

**National Highways: A303 Amesbury to
Berwick Down Project, Development Consent
Order Application**

Scheme Reference: TR010025

**Comments on National Highways Document:
Redetermination 4.1 “A303 Amesbury to Berwick
Down: Response to Secretary of State’s letter 20
June 2022: Applicant’s response to the request
for comments Q1, Q3-6 – Response document”**

**Regarding carbon, traffic forecasting, business
case, cumulative impacts and alternatives**

for

**The Stonehenge Alliance
(Reference No. 2001870)**

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August 2022

1. Introduction

1.1 This paper provides the Stonehenge Alliance’s comments on National Highways (NH) document 4.1 “Response to Secretary of State’s letter 20 June 2022: Applicant’s response to the request for comments Q1, Q3-6 – Response document” in relation to carbon, traffic forecasting, business case, cumulative impacts and alternatives. These are addressed in turn in the sections that follow. Finally, we provide some overarching concluding comments.

2. Carbon

2.1 In response to the submissions made by the Stonehenge Alliance on carbon in April¹ and June 2022², NH asserts that “no additional information and / or assessments relating to carbon are needed”. We strongly disagree with this position and re-assert our view, set out in our previous submissions, that the analysis undertaken by NH is fundamentally flawed and inadequate in a number of key areas. These include:

- It is inconsistent with the Department for Transport’s Transport Decarbonisation Plan³;
- It is not consistent with other Government policy on carbon reductions and the UK’s international commitments under the Paris Agreement;
- It is based on a flawed and implausible scenario of future levels of road traffic, as discussed below;
- NH misinterprets policy statements and guidance on the significance of carbon emissions;
- No regional or sectoral assessments of the impact on carbon budgets have been carried out, although the tools to do this are readily available; and
- No meaningful assessment of the cumulative impacts of the project in combination with other schemes at a regional or national level has been carried out, in spite of the express request from the Secretary of State to provide this, and widespread public concern.

2.2 In his recent judgement in the judicial review of the government’s net zero strategy, Mr Justice Holgate found⁴ that the strategy did not meet the requirements of the Climate Change Act 2008. In particular, it did not set out the contribution of the various policies within it on meeting the overall 6th Carbon Budget, and the timing of their impact. The reduction in road transport emissions is one such policy and the impact of the project on the potential for achieving the required reduction is clearly an important consideration for the Secretary of State in the re-determination. Accordingly, it is essential that NH provides the necessary information for his assessment.

¹ Stonehenge Alliance “Transport, Carbon and Economic Issues - Response to Secretary of State’s call for further representations on his Statement of Matters Bullet Points 2–4 and Environmental Review Appendix: Transport Assessment Review”, April 2022

² Stonehenge Alliance “Updated Carbon Issues - Response to Secretary of State’s call for further comments on the Applicant’s updated information on carbon”, June 2022

³ Department for Transport “Decarbonising Transport: A Better, Greener Britain”, July 2021

⁴ Friends of the Earth et al v. Secretary of State for Business, Energy and Industrial Strategy, 18th July 2022

2.3 Accordingly, the Stonehenge Alliance is strongly of the view that extensive further work is required by NH to remedy these defects in its assessment.

3. Traffic Modelling

3.1 NH re-states its position that its most recent traffic forecasts that it presented in January 2022 provide a robust assessment of future traffic levels and the impacts of the A303 Stonehenge project. There are two fundamental problems with this approach.

3.2 Firstly, the scenario it has chosen as its central case assumes that the cost of motoring falls due to the switch to electric vehicles and that the government does not replace the fall in tax revenue from reduced use of petrol and diesel by any other transport tax. Since NH continues to develop and promote highway investment schemes, and the central case scenario does not allow for the effects if this shortfall were compensated by other transport spending, this implies that it assumes the shortfall will be made up from increases in other taxation, or further cuts in spending, in other sectors of the economy. The scenario NH has used is perhaps helpful to the Department for Transport (DfT) and Treasury in understanding the scale of revenue shortfall and in designing alternative tax mechanisms, but it is implausible as an analysis of what is likely to happen. We note that the Transport Select Committee has recommended that road user charging should be introduced as a way of addressing the potential tax shortfall. This would increase motoring costs and result in traffic growth being lower than forecast by NH. There has not even been passing attention to the effects of this as an alternative scenario for appraisal.

3.3 The transition to electric vehicles is expected to occur over many years with sales of new exclusively fossil fuelled cars not ending until 2030 and hybrid ones five years later under current government policy. This means that surviving fossil fuel vehicles, a significant proportion of the vehicle fleet, will continue to use fossil fuels at least into the 2040s, even in the scenario adopted by NH. In this context it is worth noting that current fuel prices had already risen above the level in DfT's "high fuel price, low economic growth" scenario before Russia's invasion of Ukraine. They are now very much higher and this can be expected to reduce traffic growth further as will the fact that car ownership has fallen since 2019⁵.

3.4 Accordingly, the forecast level of traffic growth is implausible both because it is based on an unrealistic scenario of future vehicle taxation and because it assumes much lower fuel prices than existed even before the outset of the war in Ukraine. It also ignores the fall in car ownership since 2019, and is based on uninterrupted increases in economy-wide real incomes at levels which are not compatible with current experience of inflation, economic growth, and policy on real wages, taxation and social benefits. In consequence it overstates future congestion levels and artificially increases the notional benefits of the project in reducing the growth in congestion.

3.5 The second problem with NH's approach is that it is inconsistent with DfT's Transport Decarbonisation Strategy⁶ and wider government policy on achieving net zero. As we discussed

⁵ Centre for Research into Energy Demand Solutions "Less is more: Changing travel in a post-pandemic society", section 1.4, March 2022

⁶ Department for Transport "Decarbonising Transport: A Better, Greener Britain", July 2021

in our April submission, government policy is directed towards encouraging transfer to more sustainable modes and reducing the need to travel. NH traffic forecasts implicitly assume that these policies will either not be implemented or will fail. The recent judicial review highlighted the requirement for the government to set out clear targets for policies such as road transport decarbonisation and to monitor the effects of its decisions on its ability to meet them, where necessary taking corrective action.

- 3.6 Linked to this, the Climate Change Committee, by whose advice the judge laid great weight, has highlighted the importance of reducing traffic now⁷, for the wide range of benefits it will bring, and most important the ability to offer immediate emissions reductions while the fleet is transitioning to zero emission vehicles. This suggests that rather than just following future traffic projections the Government needs to be actively managing demand for road space to control emissions. It makes no sense to accept this in policy while ignoring it in appraisal.

4. Business Case

- 4.1 The Stonehenge Alliance regards the business case for the project as being very important to the determination of the draft Development Consent Order (DCO), for two reasons. Firstly, it seeks to quantify many – though not all – of the impacts of the project in consistent monetary terms. These impacts can then be assessed, alongside other critical impacts which cannot be monetised as part of the overall planning assessment. Secondly there is little point in approving a project with a poor business case, which has little chance of being funded.
- 4.2 Accordingly, we are pleased that National Highways has now published an updated business case. We note that this is the first update of the business case that has been published since the version that was submitted as part of the draft DCO application in 2018⁸. The fact that NH has now published it somewhat undermines its repeated assertion that it is not relevant to the draft DCO determination.
- 4.3 The Stonehenge Alliance is surprised that the new business case shows a marked increase in the claimed Benefit: Cost ratio (BCR) of the project, from 1.08 to 1.55, compared with the 2018 version. Even so, this is only just sufficient to move the project from the “Low” to “Medium” value for money category⁹. It would only require a £32 million increase in costs or £48 million reduction in benefits for it to revert to the Low value for money category.
- 4.4 The change in the BCR is the result of a reduction in the assumed costs and an increase in the alleged positive impacts of the project. The reasons for these changes are only described briefly in the document and we do not consider that they are robust or reliable. We reproduce the table from NH’s document below, together with the percentage change from the previous version. We then comment on each row in the table in the succeeding paragraphs.

⁷ Climate Change Committee “2022 Progress Report to Parliament”, pages 114, 144-145, 575, June 2022

⁸ Highways England “Case for the Scheme and NPS Accordance”, 2018

⁹ Department for Transport, “Value for Money Framework”, 2015

Table 1: Comparison of 2018 and 2022 Business Cases (£m, 2010 prices)

Heading	2018 Business Case	2022 Business Case	Percentage Change
Costs¹⁰			
Capital cost	970	858	-12
Operation and maintenance	235	101	-57
Total cost	1,206	959	-20
Benefits			
Economic efficiency of transport system	252	294	+17
Indirect tax revenues	87	45	-48
Accident benefits	4	2	-50
Increase in pollution	-86	-124	+44
Journey time reliability benefits	61	142	+137
Wider economic impacts	35	172	+390
Value of removing road from WHS	955	955	0
Total Benefits	1,307	1,486	+14
Benefit: Cost Ratio	1.08	1.55	

- 4.5 National Highways attributes the cost reduction to “the application of revised inflation rates as confirmed with the ORR for the Road Investment Strategy 2 portfolio, together with the removal of historic sunk costs as directed by government guidance.” The Stonehenge Alliance has not seen any evidence to explain what “sunk costs” have been removed and the rationale for doing so. Nor have we seen what allowance NH has made for future development costs, prior to the start of construction. The revised inflation rates may have some impact on the capital costs of the project but appear to be much more important for operational and maintenance costs, which account for the majority of the assumed cost reduction. The inflation forecasts agreed with ORR appear to date from 2019 and were prepared prior to the UK’s exit from the European Union, the COVID pandemic (with its resulting impacts on supply chains) and the war in Ukraine. All these factors have affected construction industry cost inflation significantly.
- 4.6 We acknowledge that the appraisal has been undertaken in “real” 2010 prices and general inflation is excluded. Nonetheless, several of the inputs to construction industry costs have been particularly heavily affected and there is considerable uncertainty about future cost trends, which may result in construction inflation being well above overall inflation in the economy. This means that basing future construction industry inflation assumptions on estimates prepared in 2019 is no longer realistic or credible. Accordingly, the Stonehenge Alliance is not convinced that the assumed cost reduction is credible and believes that new cost estimates should be prepared using up to date prices and forecasts of inflation. Prima facie, it would be more credible to assume increased construction costs, not reduced costs.

¹⁰ National Highways “Response to the Secretary of State’s Consultation of 20 June 2022 - 4.1 Applicant’s response to the request for comments Q1, Q3–Q6 – Response document”, paragraph 3.3.13, page 10, July 2022; Highways England “Case for the Scheme and NPS Accordance” [APP-294], Tables 5-5 & 5-6, page 5-24, October 2018; and National Highways email from Saima Nazir (Correspondence Manager, Complex Infrastructure Programme) setting out 2022 capital investment and operation, maintenance and renewal costs, 1 July 2022

- 4.7 The transport economic efficiency benefits have increased, presumably as a result of the revised traffic modelling discussed above. As previously noted this is based on an unrealistic scenario where a rapid growth in electric vehicles results in lower operating costs leading to higher traffic volumes. It assumes that government takes no action to replace the loss of tax revenue from fuel sales, and that there is no effect on the business case of measures to constrain the growth in traffic volumes in line with the DfT's own Transport Decarbonisation Plan.
- 4.8 The effect of these unrealistic assumptions is shown in the indirect tax revenue row of the table. Despite NH's latest forecast assuming a greater increase in traffic than previously, the amount of tax revenue is nearly 50% less than before. This is presumably because, on average, the tax generated per vehicle mile is much lower so that the total tax raised is less despite more vehicle miles being generated. The implicit assumption is that government replaces taxation on fuel with tax rises outside the transport sector.
- 4.9 Reduction in road traffic accidents was never a major benefit of the A303 Stonehenge project, despite NH giving it significant attention as an issue. It now states that the already low benefits have reduced by 50% and now contribute less than 1/700th of the alleged benefits of the project. It does not explain why this is the case.
- 4.10 The negative impacts of emissions have increased by 44% relative to the previous business case. This is a relatively small increase given the much greater uplift in the valuation of the negative impact of carbon emissions and the fact that NH is now forecasting more traffic growth from the project than before. This may reflect the assumption of much faster electrification of the vehicle fleet. However, no explanation is provided to confirm this and, as noted above, the traffic forecasting assumptions are themselves unrealistic and not consistent with the Transport Decarbonisation Plan.
- 4.11 The claimed journey time reliability benefits have more than doubled in the updated business case. Some increase seems to arise from the NH change - unrealistically - to forecasting more congestion in the Do Minimum scenario than before. However, it also claims to have based its revised assessment on new software. No details of this are available and the increase is surprising given that NH previously devoted considerable effort to their assessment of journey time reliability impacts. During the Examination, the Stonehenge Alliance questioned the validity of this assessment¹¹. We are even less confident that the new assessment is reliable and it is important that all parties are able to scrutinise it. As we have stated previously, this sort of scrutiny would be best done in a re-opened Examination.
- 4.12 Even more surprising is that NH has increased their estimate of the wider economic impact benefits by more than 390%. It says this is due to "a broader geographic scope for appraising wider economic impacts to consider the benefits of improved access for the South West to London and the South East". It is very hard to understand how the work that NH did for the draft DCO Application was so deficient that it could lead to such a big underestimate of the wider economic impacts. This is important not only to the business case, but also the wider planning assessment of the project. NH's explanation is completely inadequate to explain the

¹¹ Stonehenge Alliance "Written Representation – Transport Planning and Economic Issues" Section 3.4, 2019

increase and much more detail is needed on the changes that have been made. We note also that 'wider economic effects' using the TAG framework may be either negative or positive (ie they are not only benefits, but may be extra costs). The formal statement of whether they are negative or positive is given in the SACTRA (1999) Report¹² where it is explained that the case where wider economic effects are negative will include that where the marginal external costs of congestion (or environment, etc) are not charged to the vehicles causing them, which is precisely the effect of the assumption that fuel cost reductions are not offset by road user charging or similar. Therefore, this item ought to be a reduction in benefits, not an increase.

4.13 It is worth recalling that the National Audit Office stated¹³:

"...the project can only create a high-quality route to the South West and unlock the full growth potential in the region in combination with the seven other projects identified by Highways England as necessary to upgrade the A303/ A358"

and

"If it does not complete all eight projects, the Department will struggle to deliver all of the strategic objectives for the Amesbury to Berwick Down project."

Therefore, this casts further doubt on National Highways suddenly finding an increase in benefits over a wider geographical area.

4.14 We note that the value attributed to "removing the road from WHS" is the same as in the previous business case. The whole business case depends upon attributing £950,000,000 as a benefit from removing the A303 from the WHS. This is, of course, an inaccurate description of the project, which does not remove the A303 from the World Heritage Site and instead places it underground for only part of its route across the site and involves the placing of a new, wider road in parts of the WHS. As the Stonehenge Alliance has shown previously there are serious issues with the reliability of the survey on which the valuation is based including in our Written Representation on the survey¹⁴.

4.15 As we noted in our April comments¹⁵, the figure of £950,000,000 is also based on an implicit assumption that the project causes a benefit to the historic heritage of the site. This view has been rejected by the World Heritage Committee, the Infrastructure Planning Inspectorate and by the Secretary of State himself. That the Secretary of State found that there would be harm overall to the WHS (i.e. even when the benefits were taken into account) is recorded at paragraph 282 of the High Court Judgment. To include the monetisation of 'removing' the existing A303 without including a figure for the harm which inserting a new road into the WHS would cause is patently irrational and is not a sound basis upon which to present a business

¹² SACTRA (1999) Transport and the Economy, Department for Transport.

¹³ National Audit Office "Improving the A303 between Amesbury and Berwick Down" 20 May 2019

¹⁴ Stonehenge Alliance "Written Representation on Cultural Heritage Value Report" 2019 (REP2-130)

¹⁵ Stonehenge Alliance "Transport, Carbon and Economic Issues - Response to Secretary of State's call for further representations on his Statement of Matters Bullet Points 2-4 and Environmental Review Appendix: Transport Assessment Review", April 2022

case. Once the overall harm to the WHS is recognised the BCR for the proposed scheme would inevitably be less than one, costing far more than it would ever produce in benefits.

- 4.16 We also note that the alleged benefit is identical to the previous business case despite the assumed opening year, when any “benefits” would be realised, being put back by 3 years. We would expect that the process of discounting the benefits back to 2010 from a date further in the future would result in a reduction in its monetary value. In addition, it is not clear how the value that people place on seeing the stones of Stonehenge as they travel to and from the South West has been properly assessed. This would be lost with a tunnel and therefore represents another cost.
- 4.17 In summary, NH has introduced many changes in their updated business case with little or no explanation of how they have been derived. In some cases, Stonehenge Alliance considers they are based on unrealistic assumptions, while in others we do not have sufficient information to make a full assessment. We consider that it is essential that the Examination is re-opened so that NH’s evidence can be presented and reviewed by all parties. Without access to this information, it is impossible to see how the Secretary of State could make a new decision.

5. A wider setting – cumulative impacts

- 5.1 In response to the Stonehenge Alliance’s call for a combined Business Case and Strategic Environmental Assessment which should have been carried out for all projects on the A303/A358 corridor, in its latest submission¹⁶ National Highways says that:

“It would therefore not be appropriate to provide combined documents for separate projects at different stages of the investment lifecycle. Moreover, our approach to uncommitted projects is consistent with the DfT TAG Uncertainty Log. Projects potentially committed to in DfT’s Road Investment Strategy 3, or later road investment strategies, are considered hypothetical, and therefore have not been included in the A303 Scheme assessment.”

- 5.2 Yet it would appear that National Highways wants to have its cake and to eat it. Aside from the A303 Sparkford to Ilchester scheme which is under construction, the A358 Taunton to Southfields project is close to having its draft DCO submitted. In addition, throughout its Statement of Case¹⁷ there are numerous references to improving travel to the South West, including within the objectives for the scheme as set out in paragraph 2.8.2. Objectives a and b, the most relevant, are reproduced here:

“a. Transport – To create a high quality reliable route between the South East and the South West that meets the future needs of traffic.

¹⁶ National Highways “Response to the Secretary of State’s Consultation of 20 June 2022 - 4.1 Applicant’s response to the request for comments Q1, Q3–Q6 – Response document”, paragraph 3.3.15, page 11, July 2022

¹⁷ Highways England “Case for the Scheme and NPS Accordance” [APP-294], October 2018

b. Economic growth – To enable growth in jobs and housing by providing a free-flowing and reliable connection between the South East and the South West.”

- 5.3 In paragraph 5.3.9, NH goes further to explicitly state that this is just one scheme amongst eight that the Government has committed to upgrade by 2029. Paragraphs 5.3.9 and 5.3.10 are reproduced here:

“Part of an upgrade to the SRN, providing wider productivity benefits

The Scheme is an integral part of the longer-term corridor improvements to create a high performing dual carriageway route between London and the South West. Within the RIS the Government has committed to the upgrading of the A303-A358 corridor by 2029. The A303 Amesbury to Berwick Down Scheme is one of three schemes being currently progressed, with five further schemes to follow in coming road investment periods.

The expected increase in Gross Domestic Product (“GDP”) due to the Scheme is greater with other corridor improvements in place than for the Scheme in isolation (Table 5-4).”

- 5.4 This clearly demonstrates that the scheme is part of a programme of upgrades and therefore a combined assessment of the full impacts of the schemes should be properly drawn up. It is far more than just hypothetical, or it would not be mentioned in the Statement of Case, or as part of the Government’s Road Investment Strategy. It should be noted that RIS3 is less than 3 years away, while the opening of the A303 Stonehenge scheme, should it be approved, would not be until 2029, close to the start of the RIS4 period. Therefore, there is a need to assess this scheme both in isolation and with the wider programme of upgrades to properly assess the cumulative impacts that they will have. Without this wider and cumulative assessment, the scheme cannot have a sound Environmental Statement or conform to the Environmental Impact Regulations.
- 5.5 As it stands, if the A303 Stonehenge scheme progresses in isolation, it will merely hasten the speed at which the traffic arrives at the next bottleneck. This and the remaining bottlenecks on the A303/A358 corridor will most likely suffer even worse congestion than they do at present as a result of the extra traffic drawn to this corridor by this scheme, undermining the time savings and benefits being attributed to it.

6. Alternatives

- 6.1 Stonehenge Alliance has consistently argued that NH has discarded options that avoid the World Heritage Site, or do not involve major new road construction, on the basis of inadequate evidence. Our position was set out in various documents during the Examination including our

Written Representation and Transport Planning and Economic Issues¹⁸ and our Comments on Responses to Examining Authority's Questions Submitted by Deadline 2. In its latest submission, NH has provided no new information to support its position and instead has referred to previous submissions made prior to and during the Examination, together with its initial Redetermination submission on Alternatives. The latter provided only minimal updating of its position at the Examination.

- 6.2 Stonehenge Alliance considers that the position we put forward at the Examination was robust. However, irrespective of this, the situation has changed in two important respects since that time. Firstly, the Examining Authority and the Secretary of State both agreed that the proposed project would cause major harm to the historic heritage of the World Heritage Site (WHS). Secondly, the 6th Carbon Budget and the Transport Decarbonisation Plan have highlighted the importance of developing options that reduce, rather than increase, road traffic. This is reinforced by the recent Net-Zero judgement and the advice to Government by the Climate Change Committee as mentioned in paragraph 3.5. Alternatives which avoid impacting on the WHS by going beneath its full width, or around it, would address the first of these issues, while non-road alternatives would address them both. They are discussed in turn below.
- 6.3 In his conclusions on the Judicial Review of the Secretary of State's decision to approve the DCO, Mr Justice Holgate concluded that the Examining Authority had failed to adequately consider alternatives to the proposed scheme given its finding that it would cause significant harm to the historic heritage of the WHS. In simply accepting the Examining Authority's view, the Secretary of State also failed to consider alternatives. Although the arguments during the Judicial Review related principally to longer tunnel options, they are also relevant to other alternatives.
- 6.4 An option which tunnelled beneath the whole of the WHS and most of the options that avoided it completely were discarded at an early stage of the appraisal. In the case of the option of tunnelling across the full width of the WHS, this was rejected on the basis of cost and there was no proper assessment of whether there were extra benefits which would outweigh the additional expenditure. The decision to drop this alternative appears to be premature given what is now known about harm to the historic heritage from the proposed scheme. It should be noted that this option is different from the longer tunnel options that were mentioned by NH at the Examination, or those that were produced subsequently. These extend the proposed tunnel at its western end, to various degrees, but have the same harmful impact on the eastern side of the WHS as the proposed scheme
- 6.5 One option, F010, which skirts the WHS to the south was subject to slightly more appraisal than the longer tunnel options mentioned at the Examination. It was found that it had a similar or better Benefit: Cost Ratio to the tunnel options being considered at the time. The Technical Appraisal Report¹⁹ contains an interesting table which compares it with the tunnel options in relation to the client's requirements. This assessed the options on a 3 point scale where "3"

¹⁸ Stonehenge Alliance "Written Representation – Transport Planning and Economic Issues" Section 4, 2019 (REP2-129). See also Stonehenge Alliance "Comments on Responses to Examining Authority's Questions Submitted by Deadline 2" Section 3, 2019 (REP3-063)

¹⁹ Highways England "Technical Appraisal Report, Volume 1", 2017 (REP1-031)

represents strong alignment with the requirements, “2” moderate alignment and “1” weak alignment. Table 9-1 is reproduced below (D061 and D062 are the tunnel options):

Client Requirement	D061	D062	F010
Transport: to create a high quality route that resolves current and predicted traffic problems and contributes towards the creation of an Expressway between London and the South West	3	3	2
Economic growth: in combination with other schemes on the route, to enable growth in jobs and housing by providing a free flowing and reliable connection between the East and the South West peninsula	3	3	2
Cultural heritage: to contribute to the conservation and enhancement of the WHS by improving access both within and to the site	2	2	3
Environment and community: to contribute to the enhancement of the historic landscape within the WHS, to improve biodiversity along the route, and to provide a positive legacy to communities adjoining the road	3	3	2

- 6.6 It is questionable that Option F010 should be given a lower rating on the transport and economic growth criteria on this simple scale, given that it would provide a similar high capacity dual carriageway route. The main difference is a slightly longer journey time (estimated by NH as 1.25 minutes), which is of little significance in relation to the longer distance journeys made on the route. The finding that the proposed route would cause “significant harm” to the historic landscape of the WHS means that the rating of the tunnel options on the Environment and Community criterion is invalid and should be “1 – weak alignment” at best. This would lead to a different conclusion on which option should be progressed.
- 6.7 Despite the damning conclusions of the ExA and Secretary of State as to the impact of the proposed scheme on the WHS, NH has continued to fail to produce sufficient information for the southern bypass route (which avoids any direct damage to the WHS) to be properly assessed. This is particularly egregious in circumstances where it relies upon cost as a reason to reject longer tunnel options (the bypass being substantially cheaper). Rather than giving any serious consideration to the obvious alternative which is the southern bypass NH continues to rely upon its cursory assessment conducted in 2017. This is a wholly inadequate evidential basis for the Secretary of State to be able to conclude that the southern bypass is not a preferable alternative.
- 6.8 NH’s brief and superficial assessment of non-road options started by setting up a requirement that any option would need to transfer 36,000 people per day onto an alternative mode. This was based on reducing the volume: capacity ratio on the A303 to 0.53 as in the proposed project. This is a much greater reduction than would be needed to resolve congestion issues as the scheme provides more capacity than will be needed for many years, even on NH’s flawed forecasts. NH’s consultants then undertook a very simplified assessment and concluded that rail-based solutions would potentially have the greatest impact, but that no single intervention could achieve the level of transfer they considered to be required. This forms the basis for NH’s rejection of non-road alternatives.

- 6.9 There are several reasons why NH's approach is invalid, including:
- (i) the level of transfer required to reduce the volume: capacity ratio to a level where congestion is no longer a significant issue is much lower than NH claims;
 - (ii) as discussed above, NH's traffic forecasts are flawed and based on an implausible scenario about the future. They are also inconsistent with the Transport Decarbonisation Plan which aims to reduce car traffic relative to a business as usual scenario;
 - (iii) while it is probably correct that rail can make the greatest contribution to reducing traffic on A303, bus and active travel solutions would also have some impact, further reducing the level of transfer to rail required, and/or increasing the impact of rail interventions;
 - (iv) there are two parallel rail routes to the A303 between London and Exeter via Salisbury and Westbury respectively. Both are proposed for electrification under Network Rail's Traction Decarbonisation Strategy²⁰. They serve different intermediate communities and also play different roles, with the Westbury route being the primary intercity passenger route to Exeter and beyond while the Salisbury route caters more for journeys to and from towns between Salisbury and Exeter. Each could contribute to reducing flows on A303; and
 - (v) they only consider potential transfer from A303 at Stonehenge. A public transport alternative would also have benefits for other travellers who do not currently use the A303.
- 6.10 The approach adopted by NH was flawed and inadequate when the work was undertaken in 2017. In view of policy and other changes since that time it is now completely unsustainable and non-road options should be considered further.
- 6.11 The finding that the proposed solution would cause significant harm to the historic heritage of the WHS is so important as to invalidate an option selection process that assumed that this would not occur and makes it necessary to reconsider alternatives that were dismissed at an earlier stage. Revised government policy since the original draft DCO application, including the 6th carbon budget and the Transport Decarbonisation Strategy means that this should extend beyond road-based solutions and consider public transport and demand management alternatives.

7. Concluding Comments

- 7.1 The Stonehenge Alliance is concerned that NH is not engaging with many of the points that we have raised in our submissions and has restricted itself to re-stating its previous positions on carbon, traffic modelling, cumulative impacts and alternatives, despite many flaws and inadequacies in its assessments.
- 7.2 It is welcome that NH has provided an updated business case for the project. However, it has not provided an adequate explanation for many of the changes that it has made, nor for

²⁰ Network Rail "Traction Decarbonisation Network Strategy: Interim Programme Business Case", 2020

retaining the unsound “benefit” of allegedly “removing the road from WHS” which continues to account for the majority of the claimed benefits.

- 7.3 As the Stonehenge Alliance has argued previously, the proposed project is so flawed, and its negative impacts are so great, that the Secretary of State should refuse the Development Consent Order. This is in considerable part due to a failure to take account of and assess the scheme against the latest Government policies. Also, the negative impacts of the proposal outweigh its benefits. DfT officials, working with relevant agencies including NH, should be requested to bring forward alternative solutions to address transport problems in the London to South West Peninsula corridor.
- 7.4 If the Secretary of State is unwilling to reject the draft DCO at this stage, the Application should be referred back to the Infrastructure Planning Inspectorate for further Examination, with a brief to engage fully with those who have made a critique of the technical, economic, environmental, heritage and logical underpinning of NH’s case, in the light of the major changes that have occurred since 2019, and to properly consider alternatives.
- 7.5 Finally, we note that the timing of this reapplication is seriously flawed. Brexit, Covid and Climate Change are already apparent as having major potential impact on all traffic forecasts and transport needs for the rest of this century, and the DfT is in the middle of a major review of the underlying policy statements and appraisal methods – as indeed are Treasury, BEIS, DEFRA and other relevant departments. To seek a major commitment to a rejected scheme, based on unjustified adjustments to an appraisal inherited from the late 2010s, is unnecessary and with a very high downside risk. It has the feel of a manufactured urgency to try and get the scheme through before its appraisal base becomes weakened even further. If, however, the Secretary of State considers that there is a case to carry forward, it absolutely must be on the basis of a full Examination, and a proper resubmission of revised appraisal with full technical justification, open, as previously, to challenge.