

## A259 CORRIDOR IMPROVEMENTS TRANSPORT BUSINESS CASE

Sustrans made a submission to West Sussex County Council in May 2013 highlighting the opportunity to invest in sustainable transport when addressing capacity issues on the A259. However, the business case focuses a ‘road solution’ rather than a ‘transport solution’ with no ambition for modal shift. The business case is based on improvements to journeys by motorised traffic. By further entrenching private car use as the mode of choice, the business case has a very narrow focus which:

- Fails to take into account the economic costs of increased congestion in Worthing;
- Fails to take into account the wider context of carbon emissions from transport and the costs of failing to address the causes of climate change;
- Fails to take into account the costs of worsening air quality, in particular in and around the Air Quality Management Area (AQMA) in Worthing;
- Fails to realise any monetised benefits by providing high quality cycling infrastructure.

Sustrans argues that this area of coastal West Sussex needs a joined-up transport strategy that, in the words of the Sustainability Appraisal for the West Sussex Local Transport Plan, recognises that:

**“Transport measures such as modal shift to less polluting forms of transport and reducing the need to travel... contribute to achieving higher standards of air quality. The synergies and links between air quality management, climate change and human health should also be recognised.”**

### REDUCING TRAFFIC LEVELS: MODAL SHIFT

The Sustainability Appraisal for the West Sussex Local Transport Plan states:

**“...there is the risk that the economic growth strategy will increase traffic levels - this will need to be mitigated by changes in travel behaviour...”** (Page 5)

A wide range of monetised benefits – economic, environmental, health and social – should accrue to the community from a modal shift away from private motor vehicles. However, the business case presents no measures that would reduce traffic levels. Indeed, Sustrans has been told that no work has been done to model the impact of these proposals on the modal share of journeys.

The potential effect of increased traffic levels on the A259 feeding into Worthing is evident from the West Sussex Local Transport Plan:

**“Road congestion during peak periods affects many parts of the highway network throughout the Borough, disrupting journey times and causing poor air quality. Due to the geography and density of the developed area, physical improvements to the highway network, which require space outside the existing highway boundary, are challenging to deliver.”**(WS LTP3 Pages 66-67)

The Business Case presents no evidence that the impact of increased traffic levels feeding into Worthing from the A259 has been assessed. There are potentially significant economic costs associated with greater levels of congestion within Worthing, as well as the consequent increase in carbon footprint and worsening of air quality. These costs are not reflected in the business case.

The logic of the Local Transport Plan is that Worthing needs coherent transport planning to reduce traffic levels. The proposals in the business case stand in stark contrast to the approach taken to address similar problems on the A270 Lewes Road out of Brighton, where bus trips are reported to have increased by 7% and cycling trips by 14%.

## CLIMATE CHANGE

The forum of the West Sussex Environment & Climate Change Board in March 2013 highlighted a key concern with sustainable transport schemes. This business case demonstrates the need for continuing concern. A major investment in transport; it fails to establish a credible contribution to targets to reduce carbon emissions from transport by 50% by 2025. The Sustainability Appraisal for the West Sussex Local Transport Plan 3 (February 2011) records:

**“[The] Risk of impact on climate change as a result of economic growth strategies.”** (Page 3)

**“New infrastructure and development plans could increase emissions unless designed carefully. Mitigation includes promoting and encouraging more sustainable travel choices, cleaner vehicles and reducing reliance on private cars.”** (Page 5)

The business case claims a reduction in greenhouse gas emissions, but the methodology is not explained. The assumption is that the measurement has been narrowed to such an extent that it reflects only a reduction in congestion on the stretch of the A259 under consideration. As has been argued above, the impact of increased traffic levels on the A259 will be felt over a much wider area and that should be reflected in the business case.

At best, the overall effect of the proposals will be to further entrench the existing modal share of journeys with minimal effect on the total carbon footprint for road transport. At worst, the business case presents a range of benefits for road journeys that will make the least sustainable mode of transport more attractive. In either case, this makes targets to reduce carbon emissions more difficult, and more expensive, to achieve.

Moreover, if the claimed reduction in greenhouse gasses results from comparison to the effect of a “do nothing” option, then the claimed reduction is relative only to the worst possible scenario. Comparison to the costs and benefits of a range of measures designed to reduce traffic levels would show a very different picture.

## AIR QUALITY

The Sustainability Appraisal for the Local Transport Plan highlights the need to address air pollution.

**“There are a number of air pollution hot spots or AQMAs across the County. New infrastructure and development plans could increase emissions unless designed carefully.”** (Page 5)

The Business Case does not present any mitigation that would improve air quality. Nor does it reflect the continuing costs of failing to address poor air quality: the health costs and fines for failing to meet air quality standards. Indeed, Appendix A contains the alarming statement:

**“Increased emissions of nitrogen dioxide and particulate matter from changes in traffic flow may occur as a consequence of the improvements.”**

There is no coherent analysis of the impact on air quality, in particular the consequences of increased traffic flows into the Worthing AQMA. It appears that consideration has focussed only “along the route of the proposed scheme as a result of the scheme alone.” At a time when central government is cutting the funding available to local councils to address air pollution, it is critical that, in the words of the LTP Sustainability Appraisal:

**“Transport measures such as modal shift to less polluting forms of transport and reducing the need to travel... contribute to achieving higher standards of air quality.”**

## CYCLING

The infographic illustrates the wide range of monetised benefits that follow from investing in cycling. The Transport Business Case is notable for failing to monetise any benefits from cycling. This is not an oversight, but a failure to plan and design cycling infrastructure of high enough quality to achieve a modal shift and improve safety.

Sustrans will respond to West Sussex County Council's public consultation to argue in detail that the provision for cycling has not been conceived as being part of the solution. The cycling infrastructure along the A259 will remain piecemeal and of insufficient quality either (a) to achieve a modal shift away from car journeys or (b) to make an impact on the alarming increase in the number of cyclists killed and seriously injured on the roads in West Sussex.

Two examples illustrate the point:

- The plans would provide cycle paths along the A259 between Ferring and Rustington. However, in the space of just over 2 miles cyclists would encounter 22 separate places where vehicles would have priority.
- In May 2013 Sustrans highlighted to WSCC the need for high quality cycling provision at Goring Crossways roundabout to link up existing cycling infrastructure. The plans accompanying the Business Case provide no cycling infrastructure at all. Indeed, some existing cycling infrastructure appears to have been omitted from the design. Goring Crossways will remain a significant barrier to cycling.

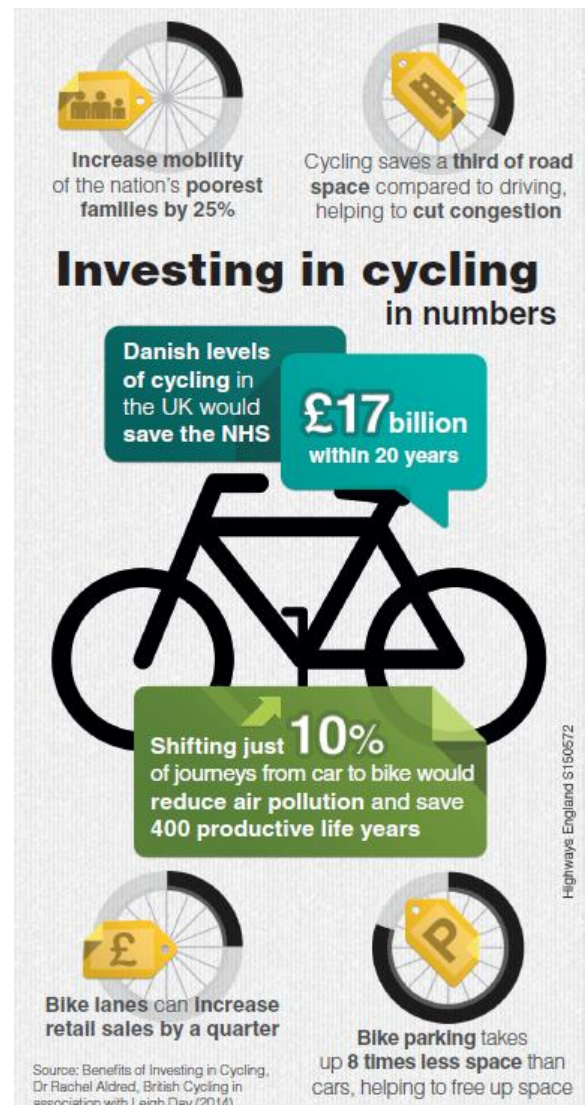
The proposals represent a significant missed opportunity to invest in sustainable transport, to encourage modal shift, and to improve cycling safety. A high-quality cycle route along the A259 connecting Littlehampton to Worthing would be the spine without which connections to existing communities and to new developments will be ineffective.

Sustrans argues that the proposals in the business case are not in line with the National Planning Policy Framework:

**“The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.”**

**“Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people.... [should] give priority to pedestrian and cycle movements... create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians...”**

**“Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives.”**



HIGHWAYS ENGLAND (2016) Cycling Strategy