

Note of representation to Issue Specific Hearing 6: Traffic and transportation

Dubious values: the Contingent Valuation Study for the A303 Stonehenge

Dr Suzanne Keene
June 2019

Summary

The Contingent Valuation Study (CVS) accounts for 73% of the monetised value of the project. Highways England maintains that this is not a matter for the enquiry, but the NPSNN (Para. 4.5) is clear that it is.

The survey provided certain information about the project to respondents and then asked them what tax they would be willing to pay (or compensation to accept) for the project. This was then statistically multiplied up to give a value for the whole population.

In the survey, respondents were shown images of Stonehenge, the road and a map, all before and after the project, but no images or realistic information about the cuttings and tunnel portals.

The CVS Report included a caveat: “... *Therefore, it should not be interpreted that this study captures or seeks to capture every aspect of the scheme’s impacts on heritage and archaeology*” which appears to have been ignored.

The monetised results were used to arrive at the figure of £1.15 benefit for every £ spent as cited in the National Audit Office report. Without the monetised results of the CVS the benefit would be only 31p for every £1 spent.

Had respondents been given full information about the extent of destruction of archaeological evidence and the enormous size and scope of the tunnels, it must be very unlikely that they would have been willing to volunteer the same amount of income tax, and the scheme would not have been costed as viable.

Introduction

1. The Contingent Valuation Study (CVS) as the NAO has stated, accounts for 73% of the monetised value of the project.
2. In the CVS that was used in this project respondents were not shown images of the tunnel cuttings and portals and were not informed about their extent and effects on the archaeology and landscape. These are very serious flaws.
3. Others have also critiqued the validity of the method in this case. In particular, James has found very serious problems with the sampling and statistics (James REP2-130, Morris REP1-068).
4. Highways England maintains that costs are not a matter for the Examination but for the Department of Transport. However, the NPSNN, para. 4.5, says: “The economic case prepared for a transport business case will assess the economic, environmental and social impacts of a development. ... This information will be important for the Examining Authority and the Secretary of State’s consideration of the adverse impacts and benefits of a proposed development.”

What were respondents valuing?

5. The figures for value were arrived at from informing respondents about only part of the effect on the landscape.
6. The study “focuses on noise reduction, increased tranquillity, visual amenity and reduced landscape severance” (CVS Report 2.2; HiEng ComMA EAP, 5.9.3). It did not address the loss of archaeology and damage to the WHS. “... archaeological impacts are outside the scope of this study” (CVS Report, 2.2). *It did not present respondents with information about the loss of archaeology nor the severance of large areas of the site by the new cuttings and portals* (CVS Questionnaires).
7. This was a conscious decision. “The steering group discussed and agreed that further information would have been misleading because the heritage and archaeological impacts of the tunnel and its portals are not yet known.” (CVS Report, 5.1.11).
8. By focusing on the immediate surroundings of the stones, the survey deliberately set out to ignore the effects on the archaeological setting and on the WHS. This seems an extraordinary decision to take considering the immense public interest in the archaeology of the Stonehenge landscape (Keene REP2-169, paras. 10-12), as it could only result in biased responses.
9. The survey report has a clear caveat:

“... Therefore, it should not be interpreted that this study captures or seeks to capture every aspect of the scheme’s impacts on heritage and archaeology.” (CVS Report, 5.1.11) Yet the results have been used in the business case as though all impacts on heritage were represented.

Information provided to respondents

10. Respondents were shown images of maps, of the road seen from Stonehenge, and from right beside the road, before and after. *They were not shown images of the cuttings and portals* (CVS Questionnaire, Appendix A1).
11. As well as other information, respondents were given this key information (Quoted from CVS Questionnaires, p. XXIII):
 - The A303 within Stonehenge World Heritage Site would no longer be visible from Stonehenge. *True*
 - Reduced traffic noise whilst visiting the stones, which would make large areas of the World Heritage Site more tranquil. *True*
 - Removal of the A303 would reconnect the World Heritage Site to the north and south of the existing A303 allowing visitors to walk freely between Stonehenge and other archaeological sites in the World Heritage Site.
Misleading – one can already walk most of the WHS north of the A303, and to the south is mostly private farmland.
 - Tunnel entrances would be constructed within the Stonehenge World Heritage site. These would not be visible from the stones but would be new visible features in the archaeological landscape, although the road would be carefully designed to reduce its impact as far as possible.

But respondents were not shown visuals which graphically show the effects and extent of the cuttings and portals – only a map.

- Dual carriageways would lead up to the tunnel entrances, including the short sections inside the World Heritage site.

But they weren't told that the dual carriageway would run through enormous cuttings at both the west and east, nor about the visible interchanges at either end.

- Stonehenge would not be visible from the new A303 route. *True*
- A route along the old A303 route would provide access for cyclists, horse riders and walkers.

12. Respondents were told twice that the survey was not a public consultation but *they were not told that it would feed into the final decision*. Yet economists recommend that respondents be told that their replies will be consequential (Haab *et al*, p.7).

The survey and the business case

13. After various questions on their opinions and pre knowledge of Stonehenge, respondents were asked what increased tax they would pay for these benefits, or if none, what compensation they would accept if the scheme went ahead. The total figure for the additional tax, *less* the compensation figure for those not willing to pay, was multiplied up for the whole population (with due statistical adjustments).
14. The monetarised value from the HVS amounts to 73% of the BCR -- Traffic and transport benefits only 27% (NAO Report). The Economic Appraisal Package discusses and includes the CVS Report as Appendix H, and a quality assurance report Appendix I, but the QA authors did not see the survey visuals and questionnaires (HiEng ComMA EAP, 5.9.2, 5.9.3). James (REP2-130) finds serious issues with the methodology of the CVS.
15. "Respondents were likely to focus on the benefits of removing the road from Stonehenge", as the HiEng ComMA EAP Appendix I, Quality Assurance, acknowledges. In fact they were actually directed to do so in the survey. The quality assurance fails to detect the major issue: that respondents were not told about the damage to large areas of the WHS and loss of archaeology due to tunnel cuttings and portals.

Conclusion

16. Suppose respondents had been given full information about the impact of the scheme:
 - That the western tunnel portal would destroy part of the densest concentration in Britain of Neolithic long barrows, about 5000 years old, and part of a major Bronze Age settlement (Mike Parker Pearson / Consortium of archaeologists, 001092)
 - That to the east, roads would be constructed very close to the Mesolithic remains at Blick Mead with the aurochs' footprints. The settings of the Stonehenge Avenue, Vespasian's Camp and a Bronze Age cemetery would be spoilt.
 - That their reply was likely to contribute to a decision.

17. What taxes would respondents have been willing to pay if they had known that the consequence of removing the road from the vicinity of Stonehenge itself would be the loss of so much archaeology, especially in view of the huge public interest in the scheme, with over 25,000 consultation responses (Keene REP3-078)?
18. It is not credible that respondents would have been willing to pay the same level of taxes had they been shown visuals of the tunnel portals and cuttings.
19. Can the values ascribed to heritage from this survey really still be used to determine 73% (now risen to over 80%) of the monetary value of this project?
20. The statistical and sensitivity analysis and quality assurance exercise are irrelevant. The basic data are erroneous and hence so are the results from this contingent valuation study.

Note: In 2017 Highways England supplied both the CVS Report and the CVS Questionnaire files in response to a Freedom of Information request, and those are the documents referenced here, published on <https://a303stonehenge.home.blog>.

References

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