

From: [REDACTED]
To: [A303 Stonehenge](#)
Subject: A303 Amesbury to Berwick Down-TR010025 Re-determination
Date: 03 August 2022 20:01:43
Attachments: [Stonehenge - Re-determination Jul 22 RFB.docx](#)

Please find attached my comments in letter format, in response to the Secretary of State's letter requesting comments on the Applicant's response to the questions in his letter dated 20 June 2022.

RF Bainton

Your Unique Ref: 20019940



3 August 2022

Dear Sir/Madam,

A303 Amesbury to Berwick Down - TR010025

Planning Act 2008 and the Infrastructure Planning (Examination Procedure) Rules 2010

Re-determination of the Application by National Highways (formerly Highways England) for an Order granting Development Consent for the Amesbury to Berwick Down

Thank you for your letter dated 13 July 2022. I should like to comment on the Applicants response to the Secretary of States letter dated 20 June 2022, (Document reference: Redetermination 4.1), as outlined below.

The Applicant's response to the request for comments refers to the business case in Section 3 . It refers in particular to Traffic Modelling at 3.3.5

(1)

I understand the traffic forecast methodology include "the cost of making a trip influences road traffic levels" and its central projection has been based on an assumption that fuel costs would stay well below their 2010 peak.

Current fuel prices exceed by some margin (over 30%) above this allowing for inflation from their base year of 2018.

Although the adoption of a clear forecasting methodology has some benefit, it should remain aligned to the real world it attempts to model. If changes occur that break links to reality, then any forecast based on a flawed methodology is, at best, of academic interest only, as it is unlikely to generate an accurate forward projection of any credibility and certainly none on which a rational decision should be based.

With the passage of time some of the fuel price increase is due to the invasion of the USSR into Ukraine and the ensuing conflict. With the instability this has created in oil trading and energy supply there is no reliable forward price estimate possible or time frame to expect prices to fall back.

Considering the climate crisis there will be increasing pressures to limit a future price reduction both due to market forces; and the need to meet climate targets, the government has now set.

The comfort the Applicants seeks to rely on in section 3.3.9 is not valid, as the current situation was not present at the time this was considered.

(2)

I also understand The DoT traffic forecast assumed traffic growth of 17-51% based on assumed fuel efficiency increases reducing the costs of making trips. However, car manufacturers have continued to heavily promote SUV vehicles, as they provide a higher profit margin at initial sale, and new car sales have been dominated by this change in consumer demand. SUV's have a lower fuel efficiency than smaller and lighter cars.

Again, this assumption no longer holds; or takes account of the switch to an increased use of electric vehicles.

(3)

The DoT assumed in 2018 that car ownership would constantly increase and be 38% higher in 2050 than 2015. Ownership has in fact reduced over the last two years. Both the anticipated population growth and GDP are lower than anticipated.

The current cost of living crisis is more likely to lead to a continuing reduction in car ownership than increase in the next few years.

(4)

The response to Covid-19 has seen a reduction in commuter traffic and an increase in home-based working. The commercial property market is reflecting a forward view of a long-term reduction in office-based work.

Having read the Applicants response, I am not convinced by the position they have taken. It seems to me for all the reasons above, there is no valid justification of a future increase in highway demand to justify an increase in greater highway capacity for the proposal at Stonehenge.

COP 26

The government has set national targets for carbon reduction by 2030. In view of the recent High Court Case, the government has been asked to explain how these targets will be met. This concern has been raised by the governments own advisory body, the Climate Change Committee.

This is an additional requirement the scheme should satisfy, if decision making is to be rational. I am not clear what the impact of the proposal is, despite the response provided.

I hope the above matters may receiver consideration.

Yours faithfully,

RF Bainton

Robin Bainton CEng MICE