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## **Response to the consultation on draft guidelines for Funding Transport Infrastructure for strategically significant developments**

Given that this proposal relates primarily to schemes which will be essentially national in character, we will limit our comments to the following points.

The guidelines raise a number of wider questions and issues for us.

### Funding relationships

What is the relationship between the additional funding that might be made available to transport infrastructure that supports Strategically Significant Developments (SSDs) and existing national and sub-national transport funding streams and budgets? This questions becomes particularly acute given that in its TaSTs strategy the DfT implies that transport funding for the next few years is already allocated. Given that we consider that there is a mismatch between the share of national transport funding that the city regions currently receive and the needs of their economies (as well as the growing gap in spend per head between London and the next tier of city regions) we would be concerned if the funding available to us were to be reduced in favour of a new funding stream for projects deemed by Government to be strategically significant.

In the medium to long term TaSTs envisages a process whereby spending on transport is allocated on the basis of a clear and transparent funding framework which in turn rests on clear and agreed priorities and objectives. The guidelines imply that there will be a framework whereby strategically significant developments will be able to access national transport spending to support them. It is not clear how this will relate to the TaSTs approach to a national transport strategy.

## Involvement of Local Transport Authorities

A major focus of the guidelines is ensuring that the contributions of developers and of national government to supporting infrastructure for an SSD are fair and reasonable for both parties. The guidance appears to be less concerned with where the boundaries might lie between transport infrastructure in support of SSDs and that which is now, or might have been, provided by a local transport authority. New access roads to the existing road network for an SSD in a currently inaccessible brown or green field site would perhaps be easy to categorise as provision that would be eligible under the new guidelines. More difficult to isolate would be improvements to the wider public transport network which would support not only the SSD but might also form part of a wider upgrade of the local public transport network envisaged by a Local Transport Authority (LTA) in its LTP. We suggest that early and extensive consultation with LTAs would therefore be beneficial to both the developer, national Government (in maximising the benefits of its additional investment and in minimising any unintended consequences for local transport networks and budgets) and the LTAs themselves as part of their wider role in meeting the transport needs of the areas they serve.

The Guidance also suggests that the DfT will directly appraise and fund transport infrastructure in support of SSDs. No role appears to be envisaged for LTAs in these arrangements.

However, the nature of some of this supporting infrastructure could well be local in character (such those relating to provision of high quality bus access) and will almost always have an impact on local transport infrastructure (for example where access roads join the local road network and the resulting changes to traffic flows on local road networks). There is a strong case for therefore involving local transport authorities in these arrangements. There could also be a case for giving the LTA a role in appraising, and in the funding of these schemes (ie routing additional national funds for a scheme via the LTA). This would accord with wider devolutionary principles but would also have other specific advantages. For example it could open up opportunities to add additional funding sources to stimulate or supplement existing funding packages or proposals. For example if bus priority schemes were required to support an SSD there could be economies of scale in adding the additional funding for the SSD with existing funding for bus priority measures in order to purchase a more extensive and beneficial package of bus priority schemes.

I hope these comments are helpful and would be pleased to be kept informed about the development of these proposals.

Best regards

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Assistant Director