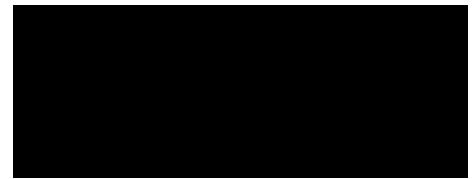




Amesbury Museum & Heritage Trust



28<sup>th</sup> September 2022

National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Dear Examining Authority,

**TR010025 – 002292 Re-Determination of the Application by National Highways  
(formally Highways England) for an Order granting Development Consent for the A303  
Amesbury to Berwick Down – Unique Reference 20020871**

It appears that National Highways care not to answer or allay our concerns and instead have chosen to repeat their belief that the scheme they have already had rejected by the planning inspectorate and by judicial review remains the best solution!

Please find below our response of 3<sup>rd</sup> August 2022 and the comments we made on 3<sup>rd</sup> April, regarding the above re-determination which remain valid and for which we also repeat and request a response.

3<sup>rd</sup> August 2022

On behalf of the Amesbury Museum and Heritage Trust I thank you for your letter of 13<sup>th</sup> July 2022 regarding the above and for providing the link to the Secretary of State's (SOS) request for further comments from all interested parties.

We have studied the latest revised documents submitted by National Highways to the SOS as part of the redetermination process and wish to comment as follows:

Our response of 3<sup>rd</sup> April covered many important issues. None of these appear to have been addressed.

We therefore resubmit below our comments 1-7 again and request these are addressed as well as additional points now added below these.

1. At the preliminary meeting on April 2<sup>nd</sup> 2019 and in writing (through the S51 advice) we requested how the applicant would address the covenants set out in the conveyance and deeds relating to the sale of the land on 23<sup>rd</sup> October 1915. There was no response; however, the response following the meeting implied that any



documents pertaining to the original sale were “missing” and therefore no longer deemed extant and that the covenants in the deed of gift to the Nation in 1918 were subsequently extinguished. We contest this as the deeds from 1915 are not missing and therefore the matter of extinguishing the covenants has not been dealt with in accordance with the Landlord and Tenants Act 1925 section 84 which would be relied upon. Until such matters are resolved we consider that the current proposed tunnel will breach one of the 1915 covenants.

2. The exploration of alternative solutions to the specific question of the A303 Amesbury to Berwick Down did not form part of the public consultation, leaving no substantial debate or discussion pertaining to regional cost effective transport solutions. The current scheme as proposed gives no tangible benefit to wider transport issues and arguably will lead to significant local traffic, environmental and heritage impacts, to which we object.
3. The Scheme as set out, proposes to put a significant concrete twin bored tunnel with its lowest point, below Stonehenge Bottom. The impact on the water table in the wider landscape and the contaminated road surface water flowing into the lowest point of the tunnel will require permanent water pumping and management to ensure adequate movement of water into the landscape. We can see no end of life costings or plans for removal of the scheme when the tunnel reaches its end of life, further can see no carbon calculation in accordance with the carbon budget for this or any life management of the water flow when the tunnel is no longer in use.
4. The Applicant fails to show how the landscape will be restored at the end of the tunnel’s short life or how the water management will be addressed to prevent any further environmental and heritage damage.
5. The proposals make no mention of any organic archaeological features that may be impacted by changes in the water table at Bowles Hatches.
6. In responding to the Secretary of State for Transport’s proposed Redetermination of the A303 Amesbury–Berwick Down (Stonehenge) Scheme, the Applicant has apparently made no reference to the significant decline reflected in recent patterns of official visitor numbers to the site.
7. Should the Secretary of State conclude that the redetermination proceeds beyond this point we believe a re-examination of the scheme is essential.

Additional points relating to National Highways Re-Determination Document reference 4.3. which we would like the Secretary of State to take into consideration.



8. National Highways state in their re-determination document 4.3, page 8 of 81 that their responses regarding an extension to the Western Portal and the construction of three roundabouts with traffic signals to the West of Long barrow Junction do not have a Heritage Impact Assessment that is peer reviewed. How can the Secretary of State or indeed any professional body make any assessment of the impact of this significant change without peer reviewed information?
9. National Highways state on P.19 of re-determination document 4.3 that the WHS setting study is **not expected until 2023** and that ICOMOS guidance is also **not available**. Again we consider the response unable to be adequately commented upon until all details are available .
10. National Highways state on P.29 5.2.9 of re-determination document 4.3 that the proposed new Longbarrow junction will not be lit by street lighting and this will be mitigated by the use of traffic signals. We would like clarity on how National Highways intend to manage safely lane closures for the regular over-night tunnel maintenance or breakdowns without permanent or temporary lighting at the cross over points outside the tunnel portals, without impacting the view of the night sky in the World Heritage Landscape.
11. National Highways state on P.29 5.2.11 of re-determination document 4.3 that there will be a 5 stage diversion whilst the tunnel is built. We request details of how the temporary diversions will be lit at night without impacting the night sky within and adjacent to the World Heritage Site.
12. National Highways state on P.36 6.1.6 of re-determination document 4.3 that there will be an increase in noise levels at both portals. We request details of the maximum noise levels likely be experienced in comparison to the existing road. In particular at the Eastern Portal adjacent to the Grade 1 listed Amesbury Abbey nursing home and local historic properties.
13. National Highways states on P.40 8.2.2 of re-determination document 4.3 that the existing A303 impacts attributes of the OUV. We would like to point out that the impacts referred to as A, B, C, F & G will be significantly worsened by the introduction of an East West flyover of the Countess Junction as well as the introduction of overlooking issues of traffic into the Grade Two \* listed Abbey Parkland and Bowles Hatches.
14. National Highways states on P.44 8.3.2 of re-determination document 4.3 that the impacts and effects for the Bored Tunnel Extension are summarised in Table 3, and detailed. However the reference source is not found. We request a working link and time to analyse this information.



Yours sincerely,



Andrew Rhind-Tutt - Chairman of the Amesbury Museum and Heritage Trust