



A380 South Devon Link Road (Kingskerswell Bypass)

Public Inquiry

**Devon County Council's Response to
Written Representation by Thomas Frith (OBJ/FRITH(54)/WR/1):**

Response by David Black

with contributions by:

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Michael Smith

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1 Introduction

- 1.1 This Response to the Written Representation of Thomas Frith (**OBJ/FRITH(54)/WR/1**) has been prepared by David Black (with contributions from Ian Harrison, Michael Smith, Robert Hetherington and Bethan Tuckett-Jones)
- 1.2 Thomas Frith, in his letter to the Department of Transport (October 2008), objected to the Scheme on the grounds that the road would restrict access to common land and playing fields. A perceived lack of assessment of road building alternatives has been cited and therefore the Scheme's impact on Climate Change and Sustainability called into question. Thomas Frith also objects on the grounds that no mention has been made of the potential liability and financial exposure due to the adjacent toxic waste tip.
- 1.3 A response to Thomas Frith's letter was provided in the following Proofs of Evidence:
- DCC/P/1 section 11.2.1-11.2.4 and 11.3.1-11.3.5
 - DCC/P/2 section 7.1.1-7.1.6
 - DCC/P/3 section 11.1. 72-11.2.75, 11.1.81-11.1.85 and 11.1.86 – 11.1.88
 - DCC/P/6 section 11.10.1-11.10.3
 - DCC/P/8 section 7.7.1-7.7.2
- 1.4 In his Written Representation, Thomas Frith raises several issues regarding the Scheme, these are as follows:
- The description of congestion on the A380 is incorrect;
 - The Scheme is not in keeping with research on Government Policies on climate change;
 - The Scheme will not bring back jobs and investment to South Devon;
 - Alternatives have not been investigated;
 - There is uncertainty in the economic case, changes in costs and benefits have occurred in the latest value for money exercise;
 - Changes have occurred in the Scheme at Kerswell Down;
 - Biodiversity Issues.

2 Congestion on the A380

- 2.1 Paragraph 1.2 calls into the question the description of the congestion and delays on the A380.
- 2.2 DCC/P/4, Table 4 shows that average journey times regularly double the free flow time of 7:00 minutes. An extra 30 minutes on some journey times were experienced during ANPR surveys along the route which is considered wholly unacceptable.

3 Government Policy (contribution from Ian Harrison)

- 3.1 Paragraph 1.2, Thomas Frith states that the Scheme is, 'not in keeping with the research on Government Policies on climate change and environmental protection'. In Paragraph 1.4 it is suggested that the Scheme could be what Eddington called a 'grand projet'.
- 3.2 DCC/P/4, paragraph 2.2.2 shows that the scheme is targeted at the pinch point of the strategic road network and is therefore in keeping with the principles of the Eddington Transport Study.

- 3.3 DCC/P/2, paragraph 5.1.3 shows that the Scheme is an example of a project that addresses specific problems associated with an inter-urban corridor between the major conurbations of Exeter and Torbay. DCC/P/4, paragraph 2.2.2 also shows that the Scheme is targeted at the pinch point of the strategic road network and is therefore in keeping with the principles of the Eddington Transport Study.
- 3.4 The quote provided in Thomas Frith's evidence (paragraph 1.2) regarding 'grand projet' has been taken out of context. When The Eddington Transport Study refers to 'grand projets' it in fact refers to larger scale projects such as high speed rail lines, likely to cost billions of pounds.
- 3.5 The Scheme accords with the principles in Delivering a Sustainable Transport System (DaSTS). DCC/P/2, paragraph 5.2.3 gives the five goals for transport; the Scheme fits all five of the goals and aligns with emerging transport policy. In particular the Scheme will improve journey time reliability along the corridor, the importance of which is stated in DCC/P/2, paragraph 5.2.5.
- 3.6 As stated in DCC/P/2, paragraph 5.4.3, 'the proposed Scheme provides a very real example of delivering a transport solution that has wider benefits for Torbay and the South Devon Area'
- 3.7 In terms of cost efficiency, DCC/P/2 Section 5.3 refers to the New Approach to Appraisal Refresh 2009. The Scheme has been placed in the 'Very High' category under value for money, identifying it as one of the very best schemes.
- 3.8 With reference to DCC/A/4, Appendix 11, Paragraph 3.8.10 it can be seen that on a regional scale, the increases in pollutant emissions are considered to be negligible. Emissions are also predicted to increase with the Kingskerswell Alliance proposals. Under the Scheme there will be decrease in emissions over baseline levels due to improvements in vehicle technology.

4 The Economic Case (Contributed by Robert Hetherington)

- 4.1 In paragraph 1.3, Thomas Frith suggests that building a new road is not necessarily the way to bring jobs and investment to South Devon. The investment is also questioned in light of the global recession.
- 4.2 Robert Hetherington's evidence, DCC/P/5 paragraph 6.1.14, accepts that improved access is one of the elements to realise the wider economic benefits to the Torbay economy and other investments will be necessary. DCC/P/5 identifies the other likely sources of funding in section 2 of the evidence, paragraph 2.2 identifies possible opportunities from the European Funding, paragraph 2.3.4 identifies the possibility of money from the Regional Development Agency. An example of where new funding has recently been obtained for Torbay is shown in DCC/P/5 paragraph 2.8.1, this shows a £2.2 million grant towards new infrastructure.

5 Alternatives to the Scheme

- 5.1 Paragraphs 1.4 and 1.5 suggest that alternatives to a road scheme have not been investigated fully and that no refreshing has taken place to take account of the latest research on modal shift, sustainable travel etc.
- 5.2 The Overview and Scheme Development Proof of Evidence (DCC/P/1) describes the A380 Newton Abbot to Torquay Corridor Study in Section 5.2 and explains the methods used to identify the problems to be addressed and the wide range of options developed for assessment. Within the 'Option Assessment and Final Strategy Report', a sequence of options were considered:

- Independent Measures – measures would come about regardless of any scheme;
- Traffic Management and Control Measures;
- Schemes to Encourage Modal Shift;
- On-Line Highway Schemes;
- Off-Line Highway Schemes;
- Complementary Measures.

5.3 Traffic management and control measures were rejected as they were likely to push problems onto other parts of the network. On line schemes were also rejected due to the likely impact on the environment (including severance) in Kingskerswell and the necessary land acquisition.

5.4 It was only on completion of this study and in recognition of its conclusion that a bypass was necessary, together with a package of sustainable transport measures, that Devon County Council and Torbay Council resolved to adopt the findings of the study in June 2000. This integrated transport strategy approach to the corridor is described in Chapter 6 of DCC/P/1.

5.5 Having completed the high level assessment of these options, the submission of Devon County Council's Major Scheme Business Case document required the assessment of three sub-options for a western bypass (Low Cost, Next Best and Preferred); these have all been appraised in detail.

5.6 The appraisal of the Scheme has since been updated for the purposes of this Inquiry; in parallel an appraisal of the Kingskerswell Alliance Scheme has also been completed. In conclusion it can be seen that a full exploration of available options has been undertaken.

5.7 DCC/P/4, Section 4.2 gives details of the travel planning that has taken place in Devon and the considerable work completed by Devon County Council in this area. Despite this congestion on the A380 shows no signs of relief.

5.8 DCC/P/4, Table 42 gives an assessment of the Scheme against the accessibility objective. This recognises the opportunities available on the existing A380 to provide improved public transport priority through Kingskerswell, leading to improved journey time reliability and support from Stagecoach (DCC/P/4, Paragraph 12.3.2).

5.9 DCC/P/4, Table 42 gives further details of the opportunities for improved pedestrian and cycling facilities in Kingskerswell, traffic calming measures on parallel roads which encourage the use of these roads by vulnerable road users.

5.10 With reference to DCC/P/4, Paragraph 12.5.1 it can be seen that reinstatement of the railway station at Kingskerswell has been included as part of the longer term transportation strategy in the Devon Structure Plan. While the potential for alleviation of congestion from the A380 is small it would be a step in the right direction and set a policy for the longer term to encourage more travel by rail (see DCC/P/4, paragraph 12.5.4).

5.11 It is emphasised the Scheme including the bypass is the only option which will alleviate congestion and provide capacity for public transport improvements.

6 Value for Money (with contribution from Bethan Tuckett-Jones)

6.1 Thomas Frith (paragraph 1.4) suggests that the Scheme may be an example of, 'speculative projects that do not deliver the promised benefits'. Section 2 questions the changes in costs, benefits and BCR between the Major Scheme Business Case, in December 2007, and the latest economic report (CD5.31A).

- 6.2 In particular Thomas Frith (paragraph 2.5) questions the changes in business, consumer, accident benefits and the omission of monetised noise and greenhouse gas benefits.
- 6.3 For the purposes of this Inquiry, updated traffic and economic assessments have been completed in full compliance with the appropriate current guidance from the DfT. An adherence to this guidance eliminates the risk of reporting over inflated benefits for the Scheme.
- 6.4 With reference to DCC/P/4 it can be seen that the Quantified Cost Estimate is £120.859 million (Q2, 2008 prices). DCC/P/4, Table 37 shows that the scheme has a BCR of 7.46 which represents excellent value for money.
- 6.5 In the process of updating the Traffic and Economic assessment the results of the Value for Money exercise has changed, though the size of these changes is not significant. Table 1 provides a comparison of the Value for Money exercise in the Major Scheme Business Case and the Value for Money exercise in the updated work.
- 6.6 Table 1: Comparison of Results of Value for Money Exercise

	Dec '07	May '09
Noise	-£14,100	-£3,567
Greenhouse Gases	-£3,500	-£869
Accidents	£48,019	£60,858
Consumer Users	£285,785	£376,199
Business Users and Providers	£440,622	£389,664
Present Value of Benefits	£756,826	822,285
Public Accounts	£98,535 (corrected)	118,257
Tax Revenue	-£3,702 (corrected)	-£7,370
Present Value of Costs (PVC)	£94,833	£110,887
Net Present Value (NPV)	£661,993	£715,834
Benefit to Cost Ratio (BCR)	7.98	7.41

- 6.7 Public accounts and tax revenue have been corrected in the above table and therefore a small discrepancy exists between Table 1 and the evidence of Thomas Frith (section 2.4).
- 6.8 Values were not included for Noise and Air Quality within the updated Economics report (CD5.31A) as the report only dealt with the calculation of benefits relating to accidents, travel time and vehicle operating costs. For the purposes of comparison these have now been included in Table 1 (taken from DCC/A/4, Appendix 11, Appendix 1).

- 6.9 As described in the Air Quality Proof of Evidence (DCC/P/10), Section 7, the methodology and reporting requirements for emissions of greenhouse gases have been updated since the publication of the ES. Specifically, WebTAG (CD 4.45) now requires the monetisation of carbon emissions over a 60 year period. This largely explains the discrepancy between the values in Table 1 under greenhouse gases.
- 6.10 The changes in costs used in the Value for Money exercise between Dec 2007 and May 2009 are in fact marginal. The differences in costs have arisen because the DfT has advised that the optimism bias added to construction costs in the Value for Money exercise should be changed from 15% to 44%. With Optimism Bias included and prices converted to a 2002 base and discounted to 2002, the cost for the scheme has changed from £98.535m to £118.257m.
- 6.11 The changes in traffic modelling methodology simply reflect the updated guidance issued by the DfT and the latest land use assumptions given in the Regional Spatial Strategy and TEMPRO. Changes to the business and consumer benefits calculated are due to changes in traffic modelling methodology and are again not significant.
- 6.12 Accident benefits have increased as the COBA model (used to calculate accident benefits) has been updated with the latest available accident data over a 5 year period.

7 Kerswell Down (Contributed by Michael Smith)

- 7.1 Thomas Frith expresses concern that the Acquiring Authority is changing its proposals with regard to Exchange Land “very late in the day”.
- 7.2 The Overview and Scheme Development Proof of Evidence (DCC/P/1) describes the Exchange Land in Section 9 and the precarious nature of the current access rights. It also goes on to describe the additional steps that the Acquiring Authority is taking to provide additional Exchange Land in order to put the issue of whether the proposed Exchange Land is equally advantageous or not beyond doubt.
- 7.3 The decision to acquire additional Exchange Land was taken in direct response to concerns raised by the Parish Council and other local people regarding the adequacy of the Exchange Land contained in the Compulsory Purchase Order. The proposal has been discussed in detail with the Parish Council and the Acquiring Authority also arranged a public meeting in the village on 23 June 2009 to explain the development of this proposal and to respond to any questions.

8 Biodiversity losses (Contributed by Michael Smith)

- 8.1 Thomas Frith, in his Written Representation (section 3) makes reference to the fact that the exchange common land will not ‘harbour the same variety of wildlife’ (as the two narrow strips of woodland at the end of Kerswell Down that will be lost to the Scheme).
- 8.2 Devon County Council have offered to provide funding for a conservation management plan and initial conservation management of the existing exchange common land woodland, and to provide a planting plan and funding for establishment of new woodland on the additional exchange common land plot (currently grassland).
- 8.3 The existing exchange common land woodland is, like much of the woodland habitat across the southern section of Kerswell Down, a rather simply-structured habitat that could be substantially improved for wildlife as a result of proactive conservation management. Such management would improve the diversity and

conservation value of this plot in a comparatively short space of time (5-10 years).

- 8.4 Woodland planting on the additional exchange common land would be designed with wildlife conservation in mind: a native tree and a shrub understorey would be established, together with a locally characteristic woodland field layer, in order to maximise nature conservation value as quickly as possible (the site is presently an impoverished fenced and grazed pasture).
- 8.5 By year 15 under such management the area would have started to develop into woodland and its nature conservation value would have increased substantially.