

P-05-886 Stop the Red Route (A55/A494 corridor), Correspondence – Petitioner to Committee, 20.11.20

Response to the request for a submission to the Petitions Committee – STAMP: stop the Red Route

Dear Committee,

Thank-you for the opportunity to respond to this stage in the Committee’s deliberations, for which we are very grateful. We would also like to thank the committee for their hard work in following up the different issues which have been raised as a result of the petition. We also gratefully acknowledge the fair handiness of the committee in dealing with our petition.

In summary, nothing which the Minister has said, either orally during his appearance at Committee on 13 October 2020, or in earlier written representations to the Committee or to others, has answered our concerns as set out in our original petition submission. Indeed, his responses have only served to increase our concern about his damaging and expensive proposed highway scheme.

We have decided that, for clarity and ease of reading, we would go back to the points made in our original petition submission and set out how the Minister has failed to answer the points we made.

Additionally, there have been new developments in recent months, which have further undermined the Minister’s case for the proposed mega-scheme, which we explain below.

Finally, and importantly, we set out a small number of requests of the Committee, which we respectfully request you to consider. We think that these requests are sensible, proportionate and moderate recommendations, which we hope the Committee will be able to agree to.

Original point made to Petitions Committee	Our Assessment of the Minister’s response
<p><i>1) The construction of the new road through ancient woodland, and across the best and most versatile agricultural land contradicts Planning Policy Wales and the Well-being of Future Generations Act.</i></p>	<p>The Minister made a number of key admissions here, namely that the proposed highway would indeed damage ancient woodland, and that that damage would be permanent and irreversible.</p> <p>He furthermore erroneously states that less than 5% of the ancient woodland at Leadbrook Wood would be damaged, thus failing to recognise the extra width of woodland that would be damaged during construction, edge effects, shading effects, indirect adverse impacts and damage to the connectivity of the wood through severing it in two, which would damage a far greater proportion of the wood, and effectively undermine its ecological resilience. This is clearly not in conformity with the provisions of Planning Policy Wales 10, which states ‘All development decisions, either through development plans, policy choices or individual development management decisions should seek to contribute towards the making of sustainable places and improved well-being.’ [Section 2.2] and ‘Planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales.’ [Section 2.8] nor of the Wellbeing of Future Generations Act 'Ways of Working' section, which emphasises the requirement to avoid in the first instance damaging ecological resilience, but instead seeking imaginative sustainable solutions. It is self-evident that there are non-car sustainable solutions to traffic congestion in the corridor.</p>

<p>2) <i>The recently published plans for a new A494 Dee Bridge, widening of the A494 and other improvements will deliver the Deeside traffic improvements without the need for the 'Red Route'.</i></p>	<p>At the Petitions Committee evidence session on the 1st October 2019, the Flintshire County Council representatives (appearing in support of the Red Route) agreed with this point, in stating that the new A494 Dee Bridge and additional works should be carried and their impact assessed once completed to see if the Red Route is still needed.</p>
<p>3). <i>The costs used to justify the choice of the "Red Route" failed to account for necessary upgrade of the Flintshire Bridge. It also does not include the addition of crawler lane at a major congestion point on the A55, the hill out of Northop towards Holywell. Congestion at these points will be made worse by the construction of the Red Route. The underestimate of the costs used imply that the proposed road cannot be considered value for money. Furthermore, the costs do not include the proposed A494 improvements (outlined in 2).</i></p>	<p>Since the petition, estimated costs have already risen from the original 2017 costing of £210 million to £300 million (as of November 2019). These costs still do not include the additional costs associated with work promised to Flintshire County Council (as eluded to by the Minister in his committee appearance on 13/10/20) or relating to the upgrade of the Flintshire Bridge.</p> <p>In his correspondence of the 6th June 2019 the Minister stated that: "We are not anticipating needing to upgrade the Flintshire Bridge".</p> <p>At the 13/10 evidence session, the Minister confirmed that no report had been produced into the viability of the bridge in the context of the increased traffic associated with the Red Route (and in consequent fails to acknowledge any additional costs associated with the upgrading).</p> <p>Furthermore, he brushed aside concerns over the bridge by claiming that the Flintshire Bridge is "future-proofed".</p> <p>This is incorrect, as we set out below:</p> <ol style="list-style-type: none"> a) The bridge was designed over 25 years ago when there was no significant requirement to factor in the impacts of increased storm incidence due to climate change. As the bridge is required to close for safety reasons if wind speeds exceed 55 mph this represents a serious flaw in the bridge design going forward. An analogous upgrade, to the Forth Bridge, Queensferry Crossing, opened in 2017 was estimated to cost in excess of £11 million, and even that may well be inadequate budgetary provision in the Red Route Proposal , given that there are certain additional engineering challenges associated with retro fitting wind shielding to the Flintshire Bridge. b) Furthermore, at the 13/10 evidence session civil servant Andy Falleyn contradicted the Minister in saying some storm-proofing work would be required. c) To expand on the need to factor in climate change into the design, the Thames Barrier (designed to protect London from severe weather) was closed on average 2.2 time a year between 1982 and 2000 (the design and construction period of the bridge), and on an average of 7.75 times per year between 2001-2020. d) During the bridge construction in the mid – 1990s serious issues relating to the underlying geology where discovered in the vicinity of the southern bridge tower (Nichol & Wilson, 2002; Foundation geology of the River Dee estuary cable-stayed bridge, Flintshire, North Wales. Engineering Geology 63, 131–139).

	<p>As such there remain a number of major questions over the viability of the bridge (without upgrading) and so the potential viability of the route without considerable additional expenditure.</p> <p>This confirms our point about the drastic underestimation of the cost of the Red Route– the cost of the Red Route is spiralling out of control</p>
<p><i>The choice of the Red Route was based on unrepresentative traffic surveys.</i></p>	<p>The Minister confirmed in his response of 6 June 2019 that: “In terms of traffic surveys, roadside interview surveys were undertaken in late September and early October 2015, <u>in accordance with national transport appraisal guidance.....</u>” He also confirmed that the traffic projections used in the consultation are based on these surveys. The timing of the surveys (and so the validity of the model) are therefore restricted to pre-COVID commuter traffic and do not account for the major congestion issues associated with holiday traffic – the severity of which the Minister actually acknowledged (in referring to August 2020) in his evidence session appearance on 13/10. All evidence points to the major cause of the holiday traffic issues being associated with the Northop – Halkyn hill to just west of the point at which the Red Route joins the A55. As such the Red Route will clearly only amplify these problems.</p>

Thus in conclusion to this section, it can be seen that the Minister has manifestly failed to answer any of the points we raised in our petition.

Additional Points the Minister has Failed to Answer:

Additionally, the Minister has failed to provide any answers whatsoever to the following points, which have been put to him :-

1. The Impact of COVID-19 on Car Travel:

It is indisputable (and acknowledged by the Minister himself in other contexts), that traffic and work patterns and volumes will change dramatically as a result of COVID-19, including for example the advent of the widespread practice of working from home which the Welsh Government are encouraging. Even during this temporary period before a vaccine is developed, and people are unwilling to use public transport, car traffic is still substantially below pre-COVID levels, and that fall will continue, and accelerate. The Minister’s own department has commissioned work on this, but he has completely failed to take his own department’s work into account in promoting this road scheme. We accept that this work has not been completed yet, but we consider that work on the Red Route should be stopped until it is completed.

2. The Wales Transport Strategy “Y Llwybr Newydd”:

The draft WTS has recently been published, by the Minister’ own department. It establishes a strong presumption against new highway construction, yet the Minister has chosen to ignore his own strategy and plough on with the Red Route.

3. WelTAG – the Welsh Government’s Transport Appraisal Tool:

Similarly, the Minister’s own department has updated the WelTAG to take into account the provisions of the Wellbeing of Future Generations Act and make it more sustainable. Again, the Minister has inexplicably refused to subject the Red Route to his own updated appraisal tool, the praises of which he has loudly sung in other contexts.

Our Requests:

We respectfully request the following of the Committee: -

1. That the Committee make a formal request to the Minister to: -

- a. Pause the project until the advent of the adopted Wales Transport Strategy “Y Llwybr Newydd”, and until the full fallout of drastically-changed work patterns due to COVID-19 have manifested themselves and been fully taken into account.
- b. Pause the project to give a chance for the other appropriate physical and “smart” works programmed on the existing highway network to take effect, in order to judge whether they, in conjunction with the natural fall in traffic volumes, have the desired effect.
- c. Rerun the WelTAG appraisal with the new, fit for purpose WelTAG.

2. Request that the Senedd’s Environment Committee (or it’s successor following the 2021 Assembly elections) convenes an Inquiry into the whole issue, including scrutiny of the whole project, including costs, alternatives and data used to justify the decision to proceed with the Red Route, in the context of COVID19 and the Wellbeing of Future Generations Act.

A Final Word:

The International Panel on Climate Change has called for urgent action to reduce CO2 emissions, saying we have only 12 years left to save the world’s climate. We need to be investing our limited resources in sustainable transport like rail.

Our planet continues to warm, since the start of consideration of this road scheme in 2008 global temperature have risen by an average of 0.2 deg C, CO₂ in the atmosphere has risen from 380 ppm to nearly 420 ppm, sea level has risen by 4 cm, Arctic Sea has entered a state of terminal decline, droughts and wild fires have decimated communities globally, storms have become more severe.

The Climate Emergency is a global problem which the Welsh Government is committed to fighting. Building a new 4 lane highway which they concede will result in more greenhouse gas emissions will only make the problem worse.

Your Sincerely,

Professor Tom Rippeth (Chair, STAMP, Stop the red route)