

A303 Amesbury to Berwick Down

Open Floor Hearing, 22 May 2019

Written summary of oral submission put by Mike Birkin, Friends of the Earth,

Participant reference number 20020152

I am Mike Birkin, South West Campaign Organiser for Friends of the Earth. We are founder members of the Stonehenge Alliance.

I have held this post or equivalent for Friends of the Earth since 1990. From 2000 until 2002 I represented south west environmental bodies and the South West Sustainable Development Round Table on the steering group of the South West Multi Modal study, SWARMMS.

Appendix B to the ExA's Rule 6 letter, "Initial Assessment of Principle Issues", states that: "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 Issues; ... the ExA will conduct all aspects of the Examination with these objectives in mind".

In view of the very recent declaration by parliament of a Climate Emergency, I propose in this submission to place climate front of mind

It seems that little evidence has been submitted on the scheme's impact on carbon emissions. This is probably because its significance is downplayed by the way this examination is framed by the NNNPS. The applicant is able to conclude that because this one scheme will contribute no more than .03% of any carbon budget its climate impact is therefore of no significance.

But of course any element in a programme can be said to be of no significance if that programme is broken down into small enough pieces. It is the cumulative impact of many individual decisions that counts.

When we look at the cumulative impacts of transport investment decisions and transport policy as a whole then the significance becomes very much larger.

Transport is currently the UK's worst performing sector for carbon reduction. Emissions from all other sectors (and the UK as a whole) have fallen since 1990, while total transport emissions have actually increased.

The total transport sector (including aviation and shipping) is now the largest source of emissions in the UK and in 2017 accounted for over a third of total UK greenhouse gas emissions.

The Committee on Climate Change (CCC) reported to Parliament in 2018 that:

"In our fifth carbon budget assessment, the cost-effective path to 2050 required a 2.3% decrease in road transport emissions in 2016; instead they increased by this amount... The continued rise in road transport emissions highlights the urgent need for stronger policies to reduce emissions and moderate growth in demand for travelⁱ."

It's important to note from the above quote that it's not just cleaner vehicles or electric vehicles that are needed – this alone will not bring about the necessary reductions in greenhouse gas emissions, and overall road traffic will need to be reduced too.

Even if all the current and proposed carbon reduction policies were implemented, including those in the Clean Growth Strategy and policies 'at high risk of delivery', the CCC estimate that transport emissions will still exceed carbon budgets by a significant amount over the next 12 years.

Added to this, the current carbon budgets will need to be revised downwards, since they pre-date the Paris Climate Agreement and were based on 80% carbon reduction. The CCC has called this month for net-zero GHG emissions by 2050 (i.e. a 100% reduction from 1990)ⁱⁱ.

Turning to the specifics of the A303 Amesbury – Berwick Down, carbon emissions from this scheme are large and amount to a significant cost. According to Highways England's assessment they have a negative value of £86 million – a substantial amount given that the total calculated benefit of the scheme amounts only to £102 million. Highways England do not quote a range for this figure but examination of the source tables from BEIS shows that it could be 50% higher or lower – up to £129 millionⁱⁱⁱ. Of course a range can be assigned to any of the figures in the top line analysis but in light of our climate emergency and the very rapidly changing scientific and policy context, it is far more likely that we are at present underpricing carbon emissions than that we are overpricing them.

The climate emergency context suggests that the already high negative value attached to this scheme's carbon emissions are far from secure, and could be substantially higher.

Also in the context of the climate emergency, I'd like to draw attention to the positions taken by local authorities.

From my experience in SWARMMS I know of the long-standing love affair between major SW authorities and the A303 – 358 corridor. Looking at the representations you have received, support for this scheme and for the corridor dualling as a whole has been expressed individually by Wiltshire, Somerset County and Devon County Councils, and support has also been expressed by a partnership which embraces Dorset County Council too.

It is however to be noted that Wiltshire, Devon and Somerset councils all passed motions declaring a climate emergency in February this year and Dorset have done the same within the last week. So we call on this examination and on those individual authorities to reconsider whether their positions on this scheme are consistent with the wider, and far more demanding, context of the Climate Emergency.

So this is the background then: failing transport policy and a growing climate emergency that is recognised by the public and at all political levels.

The A303 dualling, and the Stonehenge Tunnel especially, is a high profile, high cost, high carbon project. The decisions that need to be taken on them are among the most significant transport investment decisions over the next few years. I would urge you to consider in your deliberations that the implications for climate policy are of far greater significance than just .03 % of a carbon budget.

ⁱ [Reducing UK emissions – 2018 Progress Report to Parliament.](#)

ⁱⁱ <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/>

ⁱⁱⁱ [Data Tables Supporting the toolkit and the guidance, 2017, Table 3](#)