

**MINUTES OF A MEETING OF THE
OVERVIEW AND SCRUTINY MANAGEMENT COMMITTEE
HELD ON 3 SEPTEMBER 2018 FROM 7.00 PM TO 10.15 PM**

Committee Members Present

Councillors: Parry Batth (Chairman), Andy Croy, Lindsay Ferris, Kate Haines, John Jarvis, Ian Pittock, Bill Soane and Shahid Younis

Other Councillors Present

Councillors: Prue Bray, Rachel Burgess, Carl Doran, Anthony Pollock, Helen Power, Malcolm Richards, Imogen Shepherd-DuBey and Rachelle Shepherd-DuBey

Officers Present

Neil Carr, Democratic and Electoral Services Specialist
Matt Gould, Lead Specialist, Highways and Transport
Clare Lawrence, Assistant Director, Place
Andrew Moulton, Assistant Director, Governance and Monitoring Officer
Josie Wragg, Director of Locality and Customer services

31. APOLOGIES

Apologies for absence were submitted from Councillors Guy Grandison, Mike Haines, Philip Houldsworth and Ken Miall.

John Jarvis attended the meeting as a substitute.

Malcolm Richards attended the meeting as a witness in relation to his former role as Executive Member for Highways and Transport.

32. DECLARATIONS OF INTEREST

There were no declarations of interest.

33. PUBLIC QUESTION TIME

There were no public questions.

34. MEMBER QUESTION TIME

In accordance with the agreed procedure the Chairman invited Members to submit questions.

Gary Cowan had asked the Chairman of the Overview and Scrutiny Management Committee the following question:

Question

Can the Chair clarify if a declaration of interest should be declared by any member/s of the Committee who have a crossing under consideration in which the evidence would indicate that a correct safety audit and proper costing was not carried out of which that member was aware?

In Councillor Cowan's absence, the following written reply was provided.

Answer

The Council's Code of Conduct sets out the rules relating to the disclosure of pecuniary and personal interests. The list of subjects requiring declaration include employment, contracts, land, licences, corporate tenancies and securities.

It is unlikely that the work carried out to install pedestrian crossings would require a Member to declare an interest. This position may change if, for example, the crossing was being installed adjacent to a Member's property or he/she had a financial interest (such as shares) in the contractor carrying out the work.

Consequently, I do not believe that Members are required to declare interests in relation to the scenario you raise.

35. CALL-IN OF EXECUTIVE DECISION - SCHOOL CROSSING PATROL SERVICE - CONSULTATION REPORT 2018

The Committee considered the Call-In of the decision taken by the Executive, at its meeting on 26 July 2018, relating to consultation on the proposed replacement of the School Crossing Patrol Service with fixed crossing facilities.

The Executive decision was that:

- 1) WBC continue with its proposal to provide safe, permanent crossings at the seven locations that currently have a school crossing patroller, and, following their installation, remove the school crossing patrol service once the permanent crossings are complete as set out in Option 2, Appendix 1 of the report;
- 2) all affected schools are reminded that they have access to the Council's road safety and My Journey teams who can facilitate further road safety training for pupils if requested.

The decision had been called in by Councillors Prue Bray, Clive Jones, Helen Power, Imogen Shepherd-Dubey and Rachelle Shepherd-Dubey.

The following witnesses were invited to submit evidence and/or answer questions in order to assist the Committee in its deliberations.

- Councillor Imogen Shepherd-Dubey to set out the reasons for the Call-In, supported by Diane Burch, Keith Malvern and Annette Medhurst.
- Councillor Anthony Pollock to provide justification for the Executive decision supported by Councillor Malcolm Richards, Josie Wragg (Director of Locality and Customer Services), Clare Lawrence (Assistant Director, Place) and Matt Gould (Lead Specialist, Highways and Transport).

Councillor Parry Batth (Chairman) welcomed the witnesses and explained the format of the meeting.

Witnesses would be invited to make a short address to the Committee followed by a question and answer session. Following the witness sessions the Committee would consider all the written and oral evidence and either confirm the decision or make appropriate recommendations to the Executive.

Councillor Imogen Shepherd-Dubey addressed the Committee and confirmed that the Executive decision had been called in on the following grounds:

- 1) The decision had contravened Section 1.4.2 a) of the Council's Constitution, in that the action being proposed was not proportionate to the desired outcome.
 - a) A blanket decision had been made to replace all remaining School Crossing Patrols (SCP) with pedestrian crossings, despite the different characteristics and requirements of the locations.
 - b) The desired outcome appeared to be to save money yet the costs both of the crossings and the school crossing patrol had not been fully or correctly stated. None of the other options quoted had any costs provided.
 - c) The decision had been made on the basis of costs for crossings which had not yet been designed – as a redesign was taking place at four sites due to the first design not being suitable; it was therefore unclear whether a crossing was actually the right answer for those locations, as well as the costs being unknown.

- 2) The decision had contravened Section 1.4.2 b) of the Council's Constitution, in that due consultation and the taking of professional advice from Officers had not occurred.
 - a) The consultation was not complete at the point at which the decisions to withdraw the service were made.
 - b) The consultation was not carried out at an early stage, and was not meaningful, and contravened the Council's own rules on consultation.
 - c) There was no consultation with ward Members on the withdrawal of the service.
 - d) The replacement crossings were designed without reference to ward Members and before the consultation was carried out – and ward Members were not even informed until mid-July that the crossings had been designed.
 - e) Wokingham Town Council's consultation response had not been taken into consideration.
 - f) Letters putting the staff at risk of redundancy were issued before the consultation was concluded.
 - g) The Council's responses to the points made by respondents were inadequate.
 - h) At least one crossing was scheduled to be installed before the decision on the outcome of the consultation took place.
 - i) At least one safety audit was done during the school holidays.
 - j) No Equality Impact Assessments accompanied the information in the report.
 - k) It was not clear that all guidelines for the provision of safe crossings had been observed.
 - l) It was not clear that all the evidence comparing the appropriateness of SCP versus crossings has been taken into account.

- 3) The decision had contravened Section 1.4.2 d) of the Council's Constitution, in that openness had not been observed.
 - a) At least one of the crossings was designed in February but this was not communicated to ward Members.
 - b) Some information was shared with individual members of the public but was not made available to all.
 - c) No overall plan for the removal of SCP was made available following the removal of the funding in the 2015 Medium Term Financial Plan.

- 4) The decision had contravened Section 1.4.2 e) of the Council's Constitution, in that clarity of aims and desired outcomes had not been achieved.
 - a) The recommendations referred to a proposal to provide safe, permanent crossings – yet four of the crossing proposals had been rejected in the period shortly before the Executive meeting that made the decision, and therefore the decision had been made before there was certainty that the recommendation could be delivered, or that the costs were as given in the report.
 - b) Due to the failure to present all costs for all options it was not possible for the Executive to have come to a properly informed decision.
 - c) Due to the failure to present the Equality Impact Assessments it was not possible for the Executive to have come to a properly informed decision.

- 5) The decision had contravened Section 1.4.2 f) of the Council's Constitution, in that the details of all the options and reasons for the decision had not been recorded.
 - a) A set of options had been laid out but it excluded the most obvious option of replacing some but not all of the patrollers with crossings.
 - b) There was a presumption that no funding was available for the service to continue, whereas a supplementary estimate could have been used to find the money, but was not considered.

Councillor Imogen Shepherd-Dubey made the following points:

The evidence indicated that the decision to remove the school crossing patrol service was included in the Medium Term Financial Plan (MTFP) 2015/16, agreed at the Council meeting in February 2015. The MTFP contained the line "School Crossing Patrols – investigate alternative sources of funding", but this did not refer to the removal of the service and its replacement with permanent crossings.

Following the removal of the school crossing patroller at Emmbrook Infant and Junior in 2017, there had been a growing number of complaints about inappropriate parking. If the service was to be fully removed the Council must increase its parking enforcement activity in relation to local schools.

The feedback report following the 2018 Consultation exercise stated that the consultation did not raise any issues that were not anticipated. However, the feedback did raise a large number of issues which should be addressed. It also appeared that some consultation responses were not included in the feedback, for example, Wokingham Town Council raised concerns about the Keephatch Road crossing which were not reflected in the Agenda papers.

The Agenda set out the legal principles relating to fair and effective consultation. The Council had not followed these principles in relation to the school crossing patrol decision. For example, the requirement for consultation to take place when proposals were at a "formative" stage and the product of the consultation to be "conscientiously" taken into account in finalising any decisions.

No business case had been produced to support the 2015 decision to remove the service and the financial information included in the Agenda papers appeared to be inconsistent. For example, a special item of £85k was included in the budget for 2016/17 and 2017/18 to cover the costs of the service while the process of removing the patrollers was

completed. However, eight of the patrollers were removed in 2017 which should have resulted in a smaller special item for 2017/18. Similarly, the Agenda papers indicated that the School Crossing Patrol Organiser spent 100% of his/her time managing the service even though the number of patrollers had reduced from 25 to seven.

The Agenda papers included an Equality Impact Assessment (EIA), dated April 2018, which covered all the remaining crossing sites. This EIA was inadequate in that EIAs should be started at the beginning of the design phase and should be updated as the project develops. The April 2018 EIA was also inadequate in that it did not cover the full range of people with protected characteristics who could be affected by the service change. This included disabilities relating to hearing, sight, mobility, learning difficulties and cognitive processing disabilities.

Finally, it was apparent that one of the safety audits had been carried out during the spring half term holiday when there would have been much lower levels of activity outside the school in question.

Members of the Committee raised the following points:

The Job Description for the School Crossing Patrol Organiser (page 131 of the supplementary agenda) indicated that the post holder was responsible for the management of 25 permanent part-time patrollers. It appeared that this information was out of date as there were only seven patrollers remaining. Similarly, the July 2018 Executive report indicated (page 32) that the Organiser post was 0.59 FTE even though there were only 7 patrollers left.

It was clear that the 2015/16 MTFP did not include reference to the replacement of the School Crossing Patrol Service with permanent fixed crossings.

Diane Burch addressed the Committee and made the following points:

Diane was the current School Crossing Patroller at Murray Road. She outlined the work she did to assist children and parents. Diane felt that removing the patroller at Murray Road would increase the risk of accidents. She also gave details of a survey undertaken by local residents which indicated a much higher level of pedestrians and traffic compared to the Council's own survey.

Members of the Committee raised the following points:

The Agenda papers indicated that the school traffic patrollers received letters relating to redundancy before the 2018 consultation exercise was completed. Diane Burch confirmed that she received a letter in February 2018. (It was subsequently confirmed that this letter related to the Council's 21st Century Council change programme and was not part of a redundancy procedure).

The Council's Constitution stated that the Council aimed to consult with residents and stakeholders to ensure that they had a voice. Was the 2018 Consultation exercise seen as "meaningful" by local parents. Diane Burch felt that, based on discussions with parents, the 2018 consultation had the appearance of being a "tick box" exercise.

What level of support did the School Crossing Patrollers received from the SCP Organiser? Diane Burch felt that, as she was an experienced patroller, there was no need

for frequent contact. She felt that her contact with the Organiser amounted to approximately three hours per term with occasional meetings and an annual appraisal.

Keith Malvern addressed the Committee and referred to a written statement from Trevor Sleet which made the following points:

There could only be two reasons for removing the School Crossing Patrol Service and replacing it with permanent crossings – financial and enhanced safety for children. The written evidence from Councillor Keith Baker confirmed that the School Crossing Patroller service was a much lower cost compared to the capital cost of installing pedestrian crossings.

In relation to finance, a patroller was paid around £3k per annum. The cost of installing a crossing was around £40k with annual maintenance costs of £600 and the crossing would need replacing after 15 years.

In relation to safety, a recent report indicated that, on average, there were 20 accidents every day involving pedestrians on crossings. Between 2012 and 2016, Department of Transport statistics indicated that there were 251 fatalities on all types of crossing, but only four on crossings controlled by humans.

In relation to Murray Road, the existing patroller provided a safe crossing for children attending St Paul's, Walter Infant School and Meadow Nursery. There was concern that the Road Safety Audit was carried out on 13 February 2018, during the half term break. The Executive Member had also visited the site. This visit took place on 23 July 2018 when St Paul's and Walter Infants were open, but Meadow Nursery was not and a number of other schools in the area had broken up for the summer.

Members of the Committee raised the following points:

In relation to the Murray Road crossing, did the schools hold after school activities and, if so, was there any impact on road safety. It was confirmed that the majority of after school activities were held at St Paul's and it was felt that a fixed crossing would not have an impact on safety relating to the after-school activities.

Annette Medhurst addressed the Committee and made the following points:

Annette was the Chair of the Management Committee at Meadow Nursery and was able to comment on concerns from staff and parents about road safety. Annette felt that each crossing site should have been assessed on its own merits and that the Council's communication with parents had been disappointing. The Murray Road site was in Emmbrook Ward and two of the Borough Council Members opposed the removal of the patroller service.

Annette believed that the consensus amongst parents and staff at the local schools was that the Murray Road patroller should be retained on the grounds that this was the safest option.

Members of the Committee raised the following points:

Did stakeholders in the Murray Road area feel that the 2018 consultation exercise was meaningful? Annette felt that the consultation was unlikely to deliver a change in the Council's position. Consequently a petition was started.

If local residents felt that the consultation was a tick box exercise, did they contact the Council with their concerns? Annette confirmed that parents had been urged to submit a consultation response but, at the same time, the petition and a letter writing campaign were started. Councillor Imogen Shepherd-Dubey confirmed that she did contact the Council with concerns about the consultation exercise.

Anthony Pollock addressed the Committee and made the following points:

The decisions relating to the School Crossing Patrol Service were taken in line with the requirements set out in the Council's Constitution.

The consultation exercises in 2017 and 2018 had been carried out in line with agreed procedures. The Council had endeavoured to listen to the views of residents. After considering the consultation responses Councillor Pollock had concluded that permanent crossings were safer. This reflected the earlier work overseen by Councillor Pollock as part of the Safer Routes to School programme.

The petition organised by Annette Medhurst had been the subject of detailed discussion and public debate at the July 2018 Borough Council meeting.

Councillor Pollock had visited each of the proposed crossing sites and had been satisfied that drivers acted responsibly.

The views of local ward Members had been sought and their feedback had been incorporated into the design of the new permanent crossings.

Members of the Committee raised the following points:

In relation to the 2018 consultation exercise relating to Murray Road, were any specific representations made from other schools in the area? Councillor Pollock confirmed that no specific representations had been received. He had visited the schools affected by the service change and had concluded that two additional crossings should be installed. The consultation feedback raised similar concerns at each of the sites currently covered by a patroller.

The consultation feedback indicated that 98% of respondents opposed the proposals. What level of opposition would have resulted in a change to the Council's plans? Councillor Pollock confirmed that the consultation was open to residents across the Borough. The consultation feedback did not contain any evidence of significant safety risks which had not already been assessed through site visits and safety audits, etc. Also, evidence from the eight sites where patrollers were removed in 2017 did not indicate a reduction in safety following the changes.

The financial information reported to the Executive on 26 July 2018 indicated that the annual cost of the service was £44,200. This was made up of the cost of the seven patrollers, the part-time School Crossing Patrol Organiser (0.59 FTE) and site risk assessments. As the evidence indicated that the cost of each patroller was around £3k, was the financial information and business case accurate? Also, as there would be a

replacement cost for the new crossings in 15 years' time, should these costs not be included in the business case? Councillor Pollock stated that the financial information also included on-costs for staff. It was also important to note that the decision to change the service had not been made on financial grounds, it was made on safety grounds. It had become increasingly difficult to recruit patrollers whereas the fixed crossings would provide a permanent safe solution.

In relation to the information in the 2015/16 MTFP, as the budget papers were circulated to opposition Members one week before the Budget Council, was this a reasonable amount of time for Members to analyse and research every line in the budget? Councillor Pollock confirmed that, during his time as Executive Member for Finance, he did speak to opposition Members in advance of the budget meeting. In practice, he recognised that analysing the budget papers in a week was challenging.

Matt Gould (Lead Specialist, Highways and Transport) addressed the Committee and made the following points:

The Council agreed to remove funding for the school crossing patrol service at the Budget Council in 2015. Implementation was delayed until 2017 when the eight patrollers already working on fixed crossings were removed. Consultation on the removal of the final seven patrollers took place between January and March 2018. Discussions were held with the patrollers to inform them of the process, but notices of redundancy were not issued at this time.

The consultation feedback did not raise any significant new issues and, as a result, it was agreed that the implementation of the permanent crossings would proceed. It was at this point that the patrollers were given "at risk" letters. Redundancy notices had not yet been issued.

More complex issues had been identified in relation to the Murray Road site and the patroller would remain in place until these issues were addressed satisfactorily.

It was important to note that the school crossing patrol service was discretionary. However, the Council recognised the importance of safer routes to schools and believed that the permanent crossings would deliver a permanent safe solution.

Members of the Committee raised the following points:

The design documents relating to the new crossings indicated that some design work had started before the 2018 consultation had been completed. Matt Gould confirmed that the aim had been to complete the new crossings in the school summer break. In order to achieve this timeline the design work had to proceed whilst the consultation was ongoing. The details of the agreed crossing schemes were not released until after the consultation had concluded and the feedback had been considered.

Once the Call-In procedure had been invoked, was work on the crossings suspended? If work carried on, under what authority did this happen? If work did continue, was there a formal Member or Officer decision to proceed?

Josie Wragg (Director of Locality and Customer Services) confirmed that the Council's Capital Programme provided authority to deliver the permanent crossing facilities. Following discussions between Josie and Councillor Pollock it was agreed that halting the

works would have significant financial risks for the Council. Clare Lawrence (Assistant Director, Place) referred to the supporting papers which stated that there was no Constitutional need for the July Executive to agree to provide the crossings or funding as this decision had already been made.

Andrew Moulton (Monitoring Officer) confirmed that, in principle, implementation of the Executive decision should have been suspended following the Call-In. However, as stated, the Director of Locality and Customer Services also had authority under the Constitution to deliver approved schemes within the Capital Programme. In response to an earlier enquiry, Andrew confirmed that no Individual Executive Member decision had been taken in relation to this issue.

Councillor Malcolm Richards addressed the Committee and made the following points:

Councillor Richards had been appointed as Executive Member for Highways and Transport in 2016, after the decision had been taken to remove the School Crossing Patrol Service as set out in the 2015/16 MTFP.

Councillor Richards carried out research and looked at the approach to this service taken by other local authorities. The service was not statutory and many Councils had taken the decision to remove it. This reflected the fact that it was increasingly difficult to recruit and retain patrollers. Councillor Richards had also examined Department of Transport statistics which indicated that permanent crossing facilities were generally very safe.

In 2017, the eight patrollers operating on existing crossings were removed. Evidence collected following the removal of these patrollers indicated that there was no reduction in safety.

In relation to the remaining seven sites with patrollers, Councillor Richards had examined the safety statistics for each of the sites and held detailed discussions with Officers. He reached the conclusion that the permanent crossings would improve safety and would be in use 24/7.

Members of the Committee raised the following points:

There appeared to be a conflict between Councillor Richard's evidence on national statistics relating to the relative safety of School Crossing Patrol operated sites versus fixed crossing solutions and the earlier evidence submitted by Keith Malvern. Councillor Anthony Pollock confirmed that, whatever the national statistics indicated, there was strong evidence that fixed crossings in the Wokingham Borough were very safe.

In addition to the evidence submitted to the Committee, there was anecdotal evidence that the School Crossing Patrollers were highly valued by local communities. It was difficult to translate this added value in financial terms.

Councillor Parry Batth explained that a plenary session would take place enabling the witnesses to clarify any points following the submissions and points raised by the Committee. The following points were raised:

Councillor Pittock sought clarification on the correspondence sent to the School Crossing patrollers during the 2018 consultation period. Matt Gould confirmed that the patrollers had

received a letter relating to the Council's 21st Century change programme in February 2018. This was not an "at risk" or "notice of redundancy" letter relating to the service changes being consulted on.

Annette Medhurst asked about the requirement for the consultation exercise to take place. Matt Gould confirmed that the consultation had taken place in line with the requirements of the Council's Constitution.

Councillor Croy referred to the legal principles relating to fair consultation and asked if the Council had followed these principles correctly. Also, was the political process – lobbying, petitioning, etc., more effective than the consultation process? Councillor Pollock stated that the Council had tried to act in a fair manner and listen to the views of residents. It had carried out detailed assessments and safety audits. The aim was to deliver a solution which was as safe, if not more safe, than the existing arrangements.

Councillor Imogen Shepherd-Dubey addressed the Committee and made concluding remarks.

Councillor Shepherd-Dubey stated that the Call-In was not about the outcome relating to the service, it was about the decision making process and the importance of following the correct legal principles. The 2015/16 MTFP did not contain a specific decision about the replacement of patrollers with fixed crossings and the subsequent consultation process was flawed. The financial information supporting the proposals did not add up and the 2018 Equality Impact Assessment was inadequate and did not meet the Council's statutory requirements.

Councillor Anthony Pollock addressed the Committee and made concluding remarks.

Councillor Pollock stated the decision making process had not breached the Council's Constitution. The process had been fair and sought to build on the safety improvements delivered earlier through the Safer Routes to School programme. The detailed safety audits had demonstrated that the proposals were safe and feedback from residents and Members had strengthened the outcome. The specific issues relating to Murray Road would be addressed before the final scheme was implemented.

The Committee discussed the written and oral evidence and considered its decision.

Councillor Parry Bath outlined the options open to the Committee, viz:

- a) to confirm the 26 July Executive decision;
- b) to request that the Executive review the 26 July decision and provide reasons to support the request;
- c) to confirm the 26 July Executive decision and provide advice to the Executive via a letter from the Chairman to the Leader of the Council.

Councillor Lindsay Ferris referred to Paragraph 6.3.12 of the Council's Constitution which referred to use of a "party whip" in Overview and Scrutiny deliberations (i.e.

predetermination on political lines) and requested Members to notify the Committee if a party whip was in place. Members confirmed that no party whip was in place.

Councillor Lindsay Ferris stated that the decision making process had been flawed and the decision should be referred back to the Executive in relation to three issues: inadequate consultation, inaccurate financial information and incomplete Equality Impact Assessments.

Councillor Andy Croy stated that the decision should be referred back to the Executive in relation to predetermination and flawed/ineffective consultation.

Councillor Ian Pittock stated that the decision should be referred back to the Executive in relation to the inadequate business plan, predetermination in advance of consultation and inadequate Equality Impact Assessments. Councillor Pittock also noted the wider issues relating to Budget Scrutiny by the Overview and Scrutiny Committees.

Councillor Shahid Younis noted the concerns raised about the decision making process but felt that the Executive decision should be confirmed with advice to the Executive in relation to clarity about consultation and the need to look at each site on its individual merits.

Councillor Bill Soane noted that the Executive decision was focussed on improving safety and not on financial savings. He also agreed that each site should be assessed to understand the local situation.

Councillor John Jarvis agreed that there were concerns about the process but felt that the evidence showed that the Executive did listen to the views of residents.

Councillor Kate Haines noted that the decision making process had not been followed correctly and felt that the Executive should be informed of the Committee's findings.

It was proposed by Councillor Andy Croy and seconded by Councillor Ian Pittock that:

- 1) the Executive be requested to review their 26 July 2018 decision on the School Crossing Patrol Service in light of the evidence presented to the Overview and Scrutiny Management Committee;
- 2) the request to the Executive for a review is based on the following reasons:
 - a) the original 2015 decision to remove the School Crossing Patrol Service was taken prior to the consultation, and, with the substantive decision having been taken, subsequent consultation exercises were not seen as meaningful;
 - b) the original 2015 decision was taken without an underpinning business case and the 26 July 2018 Executive report did not contain detailed information showing the current costs of the service and the full financial implications relating to the proposed implementation, maintenance and future replacement of the new permanent crossing facilities;
 - c) the original 2015 decision was taken without an underpinning Equality Impact Assessment (EIA) and the subsequent April 2018 EIA did not contain detailed

information about consultation with specific groups and did not reflect the individual circumstances relating to each of the proposed crossing sites.

On being put to the vote the proposal was **agreed**.

RESOLVED That:

- 1) the Executive be requested to review their 26 July 2018 decision on the School Crossing Patrol Service in light of the evidence presented to the Overview and Scrutiny Management Committee;
- 2) the request to the Executive for a review is based on the following reasons:
 - a) the original 2015 decision to remove the School Crossing Patrol Service was taken prior to the consultation, and, with the substantive decision having been taken, subsequent consultation exercises were not seen as meaningful;
 - b) the original 2015 decision was taken without an underpinning business case and the 26 July 2018 Executive report did not contain detailed information showing the current costs of the service and the full financial implications relating to the proposed implementation, maintenance and future replacement of the new permanent crossing facilities;
 - c) the original 2015 decision was taken without an underpinning Equality Impact Assessment (EIA) and the subsequent April 2018 EIA did not contain detailed information about consultation with specific groups and did not reflect the individual circumstances relating to each of the proposed crossing sites.