



A46 Strategic Link Road – consultation response.

Introduction

25th January 2021

This document is Cycleways' response to the A46 Strategic Link Road consultation.

Summary of Cycleways' consultation response

1. No climate change objective is included in the consultation document, despite all 3 signatory councils recognising that there is a climate change emergency, and that climate change mitigation is one of their strategic objectives.
2. Options 2 and 3 in the consultation document are principally based on road building and road vehicles. The sustainable options have not been considered as viable *alternatives* to the road schemes, despite these options having greater potential to meet the stated objectives *and* meet climate change targets;
3. The Vectos Detailed Modelling Assessment only considers road-based solutions. It ignores the sustainable options mentioned in the consultation document;
4. There is evidence that several key objectives stated in the consultation document will not be met, despite claims to the contrary;
5. All of the aims set out in the consultation document could be achieved by adopting the sustainable options.

Absence of climate change objectives

All three signatory councils on the A46 Strategic Link Road Consultation document have recognised that we face a climate emergency. They have explicit strategies and plans to address the climate emergency.

Given that all 3 signatory councils have explicit commitments to assess the climate impact of their projects and decisions, it is remarkable that the A46 Strategic Link Road Consultation does not include a climate change objective. The word "climate" does not even appear in the consultation document.

This omission is highly significant, given that greenhouse gas (GHG) emissions from road transport, at 24%¹ of total UK emissions, are the single highest source of GHG emissions in the UK. Cars contribute 61%² of the road transport GHG emissions.

Warwickshire County Council (WCC)

In July 2019 Warwickshire County Council (WCC) made the following commitments:

- As an organisation, we will embed climate change considerations into everything we do, making carbon reduction everyone's responsibility.
- Climate change will be considered as part of all council decision making including our capital investments and procurement processes.
- We will ensure we have the right information to enable us to prioritise our decision making based on understanding our own emissions and how this impacts on Warwickshire.

Warwick District Council (WDC)

In June 2018, in issue 4 of their Strategic Approach to Sustainability and Climate Change, Warwick District Council (WDC) undertook to:

- Promote and enable sustainability and climate change resilience in the wider district.

The council undertook that, by 31st March 2020:

- Every major decision is subject to a sustainability impact assessment;
- All major projects consider sustainability as part of the process.

Coventry City Council (CCC)

The Coventry City Council (CCC) Climate Change Strategy contains the following strategic aims:

- To ensure climate change is considered in every aspect of operations, services and informs decision making in the city
- To ensure all new buildings, development and infrastructure are sustainable

¹ P21, Reducing UK Emissions, Progress Report to Parliament, June 2020, www.theccc.org.uk

² P8, Sixth Carbon Budget, Surface Transport, December 2020, www.theccc.org.uk

The consultation document predicts that traffic volumes in the area under consideration are likely to increase by 25% over the next 10 years³, even in the absence of further road schemes. However, a WCC Air Quality report⁴ concluded that:

“A review of studies demonstrated that ‘an average road improvement has an additional 10% of base traffic in the short term and 20% in the long term: individual schemes with induced traffic at double this level may not be unusual, especially for peak periods.’”

This conclusion is also supported by other studies⁵. In other words, we might expect increased traffic volumes of up to 65% if options 2 or 3 were implemented, leading to an even bigger adverse impact on climate change.

Increased traffic volumes on this scale would lead to undesirable congestion at bottlenecks even with the increased capacity proposed. Measures to reduce traffic, rather than increase it, are more compatible with health, environmental, and active travel objectives.

The WCC Air Quality report goes on to say that:

“It is this recognition of the need to reduce the number of vehicle journeys that underpins the promotion of the use of public transport, walking and cycling; and a number of change travel behaviour initiatives (such as travel plans for schools and workplaces).”

The options in the consultation document do very little to reduce the number of vehicle journeys

Absence of viable sustainable options

The consultation document refers to a number of sustainable transport possibilities, but there is scant detail given. The sustainable transport possibilities mentioned are:

- Pedestrians facilities;
- Cycling facilities;
- Dedicated bus lanes;
- A Very Light Railway (VLR) scheme;
- A new railway station.

This is very welcome, but it is clear that the proposed options in the consultation document are principally designed around the motor car. The entire Vectos Detailed Modelling Assessment is dedicated to traffic flows. It takes no account of the potential for the more

³ P8 A46 Strategic Link Road Consultation brochure

⁴ 3.2, p13, Transport Related Air Quality Task and Finish Group report to WCC Cabinet, 24/1/17

⁵ Sloman L Hopkinson L Taylor I (2017) The Impact of Road Projects in England, Report for CPRE and p59, A34 Newbury Bypass Case Study

sustainable possibilities listed above to *replace* the road scheme and to *reduce* traffic flows rather than increasing them. Indeed, the sustainable options are explicitly, although unnecessarily, tied to the road traffic plans, rather than being offered as genuine *alternatives*:

“Additional capacity could also be made available for enhanced public transport opportunities in the future for new and more environmentally friendly modes of transport to be use on the new corridor.”⁶

“Early feasibility work is underway into a possible new railway station and interchange between cycle, rail, bus and VLR services, which could be located close to the proposed link road...The potential new railway station and interchange is being developed separately from this A46 link road proposal and is therefore not the subject of this consultation. However, it should be noted that a new railway station and interchange is unlikely to be brought forward without access improvements resulting from the proposed A46 link road.”⁷

These quotes demonstrate that the proposals in the consultation document are partial, incomplete, and far from integrated with the sustainable possibilities. The detailed Vectos analysis completely fails to account for the sustainable possibilities.

It isn't, in any case, made clear why the sustainable options must or should be tied to a road traffic scheme. If the signatory councils are genuinely concerned about climate change, this must be corrected. Sustainable options should be offered *as alternatives* to the road-based options.

Proposed options unable to meet the stated objectives.

The consultation document sets out 8 objectives. It claims that option 3 would fully meet all of the objectives. This is not borne out by evidence from other studies, and is in fact contradicted by information provided elsewhere by the signatory authorities.

On page 3 above we quoted evidence from WCC's own Air Quality Report that road improvement schemes can lead to induced increases in traffic volume of up to 40% at peak times. The consultation document predicts that traffic volumes would increase by 25% over the next 10 years if nothing at all is done. In other words, a 65% increase in traffic volumes is possible, were the road schemes to go ahead. This induced increase in traffic volumes fundamentally undermines several of the objectives set out in the consultation document.

Local roads would not be immune from increased traffic. The WCC Air Quality Report states that:

⁶ Page 13, A46 Strategic Link Road Consultation

⁷ Ibid.

“Induced traffic is particularly seen on the alternative routes that road improvements are intended to relieve.”⁸”

Rather than the proposed schemes reducing rat running on local roads, the evidence is that the problem would be made worse over time. The proposed schemes cannot meet this objective.

Any short-term benefits that might accrue from options 2 and 3 proposed would be eliminated by increasing traffic volumes over time. This would inevitably lead to demands for even more road building, and yet more traffic. The only sustainable option is to adopt measures that *reduce* rather than *increase* traffic volumes. The objective to maintain journey times cannot be met in the longer term by the proposed road schemes.

In relation to air quality, it should be noted that over 75% of the particulate emissions produced by vehicles are derived from wear and tear of tyres, brake systems, and from the road itself⁹. Even when pollution from petrol and diesel engines is largely eliminated by the move to electric vehicles, increased traffic volumes would continue to degrade air quality.

The area defined by the A46 Link Road consultation document is relatively compact with the majority of the development locations within 3 miles of Coventry City centre. This area is served by 4 railway stations, 5 if the new station for Warwick University is included. Such a position makes it well placed to deliver on an Active Travel strategy.

The capacity of options 2 & 3 to meet the stated objectives is summarised in the table on the following page.

⁸ 3.2, p13, Transport Related Air Quality Task and Finish Group report to WCC Cabinet, 24/1/2017

⁹ P8, Speed Emissions and Health, June 2018, Transport for London, www.tfl.gov.uk

Objective	Assessment against options 2 & 3	Assessment against a sustainable transport option
Maintain journey times on local network following wider A46 development growth	Expected growth in traffic volumes plus induced increases will make this impossible to achieve longer term	Sustainable options would reduce traffic flows and genuinely maintain journey times on the existing network
Support accessible economic development	Expected growth in traffic volumes plus induced increases will damage economic growth longer term. Several studies question the link between road building and economic growth	Sustainable options would reduce traffic flows and help maintain economic development over a longer period of time
Improve network resilience to provide consistent and reliable access	Expected growth in traffic volumes plus induced increases will make this impossible to achieve longer term	Sustainable options would reduce traffic flows and provide more options for consistent and reliable access.
Improve accessibility to University of Warwick	Expected growth in traffic volumes plus induced increases will make this impossible to achieve longer term. The need for additional parking will further degrade the environment	Sustainable and integrated options would provide choice and improved access over the long term
Reduce rat running traffic on local roads	Findings in the WCC Air Quality Report contradict the claim that options 2 & 3 could meet this objective	Sustainable options would reduce traffic flows and relieve pressure on local roads
Improve local air quality resulting from road transport in the area	Expected growth in traffic volumes plus induced increases will make this impossible to achieve even in the short term	Sustainable options would reduce traffic flows and improve air quality
Reduce severance by reducing traffic flows and improving walking & cycling links	Options 2 & 3 would increase the severance of the cycle routes from Kenilworth, and the increased traffic on local roads would make conditions worse for active travel. There would be additional traffic across Gibbet Hill and Westwood Heath Road, again discouraging active travel	Sustainable options would reduce traffic flows and significantly improve the environment for walking and cycling
Enhance active travel by improving walking and cycling links in the south of Coventry	Expected growth in traffic volumes plus induced increases, along with the degraded environment from a dual carriageway, would depress active travel.	Sustainable options would reduce traffic and improve the environment for active travel. Multi-modal integration would enhance this further.

Sustainable solutions could meet all of the stated objectives

Properly integrated, sustainable transport solutions are capable of meeting all of the objectives stated in the consultation document. They would also reduce greenhouse gas emissions, and thereby positively contribute towards each council's climate change targets. Sustainable solutions would genuinely improve air quality, and would maximise active travel by creating a much more healthy and pleasant environment for cycling and walking. Space that would otherwise be consumed by the need for car parking could be devoted to green initiatives and an enhanced environment at the business parks, and on the University of Warwick campus. Overall economic development would be enhanced in the long term, rather than hampered by ever increasing volumes of cars. Pressure on the existing road network would be relieved.

We are confident that a detailed study of sustainable options, comparable in cost and expertise to the design and modelling of the road options, would demonstrate the superiority of alternatives to road expansion.

Conclusion

The A46 Strategic Link Road Consultation is entirely focused on road building, and completely fails to take climate change targets into account. This runs counter to the strategies adopted by all 3 signatory councils. It will also adversely affect other firms and institutions in the area who wish to develop their own climate change strategies.

Options 2 & 3 cannot meet the stated objectives, contrary to what is claimed in the consultation document.

A full climate impact assessment should be carried out, and proposals brought forward for genuinely sustainable options capable of meeting each council's climate change objectives.

Recommendations for action

1. An explicit objective should be added relating to climate change mitigation;
2. A full climate change assessment should be carried out against the revised objectives;
3. Genuinely sustainable options should be developed that explicitly address the climate change emergency;
4. Detailed modelling should be carried out on the more sustainable options;
5. The stated objectives should be properly and fully assessed against readily available evidence from other schemes, and available research findings;
6. The signatory councils should reassess the options, and then carry out a more meaningful consultation.

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