

Robert Bancroft
Policy Officer
Northwest Development Agency (NWDA)
PO Box 37
Renaissance House
Centre Park
Warrington WA1 1XB

January 30th 2009

Response from Save Swallow's Wood to the 4NW and NWDA Regional Funding Advice Consultation,
December 2008 (NW RFA)

The Government guidance specifies four criteria against which the NW RFA should be made: i) the evidence base, ii) realism, iii) value for money, and iv) consistency with strategies and with national and multi-area agreements. We consider that the A628 bypass fails to meet each of these criteria for the reasons outlined below, and that RFA2 is an opportunity for 4NW to reconsider their support for this scheme and reallocate the funds to schemes that offer better value for money while also supporting national and regional policies on sustainable travel and climate change.

i) The Evidence Base

The A628 Mottram-Tintwistle scheme places a considerable strain on the NW RFA budget. When the scheme first entered the RFA on the basis of its place on the Government's Targeted Programme of Improvements (in 2001) there had been no public test of the scheme, no details published, no scrutiny of the forecast impacts on the economy or environment, and the cost was estimated at a mere £90 million. Since then the public inquiry has started and stalled, the cost of the scheme has ballooned and the credibility of the scheme called into question.

In short, there was no evidence base when the RFA was last considered, but since then the Highways Agency have published the details of the scheme and the inquiry has begun. In January 2006 the scheme details were first published, however, following the initial three month consultation, the Highways Agency admitted to errors and the revised documents were again published for consultation in January 2007. In total, 2770 objectors and 1469 supporters responded. The objectors include some major players, namely the Peak District National Park Authority and Natural England, and an alliance of environmental charities and NGOs supported by a strong local opposition. This level of opposition did not exist when the last RFA decision was made, as none of the details of the scheme were available for scrutiny.

While the scheme details have now at least been published, its reliability is still in doubt. Since the scheme was first published in January 2006, the evidence has been revised five times, and as a consequence the public inquiry has adjourned indefinitely. Despite the fact that the public inquiry sat on only 15 days since it was first launched, it is the longest running public inquiry into a road scheme in the UK. Because of the many revisions and the increasing complexity of the inquiry, the Inspector for the inquiry has set out a number of conditions that the Highways Agency must meet before the inquiry can

resume¹. At the time of writing there is no indication from the Highways Agency as to when or if this will occur so we believe further delays are likely.

ii) Realism

Given the delays to the inquiry so far, the repeated revisions made by the Highways Agency in the attempt to present the correct information on the scheme, and the wildly optimistic cost estimates on which are currently allocated to the scheme, it seems increasingly unrealistic to assume that the timetable advocated by the scheme promoters is likely to be met. Given that there is no date set for the inquiry to resume, and when it does there is no guarantee that it will reach a conclusion and not be adjourned again, it seems unlikely that there will be a decision regarding the scheme prior to the next General Election in 2010. It is also worth 4NW considering that any decision made by the Secretary of State in favour of the scheme will more than likely be subject to a legal challenge by the various objectors, meaning further delays and increased costs.

Another possibility, based on a precedent set in the Thames Gateway Bridge inquiry which was also subject to repeated delays owing to incomplete and incorrect evidence submitted by the promoters, is that the Inspector may rule that he is unable to make a decision based on lack of confidence in the evidence, as happened. In that event, the Inquiry process would have to begin again and further delays would be inevitable.²

Further, we question how realistic the figure of £242.2 million listed in RFA 2 table of schemes³ is, given it is at the lower end of the £223 and £315 million range published by the DfT⁴. Since this range is an increase of between 20% to 71% on the £184 million published only a year earlier⁵ and further delays have been encountered since the revised estimate was published we anticipate that the scheme costs will rise further.

iii) Value for Money

At no point since the scheme first entered the TPI has there been any investigation into whether the scheme is good value for money compared to non-road building alternatives. If the scheme goes ahead and comes out at the upper limit of the budget it will cost an estimated £100 million per mile, equivalent to £56,000 per metre of tarmac. Given that the scheme is forecast to have a negative impact on many local communities in Mottram, Stalybridge, and Denton, with only negligible benefits to residents in some parts of Hollingworth, we disagree with any assessment that the scheme offers value for money.

Given the additional pressures the credit crunch will place on already struggling communities within the North West and considering that "in research by the Audit Commission, more than half of job seekers indicated that lack of private transport inhibited them from getting a job, whilst a quarter said they had

1 Preparation for the resumption of the inquiry, Inspector's Inquiry Note, Document X/20, 18/12/08

2 http://www.persona.uk.com/thamesgateway/DECISION/Planning_report.pdf and
http://www.persona.uk.com/thamesgateway/DECISION/Inspectors_report.pdf

3 Page 23, Regional Funding Advice, The Advice of the Northwest Region, December 2008

4 Highways Agency Major Roads Programme: Updated Scheme Cost Estimates, 16 July 2008

5 Review of Highways Agency's Major Roads Programme, July 2007

been unable to get a job due to poor public transport.”⁶ we consider the money allocated to this scheme would be better spent and deliver greater benefits to more people in the North West by focussing on integrated public transport and non-motorised alternatives. Such an approach would comply with NW RSS Policy RT 2, which focusses on reducing private car use and encouraging “smarter choices”.

To put the E315 million in context, the Sustainable Travel Towns pilot projects showed that an investment of just £2 million per year resulted in reductions in car use from between 11%, 12%, and 13% and increases in all areas of public and non-motorised transport⁷. We consider such an approach to offer much better value for money and be more consistent with the various policies in the North West RSS relating to sustainable travel, environmental protection, and the social and economic objectives for the region.

iv) Consistency with strategies and with national and multi-area agreements

In the consultation document 4NW state as one of their aims that of, “tackling climate change and mitigating its effects”⁸ and making the issue of tackling climate change “central to the region’s transport plans.”⁹ This document also acknowledges that, “It is now widely accepted that constructing new roads to accommodate future traffic growth is neither environmentally nor economically sustainable. The emphasis should therefore be on increasing the role of public transport together with making best use of existing highway infrastructure through the development of effective strategies for network and demand management.”

As we emphasise in our response to the public inquiry, local CO₂ emissions are set to increase by over 9% if the scheme is built (versus the baseline “Do Nothing” scenario) , an increase of 15,000 tonnes per year. Levels of other pollutants, such as NO_x and PM10s, are also forecast to increase. This is at odds with various local, regional, and national policies, including:

- The Climate Change Act 2008, with the target of a 60% reduction of greenhouse gas emissions by 2050 (against the 1990 baseline).
- NW RSS Policy DP 9: Reduce Emissions and Adapt to Climate Change¹⁰
- A Climate Change Action Plan for England’s Northwest 2007-09

The Highways Agency state in their evidence to the Inquiry (published in 2007—currently being revised) that several Government other policies relating to climate change^{11 12} will be adversely affected by this scheme.

6 NW Objective 2 SPD, 2001, quoted from the *Economic Impact Report, Mott MacDonald, February 2007*

7 Letter to Gillian Merron’s letter to Chief Executives on the success of the Sustainable Travel Towns. See <http://www.dft.gov.uk/pgr/sustainable/demonstrationtowns/lettersustainabletraveltowns.pdf>

8 Regional Funding Advice, The Advice of the Northwest Region, December 2008

9 Regional Funding Advice, The Advice of the Northwest Region, December 2008

10 The North West of England Plan Regional Spatial Strategy to 2021, September 2008.

11 Energy White Paper - Our Energy Future Creating a Low Carbon Economy, DTI (2003)

12 Climate Change - the UK Programme, DEFRA (2000)

Conclusion

Climate change is not just an environmental issue: it will have a detrimental effect on the health, well-being, and economic prosperity of all human populations, with the cost of global inaction estimated at between 5% and 20% of global GDP¹³. We consider that the 4NW should take the matter of climate change seriously and use their influence to build a sustainable transport system that rises to the challenges we face. We are, therefore, concerned that the CO₂ data for each scheme was not included in RFA2 consultation but hope the information we have been able to provide relating to Mottram Tintwistle will be of interest.

Research released in 2005 by the Liberal Democrats showed that Tameside was the worst offending local authority when it comes to reducing road traffic and improving public transport. Their research showed that the number of vehicles on the road in Tameside has increased by 36% since 1997. If the A628 bypass and A57 Glossop Spur are built, a further increase of 37% vehicles per day is predicted on the A57/A628 route alone. The traffic increases will adversely affect residents in Mottram, Stalybridge, Glossop, and Denton, and lead to increases in pollution, including climate changing CO₂ emissions.

Given these impacts and the uncertainty regarding the scheme's progress through the statutory procedures, as well as concerns about the reliability of the evidence presented by the Highways Agency, we urge 4NW and NWDA to consider withdrawing funding for the A628 bypass and A57 Glossop Spur. We consider the money would be better spent on other schemes in the RFA programme that will deliver greater benefits to the economy while also being compatible with latest policy and thinking on transport and the environment.

13 *Stern Review: The Economics of Climate Change*, 2006, Executive Summary