

From: [REDACTED]
To: [A303 Stonehenge](#)
Subject: Stonehenge A303 tunnel
Date: 04 April 2022 12:19:53

I am writing in response to the further consultation on the latest Stonehenge tunnel scheme review. At the outset I wish to express my astonishment that the SoS for Transport is making any attempt whatsoever to keep the current scheme alive, in the face of the damning conclusions of the Examining Authority (EA) at the 2019 DCO inquiry, added to the warnings from ICOMOS over WHS status. The DCO inquiry scrutinised the proposal in forensic detail, and found it wanting: what more do we need to know?

I shall confine my more detailed comments to areas of costs, benefits, and the BCR. I wrote the evidence presented by the Stonehenge Alliance on the Contingent Valuation (CV) exercise. On reviewing that evidence, along with Phil Goodwin's compelling presentation on the bias effect of the question asked, I am more convinced than ever that this was a bogus exercise that should not have been given any credence, far less being allowed to comprise 75% of PVB without serious questioning of its robustness. Having recently read David Spiegelhalter's book 'The Art of Statistics', the statistical fallacies of the Stonehenge CV are even more manifest. In particular, the point made in my submission, that a sample group must be demonstrably representative of the population it seeks to sample, is made clear: and it is very clear that the small sample of the 'general population' in the CV was not merely too small to give a reliable result, it was demonstrably not representative of the adult population of the UK.

The main points I wish to make relate to changes to the financial climate since the DCO in 2019, and especially recent events:

1. Construction costs have spiralled recently, and although I do not have a figure they are at least 20% higher than in 2019, let alone the cost base on which the 2010 discounted cost of £1.2 billion was calculated.
2. The cost of living crisis is biting deeply even amongst middle income groups, so the Willingness to Pay figure in the CV (£14.41 pa for three years) is now called into serious question.

As highlighted in my submission to the DCO, the BCR of 1.08 was very low, and susceptible to fairly minor changes in the costs or benefits. It is very clear that current costings would be way higher than in the above BCR, and in the absence of a further CV exercise (which as Phil Goodwin suggests should pose the two questions of WTP to improve the setting of Stonehenge and WTP to cause significant and irreversible damage to the WHS) it may be assumed that the WTP of the general population will have gone down as there is less money around. A movement of less than 10% in the combined effect of increased NVC and decreased NVB would wipe out the already minimal positive BCR.

I am therefore confident that the current Stonehenge tunnel scheme no longer meets even the minimum requirement of a BCR greater than 1, even without further questioning of the suspect methodology used to boost the heritage benefits. If the government wishes to argue otherwise, the least it must do is to update the BCR calculations and open them to scrutiny, along with an explanation of why they disputed the findings of the EA even with the marginally positive BCR. Better still, the government should abandon this ill-conceived scheme.

Best wishes,

Alan James