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Westwood Heath Residents Association (WHRA)

Response to A46 Strategic Link Road Consultation

9th February 2021

1 Introduction

Thank you for the opportunity to comment on the proposed “A46 Strategic Link Road” consultation. May we also take the opportunity to thank the team for responding to questions from members of our community.

2 Executive Summary

We do not support the creation of the Link Road in its current form, as described in the online information provided on the A46 Strategic Link Road website.

The main reasons for this are:

1. Destruction of Green Belt
2. The Link Road is no longer a Link Road
3. The modelling does not take account of post-Covid-19 ways of working
4. The foundation of the business case contains unsound data
5. The conduct of the consultation was flawed
6. The answer is a road, what’s the question? The active travel options were tagged on, not designed as alternatives

We believe that the underlying need should be reassessed in 12-24 months when working patterns have stabilised and all stakeholders have determined their future strategies.

In the interim, we further advocate that a study based solely on sustainable travel options be undertaken to fully explore the opportunities these present, exploiting the window of opportunity presented by the pandemic. This in our view would be a productive use of time instead of a blunt “Do Nothing”.

3 Destruction of Green Belt

3.1 National Planning Policy Framework

The Consultation documents do not make any mention that the vast bulk of the Link Road route passes through Green Belt.

We believe that this should have been brought to the attention of those invited to look at the proposals.

**Once the Green Belt has been destroyed it does not come back.
It is lost forever.**

The National Planning Policy Framework (NPPF) sets out the purposes of the Green Belt in para 134:

(Para 134.) Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

The NPPF goes on to state:

143. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

146. Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. (our emphasis).

These are:

c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;

In its current form, the Link Road removes the last sliver of Green Belt between Kenilworth and Coventry at the point where it crosses the Kenilworth Road/Coventry Road.

It further encloses an area to the east of Link Road thus destroying its openness, in conflict with para 146 of the NPPF.

3.2 The Warwick District Local Plan

The Warwick District Council (WDC) Local Plan does not define the location or route of a Link Road in detail (with the possible exception of SCG13 – see later).

Reference: 2.80 (p34) (Reference to safeguarded area DS21 in Westwood Heath)

*The area is adjacent to the proposed route of HS2 and will also be subject to the provision of additional major infrastructure development in the form of the implementation of the A46 Link Road, which will initially see a major upgrade to the A46 / Stoneleigh Road junction. Subsequent phases are to follow and will provide additional capacity on the local network. **Further details of the proposed road will be captured as appropriate in the plan review for this part of the district.** (our emphasis)*

As far as we are aware, no such plan review has taken place yet.

4 The Link Road is no longer a Link Road

The basis of the Link Road has been set out at various stages:

- A 2015 paper (released under FOI in 2018) which sets out a three phase programme with the third phase being a connection to the A45 or A452.
 - This stated that “[The business case \(would be\) challenging without the context of Phase 3](#)”
 - This also cited expansion of Westwood Business Park as part of the case.
- June 2018 CCC/WCC Team Presentation to WHRA
 - Detailed the prospective “Three Phase” approach as above. At the time we stated that we believed that Phase 2 was not viable without Phase 3.

In the Warwick County Council Cabinet meeting of 12th September 2019, a proposal was accepted to begin the work of which this consultation forms a part.

At that stage, the road, formerly known as “A46 Link Road Stage 2”, was renamed to “A46 Strategic Link Road” and the scope of further work excluded Phase 3.

This is ironic as by solely focussing on the former “Phase 2” option, the project lost its strategic intent of connecting the A45 and A46 without passing through residential areas. We have been told that Phase 3 is not under consideration at this time and will only be assessed ‘if it is necessary’.

Through a letter to Zarah Sultana MP, Highways England have confirmed to us that “[The proposals will form part of the local road network, and not the strategic road network \(SRN\) which we manage](#)”.

The significance of this is that while “a” Link Road was tacitly included or mentioned in the WDC Local Plan, its form has completely changed from what was originally conceived, although by retaining the attribute “Link Road” the proposal seeks to create a tenuous relationship to the former three stage project.

Further, the use of the term “Strategic” to try and enhance the status of the project creates a misleading impression.

5 Timing of the consultation – Post-Covid-19

5.1 Impact of the Covid-19 pandemic

The Department for Transport (DfT) set out a requirement in the document “The Transport Business Cases” that *“Each business case builds upon the last: evidence is reviewed to ensure that it remains up to date, accurate and relevant.” (our emphasis)*

Since the Detailed Modelling Assessment was constructed, transport and the economy has seen an unprecedented disruption due to the Covid-19 pandemic. The traffic model used in the Modelling Assessment (M.A) was audited in February 2020 (prior to the pandemic taking effect) and although the M.A. was released in April 2020 it takes no account of long-term pandemic effects.

Post-pandemic work practices may make a step change in traffic patterns, some of which are showing already:

- Home-working, hybrid home/office working and staggering of commuting times are likely to have a one-off step change.

There is no attempt to quantify this within the consultation documents. Indeed, in response to questions on this, proceeding without this analysis was justified on the basis of *“tight timescales with respect to funding”* and that it would be assessed at a later stage.

This is absolutely fundamental to the business case and justification to proceed to any further work. The model on which the study was based may be the most recent model, but it is no longer up-to-date and relevant.

We do not currently see the pre-Covid-19 queues on Westwood Heath Road or Gibbet Hill Road despite “the overall local traffic network being at 90% of pre-Covid-19 capacity” (John Seddon, Coventry City Council (CCC)).

- Warwick University stated to us in (Dec 2020): *“Covid has affected many of the University’s future plans with reviews scheduled for the coming months”*. The University has since announced plans to limit the number of people on campus and launch new agile working guidelines – i.e. exactly the sort of outcome we would expect from other employers who are able to operate at least part of their business in this way.
https://warwick.ac.uk/services/estates/developments/our_future_campus/transport_and_mobility/

This has not been quantified or taken into account in the Modelling Assessment. Indeed, in the Modelling Assessment, a future growth of 20% in traffic numbers for the University has been used.

The Modelling Assessment is therefore not *“Up-to-date, accurate, relevant”*.

5.2 Uncertainty in population projections

In December 2020 the UK Statistics Authority began a *review of methods and data that underpin the population projections* due to “perceived inaccuracies of the population estimates on which the household projections and subsequent housing need are based”. This could have material impact on both CCC and WDC Local Plans and any substantive decisions based on those plans should be held over until the review is complete.

This was answered in Web broadcast 2 (at 34:00) as “the statistics have been discredited by *some*”. The “some” included at least twelve Parish Councils / Residents Groups within Coventry and the environs, five cross-party MPs, councillors and the Mayor of the West Midlands. None of these parties undertake this exercise lightly.

We understand that this will be reviewed again after the UKSA investigation concludes, with a report now expected in March 2021, but we were surprised that there was no curiosity about such an issue.

We would welcome an opportunity to brief the A46 Strategic Link Road team on the evidence.

5.3 Solihull Borough Council Local Plan

We have just become aware of the draft Solihull BC Local Plan, published in December 2020.

Within this plan there is a planned large extension of housing to the South East of Balsall Common, in close proximity to Burton Green. There is also a proposed relief road around Balsall Common. Together these could feed traffic towards Burton Green and Westwood Heath.

The plan also cites a *“challenge of a lack of direct public transport link to University of Warwick.”*

As far as we can establish, this has not been taken into account in the Modelling Assessment.

It is significant because of the ‘right turn’ effect this could have on the Cromwell Lane / Westwood Heath Road junction which is already highlighted as an issue in the A46 Strategic Link Road Modelling Assessment.

6 Basis of the Business Case

There are several sources for details relating to the business case for the Link Road:

- The 2015 scheme released under FOI (cited above)
- The 2019 Warwick County Council (WCC) Cabinet Paper
- The Consultation Documents

On the basis that the business case needs to be “Up-to-date, accurate, relevant”, we highlight the following issues that have changed or are not met:

- Westwood Business Park is shrinking, not growing
 - Two large employment sites have been replaced by student accommodation blocks (approx. 1,100 rooms).
One of the conditions of tenancy is that students do not bring cars to the accommodation and on the whole this seems to be adhered to. The blocks are within easy walking or cycling distance of the University.
 - One large employment block has been vacated and used as a research centre for the University of Warwick
 - There has been significant reduction in employment at Eon because of consolidation after merger activity.
 - By daily observation, queuing in and out of the business park was significantly reduced by YE 2019 compared to the previous twelve months, i.e. Pre-Covid-19
- The NAIC has a lower occupancy than forecast (Source: UoW meeting March 2020)
- As mentioned elsewhere, The WCC document from 2015 and released under FOI in 2018 specifically stated that the “business case (would be) challenging without the context of Phase 3” (the formerly planned link to the A45 or A452)
- The WCC Cabinet paper includes Cromwell Lane as a road where “rat-running” should be reduced – but a written answer to a consultation question and the Modelling Analysis itself states that traffic on Cromwell Lane and Westwood Heath Road will increase.
 - Indeed, other roads in the area also see increases in traffic, as shown in the Modelling Analysis.
 - In the 2018 WHRA meeting we expressed the concern that Westwood Heath Road was itself a “rat run” with excessive speeds and heavy commuter traffic. The Modelling Assessment actually coins the term “rat running on Westwood Heath Road” and also states that traffic volume will increase “significantly”. Therefore this objective is not met.

6.1 University of Warwick Aspiration Growth

There are many references to the “aspirational growth” of the University of Warwick.

The WDC Local Plan (MS1) states:

MS1 University of Warwick

Development at the University of Warwick will be permitted in line with an approved Masterplan or Development Brief as agreed with the relevant local planning authorities.

The Masterplan should set out how proposals will contribute to the University delivering a world-class educational campus including the range of uses associated with that. It will provide the framework within which further planning applications will be determined.

As such the Masterplan should:

- a. identify the physical and economic context;*
- b. identify the development principles to underpin future development proposals;*
- c. identify the location of developments, demonstrating how proposals will mitigate any potential adverse impacts; and*
- d. identify how the proposals support the vitality of the local and /or sub-regional economy*

The original University of Warwick Masterplan ran from 2009-2019 and it was expected that a further iteration of the Masterplan would emerge before the end of 2019.

In 2018, the University of Warwick submitted a “Hybrid Plan” seeking permission on nine capital projects (two full and seven outline permission), justified mainly on the replacement of existing buildings and upgrading of facilities. All of these projects were located within the Coventry City Council boundary. There was also an increase in the cap on parking spaces by 1030 to 6452 (a 19% increase), justified not on growth but on removing the parking nuisance from residential streets.

Since the Hybrid Plan has been granted outline planning permission, then we contend it cannot be described as ‘aspirational’.

The WDC Local Plan calls for development of the University to be supported by a Masterplan (which, by its nature, would have undergone public consultation)

We believe it is reasonable that the “A46 Strategic Link Road” proposal should be informed by the Masterplan beforehand to demonstrate the need for growth. The Modelling Analysis assumes a 20% increase with no real justification or reference.

In the “Capital Plan Hybrid Application Transport Assessment and Travel Plan” submitted with the Hybrid Plan Application in 2018, there are extensive references to

the Link Road. However, throughout the document the assessments made were on the assumption that all three of the initial phases would go ahead: *“The University will continue to support the development and promotion of the A46 Link Road scheme including Phases I, II and III.”*

In a written response to a question, we were told by the A46 Strategic Link Road team that (in relation to Phase 3): *“This larger project is not being developed as it is not currently part of the Solihull Local Plan and therefore has no remit for further investigation”.*

Therefore, the assumptions within the University Hybrid Plan Transport Assessment are not valid and this would need to be revisited. We believe this will show that the impact on the local community will be severe.

7 Conduct of the consultation

A consultation process should be meaningful, transparent, unbiased and not prejudicial to the outcome.

We feel that the consultation falls short of these objectives in many areas.

7.1 The options are really phases or subsets of one option

In the DfT document “The Transport Business Cases”, emphasis is placed on comparing *“outline options, including innovative options, to tackle the problem and carry out initial sift of options”.*

In our view the proposals show one basic option that is split into different sections or phases, rather than different options that are compared with each other to compare costs and benefits.

7.2 Initial notification

We were pleased to have the opportunity to have an initial MSTeams meeting with the A46 Link Road Team at the beginning of the consultation.

At this meeting it transpired that we should have received a leaflet drop already but this had not happened, and after further investigation we could not find anyone within Coventry who had.

We are grateful for the consultation phase being extended to February 14th 2021 as a result, as giving any meaningful response over a shorter period over Christmas would have been well-nigh impossible.

However, leaflets were not received in Westwood Heath until the day after the first Web broadcast, so a potential audience was lost. At that stage we asked if an additional broadcast meeting could be run in January; we received a limited

response to this request in that we were informed that one more broadcast was already scheduled.

To this day (early February) we are still coming across people who either did not receive the leaflet or possibly did not realise they did as it was only A5 and easily lost in other post over the busy Christmas period.

We have however tried to publicise the consultation as much as possible using our social media and email distribution lists.

7.3 Initial leaflet information

The initial leaflet itself was not attention grabbing in our opinion. In particular as it was intended to highlight the proposed Link Road, the Link Road was missing from the map!

Curiously, the Coventry South station and interchange was included, despite being in the very early stages of planning!

7.4 Consultation documents not suitable for online use

The consultation documents appear to have been designed to be read in hardcopy form – the tables with small vertical text were particularly difficult to read on a screen (and actually quite hard to read in hardcopy). Many people with home printers would be unlikely to print such a colour-rich document at home and although the option was available to obtain the documents through the post, we feel that many people would have been put off reading them at an early stage.

7.5 Bias and lack of transparency in the Consultation documents

There was a heavy bias towards “Option Three” using a very primitive Red/Amber/Green colour coding. This colour coding is a basic psychological methodology designed to produce or influence the response desired by the document authors.

Three items we single out as showing bias were:

- Air Quality
 - Coded Green in Option 3, although we had been told that analysis of Air Quality was excluded from this consultation phase and due to be considered later in the process.
 - This was explained to us to be a judgement based on traffic moving faster – though that does not take account of increased volumes and the other complex issues that have to be considered in measuring Air Quality. We do not see how this “Fully meets” the objective, as indicated in the consultation document.

- Reducing rat-running
 - In an earlier section we noted that rat-running actually increased significantly on some roads, and in particular on some of the roads that were highlighted to have reduced rat-running, so the “Fully meets objective” score cannot be correct.

- Reduce severance
 - This was explained to us as:

One of the objectives is to 'Reduce Severance', this is in relation to supporting people in the local area who currently have poor/limited access to the wider transport network. This could be due to traffic congestion (particular at peak times), a lack of direct access, or increased travel distance, to the existing transport network (road, public transport and active modes) from current communities and future developments. The three options vary in degree as to how they achieve this objective, with the options providing differing levels of improved connectivity to a range of areas/people.
 - The DfT definition of severance in TAG UNIT A4.1 Social Impact Appraisal includes:

Severance primarily concerns those using non-motorised modes, particularly pedestrians. To ensure a consistent approach, classification should be based on pedestrians only. The impact of severance on cyclists will differ for two reasons: they travel more quickly; and crossing facilities may not be available to them.

The DfT definition is primarily concerned with pedestrians whereas the Link Road cites traffic congestion.

As an aside the Link Road will cut through cycle way Sustrans 52, thus causing severance of a sustainable travel route.

- There is a lack of transparency of the “close Gibbet Hill Road” sub-option which was tucked away in the text and not obvious. This particular sub-option has the potential to cause even greater distress to Westwood Heath Road. A similar comment applies to closing Stoneleigh Road to through traffic.
 - This option would potentially cause other rat-running options to open up, such as the route through Cannon Hill Road for Cryfield Heights and Gibbet Hill Road traffic.

- The proposal for a dual carriageway is also hidden away in the text - not at all obvious – and the map makes no distinction between single and dual carriageways.

7.6 Shifting of traffic from the Strategic Road Network to the local road network

The justification is not very transparent about the Link Road being in part to relieve traffic off the A45 – moving trunk road traffic onto the local road network.

The clue to this is that six junction improvements are proposed to help the flow across the west and northwest of the city through residential areas. In total, across the A.M. and P.M. peak period the Modelling Assessment is forecasting an increase of ~1,100 vehicle movements through these residential areas.

Many of the roads to where traffic is to be moved to are not suitable for volume increases, nor increased HGV traffic, for example:

- Westwood Heath Road – over sixty driveways, ten side roads and ten commercial/community premises over a short distance
 - Will increase if/when the Crest Nicholson development is built, and potentially further significant changes if the safeguarded area S1 is developed in the future
 - Pedestrian crossings will be needed to access the proposed cycle ways and paths
- Cromwell Lane – similar concentration of driveways and entrances; narrow bridge on the south side
- Banner Lane and Broad Lane were already very busy pre-Covid-19
- Many other local roads are similar
- The Traffic Assessment for the additional 240 houses along Cromwell Lane (Paragraph 6-4-10 OUT-2016-1874) highlights the junction between Cromwell Lane and Charter Avenue as ‘operating at or near capacity’ at peak times in 2021, though this finding does not appear to be included in the A46 Link Road Modelling Assessment.

If the long term plan for Westwood Heath comes to fruition, there will be housing almost the entire length of Westwood Heath Road and a considerably poorer Air Quality in a residential area – exactly the problem that the scheme is intended to avoid!

7.7 Air Quality

WDC have declared a ‘climate emergency’ with a plan to be Carbon Neutral across Warwick District by 2030 and the scheme does not support this aim.

https://www.warwickdc.gov.uk/news/article/297/warwick_district_council_declares_a_climate_emergency

The whole of Coventry is an Air Quality Management Area.

The A46 Strategic Link Road will only increase traffic and is in the opposite direction to the trend to improve air quality, with no proposals for mitigation other than the vague wording of ‘active travel’ and ‘sustainability’ aims.

7.8 Active Travel

The proposal seeks to justify the positive impact on active travel by designing a cycle path and footpath alongside what will be a busy road, primarily dual carriageway.

However, there is no attempt to examine or propose wholly active travel concepts as an *alternative* to the Link Road.

In simple terms, if you build a road, it takes away some of the incentive to seek alternative modes of travel.

We believe that with a clean sheet of paper and a £70M budget, some more creative ideas could have been forthcoming!

For instance, there is sufficient space between highway hedgerows in both Stoneleigh and Gibbet Hill Roads to considerably widening both and thus improve traffic flow. In the case of the former, this would include a footpath on at least one side and the widening of the rail bridge is a small project in civil engineering terms.

8 Assessment of other options

8.1 Closure of Gibbet Hill Road

Whilst we understand that the University of Warwick would benefit greatly from this option, it is very much at the expense of the local community.

As the proposed routing of the Link Road through the middle of Westwood Heath stands, closure of Gibbet Hill Road would route significant volumes of traffic on the lower end of Westwood Heath Road, including the potential of overnight HGVs routing from Tile Hill industrial and distribution areas.

The Modelling Assessment does not cover the flows of night-time traffic, nor specifically the HGV mix.

Looking at the potential future of Westwood Heath, if the safeguarded land at S1 comes into use for housing, there will be an enclosed route with housing on both sides with the attendant impact of noise, vibration, and air quality issues.

8.2 Potential to route via Kirby Corner roundabout

In the WDC Local Plan, there was a proposed amendment by Turley on behalf of the University which named Kirby Corner as the potential joining point for the Link Road. This did not appear to make it to the final version of the Local Plan.

There may be a possibility of the Link Road routing around the western perimeter of the University along the route of an existing bridle path and joining at the Kirby Corner island. This would give direct access to the University, Westwood Business Park and a route through to the A45 at Fletchamstead Highway.

There is also a reference in the WDC Local Plan “Statement of Common Ground SCG13” that the Link Road would connect at Kirby Corner in addition to the previous reference to the Hybrid Plan Transport Assessment.

We have not analysed this in detail to judge the feasibility, but many residents were surprised that this routing was not considered in the proposals as it may be the “least worst” option for Westwood Heath, though it would still have a grave impact on the Green Belt and other residential areas such as Cryfield Grange Road – and would not solve the rat-running or congestion pinch points on Cromwell Lane.

Of course, this does not contradict our opening statement about having a long hard look at Post-Covid-19 travel impacts first.

It would appear that, along with the importance of Phase 3 to making the link road concept viable, the link to Kirby Corner has also been lost along the way.

8.3 Option to route into Westwood Business Park from Westwood Heath Road.

It is not clear what is proposed here; there is already a link into the business park to the Eon building. This passes through a residential area and we would not support this turning into a through route.

There is an emergency access road that passes from Westwood Heath Road into the business park, but this is very narrow with houses close on either side so that does not look viable either.

9 Furthering the cause of sustainability

In the opening paragraphs we indicated that instead of a “Do Nothing” option, there could be a “Analyse the sustainable possibilities” option. Indeed, the University of Warwick are passionate about sustainability in their drive to be carbon neutral by 2050, and a recent worldwide webinar was chaired by the Vice Chancellor precisely to further this agenda.

There are paths and cycleways in the locality which could be enhanced, road crossings and footpaths improved without the need for a major road construction.

Coupled with the potential future benefits of VLR, the potential new rail station and the community-wide change in working practices, there is a once in a generation opportunity to create a vision for sustainability that truly involves the local community.

We suggest it is time to pause, step back and reflect on how improvements could be made without the underlying assumption that a new road is the answer.

We believe that such a study could be jointly run by Council, Stakeholder and Community groups and has the potential for much greater “buy-in” than being presented with a menu of unpalatable options.