Mark East



27 March 2023

RE: National Highways for the A12 Chelmsford to A12 Widening Scheme (ExQ2)

Interested Party No. 20032383

Q2.2.2

The WHO Guidance is totally supported by Committee on the Medical Effects of Air Pollutants and the Royal College of Physicians and they are recognised as the experts on the impact of poor air quality on human health. The UK Government recognises their expertise which can be demonstrated through DEFRA's Clean Air Strategy 2019 and the recent introduction of the Environment Act 2021.

National Highways appears to rely on the Design Manuals for Roads and Bridges, published in 2019, for their assessments and conclusions. I would respectfully suggest that this manual is out of date as it does not recognise the WHO guidance or contribute in a positive way to meeting DEFRA's Clean Air Strategy 2019.

It is my personal view that the WHO guidance should be given 'Significant' weight against the scheme and given the negative health impact brings into question whether this project can realistically be considered as 'Sustainable Development'.

Q2.2.3

As mentioned in Q2.2.3 parties should recognise DEFRA's Clean Air Strategy published 2019 and the applicant should recognise that the Design Manuals for Roads and Bridges LA 105 is out of date. Legislation introduced through the Environment Act 2021 requires full consideration.

The Secretary of State for Transport must recognise that if he was minded to grant the scheme they do so in the full knowledge that the scheme as presented represents a significant health risk to many residents based on reports from their own advisor (COMEAP).

Q2.2.4

Modelling and assumptions have been generated on data and trends of past and are thought to be unreliable given the economic forecast for the UK over the next 5 years. As things stand the take up of electric vehicles, other than in limited circumstances, is not viable for many. Any modelling factoring in the benefits of electric vehicles should be rerun taking into account the present economic outlook and likely affordability of such vehicles to the public at large.