

Transport Activists' Roundtable

North West

www.nwtar.org.uk

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Monday, January 26th, 2009

Dear Mr. Bancroft,

Requested comments from regional stakeholder in response to consultation on draft advice on Regional Funding Allocations, round two

The enclosed submission is in response to the joint (undated) letter received immediately prior to Christmas from Stephen Broomhead, the Chief Executive of the North West Development Agency (NWDA) and Phil Robinson, the Chief Executive of 4NW, inviting comments before January 30th 2009 on the draft Regional Funding Advice 2 they published with their letter. That letter also issued an invitation to attend a regional event in Warrington on January 9th about RFA 2 - the details of which were not subsequently forthcoming. It was only when the North West Transport Roundtable (NW TAR) made enquiries a few days before the event as to whether it was in fact still taking place that details were sent and confirmation received that a place was available. We understand this oversight occurred also with other environmental colleagues.

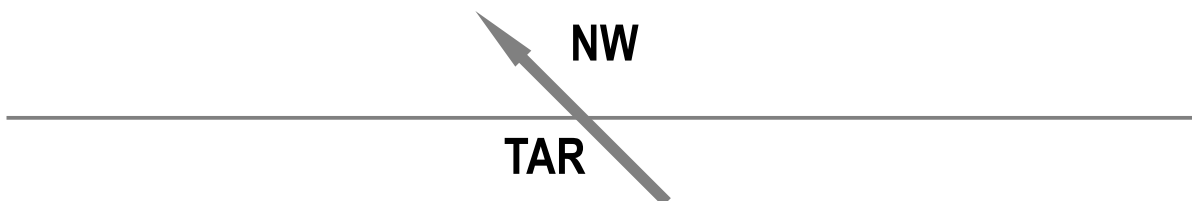
For the avoidance of any doubt, we would like to make it clear in this letter that we will welcome invitations to all wider stakeholder events organised by the Development Agency, particularly as our key focus is engaging with regional and sub-regional planning policy processes. We have a lot of knowledge and experience to bring to bear on planning policy-making and our involvement can help ensure the government's sustainability criteria are adhered to and balanced arguments put forward on social and environmental matters.

As far as the RFA is concerned, the NW TAR has a range of concerns relating to the lack of evidence required for schemes and the lack of inclusiveness in the decision-making processes - last time around and this time. On both occasions, environmental and social/voluntary non-governmental bodies have been allowed no more than token inputs after draft advice has been agreed by politicians and officers and the rushed consultations have straggled the Christmas and New Year holiday periods. That said, we feel we must at least try to make our voice heard as we represent a large body of opinion. We are signatories to the RFA 2 consultation response by North West Environment Link but, as transport experts, we wish to make this additional contribution. We trust that shortfalls in the RFA process will be addressed in future iterations.

Yours sincerely,

LILLIAN BURNS
Convenor, NW TAR

Invited submission on the
Regional Funding Allocations
Round 2
from the
Transport Activists' Roundtable
North West



January 2009

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INTRODUCTION

The North West Transport Activists Roundtable (NW TAR) is an umbrella body which represents organisations and individuals who believe in sustainable transport. Our terms of reference are available for scrutiny on our website (www.nwtar.org.uk). We operate under the auspices of the Campaign for Better Transport (formerly Transport 2000) and we have seats on a number of regional fora including the 4NW Regional Transport Group, the Regional Transport Advisory Group (RTAG) and the Highways Agency's Northern Environmental Committee.

This submission is an invited response to the consultation document '*Regional Funding Advice – the advice of the Northwest Region*' published jointly by the Northwest Regional Development Agency and the 4NW Leaders Forum in December 2008. For ease of cross-referencing, our side headings on this and the next page are the same as in the consultation document.

COMMENTS ON THE CONSULTATION DOCUMENT

FOREWORD [to the draft advice]

Appropriately, the document opens by referring to the "*fast changing policy environment*", a phrase repeated under '*Approach*' in para. 1.3. In fact, since the advice was drawn up, so much has happened that it would not be an exaggeration to say the policy and funding scene has altered in several fundamental ways. This is a list of just some of the key relevant events which have happened since late November when the advice document would have been written:

- The Climate Change Act became law at the end of November 2008, requiring reductions in greenhouse gas (GhG) emissions across the UK of 80% on 1990 levels by 2050
- '*Delivering a Sustainable Transport System*' (DaSTS) was launched for consultation in late Nov., calling for CO2 reductions to be core to all transport packages
- Also in late Nov., the Sec. of State for Transport offered the NW region £165 m. towards building the A555 Manchester Airport Link Roads whose delivery was not part of the RFA
- Guidance on LTP 3 was launched in Dec. 2008 requiring the development of sustainable transport systems and a significant contribution by transport to GhG emission targets
- The NWDA launched a consultation on over 30 strategic regional sites in Dec. 2008
- Also in Dec., the referendum on the Greater Manchester Transport Innovation Fund (inc. congestion charging) resulted in a resounding 'No' vote and will not now be pursued, leaving the partial funding of some NW public transport schemes via the RFA in doubt
- The Department for Transport published three documents on Britain's transport infrastructure in Jan. 2009. In addition to one on Heathrow Airport and another proposing a high speed rail link between London and the Midlands, there was '*Motorways and Major Trunk Roads*', which announced the government's intention to introduce extensive hard shoulder running on, amongst others, several NW motorways and also to add an extra lane to part of the M60 Greater Manchester Ring Road.

All of which will have significant impacts on extant transport strategies and ought to affect RFA advice, not only from this region, but from others.

Consequently, although the draft NW advice document maintains there are no plans for significant changes to the RFA priorities list, it is now understood a basic re-think is underway. We also feel obliged to challenge the claim that an "*extensive consultation process across the region*" has been carried out on this RFA advice. This is an overstatement. Nor has Annex E, referred to in the penultimate para. of the foreword, been widely published and consulted on.

OVERVIEW [to the draft advice]

Apart from one short sentence recognising that the region has significant natural environmental assets and almost a fifth of its land area is designated as National Park and another short one reporting that 8% of the population are made up of ethnic minorities representing 150 countries, the 'Overview' in the draft advice document is entirely economic focused. This is not, therefore, a balanced appraisal which gives equal weight to environmental, social and economic matters.

PROGRESS SINCE RFA 1

Similarly, para 1.3 outlining the 'Approach to RFA 2' lacks a holistic approach and fails to set out how the region will meet GhG reduction targets. It repeats the claim (now understood to be incorrect) that the NW's RFA advice "*does not propose changes to future priorities at this point*".

PRIORITIES FOR ECONOMIC DEVELOPMENT, HOUSING & TRANSPORT

The transport schemes listed in the tables on pages 12 – 15, inc., are, as indicated previously, those that were endorsed through the RFA 1 process of which NW TAR was fundamentally critical. Once again economic benefits are assumed with no cognisance of the findings by the government's independent advisers SACTRA - the Standing Advisory Committee on Trunk Road Assessment - that economic benefits do not automatically accrue from the provision of transport infrastructure. The promoters of the various schemes were not required to submit economic impact assessments as part of the decision-making process and were in fact only obliged to supply cursory details. This was the anomalous state of affairs for RFA 1 and it has not subsequently been set right. Also, the reference to Multi-Area Agreements here is noted. These are new forms of working which have so far proved inaccessible to wider stakeholders.

ANNEX A – TRANSPORT SPENDING PRIORITIES

The Transport Spending Priorities 'Key Issues' section makes one welcome statement, ie. "*Road traffic is a major source of carbon dioxide emissions, with increasing car use contributing towards global warming and climate change*". However, it does not then go on to back that statement with any facts and figures. Similarly, the 'Key Objectives' section does, grudgingly acknowledge "*On the other hand, RSS also reflects the need to manage travel demand, reduce the need to travel and increase accessibility*". In fact, the RSS does much more than "*reflect*" these matters, they are key over-arching principles which should carry a lot of weight.

The 'Transport Investment Programme' section acknowledges the extent to which the RFA programme is over-programmed due to cost increases but implies this can be dealt with by deferring some expenditure. In view of the scale of the overspend, this is clearly not going to be adequate action to take - even before all the other issues arose which are listed on the previous page. A reference to the Secretary of State's announcement in respect of partial funding for the Manchester Airport Link Roads has been inserted (obviously as a last minute addition) at this point in the document, but not with any conclusions/ suggested actions being drawn. The fact of the matter is that the government handed the job to the regions of coming forward with their own transport advice. Whilst the North West had allocated some funds for preparatory work on the network of schemes of which these were a part, it had not – up to that point - chosen to recommend funding the delivery any of these schemes within the RFA 1 or 2 timescales. So, the government's intervention could fairly be described as unduly attempting to influence the process and impose on it particularly unsustainable projects. This was unhelpful and will merely exacerbate debates about 'roads versus roads' rather than 'roads versus sustainable transport'.

COMPLIANCE WITH THE RFA GUIDANCE

The Regional Funding Advice Guidance was published by several government departments in July 2008. It required regions to integrate skills provision throughout their deliberations and to promote sustainable economic development. It said:

“The regions will need to ensure the priorities are aligned, supported by a strong evidence base and that there is widespread consensus among regional and local partners and in the public, private and third sectors” (para.1.1). [NB. Our underlining].

The need for a strong evidence base is then re-iterated in para. 4.6 of the guidance. Despite this, in the North West, policy alignment and sound evidence need much improvement, eg. the strategic regional sites which the North West Development Agency are promoting, have no or little relationship with RFA transport priorities. The same applies to growth area aspirations. The actual evidence which the promoters of transport schemes supplied to Atkins consultants for the first round of the RFA was abysmally lacking in detail and substance - and that shortfall has not been corrected this time around. Meanwhile the regional and local ‘partners’ and the statutory environmental agencies, have been kept at a distance from decision-making fora.

The RFA guidance also says:

“The advice should set out how the proposed portfolio of investment will meet the region’s objective to raise the rate of sustainable economic growth and help deliver relevant PSAs. Greater weight will be given to advice that demonstrates the contribution to national priorities. The advice should illustrate a clear prioritisation of investment and should explain the trade-offs that have been made with the evidence base supporting difficult decisions.

Since decisions on economic development, housing and regeneration, transport and skills are inter-related and inter-dependent, the advice should demonstrate an integrated approach to investment, demonstrating the linkages between decisions across funding streams”. (paras. 4.2 & 4.3).

As far as PSAs (public service agreements) are concerned, it should be recognised that advice which will result in increased CO2 emissions and poorer air quality will be contrary to PSA 12 (*Improve health and well being of children and young people*), PSA 18 (*Promote health and well being for all*) and PSA 28 (*Secure a healthy natural environment for today and the future*) as well as to para. A.3 (which flags up Stern) and para. A.26 (specifically on CO2 emissions) of the RFA guidance. Any advice that fails to take into account the UK’s climate change and GhG reduction targets would be contrary to PSA 27 (*Lead the global effort to avoid dangerous climate change*) as well as flying in the face of national and regional legislation. In addition, increased scheme costs need to be judged against guidance para. A.28 on Value for Money.

The supplementary RFA guidance published in August 2008 was more specific than the original on the issue of over-programming, which it condoned by up to 20% for each region. But, in the case of the NW, the latest revised costings have revealed over-programming to be in excess of 35% and still rising. This situation ought to mean that schemes which least comply with current guidance, PSA agreements, policies and strategies should be the first to fall out of the listings. On this basis, the A57/ A628 Mottram-Tintwistle Bypass and the co-dependent Glossop Spur are strong contenders and NW TAR wish to endorse submissions made by both Friends of the Peak District and the Campaign for National Parks calling for support for these environmentally damaging schemes to be dropped. If they were, the region’s overspend would be addressed in one action – although it would not solve the dilemmas caused by recent government announcements on Manchester Airport Link Roads and motorway hard-shoulder running.

COMPLIANCE WITH THE DfT's STRATEGIC OBJECTIVES

The Department for Transport (DfT) has four strategic objectives. They are:

- to sustain economic growth and improve productivity through reliable and efficient transport networks
- to improve the environmental performance of transport and tackle climate change
- to strengthen the safety and security of transport and
- to enhance access to jobs, services and social networks, inc. the most disadvantaged

With the exception of the economic one, these objectives have played little part in the choice of the NW RFA transport priorities to date and economic decisions have been mainly judgemental.

COMPLIANCE WITH TaSTS & DaSTS

In October 2007 the DfT set out the government's approach to strategic transport planning for 2014 and beyond in '*Towards a Sustainable Transport System*' (TaSTS). This involved taking forward the recommendations which emerged from Eddington and Stern, both of whom recognised that emissions from transport were a significant and growing contributor (over 25%) to the UK's overall GhG emissions and that those emissions would impact on long term economic growth. Rod Eddington said: "*It is essential, both from an economic and environmental perspective, that the environmental impacts of transport are fully reflected in decision-making*" and also: "*Because the UK is already well connected, the key economic challenge is therefore to improve the performance of the existing network*". (The Eddington Transport Study, Dec. 2006, key findings & recommendations, p. 5 & 6). Lord Stern warned that governments would ignore climate change at their peril and a key fall-out from doing so would be the economy (Stern Review on the Economics of Climate Change, Oct. 2006).

TaSTS was followed by DaSTS in November 2008 - '*Delivering a Sustainable Transport System*' - open for consultation until the end of February. This makes the case that sustainable transport systems will not be delivered from 2014 onwards unless investment packages for national, regional and city transport networks set out how they will deliver quantified reductions in GhG emissions. And it proposes that policy-making should be guided by five key challenges: (1) tackling climate change, (2) supporting economic growth, (3) promoting equality of opportunity, (4) contributing to better safety, security and health and (5) improving quality of life.

DaSTS also identifies 14 strategic national corridors that will be the focus of DfT attention from 2014 onwards. Two directly affect the North West – Corridor 8 (London via the West Midlands and the North West to Scotland) and Corridor 9 (Trans Pennine). The latter includes the M62 from Liverpool, via the periphery of Greater Manchester, to Hull but not the A57/ A628/ A616 route across the Pennines. Only the rail route from Manchester to Sheffield is considered of strategic national importance, not the Woodhead, Snake Pass or Hope Valley highway routes. This therefore significantly diminishes the case for the A57/A628 Mottram-Tintwistle Bypass which is currently causing major problems in the NW RFA listings through its spiralling costs.

COMPLIANCE WITH REGIONAL POLICIES & STRATEGIES

RFA advice should comply with the statutory Regional Spatial Strategy (RSS), key principles of which include managing travel demand, reducing the need to travel, reducing emissions and adapting to climate change – but little on the present list does. It should also comply with the region's sustainability framework, Action for Sustainability, which is supposed to rank equally with the RSS and the Regional Economic Strategy, and the NW Climate Change Action Plan. 'Smarter choices', strongly endorsed by the Northern Way (as well as the DfT), do not feature, but could if a decision were made to set aside some of the allocation for schemes under £5m.

COMPLICATING FACTORS

Two recent government initiatives in particular have made the RFA process especially complex. The first was the announcement on November 25th by Geoff Hoon, the Secretary of State for Transport, that he was going to make extra money available for transport projects, including accelerating plans to make better use of the existing motorway network, plus some limited motorway widening and also earmarking funding to increase capacity on road links leading to key airport and ports. This was made at the same time he launched the DaSTS document. DaSTS itself re-classified the following routes in the North West as national ones from 2014:

- the A556 from the M6 to the M56 (based on the argument that it provides access to a strategic destination - Manchester)
- the M57 and also the A5036 from the M57 to the A565 (because they provides access to an international gateway – the Port of Liverpool) and
- the M61 (because it links strategic destinations – Manchester and Scotland)

The second was the further announcement by Geoff Hoon on January 15th when he launched the three transport infrastructure documents mentioned in the introduction to this paper. One of them, *'Motorways and Major Trunk Roads'* revealed the government's intention to start work during 2010/11 and 2011/12 on:

- adding a lane to the eastbound M60 around Manchester between junctions 12 to 15
- introducing hard-shoulder running on the M60 between junctions 8 to 12 and
- introducing hard shoulder running on the M62 between junctions 18 and 20

These plans pre-empt proposals in DaSTS and elsewhere (including in the infrastructure document) to introduce hard-shoulder running on parts of the M6 as far north as Knutsford, on the westerly end of the M62 and on the eastern part of the M56 around Manchester Airport.

Worryingly, these proposals do not appear to have given any thought to the fact that increasing motorway network capacity so much will increase traffic on roads leading to and from them. In most cases these are not scheduled for improvement and have not so far been considered as part of the RFA debate. Nor have environmental capacity or environmental implications been flagged up. For instance, the 'Access to the Port of Liverpool' scheme, now designated as of national importance, would decimate the Rimmer Valley which the Mersey Forest (the largest of England's 12 community forest projects) describes as *"a green finger of countryside in an urban area"* and *"a recreation area transformed with footpaths, bridges, boardwalks and tree planting"* [and includes] *"Brookvale which has been enhanced as a Local Nature Reserve with reed warblers already in residence"*. NW TAR has seen nothing in the 'Access to Port of Liverpool' proposals which acknowledges this locally important environmental area, recognises it lies within a flood plain or explains how it fits with the Highways Agency's biodiversity action plans.

Similarly, the offer as part of the first announcement, of £165 m. of government money towards building the A555 Manchester Airport Link Roads (west and east) is another initiative with many complicating factors. The A555 Link Roads are part of a network of road schemes dubbed the 'SEMMMS Relief Roads' after the South East Manchester Multi-Study recommended they should go ahead, although at a much reduced standard to that which was remitted to the study and along with a package of other transport improvements. These would impact on several ponds containing great crested newts and other protected species but the key points to make here are that there has been no traffic modelling carried out to ascertain the effects of building just these roads but not the connecting ones, the planning process has not even begun and yet these schemes are supposed to be deliverable within the RFA 2 period and the region itself has not chosen to place any of the SEMMMS schemes in its own RFA listings. It has hitherto merely made financial provision for the design of the schemes, (which it was intended would be delivered through a private finance initiative), and the purchase of land and property.

CONCLUSIONS

Government rationale on transport policy has become increasingly tortuous and hard to comprehend. On the one hand, in the 1990s, it accepted seminal reports by SACTRA, its own independent advisers, (since stood down). They proved that providing more highways capacity generates more traffic and also that, in a mature economy such as that which exists in the UK, there is no automatic economic benefit from the provision of major transport infrastructure. The government has declared in several White Papers, Green Papers and command papers since 1997 that the UK cannot build itself out of its transport problems. It has recognised that lots of 'smarter choices' or 'soft measures' can cumulatively have an exponential effect on traffic growth. It now declares that it wants to lead the world in combating climate change and says it supports moves – indeed demands moves from others - to reduce greenhouse gas emissions.

On the other hand the government not only continues to approve one environmentally damaging road scheme after another but to make pronouncements such as the most recent ones that it intends to promote hard shoulder running on motorways (thereby increasing GhG emissions along with the increased traffic), add extra lanes to some motorways and support the building of roads to airports (not to mention the construction of extra infrastructure at airports), despite the fact that flying is the most polluting form of travel of all.

Also, on the one hand the government has said to the regions that they are to take the bulk of the responsibility for deciding how transport funding should be spent and yet on the other they have come forward with recent interventions which throw the region's deliberations into turmoil.

NW TAR fear that all of this uncertainty and confusion will merely serve to further stir up rivalries that already exist between different parts of the region and different authorities. This is more likely to lead to political arguments about who gets an endorsement for which road rather than a restrained holistic debate about the environmental, social and economic benefits and disbenefits of various schemes and interventions.

OUR ADVICE

Being realistic, we are well aware that any advice which the Regional Leaders Forum, the North West Development Agency and the regional government office receive from wider stakeholders a few weeks before they have to submit their recommendations to central government is not likely to have a huge amount of impact. Certainly, we recognise there is no likelihood at this late stage when the public consultation is taking place in asking for a complete re-appraisal of all schemes currently in the RFA programme (although we believe there should be one next time around because the present list is based on such shaky foundations).

However, the regional decision-makers no longer have the option of re-endorsing the previously approved list. Intuitive hard choices will be the order of the day. We would ask them to take a step backwards and ask themselves 'What would be best for the health and well-being of the region and most likely to lead to a sustainable future?' The answer, we would hope, is that they would want to see the citizens of the region enjoying safe and reliable transport systems, with choice as to mode, whilst enjoying good air quality, a pleasant public realm, open spaces in built up areas and great landscapes. The most obviously environmentally damaging schemes such as the Mottram-Tintwistle Bypass and the Glossop Spur should be set aside in favour of good maintenance and making better use of that which exists, improved public transport and modest-sized schemes/ smart choices which make the most contribution to local environments. In this submission we have provided the decision-makers with plenty of evidence of non compliance to aid their difficult task. Future generations would thank them for their foresight and good sense.

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