

A417 'Missing Link' 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 A417 'Missing Link' consultation.

Summary

We formally object to both the proposed new road options, on the grounds that neither of them will deliver sufficient benefits to justify the significant environmental costs they will impose in a protected landscape setting and both fail the major development test. Increasing road capacity undermines key policy goals on environmental protection, modal shift, carbon reduction, air pollution and public health.

We are concerned that damaging new road building is being considered in this sensitive and important 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 address what is seen by some as a 'missing link', at great financial and environmental cost.

What is disappointing is that the previous landscape led approach to finding a solution to this section of the Strategic Roads Network appears to have been jettisoned without any explanation. This is unacceptable. It has also led to the rather odd re-introduction of a previously discarded scheme (option 12) to give the semblance of choice within the consultation process. However, this is yet another example of Highways England proceeding to public consultation without any real choice at all.

Comments on the consultation process

We are particularly concerned at what appears to be a recurring theme with Highways England consultations. Two options are put in front of the public but one of those is written off by Highways England so that effectively only one option is being consulted upon. Even if both were valid options, with the narrow range of options presented, the public is given very little chance to influence the outcome of the route selection process. Consequently, it appears to be little more than a tick-box exercise to allow Highways England to say that it consulted with the public before it selected its preferred route.

It is not until the formal consultation on the preferred route that the public would expect to only be consulted on one route. Before that time, good practice would encourage the public to be engaged in a wide number of options to allow Highways England to properly consider all the possibilities for delivering a particular scheme.

Instead, what we have here is a predetermined preferred option, based on an arbitrary cost constraint, with a previously rejected aunt sally (option 12) thrown in to try and give the pretence of choice. In the consultation documents Highways England explains the landscape led process and how the options fared, including the various tunnel options. However, there is no justification provided for arbitrarily choosing a funding budget which, quite by chance, manages to exclude any tunnel options.

Justification for the scheme

The scheme appears to be justified on the grounds that it will fill a missing link between the M4 and M5, yet the information provided as part of the consultation shows that all options increase air pollution and carbon emissions because of the extra traffic that will result and the longer distance the traffic would then travel. As this would cause more traffic to pass more houses, than were the traffic to go on the A34 and M40, its impact will be greater. Therefore, rather than being a missing link, it appears to be more of a lengthy and polluting diversion.

This is reinforced by the poor cost-benefit ratio for the preferred option (30) which only just manages to get above one, hardly a convincing case for new road construction, especially given the environmental impacts. At least one of the tunnel options has a better cost benefit ratio than option 12, while the benefits of placing the road in a tunnel are not truly recognised by the current assessment process.

If these wider benefits had been given sufficient weight then different tunnel options would have featured in the consultation.

Impact on an Area of Outstanding Natural Beauty

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 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

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. The case for building this road is far from compelling given its very low or poor cost benefit ratio and certainly does not meet the test for building in an Area of Outstanding Natural Beauty. It should therefore be withdrawn as a proposal as it currently stands. If Highways England continues with promoting option 30 it is either going to waste a lot of time and money, or, if approved, would set a dangerous precedent, opening up nationally designated landscapes to all sorts of damaging developments.

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”*.

Road building only a temporary solution

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.

¹ Paragraphs 115 and 116, National Planning Policy Framework – DCLG, March 2012

² DfT “National Policy Statement for National Networks” 2014

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 2017 Report to Parliament from the UK Committee on Climate Change noted that carbon dioxide emissions from transport have increased 0.9 per cent from 2015 to 2016, the third successive year that emissions have risen. The Committee advises that this trend needs to be reversed, as a matter of urgency, to deliver a reduction in emissions of 44 per cent from 2016 to 2030⁴. The consultation documents make clear this proposal will increase carbon emissions, yet this fails to be properly addressed both here and at the more strategic Government level.

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 NO_x 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 conditions⁵. The increase in traffic levels as a result of the new road will adversely impact roadside air quality along the route and in surrounding towns and villages some of which are likely to have air pollution issues.

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 as well as being significantly less environmentally damaging. There are cross-cutting benefits from the inward investment for passenger rail, creating a virtuous circle of improved alternatives and reduced demand for road space.

The case for a tunnel

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 unless the road was put in a tunnel, which would produce some landscape and environmental improvements for the AONB and go some way to addressing the road’s serious overall negative impacts.

We believe that a sufficiently long tunnel is essential to safeguard the landscape and to provide a sufficient level of mitigation for a road that would otherwise cause major landscape harm.

Other aspects

Highways England claims that the schemes will have minor positive impacts on health and non-motorised users yet provides no evidence that this will happen. Given that the scheme will increase traffic it is going to lead to less attractive conditions for non-motorised users when this traffic leaves the strategic road network and uses local roads.

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

⁴ UK Committee for Climate Change – [2017 Report to Government](#)

⁵ Transport & Environment: “Dieselgate: Who? What? How?” 2016

While there could be benefits if improved crossings and facilities are provided for non-motorised users that are safe, direct and convenient, all too often this is not the case. This means designs should conform to the latest standards⁶. However, it should be pointed out that improvements could happen anyway and are not reliant on a new road to achieve them.

It is also worth noting that the tunnel options would provide the greatest benefits for non-motorised users as any interaction with fast moving traffic on the strategic road network would be completely removed.

Conclusion

We object to both route options as they clearly fail to meet the major development test for construction within the AONB. Little weight has been given to the landscape impact of the proposals contrary to national planning policy and this is clearly unacceptable. It cannot be right that Highways England constantly tries to avoid its duty to plan infrastructure in a sympathetic way in such important places. The use of arbitrary project costs as a reason to plough ahead with a cheaper option regardless of its impact should not be allowed.

We believe that the impact on the protected landscape, combined with permanent loss of habitats, increased air and noise pollution and increased carbon emissions, provide clear grounds to reject these road plans.

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Chris Todd
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

⁶ For cyclists this is [Design Manual for Roads and Bridges IAN 195/16](#)