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Dear Steve

New Major Schemes – comments from Road Block

Thank you for giving us the opportunity to comment on new Major Schemes that have come to the Department for approval. We are using the April 2005 *Guidance to Local Authorities Seeking DfT Funding for Local Transport Major Schemes*, the Full LTP guidance, and the relevant TAG Units to inform our response.

We have also taken the opportunity to comment on two schemes that have come to the Department for Conditional / Full Approval, or for additional funding, using the Major Schemes guidance, as described in Annex B and 5.3.4 to 5.3.8.

We would also like to draw your attention to schemes that have been provisionally approved for over four years and should therefore exit the programme (5.2.10 of guidance).

We would also like to comment on the procedures for road schemes, and the role of local communities in the process.

1. New Major Schemes

Road Block will restrict comments to **three** new major schemes where we have contact with local campaigners. This in no way indicates that we endorse the other schemes. Road Block does not support any road building that increases capacity, and encourages more road transport. We believe that the only Major Schemes that should receive approval and funding are those that do not increase road capacity and the need to travel, as per the full LTP guidance (2.41 - 43) and the Major Schemes guidance (1.5.1 - 4). This has not happened in the past, is wholly unacceptable, and we would like to see the guidance vigorously applied in the future.

1.1 Heysham to M6 Link, Lancaster

This scheme is opposed by many groups, including the Transport Solutions for Lancaster and Morecambe (TSLM) group. Their informed and detailed response to all aspects of the AST and the Major Scheme Business Case does not need adding to by Road Block, and I attach it in its entirety, as Appendix A.

In summary, the main comments on the Major Scheme Business Case are:

The primary objective is to improve communication with the Port of Heysham, when port HGV traffic is less than 3% of the overall traffic;

The secondary objective of removing traffic on local roads is not met, with traffic predicted to remain the same, or rise soon after construction;

The problems have not been identified correctly (TAG Unit 2.6);

MSBC does not conform to TAG in many instances, so meaningful assessment is difficult – particularly noise and pollution;

The major alternative and low cost options are not appraised fully, are not robust, therefore cannot be used for comparison, and have never been consulted on;

Support for road is exaggerated, and consultation is flawed;

Scheme will induce traffic, and is not consistent with national transport policy and targets, particularly reducing CO₂;

Regional Planning Guidance suggests making use of existing infrastructure;

Major intrusion on designated Green Belt land;

Impacts on habitats of protected species – five species of bat, Salmon, Crayfish, Otter;

Intrudes into area designated by Environment Agency as at risk of flooding;

Regeneration Area and Business Development Site not assisted;

No acknowledgment of conclusions of SACTRA 1999, and impact on local and regional economy;

Increases in workforce claims are unsubstantiated;

Road will not benefit those without a car, and so contradicts Regional Economic Strategy objectives on regeneration and social inclusion;

Severance of community from college sports field.

Road Block believes there seems to be a deliberate campaign by Lancaster County Council to 'smear' local objectors to the road, and exaggerate support for the scheme.

SUGGESTION: DfT reject the MSBC, and ask Lancaster County Council to re-examine the problems and appraise a non-roadbuilding solution that fits with national and regional policy, and is appraised to the standard of the latest guidance.

Contact: David Gate, Chair TSLM, 01524 63163 and david.gate@btopenworld.com

1.2 Brownhills Transport Package

The package comes in three parts: 2 roads, and pedestrianisation of Brownhills town centre. The northern bypass is of most concern within the package. Despite the road crossing entirely within Litchfield District Council and Staffordshire County Council, both authorities oppose the scheme, and have said that they will oppose any planning application from Walsall MBC. This makes it extremely unlikely the scheme will be able to complete the necessary statutory procedures. The proposed road would also cross entirely in Green Belt land. The scheme is vigorously opposed by people in Stonnall village, who have formed the Stonnall Campaign Against Roads (SCAR) campaign, and Brian Jenkins, MP. The pressure to 'release' the Green Belt for development will be increased if the road goes ahead.

Road Block and local people do not accept the conclusions of the AST, have doubts about its reliability, particularly the sub-objectives in the Environmental Objective. It is not believed that the problems or solutions have been identified correctly.

Problem Identification

The 'bypass' would have little impact on traffic in Brownhills, and it is suggested that the council attempts the proposed pedestrianisation of Brownhills first, in combination with public transport improvements, before any road building is attempted, as per 1.5.4 of the Major Schemes guidance. To address the minor congestion on the A461 and A452, a simple improvement of the existing infrastructure is needed – namely to improve the Shire Oak (A452/A461) and Muckley Corner (A461/A5) junctions, directing traffic around Brownhills, and up to the A5. This is proposed by Litchfield District Council, through which the road would run. Minor congestion caused by lorries at the Litchfield Road Industrial Estate will be alleviated when the canal scheme is completed. 'Rat running' is not a problem in Stonnall, and residents along roads that are supposed to be affected do not want a road. There have been no accidents on the A461 and Cartersfield Lane junction since the junction improvements.

Noise: The proposed route is in open land, and is within 150m of properties in Stonnall. As this is a new road, where there was none before, it is absolutely not accepted that there will be 'perceivable noise reductions' at Stonnall, and the 'moderately beneficial' assessment is also rejected. The AST assessment score does not show 'the net difference in the estimated population who are likely to be annoyed in the longer term as a result of the option compared to the do-minimum scenario in the fifteenth year' (TAG Unit 3.3.2, para 1.4.6).

Local Air Quality: It is absolutely not accepted that there will be 'significant air pollution reductions' in Stonnall, and the 'moderately beneficial' assessment is also strongly disputed when the new road would pass so closely to the village. The AST does not show winners and losers or show the change in exposure by pollutant (TAG Unit 3.3.3, para 1.4.9).

Greenhouse Gases: Similarly, the 'significant reduction' and 'moderately beneficial' assessment for Stonnall is entirely rejected, when this is a new road where there was none before. The AST does not include an overall assessment that shows the total change in emissions in tonnes of carbon dioxide as a result of the option (TAG Unit 3.3.5, para 1.2.3).

Landscape and Townscape: The road passes entirely through designated Green Belt land. The village of Stonnall, and surrounding hamlets, dates back to the 12th century, and the agricultural land is of Grade 2 quality. This is described in PPG7 as the 'best and most versatile land'; PPG1 (para 29) argues that 'considerable weight should be given to protecting such land against development'. Stonnall and surrounding areas are designated as Character Landscape in Area 67, Cannock Chase and Cannock Wood of the West Midlands RPG Map. It contravenes all aspects of Policy QE6 of West Midlands Regional Government Plan. Replacing mature trees and hedgerows with saplings is not sufficient. The impact on the village of Stonnall would be huge, and the 'slightly adverse' assessment is not accepted.

Heritage: Stonnall is a 12th century village, and many historic buildings will be within 150m of the road.

Biodiversity: Local residents say that there will be a huge loss of territory for wildlife, including red deer, skylarks, buzzards and badgers, and there will be significantly more than a 'slight risk of disruption / disturbance' to wildlife. There will also be damage to an integral part of the Cannock Chase Character areas.

Water: The 'neutral' assessment is rejected. The route falls in a catchment area for South Staffordshire Waterworks.

Physical fitness: Local residents do not accept that a new road with the increased traffic will result in more cycling.

Journey Ambience: The 'moderately beneficial' assessment is rejected by local residents of Stonnall, who will suffer the noise and pollution resulting from a new road. This assessment is seen from the motorist's perspective only.

Safety Objective: The proposed by-pass route will compound the difficulty of exiting and accessing Stonnall village from the A452. At present, opportunities are provided by the traffic lights at Shire Oak. Traffic traversing the proposed by-pass route would have no stoppage along the A452 and the junctions from Stonnall would be very dangerous. Since the junction of the A461 and Cartersfield Lane was improved, there have been no accidents. Junction improvements on the existing infrastructure will achieve better results at lower cost.

TEE: The 30% reduction in traffic in Brownhills is disputed. Traffic reduction in Brownhills could be achieved through other means, including the proposed pedestrianisation, reduced road freight due to the ongoing canal improvements and new marinas, sensible land use planning, 'soft measures', and public transport improvements, without resorting to destroying the countryside in a neighbouring district. Road Block believes that a new road could generate more traffic in the area.

Wider Economic Impacts: Local residents fully support the regeneration of Brownhills, but it is not accepted that a new road within a neighbouring authority's Green Belt will assist regeneration or promote economic viability.

Severance: The effect of the road on the accessibility of Green Belt land for residents will be dramatic, and the community of Stonnall will be cut off from the surrounding countryside on the western side of the village.

Land Use Policy: It is not agreed that the scheme strongly supports the national, regional and local land use policies stated, in fact it would be argued that the road would be against many of the policies listed. In particular this scheme is not included in the Litchfield Local Plan. It would be against PPS 1 (Sustainable Development), PPS 11 (RSS), PPG13 (Transport), and other government policies designed to reduce demand for travel, and encourage modal shift. The LTP is still only at a draft stage, and the road may be removed from the final version, due to the difficulties with Litchfield District and Staffordshire County Councils. It is not believed this road is included in the Staffordshire Structure Plan. The 'moderately beneficial' assessment is therefore not accepted. It is accepted that the road contravenes policies to protect the Green Belt, but it is not accepted that this can be minimised by mitigation.

Other Government Policies: There is no evidence that the road would support the policies listed.

Additional comments: Local residents are also concerned about light pollution across the entire Green Belt landscape. At 7.2m, local residents fear the road is not wide enough to carry the predicted traffic, and the council will need to widen it later, causing more noise and destruction.

Provision of information

Stonnall residents were only informed about the road when leaflets were distributed in February 2005. Some residents say no leaflets were delivered to them. There was one exhibition held in the village in March 2005, and the map exhibited was different to the map circulated with the consultation leaflet, showing the road closer to the village. Residents were only asked if they supported the three elements of the package, and were not asked about any other options.

Road Block would also like to draw to your attention that local residents and councillors were supplied with an incorrect and out of date AST by Walsall MBC. This was only noticed by myself, and had it not been, the local campaign would have been commenting on the wrong AST. Also, WMBC are still referring to the MSBC as an 'Annex E' submission, which has also caused confusion.

Lower Cost Alternative

There are also serious concerns about the Lower Cost Alternative. It is believed that the conversion of Barracks Lane into a major 'A' road will encourage traffic travelling south along the A5, to divert right and traverse along Barracks Lane to a new inter-section island with the A461.

Without redesign of the Shire Oak junction (A452/A461), the proposed changes of Barracks Lane will be wasted. This could be avoided if the traffic travelling south on the A5 was directed to Muckley Corner junction with the A461. Barracks Lane would remain untouched and restricted to freight of 7.5 tons only.

It is believed that this scheme would be a 'back door approach' by WMBC to demand a bypass at a later date across the Lichfield District Council Green Belt area, thereby avoiding remedial action at Shire Oak junction and upgrading the existing infrastructure of the A461 through to the A5 (Muckley Corner) intersection.

SUGGESTION: DfT ask Walsall MBC to look at the problems again, and appraise a realistic option that would be acceptable to neighbouring authorities and communities, will not increase road travel, will genuinely regenerate Brownhills, and will not destroy Green

Belt land. Improvements to existing infrastructure could achieve better results at lower cost, within Walsall MBC itself.

1.3 A140 Long Stratton Bypass, Norfolk

The main concern here for local residents is that there is no need for a dual carriageway, when a single would be sufficient. The A140 is not a strategic route, it was de-trunked a few years ago. Local residents inform us that planners in Norfolk & Suffolk (the road goes into Suffolk) say there are no plans to develop it as a major highway, or to dual any other sections. The dualling would be for 3 miles with a roundabout at each end - this will be noisy and dangerous for residents and the roundabouts at each end will be dangerous for motorists. Local residents say that engineers at County Hall have said that the traffic figures for dualling were borderline. No non-road alternatives were looked at.

SUGGESTION: The DfT request Norfolk County Council consider non-roadbuilding alternatives, or at the very least a single carriageway road.

2. Schemes going for Conditional / Full Approval, or for additional funding.

Road Block believes that road schemes should be given conditional or full approval only if they are appraised in accordance with the latest guidance, and if they still represent the best transport solution and value for money. The Department should not give approval simply because of a misplaced guilt that a local authority has progressed a bad scheme this far. The Department should have the courage to throw outdated schemes out of the LTP programme, especially where the costs have escalated due to local authorities underestimating the costs (and this was not noticed by the Government Offices), and the scheme no longer representing value for money.

2.1 Tunstall Northern Bypass

According to the December 2004 settlement letter, this scheme remains provisionally approved until the legal challenge has been settled. The legal challenge centres on the validity of the planning permission and whether the Secretary of State can confirm the Compulsory Purchase Orders if the planning permission is not valid. The case will be heard at the beginning of November 2005.

As the scheme is provisionally approved, it should be reappraised with the latest guidance before moving towards conditional or full approval. Stoke City Council are relying on an outdated 2003 Annex E submission, which is not in accordance with the latest government guidance. Although an AST has been produced dated May 2005, it simply seems to be a summary of the outdated 2003 Annex E submission. It has not significantly changed since the 2003 AST, except the PVB has miraculously doubled.

The AST and the Annex E submission rely on traffic modelling dating from 1996. As the traffic modelling is so out of date, it does not take into account significant changes in the local economy, such as the closure of the two main manufacturing industries in the town. This will dramatically impact on the council's claims of high levels of congestion.

The 2005 AST does not take into account other significant changes, including a new private developer road (the south western bypass), which has just been granted

permission. Also there is still a decision pending on the Hanley / Pentilee Link which was provisionally approved in 2000, but further appraisal was requested in 2003. It is not known whether the impact of the scheme should it go ahead is included in the 2003 appraisal for TNB, if it is relying on traffic forecasts from 1996. There are also concerns that the Annex E does not reflect the reality of bus passage in Stoke.

The road would destroy valuable heathland and part of the Scotia valley which is one of Stoke on Trent's Natural Heritage Sites. It will also open land to 400 new houses

SUGGESTION: The GOWM should ask Stoke City Council for updated appraisal that reflects the reality in Tunstall in 2005, to ensure that the Tunstall Northern Bypass remains the best transport solution, and represents best value for money. GOWM should be prepared to question the appraisal.

2.2 A127 / A1159 Priory Crescent, Southend on Sea

Southend on Sea BC are coming back to the government for additional funding for this scheme after significant cost escalation (more than a tripling: £3.5 million at Full Approval to £11.424 million for a 870m stretch).

Road Block is also very concerned that this scheme was given Full Approval in 2000, before the statutory procedures had been gone through (the public inquiry took place in 2004, with the CPOs confirmed in 2005). This is wholly unacceptable, and we would like you to respond to this.

The road scheme is very unpopular locally, with 20,000 objections collected by local campaigners. It would destroy an Anglo Saxon king's burial mound, described by the Chief Archaeologist of the Museum of London as "a discovery of international importance". It would also impact on Priory Park, a local green space, and cause the felling of 113 trees.

SUGGESTION: The DfT refuse the request for additional funding for the road aspect of the package. Southend on Sea and DfT should await the completion of the Travel Centre, and assess the impact of the A123 London Road bus passenger transport corridor on travel in the area, before wasting £11.24 million of public funds on this rather expensive 870m road.

3. Schemes that have been provisionally approved for over four years

Road Block was relieved to see in the latest guidance an acknowledgement that many local authorities were not progressing with schemes that had little chance of becoming concrete reality, and that schemes should exit the programme after four years if they had not progressed to the next approval stage (5.2.10). We would like to see this guidance applied to all schemes which were provisionally approved in 1999, 2000 and 2001.

3.1 Brunel Link and Harnham Relief Road, Wiltshire

This scheme was provisionally approved in 2000 at a cost of £13 million, with the cost estimate now rising to £20 million, and the scheme nowhere near completing statutory procedures. It is time to recognise a bad decision, and remove this scheme from the LTP

programme. An initial planning application in 2002 received 600 representations, with 97% against the proposals. That application was withdrawn, and the current planning application has attracted an even larger volume of responses (figures not yet available from Wiltshire County Council). Strong objections to the latest planning application have been submitted by the Environment Agency and English Nature / the Countryside Agency, and recently Salisbury District Council agreed to submit a holding objection because of concerns about the environmental impacts of the scheme.

The supposed rationale for the road is to improve HGV access to the Churchfields Industrial Estate in Salisbury. However there is a growing body of public opinion locally which supports an alternative vision for the future development of this estate, making better use of its prime riverside location and proximity to the station and city centre to provide employment opportunities in businesses and services which do not generate high volumes of HGV trips.

SUGGESTION: Withdraw the scheme from the LTP programme.

3.2 A39 Camelford Bypass, Cornwall

This scheme is opposed by the Camelford Chambers of Commerce and the Camelford Alternative Transport Solutions. The concerns are about the significant environmental damage (it will cross a SSSI and a cSAC), that the scheme will not solve the transport problems in Camelford, and does not represent good value for money, as the costs have more than doubled to £14.4 million.

SUGGESTION: Withdraw the scheme from the LTP programme.

3.3 Other schemes that should be considered to exit the LTP programme

The following schemes were provisionally approved in 1999, 2000 or 2001, and we understand have not progressed to the next approval stage, and should therefore be considered to exit the programme, as per 5.2.10 of the Major Schemes guidance:

Bedford Western Bypass – 1999
Ridgmont Bypass / Woburn Link – 1999
A505 Baldcock Bypass – 1999
Stowmarket Relief Road – 1999
Hodnet Bypass – 1999
East Kent Access Phase 1 - 2000
Owen Street Relief Road – 2000
Rugby Western Bypass – 2000
Hanley Bentilee Link – 2000
Glasshoughton Coalfields Link Road – 2000
A63 West Bawtry Road Improvements – 2000
Hemsworth to A1 Link Road – 2000
Glossop Spur – 2000
Hall Lane Area Improvements – 2000
Darlington Eastern Transport Corridor – 2000
A688 Wheatley Hill – Bowburn Link, Durham – 2000
A158/C541 Lincolnshire Coastal Access Improvement Phase 2 & 3 - 2000
Kiln Lane, Epsom – 2001

M4 J11 – 2001
A628 Cudworth & West Green Bypass – 2001
A57 (T) M1 J31 to Todwick Crossroads – 2001
Poole Bridge Regeneration Initiative – 2001
A1198 Papworth Everard Bypass – 2001
East Corridor South, Luton – 2001
Pegswood Bypass, Northumberland – 2001
A6096 Ilkeston – Awsworth Link – 2001
Matkham Employment Growth Zone, Derbyshire – 2001
Oakham Bypass - 2001

4. Major Scheme procedures, and the role of local people

4.1 Local authorities not following guidance – especially appraising alternatives

Our feedback from community groups is that a lot of local authorities do not follow the guidance, particularly regarding option identification and the appraisal of realistic alternatives. Of particular concern was the requirement to look at **non-roadbuilding** demand management alternatives to the scheme not being followed. Local people have said that in previous years, this failure has not been identified by Government Offices, and schemes have been approved that have never been appraised against schemes or measures that would genuinely reduce travel.

SUGGESTION: It is essential that the identification of bad schemes that have not followed the guidance happens at a very early level at the GO level, to prevent bad decisions being made, inferior schemes slipping through the net, and the Department left in a position where it feels unable to reverse bad decisions.

4.2 Alternative options not realistic, or not considered

Local people have complained that the consultation phases are often not adequate. Two patterns seem to be emerging: local people rejecting roads and voting for public transport improvements, but the local authority progress with their road plan anyway. Or local people are simply presented with a road, and asked where they would like it to go, with no analysis of other options to reduce travel.

We are advised that often the alternative options put forward by local authorities have no chance of success, are impractical, will be very unpopular, and are there simply to make the road 'look better'. The perception is that the 'alternatives' are not serious attempts to solve transport problems.

SUGGESTION: GOs fully investigate whether local authorities have seriously investigated alternatives to road building.

4.3. Local community involvement 'superficial'

Local people complain that it is incredibly hard to find out information. Many people have to submit repeated Freedom of Information requests to local authorities to receive the information they need to inform their position on any road proposals. The 'options'

supplied to local people at the consultation stage are often simply asking communities to choose between different road routes.

4.4 Processes too complicated

Local people often complain that they are understandably very confused by the complex procedures, especially the appraisal processes. We understand that the information is available on the WebTAG website, but this guidance is becoming more and more opaque and impenetrable, as more guidance is added. It is very difficult for working people with families to be able to monitor whether their local authority is following the guidance, and producing transport proposals of the highest quality. Local authorities rarely seem to help campaigners understand the appraisal procedures, or want to involve them in the problem and option identification stages. The perception is that the authority has often made its mind up already. If the processes were transparent, clear, and on-the-table, local people could play much more of a sensible, active, and less-confrontational role in planning their communities - which would be everyone's interests.

4.5 ASTs are highly subjective

Local people report that ASTs are often highly subjective and do not reflect reality on ground. The assessment column will often report a benefit, where local communities report there will be an adverse impact.

Conclusion

Road Block considers that local authorities rarely consider road building as a 'last resort', and that many do not appraise demand management and public transport alternatives before road proposals. It is up to the government to reject road schemes presented for 'programme entry' by local authorities that have not followed the guidance, if the guidance is to be worth anything. Otherwise, the perception will be that the guidance is there simply to create an illusion that there is such a thing as a "sustainable transport policy".

Yours sincerely

Rebecca Lush