

Steve Berry
Department for Transport
Zone 3/19
Great Minster House
76 Marsham Street
LONDON
SW1P 4DR

25 February 2008

Dear Steve

Re: Devon County Council's Major Scheme Business Case for the proposed A380 South Devon Link Road (Kingskerswell Bypass).

Thank you for giving Campaign for Better Transport the opportunity to comment on the Business Case for the proposed South Devon Link Road (aka Kingskerswell Bypass).

We note that Steer, Davies, Gleeve have examined the scheme on behalf of the Kingskerswell Alliance, and that their report on the quality of the Business Case has been sent to the DfT, along with a report by the Kingskerswell Alliance. We support these submissions, and would like to add our own.

As you know we have had a long involvement with this scheme, and with the local group. I have visited the area on several occasions and am very familiar with the scheme. Campaign for Better Transport is very concerned that this very expensive scheme is not a sustainable solution to the transport situation in this part of Devon. The scheme will lead to an increase in traffic, noise, air pollution and carbon emissions. It will also lead to destruction of a beautiful rural landscape and the settings of important historic monuments.

Lack of recent analysis of options and non-road alternatives

We are very concerned that Devon County Council have not properly examined non-road alternatives to the scheme, as required by the DfT's major schemes guidance. Instead they have relied on outdated reports, which dismissed at an early stage low-cost solutions which the DfT now require local authorities to examine. The 'next best' and 'low cost' options are simply variations on the proposed road scheme.

In Section 3 of the business case (the Strategic Case), Devon County Council admit that their analysis of the problems and possible options stem from the *A380 Newton Abbot to Torquay Corridor Study* (The Corridor Study) which was produced in 2000, and is now 8 years out of date. The '*Options Assessment and Strategy Development Report*' (Halcrow Fox, January 2001) included in the business case is now over 7 years old, and ruled out online improvements and measures to promote modal shift from the study (see 4.2.2 of the above Halcrow Fox report).

The reliance of Devon County Council on out dated studies which rule out sustainable and low cost options does not fit with current DfT guidance on examination of alternatives¹:

2.5.1 The [Eddington report](#), published in December 2006, confirms the importance of a strategic process to identify transport problems. It is important to start with current and future strategic priorities, and then generate a wide range of options covering different types of interventions or measures including all modes, infrastructure, regulation, pricing and other ways of influencing behaviour and consider all modes and then undertake a high level of assessment of these options.

2.5.7 For highway schemes there should be a consideration of different link/junction standards and other alternatives to address the problems in the area, such as public transport provision, demand management policies, traffic management measures and strategies. The Department would expect authorities promoting highway schemes to examine the scope for achieving the scheme objectives through non-road building options such as public transport improvements or demand management measures. Suitable options should be included in the option appraisal process. If the promoting authority concludes that non-road building options are not capable of delivering the objectives, robust evidence to demonstrate this should be provided in the MSBC.

Campaign for Better Transport recommends that DfT rejects this bid for funding, as per the major schemes guidance:

2.5.5 Any major scheme for which the appraisal of alternative options is considered inadequate or where the Department considers alternative options to be preferable, may not be accepted for funding.

There is no recent and robust evidence to demonstrate a thorough analysis of options, as required by the DfT's major schemes guidance, and the approach recommended by the Eddington transport study.

Comments on the AST

General:

We are concerned the Department is still appraising transport schemes using the old NATA system that is currently under review. We have serious concerns about the way that economic benefits are calculated and assumed, using journey time savings and fuel duty revenue increases. We would caution the Department about assessing business cases for controversial schemes whilst the

¹ *Guidance for Local Authorities seeking Government funding for major transport schemes*, DfT, August 2007

<http://www.dft.gov.uk/pgr/regional/ltp/major/majorschemeguide/majorguidemain?page=2#a1011>

NATA refresh is underway. We recommend the DfT read our joint report with the Green Alliance on transport appraisal² to understand Campaign for Better Transport's concerns regarding the robustness of the NATA appraisal framework in delivering sustainable transport options.

The AST claims that the 'problem' is a 'degraded environment in the village', yet the proposed scheme would further degrade another part of the village. Throughout the AST there is an inconsistency between the Qualitative Impacts column and the Quantitative Assessment column.

Noise:

In the Qualitative Impacts column, the AST claims that traffic will pass through 'a more rural environment', yet in the Quantitative Assessment column it shows that 415 **more** people would be annoyed by noise **with** the scheme. The assessment should also show how previously tranquil areas would be destroyed.

Local Air Quality:

In the Qualitative Impacts column, the AST claims that 'the scheme has an overall beneficial impact' yet then later says that in the opening year (2013) 'Do Something compared to Do Minimum shows NOx emissions **increase** by 30 (13%) tonnes; PM10 emissions **increase** by 0.7 tonnes (10%). This is clearly not an 'overall beneficial impact'. The Quantitative Assessment then contradicts this further by claiming that more properties would see an improvement, despite the Qualitative Impacts column showing an **increase** in emissions.

Greenhouse Gases:

The scheme leads to an increase in carbon emissions. This is unacceptable; especially given that scientists tell us we must do all we can to urgently reduce emissions by 80% by 2050. Very shortly a Climate Change Act will make carbon reduction targets legally binding. In any event the Government is committed to reducing emissions to 12.5% below 1990 levels, and move towards a 20% reduction below 1990 levels by 2010. We believe that the DfT should have a presumption against approving any transport schemes that lead to a net increase in emissions, no matter how small the local authority claims they are.

The DfT has a shared responsibility to deliver the PSA target on climate change (PSA27) announced in the Comprehensive Spending Review 2007. In the Delivery Strategy for the PSA for climate change it says³:

The DfT will ensure that transport policies balance the increasing demand for travel against protecting the environment and improving quality of life. DfT will work to improve the environmental performance of transport, addressing the provision of 'smarter choices', including promotion of travel planning, sustainable travel towns, cycling and walking. Consistent with the recommendations of the Stern Review, DfT will develop policies that achieve carbon savings from measures that are cost-effective in the short term and establish the frameworks, market signals and information to secure a more fundamental shift towards environmentally friendly transport in the future.

² *Decision-making for sustainable transport*, Keith Buchan, Metropolitan Transport Research Unit, February 2008

<http://www.green-alliance.org.uk/uploadedFiles/Publications/reports/Decision-making%20for%20sustainable%20transport.pdf>

³ PSA Delivery Agreement 27: Lead the global effort to avoid dangerous climate change, October 2007
http://www.hm-treasury.gov.uk/media/9/2/pbr_csr07_psa27.pdf

Approving a road scheme that increases carbon emissions, and will not secure “a more fundamental shift towards environmentally friendly transport” will not assist the DfT in meeting its PSA27 responsibilities. **We believe this business case should be rejected on this ground (increasing carbon emissions) alone.**

Looking closely at the worksheets for the carbon impacts, it shows that whilst additional emissions created each year by the scheme are shown to decline steadily until 2028, at 2028 emissions stabilise at an increase of 1719 tonnes per annum for each year up to 2072. There is no evidence given to show **how** additional emissions are expected to decline. We would expect with the predicted increases in traffic that emissions would continue to grow.

We believe that strong evidence exists that demonstrates that traffic increases are frequently underestimated by road schemes promoters⁴. Therefore the carbon impacts claimed by Devon County Council could be much higher, and we ask the DfT to examine this closely.

Also, the Kingskerswell Alliance local group inform us that the carbon emissions now claimed in the business case are significantly lower than those claimed in the Environmental Statement produced for the scheme in 2005. We would urge the DfT to examine this crucial area closely.

Landscape:

We disagree with the Qualitative Impact assessment which claims the impact is not significant, and the landscape is of low sensitivity. The landscape is beautiful and tranquil. Kingskerswell Down is particularly special. This is the quietest side of the village, with the oldest properties, and the impact of a dual carriageway on this quiet landscape would be enormous. This area is not already ‘compromised’ by development, but is very unspoilt. Mitigation could not improve on a dual carriageway running through such an unspoilt tranquil landscape.

Townscape:

The road simply shifts traffic from one part of Kingskerswell, and dumps it in another (leading to acknowledged traffic increases, and subsequent noise, air pollution and carbon increases). The part of the village the traffic is dumped into is the most special and oldest part of the village. The Noise sub-objective already acknowledges that more people will suffer as a result of this shift in traffic. We do not accept Devon County Council (DCC) claims that the scheme will lead to a ‘slight beneficial’ impact on the village townscape. We believe this assessment should be ‘moderate adverse’.

Heritage:

We are concerned that English Heritage do not seem to be responding to this scheme, as there is no maternity cover for their previous transport specialist. The scheme impacts on **two** Scheduled Ancient Monuments (SAMs), one of which is a Bronze Age field pattern which Devon County Council acknowledge is nationally important. Kerswell Down SAM is a wonderful resource for the local community, but its setting would be devastated by the road.

Biodiversity:

We agree with the large adverse assessment for the scheme. We believe that endangered species should be treated as such. The lesser horseshoe bat and the Cirl bunting are internationally important, and any damage to their habitat is unacceptable.

Physical fitness:

The area of land the bypass goes through is used extensively by local people for walking and recreation, especially Kerswell Downs. The area would be very unpleasant for walkers with a road

⁴ Beyond Transport Infrastructure, Lilli Matson, Dr Ian Taylor, Lynn Sloman and John Elliott, July 2006
http://www.countryside.gov.uk/Images/Beyond%20Transport%20Infrastructure%20-%20full%20report_tcm2-29759.pdf

through it. There would therefore be a decline in walking and physical activity in this area, and the assessment should therefore be slight adverse.

Journey ambience:

The fact that 'open views' will be seen through motorist's windscreens means that open countryside will be destroyed, and this should not be counted as a benefit.

Public Accounts:

There is not enough detail in the public accounts sub-objective. We would expect to see an estimate of full construction costs, how much the local authority contribution would be, and how much of the 'benefit' of the scheme is through increased fuel revenues.

TEE – Business and Consumers:

We are not convinced the economic benefits are as great as Devon County Council claim, and note there is a reliance on journey time savings to indicate economic benefits, whereas the NATA refresh indicates there will be a move away from this approach, towards measuring journey time reliability. We urge DfT to closely examine Steer Davies Gleeve's analysis on the perceived economic benefits of the scheme.

Wider economic impacts:

We would question the beneficial assessment, and the Qualitative Impacts column's assessment that the scheme would create 3,554 jobs. We would draw the DfT's attention to the 1999 SACTRA Transport and the economy report, and the recent DfT command paper, *Towards a Sustainable Transport System*: "There are some important messages in the Eddington study about not exaggerating transport's ability to stimulate job creation. Unless adequacy of skills and other issues are properly addressed, improved transport connections could as easily suck employment from an area as create new jobs in it."⁵

Option values:

Devon County Council admits here that the scheme will not change bus services.

Access to the transport system:

Elsewhere Devon County Council acknowledge the scheme will increase traffic (in the Greenhouse gas sub-objective), yet here they claim there will be "no change to private car ownership".

Transport Interchange:

Devon County Council claim there will be "improved accessibility, reliability, and journey times for public transport services", yet in the Option values sub-objective they admit "no change to bus and rail services envisaged".

Policy:

The scheme goes against PPG13: *Transport*. The objectives of PPG13 are:

1. *promote more sustainable transport choices for both people and for moving freight;*
2. *promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and*
3. *reduce the need to travel, especially by car.*

⁵ Towards a Sustainable Transport System, DfT, October 2007, para 2.79
<http://www.dft.gov.uk/about/strategy/transportstrategy/pdfsustaintranssystem.pdf>

Devon County Council acknowledge the scheme will increase traffic. Therefore the scheme runs counter to PPG13.

The scheme also goes against PPS 1: *Delivering Sustainable Development*, and the supplement to PPS1 on climate change, as the scheme will increase carbon emissions, damage landscapes and historic resources. It also goes against Planning Policy Statement 7: *Sustainable Development in Rural Areas*.

General comments on the business case

Public Acceptability Assessment

There is no information in the business case about public acceptability. This scheme is extremely controversial locally, with the Kingskerswell Alliance having successfully fielded candidates in Parish Council election, and gaining over 2000 signatures for a Parliamentary Petition that was presented to Parliament in 2007. Public meetings about the scheme are extremely well attended and the Alliance is well supported locally.

Regional Funding Allocation (RFA):

We would also like to comment on the Regional Funding Allocation (RFA) position of this scheme. In the advice submitted to the DfT in January 2006, the South West region could not prioritise within its RFA budget and significantly over programmed its RFA, which means that many of those schemes are unaffordable within RFA budgets. Since then the region has failed to recognise this, and the SW RFA remains over programmed. When the next round of RFA advice goes to DfT in early 2009, it is crucial that the region this time prioritises within its RFA budget, and that the DfT only accepts advice that is within budget. Until then, the position of Table 2 schemes within the RFA should be treated with some caution.

The region submitted schemes in different tables. The Kingskerswell Bypass was only in Table 2 – i.e. not a firm priority. The DfT accepted this advice and published the list of RFA schemes for the SW region, with the caveat that Table 2 schemes could be “**potential additions to the RFA**, subject to environmental impact, affordability, deliverability and statutory procedures”. Therefore the Kingskerswell Bypass is not firmly placed within the RFA.

Draft Regional Spatial Strategy (RSS):

The RSS has not been finalised. However the report of the Examination in Public panel into the draft Regional Spatial Strategy was published in January 2008. It did not support the South Devon Link Road, and instead said “*the project needs to be evaluated against the other transportation needs of the area.*”⁶

Until the final RSS is published, the Regional Planning Guidance for the South West [RPG10] is the relevant planning framework⁷. Nowhere in RPG10 is there support for the Kingskerswell Bypass. At table 6 it lists infrastructure needed to deliver sustainable growth, and it does not list the Kingskerswell Bypass. Policies TRAN 1, 5 and 10 all commit to reducing the need to travel, encouraging walking, cycling and public transport and managing demand. The Kingskerswell Bypass would run against these policies, as it would increase traffic growth.

⁶ Draft Regional Spatial Strategy for the South West, Panel report, January 2008, para 4.5.20
http://www.southwest-ra.gov.uk/media/SWRA/RSS%20Documents/EiP%20Panels%20Report/SW_RSS_EiP_Report_Section_1_-_Main_Report.pdf

⁷ Regional Planning Guidance for the South West (RPG 10), DTLR, September 2001
http://www.gos.gov.uk/497666/docs/166217/regional_planning_guidance

Regional Economic Strategy (RES):

The RES does not support a South Devon Link Road

If you have any questions about this response, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R Lush Blum', with a stylized flourish at the end.

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