

**A30 Chiverton to Carland Cross
TR010026**

**8.28 RESPONSE TO FURTHER
INFORMATION REQUESTED BY THE
EXAMINING AUTHORITY ON 22 JULY
2019**

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1 Introduction

1.1 Purpose of this document

- 1.1.1 Highways England received a letter from the Examining Authority on 22 July 2019 to request information under Rule 17 of the Planning Act 2008, relating to procedural decisions, request for further information and change to the timetable. The Highways England response to relevant sections of the Rule 17 letter is set out in **Table 2-1** overleaf.

2 Responses to the Examining Authority's Request for Further Information

Table 2-1 Applicant's Response to the Examining Authority's Request for Further Information

Number	Directed to	Question	Applicant's Response
4.0.1	Applicant	<p>The Climate Change Act 2008 (2050 Target Amendment) Order 20191</p> <p>Paragraph 5.16 of the National Policy Statement for National Networks refers to the legally binding framework to cut greenhouse gas emissions by at least 80% by 2050. The above Order commenced on 26 June 2019 and amended the net UK carbon account for the year 2050 to be at least 100% lower than the 1990 baseline.</p> <p>In light of the above Order please confirm what changes may be required in relation to Environmental Statement Chapter 14, Climate Change [APP-067].</p>	<p>Highways England consider that the revised carbon reduction target does not alter the assessment of the Scheme as set out in Chapter 14 Climate Change of the Environmental Statement (Document Reference 6.2) [APP-067].</p> <p>In June 2019 Government laid in Parliament The Climate Change Act 2008 (2050 Target Amendment) Order 2019, an amendment to the Climate Change Act 2008. This amendment revises the current 2050 carbon target of an 80% reduction of greenhouse gas emissions compared to 1990 levels, to an increased target of 100% reduction compared to 1990 levels.</p> <p>The assessment in Chapter 14 Climate Change of the Environmental Statement (Document Reference 6.2) [APP-067] concludes that the scheme results in a net reduction of whole life carbon emissions when set against the baseline position (Do Minimum Scenario). Further, as shown in the table below, extracted from Table 14-12 in Chapter 14 Climate Change of the Environmental Statement (Document Reference 6.2) [APP-067], net carbon emissions from the scheme as a percentage of the Governments current national carbon budgets are small and in the later phases of the scheme negative. An extract of Table 14-12: Comparison of predicted carbon emissions relative to UK carbon budgets is provided at Appendix A of this document.</p> <p>This position is further framed by the current policy guidance on the matter of climate change and highways as set out in the National Policy Statement for National Networks (NPSNN).</p>

Number	Directed to	Question	Applicant's Response
			<p>The National Policy Statement for National Networks (NPSNN) was considered at the time of writing of the ES. However, the NPSNN predates the 2019 Order, and therefore the revised carbon target has not been taken into account in the NPSNN. For the same reason, the revised carbon reduction target was also not taken into account when preparing Chapter 14 Climate Change of the Environmental Statement (Document Reference 6.2) [APP-067].</p> <p>Notwithstanding this, the revised carbon reduction target would not materially alter the assessment of climate change in the Environmental Statement and the conclusions reached. The scheme, in isolation given the scale of emissions it creates, would not have a long term detrimental impact on the Government's ability to meet its carbon targets. As such, the effect would remain as not significant for the purposes of the Environmental Statement.</p>
4.5.1	Applicant	<p>Compulsory Acquisition</p> <p>In relation to the response to Q3.5.1 it is noted that the Applicant does not consider that there are clear reasons for departing from the original wording of Article 33(8). Having reviews the matter, the ExA considers that the current drafting of the dDCO may, through the definition of "Order land", prevent the CA of new rights in land described as being for temporary possession in the Book of Reference ("BoR") and shown as such on the land plans in any event. The "Order Land" is defined as "the land shown on the land plans which is within the limits of land to be acquired or used permanently or temporarily and described in the BoR". The BoR describes the land as being for temporary possession and the Land Plans show this land as being for temporary possession; there is no indication that new rights will be created in this land. However, in light of the applicant's responses regarding the intention of the DCO to authorise CA</p>	<p>As stated in previous submissions, the Applicant's intention is to temporarily possess the plots in question for the purposes set out in Schedule 7 to the dDCO (Document Reference 3.1(G)) [REP7-003]. Although the Applicant is confident at this stage that it will not be necessary to create permanent rights over these plots, Article 33(8) would nonetheless provide important flexibility to the Applicant to do so should the creation of a permanent right prove to be necessary at a future stage. As the creation of a permanent right would increase the Applicant's liability to pay compensation, the Applicant would only seek to use this power if it was considered to be absolutely necessary.</p> <p>At Deadline 6 the Applicant proposed revised wording for Article 33(8) that would restrict the rights that could be created over these plots to rights relating to the purposes for which the plots may be temporarily</p>

Number	Directed to	Question	Applicant's Response
		<p>of new rights in the land described as being for temporary possession, if the ExA does not recommend this CA, the ExA is minded to consider recommending the following in relation to Article 33 to remove any ambiguity about the extent of CA authorised by the DCO:</p> <p><i>8) The undertaker may not compulsorily acquire under this Order the land referred to in paragraph (1)(a)(i) except that the undertaker is not precluded from—</i></p> <p>(a) <i>acquiring new rights or imposing restrictive covenants over any part of that land under article 26 (compulsory acquisition of rights) to the extent that such land is listed in column (1) of Schedule 5 or</i></p> <p>(b) <i>acquiring any part of the subsoil of or airspace over (or rights in the subsoil of or airspace over) that land under article 31 (acquisition of subsoil or airspace only).</i></p> <p>Please provide any further comments you may wish the ExA to take into account in relation to this matter.</p>	<p>possessed, as specified in Schedule 7 to the dDCO. That wording would, in the Applicant's view, resolve the ExA's previously expressed concern about the DCO conferring the power to create permanent unspecified rights over these plots. The Applicant's revised wording would in its view strike an appropriate balance between the granting of the power to create unspecified rights over these plots, as has been included in previous orders made as recently as September 2018, and the complete removal of this power, which for the reasons explained below would be the effect of the wording now proposed by the ExA.</p> <p>The Applicant does not agree that the definition of 'Order land' would prevent the compulsory acquisition of new rights in land described as being for temporary possession in the BoR and on the Land Plans if the Applicant's revised Article 33(8) were to be included in the DCO. The dDCO uses the same definition of 'Order land' as has been included in previous orders which have granted the power to create permanent rights over land that has otherwise been identified as being for temporary possession only. The 'Order land' is all of the land shown on the Land Plans as being acquired or used permanently or temporarily. The definition does not determine which parts of the land may be subject to outright acquisition, the creation of permanent rights and/or temporary possession. That is determined by the Articles, including Article 33(8). The definition would not therefore, in the Applicant's view, act as a limitation on the operation of Article 33(8).</p> <p>The Applicant does not consider that the ExA's proposed wording provides a satisfactory solution. That is because there is no overlap between the land listed in Schedule 5 and the land listed in Schedule 7. They are mutually exclusive, so if a plot is listed in Schedule 5 it is</p>

Number	Directed to	Question	Applicant's Response
			<p>not listed in Schedule 7 and vice versa. Therefore, including wording that says that the undertaker is permitted to acquire new rights or impose restrictive covenants over the land referred to in Schedule 7, but only to the extent that it is listed in Schedule 5, would be redundant, since none of the land referred to in Schedule 7 is listed in Schedule 5.</p> <p>The Applicant has demonstrated in the Statement of Reasons that the tests in s.122 of the Planning Act 2008 and the CA Guidance are met in relation to all of the plots proposed to be subject to compulsory acquisition and temporary possession. The Applicant emphasises that it is not seeking a new or unusual power in Article 33(8) and in response to the ExA's previous concerns it has offered revised wording, not deemed necessary in previous orders, which would significantly restrict its power to create rights over the land identified as being for temporary possession. If the ExA and/or the Secretary of State are of the view that a departure from the established wording is required, the Applicant invites them to include the Applicant's revised wording in the DCO.</p>
4.5.3	Applicant	<p>a. ScottishPower Renewables</p> <p>It is noted that Highways England (HE) question whether the relevant ScottishPower Renewables (SPR) company is a statutory undertaker and therefore entitled to the benefit of Protective Provisions.</p> <p>Please indicate why you believe that the relevant SPR company may not be a statutory undertaker.</p>	<p>'Statutory undertaker' for the purposes of s.127 of the Planning Act 2008 ('PA 2008') is defined in s.127(8) as having the meaning given by s.8 of the Acquisition of Land Act 1981 ('ALA 1981'). SPR does not fall into any of the categories in s.8.</p> <p>Under s.127(8) 'statutory undertaker' also includes (a) undertakers deemed to be statutory undertakers for the purposes of the ALA 1981 by another enactment; and (b) undertakers which are statutory undertakers for the purposes of s.16(1) and (2) of the ALA 1981. S.16 ALA 1981 relates to health organisations only so is not relevant to SPR. That means that (a) is the only</p>

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			<p>apparent option by which SPR might qualify as a statutory undertaker.</p> <p>Paragraph 2(2) of Schedule 16 to the Electricity Act 1989 ('EA 1989') confirms that a licence holder "entitled to exercise any power conferred by Schedule 3" (compulsory acquisition by licence holders) to that Act is deemed to be a statutory undertaker for the purposes of the ALA 1981.</p> <p>S.10 of the EA 1989 confirms that Schedule 3 applies to holders of a transmission licence and any other licence, to the extent their licence so provides.</p> <p>ScottishPower Renewables (UK) Ltd, which is the company with the interest in the Carland Cross Wind Farm, holds a generation licence dated 1 March 2005. According to the information available on the Ofgem Electronic Public Register as at 23 July 2019 that licence excludes standard condition 14, which in the current version of the Electricity Generation Licence Standard Conditions is the condition conferring compulsory purchase powers under Schedule 3 EA 1989, albeit only in relation to 'generating stations' with a capacity of at least 50MW (which does not include the Carland Cross Wind Farm).</p> <p>In summary therefore, based on the Applicant's assessment, SPR would only qualify as a statutory undertaker for the purposes of s.127 PA 2008 if it holds a licence that includes compulsory acquisition powers conferred by Schedule 3 to the Electricity Act 1989. Based on the above the Applicant considers that there is doubt as to whether SPR's electricity generation licence includes these powers and therefore whether it is a statutory undertaker for the purposes of s.127 PA 2008.</p>

Number	Directed to	Question	Applicant's Response
			<p>The Applicant recognises however that this issue has not been fully explored with SPR until now and so SPR may be able to provide additional information to the ExA that confirms that ScottishPower Renewables (UK) Ltd is a statutory undertaker for the purposes of s.127 PA 2008.</p>
4.5.4	Applicant	Please indicate the legal basis for your assertion that a private company may not be entitled to protective provisions.	<p>For the avoidance of doubt, the Applicant does not assert that a private company (which is used here in a general sense as meaning a company which fulfils a private, rather than a public or statutory, function) cannot benefit from protective provisions. Section 120 and paragraph 10 of Part 1 of Schedule 5 to the PA 2008 confirm that an order may include provision for “the protection of the property or interests of any person.” A review of previously made DCOs confirms however that protective provisions are most commonly included for the protection of statutory undertakers, local authorities, airport and railway operators and other organisations that fulfil a public or statutory role, such as the Environment Agency.</p> <p>It is important to note that as the holder of an electricity generation licence, SPR is a ‘licence holder’ for the purposes of Part 1 of the Electricity Act 1989 and therefore would benefit from the protective provisions already included in Part 1 of Schedule 9 to the dDCO. The question here therefore is whether it is appropriate that SPR should benefit from bespoke protective provisions of the kind it has requested at Deadline 6 [REP6-026].</p> <p>In the Applicant’s view the inclusion of bespoke protective provisions of the kind requested by SPR must be approached with considerable caution. As explained at Deadline 7 [REP7-012], the protective provisions requested by SPR would grant it the power to delay the entire Scheme indefinitely. They would impose</p>

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			<p>restrictions on the entire Scheme, when SPR's interest is only in certain parts of it. They would also impose indemnity provisions which do not contain any limitation or exclusion and which therefore, amongst other things, would render the Applicant liable for any costs or losses incurred by SPR as a result of SPR's own negligence, which is plainly unreasonable.</p> <p>The ExA will note that the Applicant submitted protective provisions at Deadline 7 that it would be prepared to accept in the event that the ExA and the SoS take the view that the protective provisions in Part 1 of Schedule 9 to the dDCO are not sufficient to protect SPR's interests and that bespoke protective provisions in favour of SPR are therefore required. In the Applicant's view these strike a much more reasonable balance between the competing interests of SPR and the Applicant and where applicable they are more similar to the protective provisions set out in Part 1 of Schedule 9.</p>
4.3.1	Applicant	<p>e. Pennycomequick It is understood that the requested amendments have been withdrawn and the application is to be considered as originally drafted.</p> <p>In making the original request for a non-material amendment, you appear to have accepted that the acquisition of rights, rather than outright CA, could be used in relation to this land. Please indicate why permanent acquisition is required in relation to this land.</p>	<p>As stated in the Highways England comments on Interested Party submissions at Deadline 6 (Document Reference 8.27) [REP7-012], it is considered that permanent acquisition is required in order to construct and maintain the scheme. Specifically:</p> <p><i>“Access is required to maintain the stream downstream of the existing A30 and upstream of the new A30, and the associated drainage. Although the existing A30 will be operated and maintained by Cornwall Council, the works on this stream are required as part the new scheme for Highways England to maintain the stream and the associated culverts and drainage outfalls.”</i></p> <p>This maintenance may require works that are not just related to access, but also include physical works to the stream, such as that which may be required to remove a blockage.</p>

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			<p>Highways England offered to downgrade the stream to the acquisition of rights in order to come to an agreed position with the Harvey Family. This was on the understanding that an agreed position would allow such work to be undertaken in the future without relying on permanent acquisition. The Harvey Family rejected this offer, and so Highways England cannot rely on an agreed position to carry out works that would require the powers conferred by permanent acquisition.</p> <p>Highways England is of the firm view that the tests in s.122 of the Planning Act 2008 and the CA Guidance are met in relation to this land.</p>
4.11.1	Applicant	<p>A. Matters raised by Cornwall Council</p> <p>It is noted that HE does not believe that the measures referred to are required to deliver the A30 Chiverton to Carland Cross scheme, nor to mitigate impacts of the scheme itself. In relinquishing the existing A30 HE is passing an asset to the local authority; this brings about a financial implication for the authority and the local community.</p> <p>In relation to the route selection it is noted that one of the reasons for the proposed alignment parallel to the existing A30, using a minimum length of A30 in the new route, was to minimise conflict between the construction works and the existing traffic during construction and reduce disruption to existing statutory undertaker equipment. It is also understood that the use of the de-trunked A30 as a parallel emergency diversion route, in case of incidents on the proposed A30, is seen as an advantage to the scheme.</p> <p>The National Policy Statement for National Networks ("the NPSNN") indicates that the Government expects applicants to improve access, wherever possible, on and around the national networks by designing and delivering schemes that take account of the accessibility requirements of all those</p>	<p>Paragraph 5.126 of the NPSNN states that:</p> <p><i>"There is a very strong expectation that impacts on accessibility for non-motorised users should be mitigated."</i></p> <p>Paragraph 12.11.59 of Chapter 12 People and Communities of the Environmental Statement (Document 6.2) [APP-065] states that <i>"Reclassification and a significant reduction in traffic flows would also facilitate and allow improved conditions for walkers, cyclists and horse-riders along the existing A30"</i>. Paragraph 12.11.60 concludes that there is likely to be a long term and slight beneficial effect of the scheme for walkers, cyclists and horse-riders.</p> <p>It is the conclusion of the Environmental Statement that the scheme as proposed does provide a long term and slight beneficial effect for non-motorised users.</p> <p>Given this, it is not considered that the further measures outlined by Cornwall Council are required as reasonable and proportionate mitigation. A response to each proposed measure as set out in Cornwall Council's</p>

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		<p>who use, or are affected by, national networks infrastructure, including disabled users. It also sets out that applicants should consider reasonable opportunities to support other transport modes in developing infrastructure; Cornwall Council have identified the intention for increased use of the detrunked sections of the A30 by non-motorised users.</p> <p>Given the interrelationship between the existing and proposed routes, and the expectations set out in the NPSNN, please provide any further comments you may wish to be taken into account as to why the measures set out by Cornwall Council would not be seen as proportionate and reasonable mitigation.</p>	<p>Supplementary report on matters outstanding [REP6-024] is set out below.</p> <p>Cornwall Council propose measures for safety on the existing A30, Boxheater junction, walking, cycling and horse riding facilities on the existing A30, and Shortlanesend.</p> <p><u>Safety record on the existing A30</u></p> <p>Highways England consider that the existing A30, with the required changes to the associated traffic signs, will provide safe and suitable access for all road users. The existing road layout can currently accommodate abnormal load vehicles for the adjacent wind farms and would also be suitable as the proposed temporary diversion route for the new scheme.</p> <p>Section 8.4 of the Transport Report (Document Reference 7.5) [APP-049] states that there will be overall benefits from the scheme in terms of a reduction in accidents in the area of the scheme.</p> <p>The Cornwall Council report [REP6-024] refers to off peak time periods to reflect the anticipated lower level of traffic on the existing A30, following construction of the new A30. However, the traffic flows will be significantly less on the existing A30 with the scheme in place, resulting in a reduction of the type of accidents caused by congestion on the existing A30 (such as rear shunts).</p> <p><u>Boxheater Junction Realignment</u></p> <p>As stated in the Highways England Statement of Common Ground with Cornwall Council (Document Reference 7.4.1) [REP7-011]:</p>

Number	Directed to	Question	Applicant's Response
			<p><i>Highways England does not consider that funding of these improvements [to boxheater junction] is required as there is no evidence from traffic modelling that the scheme will impact traffic movements or safety at Boxheater junction.</i></p> <p>There is no conclusive evidence of a collision record relating to the existing Boxheater junction layout on the A30. Highways England acknowledge with the new A30 and continued use of the existing A30 by local traffic, there is forecast to be more traffic on the B3285 than the existing A30.</p> <p>However, the existing junction layout will operate well within its capacity for all arms following this change in movements. This is not considered to introduce any new safety issues for the junction.</p> <p>The direction and advance direction signage would play an important role in the safe operation of the junction. It would inform drivers to expect a junction ahead, and the layout of the junction, before the junction becomes visible. This would indicate to drivers when they are required to give way to other traffic. The existing junction layout can also currently accommodate abnormal load vehicles.</p> <p>Given this, it is not considered that works to Boxheater junction would be necessary or proportionate mitigation.</p> <p><u>Provision for Walkers, Cyclists and Horse riders (on the existing A30)</u></p> <p>Extensive consideration has been given to non-motorised users in the design of the scheme. Connectivity for non-motorised users will improve as a result of the scheme, as reflected in the conclusions of</p>

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			<p>the Environmental Statement stated above. It is considered that this overall improvement fulfils the intention of paragraph 2.9 of the NPSNN, that schemes seek to enhance accessibility for non-motorised users.</p> <p>As stated in the Highways England Statement of Common Ground with Cornwall Council (Document Reference 7.4.1) [REP7-011]:</p> <p><i>Provision for WCHs on the existing A30 will not be funded by Highways England as part of the scheme. It is considered this funding is not necessary due to the reduction in traffic on the existing A30 as a result of the scheme, and the consequent benefit of this for WCH users as stated in paragraph 12.11.33 of Chapter 12 People and Communities of the Environmental Statement (Document Ref 6.2) [APP-065].</i></p> <p>Provision for walking, cycling and horse riding has been reviewed during Examination and further amends made in response to feedback from user groups and the ExA, specifically regarding: A39 Bridleway Crossing, Bridleway VV realignment and the footpath to open access land.</p> <p>The walking, cycling and horse riding provisions proposed on the existing A30 through the Designated Funds programme are a separate scheme of enhancements as with the new Chiverton cycle footbridge.</p> <p><u>Mitigation for impacts on Shortlanesend</u></p> <p>As stated in the Highways England Statement of Common Ground with Cornwall Council (Document Reference 7.4.1) [REP7-011]:</p>

Number	Directed to	Question	Applicant's Response
			<p><i>Highways England do not consider that the measures outlined by Cornwall Council are necessary to construct and operate the scheme.</i></p> <p>Highways England maintains the position set out by Cornwall in the Comments on the Local Impact (Document 8.5) [REP2-021], that:</p> <p><i>“Shortlanesend already benefits from a range of traffic management measures, such as controlled and uncontrolled pedestrian crossings, junction improvements and speed activated signs to reinforce the speed limit through the village. As stated in the LIR, the measures are considered by Cornwall Council to have addressed previous road safety and speed issues and they are considered by Highways England to remain appropriate for the increased future traffic levels predicted with the scheme”.</i></p> <p>As reported at paragraph A.2.12 of the Cornwall Council Local Impact Report [REP1-010], Cornwall Council agree with the proposed junction strategy and traffic modelling for the scheme. This includes the provision of west facing slips at the Chybucca junction to provide an alternative route to the Chiverton junction for west Cornwall traffic to and from Truro.</p> <p>With the existing traffic management measures (signalised crossing and pedestrian refuges) and the possible addition of further speed and warning signage and road markings (circa £10k), Highways England consider the traffic speeds would remain low and the increase in traffic would not have any significant impact on the local community in Shortlanesend.</p>
4.11.2	Applicant	B. Chybucca Junction	<p>As stated in section 2.3 of the Highways England Comments on Interested Party Submissions at Deadline 5 (Document Reference 8.25) [REP6-022], an</p>

Number	Directed to	Question	Applicant's Response
		<p>It is noted that an error in the data supplied to HE was discovered when compiling the response to the Connect Consultants Limited Report, submitted by Stephens Scown on behalf of Mr Sam Parker [REP5-036]. As a result, revisions to the diagrams in Annex A of the PCF Stage 3 Traffic Data Collection Report [REP5-030] have been submitted.</p> <p>Please indicate the degree of confidence which can be placed on the rest of the data from this source and, therefore, the subsequent calculations undertaken on the basis of this data source.</p>	<p>error was noticed in the data presented in Annex A of the PCF Stage 3 Traffic Data Collection Report submitted to Highways England by WSP in August 2017 [REP-031].</p> <p>To provide clarity, background to the traffic surveys undertaken at this site and how the data was subsequently used is set out below.</p> <p>Junction turning counts were undertaken at the existing A30 Chybucca Junctions in March 2014 by Traffic Survey Partners (TSP) on behalf of Highways England.</p> <p>The data collected from these junctions during the surveys was used to provide evidence of the vehicle turning movements across the junctions as set out in Annex D of the PCF Stage 3 Local Model Validation Report [REP5-028].</p> <p>The vehicle movements across the junctions were calculated by vehicle class in line with the vehicle class definitions used in the A30 Traffic Model. This observed turning count data was used in the calibration process of the A30 traffic model. The observed numbers from the raw data provided to Highways England from the surveys undertaken in March 2014 by TSP match the observed turning movements reported in Annex D of the PCF Stage 3 Local Model Validation Report [REP5-028].</p> <p>The error in Annex D of the Traffic Data Collection Report [REP5-030] produced by WSP in August 2017 was in a summary flow diagram. These summary flow diagrams for the AM peak, interpeak and PM peak periods were produced for illustrative purposes only. The summary flow diagrams were not used as part of the A30 model development process or the calibration/validation process. Therefore, the error in the</p>

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			<p>summary flow diagrams should not impact on the degree of confidence over any of the observed and modelled traffic flows.</p> <p>Highways England has full confidence in the observed junction turning count data supplied by TSP and the subsequent calculations used in the calibration/validation process of the A30 traffic model.</p> <p>Following a review of the traffic modelling documentation submitted as part of the DCO process, Cornwall Council agree the traffic data used to inform the model development is sound and fit for purpose, the model has been developed in accordance with WebTAG criteria, and the model meets the calibration/validation criteria as recorded in references 20.1, 20.2 and 20.3 of the signed Statement of Common Ground with Cornwall Council (Document Reference 7.4.1) [REP7-011]. Therefore, Cornwall Council agree that the A30 traffic model replicates network conditions across the study area to the required standards.</p>

Appendix A Extract of Table 14-12: Comparison of predicted carbon emissions relative to UK carbon budgets

Project stage/ Activity	Estimated carbon during different carbon budget periods - 'Do Something' scenario (with scheme)(tCO2e)	Estimated carbon during different carbon budget periods – 'Do Minimum' scenario (without scheme) (tCO2e)	Net change as a result of the proposed scheme (tCO2e)	Carbon Budget (tCO2e)		Net emissions from scheme as percentage of relevant carbon budget (tCO2e)
Construction of scheme	79,920	-	79,920	3rd	2,544,000,000	0.00314%
Operation of scheme	1,150,640	1,147,990	2,650	3rd	2,544,000,000	0.00010%
	1,116,490	1,241,520	- 125,030	4th	1,950,000,000	-0.00641%
	1,187,900	1,288,270	- 100,370	5th	1,725,000,000	-0.00582%

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