

Dear Planning Inspectorate,

I have made comments in the past on this road scheme. I will not make a long response. I have identified problems with several of the responses of National Highways on the Bullet Point headings, but I know these are being addressed by experts in each area. Here I do want to re-emphasise the extent to which this scheme remains unacceptably damaging. In particular the number of grounds for refusal is in my view increasing as each year goes by. On three key areas, carbon, alternatives and archaeological impacts, the changing world is leaving such a poor project ever further behind. I will not comment on the economic case, as others have made clear how very weak this is, resting on the quicksand of an inadequate “heritage value” calculation. Surely the levelling up agenda makes throwing so much money at so few miles in this region even less sustainable for the state finances.

Carbon

The Secretary of State in seeking to approve the scheme, against the fully considered advice of the Panel, appears to have lent heavily on the general tenor of the National Networks NPS. He interpreted this as allowing him to disregard any sensible consideration of carbon effects. The claims by National Highways in their Response to Bullet Point Three ring ever more hollow, that such a road scheme has no significant effects – simply because it is one relatively limited scheme, which must not be considered systemically, in cumulated and systemic carbon impacts. This was always in my view a mistaken approach, even if supported to an extent by the 2014 NPS. But now that government policy has now changed so strongly, and the NPS is being revised, with a major aim being to update it to meet current net zero policy, it becomes even more mistaken.

Alternatives

Another ground which the Secretary of State seems to be depending on, and as National Highways argue (and have always argued), is that alternatives to this road scheme, and in fact to the whole A303 widening package, had been fully considered. Anyone who has been watching British transport policy closely over the last 20 to 30 years finds this an implausible claim. Alternative road schemes in the local region may indeed have been considered to some extent, though even this stage was done quite early on in the justification process and without considering seriously the reasonable conclusion that *no* road scheme comes out as suitable for progression, even only considering road options. But there has never been any evidence of serious consideration of reducing the amount of road traffic using this corridor over the relevant period – which should be similar to the net zero timescales, the next two to three decades.

A sustained attempt to move an important proportion of the leisure, commuting and freight traffic from road use to other modes would have every chance of being successful over such a timescale. This can quite likely benefit from the recently developing changes in travel and working behaviour, which may well reduce the commuting element in any case (including some increase in working at home). All this needs to be reconsidered by both the Secretary of State and National Highways, virtually from scratch, to see how real progress can be made

