



Andrew C J Rhind-Tutt

3<sup>rd</sup> August 2022

National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Dear Examining Authority,

**TR010025 – 002292 Re-Determination of the Application by National Highways (formally Highways England) for an Order granting Development Consent for the A303 Amesbury to Berwick Down – Unique Reference 20020916**

Thank you for your request for further comment on National Highways response to the above. These follow, however, as National Highways have fundamentally ignored comments already made and chosen to repeat their previous views that are contestable, In addition to the following comments I also copy below my earlier comments that remain unanswered.

At Table on page 3 of their latest response, National Highways disingenuously respond to UNESCO’s valid concerns regarding the lack of alternative proposals by stating the following:

“National Highways has provided information on options assessment and the consideration of alternatives at various points in the development of the DCO Scheme, including the consideration of heritage benefits of alternatives. We have provided information on options and alternatives in public consultation material, DCO application documents, submissions to the examination of the DCO and in response to the SoS’s Statement of Matters, demonstrating the consideration of heritage benefits of alternatives at each of these stages of the DCO Scheme’s development.”

I contest that at no point were the public consulted at all on any alternative route solution that avoided a tunnel. The “public consultation” was fundamentally flawed and simply sought a view on a North or South route through Winterborne Stoke.

Further under Table 2, National Highways again disingenuously describe comprehensive analysis of alternative route options, yet my amended alternative route bypassing Stonehenge and Salisbury avoiding the Woodford Valley and the AONB of Cranborne Chase, was not analysed in any detail and the significant cost and time saving benefit for regional transport utilising the wider solution was completely ignored.

At Page 13, para 10, National Highways have ignored my property known as Bowles Hatches, which is not only blighted, at significant flood risk, but is also a rich archaeological site in its own right and will be affected should the scheme in its current state proceed.

I remain concerned that lighting of the tunnel portals and any lane changes within the WHS will harm the OUV and night sky and as a lighting engineer would urge careful consideration of this matter.

This statement is also of concern:

D-CH20: “There will be no external lighting on the cutting retaining walls, or the external facades of the tunnel control buildings and tunnel portals **within the WHS during routine operation** of the Scheme”

This does not preclude lighting at night time when there are lane closures for planned maintenance.

Please find below our response of 3<sup>rd</sup> August 2022 and the comments we made on 3<sup>rd</sup> April, regarding the above re-determination which remain valid and for which we also repeat and request a response.

Thank you for your letter of 13<sup>th</sup> July 2022 regarding the above and for providing the link to the Secretary of State’s (SOS) request for comments from all interested parties.

My response of 3<sup>rd</sup> April covered many important issues. None of these appear to have been addressed. I therefore resubmit below my comments 1-11 and request these are addressed as well as additional points 12-14 below these.

1. I am the owner of Bowles Hatches, which neighbours Amesbury Abbey, occupies 4.4 acres and is situated alongside the Avon and the A303 at SP4 7AP. The property, which includes land within the Stonehenge and Avebury World Heritage Site and sites of archaeological interest, will be significantly impacted and blighted by the proposed flyover and dual carriageway at Countess Road grade separated junction. To date I have had no contact regarding any proposals to address the environmental impact this Scheme will have on the heritage, biodiversity, amenity, privacy and the rare flora and fauna found at this site. Nor have I received any information on flood prevention schemes in the event of a catastrophic failure in any water management program specific to Bowles Hatches.
2. The Road Investment Strategy 2 2020-2025 states that an average of 34% of the traffic on Strategic Road Networks comprises of HGVs. Traffic flow records show that the largest proportion of HGV traffic on the A303 West bound at Stonehenge comes from Southampton docks via the A34. The route options to the West for this HGV traffic is either the A35, A36 or A34/A303. The A34/A303 is the furthest distance, yet it is chosen because the A35 is slow and the A36 gridlocks at Salisbury due to a lack of an adequate

bypass. The proposed scheme is Stonehenge World Heritage site specific and fails to take into account any regional issues that could be addressed at the same time.

3. The alternative route that I presented to the examining body in July 2019, was not considered fully with regards to its ability to reduce traffic movement of freight from Southampton and provide a cost effective solution to provide regional transport improvements, thereby satisfying RIS 2 and future regional needs for freight movement from the docks and across Wiltshire.
4. It is the principle of the alternative route that I put forward, not a detailed design showing the precise route the road would take. With careful consideration this alternative route could utilise existing byways and roads, enable the removal of unsightly power lines, avoid AONB sites and could address the points the applicant has used to eliminate the route without consultation.
5. I believe that due consideration should now be given to a wider solution that provides a significant reduction in HGV movement through the City of Salisbury and the Stonehenge and Avebury World Heritage Site.
6. The Applicant has failed to show any lifetime costings within this scheme. There appears to be no program to maintain the water table when the tunnel ceases to be in operation. This fundamental detail has been missing from the first proposals, places huge problems and cost implications for future generations to address and resolve.
7. The Applicant makes reference to the visual effect the proposed scheme will have on Bowles Hatches in the winter of year one, but disingenuously refers to the effect in the summer of year 15. I object to the applicant relying upon vegetation to remove the visibility of a 7m raised carriageway with vehicles in summer and to not mention the effect in winter after year 1. This scheme will blight Bowles Hatches and adequate mitigation has not been mentioned or discussed with me.
8. The Applicant makes reference to there being no additional street lighting at the Countess junction. However, there is already a scheme of high level lighting on the A303 at this junction, and there is no plan showing how the grade separated junction is to be lit safely without replacing some of the existing lighting.
9. The Applicant's current proposals continue to create a difficulty in access and egress at Longbarrow junction for users of the A360 and visitors to Stonehenge at any time the contraflow is in place in the proposed tunnel and a lane change is required west bound upon exit of the tunnel. Any estimated time savings predicted by the applicant through using the tunnel would be negated by lengthy diversions as and when this happens and cause further traffic issues in the local vicinity. The Applicant has not addressed this.
10. With unprecedented significant increases in labour, material and fuel costs, the applicant has not declared the revised construction estimates nor has he shown how the scheme will

be deemed value for money in accordance with the recorded figure by Keith Nicol of DCMS who stated on record that an increase in £100m would make the scheme unaffordable.

11. I request that this redetermination response is considered at a second examination should the matter proceed.

Additional points relating to National Highways Re-Determination Document reference 4.3 for which I would like the Secretary of State to take into consideration.

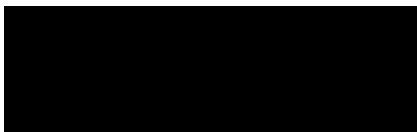
12. National Highways state on P.29 5.2.9 of re-determination document 4.3 that the proposed new Longbarrow junction will not be lit by street lighting and this will be mitigated by the use of traffic signals. This is disingenuous. I would like to request the details of the impact traffic signals will have on all traffic flows at the new Longbarrow junctions and how delays are to be mitigated to prevent further wider “rat running” in the community.
13. National Highways discusses on P.40 8.2.1 of re-determination document 4.3 that the OUV of the WHS is impacted by the existing A303. However a significant percentage of the visitors to Stonehenge WHS visit to see the Stone circle and not the landscape. The landscape is very clearly visible from the A303 which has provided a free breath-taking glimpse of a rich 5000 year old landscape to millions of passers-by for decades. Yet would no longer if the tunnel is built. I would like details of what percentage increase in visitors are expected to visit the landscape if the tunnel is built and due to the additional time needed for such a visit, what mitigation is proposed to handle longer opening hours and creation of additional parking within the site.
14. National Highways states on P.42 8.2.6 4.0 of re-determination document 4.3 that the lights of traffic along the present road adversely affect the ability to observe the midwinter sunset. This is misleading as the current position of the road prevents the lights from traffic to the west being visible at ground level on mid-winter sunset. I would like to see a photograph showing the light pollution as suggested or a redaction of the statement made.

There appear to be many assumptions and statements made within National Highways responses, that are not peer reviewed or lack detail due to time constraints.

I would like to request that the SOS gives adequate additional time for more detailed information to be provided by NH and for interested parties to be given adequate time to respond.

Further, I feel a re-examination is the only fair way of re-determining this proposal.

Yours sincerely,

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Andrew Rhind-Tutt