

**From:** [REDACTED]  
**To:** [A303 Stonehenge](#)  
**Subject:** Stonehenge Redetermination  
**Date:** 04 April 2022 21:11:20  
**Attachments:** [stonehenge 2022 consultn response.1.pdf](#)

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Please find attached my views on the NH responses to the SoS redetermination of the Stonehenge scheme

Regards

Chris Gillham

[REDACTED]



4<sup>th</sup> April 2022

[A303Stonehenge@highwaysengland.co.uk](mailto:A303Stonehenge@highwaysengland.co.uk)

Dear Sir/Madam

**A303 Stonehenge Proposals  
Redetermination**

4<sup>th</sup> April 2022

Report from the IPCC on likelihood of 3.2C temperature rise with present commitments.

Deadline day for responses to a plan to add even more carbon emissions to the UK transport total.

***Some government and business leaders are saying one thing - but doing another. Simply put, they are lying. And the results will be catastrophic.***

UN Secretary General Antonio Guterres

As we all, yet again, have to respond to a consultation on this Philistine proposal, it is near impossible to find any grounds for argument when confronted with National Highways' grotesque Putinesque distortions of truth. Black is white with NH, the Climate Crisis is a myth, carbon emission is not the sum of all carbon emissions, even though all the science says it is, alternatives to carbon emission can only be different carbon emission, carbon emissions from growing traffic can only be decreased by growing traffic.

The High Court decision made it clear that alternatives to this scheme should have been considered. Alternatives to National Highways appears to mean slight variations – a kind of perverted perturbation theory. This has always been the way with NH – choose from amongst the grey route, the blue route, the red route etc. Never discuss real alternatives. ***This is the problem with a Department of Transport that doesn't do transport thinking at all.***

**Transport Thinking in Boxes:** If you start from the premise that transport is road building and public transport and confine it to those areas as non-overlapping closed boxes and then chuck money at the two (for some bizarre reason<sup>1</sup> grotesquely skewed towards roads: ~£11.7B per annum<sup>2</sup>, with £3.9B p.a. on public transport, and only as much as this due to COVID,

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<sup>1</sup> Especially bizarre when it has long been recognised that road transport externalises costs to the tune of three or more times the total tax and duty take on the activity.



normally about £2.4B<sup>3</sup>), without ever considering what the transport need is, then it is hardly surprising that thinking never goes outside the box. Highways England exists, like a cancer or a virus, only to serve its own propagation. Central government keeps feeding it without ever considering what the nation gets out of it, or whether it could get something very different if it spent money on different things.

The whole appraisal methodology of road building (Webtag) is flawed in all its basic assumptions<sup>4</sup>, the DfT never having researched any basis for them. It has never shown an overall benefit to the economy from road building, that justifies making it cheaper for road journeys to be made; in its childishly illogical understanding of correlation it has never demonstrated that GDP growth follows from road building rather than the other way round; it has never shown why ‘willingness to pay’ is an appropriate basis for cost-benefit analysis, when externalities mean that it is not the user of roads that pays the price of their use; it has never researched the relative economic benefits to the UK of investment in public transport compared with the support for private motoring; it has never countered the Metz<sup>5</sup> research that destroys its fundamental premise of the valuation of time being an objective cost function to minimise; it has always asserted (as it does particularly with the A303) an economic benefit of building road capacity to peripheral regions without ever researching which way round the economy flows; it has never considered that there has to be an optimal level of road infrastructure, let alone done any research to see which side of the optimum we are actually on.

Instead, it constructs an elaborate, pseudo-scientific framework of Webtag around all these false assumptions and claims this as justification of economic benefit. It is priestcraft, snake-oil, Wizard of Oz stuff. Of course it fools the politicians who mostly can’t even do the most elementary statistics<sup>6</sup>. But is there really no-one in the Department of Transport with the intelligence and intellectual integrity to ask the question about why we spend tens of billions on a National Highways agency that propagates such dishonest guff?

**Alternatives: Redetermination 1.1:** The Applicant’s response to the Secretary of State is confined entirely to road building options. *The Secretary of State is supposedly responsible for Transport, not just road transport.* Alternatives to a transport scheme with transport objectives ought obviously to include non-road-building alternatives.

The fundamentally flawed thinking about the dynamics within the road-building box cannot even sensibly have any significance in comparing one scheme with another with a perturbation calculation. If, as seems likely (footnote<sup>4</sup>), the net effect of road building on the country’s economy is detrimental, then it is not sensible to do more of it – an increased positive Webtag COBA result signifies an increased cost to the economy. Even if this were not the case, what we do not have is any way of sensibly comparing a road scheme with a public transport scheme (either infrastructure or service intervention).

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<sup>3</sup> [REDACTED]

<sup>4</sup> See P Kinnersly; World Transport Policy and Practice; 20.2/3; May 2014; p75 et seq.

<sup>5</sup> D Metz: The Myth of Travel Time Saving; Transport Reviews, 28; 2008; pp. 706-709.

<sup>6</sup> [REDACTED]

There was a time when relatively sane government made some attempt at transport thinking and actually looked at transport problems from a multi-modal perspective. This particular corridor was examined by the SWARMMS process in 2002<sup>7</sup>. It was not hugely enlightened in transport thinking (it made no reference at all to the existential threat of climate change, even though it was 10 years after Rio) but it did make attempts to talk about meeting a corridor transport demand rather than a road demand. All that has gone. The road builders are nicely bunkered down in their cosy and hugely funded box of road thinking, entirely oblivious of the realities outside and the burning planet.

In this real world of environmental and social limits, it is not sane to talk about improving the efficiency with which we do the wrong things. This is what lies behind the fatuity of the Department for Transport's so-called Decarbonisation Plan, which is one with the Government's general propagation of a new and more dangerous species of Climate Change Denial. It is no longer that man-made climate change does not exist (though there clearly is still a strong streak of this Lawsonian insanity in Westminster, if we are to judge by the antics of the *Net Zero Scrutiny Group*) but that we don't have to do anything about it because technology will magically allow us to carry on '*Business as Usual*'. Never mind that decoupling of unconstrained economic 'growth' from environmental damage has never happened yet<sup>8</sup>. Never mind that technological improvement of efficiency (important though it always is to make desirable systems more efficient) is not enough to bring about social or environmental benefit. Never mind that the Jevons Paradox (rebound) predicts unwanted results from simple-minded technological efficiency considerations, that don't look at wider interactions and other matters of importance.

This is why the concentration on electric vehicles is so misplaced. Clearly there are efficiencies to EVs over ICE vehicles (though not the pollution advantages that are generally claimed) and we would expect that any vehicles used in any sustainable transport future would likely be electric or hydrogen. But that is not the point about sustainability – we urgently need to look at how society conducts itself most sustainably. The obvious logical first response to the profligate use of fossil energy in transport (the worst emissions offender in the UK) would be to reduce what we do. Do we really need to travel so much? How much are we addicted to pointless travel?

When looking at transport emissions and comparing them with all other sectors of economic and social activity, it is obvious at once that transport is the most discretionary area. We do not need to make all the journeys we do, in the same way that we need to heat our homes our schools and hospitals, fuel our agricultural processes and drive the industrial processes that construct the tools and facilities for sustainable living. We may think all our car journeys and road freight movements are necessary, but that is only because the DfT and NH have so distorted the economics of transport by encouraging the growth of the externalities and obscuring the perception of the true costs of roads. What the Metz results mean is that the same economic activity is merely spread out further – shops move from villages to towns, from

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<sup>7</sup> Government Office for the South West: London to South West and South Wales Multi Modal Study; May 2002

<sup>8</sup> See Myth of Decoupling: *Prosperity Without Growth: Foundations for the Economy of Tomorrow*; Tim Jackson; Routledge, 2017

towns to motorway-based hypermarkets; facilities like hospitals, offices and schools move further away from the people they serve.

Because transport, as it has become so distorted, is still the most discretionary economic activity, it is clear that it should not have priority access to what renewable energy becomes available. The DfT's 'Decarbonisation Plan' implicitly, arrogantly indeed, asserts some privileged use of renewable electricity to keep funding the car habit. With the most optimistic likely trajectory of renewable energy development, there will not be anywhere near enough to feed the DfT's projections of EV or hydrogen use for transport, without compromising the reduction in emissions needed for the more socially useful activities in society.

The second logical response (after reduction of unnecessary travel) to the profligacies of fossil fuel use in transport is to look for efficiencies of behaviour, rather than looking for a technological tweaking of the existing inefficient transport disposition in which billions of individual journeys are made simply because users do not pay the costs of them. The obvious efficiencies of transport lie in scaling of things – bulk transport of goods by rail and water (roads being only used for last-mile movement, something that modern computer operational processes can easily facilitate) and reliable public transport. The realisation of these obvious alternatives is a matter of undistorting the current subsidy arrangements. Road freight should pay its real costs – it is a lasting disgrace that it does not do so and goes back to the corruption of office that existed in the DfT at the time of the Peeler Memorandum<sup>9</sup>, where civil servants thought it was their business to arrange inquiries to bring about advantages to commercial road freight companies (has this changed, do we think?). If the DfT put into public transport anything like the subsidy that private motoring receives, the UK would have an enviable reputation for civilised transport policy. Instead the DfT presides over an increasingly regressive system, in which the poorest pay dearly for one of the least impressive public transport systems in Europe.

**Carbon: Redetermination 1.3:** The response to this question is of breath-taking imbecility even for those familiar with National Highways' reputation for insensitivity and indifference to truth. This is no reply at all; it is a regurgitation of the previous nonsense, without any apparent awareness of how the world has changed, all the dire warnings about our behaviour and all the advice from science. Even taking account of its huge reliance on the DfT's incoherent Decarbonisation Plan and all the magic technological bullets that the Prime Minister thinks absolve us from any responsibility for action, National Highways' dismissal of the effect of its schemes as straws on the camel's back must surely rank as one of the most stupid utterances of any government agency in living memory.

National Highways persists in the irrationality of asserting that small additions to carbon levels are of no account (ignoring incidentally that none of its emissions either through construction of schemes or through the generation of traffic that results from them is in any sense small – emissions just from the RIS2 construction programme between 2020 and 2032 amount to over

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<sup>9</sup> *A Proposed Inquiry into Heavier Lorries*: memorandum from Mr Joseph Peeler (Freight Directorate) to Mr Peter Lazarus, Department of Transport; 1978.

20MTCO<sub>2</sub>E<sup>10</sup>, about the same as the total emissions over all sectors of Malawi's economy during that period, a country of about a quarter of the UK population). On the basis of National Highways 'thinking' we can in fact ignore all the emissions of 58 of the world's nations.

The grotesque irrationality might just be put down to the numerical incompetence and scientific illiteracy of the people who develop policy in National Highways, who somehow have not understood that the problem of decarbonisation is not about imagining a target date for having a certain level of emissions (though NH does not concern itself about even this) but about how we get there – borrowing from Bill Clinton's strategist '*it is cumulative carbon, stupid*'. It is in fact something far more dishonest. NH very well understand the power of accumulation of small things; it has been playing on such things for decades; it is the very basis of Webtag cost/benefit analysis, where billions of supposed little time savings can be aggregated to some gigantic sum of supposed economic benefit. The difference is that those little time savings are not real (Metz again) whereas the sum of carbon is real and that is what is destroying our children's future.

But just to see how dishonest this is, let us look further at the Stonehenge scheme. Even if we accept for one moment the bizarre fiction of the Contingency Evaluation (dismissed by the EIP and UNESCO) and that the construction cost does not exceed the currently supposed figure, then the return on the huge 'investment' in this scheme is about £14M p.a. Transport Action Network<sup>11</sup> makes the calculation that, as a proportion of national GDP, this is an order of magnitude less than the proportion of cumulative carbon emitted by the scheme to the 5<sup>th</sup> Carbon Budget for all UK emissions. NH understands this perfectly well of course, but it persists in its 'accountancy scams'. But:

*Climate does not respond to:*

- *Good intentions*
- *Machiavellian politics*
- *Eloquent arguments*
- *Legal niceties*
- *Accountancy scams*

*.....All are trumped by the brutal beauty of physics.*

Prof Kevin Anderson, Manchester University.

All the usual metaphors about unjustified insouciance in the face of disaster, like '*moving the deckchairs on the Titanic*' seem woefully inadequate to describe just how irresponsible National Highways is in respect of the actual, explicit threat to the existence of life on Earth. There may not be any actual icebergs left in the future, but in effect NH is not just sunning itself in the deckchairs, but it has actively taken over the wheel of the Titanic and is steering directly towards the iceberg that will sink it.

The 2019 IPCC SR1.5 report said what a +1.5C future would mean:

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<sup>10</sup> *The carbon impact of the national roads programme*; L Sloman and L Hopkinson; July 2020

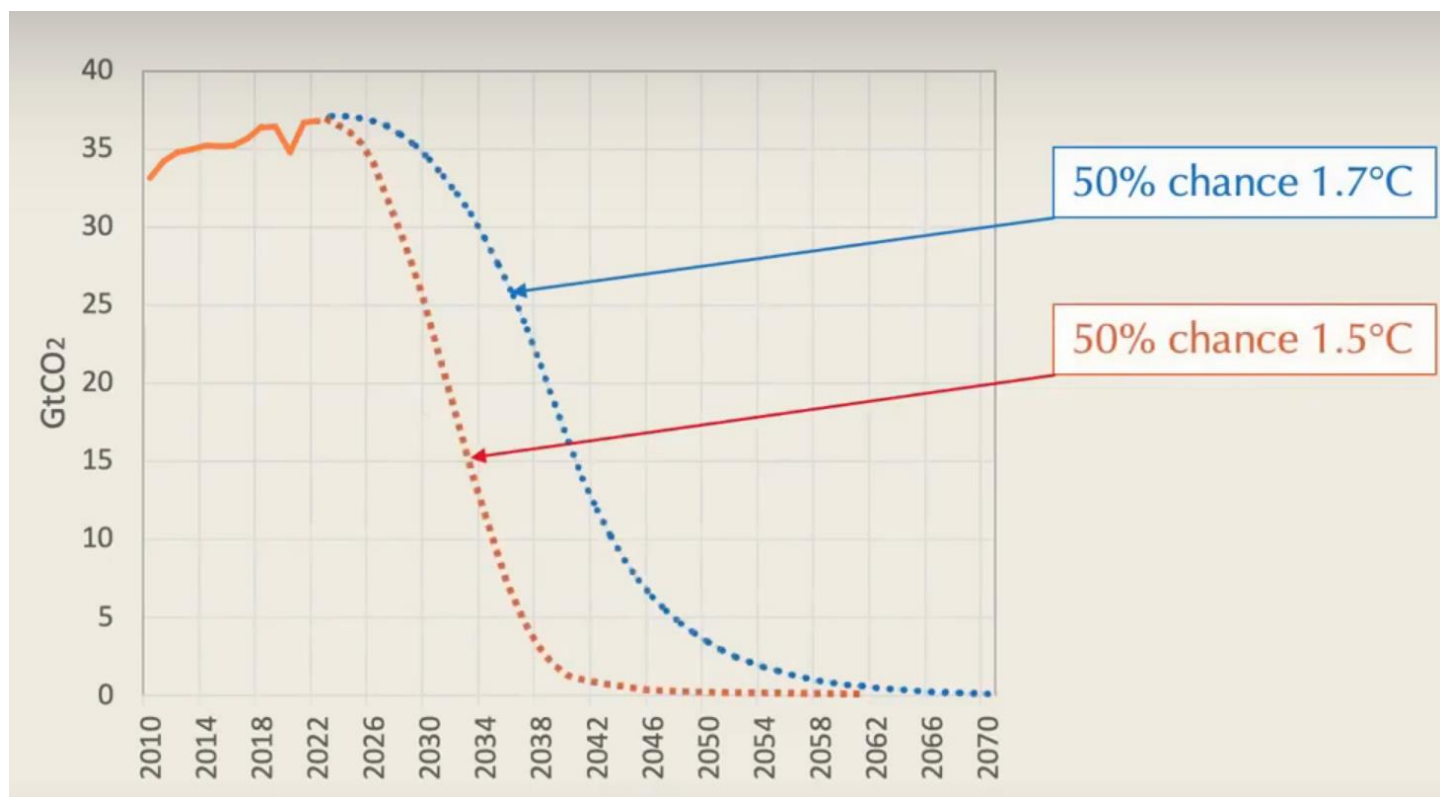
<sup>11</sup> [REDACTED]

*The impacts of even 1.5C are severe across ecosystems, human systems, physical infrastructure and agriculture.....more floods, more droughts, more extinctions and more human migration*

Impacts at 2C will be much worse. Sir Patrick Vallance, UK Chief Scientific Adviser, proclaimed at COP26 that: *'1.5 is not a negotiable thing'*. Today IPCC predicts that present commitments (and who believes such commitments? Certainly nobody would sensibly believe the UK's commitment, in the light of the way the Treasury and the DfT are behaving) mean 3.2C – a world with huge desertification, hunger and likely wars for dwindling resources of food and liveable land.

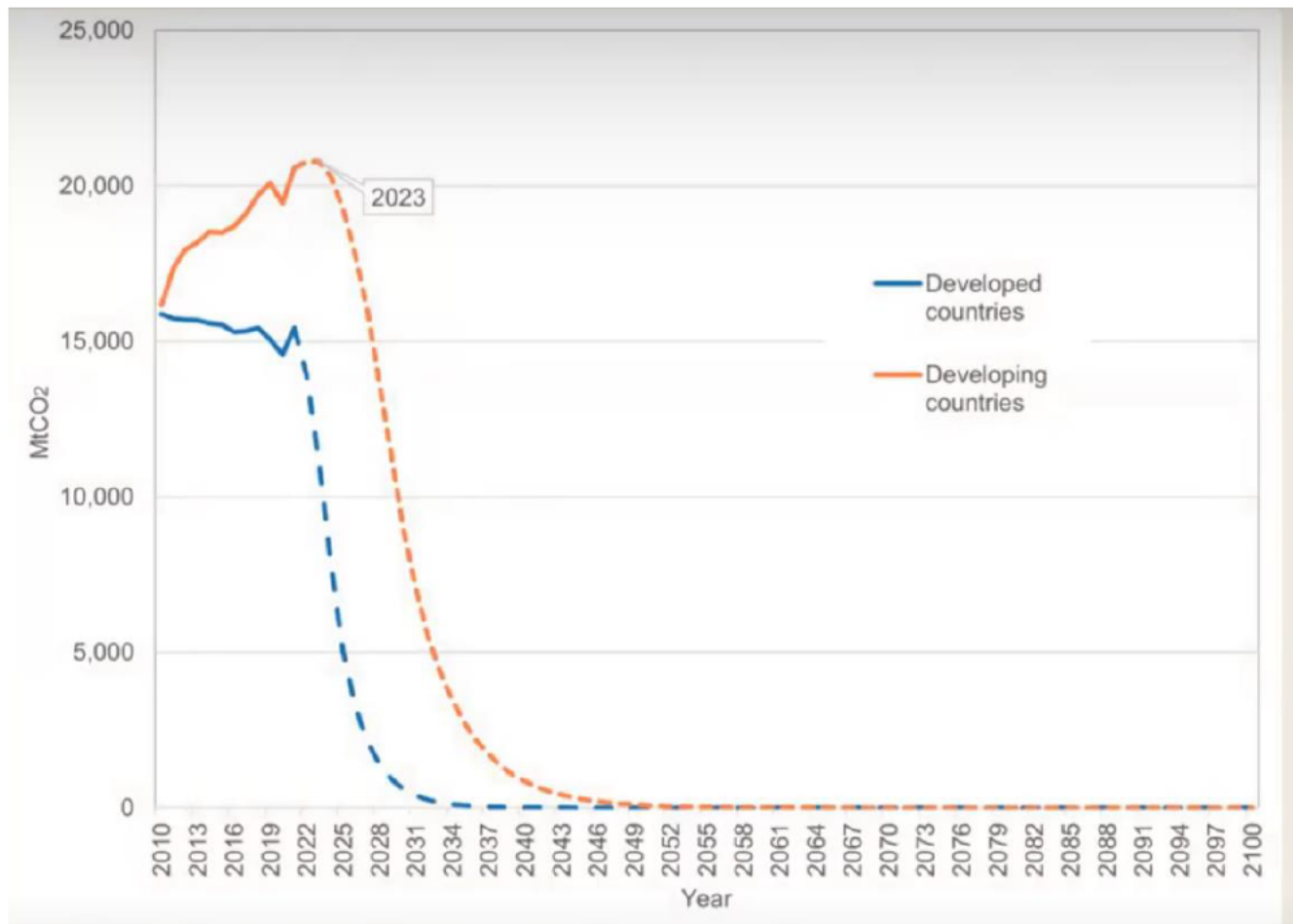
To stand just a 50% chance of doing no worse than the hugely damaging 1.5C the total remaining new emissions of carbon are about 420GT. At current rate of emission this will have been exceeded in just 10 years! What is going on in the heads of the people working for National Highways that they think we should gaily go ahead for the next 30 years encouraging more and more emission? Are they mad? Do they think this will affect everyone else except themselves? Do they have no children?

Can't they just look at the ██████ data?



This is the global curve that still leads to huge problems. We have to halve emissions by 2030. But worse than that, the thing has to be done as equitably as possible, which means that the western world (and especially the UK), that has benefitted from all the fossil fuel burned until now, cannot justify the burden of this necessary curve being dumped on the poor and exploited nations of the world. If we look at the trajectory that goes at least part way towards equitable

sharing of the burden we see that **developed countries should halve their present emissions by the end of next year!**



Putin's war has illustrated the debilitating effects of our oil and gas addiction. We continue to fund his war and its atrocities because we haven't got the willpower to stop. Worse than this we have a Chancellor of the Exchequer who actually boasts about putting public money into feeding this addiction.

If we had a sane Department of Transport, it would be telling National Highways that it was its job to manage a rapid decline of use of the road system. If we had a sane Government, it would be telling the Department of Transport that it needed to develop a transport policy that had some regard for the future. The Secretary of State does not need to 'Redetermine' the Stonehenge scheme, he needs to redetermine what transport should be about in a burning world.

Yours faithfully

Christopher Gillham