

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

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# **1. Campaign for Better Transport's Response**

## **1.1 Introduction**

Campaign for Better Transport objects in principle to the plans to build a new dual carriageway through the Stonehenge World Heritage Site (WHS) because of the damage it will do to the natural environment and archaeology and the site's Outstanding Universal Value. Nothing contained in this supplementary consultation changes our position and we have concerns about some of the changes being proposed which are outlined below.

## **1.2 Minor tweaks do not address major concerns raised in last consultation and by UNESCO**

Highways England (HE) has made some relatively minor changes to the scheme design for this consultation, supposedly to address comments made during the last consultation, but has overwhelmingly ignored the very substantial concerns raised by the vast majority of respondents.

HE has also done relatively little to address UNESCO's criticism of the scheme proposals as raised at the World Heritage Committee less than a fortnight before the start of this consultation. In fact, the running of this supplementary consultation seems premature if more substantial changes are going to be required to satisfy UNESCO.

## **1.3 Need to run a fresh consultation**

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 before partaking of any further rounds of consultation or submitting a draft Development Consent Order (DCO).

## **1.4 Removing the previously proposed link between Byways 11 and 12**

We support the withdrawal of this proposal which would have harmed the WHS and is unnecessary. However, measures will need to be put in place to ensure that motor vehicles cannot access the restricted byway along the A303 without inconveniencing non-motorised users (NMUs).

## **1.5 Green bridge near the existing Longbarrow roundabout**

We object strongly to this proposal. Aside from the need for the new road to be in a tunnel at this location, the moving of the green bridge eastwards takes it away from the Longbarrow which is left overlooking a deep cutting with its associated road noise. If a green bridge is being kept then it should be on the line of the existing A360 so that it protects the setting of the Longbarrow and users of the new bridleway are not sent on an unnecessary 400 metre diversion.

The 400m diversion would also result in an additional 400m of restricted byway being constructed within the WHS, which could potentially cause further harm to the landscape and archaeology. Our preference is to retain the direct line of the original proposal which would have seen the restricted byway created on the A360 outside the WHS boundary and with no impact on the WHS.

## **1.6 Rollestone crossroads**

We strongly object to these proposals which see another damaging and unnecessary incursion into the WHS. There is no need for such an over-engineered solution in this location for a road which is relatively lightly trafficked in any case. The junction should either be left as it is or if some improvements are required to allow use by longer vehicles then it could be widened or a small roundabout installed with strips for longer vehicles to overrun. This would ease the geometry of the current junction while minimising any land take and impact on both the WHS and on agricultural land.

## **1.7 Other Rights of Way Concerns**

It is important that new infrastructure such as the new restricted byway along the A360 and A303 and the new bridleway link to Winterbourne Stoke are built to IAN 195/16 standards with sealed surfaces so that they are accessible by all. If these are built (or ideally part of the old road surface is left intact) with good connections to other destinations, then these could form an important network for NMUs. However, the full potential of these new or amended rights of way will not be realised if connections, or the routes themselves, are poorly designed and built with unnecessary diversions.

We would question, for example, why the new bridleway link into Winterbourne Stoke has to cross the road twice by being placed on the northern side of the road, when if placed on the southern side, it would only involve crossing the road once.

It is also disappointing to see that the opportunity to build a proper and safe connection across the A303 on the Amesbury Road (connecting Amesbury and Bulford Camp) has not been taken and instead this road, along with Allington Track, are to be stopped up. That might be desirable for road traffic but the lack of consideration for NMUs, regardless of the current situation for them here, is a missed opportunity.

## **1.8 Conclusion**

Overall, we are deeply concerned that HE has not addressed the fundamental concerns raised by the majority of respondents to the last consultation or by UNESCO. Given that UNESCO has only recently fed back, it does seem rather odd that HE has gone ahead with this consultation and didn't take the time to review and address UNESCO's substantive concerns.

With regards to the minor issues being consulted upon here, aside from the proposal not to link byways 11 and 12 for motor vehicles which we support, the rest of the proposals are unnecessarily harmful and will waste resource. They are over-engineered and have a needless footprint within the WHS. It is also clear that little consideration has been given to NMUs in the moving of the Longbarrow green bridge which would create a 400m diversion for no wider benefit.

Overall, this is a disappointing consultation in that it has failed to address substantive and serious concerns, leaving the impression that HE is tinkering at the edges of the scheme while refusing to acknowledge its more fundamental problems.

**14 August 2018**

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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.

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