

Response to A27 Corridor Feasibility Study Draft Scope Document

Submitted to Department of Transport

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1. Concerns about remit and scope of the feasibility study

Campaign for Better Transport (CfBT) is concerned that the whole premise of these studies appears to be to enable more roadbuilding regardless of whether that makes sense economically, environmentally or socially. There are significant obstacles to upgrading the A27 between Portsmouth and Pevensey, which is why it has not been done to date. This was accepted by Department for Transport (DfT) officials at the meeting in January in Brighton. CfBT is therefore surprised that solutions to current perceived problems are expected to be found within such a tight timescale as this feasibility study is being run.

Historically a lot of time and effort has been put into looking at the south coast transport corridor in a more holistic way. The South Coast Multi-Modal Study, although completed in 2002, is still relevant today in many respects. Yet a lot of its recommendations, particularly on non-roads based measures, have not been implemented. Had this been the case, some of the currently perceived problems along the A27 might have been reduced or even solved.

In relation to this, CfBT is concerned that within this study little account is proposed to be taken of how other (non-road) measures might be able to ameliorate some of the A27 corridor issues. Many of these measures could well be cheaper, have better cost benefit ratios and be quicker to implement. Yet, this study is only going to consider evaluating proposals that are in existing local highway authority or railway development plans. It is not going to consider what might be a better way of delivering improvements and appears focussed on road based solutions, if that is possible. This is a serious oversight and will undermine the cost effectiveness and success of any proposals.

Consequently, CfBT believes that this study is fundamentally flawed, but if it is to proceed then it needs to ask far more searching questions and to broaden its scope so that it doesn't end up wasting public money or simply shifting the problem to other parts of the road network.

2. Amendments to existing questions to be addressed

The suggested amendments (in red) to the existing questions that are to be addressed as outlined in section 6 of the DfT document:

“6.1 There are a number of questions that need to be addressed as part of the study work, and these are set out below:

- *Given the assessment of the current and future performance of the A27 corridor are there specific priority locations / problems that should be addressed?*
- *Are there viable potential solutions to these problems which are deliverable, affordable and offer value for money?*
- *What are the potential timescales for the delivery of identified potential solutions?*
- *Are there additional, complimentary improvements to the local transport network necessary to maximise the benefits **or mitigate** the impacts from the transport investment?*
- *Have the potential solutions identified fully considered and optimised the environmental opportunities and mitigation that the transport investment could bring?*
- *Is further work / analysis required for Government to be able to make specific investment decisions, and if so what is the timescale of such work?”*

3. Proposed new questions to be addressed

CfBT is concerned that the currently proposed questions will not adequately test any forthcoming proposals to determine their full impact and it is therefore suggesting the following additional questions be addressed by the study:

- By implementing any potential solutions, what would the impact on other parts of the A27 corridor be? [after question 2]
- What is cumulative impact on the South Downs National Park of addressing the issues along the A27 and any subsequent economic development?
- Are there non-roads based solutions which could be delivered and at cheaper cost than upgrading the A27?
- What planning controls will be necessary to ensure that new development close to the A27 does not generate significant new road journeys and congestion?
- What impact will any forthcoming proposals have on reducing carbon emissions and how will they contribute to reducing obesity and improving public health?

4. Comments on reference group

CfBT believes that the DfT should consider whether the study project board should have some wider representation to ensure that stakeholder viewpoints are properly understood at the board level.

Regarding the A27 reference group, CfBT would be concerned if the proposed structure allowed for a lot of duplication of representation. Many local authorities have representation on the Local Enterprise Partnerships, for example, as do business organisations, yet all of these bodies are proposed to be given seats on the reference group. In contrast, the very wide range of transport, conservation, wildlife and broader environmental non-government organisations are listed as a single entity under the potentially misleading 'environmental non-governmental organisations'. Many of these bodies have strong social aims too.

Missing from the reference group stakeholder list is the health sector, particularly health promotion, along with other transport interests such as bus and rail providers. If the proper impact of any forthcoming proposals is to be fully understood, then they need to be subject to proper scrutiny and debate.

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Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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