MP's letter will seriously mislead Transport Secretary



Salisbury MP, John Glen MP and Wiltshire Council's Cabinet Member for Transport Cllr Dr Mark McClelland [Note 1] recently wrote to the new Transport Secretary, Anne-Marie Trevelyan (see below). They raised UNESCO's Advisory Mission's report on the proposed A303 Stonehenge road project and asked the Minister to support National Highways' scheme, arguing incorrectly that it would result in:

> "*sensitively mitigating risks*" to the World Heritage Site (WHS)
>
> "*the very best solution for reducing journey times*", and
>
> "*removing the ugly scar of the current surface road*"

The letter seriously misunderstands the High Court judgment, the Examiners' conclusions, the former Transport Secretary's views of the scheme and UNESCO's position. [NOTE 2] We address the three assertions:

"*mitigating risks*" to the World Heritage Site

The High Court judgment quashed the DCO in part because the Transport Secretary, recognizing the **damaging impacts of the scheme**, had not given proper consideration to alternatives.

A principal finding of the Advisory Mission is that the scheme would have an **adverse impact on the WHS**. They advise that a southern bypass should be further explored, but **at the very least** the tunnel should be extended to the western WHS

boundary. They also expressed concerns about the potential impact on the Mesolithic Site of Blick Mead.

The World Heritage Committee last year warned that without scheme amendment, it would consider placing the WHS on its list of **World Heritage in Danger**.

"the very best solution for reducing journey times"

At a scheme cost of at least £2.5bn, the time savings from London to the South West along the A303/A358 corridor would be in the order of eight minutes overall. This calculation depends on the completion of all eight A303 schemes proposed by the Department for Transport. Yet only three of those schemes have been funded to date. Implementation of the Stonehenge tunnel scheme would simply shunt congestion further down the road.

National Highways' response fails to address the critical economic point made by the National Audit Office in 2019 that "the benefits of the Stonehenge section will not be realised until all eight schemes have been completed."

The "*significant advantages*" for local communities at peak times do not require or warrant a damaging tunnel scheme. No one is objecting to a bypass for Winterbourne Stoke, and Wiltshire Council should be strongly managing traffic through the local villages of Shrewton and Larkhill in any case. Such schemes could have been implemented many years ago. A local resident wrote to us recently "*we do not have the right to destroy the land and its artefacts when we could easily divert traffic in much more compassionate ways.*"

"removing the ugly scar of the present road"

The scar of the present road would remain in the landscape, in part as a byway. In addition there would be about 2km of open dual carriageway within the WHS plus tunnel portals. Just outside, affecting the setting the WHS, ugly new junctions

would scar the landscape and damage archaeology. The independent specialist Examiners pointed out that "*the current proposal for a cutting would introduce a greater physical change to the Stonehenge landscape than has occurred in its 6,000 years as a place of widely acknowledged human significance. Moreover, the change would be permanent and irreversible*."

Furthermore, they said that the scheme "*would give the* [western] *cutting greater visibility to users of the byway, with the likelihood of views directly into the cutting and into the entrance to the tunnel.*" The former Transport Secretary accepted that the impacts on the WHS would be significantly adverse.

We conclude that…

On these grounds alone the scheme should be abandoned. Should the Transport Secretary wish to proceed, the scheme should be thoroughly reviewed and subject of another formal public Examination so that all of the new information submitted by National Highways and others since 2020 can be properly scrutinised.

NOTE 1: Dr Mark McClelland works part time for John Glen Mp and is Wiltshire Council's Cabinet member for Transport

NOTE 2: Reference: Planning Inspectorate links to project overview

JOHN GLEN M.P.

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Reference: JG/MM/Cons/AMT090922

The Rt Hon Anne-Marie Trevelyan MP
Secretary of State for Transport
Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

23 September 2022

Dear Anne-Marie,

Many congratulations on your recent appointment as Secretary of State for Transport. We are writing to reiterate our continued support for National Highways' A303 Stonehenge Tunnel scheme and request that the project remains an important priority for the government during your tenure.

As you will know, the initial Development Consent Order (DCO) for the Amesbury to Berwick Down A303 scheme was quashed by the High Court in July 2021. This resulted in your predecessor requesting new information regarding the scheme's environmental and heritage impact, the merits of a longer tunnel, and the consistency of the project with national policies.

National Highways replied to this request at the start of this year, providing a response to the Statement of Matters, and confirming their continued support for the broad parameters of the proposed scheme. Following the World Heritage Centre/ICOMOS/ICCROM Advisory Mission to Stonehenge earlier this year, further responses from Interested Parties are being received before the DCO will return to your office to be redetermined.

We remain firmly of the view that the scheme proposed remains the very best solution for reducing journey times to the South West from London, while sensitively mitigating risks to the local environment and unique heritage of the World Heritage Site. The use of a tunnel

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will reunite the ancient landscape, removing the ugly scar of the current surface road which blights the status quo.

In addition to the broader strategic benefits of reducing journey times on a key strategic route, the proposed scheme will have significant advantages for villages in the vicinity of the current road including Winterbourne Stoke and Shrewton. Congestion on the A303 as well as rat-running in nearby villages undermine the quality of life of local residents through increased journey times, traffic and air pollution. The tunnel scheme would allow these issues to be tackled once and for all and provide a solution which has eluded policymakers for many decades.

We trust that the scheme will continue to enjoy the full support of the government and look forward to the formal approval in due course. The benefits of the project for residents in South Wiltshire as well as the entire South West region cannot be underestimated.

John P. Glen

John Glen MP
Member of Parliament for Salisbury

Cllr Dr Mark McClelland
Cabinet Member for Transport
Wiltshire Council

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Short tunnel is no short cut. Back to the drawing board?



Submissions on the latest consultation prior to redetermination of the A303 Stonehenge road scheme have now been **published**. The consultation gave the Department for

Digital, Culture, Media and Sport (DCMS) the opportunity to publish the **report** by UNESCO's Joint Advisory Mission (World Heritage Centre, ICOMOS and ICCROM) following their visit to Stonehenge last April.

National Highways (NH) provided new information on cut and cover and bored tunnel extensions, as well as other matters requested by the Transport Secretary.

The Stonehenge Alliance response is contained in three separate documents by topic area:

- **Review of environmental information including cultural heritage, tunnel extension and other planning issues**
- **Transport issues, alternative options and business case**
- **Geology, soils, vibration and adverse impacts of tunnelling through chalk**

Key points and responses to note:

Alternative route

- The Alliance questioned why the tunnel extensions should terminate only 80m beyond the western WHS boundary whilst repositioning the A303/A360 interchange further west and **out of sight from the WHS.**
- The **Advisory Mission** said that ideally the road should be taken **outside the WHS**, but stated that any tunnel should extend at least to the western WHS boundary. However **no decision should be taken on the scheme before the next World Heritage Committee meeting.**
- The **Council for British Archaeology**, **ICOMOS-UK** as well as the Alliance asked for further investigation of a southern WHS bypass. It would be both **beneficial to the WHS and less expensive.**

- The **National Trust** and **Wiltshire Council** saw benefits in longer tunnel alternatives, should they be considered both acceptable and viable, whereas the **Consortium of Stonehenge Experts** did not recommend the cut and cover extension as "*it would involve significant loss of the physical fabric of the WHS*".

Carbon

- At a time when Government **decarbonisation policy is to facilitate a reduction, or at least a stabilisation, in traffic,** the Alliance repeated arguments for consideration of **non-road building alternatives**, including effective traffic management measures.
- The scheme would generate massive carbon emissions in construction and operation, and is entirely out of step with advice by the **Climate Change Committee which warns that reduction in car use is essential to tackle the climate emergency.**

Geology, soils and hydrology

- We once again expressed grave concerns about the **problems that would arise from tunnelling through the unique chalk geology of the WHS** which lacked specialist assessment
- The **Environment Agency** concluded, on the extended tunnel alternatives, that there is "*insufficient evidence to support the Environmental Appraisals*" especially in relation to "*potential impact on groundwater and flood risk matters*."

Business case

- The Alliance challenged National Highways' revised business case which **improved the case for the scheme** despite its reliance on a discredited heritage valuation

survey without which the scheme would show negative value for money spent on it.
- Furthermore, the scheme is being **progressed in isolation from other identified bottlenecks along the A303 corridor**, undermining the time savings and benefits attributed to it.

Future options

- Any substantial change to the design of the original DCO **would require a fresh application**.
- The Stonehenge Alliance continues to argue that the proposed project is so flawed, and its negative impacts so great, that the **Secretary of State should refuse the Development Consent Order.**
- If, as National Highways proposes, the Transport Secretary is minded to **proceed with the present scheme unchanged, it should be formally re-examined, so that all the new information made available since 2019 may be properly considered and the Transport Secretary receive independent specialist advice.**

New consultation deadline

- DCMS **restated** its commitment to NH's scheme but sought to address the Advisory Mission's recommendations "*to the fullest extent that is reasonably practicable*". Accordingly the Transport Secretary has now issued a **letter inviting the Applicant** to provide comments on the **Advisory Mission's report** by **9 September 2022**.
- Interested Parties will once again be invited to comment on the Applicant's response, this time in the context of new Government leadership.

OTHER LINKS

- Amesbury Museum and Heritage Trust response
- Avebury Society response
- National Highways: Sequence of 9 documents dated 12/13

July 2022

- Planning Inspectorate Overview/What happens next
- Wiltshire Archaeological and Natural History Society response

- **Media reports:**
  - New Civil Engineer, 26 August 2022 'UNESCO continues to push for alternative to planned Stonehenge Tunnel' (subscription) Read here as PDF
  - Mail Online, 2 September 2022 'Unesco says 'substantial' amendments are needed to controversial £1.7billion two-mile tunnel near Stonehenge – after planning officials warned it would cause 'permanent, irreversible harm' to the World Heritage Site'

Redetermination: process grinds on



Grant Shapps remains Secretary of State for Transport during a period of Westminster upheavals. Photo: Sky news

Context

The Secretary of State for Transport, Grant Shapps, wants to redetermine the Development Consent Order (DCO) for the very same Stonehenge road scheme condemned by UNESCO, the panel of five independent planning inspectors, and hundreds and thousands of our supporters, following the High Court's quashing of Shapps' decision to go ahead in 2020.

Redetermination has grown into a protracted 3-way ping pong between Grant Shapps, the applicant National Highways [NH], and interested parties consulted on numerous aspects. Our responses to the Transport Secretary's further questions on all aspects were published on the Infrastructure Planning website in a single document file. They are published below under separate topics and deadlines.

Our overarching conclusion

The Stonehenge Alliance considers that the DCO application for the Stonehenge new road scheme should be refused for legal reasons, and because the adverse impacts of the proposal would outweigh its benefits. These, and other aspects, are explained in detail in the links to our responses below.

> *"There is only one sane outcome to this process and that is for Grant Shapps to refuse permission for this highly damaging road scheme. National Highways remains in complete denial about the impact of its plans for the Stonehenge landscape.*
>
> *If Grant Shapps refuses to take the sensible course and tell National Highways to go away and come back with something better, then at the very least he should hold a new public examination." Tom Holland, 26 April 2022*

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4 April 2022 deadline:

Stonehenge Alliance responses to the Secretary of State's Statement of Matters of 30 November 2021 and the Applicant's (National Highways) responses

1. Covering note and legal submission: prepared by Dr Kate Fielden with advice from Victoria Hutton of counsel

Summary of content: The Stonehenge Alliance is of the view that the Secretary of State's proposal to re-determine the scheme under Rule 20(2) of the Infrastructure Planning (Examination Procedure) Rules 2010/103 is unlawful. Our arguments in relation to this are in our response in the above

link.

2. Alternatives: prepared by Dr Kate Fielden, Dr Simon Temple and Chris Todd with advice from Victoria Hutton of counsel

Summary of content: The Stonehenge Alliance campaigns for the protection and enhancement of the World Heritage Site (WHS) and its setting. The Proposed Scheme for road widening would not give that protection. We therefore consider that the scheme should be rejected. In **Section 6** of our paper we suggest ways in which traffic flow could be improved, some of which would address the current Climate Emergency which was not of major concern when the Scheme was announced in 2014.

3. Environmental Information Review: prepared by Dr Kate Fielden, Andy Norfolk Dip LA MSc, and with reference to specialist advice by Dr George Reeves CGeol CEnv PhD MSc BSc FGS FIMMM, Clive Bentley CEnv, CSci., MCIEH, MIEnvSc. MIOA and Rupert Thornely-Taylor Noise & Vibration Consultant

Summary of content: Response to matters relevant to

- Cultural heritage (Section 2)
- Landscape and Visual assessment (Section 3)
- Biodiversity (Section 4)
- Noise and Vibration (Section 5)

Our response references evidence presented to the Examiners in 2019.

4. Transport, Carbon and Economic Issues: prepared by Dr Simon Temple, Professor Phil Goodwin, and Chris Todd

Summary of content: This response is limited to National Highways' submission at the time. The Secretary of State for Transport requested a further update on carbon (see deadline 3

August below).

- Our view is that the Secretary of State for Transport should reject National Highways' defence of its argument to proceed with its project, because its case is fundamentally flawed in numerous respects: NH has failed to robustly demonstrate the need for the scheme and the harms it will cause.
- The Secretary of State has already accepted that it will cause permanent and irreversible harm to the World Heritage Site and other assets. Evidence since the date of the Secretary of State's decision reveals that the damning comments made by the Examining Authority and agreed by the Secretary of State are in fact underestimates of the harm.
- Further harm will arise in the context of carbon emissions (including through road traffic and embodied carbon), landscape and other harms previously outlined in our Examination submissions, set out in submissions made as part of this post-quashing exercise and inconsistent with current Government policy on Decarbonising Transport, 6th Carbon Budget and advice of the Climate Change Committee in a climate emergency.
- These harms could be avoided through alternative means and in the context of a scheme which risks the WHS losing its world heritage status the availability of alternatives (which has not been properly addressed by NH) should be given considerable weight.

5. Geology, Ground Investigation and Groundwater Monitoring: prepared by Dr George M Reeves

Summary of content: Based on 14 reports made available to the Stonehenge Alliance in 2022 following repeated requests for data from 17 April 2019 onwards. These packages of reports are described in Section 2.

This technical report lists concerns and risks:

- Main Issues for Concern [Section 4.1]
- Groundwater Disruption with particular reference to Blick Mead [Section 4.2]
- Subsidence and potential damage to undiscovered archaeology [Section 4.3]
- Conclusions and recommendations highlight the lack of benefit to the Examining Authority to examine and interrogate the data that has since been submitted, matters that could cause considerable cost and time over-runs in completing the works proposed. [Section 5]

6. Any Other Matters: prepared by Dr Kate Fielden with assistance of Victoria Hutton of counsel

Summary of contents:

- World Heritage Committee, its status, function, and advice relative to NH's views [Section 1]
- Findings of the Secretary of State concerning the Proposed Scheme [Appendix]

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10 June 2022 deadline:

Stonehenge Alliance response to the Secretary of State's call for further comments on the Applicant's updated information on carbon

Updated Carbon Issues: prepared by Dr Simon Temple, Professor Phil Goodwin, and Chris Todd

Summary of contents:

The Alliance continues to be concerned that NH is failing to properly assess the carbon emissions from its road schemes, including the A303 Stonehenge project.

We point out weaknesses and contradictions in NH's

submissions. For instance in its response to meeting carbon targets NH which revealed two incompatible facts:

> If NH implements government policy on carbon reduction, traffic will reduce or stabilise, thus traffic forecasts would no longer justify the scheme.
>
> Or
>
> By providing for an increase in traffic, and thus an increase in carbon, NH is planning for a decarbonisation policy failure.

Which scenario is NH aiming for?

We highlight:

- Inconsistency with Government's Transport Decarbonisation Strategy [Section 2]
- National Highways' failure to follow IEMA (Institute of Environmental Management & Assessment) guidance to minimise emissions [Section 3]
- NH together with its own guidance appears to downgrade the importance of the carbon impact of their projects – it diverges from EIA (Environmental Impact Assessment) guidance and is at odds with Parliament's declared climate emergency [Sections 4 and 5]
- Cumulative Impacts and means of assessment [Section 6]
- We doubt the competency and thoroughness of the assessments carried out by NH [Section 7]

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3 August 2022 deadline: responses published 25 August

The Secretary of State issued a letter on 20 June

requesting further comments from the Applicant on issues raised by Interested Parties in commenting on NH's responses including tunnel extensions.

Stonehenge Alliance responses by topic area:

1. Review of environmental information including cultural heritage, tunnel extension and other planning issues
2. Transport issues and alternative options
3. Geology, soils, vibration and adverse impacts of tunnelling through chalk

Our commentary on responses including UNESCO's Advisory Mission report published at the same time in 'Short tunnel is no short cut. Back to the drawing board?'

Redetermination: Transport Secretary would like to hear from you



Western tunnel entrance proposed in 2019, and re-proposed by National Highways in 2022. Image by National Highways, 2019.

Grant Shapps is reviewing the A303 Stonehenge road widening scheme

The Secretary of State for Transport wants to make a new decision on the Stonehenge road scheme. He asked National Highways for responses to five matters he wishes to consider:

- **Alternatives,**
- **Policy,**
- **Carbon,**
- **Environmental Information, and**
- **Any Other Matters.**

National Highways has responded. **(See "Documents" tab in this link)** and the Secretary of State for Transport has now invited **comments** on these submissions and any other relevant

information. It's not straightforward to pick these out. National Highways have offered to send their documents electronically on a USB free of charge on request **here**.

The 50 documents by National Highways, however, are technical, lengthy and cross referenced. The Stonehenge Alliance and its expert advisers are preparing a full technical response which we will share in due course. Nevertheless, it is most important that the Secretary of State for Transport hears from the wider public on these issues. We're therefore asking **as many people to respond as possible**, raising some or all of the points below.

Comments must be submitted to A303Stonehenge@planninginspectorate.gov.uk by 23.59, 4 April 2022.

If you can, please make the points in your own words and add any other points you might wish to make.

National Highways has not:

- **made any changes to the Scheme to take the 2021 World Heritage Committee Decision into account;**
- acknowledged that the Secretary of State found the Scheme's impact on the proposed western cutting area would be "**significantly adverse**";
- **fully assessed alternative routes less damaging to the World Heritage Site** e.g., a southern bypass route would be cheaper even if there might be some problems with it, while a longer tunnel would reduce impact on the World Heritage Site;
- **explored alternatives to hard engineering** solutions in the context of safeguarding and enhancing the World Heritage Site – e.g. a package of measures to reduce road traffic, road emissions and improve access to the South West;
- updated the scheme construction costs; nor

- updated the carbon assessment and costs.

Other changes since the Examination closed:

- concern for climate change has increased with the latest Intergovernmental Panel on Climate Change report and the need to take urgent action to reduce emissions, not increase them as any new Stonehenge road scheme would; and
- the Environment Act 2021 sets new ambitions around nature recovery.

Please ask for a re-examination of Development Consent Order

In our opinion the omission on current cost estimates, UNESCO's position and new information since the Examination closed in October 2019 are compelling grounds for a re-examination by an independent panel BEFORE the Secretary of State redetermines an application for a DCO for the very same road scheme.

Please email your responses by 4 April to: A303Stonehenge@planninginspectorate.gov.uk, remembering to include your name and address.

THANK YOU for your help and continued support.

If the Planning Inspectorate sends you a standard bureaucratic reply (as per below) DO NOT be discouraged! Your comments will be read, and we hope will be published. But they'll only be published at the discretion of the Transport Secretary, unlike those who participated in the Examination in 2019 who are known as 'Interested parties'.

"Thank you for your email, I can confirm receipt of your comments. These will be forwarded to the Secretary of State (SoS) however as you are not a registered Interested Party it will be at the discretion of the SoS whether or not your comments are accepted. If they are accepted they will be published on the project webpage of the National Infrastructure Planning website in due course.

Regards, Max Baldwin

NSIP Officer, National Infrastructure Planning

The Planning Inspectorate

Helpline: 0303 444 5000

Email: max.baldwin@planninginspectorate.gov.uk"

More details: www.StonehengeAlliance.org.uk @SaveStonehenge



For map, images and visuals of the road scheme please link here.

Redetermination: National Highways responses

UPDATE 24 February 2022: SUBMISSIONS BY NATIONAL HIGHWAYS AND SECRETARY OF STATE FOR TRANSPORT'S CONSULTATION ON THESE SHOULD BE VIEWED ON THE

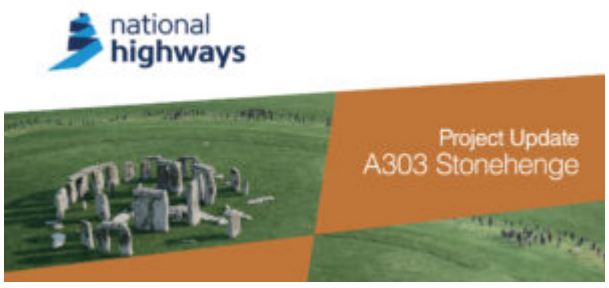
PLANNING INSPECTORATE'S SITE HERE

The Transport Secretary's decision to proceed with the A303 Stonehenge road widening scheme was roundly quashed by the High court last July. Instead of appealing the judgment Grant Shapps has decided to go down the route of 'redetermination' of the scheme.

His Statement of Matters issued on 30 November 2021 has been responded to by the Applicant, National Highways, (see bullet points in Paragraph 2). Consultation with Interested Parties has not been invited but is promised in due course.

National Highways' submission is in the form of a series of separate replies published on the Planning Inspectorate's website here. It met Shapps' deadline of 11 January 2022 but the response on the environment is incomplete as noted by NH to the Department for Transport here:

> *"The Applicant notes that the response to Bullet Point Four of paragraph 2 of the Statement of Matters, accompanying this letter, references a number of technical reports that have been undertaken by the Applicant to provide an updated understanding of the baseline environment in which the Scheme is proposed to be constructed and operated . . . it is the Applicant's intention to submit these reports . . . within a few weeks and will confirm the proposed date of submission as soon as possible after the date of this letter."*



National Highways responses have been linked here for ease of reference:

- Cover letter from National Highways – 1.0 letter from Stonehenge Project Director to Department for Transport
- Response to Bullet Point One – 1.1 – Alternatives
- Response to Bullet Point Two – 1.2 – Policy
- Response to Bullet Point Three – 1.3 – Carbon
- Response to Bullet Point Four – 1.4 – Environmental Information Review *[Incomplete, see above]*
- Response to Bullet Point Four – 1.4.1 – Environmental Information Review Appendix: Transport Assessment Review
- Response to Bullet Point Five – 1.5 Any Other Matters

List of Acronyms

AADT – Annual Average Daily Traffic
COBA-LT – Costs and Benefits to Accidents – Light Touch
DMRB – Design Manual for Roads and Bridges
DCO – Development Consent Order
EIA – Environmental Impact Assessment
NPFF – National Planning Policy Framework
OBC – Outline Business Case
OEMP – Outline Environmental Management Plan
PIA – Personal Injury Accident
RTF – Road Traffic Forecasts
SoS – Secretary of State's
SoCG – Statement of Common Ground
SoM – Statement of Matters
TA – Transport Assessment
TPG – Transport Planning Group
V/C – Volume over Capacity