would now extend beyond the western boundary of the World Heritage Site, reducing the amount of exposed road within it.

The Applicant describes a 'refinement' to its position on longer tunnel alternatives, having previously expressed the view, that any longer tunnel emerging outside the western boundary of the World Heritage Site, would need to be c. 4.8 km long and that this would necessitate the disbenefit of retaining the existing A360 and Longbarrow Roundabout in their existing locations. These options were therefore not considered by the Applicant to be a feasible solution. In contrast the Applicant has now provided outline information on

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potentially viable options, which both position the tunnel portal just beyond the World Heritage Site and reposition the A360 and Longbarrow Junctions (including removal of the current Longbarrow Roundabout) to a location which retains and increases the beneficial impacts to the World Heritage Site as proposed in the DCO Scheme.

The National Trust agrees with the Applicant's assessment that both these options would have an improved beneficial effect on the World Heritage Site (Outstanding Universal Value, Integrity and, in the case of the bored tunnel option, Authenticity). We note that the Environmental Appraisal, itself only a very high level of assessment, may be overstating new adverse effects, which with further development of these alternatives could potentially be avoided or reduced through design mitigation measures.

Based on the information presented in the Applicant's submission the mechanics of how the 'balanced appraisal' operates to arrive at its conclusion that: "*the additional cost of each alternative over and above the DCO Scheme would not deliver meaningful additional benefits to the WHS that would justify either alternative being taken forward.*", is not obvious. Further information on this, if available, would be welcomed, although we recognise that the difficult task of balancing planning issues, the overall public benefit of the scheme and the allocation of public funds is ultimately the responsibility of Government.

Although the alternatives contemplated here are not being promoted by the Applicant, were they deliverable, they would appear to address UNESCO recommendations. We therefore support any possible further investigation into these options, including the Government and the Applicant working with all parties to consider whether any element of these alternatives, of benefit to the World Heritage Site, could eventually be brought forward in the detailed design of the scheme, should consent be granted.

Yours sincerely

A black rectangular box redacting the signature of Nick Simms.

Nick Simms
Senior Project Manager

Cont/d