



Transport Activists' Roundtable North West

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Messrs. David Colbert & Alec Curley,
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Tuesday June 30th, 2009

Dear David, Alec and Peter,

REGIONAL ROUTE STUDIES – GUIDANCE FOR THE NORTH WEST versus ROUTE MANAGEMENT PLAN GUIDANCE FOR ROUTES OF REGIONAL SIGNIFICANCE AND OTHER PRIMARY ROUTES WITHIN THE NORTH WEST

Before commenting, as invited, on the working draft guidance of the document 'Regional Route Studies – Guidance for the North West', I would like to make some quite critical remarks about the way this project has changed since the Project Advisory Group (PAG) was set up, but without any say so by the PAG.

On December 12th, 2008 I received an e-mail from Alec Curley informing me that 4NW, the Leaders Forum, were commencing work on production of Route Management Strategy (RMS) Guidance for the North West, that the North West Transport Roundtable (NW TAR) had been identified as a core consultee for the project and as such we were being invited to meet on a one-to-one basis with the project manager, Peter Ramsey, from the appointed consultants, Mouchel. Attached to the e-mail was the 4NW brief for the project which strongly implied that a multi-modal approach would be adopted and which began with a statement that the Regional Spatial Strategy (RSS) is a statutory instrument with which every local authority must comply. It went on to quote the RSS and explain the prime purpose of the project:-

"Policy RT4 states that the Regional Planning Body is responsible for preparing guidance for the development of Route Management Plans for routes of regional significance. The purpose of this brief is to develop evidence-based guidance for use by the Highways Agency and local authorities, reflecting the Government's desire of achieving improved co-ordination of strategies at both regional and local levels".

[Author's underlining]

At the Examination in Public into the RSS, the NW TAR spoke in favour of RMSs along the same lines as those evolved by the Highways Agency (ie. multi-modal) being developed for local highway authorities. We were therefore pleased when they received endorsement in the adopted North West RSS to 2021: The North West Plan.

continued ...

I wasted no time in availing myself on behalf of the NW TAR of the opportunity to meet with Peter, which we did in his offices on December 18th, when I spoke to him of good and bad practice I had observed during the HA RMSs. Subsequently I attended the first meeting of the PAG at the HA offices in Manchester in February and expressed disappointment at it that the project seemed to be evolving with an entirely road-based (as opposed to corridor) focus. I also expressed concern that early criteria being spoken about appeared to be totally economic-based (bearing in mind the brief required '*respect for the environment*') (para. 2.4) and that there was a risk of the guidance being used as a mechanism to help deliver road projects. Some of my comments did receive support from other PAG members.

The same PAG were then assembled for a meeting on June 18th when we were presented with a *fait accomplis*. We were informed that the project had changed and immediately afterwards were sent the draft guidance.

It is accepted that 4NW are funding this study but, having set up a Project Advisory Group for a particular purpose, it seems quite extraordinary that their views were not sought about a change of direction, status, emphasis and purpose or were some members' views in fact canvassed and not others?

Instead of the guidance now being statutory and for the use of the Highways Agency and local authorities, "reflecting the Government's desire of achieving improved co-ordination of strategies", it is now apparently (according to the 'Introduction' to the document which PAG members are now being asked to comment upon) for the Regional Planning Body to use "with partner organisations and consultants" and it is only to serve as: "best practice for the North West's local highway authorities through which they **may** develop route studies".
[Author's underlining and highlighting]

The PAG are now being consulted upon a concept that they did not originally sign up to being a part of, which their one-to-one interviews were not about and which is merely proposed as optional best practice guidance, not - as was originally flagged - a statutory requirement. This seems to be a very strange state of affairs indeed.

Have there been discussions with other PAG members since the first meeting in February which the NW TAR have not been a party to? There was no adequate explanation offered at this recent meeting as to why or how this major change of direction came about. It seems unlikely the HA and local authority members of this PAG would have been unaware prior to the June 18th meeting that such a dramatic change of direction was taking place.

I have chosen to express my puzzlement and disquiet about the way this has all been handled in a formal submission because I am seeking a formal explanation in writing in response, please.

The North West Transport Roundtable are pleased to be awarded seats on Project Advisory Groups set up by regional agencies but, if we are not a full party to what is actually going on, then we are not really equal members of these bodies are we? This most recent experience leaves us very much with the feeling that some members of PAGs are more equal than others. We would like to believe this is not the case but look to be convinced it is not. A proper explanation of what happened with the original project in this case and why would be much appreciated. In the meantime, please see the separate comments on the document tabled.

Yours sincerely,

LILLIAN BURNS

Convenor, North West Transport Roundtable

Comments by the NW TAR on the Working Draft Regional Route Studies – Guidance for the North West

Over-arching comments

It would seem to the North West Transport Roundtable (NW TAR) that the main purpose in producing this guidance, indeed the only purpose, is if it adds value to existing appraisal processes and if it does so by introducing criteria which are forward thinking, which begin by accepting climate change arguments and which are equally balanced between economic, social and environmental considerations.

Paragraphs 2.4 and 2.5 in the original brief for the project stated:

“The guidance will have the overarching aim of aiding the Highways Agency and local authorities to achieve their objectives of delivering a high quality service to customers by

- *Improving road safety*
- *Making journeys more reliable and*
- *Respecting the environment*

The consultant should cross reference new guidance with existing Route Management Strategy guidance, highlighting the main differences, with a detailed explanation of any changes. The consultant should ensure that they fully consider relevant national Government policies, guidance and other publications, including Planning Policy Statements and Guidance Notes, the recently published Eddington Transport Study Report, the Stern Review on the Economics of Climate Change and the Barker Review of Land Use Planning”.

As local authorities have many means of “*delivering a high quality service*” to their customers in transport terms, the first of those two paragraphs appeared to imply a multi-modal approach. The second paragraph implies that a lead should be taken from the Highways Agency’s RMS Guidance, which was quite well developed. Their guidance required RMSs to “*interlock with local transport strategies (set out in Local Transport Plans)*” (para. 1.1.1), to refer to the multi-modal studies (para. 2.2.15) and to carry out consultation “*with relevant bodies ... Network Rail, public transport operators, British Waterways*” and it also saw public consultation as “*a necessary part of any RMS study*” (para. 2.2.28). This draft makes no mention of multi-modal studies or public consultation and neither public transport operators nor British Waterways are on the PAG (Network Rail were originally).

Also, it is not apparent the draft guidance has been influenced by the Stern Review or PPS 1 or its supplement on Climate Change, nor by PPG 13, which requires a reduction in the need to travel (a factor re-iterated in the RSS).

Introduction

The introduction is very unbalanced in the views it propounds. It makes an across-the-board connection between highways and economic prosperity and fails to heed Stern’s warnings that not taking climate change properly into account would actually work against economic success. Whilst DaSTS is mentioned briefly, climate change is not. Nor is any credence given here or elsewhere to the findings of the Standing Advisory Committee on Trunk Road Assessment (SACTRA) that -in a mature economy such as that which exists in the UK - there is no automatic connection between highways infrastructure and an improved economy (*Transport and the Economy, 1998*).

Overview

The national policy background overview should specifically mention the Stern Review and the Eddington Study which, apart from being mentioned in the original brief, are very much considered key government reference documents. Eddington, in the key findings of his report, acknowledged the work of Stern and the need for adequate attention to be paid to climate change and reducing in harmful emissions from transport.

Oddly, the national policy background makes no mention of the Treasury Green Book, which emphasises the need for a wide range of alternatives to be tested, nor of the DfT's web-based transport appraisal guidance, WebTAG.

The regional policy background section should give pre-eminence to the extant RSS, not to the emerging single integrated regional strategy. In planning terms, existing strategies rank above emerging ones.

Reference is made to "*A significant number of strategic regional development sites [that] have been identified*" (para. 2.1.3).

There are no specific strategic regional development sites in the extant RSS. There is merely an ever-growing aspirational list of such sites which emerges from the North West Development Agency. It has no endorsement via the regional planning process and should not be treated as though it has. Also, subsequently in the guidance, there does not appear to be a requirement to estimate extra traffic movements such sites would create (App. 1).

There is no reference to the North West Climate Change Action Plan, nor to the region's sustainability development framework nor to the sustainability toolkit.

N.B. There are some words missing from the first sentence of the final paragraph of the section on the regional policy background on page 5. We suggest the addition of the words "*and how*" between "*nor*" and "*to alter*".

The local policy background section makes reference to Local Transport Plans and to Local Development Frameworks but not to the Community Strategies which sit alongside them.

The Route Study Process (sections 2 & 3) does not appear to allow for the generation of a range of options as required by the Treasury Green Book and WebTAG. Smarter choices are mentioned once (2.2) and then ignored.

Stakeholder Involvement

Stakeholder involvement is raised at the end of section 2 and returned to in section 3. We are pleased to note the NW TAR is listed as a stakeholder but would submit that public transport providers and TravelWatch NW should also be there to ensure user interests are properly represented. The HA also included British Waterways.

Performance Assessment

The proposal is to use the "*standard assessment*" as to whether or not a route "*supports economic growth*", ie. to base it on (i) AADT (ie. annual average daily traffic), (2) journey time reliability and (3) annual average daily HGV flows (fig. 5.1) This shows no recognition of the way transport and economic appraisal is going, eg. of the need for proper economic impact appraisals, both at the local level and at the strategic level. If these assessments are the only measures which are to be included, what added value is this process bringing to the party? The same could be said for the remainder of the table, which only includes CO2 emissions (not, eg. PM10s) and KSI statistics (not slightly injured statistics). Where are the more sophisticated features which ought to be part of the mix?

Spatial Planning

Proposals for housing growth points and strategic regional sites should not be criteria. Who would decide what were realistic proposals and what were not? Only growth points/sites endorsed by the RS process should apply.