

Friends of the Earth question to Calder Ward Forum 2nd February 2021 about the impacts of the A646 CIP on Hebden Bridge air quality, and the Calderdale officers response

Dear Calderdale transport officers

Thank you for the response you provided to the question I submitted to the Calder Ward Forum yesterday (appended), and the easiest way for me to respond is by annotating your text - yours is the ordinary font, and the Friends of the Earth comments are in **bold**.

Calderdale officers: Tackling poor air quality is a priority for Calderdale Council **Except that for 14 years air pollution in the Hebden Bridge air quality management area (AQMA) has remained at unlawful levels, and I'm not aware of any proposals coming forward from the council's AQ strategy that will result in lawful air quality in the AQMA, despite the fact that in February 2018 - 3 years ago - the Supreme Court gave the government an ultimatum to ensure AQ everywhere became legally compliant, and that a recent coroner's verdict for the first time attributed a cause of death to air pollution. From what follows in your response I can only assume that you are now asserting that the A646 corridor improvement programme (CIP) is in fact Calderdale Council's strategy to achieve lawful air quality in the Hebden Bridge AQMA.**

In which case where is the modelling evidence that proves that the CIP interventions, which you accept (see below) will result in *increased* road traffic, will nonetheless also be accompanied by *reduced* air pollution? The council should have undertaken that modelling as part of the CIP proposals' development and it didn't. However the Council must also balance this against the need to support the local economy. **You will know that the Supreme Court stipulated that transport authorities *cannot* argue that competing strategic priorities (such as 'support the local economy') can override their obligation to meet AQ limits** The restricted geography within Hebden Bridge and the Calder Valley means that there are no alternative arterial routes along which to divert the significant traffic flows along the A646. **In which case why deliberately plan to increase those flows?** The A646 Corridor Scheme seeks to nudge people towards using active modes by focusing on small scale infrastructure improvements for pedestrians, cyclists and public transport users. **I'm afraid this is the sort of misinformation often provided by transport planners when promoting road capacity schemes, implying that the principal beneficiaries will be public and active transport users. You know well that increased road (and parking) capacity will generate more traffic, and that the principal CIP beneficiaries will therefore be private vehicles which are the overwhelming majority of road users.**

Scheme proposals in Hebden Bridge include:

- Removal of parking bays on Market Street, to be replaced with limited waiting restrictions (to allow for loading) **But what about the increased speeds that removing these obstacles will permit? You know that the CIP proposals at present do not include compensatory interventions to prevent a consequent increase in road danger;**
- Ban of right turn movements from Crown Street to New Road (A646). **When FOE first proposed the Hebden Bridge pedestrianisation scheme in the mid 1990s I suggested this be considered, so it's to be welcomed;**
- Improvements to footway along the eastbound carriageway between Station Road and Albert Street junction on Burnley Road/New Road (A646) **Actually the footway widening at this location should be on the other side of the road (the westbound carriageway) where at present there is no pavement at all. This was pointed out in the CIP consultation comments, and that's been ignored;**
- Upgrading of the signalised crossing adjacent to the Station Road junction with Burnley Road, including significant footway widening;
- Improvement to the informal crossing (dropped kerb) at Commercial Street junction with Burnley Road (A646);
- Parking restriction along Burnley Road east of junction with Station Road, to be replaced by a widened shared use footway (pedestrian and cyclist) eastbound, and formalised cycle lane westbound **I'll comment on this below, but merely point out here that the eastbound**

cycleway would the *third* cyclepath now being provided in parallel with each other at this location: the others being the canal towpath recently improved by the WYCA funded City Connect programme, and the path on the other side of the river;

- Provision of new car park at the former adult learning centre site on Stubbing Holme Road with infrastructure for EV charging bays and a link onto the canal to provide a traffic-free route into the town centre. **In practice what you're arguing here is that both car park users *and* Stubbing Holme residents should now walk into Hebden town centre via the canal towpath, and not across the narrow river bridge with inadequate pavements that you're proposing to flood with traffic accessing the proposed car park or via Market Street whose shops this proposal was meant to be supporting.**

The footway widening is expected to influence a reduction in speeds of vehicles entering and exiting the 20mph area. Removal of the on-street parking is particularly aimed at removing a pinch-point for larger vehicles including buses. **These two interventions contradict each other: the second sentence says the available highway has to be widened to remove a pinch point for larger vehicles (not true: there is no 'pinch point', because this stretch of the A646 is one of the widest between Halifax-Todmorden), but the first sentence states that you then intend to narrow it again. The real reason why parked cars are proposed to be removed from the A646 Mayroyd section is that this will allow some marginal time savings to be fed into the business case for the scheme in an attempt to tip this positive.**

The proposed car park at Stubbing Holme is intended to offset the currently unrestricted parking along Burnley Road, heading towards Mytholmroyd and also loss of on-street parking as a result of the flood alleviation scheme that is currently in development. **Where is that loss of on-street parking?** The car park itself is not expected to generate additional traffic in Hebden Bridge as a whole but will create parking at the western end of Hebden Bridge which should lead to a better distribution of parking spaces, with existing parking provisions clustered towards the east and around Hangingroyd Lane/Valley Road. **First let's note that you haven't set this particular car park proposal in the context of the Council's own overall transport strategy which quite properly seeks to constrain additional car parking provision. Yet at the moment Calderdale and WYCA are proposing to increase the number of new physical off-road parking spaces in Hebden by over 100 (62 at Vale Centre, 45 at the station), an increase of around 25%. It won't be well known that Calderdale Council started a Hebden Bridge parking review in 2017 but never completed it.**

Second, if the Council wants to 'create parking at the Western end of Hebden Bridge so as to create a better distribution of parking spaces', why have Calderdale officers persistently refused to apply charges to the existing council 30+car park at this same location, so consequently it's not available for public use? Your proposed intervention in the Stubbing Holme area - to provide even more *physical* spaces: nearly 100 in total - will take up scarce sites which the council's own transport strategy says would be better allocated to such as housing. Thirdly you must be claiming that the parked vehicles displaced from the A646 at Mayroyd (which my surveys demonstrated are substantially lower paid town centre employees, who want to access free parking) will somehow transfer to park on the other side of town at short stay rates. That's one contradiction; another is when you argue (next paragraph) that instead the new car park will be occupied by shortstay users travelling from the west. It can't be both.

Finally, whatever the strategic considerations leading Calderdale Council to decide it wants to provide a 62 space shortstay car park on the western side of Hebden, the overwhelming question that would still need to be addressed is: is this particular location suitable for that use? The obvious answer is that it's not - because of its poor access at the narrow Stubbing Holme Road/A646 junction, and then on across the river bridge; the potential consequently for queueing on the A646, thus defeating the purpose of the CIP to remove 'stop start' manoeuvring; and consequently again the potential for air pollution at the heart of the AQMA to be made worse. Where is the evidence that the council has considered any of these issues - because they weren't included in the documents supporting the car park planning application, or in the assessment of it prepared by the LPA officers. Do you think it's acceptable professional

practice to deal with problems of this seriousness by ignoring them? If an assessment of these issues has been undertaken, will you publish it and make it available to councillors and the local community?

In terms of air quality the removal of pinch-points due to on-street parking will reduce the frequency of stop-start traffic flows through the town centre that currently results in higher emissions due to accelerating vehicles. **I'm in favour of reducing stop-start traffic flows as long as this is achieved without generating more traffic and road danger; but, as I've pointed out above, what the CIP does is simply to move the location of those manoeuvres 100 yards down Market Street, to the Stubbing Holme Road junction** Provision of parking at the western end of the town centre will reduce the need for vehicles travelling from that direction to circulate around the bulk of the Air Quality Management Area looking for parking spaces. **As per my comments in the previous paragraph: I thought the stated justification for this car park is that it's for displaced A646 Mayroyd users? But, above all, if the council is arguing that the net consequences of the CIP interventions will be to sufficiently improve air quality in the Hebden Bridge AQMA so that it finally reaches lawful levels, will you publish the modelling evidence that proves this - because I don't believe it's been undertaken - and identify the year by which air quality in Hebden Bridge will finally reach legal levels?**

With regard to the impact of the Corridor Scheme on overall traffic flows, the proposed right-turn restriction on Crown Street and the removal of parking bays from Market Street and Burnley Road are expected to reduce conflict and thus improve flow (consistency) and thus also the capacity of the network. As such the traffic modelling carried out as part of the business case development for this scheme shows that as the greater capacity is taken up over time the do-something scenario inevitably shows greater volumes of flow in future scenarios. **I'm glad that, after years of questioning from FOE, Calderdale officers are for the first time publicly acknowledging that the impact of the CIP will be to increase the level of road traffic. You know that the figures I've been quoting (+14% at Mayroyd, and +7% on Market Street [and similar levels of increases in other town centre sections]) were from a spreadsheet I was finally able to obtain from Calderdale officers in September 2020. These 'greater volumes of traffic flows' will have all sorts of implications, almost all negative for the environment, the community, and for road safety. The Council and WYCA should have been open in the CIP consultations that this was one of the negative consequences consultees needed to be aware of, but that didn't happen. It should be noted however that Calderdale Council has only been able to carry out localised junction and network modelling for this scheme due to the lack of availability of a wider Strategic Traffic Model. This argument - that Calderdale's existing strategic transport model is not as good as the forthcoming strategic traffic model - has been used repeatedly and it will not do. (By the way, the new model was meant to be available in October, and it's now February). If the existing model has been used to calculate all the traffic volume changes to be fed into the CIP business case - so it's good enough for that - then you must also accept the model's use to assess the scheme's negative impacts. This localised modelling looks purely at network capacity and does not take into account the impact of efforts to generate a modal shift towards sustainable travel such as improvements to the cycling provisions, improvements to the pedestrian route to Hebden Bridge Railway Station and increased bus reliability due to removal of pinch-points. **There's a simple answer to this: if the council is claiming that the CIP will generate positive modal shift towards sustainable travel - which personally I think unlikely, but I'll await the evidence - why don't you now demonstrate this by using the new strategic traffic model, which can also be interacted with an air pollution model, to demonstrate what the net impact of the CIP on air quality and modal shift in Hebden Bridge will be?****

As you know the Combined Authority is now conducting its review of all road capacity schemes (including the West Yorkshire CIPs) to establish whether they can be compatible with the radical reductions in carbon emissions that their own climate emergency strategy requires, including reductions in private car use of between 21-38% by 2038. (By the way, is that 'WYCA CIPs = increased road traffic; WYCA Climate Emergency = reduced road traffic' another unresolved policy contradiction?) So why doesn't the Council pause all the Calderdale CIPs until it can demonstrate to the

satisfaction of everybody that the A646 CIP will have a positive net effect on carbon, on air pollution and on modal shift? As you know, the council has no evidence to demonstrate positive net effects for any of these. Neither does this modelling distinguish between electric and petrol or diesel vehicles. **I hope you're not alluding to the typical DfT argument that the problems created by ICE vehicles will all be solved by the shift to EVs by 2050. That shift will begin to be significant from the late 2020s onwards, but the real question is: what's going to happen immediately - in 2021, 2022 etc? This 'problem-solved in 10 or 30 years' argument can be deployed by policymakers to set aside the requirement to tackle the air pollution we're experiencing right now.**

In summary Calderdale Council feels that the interventions proposed by the A646 Corridor Scheme are consistent with its objectives for Growth, Connectivity and People and Environment as set out in its Transport Strategy. **Except that the council can't demonstrate that with evidence, and what evidence is available points to just the opposite.**

Anthony Rae

Calderdale Friends of the Earth - 3rd February 2021

c.c Cllr Courtney, chair of the Calder Ward Forum; Calderdale councillors; Hebden Royd town councillors

appendix - FOE original question

The Hebden Bridge air quality management area was declared in 2006 because air pollution particularly on Market Street exceeded the legal limit of 40µg/m³ NO₂. In 2006 it was 48 µg/m³ and in 2020 it was still 46µg/m³ (2020 air quality annual status report, page 12). I'm not aware of any actions in recent years taken by Calderdale Council - regardless of whether they have an 'air quality strategy' or not - to reduce air pollution to below the lawful 40µg/m³ level and now, instead, they've decided to make the problem worse by giving themselves planning permission to introduce a large traffic-generating use (a 62 space shortstay car park on the site of the former Vale Centre, Stubbing Holme Road) with impacts actually inside the AQMA. The problems that this would generate for air pollution were pointed out to the Council and yet in the submitted planning application, and the planning officer's report assessing it, they chose to deal with the issue by ignoring it. In fact the Council's own evidence is that the Corridor Improvement Programme, of which this car park is a component, will increase road traffic on Market Street, and it must be probable that congestion will occur at the unsuitable Stubbing Holme Road/A646 junction.

My question is: how is it acceptable that Calderdale Council should fail to take action for 14 years on an environmental and health problem that is known to have serious consequences for life; has now decided to make that problem **worse!**; and provided no explanation or justification for its actions?