

P-05-886 Stop the Red Route (A55/A494 corridor), Correspondence – Petitioner to Committee, 29.01.20

Petitioners Response: P-05-886 - Pwyllgor Deisebau 21.01.20 / Petitions Committee 21.01.20

We thank the committee for the opportunity to respond to correspondence arising from our evidence session in front of the committee in October 2019. We apologise in advance for the rushed nature of this response and that we have not been able to cover all aspects of the discussion.

In considering the correspondence provided we would like to make the following comments:

- A) In his response to the committee, the minister makes the admission that the WelTAG process was carried out pursuant to WelTAG 2008 i.e. before the 2017 revision. Furthermore, there is no indication that the advent of WelTAG 2017 has had any demonstrable impact on the evolution of the scheme.

This point is also raised in the correspondence between the minister and the Future Generations Commissioner, Sophie Howe. She highlights that the way in which WelTAG has been carried out by the Welsh Government in this case (and in a number of others) means that it has effectively retro-fitted the process to an already-made decision to go ahead with one of two highway options. In his response the minister hints that old schemes will move over to WelTAG 2017 “*at an appropriate stage*”. However, he provides no indication of (a) when this will happen, (b) what the definition of an ‘old scheme’ is, and (c) which stage is deemed “*appropriate*”?

We note that the overarching “plan” stage of the evolution of this project, the Wales Transport Plan (WTP), is somewhat out of date, having being published in 2008. We welcome the fact that the minister commits himself to “updating” the WTP. We are, however, disappointed to note that again he fails to set out a timetable as to when this update will take place.

We argue that it is timely for the Welsh Transport Plan to be fully updated in the light of new thinking in transport over the past 12 years and *inter alia* the Well-being of Future Generations (Wales) Act 2015. **We call for this to take place before any further work is done on the Red Route scheme.**

We also note that Sophie Howe raises concerns that the new provisions of the Well-being of Future Generations Act, in terms of “ways of working”, have not been adhered to in generating highway-only options such as this one. We are disappointed that the minister has failed to answer this criticism in his response, instead choosing to name-check various workshops and training days which the Welsh Government has funded. We also note that Sophie Howe recommends that no proposed transport schemes should be funded unless they have gone through a fit for purpose WelTAG (which by definition would have to be Well-being Future Generations Act-compliant). **On the basis of this information we argue that the scheme has not gone through a ‘fit for purpose’ WelTAG, and so cannot be funded within present day Welsh Government legislation.**

B) With regard to traffic modelling the minister provides no further evidence to build confidence that the abnormalities of traffic flow (in particular the seasonality of the flow) have been accurately forecast by the traffic model on which the route selection was based. To the contrary the minister acknowledges the flaws in the traffic modelling by conceding that: "If a decision is made to progress with the scheme further, the traffic modelling and economic appraisal for the preferred option will be updated to take account of current guidance and traffic growth". **Given this admission we are concerned that the original consultation and consequent decision was based on poor information and so should be revisited.**

C) Further, an issue the minister often raises in his support of the Red Route is air quality on the A494. We note from recent press coverage that this issue appears to have been solved by the minister. In quoting interim data on the 5th October 2019 the minister stated that the first 12 months of the 50 mph speed limit on the A494 in Deeside has shown a significant reduction in NO₂ levels. He also stated that "we believe that as a result of putting the average speed cameras in, we will see further reduction in nitrogen dioxide." [BBC and Deeside.com].

He then goes on to state "and so for the shorter term, at least, whilst we undergo the transition to ultralow emission vehicles we need to do something". **This is clear indication of the pace of technological change and underlines the need for an up to date review the Red Route decision in which the impacts of rapidly emerging technological developments are considered.**

D) In point (4) of his response to the committee, the minister states that non-car alternatives to the two highway options were examined primarily at the "Planning Stage". However this was in 2010. Given the £300 million price tag attached to this project, and the major advances in traffic management, such as the development of smart technology in the 10 year period since the non-car alternatives were considered **a serious question is raised regarding value for money of this project.**

E) With regard to the additional works requested by both panels at the October evidence session, i.e. a Halkyn Hill crawler lane and safety work on the Ewloe Interchange, we note the minister's states there are no plans to "realign and rationalise the existing junctions or to remodel the Ewloe interchange". **Given a key objective (4) of the Dee corridor plan is to improve safety at this junction this omission suggests that the project as it currently stands is highly unlikely to meet its stated objectives.**

F) The minister responded to statements from both parties at the evidence session regarding the general state of public transport in North Wales with a reiteration on his "North Wales Metro", which by definition is an integrated public transport system. He states that small amounts of money are so far committed to the scheme (approx. 4% of the estimated Red Route cost) and outlines the limited progress made. Furthermore, in our view he fails to show the contribution of the Red Route to the North Wales Metro.

As local residents, we should like to draw the attention of the committee to the reality of public transport in North East Wales: over the past 3 year we have lost a number of valued local bus services, including the X28 in 2019, which linked Flint, Northop, Mold and

Wrexham. The frustration of Flintshire residents at the decline of local services has very recently been highlighted in a petition to your committee (P05-899: Buses for people not profit) which calls for bus services to be run to meet the needs for local people.

The situation on the railways is not much better, with the systematic cutting of North Wales Coast commuter time train services stopping at Flint and Shotton stations. The frustration of local commuters is currently highlighted by a further petition to your committee (P04-627: Improve commuter train services for North East Wales residents). The minister talks of improvements to Shotton Station, however he fails to point out that at peak times less than one train an hour stops at Shotton on the Holyhead-Chester line!

- G) The minister in his response to the committee once again repeats his previous correspondence regarding the geographic spread of the consultation responses. However he continues to fail to actually provide quantitative evidence to counter our concern that the consultation events favoured residents of Deeside, despite respondents' postcodes being collected as part of the consultation questionnaire. He clearly has the information at hand so we wonder why he hasn't made it available.
- H) We note the escalating costs of the Red Route proposal recently quoted in the media (Deeside.com 16/11/2019), based on the Wales Infrastructure Investment Plan. This put the new figure at £300 million (an increase of £44.6 million over the 2017 consultation figure) due to "inflation" and the omission of VAT in the original estimate. As this figure is now larger than the estimated cost of the Blue Route we wonder how this may have impacted the consultation outcome.

We are concerned to read in the correspondence from Natural Resources Wales (13/07/17) which states that: "The Red Route is likely to require substantive acquisition of land for compensation and this requirement does not appear to have been critically or effectively considered. If the Red Route is progressed, the identified costs should include costs relating to the replacement of the Dee Bridge and the A55/A494 interchange – clarification of whether this has been included is required." **These concerns re-missing costs was raised in 2017. We expect that these costs have now been added to the estimate and request an updated figure for the cost of the Red Route.**

- I) We note that of all of the Deeside companies approached for their views on the Red Route only one response has been received, from Iceland. This lack of response suggests that support of the Red Route is weak amongst those companies, and provides no evidence to support the claim made by the North Wales Ambitions Board Representative, at the evidence session, that Deeside traffic congestion creates difficulties in workforce recruitment. The Iceland response provided little more than a personal opinion with no quantitative evidence in support.

With Best Wishes,

Tom Rippeth on behalf of the petitioners.