

**CPRE Wiltshire response to Highways England consultation on A303 Amesbury to Berwick Down scheme**

To whom it may concern,

**A303 Stonehenge Consultation**

Dear Sir or Madam,

*Introduction*

CPRE Wiltshire Branch is an independent charity limited by guarantee and affiliated to the CPRE National charity. Our objects are broadly to campaign for a beautiful, living countryside. We work to protect, promote and enhance our towns and countryside to make them better places to live, work in and enjoy, for now and for future generations.

CPRE Wiltshire Branch has been involved in discussions about and proposals for Stonehenge for over 30 years. As members of the Stonehenge Advisory Forum we helped to prepare successive Stonehenge Management Plans and the current combined Management Plan for the whole World Heritage Site (WHS). Our membership, which numbers approximately 1,000, is kept informed about our activities concerning Stonehenge via our website and newsletter, *Wiltshire Voice*.

CPRE Wiltshire Branch is supported by national CPRE in its objection to the current proposals for the A303 at Stonehenge. We support the objections and concerns raised by the Stonehenge Alliance, some of which we also address in this response.

Owing to the paucity of detailed information provided in Highways England's Technical Appraisal Report, we are unable to comment fully on the proposals before us.

*Our response to Highway England's Questionnaire concerning proposals for the A303 between Amesbury and Berwick Down.*

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

We strongly disagree with the option before us.

The 2.9km tunnel is inadequate to protect the WHS and its setting as is required by the protective planning framework; it would also be in conflict with the Government's commitments under the terms of the World Heritage and Valetta Conventions and the WHS Management Plan. In relation to the natural and water environments, it would bring adverse impacts to biodiversity, including adverse impacts on protected species and designated areas recognized under the Habitats Regulations. There would be adverse impacts on landscape overall. Insufficient information has been made available fully to assess the impacts of tunnel and road building.

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

We strongly disagree, for reasons given above and because of the impact of the tunnel portals and new dual carriageway on the setting of the ancient Avenue. To suggest that this feature would be restored by the proposed works gives no regard to the imposition of major new infrastructure right beside it and compromising its integrity.

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

Again, we strongly disagree, for the same reasons as given above. The western portal and expressway would form a highly adverse intrusion into a tract of countryside that is at present tranquil and archaeologically of considerable importance in its own right, and integral to the WHS as a whole. The scheme appears to overlook the critical significance of the landscape to the prehistoric inhabitants who modified it to meet their needs, using its topography for the deliberate disposition and interconnectivity of monuments and sites: thus, presumably, enhancing the experience of passing through it to reach the Henge. The scheme treats the Henge and its immediate surroundings as of paramount importance, when it



seems highly likely that arrival at the Henge was the culmination of a significant journey towards it through the landscape, sometimes within sight of the Stones and sometimes not.

We are also very concerned about the proximity of the western portal to the RSPB bird sanctuary on Normanton Down and the potential disturbance of wildlife in the woodlands close by the proposed engineering works.

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

We are opposed to the A303 scheme as proposed principally because of the damage it would do to the WHS and its setting. Since the bypass is a part of the A303 scheme, we cannot separate our concerns to opt for one or other bypass at this stage. Both bypasses would have serious impacts on the natural and historic environments west of the WHS – about which we have been given virtually no useful information upon which to form any opinion. Nevertheless, we consider that a bypass ought to be provided for Winterbourne Stoke and see no reason why it should be attached to the road scheme across the WHS. Noise and air quality impacts of a bypass should be taken very much into consideration.

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

Damage to archaeology and setting (notably Blick Mead Mesolithic site); pollution of the River Avon SAC and variations in its flow both during and after construction; air quality and noise impacts for residents of Countess Road and Amesbury (close to the junction); impact on the setting of the WHS.

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

No information has been supplied on this feature of the scheme. Clearly it could have a major adverse impact on the WHS, archaeology and setting. It could also have adverse impacts on landscape and biodiversity.

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

We have been given far too little information about the impacts of the scheme. It is evident that much information relevant to our understanding of the project and the problems arising from it has yet to be obtained by Highways England. Thus the consultation is both inadequate and premature.

No information has been given on crucial elements such as signage, lighting, gantries and emergency lay-bys. We consider the exhibition videos misleading in this respect.

Statements about impacts on archaeology, heritage, landscape and the natural environment are not substantiated by detailed evidence. There are no archaeological reports on work undertaken and we understand that further work will be necessary. There would be highly adverse environmental impacts on Conservation Areas, Listed buildings and Amesbury Abbey Listed Park and Garden.

We consider the heritage impact assessment to be highly questionable for a cultural WHS. It is said that the outstanding universal value (OUV) of the WHS would be protected when it clearly would not be. The obligation under the WH Convention is to protect the WH property: in so doing, its OUV is protected – but not otherwise.

The scheme is primarily a road scheme. That it would pass through a WHS is an important fact that cannot be overcome by acknowledging the importance of the WHS and, at the same time, providing a solution that is inadequate to protect it. We question the need for the scheme under the criteria put forward by the client and the lack of convincing alternatives. Assumptions about economic benefits to the South West apparently depend upon hearsay, not data.

If road widening is necessary, whatever is decided upon should not damage the WHS and its setting.

We note the overall negative impacts of the scheme as reported in the TAR, including the early assessment and sifting tool exercise showing a poor financial case and a neutral commercial case for Corridor D routes now under consideration.

**Question 8. Feedback on this consultation: how did you hear about it?**

We were informed by letter.

**Question 9. Do you have any feedback on this consultation – events, information provided, advertising etc.**

It appears that, in the main, only local views are being sought for a road scheme of national importance and a WHS of international significance. We find this puzzling.

We deplore the lack of information that is needed to comment from a knowledgeable standpoint concerning most issues arising from the scheme.

Patron: HM the Queen; President: Mrs Sarah Rose Troughton, HM Lord-Lieutenant of Wiltshire; Vice President: George McDonic MBE

The Campaign to Protect Rural England Wiltshire

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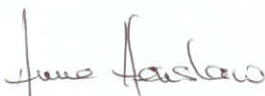
## PROTECT WILTSHIRE

Our representative was invited to attend a single Traffic and Access Stakeholder Group meeting that offered no more than a presentation of the scheme in general, including the client's aims and reasons for it. There was no useful discussion of options under consideration; indeed none was revealed.

Finally, we have serious doubts about the validity of consultation that provides minimal information and none at all on a number of critical issues. The proposed scheme conflicts with basic policies for protection of the historic and natural environment and we have seen no justification for damage to these interests on the grounds of need and/or affordability.

If the Government indeed considers it necessary to proceed with widening the A303, the scheme should be halted and reconsidered so that any consultation may be properly supported with all the necessary information. This should follow informed consultation with independent stakeholders (i.e. not simply declared supporters or promoters of the scheme) on the appropriate approach for such a sensitive environment, and involving a public choice from options based on sound and unambiguous evaluation.

Yours sincerely



Anne Henshaw

Chairman CPRE Wiltshire