

## **A303 Stonehenge (Amesbury to Berwick Down) Consultation – response from Campaign for Better Transport**

### **Contents:**

1.1 Introduction .....	2
1.2 Need to run a fresh consultation .....	2
1.3 Minor tweaks that do not address the major impacts.....	2
1.4 The damage in the east .....	3
1.5 The case for a new or expanded road has not been made.....	3
1.6 Cumulative impacts not addressed .....	3
1.7 Are these really green bridges? .....	4
1.8 Environmental impacts not fully captured.....	4
1.9 Vulnerable road users need good connections and quality infrastructure .....	4
1.10 Conclusion .....	4

# 1. Campaign for Better Transport's Response

## 1.1 Introduction

Campaign for Better Transport object in principle to these plans which will cause further damage to the Stonehenge World Heritage Site. Our response echoes the detailed objection made by the Stonehenge Alliance of which we are members: we are submitting these comments in addition to that response.

## 1.2 Need to run a fresh consultation

We are disappointed that despite UNESCO's concerns about the scheme proposals and our previous objection and calls for the consultation process to be rerun, that Highways England (HE) has carried on regardless. It has made some relatively minor changes to the scheme design which do not address the very substantial concerns that many people have with its proposals. We are also concerned that the great many objections to the scheme appear to have been ignored.

Nothing has changed to alter our belief that there needs to be a fresh consultation with a full and proper set of options and for a longer period of time. The current process should be halted and Highways England should fully address the concerns of UNESCO and ICOMOS.

## 1.3 Minor tweaks that do not address the major impacts

Highways England has made a number of relatively minor tweaks to its proposals including:

- Realigning the road so that its western entrance would not intrude on the winter solstice when viewed from Stonehenge
- Providing options for a small 100 metre extension of the tunnel at the western end using cut and cover techniques which may be open or closed in design
- Sinking the road on the western end in a deep cutting
- A new junction with the A360 outside the WHS

However, it has still not addressed the fundamental issue that a 2.9km tunnel for a road traversing a 5.4km wide World Heritage Site (WHS) is clearly not long enough to avoid causing substantial damage to the landscape and archaeology there. It will result in around 1km of new surface dual carriageway within the WHS on its western side (even if sunk below ground level) and much of the road east of the tunnel is also new surface dual carriageway. This represents a substantial footprint and intrusion on this much valued and important heritage landscape and is therefore likely to cause significant damage.

Realigning the road will obviously reduce the impact on the winter solstice, but if the tunnel was of sufficient length so as to avoid impacting the WHS altogether, then this is unlikely to have been an issue anyway. The same applies to the small cut and cover extension and sinking the road in a cutting at its western end. While both of these latter measures obviously reduce the visual impact of the new road on the WHS landscape, they will cause significant and lasting impact on the archaeology, while still severing the landscape physically.

It also seems rather perverse that HE is offering more damaging solutions in this public consultation, such as the grass sloped cutting on the western section, rather than vertical retaining

walls. The grass sloped cuttings would have an even greater impact on archaeology as well as displacing more soil which will need to be disposed of off the site. Does this mean Highways England will stick with its slightly less highly damaging proposals (of vertical retaining walls) or go with what could be a more popular but even more damaging solution? Or does it ignore the consultation results and stick with what it was proposing anyway? Either way, these don't seem to be giving the public much option or choice, particularly when the majority in the last consultation opted for something that would avoid this damage in the first place but have been ignored.

At Longbarrow, while moving the junction away from the WHS is welcome in principle, it still has a great impact on the setting of the WHS and archaeology associated with it, which a longer tunnel and better design could avoid.

It therefore remains difficult to see how HE's proposals conform to the National Networks National Policy Statement policies on the protection of a WHS and the great weight that needs to be applied to those policies. It places the UK Government in a compromised position given its international undertakings to UNESCO to safeguard the archaeology and landscape of Stonehenge WHS.

#### **1.4 The damage in the east**

The impact of the proposals on the eastern section of the WHS have been significantly downplayed. While the proposals avoid direct impact on the Avenue, the road is so close that it will impact on its setting and the whole feel of the landscape. In addition, the road will be on a new alignment and be outside of the existing highway boundary for much of its length. The flyover across Countess roundabout will also have a far greater impact on the landscape and increase noise pollution within the WHS due to its greater elevation and the higher volumes of traffic.

It also risks having a significant impact on Blick Mead and we are not convinced that the fragility of this important archaeological resource is fully appreciated and how it could be destroyed by these works.

#### **1.5 The case for a new or expanded road has not been made**

As we stated previously: while it is accepted that there are times when the road does become congested causing delays and rat-running, this is no worse and probably a lot better than the congestion suffered by many other areas, particularly urban areas, every day. Indeed, the main congestion is around the weekends and a few weeks in the summer. The transport modelling that has been used to build the case for expanding the A303 is not fit for purpose and cannot be used to justify the proposed scheme.

We believe that strategic East-West journeys are best made on the existing motorway network, and that local journeys would be better served by a more multi-modal solution that does not impact on the WHS. Better use of travel planning information could help address predictable times of heavy traffic in a more cost effective and sustainable way than this very expensive road scheme.

#### **1.6 Cumulative impacts not addressed**

Again, as we stated previously: we are concerned that this scheme is being progressed at the same time as, but otherwise in isolation to, the other schemes being proposed along the A303/A30/A358 corridor. This will mean that the full impact of these schemes is likely to be severely underreported. If all these sections are expanded to dual carriageway standard, alongside

junction capacity increases, this is likely to result in a big increase in traffic along this corridor, both induced and reassigned from other routes, over and above what is estimated for each scheme in isolation.

This in itself will have a negative impact on the WHS as it will likely result in a large increase in traffic through the WHS. Given that nearly half of the road through the WHS is at surface level (even if the western section of it is sunk within the landscape), this will have a significant impact on air and noise pollution within the WHS and cause significant harm. Noise pollution will also increase as a result of the higher traffic speeds, particularly at the western end.

Linked to the likely large increase in traffic along this corridor, it is most probable that carbon emissions will increase significantly. This will further undermine the ability of the Department for Transport to reduce carbon emissions from transport. Given that transport emissions have been flagged as being of concern by the Committee on Climate Change in its Progress Report to Parliament in June 2016, Highways England cannot keep ignoring the fact that its road building programme is driving up emissions.

None of these issues or concerns have formed part of this or any other consultation on the A303 and the Stonehenge WHS.

### **1.7 Are these really green bridges?**

The proposals include what have been described as four green bridges, yet this title to some extent appears to have been misappropriated. It is not clear what function these bridges provide other than a physical connection for people. On a basic level they may provide some connectivity for wildlife too, but their significance, if there is any for biodiversity, is not explained. Without this explanation and reasoning it is premature to be calling these structures green bridges and to do so risks undermining the definition of what a green bridge actually is.

Indeed, green bridge number three, appears to have no 'green' function at all, as it is simply a bridge that is part of the Longbarrow junction which does not connect any landscapes or habitats.

### **1.8 Environmental impacts not fully captured**

We are concerned that the Environmental Impact Assessment (EIA) carried out to date does not appear to be comprehensive or thorough. It does not include the substantial, permanent damage that will happen to the archaeology and landscape of the WHS. While there may well be localised benefits to the WHS, it is not enough for the EIA to focus on these and exclude wider negative impacts such as the flyover entering the WHS from the east, the extra noise and air pollution that will result due to increased traffic levels and speeds within the WHS, the rise in carbon emissions, etc.

### **1.9 Vulnerable road users need good connections and quality infrastructure**

If the road goes ahead either as it is, or in modified form, it is important that pedestrian and cycle facilities along and across the route are improved. New cycle facilities, for example, will need to be designed to the latest standards as laid out in Interim Advice Note: 195/16 and sealed surfaces of adequate width should be provided to ensure all cyclists can use them. This is particularly important when considering what happens to the existing A303 when it is downgraded to a 'green' byway. It should not lose its tarmac surface even if the full width of the A303 is not needed and the

width of tarmac is reduced. Otherwise it risks undermining the usage of the byway, particularly by cyclists. A smooth sealed surface is important for maximising accessibility and this is also true of connecting byways and cycle routes. Just providing a rough track is not good enough.

In addition, consideration will need to be given to improving links into the wider area. It would be no good enhancing the infrastructure within the WHS if pedestrians and cyclists cannot easily and safely access it from all directions, particularly where they have to cross or travel along busy roads.

### **1.10 Conclusion**

Overall, we are deeply concerned with these proposals and HE's refusal to acknowledge the significant and permanent destruction that will take place within the WHS and its setting. The concerns of UNESCO / ICOMOS have not been adequately addressed and that is deeply worrying and potentially places the WHS designation in jeopardy.

We remain convinced that there needs to be a fresh consultation process to provide the public with a genuine range of options that cause no further harm to the WHS.

We would like to see a much more strategic approach being taken to tackle transport issues along this corridor, rather than relying almost solely on road building, which is unlikely to do anything other than increase traffic and congestion in the longer term.

**23 April 2018**

Chris Todd  
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

16 Waterside, 44-48 Wharf Road, London N1 7UX  
Registered Charity 1101929. Company limited by guarantee, registered in England and Wales: 4943428