Community Planning Alliance

NATIONAL HIGHWAYS RIS3 CONSULTATION

29 December 2021

The ultimate goal of government should be that no new road capacity is added to the network.

The Austrian government has made that decision just this month. Austrian Environment Minister, Leonora Gewessler, said, *"The fight against the climate crisis is our historic duty... More roads mean more cars, more traffic"*, adding that she did not want to leave children a future *"full of cement, full of destruction"*.

LOOK AT THE BIGGER PICTURE FOR THE PUBLIC PURSE

However, in the event that RIS3 does move forward, it is imperative that the way projects are assessed, and decisions made, is updated.

It is imperative that the shift towards electric vehicles is not used to avoid the analysis we set out below. Electric vehicles create emissions and congestion. Road building for any vehicles releases enormous quantities of carbon dioxide during construction. Road building for any vehicles destroys habitats and species. Electric vehicles are currently out of reach financially for many.

RIS3 (or any road-building) assessments must include the following:

THE COSTS OF EXTERNALITIES

I. ILLNESS OR DEATH FROM AIR POLLUTION.

Public Health England found, in 2019, that:

> *"Air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma."*

This is what the report said about transport interventions:

> *"Strategies that deliver the highest public health benefit relative to transport are actions or interventions aimed at reducing the use of polluting forms of transport, such as low emission zones and road pricing. The DfT's British Social Attitudes Survey 2017 indicated there is a strong majority agreeing that car use should be reduced, but almost half of*

respondents indicated they felt there was no point in reducing their own car use unless others did the same. Pricing measures are effective, particularly in the case of low and integrated fares, which facilitate greater public transport use and help reduce social exclusion, and congestion and parking charges, which can help reduce car use. Active travel interventions, such as promoting walking and cycling at limited scale, do not generally improve air quality significantly; however, there are proven public health and environmental benefits from the added physical exercise, noise reduction, climate change mitigation and greater road safety and community cohesion."

II. ILLNESS AND DEATH CAUSED BY NOISE POLLUTION.

Studies in Scandinavia have shown that noise from roads is a slow killer – via stress, heart disease and diabetes. Every year between 200 & 500 Danes die from road noise. Noise maps must be an obligatory part of RIS3 planning, and the cost of illness and deaths associated with new road noise must be taken into account.

III. ROAD DEATHS AND ACCIDENTS.

In 2019, there were 1,752 road deaths and around 153,158 casualties. (2020 figures were lower due to lockdowns)

NATURAL CAPITAL ACCOUNTING

Natural capital accounting must be used to establish benefits of habitats which will be lost if projects go ahead. An assessment of the value of all land at risk from new road projects should be carried out. However, in addition, the natural capital value of land to be lost to these projects needs to be taken into account. The Treasury Green book sets out how, with links to a DEFRA natural capital calculation tool.

The cost of offsetting must be factored in to decision-making. If less habitat is destroyed, the off-setting costs will be lower, and the natural capital benefits higher.

FOR EXAMPLE

Cost of road	Natural capital value of land taken by road	Carbon offsetting cost (construction & operational phase)	Habitat offsetting	Cost to NHS of air & noise pollution over lifetime of road	Cost of NHS of road injuries (road lifetime)	Economic benefit of road	Overall cost:benefit ratio
£100m	£?m	£?m	£?m	£?m	£?m	+£400m	?

ALTERNATIVE SCENARIOS

Alternative transport options must be directly compared with road proposals. WEBTAG guidance expects this anyway.

Costs and benefits including the health benefits of active travel and public transport and the resultant savings for the NHS must be analysed.

A government study into the economic benefits of walking & cycling calculated health benefits, alongside other benefits such as savings in travel time, congestion and accidents. It found that the typical benefit-cost ratios are considerably greater than the threshold of 4:1 which is considered by the Department for Transport as 'very high' value for money. This supports the conclusion that small-scale transport schemes can really deliver high value for money.

Feasibility and costs of improving the existing road network and adding public transport & active travel capacity must be investigated, together with the use of workplace charging schemes or road-pricing to enable this.

Where alternatives exist already (e.g. the under-used, electrified Colchester-Clacton rail line in north Essex) or are being built,(e.g. HS2) then all opportunities and incentives to shift road traffic onto those alternatives must be explored.

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ABOUT THE COMMUNITY PLANNING ALLIANCE

The Community Planning Alliance was founded in March 2021, with an interactive map[1], on which over 550 groups & individuals campaigning against inappropriate development across the UK have now self-listed. The map has been viewed 205,000 times and we have 2,000 members of our Facebook group. In July we were formally constituted as an unincorporated association. Our aims are:

1. SUPPORT groups in their campaigns and level the playing field;

2. LOBBY for a better planning system which protects nature, involves communities in decision-making and delivers the right homes & infrastructure[2].

Interim website: https://grassrootscampaigns.weebly.com/

[1] Community Planning Alliance: grassroots map - Google My Maps

[2] Homes, in the right numbers, in the right places, which are green, affordable, and accessible by sustainable transport.