



alliance against road building

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Dear Mr Collins

Re: Guidance to Local Authorities seeking DfT funding for transport Major Schemes – consultation response

Road Block would like to take the opportunity to respond to the above guidance, issued in April 2005 at http://www.dft.gov.uk/stellent/groups/dft_localtrans/documents/page/dft_localtrans_037039.hcsp

Overall, Road Block would like to congratulate the Department on this new guidance. There is a recognition of the risks of cost escalation, and the new steps to tackle this, outlined in the guidance, are to be welcomed. We particularly welcome the strengthening of section 1.5, *Development of options*, and the Annex B guidance which clarifies appraisal requirements between the approval stages.

We do, however, have a few comments on the new guidance, and outline them below. We have taken each concern in turn, as they appear in the guidance, and have included paragraph numbers.

1.5 - Although the guidance on option identification has greatly improved, Road Block would like the guidance to be clearer, and less ambiguous to prevent local authorities from repeating mistakes from the LTP1 period. Although the guidance could not be clearer about the *importance* of the examination of alternatives to road building, there is still a lack of clarity of the exact requirements, and the detail and level of appraisal needed. This is also no formal role for stakeholders to contribute to this process, leaving the option identification stage a 'closed' process.

1.5.3 - The guidance says that *'a detailed assessment of the scheme against the alternative options'* is needed. However it does not outline the level of detail required. We would like this clarified.

1.5.4 - In particular we are concerned about the wording here: *'We would expect authorities promoting highway schemes to consider at least one public transport alternative and to undertake an appropriate level of analysis on it'*. It is not made clear what would be an 'appropriate level', and we would recommend that it is essential that this is tightened up. Also, we are concerned that this requirement goes against the GOMMMS recommendation that local authorities should examine combinations of options, or 'packages' of 'soft measures' with infrastructure etc, to use the synergies of different approaches. We are concerned that local authorities will put forward unfeasible stand-alone public transport schemes, that they know won't be able to compete with the road scheme, simply to make the road 'look better', without it being a serious attempt to put forward a realistic option.

2.1.2 - We welcome the requirement of a Major Scheme Business Case, and the five key aspects, to attempt to force local authorities to put in realistic bids which demonstrate their ability to deliver.

3.3.1 - We are concerned at the vagueness of the wording here. There is no definition of what a *'lower cost alternative'* should be, and it does not make reference to the options outlined at 1.5.4 - *'public transport provision, demand management policies, traffic management measures and strategies'*. We would like to see *'a full appraisal of a 'next best' option'* for all Major Schemes, not just for those above £20 million. We would certainly like to see the word *'may'* removed.

4.2.17 - We are pleased that local authorities are required to produce a list of stakeholders, and produce a 'communications plan' (4.2.18). However, we are concerned that there are no formal procedures set out by the guidance on how to involve stakeholders, especially at the crucial option identification stage. Also, stakeholders will have to rely on the local authority to represent their views fairly to the Department. Although the Department seeks the views of various non-governmental organisations at the Programme Entry stage, there is no requirement to do so, and there are no formal protocols on how this should be done, and how their views will be considered.

4.3 - We welcome independent Gateway Reviews.

4.4.1 - Quarterly Reports do not seem to be produced, and are certainly not supplied to local campaigners when requested.

5.1 - We welcome the addition of a Conditional Stage in the approval process, as a recognition that costs are often underestimated by local authorities.

5.1.4 - We welcome the name change from 'Provisional Approval' to Programme Entry, removing the word 'approval', however we still have concerns about this stage, as below at 5.2.8.

5.1.5 - We are concerned, however, that the timetable for MSBC submissions will not follow the APR timetable, as previously, and that bids can be submitted at any time. This will make it much more difficult for non-governmental organisations, statutory bodies, and local residents to be able to plan detailed responses. If the APR / settlement timetable were followed, stakeholders can plan their workloads to be able to provide the best possible response. If bids and decisions are to come randomly, there is no guarantee that stakeholders can halt workloads, and respond in the detail necessary.

5.2.8-9 - Previously, it has been unclear exactly what Provisional Approval meant, and experience showed that public inquiry Inspectors had been inclined to accept that this meant that the government had already approved the scheme, and there was no reason to examine alternative options put forward by Objectors. We are glad that 'approval' has been taken out of the name, although notice that *'the definition remains essentially the same'* (5.1.4). We would like to see the guidance make it explicit that Programme Entry does not constitute approval, and that the scheme is not already decided. Otherwise the perception will be that any other opportunity to examine the scheme - public inquiry - will be a sham.

5.2.10 - We are pleased that schemes that have not moved to the next approval stage within four years *'will exit the Programme'*. We expect to see this guidance vigorously applied to schemes that have not progressed for years, such as the Brunel Link - Harnham Relief Road in Wiltshire. We would like the exemption for 'exceptional cases' to be removed, and this policy applied to all outdated road schemes.

5.3.5 - We also welcome the requirement for further updated appraisal at the Conditional Approval stage. However, we are disappointed that the requirement to reappraise applies only to the preferred option. As the period between Programme Entry and Conditional Approval has previously been in excess of four years (such as the Linslade Bypass), we believe it is essential that there should be some analysis that the preferred option remains the best transport solution for the area. Much can change within this time period, and it is essential to re-examine whether the preferred option remains the best transport solution, to the standard of best current practice, and current transport policy. Reappraisal must include the impact of induced traffic, as per comment below.

Annex B - Road Block is delighted that finally there is guidance for schemes that are moving from Programme Entry to Conditional / Full Approval. We hope we never see a situation similar to the farce surrounding the Linslade Bypass, where outdated appraisal guidance was used, alternatives were never examined and the scheme remained an anachronism, with no opportunity to challenge decisions.

Induced traffic - Neither WebTAG Unit 1.4, nor this draft guidance cover induced traffic in any detail, despite the requirement to do this being made very clear at WebTAG Unit 1.4, Figure 2. We would like to see a requirement for local authorities to assess the impact of induced traffic covered in detail in this guidance.

Yours sincerely

Rebecca Lush