Campaign for Better Transport

The A14 Ellington to Fen Ditton
~ Response from Campaign for Better Transport

This road condemns the East of England to gridlock and locks in carbon emissions

The Highways Agency's plans to widen the A14 between Ellington and Fen Ditton are unaffordable, out-dated and inconsistent with Government planning and transport policy. The scheme would increase traffic and greenhouse gas emissions, encourage unsustainable development, attract people from public transport and rail freight, whilst journey times in future would still be greater than they were at the turn of the century.

That is not to say that there are no transport problems on the A14, just that this scheme is not the best solution to those problems. We propose that this scheme be rejected as representing poor policy fit and bad value for money, and a package of lower-carbon alternatives introduced in its place.

The scheme is unaffordable and would take money away from more needy projects

At £1.3 billion, the A14 is the most expensive scheme in the Government's roads programme. Such considerable outlay requires special consideration, outside the normal appraisal process, because approval would concentrate almost one-and-a-half years' of the Highways Agency's capital maintenance and improvement budget on a single project. We cannot see how the Agency can justify spending so much on one scheme whilst the UK is in recession, because building this project means many other schemes – road, walking, cycling and public transport – would need to be cancelled so as to afford it.

That a scheme is expensive does not make it bad *per se*; value for money must, of course, be considered in light of a proposal's fit with Government targets and policies. Unfortunately the scheme works against the Government's goals for transport, as expressed in *Delivering a Sustainable Transport System*, as well as conflicting with many national planning policies on the environment, climate change and sustainable development. The scheme is therefore terrible value for money, with extensive opportunity costs, in that its sizeable cost could be invested instead in schemes which support policies and help us meet national targets.

Option identification is out-of-date and consideration of alternatives is inadequate
Given limited budgets, the Highways Agency needs to show that solving problems on the A14 is the best way for the Government to spend £1.3 billion, as opposed to spreading the money across a number of other, equally crucial, transport improvements. They have yet to do so. It is hard to believe that the transport problems on the A14 are the most crucial facing the country, warranting us cancelling other projects to afford such considerable outlay. It is equally doubtful that local authorities and regions outside the East of England would be prepared to sacrifice schemes they regard as essential to solve problems on the A14. This is, however, exactly what is being asked of them.

Secondly, to understand the economic benefits of a given project, we must have alternative proposals to compare it with. Even if we accept that solving the A14's transport problems would by the best way to invest £1.3 billion of capital transport spend (and this is far from proven), we do not know whether the best option is, as the Agency proposes, to construct what is essentially a motorway between Cambridge and Huntingdon

or whether we would be better off investing in a package of smaller proposals along the corridor, such as extending the Cambridgeshire guided busway to St. Ives, or carrying out gauge improvements on the Felixstowe-Nuneaton rail freight line. We cannot answer this, as the most recent option identification work on the corridor was carried out in 2000, and even that started from the assumption that there would almost certainly be major road building along the corridor. The Highways Agency cannot tell us whether its preferred option is the best solution, because it has never considered whether other options might be preferable. We therefore cannot assess the merits of this scheme nor evaluate whether this is the best option for the area, whether in terms of benefit to travellers, the economy or the environment.

While there was limited work on multi-modal options during the 2001 Cambridge-to-Huntingdon Multi Modal Study (CHUMMS), most of the proposals introduced to manage demand (such as congestion charging, retaining the old A14 as a "public transport corridor" and the east-west rail line between Bedford and Cambridge) have been quietly abandoned. All that remains of the CHUMMS package is the guided busway and this road scheme; none of the measures to mitigate the increase in traffic which accompanies this scheme are going to be introduced. Given the cost of the scheme, and the impact that funding it would have on other transport schemes, it makes sense to pause for thought, revisit the optioneering and assess whether there would be a better solution to the undeniable issue of congestion and collisions along the A14.

Widening this road is wholly incompatible with Government transport policy

The Government set out a new approach to transport provision in *Delivering a Sustainable Transport System* (DaSTS). This detailed five goals against which each new project should be assessed. These are:

- Supporting economic growth
- Tackling climate change
- Contributing to better safety, security and health
- Promoting equality of opportunity
- Improving quality of life and promoting a healthy natural environment.

Economic benefits eroded by an increase in journey times

Firstly, the scheme provides no benefits to motorists, with the increase in traffic and distance outweighing any increase in speed. The Highways Agency claims that the scheme will improve journey times, but this is misleading and incorrect. Journey times with the full gambit of proposals outlined in CHUMMS will take three minutes longer in 2016 than they did in 2000[1]. Worse, "a detailed analysis of the data… indicates that demand management would be responsible for about half of the improvement in journey speeds." Most of the demand management measures put forward in this study have been quietly dropped, so the actual journey times are likely to be even greater than predicted and certainly greater than they are at present.

To arrive at their erroneous conclusion the Agency used a 'do minimum' baseline which assumes levels of development and traffic growth which would not be possible without the road scheme. The Agency is acting as though 'things getting worse less quickly' equates to 'things getting better', despite their being clearly and appreciably different. It is unlikely that the public – motorists and non-motorists alike – would agree, but they are none the wiser, as the Agency consistently states that its proposals to widen the road would reduce journey times, despite knowing that journeys will take several minutes longer in 2016 than they do today.

It is also clear that while the Department for Transport and Highways Agency assume that faster journeys are the primary measure of economic success, businesses and people regard journey time reliability as their main concern. The A14 Ellington to Fen Ditton is forecast to substantially increase traffic along the A14 and surrounding road network, slowing down traffic in the process. This extra traffic would have a knock-on effect on journey time reliability, causing delays and frustration for motorists and undermining any short-term

[1] Cambridge to Huntingdon Multi-Modal Study, Chapter 5, table 5.2. 2001.

economic benefits derived from increasing journey speeds. Whilst the Appraisal Summary Table claims that such incidents would be less severe than otherwise, this employs the same false logic seen with journey time savings, comparing reliability and severity of incidents in future with an unrealistic do-minimum scenario. In real terms, journeys in future will take longer because of the level of congestion, which will in turn reduce reliability and increase the number of incidents (as forecast in the AST).

Further, the AST claims large-scale benefits attributed to fuel duty revenue. Including revenue to central Government from fuel duty in valuing benefits and costs is a discredited practice which the Department abolished earlier in 2009. The true cost of the scheme is therefore not -£300m as stated, but £1 billion in 2006 prices, and £1.3 billion in real terms.

Carbon emissions would be locked in with more people driving further

Widening the A14 between Ellington and Fen Ditton would increase carbon dioxide emissions by 120,000 tonnes; a total of 16,442,473 tonnes of CO2 over the scheme's lifecycle. This is, as the Appraisal Summary Table notes, "the result of the increase in vehicle kilometres travelled with the scheme". This figure is calculated against a do-minimum baseline; i.e. it assumes that CO2 levels going forward would increase according to historical trends. However, given that the Government expects to meet its new 80% reduction targets, which were enacted in the Climate Change Act, greenhouse gas emissions can be expected to fall 80% below 2005 levels over the next 40 years. While the rest of the country is reducing their emissions, emissions on the A14 are expected to rise dramatically.

This is a problem for two reasons. Firstly, any increase in emissions above the Government's 80% reduction pathway will need to be made up from elsewhere in the economy. This could be done by transport interventions in the region (e.g. by attracting people to public transport or by introducing congestion charging to decrease demand), by non-transport regional interventions (e.g. by insulating lofts across Cambridgeshire or by constructing a network of biomass generators) or indeed by national interventions, whether transport related or otherwise. It does not matter where these reductions come from, only that they will have to come and they will have to be paid for. However, this will become increasingly costly over time, as we will need to make greater reductions and the 'low-hanging fruit' will become more scarce.

Secondly, there are the opportunity costs of investing in this scheme as opposed to a more sustainable package of interventions. Meeting the Government's CO2 targets is non-negotiable, and budgets are limited as a result of the recession. It would be foolish to spend so much money on a scheme which increases emissions when we could be investing it in a scheme to reduce greenhouse gases. Given that we will have to make these reductions regardless of budgetary constraints, it is surely more sensible to invest in schemes which achieve reductions first. There will be plenty of time to invest in schemes which would increase greenhouse gas emissions once we are on track to meet these targets and have a better understanding of the potential for further cuts to accommodate an increase in emissions caused by widening the A14.

Higher traffic levels increase severance and decrease safety on surrounding roads

While the Agency's AST states that the removal of at grade crossings would decrease collisions on the A14 itself, the widening scheme would also increase the volume of traffic on the surrounding road network. This would increase severance, cutting existing communities in half, and to increase the number of collisions (even if individual drivers on the A14 are less likely to be involved in a crash). It is notable that this is one of the many reasons why parish councils along the route of the scheme oppose it. It should also be noted that while providing grade-separated crossing points to enable people to cross the new A14 may be safer than expecting them to cross five lanes of traffic in each direction, the A14 will remain a significant and dangerous barrier for non-motorists to cross.

Concentrating so much money on motorists locks out the poorest in society

Decades of transport statistics have shown that the wealthier you are, the more likely you are to own a car (with the notable exception of pockets of London). Conversely, the poorest in society are most likely to find

themselves on the bus or walking. Investing in this scheme entirely favours already wealthier car drivers, at the expense of poorer public transport users and pedestrians, and therefore works against the Government's equality of opportunity goal.

Negative environmental impacts would destroy biodiversity and damage communities
The AST describes the scheme's landscape impact as large adverse, with moderate adverse impact on historical resources and biodiversity. This is attributed to its route, which runs through fenland and large scale agricultural areas and woodland. The scheme is also opposed by a number of parish councils between Cambridge and Huntingdon, concerned about its impact on their quality of life and communities. As such, this scheme works against the DaSTS goal of protecting biodiversity and improving quality of life.

Major conflicts between widening proposals and national planning policy

This scheme conflicts with a number of national planning policies, specifically PPS1, PPS7, PPS9 and PPG13. This is summarised in the AST as follows: "Scheme conflicts with overarching objectives of NE & DCMS in conserving & enhancing biodiversity & landscape. Facilitates DFT objectives in reducing congestion, improving local accessibility but hinders those seeking less dependency on road transport & DECC objectives of reducing greenhouse gas emissions which contribute to climate change." However, its claims to reduce congestion have been shown above to be unfounded, because they are compared to overly-pessimistic and unrealistic forecasts; in real terms congestion would increase, demonstrated by a decrease in real-time journey times.

Massive increase in carbon emissions clashes with PPS1
The scheme is in conflict with PPS 1, which states that:

"Regional Planning Bodies and local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change – through policies which reduce energy use, reduce emissions (for example by encouraging patterns of development which reduce the need to travel by private car)" (paragraph 13(ii)).

This scheme is a hangover from the days of predict and provide and is fuelled by the assumption that the best growth model is car-based development epitomised by ribbon development and large metal sheds on A-roads. This has been conclusively rejected by Government, in favour of a more sustainable approach to development. The scheme's enormous greenhouse gas impact clearly does not fit with PPS1, nor with the Climate Change Act, as discussed above.

Negative impact on biodiversity and historical resources does not fit with PPS7 or PPS9
Further, the scheme's "moderate adverse impact" on biodiversity and heritage of historical resources conflicts with PPS 9, which states that *"The aim of planning decisions should be to prevent harm to biodiversity and geological conservation interests"* (paragraph 1(vi)) and PPS 7: *"Planning authorities should continue to ensure that the quality and character of the wider countryside is protected, and where possible enhanced"* (paragraph 15).

Scheme promotes unsustainable development, conflicting with PPG13
The scheme runs counter to the Government's position on sustainable transport, as outlined in PPG 13. PPG 13 states that:

"The objectives of this guidance are to integrate planning and transport at the national, regional, strategic and local level to:

1. *Promote more sustainable transport choices for both people and for moving freight;*

2. *promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and*
3. *reduce the need to travel, especially by car."*

The large-scale increases in traffic which are predicted to accompany the scheme, such that journey times in future will be slower than in 2000, clearly do not sit well with the sustainable development envisaged by PPG13. Constructing an entirely new 10 lane motorway between Cambridge and Huntingdon can have no other effect than the encouraging of car commuting between the cities, as well as enabling ribbon development and locking in unsustainable travel patterns and lifestyles. It is hard to think of another scheme which so clearly conflicts with the Government's sustainable planning policy.

Highways Agency modelling is unreliable and underestimates negative impacts

Commensurate with our concerns about the arbitrary nature of the baselines adopted to inform comparative analysis (see above) are further issues with the Agency's modelling and forecasting. These have been aptly summarised by Atkins, in a report commissioned by the HA into their post-opening project evaluation (POPE) reports, which paints a damning picture of the accuracy of Agency modelling.

This study found that there was a culture of underestimating negative impacts at the Agency. For instance, it found that traffic levels tended to be higher than predicted, with more traffic induced by the scheme than was first thought. There has been little or no process of learning from past mistakes, meaning that there is likely to be significantly more traffic generated as a result of this scheme than the Agency has forecast there to be. Further, Atkins discovered that the forecasting of economic benefits was "generally not accurate", with outturn benefit-cost ratios tending to be lower than forecast; also, other research into this area by the Liberal Democrats showed that CO2 impacts were, on average, twice as high as predicted.

The discrepancy between forecast and outturn is not merely one of modelling; there are major issues of competency to deal with. Many of the POPE reports discovered that the Agency had omitted to include the traffic impact of schemes under construction (underestimating the volume of traffic), or included schemes which had been cancelled (overestimating future and baseline traffic levels). During the public inquiry into the Mottram Tintwistle bypass, the Agency spent millions of pounds on flawed models, until finally abandoning its efforts to model the impact of the bypass and withdrawing its application for planning permission some eighteen months after the inquiry started.

To make decisions of this scale, we must be absolutely sure of what the outcomes will be. The Agency's POPE reports show that their modelling and forecasting cannot be relied upon. We therefore recommend that this scheme is put on hold while the Agency revisits its forecasting software and works out a strategy for improving the accuracy of future forecasting before over one billion pounds is spent without being certain of what the impacts are likely to be.

Conclusion: reject this scheme and invest in sustainable transport instead

The coming months will be full of difficult choices. The recession and the accompanying need to make drastic cuts in public sector spending will mean that many schemes which would otherwise have been built will no longer be affordable. Given this, the only sensible strategy would be to focus on building schemes which work towards Government objectives and to reject those schemes which work against them.

No one is denying that there are problems on the A14. But this scheme is by no means the best solution. The Highways Agency has yet to demonstrate that spending £1.3 billion on a major road between Cambridge and Huntingdon is the best solution to congestion on the A14; neither has it shown that the problems on the A14 are so great that we must sacrifice other schemes around the country to solve them.

Instead of pouring so much money into a scheme which will not reduce journey times in real terms, we should investigate packages of alternatives to improve the A14 for considerably less outlay. These could include: gauge improvements on the Felixstowe-Nuneaton line to improve rail freight; junction modifications to the A14 to reduce incidents; extending the guided busway to St. Ives; re-opening the Cambridge-Bedford rail line; widespread demand management across Cambridgeshire to reduce local traffic; improving local bus services to reduce rural isolation and improve access to essential services. It might even include non-transport interventions, such as supporting lifeline services so that people do not have to travel as far to visit the post office, see a doctor, or do their weekly shopping.

Investing in sustainable interventions to solve congestion and collisions on the A14 would have two worthwhile effects. Firstly, it would save money which could be spent on other projects. Secondly, it would show that problems on the strategic network can be solved in a manner compatible with the Government's climate change targets and the well-established principles of sustainable development.

Campaign for Better Transport therefore opposes the A14 Ellington to Fen Ditton and requests the scheme be rejected with cheaper, more sustainable interventions introduced in its place.

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Campaign for Better Transport is the leading transport NGO. Our compelling arguments and ideas have won us the support of national decision-makers and local activists, enabling us to secure transport policies and programmes that improve people's lives and reduce environmental impact.

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