

Transport Action Network

Response to:

England's Economic Heartland

Consultation on Scoping of Integrated Sustainability Appraisal

Response to Scoping Consultation

While this consultation is welcome, we have some serious concerns about the quality of the data and assessments proposed to be used within the Integrated Sustainability Appraisal (ISA). As it stands the ISA is not robust, is out of date on a number of issues, and will not aid the decision making process in the way that it should. This needs to be resolved before it is used in the development of the draft Transport Strategy.

Our detailed comments are addressed under the relevant section headings and next to the relevant paragraph numbers within the ISA, as follows:

Health

5.4.11 *“Effective transport planning can play a role in encouraging active transport choices (e.g. walking and cycling) as well as improve accessibility to sports and recreation facilities. Continued traffic growth without adequate provision for pedestrian and cyclists’ facilities is unsustainable.”*

There are two issues with this statement:

1. Active travel is not a side or recreation issue – it can enable access to jobs and services which otherwise might be out of reach to deprived communities because of

the cost of transport. Additionally, the advent in e-bikes makes commuting longer distances by bike perfectly feasible now, significantly expanding the role this form of transport could play in accessing all manner of jobs and services. This expanded role needs to be acknowledged here.

2. Continued traffic growth is unsustainable and this sentence needs removing or rewording. The Committee on Climate Change has highlighted the need for a 10% modal switch from private cars to walking, cycling and public transport¹ in its net-zero scenario. However, this was a conservative figure and likely to be an underestimate of the level of action required. For example, other research by Transport for Quality for life, commissioned by Friends of the Earth, suggests that even with a ban on sales of new conventional vehicles by 2030, levels of traffic reduction of 20 – 60% will be needed by then, depending on how fast action is taken to decarbonise in other areas².

Community Safety

5.5.2 This section uses the discontinued term ‘accidents’ to depict ‘crashes’. The use of the term ‘accidents’ is a misnomer as many crashes are avoidable and therefore cannot be accidental. Using this wording undermines the seriousness of the issue and deflects responsibility from those who cause crashes by their increased risk taking and the measures needed to address this.

Natural capital and ecosystem services

5.7.4 It would appear rather perverse to use the cost of fuel as an economic benefit derived from people visiting the countryside. The number of cars accessing rural areas creates significant pressures on country lanes, roadside verges and increases demand for car parking in sensitive landscapes. It results in a multitude of other disbenefits including making it less attractive and safe to cycle or walk in the countryside, increasing noise and air pollution and undermining public transport services both directly and indirectly. The cost of fuel should be seen as a negative cost, not a positive, scaled up to represent the true impact on society.

5.7.14 Connectivity needs to apply to people as well as nature. Often people’s connectivity is significantly reduced or inconvenienced by new transport infrastructure, particularly new roads. Footpaths and bridleways and even minor roads, can be sent on long diversions to find a single crossing point, provided for several routes. These diversions are often less than pleasant being close to the busy (and hence noisy) new roads. This is often deemed acceptable by decision makers as the number of people using these routes can be relatively low in comparison to the numbers on the new roads. However, the long term and cumulative impact is to create a countryside that becomes more and more fragmented for

¹ Page 240, [Net Zero The UK’s contribution to stopping global warming](#)

² [More than Electric Cars](#), February 2019

people, further undermining its attractiveness and the recreational opportunities it provides. These negative impacts should be reflected here given the large number of new roads being suggested by the draft Transport Strategy.

Landscape, townscape and visual amenity

5.8.13 This section should reference the issue raised above about deteriorating accessibility in the countryside for people particularly where there is new road infrastructure which breaks or sends walking, cycling and horse-riding routes on long diversions. This reduces the likelihood of local people using non-car modes as well as reducing recreational and tourism opportunities.

5.8.14 While the opportunities listed identify improving access to the countryside as important and having potential, this should be clarified to mean by active travel and public transport, not by any means, given the huge negatives that arise from excessive car access.

Air Quality

5.11.13 While it is correct that there are likely to be more cars with a greater population if no action is taken to reduce road traffic, it should not be just taken as a given, especially as there needs to be a cut in traffic levels if the net-zero carbon target by 2050 is to be met. The ISA should be highlighting that without traffic reduction it is very unlikely the UK will meet its net-zero carbon target and hence should be discouraging any action that results in traffic growth, rather than just commenting that more people will mean more cars.

5.11.14 This section completely fails to mention the opportunities that arise from traffic reduction, such as reduced air pollution.

Climate Change

5.12.5 This section seems inexplicably out of date, given the Court of Appeal judgement on Heathrow is referenced in paragraph 5.11.8 (under air quality). Yet no mention of it is made here and its implications for future decision making, particularly with regards to climate and the legally binding target of net-zero carbon by 2050. The old 80% target is still quoted as the legal target for carbon, even though that is no longer the case and hasn't been since June 2019. This appears rather odd given that these have serious implications for carbon emissions and the sort of strategy that will be required to help deliver the new target.

5.12.9 No mention is made of need to reduce traffic in order to meet the net-zero carbon target by 2050. This is an important issue and opportunity.

In addition, as we have signed up to Paris, it is not so much a question of “the amount of greenhouse gases the population chooses to emit” as stated here, but the levels we can afford to emit to stay within the UK’s carbon budget and its international commitments. While the lack of a baseline for regional carbon issues might be an issue, there are some tools to estimate this, and this ISA should be using them to indicate progress on carbon

reduction. To this end it needs to provide much better indications of the true impacts that large infrastructure projects, particularly new roads, will have on the region's carbon budget.

There is no mention of the need to consider wider carbon emissions resulting from certain transport interventions – e.g. low density car based sprawl, linked to new roads, can increase emissions significantly and illustrate how the carbon impacts of a new road extend far beyond the road itself.

5.12.10 The opportunities listed are very weak and other than adaptation, there is only mention of infrastructure for electric cars. There is no mention of the co-benefits arising from promoting more active travel or example (to tackle climate change) such as a fitter and happier population, placing less demands on the NHS, enhanced economic productivity, less absenteeism, etc. No mention of creating more attractive places to live with higher quality, more dense development based on public transport infrastructure and hence less countryside wasted storing private cars.

Soil, Land use, Resource and Waste

5.13.9 There is no mention of new development needing to make more efficient use of land – fewer, smaller roads, higher density developments on the back of high quality mass transit would minimise land use, loss of agricultural land and climate emissions. While it could be said to be covered by the term resource efficiency, that term is too vague or broad and development impacts are rarely considered under this heading. Tackling climate change and the style of development could present a big opportunity to safeguarding the countryside and should be explicitly mentioned.

Noise

5.14.7 Yet again there is no mention of the opportunities that traffic reduction alongside more active travel and public transport use would bring, this time in terms of reduced noise pollution.

Sustainability Appraisal Framework

Population and equalities – the wording in this section is too vague and fails to highlight the current discrimination against those with age and poverty characteristics. These groups are currently often prevented from driving or cannot afford to drive (or perhaps don't want to drive) yet are given few other options in both urban and rural areas, although rural isolation is often greater.

Health – the current sustainability objective is weak, particularly: *better access to public transport and supporting active travel*. Better access is no good if public transport isn't improved, while supporting active travel is meaningless without significant prioritisation of investment into infrastructure to make this happen. It should something like: *through*

better access to high quality, frequent public transport and high quality active travel provision...

Community Safety – It is wrong to talk of accidents, not crashes as this gives a sense that road users are not responsible for their and others' safety. While it covers safety at a high level, it really needs to specifically address the issues of vulnerable road users and road danger (perceived or otherwise) which denies so many of a choice of transport, or any transport at all. This aspect should be a major focus of this objective as otherwise significant community safety issues will not be addressed which will prevent the shift to active transport that is needed for both health and climate change reasons.

Landscape and townscape – There is no mention of the severance caused by infrastructure, particularly new roads. It is a serious issue and should be part of the sustainability objective. The following could be appended to the current objective: *and the rural connectivity for people walking, cycling and riding horses.*

Climate Change – There is no mention of the need to follow a pathway to the net-zero 2050 target within the sustainability objective. As assessed here, the strategy could reduce emissions and meet its objective by 2050 but completely fail to keep within carbon budget, which would mean it had failed in its obligations under the Paris Agreement.

The third bullet under issues identified should state 'charging and electrical' or just 'electrical' infrastructure, so it's not mistaken to include new roads. There should be other issues listed here as well:

- including the need for modal shift and traffic reduction if the UK is going to keep within its carbon budget.
- the fact that building more roads will increase traffic and emissions thus taking us in the wrong direction, compromising our ability to meet our carbon target, or forcing other sectors to take even faster and more severe cuts which they may not be able to deliver.

Next Steps

From table 7.1, we are concerned that the consultation period looks like it might be only 4 or 6 weeks long. For such an important strategy document as this and particularly as the consultation period extends over the summer holidays, it should be a minimum of 12 weeks. Given that the consultation won't end until mid-October, producing the final ISA, alongside the final transport strategy isn't credible in October and probably not even in November, if responses to the consultation are to be properly considered.

Separately, we have been assured that the consultation on the draft Transport Strategy will be a minimum of 12 weeks, starting 14 July. Given that there may continue to be great uncertainty around travel and meeting restrictions at that time which could hinder community organisations getting together, that either the consultation is extended beyond

12 weeks, or it is launched at a later date. Even if things are starting to return to normal by July, people may well be still getting over a lot of upheaval and even loss at this point. Equally restrictions could be extended and the current crisis on-going.

Appendix C

Population and Equalities

Under this section there is no mention of active travel which is important for age and for those in poverty. The emphasis on the sole reliance on public transport is wrong. From DfT Action Plan (2012) and Hallam Uni research (2017) there is no mention of active travel, cycling in particular, which is potentially even more appropriate as it is free to use – people just need access to a bike and lock. NPPF talks of prioritising walking and cycling, but this is not explained here. Research by Campaign for Better Transport³ on the impact of the Local Sustainable Transport Fund highlights it's more than just buses.

Air Quality, Climate Change and Greenhouse Gases

Surprisingly this section doesn't mention the latest legal target for carbon – net-zero by 2050, despite having mentioned the Heathrow Court of Appeal Judgement earlier in the document. This section needs updating and the whole ISA revisiting to address the implications of a more stretching target and the need to follow a pathway to net-zero with interim targets.

Given the ISA has quoted the Heathrow judgement and that the implications of that judgement could have far reaching consequences for other National Policy Statements (NPS), it is surprising that the ISA quotes the National Networks NPS (NNNPS) which states that: *“it is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets.”* Given the NNNPS was published in 2014 before Paris and the net-zero 2050 target, it is clearly out of date. Also, given that transport emissions are heading in the wrong direction and are a significant and rising proportion of total emissions, it is highly unlikely that the assumption within the NNNPS is correct.

This section also fails to mention the Committee on Climate Change's 2019 progress report which says that the Government has delivered just 1 policy action out of 25 recommended by the Committee in 2018 and surface transport emissions have risen over the past 5 years⁴.

³ [Improving local transport helps the economy – experience from the Local Sustainable Transport Fund](#), Campaign for Better Transport

⁴ <https://www.theccc.org.uk/wp-content/uploads/2019/07/2019-Progress-Report-Summary.pdf> and Table 4.2, page 85 <https://www.theccc.org.uk/publication/reducing-uk-emissions-2019-progress-report-to-parliament/>

23 March 2020

Chris Todd

Director

Transport Action Network

Transport Action Network provides free support to people and groups pressing for more sustainable transport in their area and opposing cuts to bus services, damaging road schemes and large unsustainable developments

139 Hollingdean Terrace, Brighton BN1 7HF

Not-for-profit company limited by guarantee, registered in England and Wales: 12100114