

10th June 2022

Kevin O'Hanlon
Transport Infrastructure Planning Unit
Department for Transport
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33 Horseferry Road
London
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Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire
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Your ref: TR010025 AFP022
Our ref: SoM Response Letter
10.06.22

Dear Mr O'Hanlon

**Planning Act 2008 (as amended and the Infrastructure Planning (Examination Procedure Rules 2010 – the A303 (Amesbury to Berwick Down) Development Consent Order
Request for Comments from All Interested Parties**

Thank you for your letter dated 29th April 2022 inviting comment from all Interested Parties on the National Highways update to Section 4 of their response to the Statement of Matters on carbon.

Wiltshire Council has reviewed the National Highways submission. Whilst it is accepted that the Government has set the carbon budgets at a national level, the Department for Transport's Transport Decarbonisation Plan (2021) requires Local Transport Authorities to make quantifiable carbon reductions a fundamental part of local transport planning. The Local Transport Plans will be required to set out how local areas will deliver ambitious quantifiable carbon reductions in transport. Furthermore, Baroness Vere has stated that "...local authorities have a crucial role to play in so many areas of the decarbonisation agenda and this is why local transport plans will now need to set out how quantifiable carbon reductions will be achieved in local areas, with future transport funding dependent on these plans being robust, ambitious and achievable".

The Department of Transport are in the process of developing the new Local Transport Plan guidance and the technical guidance for quantifiable carbon reductions. A public consultation on the emerging guidance is expected to be held in the summer 2022 with the guidance published in autumn 2022. The target date for the updated Local Transport Plans to be in place is spring 2024 with the future funding condition due to be phased in in 2025/26.

Until this guidance is available, the exact extent of the requirements on Local Authorities is unknown, however it is assumed that it will be necessary to estimate the current baseline for transport emissions in the local authority area and calculate how transport emissions are expected to change over time without any specific interventions. The estimated reduction in carbon emissions to be achieved through the Local Transport Plan will then

need to be calculated, which is likely to be required to be supported by robust evidence as to how these expected reductions have been derived.

Wiltshire Council noted in its April 2022 response to the Statement of Matters that the increases in carbon and passenger mileage associated with the A303 Stonehenge scheme would need to be offset with additional demand reduction measures elsewhere and be planned for in the Council's Local Transport Plan and Climate Delivery Pathways. It is recognised that National Highways would not have had sight of the two requests for information contained within the Council's response due to both submissions being submitted on the same day. The Council would therefore like to take this opportunity to reiterate its request that the increase in emissions as a percentage of the county target for transport decarbonisation along the High Ambition Pathway (25% reduction in passenger miles travelled per person) at 2030 and 2045 be calculated. The actual and percentage increase in passenger miles between now and 2030 and 2045 should also be calculated, since these will need to be offset by measures to reduce passenger miles elsewhere.

Wiltshire Council would welcome the opportunity to work with National Highways to better understand the localised carbon impacts of the A303 Stonehenge scheme so that it can develop robust climate reduction pathways to achieve its own climate reduction targets and continue to receive funding from the Department of Transport for transport schemes which will deliver the Council's local objectives to benefit Wiltshire's residents and communities.

I trust that the information in the attached is helpful for the Secretary of State when considering the re-determination of the Application. However, if you require any further information, please do not hesitate to contact me.

Yours sincerely,



Parvis Khansari
Corporate Director – Place

