



M271/A33/A35 Redbridge Roundabout Improvement Scheme - Climate Conversations response

Please note: This was not a statutory consultation.

This response was submitted through the new citizen space consultation system (an online survey system) and therefore the response below was copied into the online form.

Consultation deadline: 16th December

Consultation documents: https://highwaysengland.citizenspace.com/he/m271-a33-a35-redbridge-roundabout/consult_view/

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1. As the Highways England Redbridge Roundabout Improvement Scheme is concerned with road transport to Southampton Port, there will necessarily be an impact on air quality in the Southampton area. We are still waiting for further information from Highways England in relation to air quality modelling for the scheme. The questions asked were as follows:
 - a. We are interested in the following statement in the Q&A document: "The modelling undertaken indicates that there would be a slight benefit in air quality, as reduced congestion resulting in a reduction in vehicle emissions." Please could you provide a) the output of this model; b) information on the model used; and c) the methodology used, including any assumptions, as we would like to understand how the model was used to produce the reported data.
 - b. Has any real-time air quality monitoring been carried out in the area? If so, please could you provide the relevant monitoring data. (In Southampton we do not know the true extent of the problem due to a lack of continuous and real-time monitoring. As per Figure 3 in the 'Air Quality Plan for the achievement of EU air quality limit value for nitrogen dioxide in Southampton Urban Area (UK0019)', the Government's plan is based on data from a single NO₂ monitoring station. (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/485709/air-quality-plan-2015-southampton-urban-area-uk0019.pdf.)
 2. The air quality modelling is of specific interest due to the concerns raised in the High Court case on the Government's Air Quality Plan. As Client Earth submitted in its skeleton argument to the High Court (<http://www.documents.clientearth.org/wp-content/uploads/library/2016-10-18-clientearth-v-ssefra-high-court-case-skeleton-argument-ce-en.pdf>) "...it is clear from the materials disclosed that Defra officials, as well as experts whom they have consulted have consistently raised concerns about the limitations of the model used, including its reliance on COPERT emission factors." In the High Court Mr Justice Garnham stated that ministers knew that over optimistic pollution modelling was being used. (<http://www.clientearth.org/major-victory-health-uk-high-court-government-inaction-air-pollution/>). If Highways England used the same model and emission factors then it is likely that the results achieved are also "over optimistic" and therefore there would be no benefit or even a further decline in air quality from implementing the scheme.

3. A further decline in air quality would be extremely detrimental to the residents of the Redbridge neighbourhood as this is an area of multiple deprivation. It is important to deal with air quality across the UK, but especially in the most deprived areas of the UK as: *“Air pollution has a disproportionate effect on low-income and ethnic minority groups. The most deprived 10% of areas in England are subject to 41% higher concentrations of nitrogen dioxide from transport and industry than the average.”* (<http://www.clientearth.org/reports/air-quality-briefing-ADPH.pdf>)
4. In fact, more stringent limits on air pollution should be implemented in order to recognise that “subpopulations may be at considerably increased risk of suffering adverse health effects”. (<http://jech.bmj.com/content/58/1/3.full>) For example, children, the elderly and sick, and those living in deprived neighbourhoods where residents are subject to much higher levels of airborne pollutants. Please also note this quote from a Defra report: *“there are a higher proportion of children in the most deprived deciles in England where higher concentrations of NO₂ and PM₁₀ tend to be observed.”* (https://uk-air.defra.gov.uk/assets/documents/reports/cat09/0701110944_AQinequalitiesFNL_AEAT_0506.pdf)
5. There is a great deal of recent research which highlights the serious impact of air pollution on health and which needs to be brought to the attention of policy makers. For example:
 - a. Exposure to traffic-related air pollution and risk of development of childhood asthma: A systematic review and meta-analysis (Nov 2016) (<http://www.sciencedirect.com/science/article/pii/S0160412016307838>)
 - b. Traffic-related air pollution exposure is associated with allergic sensitization, asthma, and poor lung function in middle age. (May 2016) (<https://www.ncbi.nlm.nih.gov/pubmed/27372567>)
6. The original, legally binding deadline for the UK to meet air quality targets was in 2010. Air pollution is causing a public health and environmental crisis - the Government can no longer drag its feet over the issue.
7. This consultation must therefore be viewed within the context of other local consultations which relate to air pollution and this area of Southampton - the ABP Master Plan (2016-2035) and Defra’s Clean Air Zones. This is in addition to the aforementioned High Court judgement which now requires the Government to produce a revised Air Quality Plan by July 2017. As the Redbridge scheme will affect air quality in Southampton there are legal grounds for requesting that it be reviewed.
8. It must be noted that port operations are already a significant contributor to air pollution in Southampton, not only through shipping emissions but from road transport to and from the docks. This is evidenced in ‘Western Approach AQMA air quality assessment for Southampton - Baseline study to support LEZ feasibility assessment & development of mitigation measures’ which states (p3): *“This part of Southampton has a large effect from the port operations ... HGV fleets are significant contributors. In the centre of the AQMA around Millbrook Road, the port is a large NO_x contributor, indeed it is as large a source of NO_x as road traffic at some locations. [...] There is a significant flow of HGVs serving the port”* (https://www.southampton.gov.uk/policies/Low-emission-zone-study-July-14_tcm63-376002.pdf)
9. It is clear from the consultation brochure that the main driver for this scheme is to improve traffic flow to the port: *“Maintaining a well-functioning transport network is vital to the competitiveness of the port and the continued development and success of Southampton.”* The ABP Master Plan (2016-2035) states that 60% of containers are transported to and from the port by road (para 2.24). In addition, it is stated (para 6.21) that there is an *“overall continuing trend of growth in container traffic through the port”*. (http://www.southamptonvts.co.uk/Port_Information/Commercial/Southampton_Master_Plan/). Furthermore, the Master Plan notes that the port has

experienced significant growth in cruise passengers, handling of motor vehicles and container traffic (2005-2015) and expects growth to continue over the next 20 years. Therefore, has the air quality modelling carried out by Highways England taken into account the continued growth of port operations?

10. In addition, Department of Transport projections show a 25% increase in traffic by 2040 (Fig 3.2, Road Traffic Forecasts 2015 (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/411471/road-traffic-forecasts-2015.pdf). Air quality modelling should also take these projections into consideration.
11. The air quality issues for this area of Southampton come not just from tailpipe emissions but road abrasion and ship-to-air emissions from the port. Increased capacity means larger container ships (and vice versa), with increased air pollution from these sources.
12. The Government has already stated that it would support the renewed Dibden Bay scheme to expand Southampton Port, despite serious environmental issues relating to both biodiversity and air quality. This decision has also been taken out of the hands of the local planning authority and is now subject only to approval by the secretary of state. (<http://www.bbc.co.uk/news/uk-england-hampshire-37791314>). This is supported by the National Policy Statement for Ports (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3931/national-policy-statement-ports.pdf) which states that *“3.3.1 The Government seeks to encourage sustainable port development to cater for long-term forecast growth ... thus contributing to long-term economic growth and prosperity.”* However, air quality is not mentioned in the list of policies relating sustainable development of ports in paragraph 3.3.3 of that document.
13. Port development has been given the green light despite the statement that: *“In the event that a project will lead to non-compliance with a statutory limit, the decision-maker should refuse consent.”* (para 5.7.7) We refer once more to the Client Earth case in the High Court and submit that the Secretary of State has a legal obligation to refuse consent for expansion of Southampton Port and the associated Highways England scheme for Redbridge Roundabout should also not be permitted.
14. It was stated at the public exhibition on the Redbridge scheme that the main economic benefit from the project would be around £150million in ‘time-savings’. We are also waiting for clarification from Highways England on this issue: We are very interested in how this was calculated - please could you provide us with a breakdown? For example, who would benefit and over what timescales; and the basis for these calculations. Considering that the ‘need for the scheme’ is to improve HGV access to Southampton port, the main beneficiary appears to be port operations, rather than residents of Southampton, at a significant cost to their health.
15. A recent report by The Royal College of Physicians (Every breath we take: The lifelong impact of air pollution) finds that no level of exposure to these toxic gases and particulates can be thought of as safe. The report asks whether the cost outweighs the benefits to public health: *“The reality is that agreed standards often incorporate considerations of practicality, i.e. by how much is it economically reasonable to reduce emissions?”* (<https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>)
16. It is stated on the Highways England website for the scheme that the project would cost £25million. We submit that this public money should not be used to benefit privately-owned port operations, at a significant cost to public health, but rather on:
 - a. Significantly reducing the air pollution from local motorways. Southampton not only has the port and airport contributing to poor air quality but is bounded by the M27, M271 and M3. The Government is aware of the air quality issues arising from motorways due to its consultation on Air Quality Mitigation for the M3: (<https://www.gov.uk/government/consultations/m3-junctions-3-to-4-air-quality-mitigation-60->

mph-speed-limit). These measures were not taken forward at the time, but the National Institute for Health and Care Excellence (Nice) has recently stated that variable speed limits and average speed checks should now be put in place across the UK motorway network in order to tackle air pollution: (<http://www.independent.co.uk/news/uk/home-news/motorways-variable-speed-limits-cut-auto-emissions-air-pollution-a7449516.html>)

- b. Sustainable transport initiatives that would have a positive impact on air quality in Southampton. For example, protected cycleways such as this one: <https://at.govt.nz/cycling-walking/auckland-cycle-run-walkway-maps/nelson-street-cycleway/>.
17. The plans for highways, ports, airports and other city developments must be developed or revised alongside national and local air quality strategies and policies. Similarly, national plans on air quality should reference large infrastructure projects and take into consideration how these might impact air quality goals.
18. Finally, we hope that the Government will take heed of the conclusions of the Environmental Audit Committee which found that *“The Treasury tends not to take full account of the long term environmental costs and benefits of decisions which would reduce costs for taxpayers and consumers in the long run.”* (<http://www.parliament.uk/business/committees/committees-a-z/commons-select/environmental-audit-committee/news-parliament-2015/sustainability-treasury-report-published-16-17/>)

We hope to receive the answers to our questions within the time limit stated in the email from Highways England i.e. 15 working days. Our email was sent on 29th November 2016.