

Matthew Lodge

Head of Local Transport Major Projects & Light Rail
Local Capital Programmes and Delivery
Department for Transport
Zone 2/14, Great Minster House
76 Marsham Street
LONDON SW1P 4DR

14 October 2011

Dear Matthew,

Development Pool submission from Campaign for Better Transport

This covering note and attachments, along with our earlier submission of a report on the lack of consultation for the four road schemes we have highlighted constitute the Campaign for Better Transport's national level submission to the Development Pool comments period.

Local Campaign for Better Transport groups may also be submitting their own comments on schemes in their areas.

Our comments are drawn from reports by consultants looking at the best and final bid (BAFB) documents for each scheme, views from local groups who have been working on the proposals from local authorities for some time, and our own analysis of the proposals.

There are two parts to our comments. First we have outlined some general principles we think should be applied to the choice of schemes to fund at this time and, second, we have produced individual reports on four road schemes, highlighting our criticisms of these bids.

General principles for the Development Pool

It is important that decisions taken on the development pool are considered in the context of wider policies, notably on the economy and promoting green growth.

This means that priority should be given to projects that will help areas significant to the economy, and recent research implies that the public transport projects in and around the cities should be given a high priority.^{1,2}

¹ <http://www.transportworks.org/>

² *Access all areas: Linking people to jobs*, Clayton, Smith & Tochtermann for Centre for Cities, September 2011

The public transport proposals we believe should be given a high priority include:

- Leeds New Generation Transit
- Leeds Rail Growth Package
- Manchester Cross City Bus
- Supertram Additional Vehicles
- Rochdale Interchange
- Pennine Reach (East Lancs Rapid Transit)
- South Yorkshire Bus Rapid Transit Northern Route
- Croxley Interchange
- Coventry Nuneaton Rail Upgrade

These schemes are all well developed, and most are ready to be implemented quickly so providing maximum economic stimulus. They are also financially robust proposals with a very low risk of failure. The local contributions to these schemes are viable either because they are backed by robust estimates of fare income and realistic local transport budget contributions, or because they are promoted by PTEs and will be funded out of their well-planned income and funding streams.

A focus on public transport projects will also create a larger number of UK jobs in terms of vehicles and infrastructure (research in the USA showed that investing in public transport produced twice as many jobs per dollar as spending on roads³) and the new services provided will continue to support jobs across the country after the project construction phase has ended.

In contrast, we believe that many of the big road schemes in the pool should not be funded for a number of reasons. Compared with the public transport schemes above they are, in the main, at a far earlier stage of planning, with regulatory hurdles still to cross, so will provide a much slower route to new jobs and economic benefits than public transport investment.

The ability of new roads to stimulate the economy at any point is questionable, and the benefits to the local economy are far lower than for public transport. In addition, they will not deal in the most effective or cost-effective way with congestion, and will harm the local environment too.

The four most opposed roads

In particular there are four roads upon which we have focused our objections: Bexhill-Hastings Link Road, Kingskerswell Bypass (South Devon Link Road), Norwich Northern Distributor Route and South Bristol Link Road.

In addition to the problems listed above, these are the schemes that we have identified as having the most significant local opposition, consisting of alliances spread across the local community and campaigning organisations. In establishing this, we have consulted a large number of groups and so we are reasonably confident that these are the only development pool schemes with opposition groups of this character, although some other proposals will face strong objections from individuals or groups campaigning on particular issues.

³ *Employment in Sustainable Transport*, Eksogen for pteg and Campaign for Better Transport, June 2010

These four schemes share some common problems:

- They are expensive; if built, these four schemes alone would account for 39% of the Development Pool funding from the DfT.
- They will not solve local congestion issues: instead they will simply move traffic jams to other parts of their local areas.
- The promoters have exaggerated the economic benefits, in particular by relying on small potential time savings, as detailed submissions from expert consultants have confirmed.
- The promoters' claims that the schemes will unlock extra development are exaggerated or just wrong: in reality, either associated development is unlikely to happen, won't happen without further investment not accounted for in the value for money calculations, or in other cases it will happen anyway without the road.
- While focusing on these roads, promoters have ignored alternative cheaper options for tackling traffic and transport problems, including alternative road options.
- Promoters' promises of obtaining third party funding apart from Government are unrealistic, depending as they do on the extra development as above, which may not materialise. When added to the Government contribution, the very high local contributions to these schemes represent an unacceptable level of public subsidy for these roads.
- Promoters have minimised or ignored opposition to the schemes through poor consultation, and there is a much higher risk of delays through protests and legal challenges than they have stated in their proposals.

While I understand why some councils and MPs will be pushing very hard for their local roads to be approved, the strategic case for these roads becomes very unclear when a regional or national economic perspective is applied and when relative congestion is taken into account. The submission from Devon Campaign to Protect Rural England illustrates this point very well when it says:

"The idea of spending about an eighth of the Major Scheme funds on the A380 through Kingskerswell would be puzzling to Manchester, Bristol, Birmingham or any other conurbation in the UK. In these places slow moving traffic is everywhere. Beautiful countryside on the other hand is in short supply and in the case of Devon, it is the countryside that visitors really value."

In summary:

- These road schemes will not help the economy; other schemes in the pool will do more, particularly public transport schemes in the cities.
- Their benefits and value for money claims are exaggerated.
- Some of the schemes face serious delivery problems through lack of other funding, local opposition and likely delays to statutory processes.

Yours sincerely,



Stephen Joseph

Chief Executive, Campaign for Better Transport

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