

ADDENDUM

Following the drafting of the above response to the consultation process, representatives of Winterbourne Stoke and Shrewton Parish Councils and the Berwick St James Parish Meeting, met with Mr Derek Parody, Project Director for Highways England and Chris Jones, the stakeholder lead for the Arup/Atkins Consortium on 23rd February 2017. The purpose of this was to discuss and perhaps clarify some of the issues of concern. We very much appreciate the intercession of Mr John Glen MP, in calling for this opportunity

Highways England presented a limited dataset, for a single pollution indicator (NO₂). None of the data locations sampled lay any distance (more than 10 metres?) to the north of the current route of the A303. This unfortunately fails to capture the impact of the prevailing wind on the existing situation and calls into question the objectivity of the sampling undertaken. The data presented did show a minor trend that data points to the south of Winterbourne Stoke had levels of NO₂ slightly lower than those further north. That said, the approach to pollution modelling used is archaic and does not reflect the state of the art or the current views on pollutant risk. Whilst looking at single pollution indicators may have been acceptable in the past, it is less so today, with the emphasis being on both gases and particulates such as PM10 particles. The model used does not reflect terrain channeling, changes in surface roughness, or even basic meteorology and as a consequence seem hard to defend as being fit for purpose.

Highways England/Arup Atkins finally presented their noise predictions for sensitive receivers near the proposed routes, based on the use of CRTN. Whilst Highways England were very insistent that the CRTN process was followed, their interpretation of what was required appeared somewhat minimalist. For instance, the blocking of noise by buildings (facade effects) were omitted. Although these can be modelled in the CRTN methodology, it was ignored in this instance. This is likely to have distorted the noise predictions quite considerably. There were several other aspects of the use of CRTN which were questionable. The most concerning of these was the fact that no field sampling baseline data was collected in order to enable the modelling to be sanity tested and calibrated.

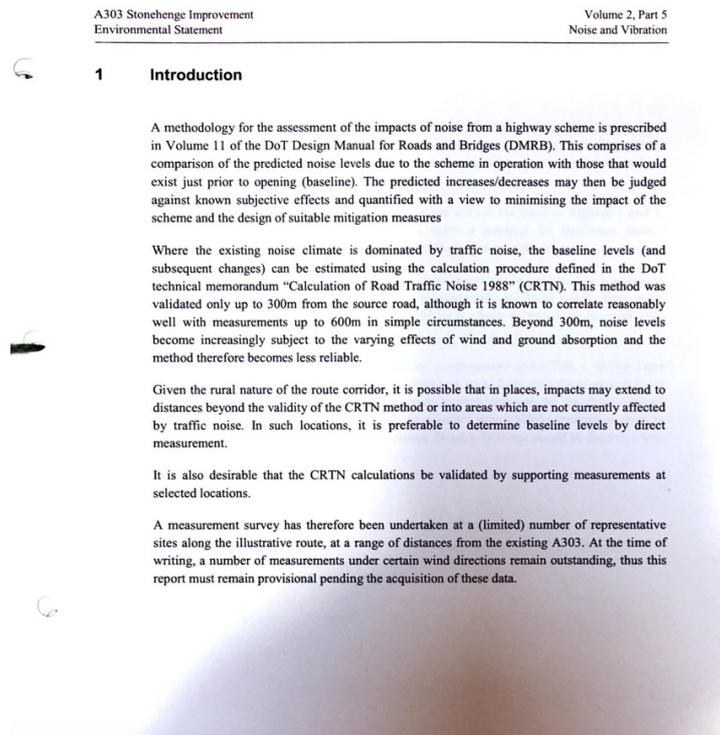
Worse still, no real attempt seems to have been made to make use of historical sampling data that could, in the very least, have assisted in this very purpose. Worryingly, for what is a company wholly owned by a Government department, Highways England claimed to no longer have a copy of the Environmental Impact Assessment conducted for the previous scheme in 2003, and which had been commissioned by their predecessor organisation at public expense. This claim alone should raise concerns. Needless to say, we were able to locate a publicly available copy of the EIA in a matter of a few minutes; a copy that would have been accessible to Highways England had they sought it. This calls into question the due diligence of Highways England and its contractors in seeking historic, but still valuable, data.

Highways England have refused to allow us to have a digital copy of the data they presented to show to our parishioners, on the grounds that neither we, nor the public, would be able to interpret the information "in context". We find that claim both condescending and insulting; particularly as two of those attending had a professional background in relevant scientific disciplines. There was a secondary claim that the information could not be released as we were "being given privileged access". We find this reaction quite perverse as many organisations and stakeholders had asked for and should have been provided with, the same information we were seeking. We pointed out to Highways England that, as government-owned company they were covered by the Government Chief Scientific Advisor's Universal Ethical Code. Surprisingly, Highways England denied that this was the case. Whilst not mandatory, adherence to the code would be regarded as best practise to encourage active reflection among scientists and engineers on the implications and impacts of their work and to support communication between scientists/engineers and the public on complex and challenging issues. In other words, if Highways England genuinely believe that it was too difficult for anyone outside their organisation to understand the data they have generated, then it is incumbent on them to couch it, and any attendant caveats, in a form that is readily understandable. From

the above, it would seem that Highways England have claimed that they have failed in this task; calling into question the entire consultation process.

We now learn that Highways England have sought an extension to a Freedom of Information Act request submitted on our behalf (https://www.whatdotheyknow.com/request/a303_stonehenge_scheme_predicted?nocache=incoming-944305#incoming-944305) citing that “the information requested must be considered under one of the exemptions to which the public interest test applies. This extra time is needed in order to make a determination as to the public interest.

Highways England have insisted that objections to, or criticisms of, the prescribed methods (eg CRTN, DMRB, etc), or the way in which they have been employed in this specific situation “will not be registered” within the consultation response appraisal. Whilst they claimed that such concerns will be captured “somehow”, we have little confidence that will be the case, hence the extended distribution of our response.



We note that in the Introduction to the 2003 Environmental Statement Volume 2 Part 5, above, there were numerous caveats that support our contention that Highways England have failed to employ CRTN effectively and appropriately, including: “*It is desirable that the CRTN calculations be validated by supporting measurements at selected locations*”. Or: “*At the time of writing, a number of measurements under certain wind directions remain outstanding...*” So, it is quite clear that best practise involves validating CRTN calculations against real world data and also means that the local meteorology needs to be taken into account. The only shortcoming in the 2003 evaluation was the use of Met data from RAF Lyneham, almost 40km to the north.

It would have been useful had Highways England been able to produce information like that shown above to illustrate the baseline data as done here.

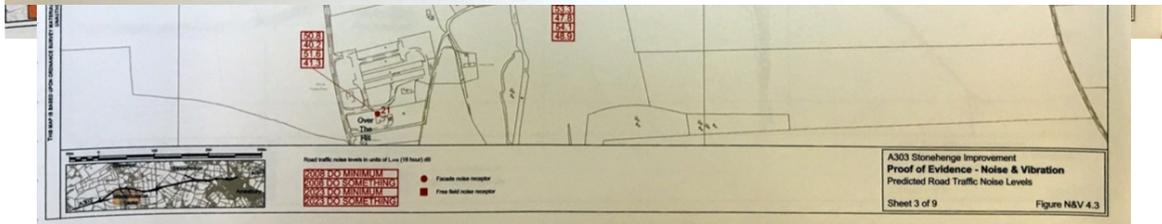
CRTN predictions should also have been produced to show the impact of each road scheme, as here:

and all this with the quality underpinning data absent in the consultation documentation.

Table C1 A303 Stonehenge Baseline Noise Measurements

Site Address	date	start 15 min	LAeq	LA10	LA10 avg	LA10 variation	LA50	LA90	LAmaz	LV	HV	total 15 min	equiv. hourly	%HV	wind dir	v m/s	comments
1e Scotland Lodge Farm E facade	20-Feb-01	13.40	51.6	53.5	53.2	1.0	50.0	46.5	65.8	313	43	356	1424	12.1	W	0-1	A303, 1 distant aircraft, rooks
	25-Jul-01	11.10	53.0	53.5			51.0	47.0	78.4	286	51	337	1348	15.1	SE	0-1	A303, birds
	25-Jul-01	14.30	49.9	52.5			48.5	45.0	62.2	288	46	334	1336	13.8	SE	0-2	A303, distant combine
1w W facade	20-Feb-01	14.00	59.8	62.5	60.5	3.0	58.5	53.5	68.9	273	46	319	1276	14.4	W	0-1	A303
	25-Jul-01	11.30	56.2	59.5			54.5	42.5	68.1	282	54	336	1344	16.1	-	0	A303
	25-Jul-01	14.47	56.9	59.5			55.0	49.5	69.6	298	50	348	1392	14.4	SE	0-2	A303
2 Cherry Lodge Parsonage Down	25-Jul-01	15.20	40.0	40.5	40.5	0.0	37.0	35.0	66.1					-	-	0	A303 not audible, distant aircraft
3f Foredown Ho. Manor Farm	15-Feb-01	14.45	47.5	50.0	57.0	14.0	46.0	41.5	62.7	251	43	294	1176	14.6	-	0	A303, helicopter, birds
	27-Sep-01	14.28	62.3	64.0			61.0	58.5	86.4	556	64	620	2480	10.3	SE	1-2	A303, shotguns
3e E facade	20-Feb-01	13.00	44.7	46.5	48.0	6.5	42.5	37.5	62.8	241	53	294	1176	18.0	W	0-2	A303, artillery (sporadic)
	25-Jul-01	12.20	49.5	52.0			48.5	44.5	60.3	229	37	266	1064	13.9	SE	1	A303, occasional combine
	26-Jul-01	13.10	43.2	45.5			41.0	37.0	66.0	349	46	395	1580	11.6	-	0	A303
3n N facade	25-Jul-01	12.00	40.1	42.0	40.5	3.5	39.0	36.0	57.6	269	43	312	1248	13.8	SE	0-1	A303, occasional combine, leaves
	25-Jul-01	12.35	39.5	41.0			38.5	35.5	52.5					SE	1	A303, occasional combine, leaves	
	26-Jul-01	12.45	37.2	38.5			35.5	33.0	55.3	384	71	455	1820	15.6	-	0	A303
4 Hillside Cottages	15-Feb-01	14.10	46.6	49.0	49.1	6.0	45.5	42.5	56.4	223	66	289	1156	22.8	-	0	A303, farm vehicles, 1 aircraft
	25-Jul-01	16.05	47.1	46.5			42.5	40.0	71.3	258	58	316	1264	18.4	SE	0-2	A303, occasional cattle, distant
	16-Aug-01	15.05	49.8	52.5			49.0	45.0	56.4					-	-	0	A303 Rain after 4 mins: traffic
5 Track 550m S of A303	05-Sep-01	12.15	45.9	48.5			44.0	38.5	60.3	241	54	295	1180	18.3	NW	1-2	A303, Cows
	24-Jul-01	13.30	42.3	44.5	48.5	7.5	41.0	38.0	54.3	239	38	277	1108	13.7	NW	0-1	A303 audible, birds, some distant
	16-Aug-01	14.15	47.2	49.0			46.0	43.0	62.2	383	62	445	1780	13.9	W	0-2	A303, Paused 4 aeroplanes and 1
6w Stonehenge monument W	05-Sep-01	15.22	50.4	52.0			49.0	46.5	66.6	318	57	375	1500	15.2	W	1-2	A303, distant helicopter
	24-Jul-01	10.35	47.9	54.0	52.2	3.5	47.0	44.0	63.3	269	57	326	1304	17.5	WNNW	2	A303 and A344 audible from W
	24-Jul-01	14.55	47.5	50.5			45.5	42.5	61.9	287	46	333	1332	13.8	NW	0-1	A303
s Stonehenge monument S	24-Jul-01	10.55	50.4	52.0	55.5	16.5	48.5	45.5	79.4	322	43	365	1460	11.8	WNNW	2	A303 audible from W only.
	24-Jul-01	15.15	46.2	48.0			45.0	43.0	59.9	311	49	360	1440	13.6	-	0	A303
	25-Jul-01	13.30	50.1	53.0			48.5	45.0	65.6	284	45	329	1316	13.7	SE	0-2	A303, some speech, distant
	26-Jul-01	15.00	52.1	55.0			50.5	46.5	64.3	390	55	445	1780	12.4	SW	0	A303
	01-Aug-01	13.55	57.3	59.5			56.5	51.5	66.9	287	43	330	1320	13.0	E	0-2	A303, distant combine and
	28-Sep-01	12.07	62.8	64.5			62.0	59.4	78.6	483	47	530	2120	8.9	SE	1-2	A303 audible (loud) from east
e Stonehenge monument E	24-Jul-01	11.20	49.4	51.5	49.7	3.5	48.5	45.5	69.4	293	47	340	1360	13.8	WNNW	0-2	A303 audible from W. A344
	24-Jul-01	15.35	45.3	48.0			43.5	40.5	60.4	280	29	309	1236	9.4	-	0	A303

Mott MacDonald



We will want assurances that Met data from sites closer to Winterbourne Stoke and Stonehenge will be used in any further work that is undertaken by Highways England. Perhaps weather stations at Boscombe Down or Larkhill, would be much more representative than Lyneham?

We raised the comparison of the A303 Stonehenge scheme with that for the Lower Thames Crossing (LTC); noting that the latter had provided much of the detail we were calling for in relation to the two bypass options for Winterbourne Stoke for several more options for the Lower Thames Crossing. Highways England were very dismissive of this, claiming that the two projects were at very different stages of comparison.

The flow diagram showing the current progress of the A303 Stonehenge Scheme is shown in the Technical Appraisal Review document:

The equivalent flow diagram for the LTC scheme appears as follows:

We think that the comparison is quite clear and unambiguous - a very different level of detail has been provided for the two schemes at the point the route options went out for public consultation. Once again, we were disappointed by the way Highways England so readily dismissed these concerns.

Highways England have denied that they or Arup/Atkins are "sitting on" outstanding archeological reports. Nevertheless, the reports remain outstanding. Consequently, it is not possible for villagers, who live close to the WHS, and many of whom take an active interest in it, to take an informed view as to their importance and vulnerability and weigh them against the interests of the living.

Options identification

Process

A three stage process of options identification and sifting was followed to shortlist route options to be subsequently taken through the further more detailed appraisal to confirm the route options for consultation.

3.5 Option Identification, Development and Selection

3.5.1 The approach taken to identifying, developing and selecting routes for public consultation is shown in **Figure 3.2** below. The red arrow indicates the current stage i.e. prior to public consultation.



FIGURE 3.2 - OVERVIEW OF APPROACH TO IDENTIFYING, DEVELOPING AND SELECTING ROUTES FOR PUBLIC CONSULTATION

We raised the question of the reported belt of phosphatic chalk lying under the surface close to Stonehenge and our concerns regarding this; both in terms of the possible though unquantified hazard arising from radon emissions, but more predictably from the possible release of high levels of phosphate into the environment close to the sensitive sites at Parsonage Down and the Till Valley. We were rather taken aback by Highways England's absolute dismissal of this and the science underpinning it. However, no evidence was presented that supported their contention.

Many villagers had believed, from the outset, that a primary driver behind both of the route selections was the need to get rid of as much of the tunnel spoil as possible in the course of building a bypass for Winterbourne Stoke. Highways England admitted that this was indeed the case. The reason for the inclusion of the southern route being the pressure being brought to bear by the archeological community to remove as much of the route as possible from areas of archeology in the WHS near the current Longbarrow roundabout. Neither answer inspires us with any confidence that the needs of Winterbourne Stoke are being considered fairly and reasonably in the consultation process.

One has to ask the question that if there is concern that a methodology being used to justify a new road scheme, or the way that method is being employed might be unfit for purpose, when would be an appropriate time to raise it? We believe, as a Parish Council, that this is very much the case here for the A303 Stonehenge scheme. We are concerned that the prescribed assessment and appraisal methods are demonstrably out-dated, unfit for purpose, or, in the case of the higher levels of aggregation (WEBTag), unproven and high risk.

We believe that these methods have not been used in accordance with industry best practise and in some circumstances have been used in ways that by design, or error, minimise differences between the two route options. We are fearful that when these errors are fed into the higher level models, these differences are further diluted and hidden from view.

The reaction of Highways England when challenged on this is reminiscent of the Roman Inquisition's reaction to Galileo Galilei's views on heliocentrism. No matter how often the authorities insisted their view was correct and that the sun revolves around the earth, Galileo remained correct in his view and right to challenge them: "E pur si muove" (...and yet it moves!). On a scheme of such national and international importance, it is critical that DfT have independent review of ALL the methods used by Highways England on their behalf and have independent assurance that they have been correctly employed in this case. Highways England must not be allowed to act as judge and jury in their own trial, which seems to be the case at the moment.

It was and is incumbent on Highways England to provide the answers demanded by local villagers, in a way that is understandable and that addresses their concerns in an objective and fair manner. This has not yet been done and consequently there is little reason for us to change our initial recommendation that the consultation period be delayed/extended and no route selection made, until this has been achieved.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'JH Carr', written in a cursive style.

Mr JH Carr

Clerk to Winterbourne Stoke Parish Council

Cc.

Chris Grayling MP, Secretary of State for Transport

John Glen MP

Jim O'Sullivan, CEO Highways England

Fleur de Rhé-Philipe, Wiltshire Council

Ian West, Wiltshire Councillor for Till and Wylve Valley

Anne Henshaw, Council for the Protection of Rural England Wiltshire

Andrew Forster, Local Transport Today

Paul Clifton, BBC

Salisbury Journal

Winterbourne Stoke Parish Councillors