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15th May 2019

The Inspector and Examining Panel
A303 Amesbury to Berwick Down Case Team
National Infrastructure Planning
The Planning Inspectorate
Temple Quay House
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Dear Inspector

A303 Stonehenge EiP

At the Preliminary Meeting, amongst miscellaneous interventions, I made two points that I feel were probably regarded as displaying a negative attitude to this Inquiry:

- 1) That I felt an overpowering sense of inevitability about the EiP process.
- 2) That Climate Emergency did not figure at all in the process.

Inevitability: In the first point I linked to the question of whether the panel, if it were minded to approve the scheme, could recommend a restriction on the construction that would bring it to a permanent halt if there were found to be archaeological remains in the way that would be regarded as of exceptional importance. This was something of a contrived question, since I think we all know that once a road scheme is started it will not be stopped and no recommendation of the panel's will count one jot in the doings of the DfT and Highways England.

And this is the main point I make about inevitability. I have been actively involved in at least 15 road inquiries over the last 44 years, including the last Stonehenge one. In one case (a local authority scheme) we persuaded an Inspector on the grounds that traffic evidence did not demonstrate what the proponents were claiming. In just two cases can I say that the environmental case figured at anything more than lip-service level in the recommendations put forward by Inspectors. Of those two cases (a local authority scheme and the 2nd of the four Inquiries for the M3 at Winchester) one remains a local authority ambition, which is being encouraged under the new MRN programme (where schemes are being approved without any public examination whatsoever) whilst the M3 Itchen Valley scheme merely led to the replacement by the, admittedly less damaging, but still disastrous Twyford Down scheme,

approved by two more, decidedly cynical inquiries. I fear rubber-stamping because that is my experience.

The fast-track examination process for the so-called Nationally Important Infrastructure can only be seen by environmentalists as a further speeding up of a rubber-stamping procedure. Regardless of the integrity of the panel and the Planning Inspectorate, there cannot be a getting away from the clear intention of an environmentally antagonistic government to circumvent as much environmental protection and examination as possible. Cross-examination of the proposing authority on the fundamentals of its case (appraisal methodology, especially for wider-than-scheme impacts; economics of a highly subsidised activity; traffic forecasting; induction effects; biodiversity network compromises; climate effects, etc.) has been conveniently eliminated from the process.

Climate Emergency: This brings me to my second point, which was that climate consequences apparently count for very little in this examination. The Preliminary Meeting document stated:

*whilst the effects of the proposal on the achievement of sustainable development including the mitigation of, and adaption to, climate change are not listed as specific Principle (sic) Issues.....
the ExA will conduct all aspects of the Examination with these objectives in mind.*

My request was that climate consequences, being far and away the most important matter before you, ought to be the subject of a separate hearing. The only reference to the matter (the statement above) seems to me to be empty of all meaningful content. It says no more than Nigel Lawson or Donald Trump would say. There is in it no recognition of a Climate Emergency.

Yet Parliament has agreed with the IPCC that there is a Climate Emergency, that there is an imperative for drastic action over a very short period. If the Panel does not accept this then it ought to have a hearing in which the case against it is made (goodness knows by whom). If the Panel does accept this then it ought to state it at the outset as a fundamental principle of the EiP. And if that were the case then there would be a need for a hearing, before all other hearings, to establish whether there could be a possible case for any expansion of capacity.

I cannot imagine how such a case could be made, nor is there any evidence that the proponents of road expansion have ever argued such a case, certainly not since the SACTRA Report demonstrated (and was accepted as demonstrating) that road building generates traffic. Road building increases carbon emission overall. Of course the promoters of road expansion, like those who argue for airport expansion, make wild hand-waving assertions of a future reliant on magic bullet technology, which somehow takes away the responsibility of the present generation to protect the world for the following generations. But no government department

(least of all the DfT) has ever demonstrated that there will be or can be a plausible decoupling between transport growth, as currently conceived,¹ and climate impact.

For me the case that road expansion is entirely inconsistent with action to prevent climate disaster is much more than *prima facie* – it is as near to being irrefutable as any matter that could come before rational people. If, however, the Panel were of the mind that such a case could be made, then it ought to have a hearing in which it could be aired.

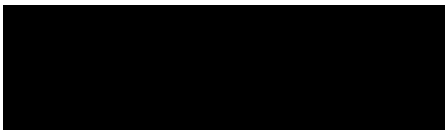
Conclusion: The Elephant in the room cannot be ignored. If the Panel does not accept that there is a Climate Emergency (which Parliament has declared) then it must surely take evidence in which the case of no Emergency can be examined. If the Panel does accept that there is a Climate Emergency, but does not accept that road expansion is inimical to dealing with that emergency, then it must surely take evidence that makes or refutes that case.

The matter has logically to be decided at the outset, for if the Panel were satisfied that road expansion is inimical to tackling the Climate Emergency, there would be no point in continuing the Inquiry.

I would love to think that the Panel will take the Climate Emergency seriously, but fear, from the downplaying of it in the Preliminary Meeting, that it will not.

I have signed up to attending the hearing on traffic and transport, but, like Sydney Smith, with no great expectation of any good coming of it.² I am getting too old for belief that things will change where they ought to change, but still see hope for my grandchildren in the earnestness of a 16-year-old Swedish schoolgirl.

Yours sincerely

A solid black rectangular box redacting the signature of Christopher Gillham.

Christopher Gillham

¹ By which I mean the continuing growth of individual motorised mobility. One can imagine growth through the efficiency of shared mobility – i.e. a behaviour change towards public transport.

² Sydney Smith to Monckton Milnes: *I am just going to pray for you at St Paul's but with no very lively hope of success*