

**P-05-886 - Stop the Red Route (A55/A494 corridor), Correspondence –
Petitioner to Chair 19.06.19**

**Petition calling on the National Assembly of Wales to urge the Welsh
Government to withdraw its support for the “Red Route” (A55/ A494/ A548
Deeside Corridor Improvement)**

We welcome the Assembly Government’s leadership in recognising the serious threat climate change poses globally through their recent declaration of a Climate Emergency. We also agree with the recent **Prosperity for All: A Low Carbon Wales** document that the ambitious targets necessary for the reduction of emissions requires a fundamental shift in behaviour including *“a modal shift from car dependency to sustainable forms of transport”*.

We further welcome the first First Minister’s decision to scrap the M4 relief road. We note that in reaching his decision he did not question the planning inspector support for the scheme based on value for money and environmental and health grounds (ie. fit to existing WelTAG Guidelines). But that he that he attached *“greater weight than the Inspector did to the adverse impacts that the project would have on the environment”* and that was sufficient to shift the balance to opposing the scheme. As such the Government have effectively set a greatly increased regard against ‘environmental damage’ in assessing development proposals.

The construction of the Red Route will cause extensive environmental damage including the destruction of ancient wet woodland and the destruction and disturbance of many unique natural habitats. This is evidenced by the support our petition has received from many environmental groups including the Woodland Trust and the North Wales Wildlife Trust.

We are told that the Red Route will be to reduce traffic on Aston Hill by **9%** based on today’s traffic figures (or **24%** based on the projections presented for 2037). At a cost of at least £255.4 million (20% of the cost of the M4 Relief Road) we would ask the Assembly Government to reconsider their support for the Red Route and in doing so apply the new *“greater weighting to the adverse impacts that the project would have on the environment”* as applied in the M4 relief road consideration.

The choice of the Red Route as the preferred option was based on the results of a WAG consultation and a previous study (*Reasons for selecting the preferred route*. P14 document WG33176). The consultation was presented as a binary choice between the RED and BLUE routes. We argue that:

- 1) The outcome of the consultation was geographically biased towards those who opposed the Blue route. This point is supported by our petition which was signed by more than 3 x (6 x) times as many people as responded to the consultation and opposed the Red Route. ie. the consultation greatly underestimates the opposition to the Red route and so point 6.2 (*Reasons for selecting ...*) is not valid. **See Section 1 below for detailed evidence.**
- 2) The Red Route costings used in the consultation (Red Route: £255.4m as opposed to Blue Route: £283.0m) were not complete and in consequence the Benefit Cost Ratio presented in the consultation is not correct. Consequently, point 6.3 (*Reasons for selecting ...*) is not valid. **See section 2 below for detailed evidence.**
- 3) The traffic modelling on which the traffic projections used in reaching the decision are not sufficient to show value for money, invalidating point 6.3. **See section 3 for detailed evidence.**

As such the reasons stated for selecting the Red Route as the preferred option (as stated in WG33176) are not valid and so we urge the Welsh Government to withdraw its support for the Red Route.

1) Biased Consultation Outcome

This petition of some 1,500 signatures (1275 online, 150 on paper) opposes the RED route. The petition has been largely supported by residents of Flint, Flint Mountain and Northop indicating strong opposition to the RED route amongst these (non-Deeside) communities. We argue that the original consultation did not provide members of these communities with the same opportunity to respond as it did to Deeside residents (who are more likely to oppose the Blue Route). Our evidence that the consultation outcome was not representative of the views of all the communities impacted by the proposed road schemes is set out below:

- The consultation period was 13th March to the 5th June 2017. Two exhibitions were organised to explain the choice being given were organised in Ewloe (21st-22nd March 2017) and Coleg Cambria (23rd-24th March 2017) both of which have Deeside addresses. We are not aware that these events were particularly advertised to non-Deeside residents.
- The leading question of the consultation was: "*Are you resident in the Deeside area?*" to which **63.3%** of respondents answered yes (WG33176).

- The consultation results highlight a largest cluster of support for the RED Route around the Ewloe/ Deeside area (WG33176, Q13) and area impacted by the Blue route.
- However a substantial number (16,002 based on the 2011 census) of non-Deeside residents are adversely impacted by the RED Route: the residents of Northop, Flint Mountain and Flint (**NB:** Flint Town Council and Northop community council both oppose the Red Route. The traffic modelling presented clearly shows increases in traffic impacting these communities, not to mention a multi-story traffic interchange between Northop and Flint Mountain).
- It was not until the consultation was underway that the omission of Flint and Northop residents was realised (*as acknowledged in the Minister's letter of the 6th June 2019*). A further consultation exhibition to explain the alternative road schemes was organised at **Glyndwr University Northop Campus** but only ran for 1 day, on the 10th May 2017 - only 3 weeks from the end of the (12 week) consultation period. This greatly reduced the opportunity of Northop residents to respond when compared to those on Deeside who had the full 12 weeks. Flint residents had no local consultation despite the likely impacts on their community and strong opposition from Flint's Town Council.
 - **NB:** WG33176 incorrectly states that the Glyndwr Northop Campus event took place on 10th March (before the start of the consultation). It actually took place on the 10th May as confirmed by the Minister.
- The impact of any advertising of the Glyndwr/ Northop event in Flint and Northop was clearly limited given the poor turnout (95 people) compared to the earlier events on Deeside (which attracted nearly 1000 residents) (figures based on Para 5.1 WG33176).
- The impact of the greatly reduced consultation on the response rate from Flint and Northop residents is clearly evident in the limited figures presented in WG33176 (Q13 numbers of responses: Ewloe: 754; Flint & Northop: 152).
 - **NB:** *We note that the figures quoted for attendance at the public consultation vary by a factor of two between paragraphs 3.4 and 5.1 of document WG33176.*

2) Presentation of Value for Money

In the consultation the construction costs were presented as: Red Route £255.4 million and Blue Route £283.0 million. However we argue that the Red Route costs are significantly underestimated due to a number of omissions:

- There are safety issues with the current A494 identified in the Stage 2 study (WG33176 para 2.2 and objective 4). These include *“the alignment of the A494/A55 junction at Ewloe and highway layout on the A494, including several junctions”*. The correction of these issues is included in the costing of the Blue Route but not the Red Route.
- However, as the construction of the Red Route will only reduce traffic flow by an average of 9% on the A494 (when comparing to today’s figures) the correction of the A494 safety issues will still need to be carried out, in parallel with the construction of the Red Route. As such these costs need to be added to the cost of the Red Route.
- The additional costs associated with the upgrade of the Flintshire Bridge have not been included. We understand that a £500,000 survey of works required to upgrade the bridge to accommodate the Red Route have already been carried out. We note from the Minister’s letter of the 6th June 2019: *“We are not anticipating needing to upgrade the Flintshire Bridge ...”*. This is not what we have heard from Flintshire County Council. Perhaps he could reassure us by providing us with a letter in which he clearly states that there will be no costs for works the Flintshire Bridge, to Flintshire Council Taxpayers or to the Assembly Government, associated with the construction of the Red Route?
- As the Minister states in his letter, the A494 Dee Bridge renewal scheme (an uncosted part of the Blue Route) is shortly to go ahead irrespective of proposed route selected. (Although the Minister does not appear to believe the widening of the A494 will not solve Deeside traffic congestion problems)? It would make sense to wait and see, and to assess the impact these works have before committing to spending a further quarter of a billion pounds on either the Blue or the Red Options?).
- The addition of these significant extra costs to the total Red Route cost would make this route the more expensive and also impact the benefit-cost ratio given.

3) Inappropriate traffic modelling assumptions invalidate WelTAG Guidelines for value for money

We thank the Minister (6/6/2019) for confirming the information we have received regarding the traffic projections, ie. that forecasts for the two routes are based on day time, week day traffic surveys, outside of holiday times, using standard assumptions as recommended by national traffic appraisal guidance. The accuracy of

the traffic modelling is therefore dependent on the applicability of these 'standard' assumptions when applied to modelling A55/ A494 traffic flow.

However we argue traffic flow on the A55/ A494 does not conform to standard flow patterns as these roads provide the main access to popular tourist destinations (North Wales coast and Snowdonia) and also forms part of the Euro-route E22 linking the Ports of Hull and Holyhead.

The personal experience of the petitioners is that, aside from accidents, the heaviest traffic tends to occur at weekends and during holiday periods. We note from the Minister's letter that the traffic flow model has not been validated for these busy periods and so the model predictions cannot be trusted for the busiest times.

The main reason for the holdups is that there is a long hill west out of Northop towards Holywell (see figure 1). We note from the Minister's letter he concedes that this is an issue, but that there is no firm commitment to a 3rd (crawler) lane on this hill to help alleviate this problem. A persistent problem linked to the hold-ups on the section of the A55 between the Ewloe Interchange and Holywell are major traffic hold-ups in Flint (as shown in figure 1).

We are surprised to note that the traffic forecasts and journey times provided in the consultation do not appear to consider the impact of the hill westbound, despite its proximity to the proposed Northop Interchange (see figure 1 below).

Given the A55/ A494 form part of the Euro-route E22 with some 500 lorries passing each way (to/ from Holyhead) daily, 99% of which are linked to trade with the EU (Freight in Wales Statistics 2014) we find it very surprising, given the cost of the Red Route, that no consideration has been given to the impact of BREXIT on traffic flow.

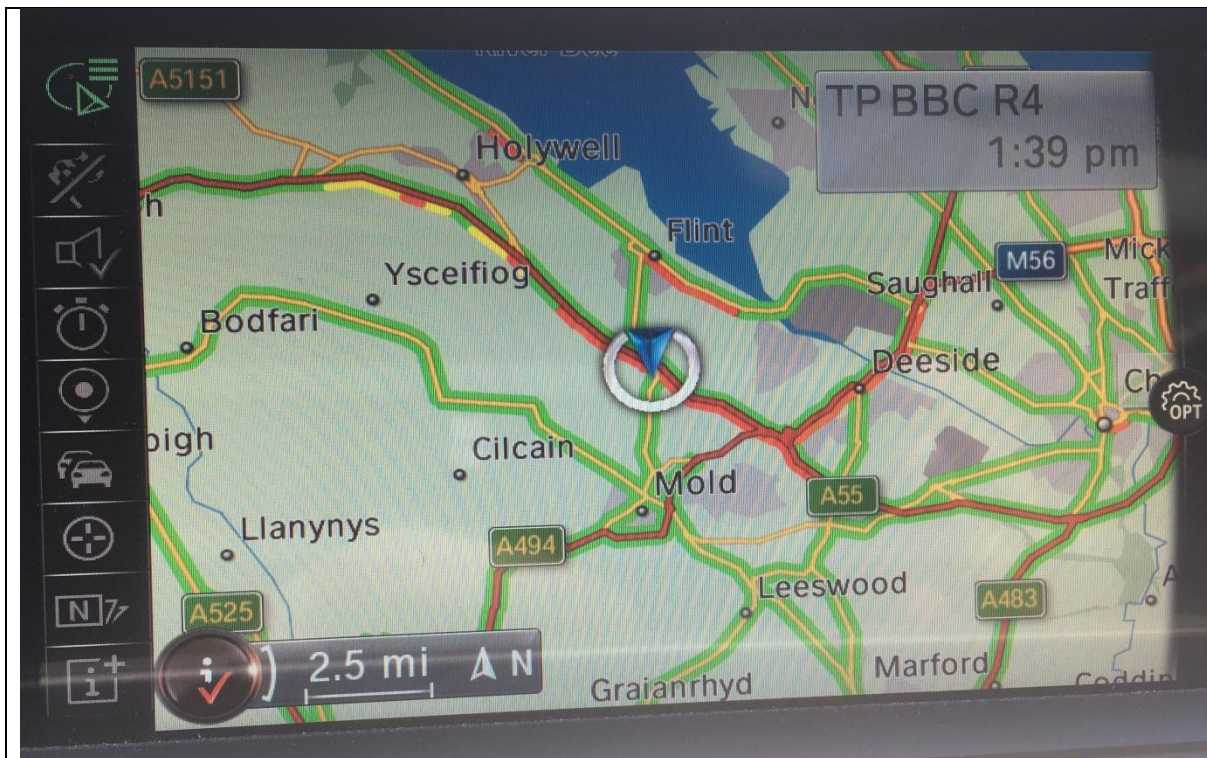


Figure 1: Traffic flow in north east Wales on Saturday 20th April. The sections of road coloured red indicate major traffic hold-ups. The silver circle with the arrow indicates the point at which the proposed Red Route will feed west bound traffic onto the A55. Note that the west bound traffic is held up some 3 miles beyond proposed Northop Interchange. Also note the 3 mile tailback into Flint.

In conclusion we argue that the public consultation outcome, costs used in the consultation and the traffic projections used in the consultation, on which the Assembly Government's decision was based, are flawed and as such the Assembly Government should withdraw their support for the Red Route.