

A30 Blackdown Hills consultation ~ Response from Campaign for Better Transport

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment. We welcome the opportunity to respond to proposals for the A30 Honiton to Devonshire Inn.

Summary

We formally object to all the proposed new road options, on the grounds that none of them will deliver sufficient benefits to justify the significant environmental costs they will impose in a protected landscape setting. Increasing road capacity will undermine key policy goals on environmental protection, modal shift, carbon reduction, air pollution and public health.

We are concerned that new road building is being considered in this location before all other options have been considered, contrary to the principles of sustainable development. The primary purpose of this scheme is not to improve the local environment, but as the consultation documents indicate, to contribute to a long distance cross-country route, at great financial and environmental cost. While any benefits would be only temporary, the adverse impacts will be permanent.

We are opposed to all three options (Blue routes N & S and Orange route) as they would all increase road traffic within a protected landscape.

We do not agree that Devon County Council has proposed an 'environmentally-led scheme'. Instead, we are presented with a series of off-line options, all of which will impose considerably impacts on the landscape and tranquillity of the AONB.

A truly environmentally-led approach would have considered other, less damaging alternatives first, including small scale improvements to the existing road, better traffic management, use of the preferred M5 route and a strategic approach to freight movements, combined with better public transport alternatives.

Do you agree that there is a need for the proposed improvements to the A30 Honiton to Devonshire Inn?

No. We are particularly concerned that new road construction and increased road capacity is proposed in an Area of Outstanding Natural Beauty (AONB). AONBs enjoy special protection under the National Planning Policy Framework (NPPF) and the National Policy Statement for National Networks (NNPS).

The NPPF (sections 115 and 116) states: *“Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas... Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.”*¹

¹ DCLG “National Planning Policy Framework” 2012

The NNPS (section 5.152) states: “*There is a strong presumption against any significant road widening or the building of new roads and strategic rail freight interchanges in a National Park, the Broads and Areas of Outstanding Natural Beauty, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly. Planning of the Strategic Road Network should encourage routes that avoid National Parks, the Broads and Areas of Outstanding Natural Beauty.*”²

This protection is very significant in planning terms and should clearly not be compromised in circumstances where they are unjustified or there is an alternative. An approach based on demand management and sustainable modes would sit far more comfortably with the NPPF which advocates that “*economic, social and environmental gains should be sought jointly and simultaneously through the planning system*”.

Providing new road capacity can only be a temporary solution to congestion. The phenomenon of induced traffic is well-established. This has been seen for example at the Dartford Crossing in Kent, where repeated increases in capacity have been overwhelmed by growing demand. Highways England report “*Analysis of traffic data shows that traffic demand at Dartford has responded in step with capacity; such that whenever new capacity has been provided, it has filled up and created the need for more capacity. This has been a recurring pattern since the second tunnel was opened at Dartford in 1980 and then the QEII Bridge in 1991. Today there is insufficient capacity to cater for current and future traffic demand.*”³

The higher traffic volumes and encouragement of car use arising from new road capacity would be at odds with other key public policy priorities. The UK has a binding target of an 80% CO2 emissions reduction by 2050 and reducing transport emissions is key to achieving this and it is questionable whether these emissions can be reduced quickly enough through a move to low and zero emission vehicles alone.

The UK Government has been found to be in unlawful breach of air quality standards with local authorities required to implement action plans to reduce air pollution. The major source of NOx and particulates is emissions from diesel engines. The level of breaches of vehicle emissions regulations means that air pollution baseline assumptions are meaningless. New research has found that not one single brand complies with the latest air pollution limits (‘Euro 6’) for diesel cars and vans in real-world driving conditions.⁴ Even a marginal increase in traffic levels as a result of the new road will adversely impact roadside air quality. There is also a risk of displaced traffic on to local roads with adverse impacts on congestion, safety and environmental quality, and increased traffic through communities at either end of the route.

Much of the traffic in this location is seasonal holiday traffic. As the scheme *Traffic assessment information report* confirms, there is over an 80% increase in traffic on this route in August compared to January. A seasonal capacity issue does not justify a permanent encroachment on the AONB.

In the case of the A30, we believe there are a number of alternatives to these damaging proposals.

Firstly, long distance traffic should be directed to use the primary M5/A358 route. The consultation leaflet notes this route is 14km longer: this is a disingenuous objection for distance traffic, as 14km is marginal in context of the 250km distance from London to Honiton or 300+km from Reading to Cornwall.

Secondly, better use of smarter traffic management could be made, as envisaged in Highways England’s Innovation Strategy. This could include smart queuing with timed slots for freight loads, better use of real time traffic information and deploying state of the art Variable Message Signs at either end of the route, away from the most sensitive locations, as well as better enforcement of existing speed limits.

Thirdly, we believe that there is potential for some inline improvements to improve sightlines and safety, and review junctions to relieve pinch points, without building new sections of road. This could also be an opportunity to improve provision for walking and cycling.

² DfT “National Policy Statement for National Networks” 2014

³ Highways England “Lower Thames Crossing Pre-Consultation Scheme Assessment Report” 2015

⁴ Transport & Environment: “Dieselgate: Who? What? How?” 2016

In the longer term, we advocate a more strategic multi modal approach to long distance travel including a shift to rail freight as envisaged in the Government's recent Rail Freight Strategy.

Investing to improve the capacity for rail freight has multiple economic benefits for the region as well as being significantly less environmentally damaging. There are cross-cutting benefits from the inward investment for passenger rail (as outlined by the Peninsula Rail Task Force), creating a virtuous circle of improved alternatives and reduced demand for road space.

Do you have any further suggestions for environmental mitigation and enhancement opportunities?

We do not support the proposals for new road construction in the AONB and do not believe that any proposed mitigation could adequately address the permanent damage to protected landscapes and habitats. While noting the proposed mitigation measures, we believe they cannot justify the proposals.

The proposed schemes offer very weak visual mitigation, with few cuttings and limited landscaping. We are particularly concerned with the proposed diversion of the current road up on to the landscape plateau. The route along Viney Ridge will impose considerable damage on one of the most valued parts of the AONB landscape in this location.

As noted above, given the near universal breach of Euro 6 regulations by certified vehicles in real world driving conditions, we are sceptical that any air pollution mitigation plan can be reliable.

However we do see potential for environmental improvements to the existing road and would like to see detailed proposals for improving cycling and walking provision, both as linear routes, and for safe and high quality crossing points based on desire lines, to encourage active travel and address community severance.

We note recent use of onsite reuse of materials for road schemes in Somerset. We commend this approach for maintenance work on the existing road. This approach has multiple benefits in reducing traffic to and from the work site, reducing the need for materials storage, among other environment, cost and time savings.

Conclusion

We object to all three route options as they depend on new road construction within the AONB.

We believe that the impact on the protected landscape, combined with permanent loss of habitats, increased air pollution and noise pollution, poor provision for vulnerable road users, and worsened community severance, provide clear grounds to reject these road plans.

September 2016

Bridget Fox
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

16 Waterside, 44-48 Wharf Road, London N1 7UX
Registered Charity 1101929. Company limited by guarantee, registered in England and Wales: 4943428