



CPRE South West

Chairman

Janette Ward

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28th February 2017

Dear Sir/Madam

A303 STONEHENGE CONSULTATION RESPONSE

CPRE South West represents the seven county branches in the South West of England and thousands of individual CPRE members. Our letter should be read in conjunction with the detailed response submitted by CPRE Wiltshire.

We are grateful for the opportunity to respond to the consultation on the proposals for managing the impact of the development of the A303 Expressway and protection of the World Heritage Site (WHS) at Stonehenge and we would like to begin with the following general statement:

We feel that this consultation is fundamentally flawed. We are presented with only 'one' option that will cause damage to a globally important site, and will not, as intended, improve the tranquillity and setting. In addition to this, we consider that it will fail to provide benefit to local communities and business. Furthermore, 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. Statements about impacts on archaeology, heritage, landscape and the natural environment are not substantiated by detailed evidence. Thus, we believe that the consultation is both inadequate and premature.

CPRE South West strongly disagrees with the 2.9km tunnel proposal across the WHS. In our view this will cause irreparable damage to this globally important cultural site and, more generally, to the surrounding cultural and natural landscapes. We value not only the currently known heritage, but equally, the considerable amount of heritage still to be discovered, which is an invaluable part of our nation's cultural capital. Recent excavations of Mesolithic heritage highlight the hidden wealth of the site yet to be fully understood and which is put at risk by this proposal.

The Campaign to Protect Rural England exists to promote the beauty, tranquility and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

The iconic stones and the wider WHS at Stonehenge sit within a largely open, downland landscape which supports important wildlife and biodiversity. CPRE SW is concerned that all infrastructure developments in the sub region should comply with the commitment made by the UK government to "leave the natural environment of England in a better state than that in which we found it". We believe this proposal runs contrary to that stated commitment.

We would also like to make the following, specific points:

- The proposed 2.9km tunnel is far too short. The WHS is 5.4km wide, so the tunnel and the accompanying new road, tunnel portals and major junctions would result in irreparable damage to archaeology and landscape in direct contravention of UK planning policy and the Government's commitments under the terms of the World Heritage Convention and Valetta Conventions and the WHS Management Plan.
- The proposal would increase traffic, noise and light pollution through the WHS, and the lighting and signage required for a high speed route will alter the dark skies at present to be found around the WHS and in this part of rural Wiltshire.
- Recent archaeological work within the WHS shows the emerging significance of Stonehenge and its surrounding area. The site has to date been largely protected from incursion by modern building schemes and planning developments. However the designation of the A303 as an Expressway, with the associated above surface structures (gantries, lighting, split level access) and two major portals within the WHS itself will dramatically change this. We note that the details of the signage, gantries, lighting and emergency lay-bys are not included in this consultation, which is a concern as it means consultees have not been shown an accurate picture of the impact that this scheme will have on this globally important landscape.
- In addition we are concerned at the impact of the expressway on this rural area of south Wiltshire. Here "soft" tourism in the form of appreciation of landscape, tranquillity, heritage and culture is an important part of the local economy and is not fully quantified in any of the supporting documents behind the road proposal. The historic, cultural and natural environment plays a key role in the local and wider economy, bringing in valuable business from the UK and abroad, supporting local small enterprises in this rural area as well as the adjacent urban areas such as Salisbury.
- From our experience and knowledge of the sub region, and from a careful study of both Google's congestion maps as well as Highways England's own figures, the road plays a rather more local role than purely as an end-to-end expressway. The subtle and vital connections into local towns and smaller communities will be irreversibly changed by this proposal yet no appraisal of these has been made as part of the overall planning process.
- In our view the evaluation made of the economic advantages of turning the A303 into an expressway (A303/358/30 Corridor Improvement Programme Economic impact study Feb 2013) is not sufficiently rigorous or inclusive. This study is light on local information and is in considerable disagreement in its final analysis with the more thorough "London to South West and South Wales Multi Modal Study" report carried out by Halcrow Group Ltd for the Government Office for the South West in 2001.
- The figures presented by Highways England at the last of the Taunton consultation meetings, but not made public as yet, predict that the traffic on the road will grow between 25% and 55%. The impact on the WHS and its rural downland setting in the light

of these predicted figures has not been assessed as a part of the overall assessment, and not made available to local consultees. We believe that this error must be urgently rectified.

Fundamentally, we believe that connectivity for the South West could be achieved in far less damaging and intrusive manner. There remains the desire for a robust railway link from Waterloo to Exeter and beyond via Basingstoke. Improved internet services would dramatically improve the business viability of the rural areas of the South West.

We do not believe that Government wishes to develop a road scheme that will damage 'forever' what is one of the most important, iconic, special and loved places within the UK and worldwide. We believe the current proposal is significantly flawed and that if there is anywhere for taking a more enlightened, strategic and long term investment approach to transport development, surely it must be here.

We hope you will take our views into account

Yours faithfully

Becky Collier

Admin Support - CPRE South West