

From: [REDACTED]
To: [A303 Stonehenge](#)
Subject: Comments on responses from National Highways to the Final Report on the joint World Heritage Centre (A303 Stonehenge)
Date: 27 September 2022 11:22:30

Dear Mr O'Hanlon

Comments on responses from National Highways to the Final Report on the joint World Heritage Centre (A303 Stonehenge)

Thank you for inviting me to comment on National Highways responses to the Final Report on the joint World Heritage Centre.

As a registered interested party for the A303 Amesbury to Berwick Down/A303 Stonehenge application, I ask that the following comments be forwarded to the Secretary of State for Transport, the Rt Hon Anne-Marie Trevelyan MP:-

Dear Ms Trevelyan

It was extremely disappointing to learn that the latest government also think it wise to pursue a flawed proposal, with no sound economic case, that is based on out-of-date DfT Road Traffic Forecasts, when the existing traffic problems could be resolved at far less expense and without irreparable archaeological damage to a such a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 - especially given the climate crisis, biodiversity crisis, cost-of-living crisis, and the apparent shortage of funding, labour and materials preventing the proper upkeep of existing highways!

As a citizen who is particularly concerned about the environment, I feel it is important to reiterate the law and the many declarations and promises that successive UK governments have made to the British people and the world in order 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 is still apparently ignoring) 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 is still ignoring) 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**"

[REDACTED]
[REDACTED]. In 2022, the CCC continues on the topic of 'sustainable transport' saying that this, "should recognise the role that place-shaping, **active travel, public transport,** and shared mobility can combine to play in reducing car dependence and realising a range of co-benefits. **These factors should be required to be considered from the outset of all development planning.**" [REDACTED]
[REDACTED])

According to National Highways, the proposed tunnel is intended to reduce congestion and delays. Yet, as per this article by Greg Marsden, Professor in Transport Governance at the Institute for Transport Studies, University of Leeds, dated 30 May 2022, about

[REDACTED]
[REDACTED] - "research suggests that we might need to **reduce how much we travel by car by AT LEAST 20% in the next decade.**"

In terms of meeting legal Net Zero commitments, both laymen and experts believe that government and National Highways are not focusing sufficiently on enabling and encouraging modal shift. For example, this response from Transport Planning Society's researchers to the proposed third Road Investment Strategy (RIS3) - [REDACTED]
[REDACTED] - "Throughout the report there is too strong a focus on alternative fuels (biofuels, electricity and hydrogen) rather than increasing modal shift. **For the government and National Highways to reach their respective net zero targets by 2050, a significant reduction in total car mileage is required (it has been estimated that a 20% to 30% reduction is needed by 2030,** relative to 2019 levels), with the additional potential benefit of also freeing up road-space to other users."

I strongly believe that if the DfT Road Traffic Forecasts being used today were up-to-date AND RIS3 enabled and encouraged appropriate reductions in travel by car - which are effectively legally required now in order to satisfy statutory Net Zero commitments - then the proposed tunnel would not be deemed wise or even

necessary.

Nevertheless, if the scheme is to go ahead, 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, I believe that a longer tunnel or southern by-pass must be given proper consideration.

But on the specific request for comments on National Highways latest responses:

I have read the 2022 report of the Advisory Mission

[REDACTED] and agree that, "the construction of dual carriageway in cuttings at either end of the tunnel would adversely and irreversibly impact on the integrity of the WHS, through removal of archaeological features and deposits, through disrupting the spatial and visual links between monuments, and as a result of its overall visual impact."

I also agree with the Mission advice to - at the very least - extend the underground section of the Scheme to the western boundary of the WHS.

And, in the event that some kind of intervention is considered necessary, I also believe that the public would be willing to pay more "to remove the impact [on the WHS] completely through longer tunnel options or complete by-passing."

Having examined National Highways latest responses, I see that they continue to rule out these options.

In fact, National Highways simply reiterates old arguments justifying their scheme which is not only unacceptable to me and UNESCO's World Heritage Committee, but to the Government's independent specialist examiners, and even the former Transport Secretary who agreed with the examining panel that the scheme would be "significantly adverse" overall!

In July 2021, the High Court quashed the DCO in part because the SoS did not properly take alternatives into account - particularly an alternative that would have lengthened the tunnel so its western portal was outside the World Heritage Site. And, as far as I can tell, such alternatives have *still* not been properly taken into account. Plus, now, much of the data that the proposal is based upon is even more out-of-date!

In summary, **National Highways' latest responses fail to alleviate any of my concerns**

and I therefore continue to object to the proposals and hope that they will be abandoned.

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 eliminate the need to increase road capacity; and spending more on improving broadband would also take cars off the road by improving employees' ability to work from home; all of which would help to meet statutory Net Zero commitments.

However, should the Transport Secretary intend to proceed with the scheme, I trust that it will be subjected to another formal Public Examination so that all of the new information submitted by National Highways and others since 2020 may be fully and openly discussed, and taken into account and advised upon by the Government's independent Planning Inspectorate.

Yours sincerely

Sonia Davey

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