

**From:** [REDACTED]  
**To:** [A303 Stonehenge](#)  
**Cc:** [REDACTED]  
**Subject:** Re-determination of the Application by National Highways (formerly Highways England) for an Order granting Development Consent for the A303 Amesbury to Berwick Down. Unique Reference: 20019656  
**Date:** 26 September 2022 13:35:15

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**To:** For the attention of the A303 Stonehenge Case Team

I am responding as an Interested Party reg no **768184**.and would be grateful for confirmation you have received this.

I reiterate that I represent in my capacity as an Archdruid, the Female Druids United, the environmental voluntary network Sacred Grove Western Isles and the free access to Stonehenge campaigning group Open Access to Stonehenge and we continue to OBJECT to this Planning Application. There are no elements of this proposed development project, that I nor those I represent, can support.

The tunnel would bring permanent archaeological and conservational damage to the WHS and deny free and full public amenity both to the public and those who hold Stonehenge and its environs as a sacred temple and landscape.

On reading many of the responses to this application I note that many relate, as I do, to many questions that still do not have adequate clear and provable answers from the Applicant.

Particularly I fully agree with all the points raised by Stonehenge Alliance in this case and with Mr Andrew Rhind-Tutt's response recently on 3<sup>rd</sup> August 2022

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-003695-Andy%20Rhind-Tutt.pdf>

All the way through this process we all keep asking for proof of capability by the Applicant that they can either complete these works without predictable damage to the WHS or even whether it can possibly be viable, especially in the present economic climate. Of course there is the sword of Damocles' situation that every expert and organisation with specialist knowledge of this particular WHS knows - that there can be no surety of not creating subsequent grave and irreversible damage either during or after construction.

Again I have to reiterate my previous submissions that this Application is not fit for purpose, not value for money nor environmentally safe for the WHS and wider environment.

Please note:

– I have read the report of the Advisory Mission and agree with its principal finding, i.e. that the scheme would have an adverse impact on the OUV of the WHS and that a southern bypass should be further explored.

Why has the SOS ignored their own findings that a southern bypass would be better value for money, and yet asks for the Applicant to check and reverse what they have already refused to do, again another example of irrational and bizarre refusal to acknowledge the truth!

– The Mission admitted that at the very least the western limit of the tunnel should be extended to the WHS boundary. We know the Applicant baulks at extending in that a

longer tunnel involves fitting ventilation shafts thus increasing costs, regardless of the dangers all tunnels present to motorists especially those who are involved in accidents or become ill inside one unaware of the strategies to get out even on foot!

– National Highways has simply reiterated many of the arguments it has raised previously to justify a scheme which is clearly unacceptable to:

Government's independent specialist examiners,  
- UNESCO's World Heritage Committee, and  
the former Transport Secretary himself who agreed with the examining panel that the scheme would be "significantly adverse" overall.

– The High Court judgment quashed the DCO in part because the Transport Secretary had not given proper consideration to alternatives. Being unlawful and irrational seems to be a significant thread throughout this process!

– National Highways' response fails to alleviate any of the above concerns. There are still inadequate summaries and abstracts to weighty tomes of confusing documents, some of which are over a THOUSAND pages each, and the time given for the general public to deal with and submit adequately was insultingly short.

– I continue to Object to the proposals and reiterate all my previous submissions in this highly protracted Application and trust that the opinions of the learned Judge, the warnings of the Examining Panel and the expertise of UNESCO ICOMOS and all the other objecting professionals will be upheld and that the scheme will be abandoned.

– Should the Transport Secretary intend to proceed with the scheme, I strongly request that it will be subjected to another formal public Consultation and Planning Inspectorate Examination so that all of the new information submitted by National Highways and others since 2020 may be fully and openly discussed, and taken into account and advised upon by the Government's independent Planning Inspectorate.

### **Official Complaint on the conduct of this Application**

The timings and poor presentation of these very unclear evidence bundles sent out after the Quashed Decision and Approved Judgment by The Hon Mr Justice Holgate 30/07/21, <https://1f2ca7mxjow42e65q49871m1-wpengine.netdna-ssl.com/wp-content/uploads/2021/07/Save-Stonehenge-judgment-FINAL-CO-4844-2020-30-07-2021.pdf> over and over again for months to the public, should be a cause for investigation and auditing. The amount of evidence is commensurate with what the original Examining Panel were assisting the public with via the Inquiries in Public.

It cannot rationally be in the public interest to keep sending out bundles of thousands of pages with a response time of less than three months! Sometimes less than a month, so how are the general public able to read, compare, study, discuss and research and then compose adequate arguments within a couple of weeks?

This process is blatantly setting up many respondents including those of us that took the time and effort to attend many of the Hearings in the Inquiry in Public process, to simply fail.

Even someone like myself well used to contracts, research and responding to legal arguments have needed more time to adequately discuss with the many others I represent: obviously it takes time, the same time as was given in the first round of Consultation.

During the Inquiry in Public process we had the leadership and helpful explanation by the Examining Panel and throughout the Hearings we were able to coherently answer each section under the guidance of knowing what was required. The guidance and helpful expertise of the Examining Panel has been required ever since the Quashing Order!

At least four separate demands of confusing questions from the Secretary of State have gone out and then there is a gamut of further replies from the Applicant and we the consultees are blithely asked in a couple of weeks to do what the SOS failed to do in months!

I noted, as did others, that in the first few replies by the Applicant to SOS subsequent queries there were no proof of evidence, no links for us to check and no understanding by those unqualified as to how these statements had been arrived at, even the SOS was demanding proof like a headteacher checking for plagiarism.

Each document presented for public consultation demanded clarity and proof and a strategy not just a policy, in fact the Application read more like a wish list than a cogent plan.

Each document for public assessment should have contained a clear Abstract and a Summary and a link to every reference and technical data relied upon. They have not and still remain unclear to the unprofessional respondent.

In fact, we can look back on this year of countless additional evidence pages submitted by the Applicant and safely say if this was a 'public' consultation that is entirely fatuous and disingenuous and to quote the Quashing Order and Approved Judgment by The Hon Mr Justice Holgate 30/07/21, <https://1f2ca7mxjow42e65q49871m1-wpengine.netdna-ssl.com/wp-content/uploads/2021/07/Save-Stonehenge-judgment-FINAL-CO-4844-2020-30-07-2021.pdf> is still irrational and requires auditing as to the incompetence shown by the Applicant by the number of clarifications the SOS has demanded subsequently.

The loss of full public amenity in the WHS could be a serious consequence of unqualified members of the public desperately trying to engage and as many have told me, just giving up in despair and confusion or being timed out!

We require another full consultation with either a new Examining Panel or use the excellent experiences of the last one but this Application and the onerous and inequitable process of this consultation, resulting in a Judicial Review and a quashing of the Decision by The Hon Mr Justice Holgate 30/07/21, that then resulted in almost monthly additional consultation bundles being slipped in which together almost amount to the quantity of the original Application!

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### **Auditing Request**

Please refer my Complaint on this management of this Application to the Department for Levelling Up, Housing and Communities or whichever department is responsible for auditing both the SOS department and Planning Inspectorate. I will be forwarding this request to my MP Mr Johnny Mercer Conservative Parliamentary Member for Plymouth Moor View.

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Lois Lloyd BSc(Hons)

