

A303 Stonehenge (Amesbury to Berwick Down) 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 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 rerun the consultation

We object to the way that Highways England (HE) has carried out this process. We are concerned about the lack of time for the consultation, the failure to advertise more widely, including nationally and internationally, and the lack of options for people to comment on.

While we acknowledge that the timeframe for the consultation at seven and a half weeks is slightly longer than the standard six week consultations that HE usually carries out, it is not adequate to allow full engagement with people nationally and internationally. Seven and a half weeks is an odd length of time to have chosen and it is significantly shorter than the ten week consultation that was held on the A27 at Chichester. There, nationally important assets were only marginally impacted upon by HE's proposals, unlike here where the proposals would have a significant and detrimental impact upon an internationally important site.

Given the international significance of Stonehenge World Heritage Site (WHS) and the expectation by the International Council on Monuments and Sites (ICOMOS), as expressed in their mission report published last year (April 2016), that heritage considerations should be placed at the heart of this process, we are disappointed to see little evidence that HE is following a different path to usual. This is further illustrated by the very limited options presented during the public consultation, which seemed to be based upon arbitrary cost limits, rather than heritage value.

We strongly believe that the consultation needs to be re-run with a full and proper set of options and for a longer period of time. The assumption presented in this consultation is that there has to be major roadbuilding and only as put forward by Highways England, but this has not been proven by the information provided. The growing concern among archaeologists about the impact of these proposals on the WHS should be reason enough for the process to be halted and a fresh approach to be taken.

1.3 Rejection of both options

We do not support either of the two options presented during the public consultation. Both offer the public limited chance of input as the major part of the project was fixed, with only the western end of the route, the bypass around Winterbourne Stoke, being negotiable. The position and length of the tunnel was not up for discussion. Yet the position and length of the tunnel is critical to its impact on the WHS.

A 2.9km tunnel for a road traversing a 5.4km wide WHS is clearly not long enough to avoid causing substantial damage to the landscape and archaeology there. It will result in around 1.6km of new surface dual carriageway within the WHS on its western side. This does not seem to be the product of a process that has placed heritage considerations at its heart as ICOMOS requested. Therefore, it is 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. This now places the UK Government in a compromised position given its international undertakings to UNESCO to safeguard the archaeology and landscape of Stonehenge WHS.

While technically, there was a third option of a surface bypass around the southern edge of the WHS, this was dismissed by HE and the public were steered away from commenting on it, not least because of the way the consultation questions were framed.

We believe that a full range of options, including strategic and local interventions, for both road and sustainable transport, including demand management measures, should be consulted upon.

1.4 The case for a new or expanded road has not been made

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.

1.5 Cumulative impacts not addressed

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 are 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, 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.

These issues should be properly spelt out and considered within any new consultation.

1.6 Other environmental impacts

While concerns about the impact on the WHS are cause enough to drop these plans, there is also the impact on the natural environment, including the nearby RSPB reserve which is a haven for endangered stone curlews. Apart from any physical disturbance to their surroundings, the noise pollution from the faster, bigger and more heavily trafficked road could also impact on breeding.

While neighbouring communities including Winterbourne Stoke could see some benefits, they could still be adversely affected by noise pollution and air pollution from any new road. To date, they have not had adequate responses to their concerns.

1.7 Vulnerable road users

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. 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.

1.8 Conclusion

Overall, we are not happy with this consultation and the robustness of information provided. This process needs to be re-run to provide the public with a genuine range of options that cause no further harm to the WHS. To date it appears to have been artificially constrained by a budget set without any reference to what is at stake within and around Stonehenge World Heritage Site.

We strongly oppose both so-called 'options' presented during the consultation as they are virtually the same as regards their impact on 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.

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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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