

Cabinet
Council

13 March 2012
20 March 2012

Name of Cabinet Member:

Cabinet Member (City Development) - Councillor Bigham

Director Approving Submission of the report:

Director City Services and Development

Ward(s) affected:

All

Title:

Response to consultation – Devolving Local Major Transport Schemes

Is this a key decision?

No

Executive Summary:

The Council is being asked to approve a proposed response to a Government consultation, which has been issued by the Department for Transport. The consultation is seeking local authorities, Local Enterprise Partnerships (LEPs) and the general public's views on a proposal to devolve transport major scheme funding from a national to local level.

Currently local authorities are required to submit detailed major scheme business cases to the Government to obtain funds for major transport schemes over £5m. The future proposal is for the Government to distribute funding to new Local Transport Bodies (LTB's) based on the geographical boundaries of LEPs. It will be for the new LTB's to prioritise a programme of major schemes, demonstrate value for money and determine the appropriate delivery bodies.

Recommendations:

Cabinet is requested to recommend that Council:

- (1) Approve the proposed response to the Department for Transport's consultation titled Devolving Local Major Transport Schemes as set out in Appendix 2 to this report noting in particular:
 - a. A preference for receiving the full devolved major scheme funding allocation direct to a new democratically accountable and led Local Transport Body without top slicing by government or other organisations.
 - b. That the ability to deliver individual schemes with other Local Transport Bodies is welcomed, either as a consortia or joint partners. However, decisions regarding how the funding allocation received is discharged should be solely directed by a

Local Transport Body based on the Coventry and Warwickshire Local Enterprise Partnership geography..

- (2) Endorse the opening of discussions with Warwickshire County Council, Centro and the Coventry & Warwickshire Local Enterprise Partnership regarding the future formation of a Local Transport Body.

Council is requested to

- (1) Approve the proposed response to the Department for Transport's consultation titled Devolving Local Major Transport Schemes, as set out in Appendix 2 to this report, noting in particular:
 - a. A preference for receiving the full devolved major scheme funding allocation direct to a new democratically accountable and led Local Transport Body without top slicing by government or other organisations.
 - b. That the ability to deliver individual schemes with other Local Transport Bodies is welcomed, either as a consortia or joint partners. However, decisions regarding how the funding allocation received is discharged should be solely directed by a Local Transport Body based on the Coventry and Warwickshire Local Enterprise Partnership geography.
- (2) Endorse the opening of discussions with Warwickshire County Council, Centro and the Coventry & Warwickshire Local Enterprise Partnership regarding the future formation of a Local Transport Body.

List of Appendices included:

Appendix 1 - Summary of the questions, options and proposed response.
Appendix 2 - Copy of the formal consultation response, including detailed comments.

Other useful background papers:

Consultation on Devolving Local Major Transport Schemes for the Next Spending Review Period
<http://www.dft.gov.uk/news/statements/grenning-20120131/>

Has it been or will it be considered by Scrutiny?

No

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

No

Will this report go to Council?

Yes

20 March 2012

Report title:

1. Context (or background)

1.1 At the end of January the Department for Transport published its consultation paper on the devolution of local major transport scheme funding. The consultation document sets out how the devolution process could work, the governance necessary, and the assurances required to ensure that investment returns are maximised.

2. Options considered and recommended proposal

2.1 Currently major scheme funding is accessed via direct bids to Government. Applications are expensive to assemble, requiring significant evidence and documentation. Schemes have to go through repeated assessment gateways, where much of the information is re-evaluated and re-produced before funding is confirmed. This work is all undertaken at the scheme promoter's risk, which can be a significant barrier to progress a scheme. The process has recently been successfully achieved for the Coventry-Nuneaton Rail Line Upgrade, in which Coventry has led a partnership with Warwickshire and Centro.

2.2 The consultation paper proposes that bids for major scheme funding would no longer need to be submitted to the Department for Transport (DfT) for appraisal. Instead a new Local Transport Body (LTB) will receive a funding allocation and would be responsible for determining which schemes are funded. An LTB is proposed to be a formal group of Local Authorities, Transport Authorities, Local Enterprise Partnerships and other organisations based on the Local Enterprise Partnership geographies which will programme and prioritise major transport scheme funding.

2.3 The funding to be devolved is from the next Comprehensive Spending Review period (2015 to 2018-19). It is possible that the devolved funding would continue beyond this period, which is seen as a minimum.

2.4 The level of funding would be formulae based. The government intends to publish indicative budgets for 2015 to 2018-19 in mid-2012. A high level indicative estimate, based on the current national level of major scheme spending, suggests a range of £25-30m for the total period for the Coventry & Warwickshire LEP area.

2.5 Currently DfT funded Major Schemes are defined as those costing more than £5m. The consultation proposes that the £5m threshold is removed, enabling smaller value schemes to be funded.

2.6 Membership of the LTBs is to be locally determined and membership should be led by democratically accountable bodies. The consultation paper clearly sets out that membership should include, as a minimum, the Local Enterprise Partnership (LEP), Local Authorities and Integrated Transport Authority (ITA). The consultation proposes different levels of membership ('full' or 'associate') which would be determined individually by the LTB.

2.7 A number of options are also set out for the role of the LEP in any decision making process. The consultation paper and subsequent clarification makes it clear that Local Authorities are seen as having the primary role in the LTB, and whilst LEPs should not have a lead role, they should have real influence over the process. This is explicitly different to the Growing Places Fund, which is discharged under the sole direction of the LEP.

- 2.8 The consultation is not asking respondents to set out how they would propose to form a Local Transport Body, or its membership at this stage. However, the timetable for implementation means that the Council need to start discussions now with Warwickshire County Council, Centro and Coventry & Warwickshire LEP about the structure of the LTB.
- 2.9 There is an emerging discussion across the Metropolitan area regarding how LTBs will be formed and how, or if, they join across LEP areas in some form of consortia. The consultation document sets out that a consortia of LTBs may enable strategic large schemes with cross boundary benefits to be more easily delivered.
- 2.10 It is likely that some schemes in the Coventry and Warwickshire LEP area which may be suitable for major scheme funding will extend, or have strategic impacts, beyond its boundary (whether on the north-south or east-west transport corridors). However, the majority of schemes are likely to be within the LEP area boundary and many will be highway schemes. This suggests that a collaborative approach between Local Transport Bodies on a scheme by scheme basis would be sufficient to enable the any large strategic schemes to be delivered.
- 2.11 Initial discussions with other West Midlands Districts have indicated that they are likely to take a similar approach.
- 2.12 A coordination body which incorporated the various West Midlands LTBs (and others if appropriate) could be beneficial. This could meet to ensure that information was shared on individual strategic priorities. If appropriate, any cross boundary schemes could be coordinated and their delivery mechanism agreed (for example the highway or transport authority, Highways Agency, Network Rail etc).
- 2.13 In Coventry and Warwickshire the future arrangements will need to address the detail of the Integrated Transport Authority (ITA) engagement and how this would work, given that Warwickshire are not currently part of the ITA. The consultation document is clear that the ITA (Centro) should have an integral role in the LTB and that the ITA should be represented by Councillors of the relevant constituent Districts.
- 2.14 Additionally the consultation is clear that the Local Transport Body should be democratically accountable, but should include representation from the LEP. As the Coventry and Warwickshire LEP is not a democratically accountable body the mechanism for this will also need careful consideration.
- 2.15 The principles of the proposed changes appear to be beneficial to Coventry and should provide opportunities to address historic barriers to funding. The devolved approach would enable local priorities to be better reflected, and would provide an opportunity for the scheme appraisal process to be streamlined and tailored to the scale of scheme.
- 2.16 Specific questions have been asked in the consultation, a number of which also have specific options to respond to. The questions and various options are summarised in **Appendix 1**. The full formal proposed response to the consultation is provided in **Appendix 2**.

3. Results of consultation undertaken

- 3.1 Senior officers, Cabinet Members and the Coventry lead ITA member have commented on this proposed consultation response. However, there has been no specific public consultation in respect of this proposed response.

4. Timetable for implementing this decision

4.1 This specific consultation was published by the Department for Transport on 31 Jan 2012, and a response must be submitted by 02 April 2012.

4.2 The proposed timetable for implementation of devolved funding is:

- 02 April: Deadline for a response to the current consultation
- December 2012: New Local Transport Bodies are expected to submit their proposals for governance, financial management, accountability etc
- April 2013: Local Transport Bodies are to have agreed their prioritised programme of major schemes

5. Comments from Director of Finance and Legal Services

5.1 Financial implications

There are no direct financial implications of the recommendations in the report, however the proposal to devolve funding for major transport scheme to LTB's is likely to result in significant levels if funding for the region. The level of funding that will be generated will depend on national funding levels, the methodology of apportionment and the final make up of the LTB.

5.2 Legal implications

There are no legal implications arising from this report.

6. Other implications

None

6.1 How will this contribute to achievement of the Council's key objectives / corporate priorities (corporate plan/scorecard) / organisational blueprint / Local Area Agreement (or Coventry Sustainable Community Strategy)?

This report deals only with a consultation response and therefore the final outcome of any policy changes are not yet know. However, it is likely that the changes will result in additional transport funding which could be spent on transport projects which have a positive impact on key council objectives and the SCS such as improved prosperity and reductions in CO2 emissions as a result of investment in the transport system.

6.2 How is risk being managed?

There are no specific risks associated with the consultation response

6.3 What is the impact on the organisation?

No impact at this stage.

6.4 Equalities / EIA

An EIA is not required at this stage.

6.5 Implications for (or impact on) the environment

None

6.6 Implications for partner organisations?

Warwickshire County Council, as a joint partner on the Local Enterprise Partnership, will have a key role to play in the new Local transport Body along with the City Council.

Report author(s):

Nigel Mills

Transport Policy Manger

Directorate:

City Services and Development

Tel and email contact:

2169

nigel.mills@coventry.gov.uk

Enquiries should be directed to the above person.

| Contributor/approver name | Title | Directorate or organisation | Date doc sent out | Date response received or approved |
|--|--|------------------------------------|--------------------------|---|
| Contributors: | | | | |
| Mike Waters | Manager Transportation | CSDD | 20/02/12 | 22/02/12 |
| Colin Knight | Assistant Director Planning Transport and Highways | CSDD | 22/02/12 | 23/02/12 |
| Other members | | | | |
| Names of approvers for submission: (officers and members) | | | | |
| Finance: Phil Helm | Finance Manager | Finance & Legal | 22/02/12 | 28 /02/12 |
| Legal: Clarissa Evans | Commercial team Manager | Finance & Legal | 22/02/12 | 22/02/12 |
| Director: Martin Yardley | Director CSDD | CSDD | 23/02/12 | 28/02/12 |
| Members: Councillor Bigham | Cabinet Member City Development | CSDD | 28/02/12 | 28/02/12 |

This report is published on the council's website:

www.coventry.gov.uk/councilmeetings

Table Summary of Consultation Questions, Specific Options and Council Response

Note: This is not the formal response to government and is presented for ease of reference between the proposed Council response to specific questions and options presented in the consultation document. Where some options are selected important caveats and comments are contained in the full consultation response set out in Appendix 2

| | Question | Options | Response |
|----------|--|--|-----------------|
| 1 | <p>There is the possibility that some schemes could be larger than the entire budget for an individual LEP area.</p> <p>The Government has identified 3 options, to help promote strategic investment:</p> <p>Consultation Document Reference: 1.57</p> | <p>Option 1</p> <p>Local transport bodies decide themselves to allocate funding for big schemes. This could be supported by a) a central encouragement to do so, or b) a requirement to do so, potentially in the form of a top-slice as a percentage of local majors allocation. This could be complemented by local transport bodies having the opportunity to identify one or two big schemes to be funded from the 'new' locally created strategic pot. To encourage an entirely bottom-up approach, an overarching committee or body which is locally agreed, would need to decide which of the big schemes get funding. No further funding from the centre would be available as the centre would have already been allocated to individual Local Enterprise Partnership areas. This option, with a central requirement to allocate local funds towards big schemes, would ensure that each Local Enterprise Partnership area has the same opportunity to recommend a big scheme, and guarantees that there is a process for enabling schemes that promote strategic investment. However, not all local transport bodies will have a big scheme and some may perceive that they have lost out if a ring-fence of their allocation was necessary for schemes they have no interest in.</p> | |
| | | <p>Option 2</p> <p>There is a central competition run by the Department for big schemes, and for which the Department retains a top-slice of the total budget. An independent advisory committee could make recommendations to Government on what big schemes should be successful. This would keep open the option of funding big schemes, but would retain a bureaucratic central bidding process while limiting the extent which local transport bodies genuinely prioritise.</p> | |
| | | <p>Option 3</p> <p>There is no separate distinction for big schemes, and no central encouragement or requirement to help promote their delivery. Individual Local Enterprise Partnership areas would get a budget to prioritise whatever schemes were agreed locally. However, the Government would stand ready and willing to help facilitate effective partnership working, where there is a request or concern raised by a local authority or Local Enterprise Partnership. There is a risk with this that some local areas will decide not to deliver a local major scheme, but instead will bring forward very local, small-scale infrastructure. This infrastructure, however, might never have been possible under the previous system and may also be good value for money.</p> <p>GOVERNMENTS PREFERED OPTION</p> | X |


| | Question | Options | Response |
|-----|--|---|----------|
| 2a. | <p>The Government proposes that there are three models for involving Local Enterprise Partnerships in local transport decision-making. Each model differs in the extent of responsibilities the Local Enterprise Partnership assumes and therefore their final accountability for decisions, as follows:</p> <p>Consultation Document Reference: 1.40</p> | <p>Option 1 The Local Enterprise Partnership provides advice to the local transport body on what transport investment would best align with growth priorities. This option would give Local Enterprise Partnerships a clear means of influencing decisions but its advice would be non-binding and the Local Enterprise Partnership would have no formal decision-making role. This would be compatible with an 'associate' member status;</p> | X |
| | | <p>Option 2 The Local Enterprise Partnership is a full member in a local transport body. It would have a say in the decision-making arrangements on an equal footing with other members. It would have joint accountability for decisions, which are made as part of the body – formal accountability for decisions would rest with the body as a whole; and,</p> | |
| | | <p>Option 3 Where legally and financially possible, the Local Enterprise Partnership takes the lead role in the decision-making of local transport body or acts as the transport body itself. It would have the final say in decisions and it would take final responsibility for these decisions.</p> | |

| | Question | Options | Response |
|----|--|---|----------|
| 2b | <p>In terms of a formula for distributing the major scheme funding to LTB's, the Government proposes that the basic premise should be to keep it as simple and equitable as possible. The options include:</p> <p>Consultation Document Reference: 1.67</p> | <p>Option 1 Population (i.e. per capita) allocation, as per the former Regional Funding Allocation.</p> <p style="text-align: center;">GOVERNMENTS PREFERRED OPTION</p> | X |
| | | <p>Option 2 Economic contribution in terms of employed earnings which excludes capital output, or another measure; and,</p> | |
| | | <p>Option 3 A measure of transport need. This could use the integrated transport block or a subset of it, for example the elements on public transport (50%) and congestion (50%).</p> | |

| | Question | Summary of Response |
|---|--|--|
| 3 | <p>Do you have any thoughts or comments on assurance, in particular on whether there are any alternative ways of providing assurance other than putting in place some central criteria for local transport bodies to meet?</p> | <p>The provision of central criteria would seem a reasonable approach to achieve consistent levels of assurance following the devolution of funding. The three recommended principles appear to be a reasonable starting point for this.</p> |

| | Question | Summary of Response |
|---|--|---|
| 4 | Do you have any comments in relation to how local transport bodies should demonstrate that they are accountable to central Government for tax-payers' money and to local communities and citizens? | It is agreed that there is a need for clear accountability. We feel this would best be achieved through locally elected members sitting on a LTB's, |

| | Question | Options | Response |
|----|--|--|----------|
| 5a | There are two options for considering the extent of central assurance that might be needed about which strategic assessment framework(s) to use. Consultation Document Reference: 2.37 | Option 1 Local frameworks to be based on the Department's Transport Business Case guidance, which sets out the current framework for investing in all transport schemes funded by the Department. The Transport Business Case enables considerable flexibility and judgement to be applied by local decision-making frameworks to come forward. This would ensure that there is a consistent quality standard across England which is in line with an established framework and HM Treasury Guidance. GOVERNMENTS PREFERRED OPTION | X |
| | | Option 2 Local transport bodies develop their own frameworks which best fit local circumstances and priorities. However, these frameworks will need to be sufficiently robust and comprehensive to provide the same assurances on aspects included in the Transport Business Case. | |

| | Question | Options | Response |
|----|---|---|---|
| 5b | <p>WebTAG represents a clear and well evidenced appraisal methodology. The Government believes there are three options for providing assurances on the appraisal of individual schemes, and welcomes views.</p> <p>Consultation Document Reference: 2.39</p> | <p>Option 1 The local transport body is required to appraise schemes in line with the Green Book. The Green Book presents the techniques and issues to be considered in appraisal, including social and environmental impacts. Local transport bodies might use the Department's WebTAG guidance as a source-book to make transport schemes Green Book compliant but WebTAG compliance would not be a requirement. This allows the greatest flexibility for local transport bodies to develop their own appraisal frameworks. It would need to demonstrate how users, affected parties and the public would be able to input into decision making, and proper account is taken of these views. If this option were pursued, the Government may have to narrow the scope of WebTAG for local major schemes, which has the following status: "The guidance should be seen as a requirement for all projects or studies that require government approval. For projects/studies that do not require government approval WebTAG should serve as a best practice guide."</p> | |
| | | <p>Option 2 The local transport body is required to appraise schemes using WebTAG. This reduces the amount of flexibility offered to bring forward locally important methodologies, and ensures that the impact of schemes on transport objectives are considered, together with using common values and a well-evidenced standard methodology. This would help benchmark schemes across England and enable them to be compared, which may help any central auditing. For example, the Transport Business Case was updated to ensure that the investment committees have comparable information between schemes. This option does not preclude local transport bodies using other forms of analysis (not part of WebTAG) to inform the assessment and prioritisation of schemes, for example impact on GVA or local employment. GOVERNMENTS PREFERED OPTION</p> |  |
| | | <p>Option 3 Local transport body to appraise only some schemes in line with WebTAG. For example, those which are deemed important and contentious, or, are over a certain threshold, such as £20m. There would be criteria identifying why a scheme is considered important and contentious. This would mean taking a graduated approach to appraisal, reducing the local burden on appraising individual schemes, but ensuring that schemes considered to be impactful undergo a consistent, standard and independent level of appraisal.</p> | |

| | Question | Summary of Response |
|----------|---|--|
| 6 | Do you have any comments on the proposed implementation timetable, and any practical issues raised? | Although challenging, we do not foresee any major problems with the proposed timetable |

| | Question | Summary of Response |
|----------|--|---|
| 7 | Do you have any general comments on proposals to devolve decisions and funding, and on any residual role for the Department? | The proposal to devolve transport major scheme funding is broadly welcomed. The conditions on accountability are supported. |

| | Question | Summary of Response |
|----------|---|----------------------------|
| 8 | Do you have any other comments on any of the other areas covered in the consultation? | No other comments. |

Devolving Local Major Transport Schemes Response Form**Specific questions**

Part 1: Local transport bodies – this section of the consultation document set out the context, rationale and objectives for forming local transport bodies. It also considers the options for distributing funding, facilitating strategic investment and the role of Local Enterprise Partnerships in decision-making.

1. Do you have any comments on the proposed role and membership, preferred scale and geographical scope in forming local transport bodies and consortia, in particular the options to facilitate strategic investment decisions and the types of schemes to be funded?

Response:

Generally we are in agreement with the proposed geographical approach for devolving funding based on LEP geographies. We fully support the proposal that decisions regarding the formation of a Local Transport Body (LTB) are to be taken locally and that the LTB should be properly democratically accountable to the area it serves. The consultation specifically states that it is up to local authorities and LEP's to decide on membership of the local transport body. We support this approach.

We feel that there needs to be a clearer distinction between the role of local transport authorities and ITA's. The consultation states that the inclusion of local transport authorities, and in metropolitan areas the ITA via Councillors of the constituent district members, is essential. The rationale for involvement of the ITA in the LTB is obvious. However, we propose that it be made clearer that Local Authorities and LEP's should have the ability to decide themselves the extent of the role of the ITA in the LTB. This is particularly relevant in areas such as Coventry and Warwickshire, where the Local Transport Body area would cover both metropolitan and county/local transport authority areas. We recognise the importance of the ITA playing a key role in a LTB that has geography within the ITA area of coverage. However, at this stage, before actual proposals for the formation of LTBs have developed or considered properly, the approach should not be prescribed in order to ensure maximum flexibility at a local level. For example, maximum flexibility should be retained to enable an LTB to form consortia at a programme or individual scheme level with other non-metropolitan authorities and local transport authorities, to which ITA membership is not immediately relevant. This point reinforces the need for funding to be channelled directly and administered by a local authority which sits on the LTB and LEP board.

The consultation states that that whilst the LTB should develop a programme of schemes based on local priorities, the programme should also be driven at a scale which is above single Local Enterprise Partnership areas. The opportunity to work collaboratively with surrounding Local Transport Boards/LEP Transport Governance arrangements is welcomed and agreed to be of key importance in going forward. This should be undertaken on areas of mutual interest on a project by project basis. There are a number of priority schemes which will require cross-boundary working, and working with neighbouring areas to deliver the infrastructure needed to support economic growth in the West Midlands and beyond is essential.

Such an approach can be captured in the scheme appraisal framework which the LTB uses to set its programme. However, we note that within the scope of the anticipated funding levels, for many LEP areas, the ability to address immediate major pressing issues which are restricting growth their area LEP, whilst also contributing to cross boundary based programme will be limited. It is likely that a consortia approach will be more valuable on a flexible, individual scheme level basis with the appropriate neighbouring LTBs in response to the evolving priorities of the LTBs.

We do not consider that there is a need for a large major scheme budget to be held centrally and therefore support **option 3** of the options set out to promote strategic investment (ref para 1.57).

We feel that retaining centrally held budgets would:

- a) Defeat the objective of local decision making,
- b) Cause unnecessary additional costs, thus eliminating the efficiency savings identified; and,
- c) Create unnecessary competition between local transport bodies / consortia

*Maximum 400 words

2. Do you have any views on the membership of Local Enterprise Partnerships in local transport bodies, in particular whether they should have the final say in decision-making? Or on any other issues raised in relation to Local Enterprise Partnerships, and potential resourcing impacts?

Response:

We strongly support a central and influential role for LEPs in local transport bodies, recognising the ability which LEP have to direct potential levered funding opportunities and ensure a strong focus on local economic growth. However LEPs are not fully elected, and therefore are not democratically accountable organisations, therefore **option 1** should be the preferred approach. (ref para 1.40)

Distributing major scheme funding on a population basis would appear to be the fairest and most cost effective solution and therefore we support **option 1** (ref para 1.67). This option also would also improve certainty for future funding allocations to assist long term planning, and is already a recognised tried and tested mechanism for distributing funding locally.

*Maximum 400 words

Part 2: This section of the consultation document explained the reasoning for providing assurances on governance, financial propriety and accountability for decisions. It also considered the options for the frameworks to support decision-making, meeting minimum quality standards on appraisal, and delivering value for money. It includes a proposed implementation timetable.

3. Do you have any thoughts or comments on assurance, in particular on whether there are any alternative ways of providing assurance other than putting in place some central criteria for local transport bodies to meet?

Response:

With Ref to Para 2.20, providing central criteria would seem a reasonable approach to achieve consistent levels of assurance and the three principles appear to be a reasonable starting point. Considerable development of this area of the operation of the proposed LTBs is clearly required. We feel that further discussion and appropriate consultation is required before any such criteria are finalised.

*Maximum 400 words

4. Do you have any comments in relation to how local transport bodies should demonstrate that they are accountable to central Government for tax-payers' money and to local communities and citizens?

Response:

Although LEPs must have a clear input to the decision making process, to achieve democratic accountability we feel that only local authorities and local transport authorities who have locally elected

members should form full members of a Local Transport Body in order to receive / manage funding. On a practical note, clearly local authorities already have in place financial accounting / auditing processes which are transparent and accountable to the government and local communities.

Making details of meetings, scheme prioritisation and scheme development/delivery methodologies and costs publicly available would clearly help demonstrate accountability and should be a condition of assurance.

Whilst the government have made it clear that no additional funds will be made available for administration, we would appreciate clarification of whether the major scheme funding allocations could be used to support administration, including the development and prioritisation of schemes.

*Maximum 400 words

5. Do you have any comments on the options for appraising and evaluating schemes, in particular in order to meet and test value for money?

Response:

With reference to Para 2.37, we support the use of existing DfT business case guidance for developing a strategic assessment framework and therefore support **option 1**. Local transport bodies should have flexibility in how these are applied in order to ensure that the level of application is commensurate with the scale of scheme being considered and associated risks. Nevertheless, we consider that the basic principles of the guidance are appropriate and should be retained.

To assess the business cases for individual schemes the principles of WebTAG should be a good starting point, and therefore we support **Option 2** (ref para 2.39). However, we consider that it is critical that there is the ability for local transport bodies to set thresholds to determine the level of assessment required for schemes. With the removal of the £5M threshold, which is welcomed, a smaller scheme, perhaps £1M – £5M should not require the same extent detail in business case as a £30m+ scheme. It will be important that LTB has the ability to set such thresholds and bring in other objectives based on the LEP strategic priorities and economic drivers. These would sit alongside any WebTAG based appraisal in order to ensure that local needs are adequately addressed.

*Maximum 400 words

6. Do you have any comments on the proposed implementation timetable, and any practical issues raised?

Response:

Although challenging, we do not foresee any major problems with the proposed timetable.

LTB's must submit proposals for sign off by Dec 2012. It would be useful to know when LTB's will receive feedback on their initial proposals as this will likely impact on the scheme prioritisation process which LTB's need to submit in April 2013.

*Maximum 400 words

General questions

7. Do you have any general comments on proposals to devolve decisions and funding, and on any residual role for the Department?

Response:

The devolution of major scheme funding is strongly welcomed. It is fully recognised that this must be on the condition that appropriate scheme assessments and accountability are clearly demonstrated. Further discussion and consideration of any potential further implications of the proposed Local Transport Body on the future of other transportation funding would be welcomed.

*Maximum 600 words

8. Do you have any other comments on any of the other areas covered in the consultation?

Response:

No other comments.

*Maximum 400 words