

M3J9

Concluding Submission

Winchester Action on the Climate Crisis

10 November 2023

Table of Contents

1	Summary	1
2	A lack of useful response by the applicant	2
3	Zero Growth, Negative Benefit : Cost Ratio	2
4	Minimal Improvements	3
5	Obscure, Crude and Irrelevant Climate Calculations	4
6	Ignoring of Guidance	5
7	Appraising Alternative Modes	5

1 Summary

The applicant has failed to respond helpfully to points made by WinACC and questions raised by the Examining Authority. As a result there is still insufficient information to enable a good decision on this proposal

Now that there is Zero Growth in the UK, even by the applicant's calculations there is a negative BCR

The applicant has failed to demonstrate more than minimal benefits from the proposal.

The climate calculations are inadequate and suggest very poor outcomes.

The applicant has failed to demonstrate they have followed guidance.

There is no evidence that alternative modal solutions have been appraised, or that the applicant has the skills or knowledge to do so.



2 A lack of useful response by the applicant

At each stage of this enquiry we have asked for the applicant to show greater transparency about the evidence they have provided and to add significant supporting detail. We believe the Examining Authority have not been provided with sufficient information to be in a position to advise the Secretary of State on how to proceed.

The applicant has failed to engage in a number of ways. They have:

- Repeated earlier assertions in response to points raised without providing any new arguments to support their assertions
- Not provided additional information about the data they are relying on, or the rationale behind their choice of data
- Quoted back sections of the application about which questions have been asked without directly addressing the issues behind the questions
- Claimed, against all normal good practice, that this individual proposal does not have to comply with broader policies and strategies (including the Solent to the Midlands Route Strategy, government March 2023 domestic transport emissions targets up to 2050)
- Referred to work done that subsequently cannot be located, or whose impact cannot be demonstrated
- Referred to court cases that do not appear to have any relevance
- Suggested that any difficult questions (such as the excessive emissions the modelling predicts) are not for the Examining Authority, but for the Secretary of State to resolve, thereby nullifying the role of the inquiry to advise the Secretary of State.

It is impossible to know whether this lack of helpful response is deliberate, or the result of a fundamental lack of capacity to respond. Whether it is either of these, or a combination of both, we believe that the Examining Authority have not been given sufficient appropriate information to decide on whether the proposals should go ahead, although there are significant indications that the proposals will cause great harm and bring little benefit.

3 Zero Growth, Negative Benefit : Cost Ratio

On 10 November 2023 it was announced that the UK had experienced zero growth in the third quarter of 2023. The news was greeted with relief in that economists had expected negative growth. The expectation is that there will be little change for some time. This suggests that the relevant figure offered by the applicant on BCR is the 0.98 low growth BCR in para 5.9.7 of the applicant's document 7.10 Combined Modelling and Appraisal Report (REP1-026). Arguably **zero** growth should be even lower than **low** growth. Unadjusted costs are likely to be higher now than unadjusted benefits. Since the applicant has failed to

provide information on the detail and assumptions behind the adjustment to BCR, we cannot assume the adjustment is robust. We know, for example that PM_{2.5} pollution was not included in the adjustment. We will believe that benefits are likely to be less than the cost until the applicant is able to provide a convincing and credible explanation of how the calculations have been adjusted. Even then, the adjustment suggests a very low level of economic benefit.

Present Value of Benefits (PVB)		420.20110.71	464.74152.25	208.64199.02
		71	25	02
Costs	Operating and Maintenance		7.69	
	Construction		105.02	
Present Value of Costs (PVC)		112.71		
Net Present Value (NPV)		7.49-2.00	49.0339.54	96.8086.31
Benefit to Cost Ratio (BCR)		4.070.98	4.441.35	4.861.77

5.9.5 The PVB (Level 1) was £420.20110.71M and £208.64199.02M for the Low and High scenarios, respectively, compared with £464.74152.25M for the core growth scenario. The associated adjusted PVBs (Level 2) were £460.47150.98M and £252.20242.71M compared with £203.58194.09M for the core growth scenario.

5.9.6 The NPV (Level 1) was -£7.492.00M and £96.8086.31M for the Low and High scenarios, respectively, compared with £49.0339.54M for the core growth scenario. The associated adjusted NPVs (Level 2) were £47.7638.27M and £139.49130.00M compared with £90.8781.38M for the core growth scenario.

5.9.7 The Initial BCR was 4.070.98 and 4.861.77 for the Low and High scenarios, respectively, compared with 4.441.35 for the core growth scenario. The associated Adjusted BCRs were 4.421.34 (low) and 2.242.15 (high) compared with 4.841.72 for the core growth scenario.

5.9.8 The graph in Figure 5-6 presents the predicted 60-year profile of user benefits for each scenario.

4 Minimal Improvements

In our earlier submissions, we have listed the minimal nature of the improvements the applicant tells us this scheme will deliver. We list here briefly our earlier references to a few of the unimpressive improvements the applicant claims:

- Only 0.36% of the journey time for an HGV from Southampton Western Docks to Trafford Park Euro Terminal would be reduced by the proposal (REP6-035 section 16)
- The proposals will bring about a minimal increase in traffic volumes of only 2.86% (REP1-038 section 3)
- In 2047 Journey time savings on journeys across M3J9 will average only 30.3 seconds, a mere 7.9% of the DM journey times on the routes in the sample (REP1-038 section 3).
- In 2027 % reduction in journey times across Winchester will only be 10% on average time-saving and only 56 secs in time (REP1-038 section 3). The applicant has described averaging journey-time savings as 'crude' but has not suggested a more sophisticated way of aggregating complex data patterns and inaccurately quoted outlier maximum time savings.

5 Obscure, Crude and Irrelevant Climate Calculations

The applicant is especially incoherent about the climate impact of the proposals. They appear to believe that an appendix containing two figures is sufficient to demonstrate the proposals will not have a harmful impact. Sadly and worryingly The minimal amount of data they provide as a result of their calculations tells us:

On Page 26 of [Rep2-028](#) in table 14.6 the applicant gave the following figures

Operation Year	End-user Emissions (tCO ₂ e) –		
	DM Scenario	DS Scenario	Difference
2027	4,157,875	4,161,194	+ 3,319
2042	3,549,335	3,554,026	+ 4,691

We subsequently learned that these were emissions projections for a vast area in the rectangle between Marlborough, Christchurch, Worthing and Chertsey. The applicant has not explained why they think this area is remotely relevant. In Section 10 of REP6-035 we set out how wrong we think the applicant is, and how the calculated emissions increase cannot be accepted because it will jeopardise the government's whole Net Zero Development Plan. We believe the scale of this error demonstrates just how little the applicant understands about the need to cut emissions and how essential it is to require the applicant to produce relevant climate calculations, taking into account only roads where the applicant can demonstrate an impact from the scheme. The applicant has ignored our attempts to engage on this.

We worry that this unnecessarily, and inappropriately wide area has been chosen because it will suggest that the increase in emissions from this scheme will appear relatively small. This could be described as 'gaming' with the data, and we suggest this should not be accepted.

6 Ignoring of Guidance

We set out in some detail in REP1-038 Section 6 the elements of guidance we believe the applicant has failed to comply with.

In particular, there is nothing the applicant has said to reassure us that the applicant has not used the same geographic area for traffic modelling and climate modelling.

As we say above the climate modelling area is unjustifiably enormous. There is no evidence that traffic modelling has been carried out in any meaningful way across the whole area. Our view is that neither modelling would be relevant in such a wide area.

The applicant has suggested that since the effects of GHG pollution are felt globally, the modelling of the causes of GHG pollution should not be local to the proposal. We believe this demonstrates the profound failure of the applicant to understand the global heating threat, and is witness to the inadequacy of the work the applicant has done. The analysis of the **causes** of global heating has its own logic and geography and has no necessary shared characteristics with the **effects** of global heating.

In short we believe that the analysis of the climate impact of the scheme is deeply flawed, and needs to be abandoned and replaced with a new, more transparent, and more appropriate piece of work.

7 Appraising Alternative Modes

The applicant has failed to demonstrate that they have followed guidance by appraising proposals for alternative modes. The belated **rush job** submitted in REP5-027 demonstrated all too clearly a failure by the applicant to understand the Examining Authority's request, and the lack of the applicant's ability to perform an appraisal of a rail freight alternative as we set out in REP6-035.