

From: [REDACTED]
To: [A303 Stonehenge](#)
Subject: Response to request for comments on updated information from National Highways regarding A303 Stonehenge
Date: 11 June 2022 06:17:27

Dear Mr O'Hanlon

Response to request for comments on updated information from National Highways regarding A303 Stonehenge

Thank you for inviting me to comment on the updated Environmental Information provided in support of the A303 Stonehenge tunnel scheme.

As a registered interested party for the "A303 Stonehenge" application, I ask that the following comments be forwarded to the Secretary of State for Transport:-

Having examined the updated Environmental Information, I have to say how disappointed I was that the government - especially in the current context (ie climate emergency and cost-of-living crisis) - thought it wise to continue to pursue this scheme, which is flawed on so many levels!

Nevertheless, if the scheme is to go ahead, I strongly believe that significant changes are needed:

- a) to safeguard the WHS, as well as the Grade 1 listed Amesbury Abbey together with its park and gardens, for generations to come
- b) to protect Special Areas of Conservation and wildlife - especially rare birds like the stone curlew in the nearby RSPB reserve
- c) to comply with UNESCO advice and our World Heritage Convention obligations, and avoid damaging our reputation on the world stage for heritage protection
- d) to meet the UK planning policy requirement to protect the WHS and its setting

To be clear, if the scheme is to go ahead, I believe that [a WHS bypass via a longer tunnel must be considered](#).

But on the specific point about environmental impact:

Firstly, I would like to draw your attention to the law and the many declarations and promises that successive UK governments have made to the British people, and indeed the world, on it's commitment to tackle climate change:-

In 2008, carbon budgets were introduced in the UK under the Climate Change Act. Each carbon budget provides a five-year, statutory cap on total greenhouse gas emissions, which should not be exceeded, in order to meet the UK's emission reduction commitments and, taken together, they define a cost-effective path towards the UK long-term

climate objective. In 2008, the target was to cut greenhouse gas emissions by at least 80% by 2050, relative to 1990.

In 2015 the government committed to the Paris Agreement's long-term temperature goal of keeping the rise in mean global temperature to well below 2 °C above pre-industrial levels, and preferably limit the increase to 1.5 °C, recognizing that this would substantially reduce the effects of climate change.

In 2019 the government declared an **environment and climate emergency** and set a target of 'net zero' emissions by 2050. The sixth carbon budget (which National Highways has apparently so far ignored) reflects this updated target.

In 2020 the government accepted the independent Committee on Climate Change (CCC) recommendations to set a Nationally Determined Contribution (NDC) of reducing emission by at least 68% (excluding International Aviation and Shipping emissions) by 2030.

In 2021 the government increased this to 78% by 2035 (<https://www.gov.uk/government/news/uk-enshrines-new-target-in-law-to-slash-emissions-by-78-by-2035>)

Also in 2021 the government published a Transport Decarbonisation Plan which sadly is no where near detailed or ambitious enough to keep us on the the Sixth Carbon Budget trajectory or to meet the Paris Agreement.

The fourth and fifth carbon budgets are those which would apply during the proposed construction, and the sixth carbon budget (which National Highways has apparently so far ignored) is the CCC's trajectory through the 2030s - which is also the earliest that any Stonehenge tunnel is likely to come into use. Although the first and second carbon budgets were met, and the UK WAS on track to meet the third, it is NOT currently on track to meet the fourth or fifth budgets.

So, basically, the current government has squandered any advantages of tackling the climate emergency that had previously been amassed, and their actions - especially with respect to transport - are currently making a mockery of the above climate related declarations.

Even the CCC says, "Delayed plans on surface transport .. must be delivered"

DfT say, "Decarbonising transport is one of our main priorities and roads will continue to play a huge role in that, facilitating cyclists, buses and electric vehicles as we work towards banning the sale of petrol and diesel cars by 2030."

But all of these good words and declarations are not enough! They need to be matched with urgent and meaningful action.

Minimising the impact on the environment is supposed to be a key priority for government and National Highways. But tunnels, by their very nature, require massive volumes of concrete and therefore come with a massive carbon footprint.

If the government is serious about tackling climate change, it can't keep ignoring the emissions that road building as well as steadily increasing Internal Combustion Engine (ICE) vehicle usage are causing.

For example, I understand that previous CO2 estimates provided for usage on the proposed new scheme have been reduced in anticipation of increased EV uptake. But forecasts can't only be based on anticipated EV uptake. Forecasting environmental impact is extremely complex and needs to take account of many factors, including the following:

- the continued sale of HGVs powered by polluting ICEs after 2030;
- the steadily increasing number of polluting ICE vehicles on our roads up until 2030 because of inadequate public transport;
- the average life of a car is 12 years therefore, unless there is a massive expansion in public transport, millions of polluting ICE cars and vans (as well as polluting HGVs) will remain on our roads after 2030;
- most people are not going to be able to afford to replace polluting ICE vehicles with EVs - therefore after the ban, unless there is a massive expansion in public transport, we can expect more ageing and increasingly polluting ICE cars and vans to remain in use for much longer than the 12 year average;
- the CO2 generated during the manufacture of ICE and EVs - which could be massively reduced if public transport were improved.

But page 13 of National Highways 16 page report here ...

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010025/TR010025-003359-National%20Highways%202.pdf> ... suggests that none of these factors have been

taken into account.

In fact, on the same page, National Highways admits that their figures are out of date!

eg - "The 6th Carbon Budget was not published at the time the ES was produced. Therefore, emissions were not presented against the 6th Carbon Budget in the ES."

The 6th Carbon Budget was published 9 December 2020. If this has not been taken into consideration, the latest Environmental Information must be considered to be **inadequate** - and certainly not as 'watertight' as we were lead to expect.

Spending the same billions on improving our existing roads to make them safer for walkers and cyclists and improving public transport - especially trains to the South West - would reduce congestion and therefore largely eliminate the need to increase road capacity.

Spending more on improving broadband would also take cars off the road by improving employees' ability to work from home.

Personally, I believe that this would be more cost effective and have more longer term benefits for all.

Furthermore, I understand such measures also meet the stated wish of the Secretary of State for Transport who has called for more people to switch away from their cars.

Plus it is anticipated that, in a few decades, the proposed 4-lane expressway would be obsolete anyway!

So, why spend billions of public money during a cost-of-living crisis, massively increasing CO2 levels during a climate crisis, and on a new road which has no sound economic case, when the existing traffic problems could be resolved at far less expense and without irreparable archaeological damage to a such a valuable national and global asset?

Please also note that when documentation, such as that provided by National Highways, is of such poor quality - eg lacking a full, accurate, up-to-date environmental assessment - it causes further unnecessary mistrust ... on top of the anxiety that such poorly considered schemes create. I therefore respectfully suggest that all documentation provided by the Planning Inspectorate - especially from National Highways - must meet much higher standards, which would also avoid wasting so much public money on so many unnecessary consultations.

Yours sincerely

Sonia Davey (Ms)

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