

## **A303 Stonehenge - the proposed option**

### **Response on behalf of SW Friends of the Earth**

#### **1. To what extent do you agree with our proposed option?**

Strongly disagree.

1) It is very disappointing that no solution has been presented for consultation that avoids damaging the Stonehenge World Heritage Site altogether. Not doing so disrespects the Outstanding Universal Value of our most iconic World Heritage Site, an archaeological treasure store without parallel in Europe. Instead the approach taken by Highways England is narrowly focused on the Henge Monument and visitor experience.

The WHS setting would be impacted on as well which is likely to have other archaeological treasure. For example the archaeological dig at Larkhill for new MOD housing has revealed remarkable finds and the dig at Blick Mead might extend into areas impacted by the road scheme and junctions.

2) The approximately 2km of new dual carriageways either side of the tunnel portals leading to grade separated junctions introduces major highways engineering into a landscape of special status which will draw in new traffic and noise to an otherwise tranquil areas.

3) There is a serious risk of permanent damage caused by the Winterbourne Stoke bypass options which would cross a Special Area of Conservation and the western flank of the scheme on a Special Protection Area (Normanton Down vicinity). There is no robust Appropriate Assessment to facilitate proper comment, however we are aware that the Stone Curlew, an Annex 1 species which has been successfully nesting in the RSPB reserve is susceptible to human disturbance. There will undoubtedly be disturbance both from constant traffic noise and new roaming visitor patterns that English Heritage plan to introduce.

4) The traffic case for widening the single carriageway to an expressway is unconvincing. Despite the stopping up of the A344, the AADT has remained similar since 2000 at around 23,000-24,000. Whilst there are times when congestion is a cause for considerable concern to local communities and motorists these are at predictable times and could be imaginatively managed.

You maintain in Executive Summary p1 that the traffic operates at "almost twice its capacity". This is factually incorrect. This is derived from DMRB Vol 5 Section 1 Part 3 (TA 46/97 which sets the upper threshold of the economic flow range for an ordinary single carriageway at 13,000 AADT. It is an estimate of the traffic flow range at which a road will operate with greatest efficiency. This is not the same as capacity, which is best expressed as the Congestion Reference Flow of around 22,000 - 23,000 AADT which the TAR refers to later (see TA 46/97 Annex D) which is much the same as at present. Both the single two-way carriageway and a Wide Single Carriageway which has a CRF of 32,000-33,000 should have been considered as an affordable alternative option for a longer tunnel.

5) The TAR assessment fails to appraise the traffic increase from a wider area reassignment on the model. The comparable proposal for dualling the A30 at Bodmin-Indian Queens experienced a 20% increase in traffic volumes three years after opening. The A303 has the

potential for much greater reassignment in Wiltshire between London and Exeter, in much the same way that congestion increased following the opening of the dual carriageway through the Hindhead Tunnel in 2011 on a strategic route from London to Portsmouth. Any incident on the new dual carriageway would force A303 traffic to reassign routes through villages if the existing A303 is not retained.

6) We believe that the scheme represents poor value for money and fails to achieve its objectives.

**2. To what extent do you agree with our proposed location of the eastern portal?**

See our reply to Q1.

**3. To what extent do you agree with our proposed location of the western portal?**

See our reply to Q1.

It is premature to comment since we understand that the Western portal and new approach road are subject to further archaeological and geological survey.

**4. Of the two possible routes for the Winterbourne Stoke bypass which do you consider is the best route?**

1) In order to comment we need to see

(a) a robust Appropriate Assessment for the impact on the River Till and nearby habitats

(b) a hydro-geological assessment on the whole route

2) We agree that the village needs relief from incessant traffic but we are unconvinced that a bypass to the south would not disturb more people in Berwick St James and a bypass to the north would not continue to disturb the people in Winterbourne Stoke. The noise and traffic fumes of high speed traffic would be considerable.

**5. What are the most important issues for you as we develop our proposals for the A303/A345 Countess junction?**

The proposal for a grade separated junction is inappropriate. It cannot be ignored that this major infrastructure would have a major landscape impact on the setting of the World Heritage Site and damage its integrity. The primary objective should be the protection of the whole WHS and its setting for all time. More imaginative and effective solutions need to be found in partnership with those who are exploring Blick Mead and those who implement the WHS Management Plan.

**6. What are the most important issues for you as we develop our proposals for the A303/A360 Longbarrow junction?**

Our comments are similar to Q5. We need to add that the vagueness of the north south routes to Salisbury and Devizes means that this consultation is too premature for public consultation.

**7. Do you have any other comments?**

Despite Government's commitment to the UNESCO World Heritage Convention it is evident that the Client's instruction (i.e. Department for Transport) is to build a solution acceptable to Government's predetermined aspiration to build a tunnel of 'at least 2.9km' for a dual carriageway across the 5.4km WHS within its budget of £1.4bn regardless of other possible options and other means of spending that budget more fruitfully.

We participated as stakeholders in one the transport and access workshops on 18 September 2016 imagining that the issues discussed would lead to a series of options which had proper regard to local traffic management, respected the full width of the WHS and its setting, as well as options for local and strategic access by no-car modes in line with the interests of the stakeholders present.

In conclusion, the proposals are too vague, the information provided is geared towards a predetermined outcome and therefore do not offer the local, national and international communities sound options worthy of our WHS.

This consultation process is contrary to the principles of public participation and contrary to the Aarhus Convention, a protocol to empower people with the rights to easily access information and participate effectively in decision-making in environmental matters.

We would like to see the consultation re-run with options that fully protect the WHS.

### **Feedback on this consultation**

See comments in Q8