

Transport Action Network

Response to:

**Decarbonising Transport:
Setting the Challenge**

Responses to Consultation Questions

Our responses to the questions listed in the consultation questionnaire are listed below:

Share your views

What do you think government should be doing to reduce the greenhouse gases that are produced from:

1. **Cars and small vans?** The Government should be pursuing traffic reduction of at least 20% by:
 - a. reducing the need to travel:
 - i. through better consideration and prioritisation of transport in the planning system. This will require a review of the National Planning Policy Framework (NPPF) and stronger guidance from Government.
 - ii. by changing the approach of large service provider organisations, such as the NHS or law courts, where centralisation can impact on people's ability to easily engage with these services or to travel via sustainable modes to them.
 - b. encouraging a faster move away from car use to sustainable modes, including cargo bikes.
 - c. switching the remaining demand for cars and small vans to electric vehicles enabled by a rapid roll out of charging points.
2. **Buses and coaches?** Increase incentives to electrify or switch to other fuels such as hydrogen, particularly as many fleet investment (electrification) programmes are likely to have stalled since COVID with the loss of passengers and revenue.
3. **Larger vans and lorries?**
 - a. These should be electrified where feasible or alternatives such as hydrogen explored.
 - b. Reduce the use of larger vans and lorries by switching more freight to rail and water (see comments under freight below)
4. **Passenger rail?** Speed up electrification to create more continuity in electrified lines and rid the network of expensive and heavy (damaging and less efficient) bi-modal trains.
5. **Aviation?** Introduce a frequent flier levy to manage demand and to create an income stream to invest in longer distance train services to provide a better alternative to domestic and near European destinations. Given that 70% of all flights

are undertaken by just 15% of the population, with 57% of the population taking no flights at all¹, this would be an equitable way of tackling the problem of managing demand.

The levy could be structured in such a way that the first flight had a nominal charge but subsequent flights increasingly ramped up the cost to discourage excessive flying. Otherwise, the large number of people who don't fly risk being penalised by the failure of the aviation sector to get its emissions under control and surface transport having to make even bigger cuts to compensate, in order for net-zero to be achieved. This would be totally unfair and inequitable.

6. **Freight?** Maximise the shift from road to rail and water through charging road freight the true cost of its wider impacts on society such as the higher maintenance costs road haulage imposes on highways authorities. For example, a standard six-axle 16.5 metre 44 tonne truck is 138,000 times more damaging to a road than a Ford Focus.

Moving to a distance-based charging system for HGVs would improve efficiency and lower empty running as seen in Germany, Switzerland and Austria². Set at the right level it would reduce lorry miles, reduce road maintenance costs and help reduce carbon emissions. With HGVs paying a more realistic amount towards the costs they impose on society, it would help rail, and possibly water, to become more economically competitive, achieving a further reduction in HGV mileage and bigger carbon savings.

Local journeys

What, if any, changes to reduce the greenhouse gases produced by your local transport, would you like to see made?

1. Create better pedestrian facilities and public realm to make walking more attractive and easier. COVID has highlighted how little space pedestrians are often given compared to the overall road space available. Even then that space can be littered with bins, A-boards, signage, parked cars, etc and not that pleasant or easy to use.
2. Build safe and convenient cycle networks to enable more people to cycle, many of whom currently don't as they feel intimidated by traffic on the roads. In this regard we strongly welcome the new Cycling and Walking Investment Strategy and design guidance Local Transport Note 1/20.

The networks need to be concentrated in urban areas (big and small) but also need to extend out in to rural hinterlands to connect with communities there, as is done in

¹ [Do 15% of people take 70% of flights?](#) – Full Fact, November 2016

² [Response to consultation on Reforming the HGV road user levy](#) – Campaign for Better Transport, January 2018

Denmark³. This would provide a two-way benefit: reducing car traffic into congested towns while also providing sustainable access to and from the countryside helping to reduce traffic on rural lanes and car ownership in towns where road space is at a premium.

3. Create large and secure covered cycle parking, with CCTV coverage, in areas such as city centres, large workplaces, and rail and bus stations. Ensure that elsewhere there is a good spread of high-quality cycle parking at destinations such as supermarkets, local shops, doctors' surgeries, gyms, etc. Proper standards need to be set out in terms of design and layout as much current provision is of poor quality and insecure.
4. Establish an e-bike subsidy programme to promote e-bikes as a cheaper and more efficient way of reducing traffic than switching people to electric cars. E-bikes don't cause the congestion that cars do, use less resources, including placing less demand on the electricity supply (which is costly to upgrade), while also keeping people, particularly older people, active. They significantly increase the viability of journeys up to 10 miles by bike and help 'flatten' hills, making cycling a realistic option for many more people.
5. Promote the sharing economy and Mobility As A Service, so that ownership is not a hindrance to being able to get around. Avoiding private car ownership helps reduce vehicle miles driven and allows a choice of transport modes to be selected depending on the type and purpose of the journey. Reduced car ownership also has other benefits such as freeing up space previously required for parking, helping provide more room for sustainable transport and more sociable and attractive streets.
6. Install more bus priority measures and improve bus stop environments alongside commissioning more zero-emission bus fleets to improve the efficiency, reliability and attractiveness of buses. Currently many bus services suffer from getting caught up in congestion which has significantly increased their costs, as more buses have to be put on a route to maintain service frequency. Getting buses through or around this congestion will reduce bus operator costs and carbon emissions and by offering a more attractive service attract more people out of their cars, reducing emissions further still.
7. Act to bring down prices to make the bus more competitive with the car and enable a faster modal shift and carbon reduction. Bus and coach fares have risen around 59% over the past ten years while earnings have only risen by 24%⁴. Motoring costs in comparison have remained broadly in line with wages⁵.
8. Reinstate bus services in rural areas, with minimum service levels for differently sized populations feeding into express bus and rail services so that people in rural areas

³ [Cycle Superhighways](#) – Capital Region of Denmark, 2019

⁴ [Bus fares have risen faster than wages since 2010](#) – Full Fact, March 2020

⁵ [Cost of motoring index](#) – RAC Foundation

are still able to live without a car and are not discriminated against. A report by Professor John Whitelegg on rural bus services in Shropshire provides an indication what might be achieved in this country⁶.

9. Minimise car use in towns and cities through the above measures as well as introducing low traffic neighbourhoods and other demand management measures.
10. Stop approving car-based developments⁷. The NPPF⁸ has some good statements on sustainable transport but it is still undermined by paragraph 109 which limits refusal of an application to highway safety and congestion concerns, not on failure to provide safe, convenient and attractive sustainable transport.

What, if any, examples of good transport initiatives in your local area do you have (with a particular focus on low or zero emission initiatives)?

There are examples of good practice across the country from London for cycling, Brighton, Nottingham, Oxford and Reading for buses and Poundbury for planning new settlements. Cornwall has also led the way on reimagining public transport and better integration between buses and trains with its [One Public Transport System](#).

Longer journeys

What changes would you like to see that will help to reduce the greenhouse gases produced from longer journeys?

1. Create an integrated public transport network with feeder bus services connecting with rail and with proper rural coverage so that people in both urban and rural areas are able to live without a car and take low-carbon solutions for long distance journeys. (See comments under point 7 above).
2. Linked to the above, would be the establishment of mobility hubs, offering a range of travel solutions to people's final destination. These centres could also link with co-working office space and other services for people who don't want to, or can't work at home, but equally don't want a long commute into a central office.
3. Electrify the railways as these are more efficient at transporting people over longer distances with less impact.
4. Improve the capacity and choice of rail services, including reintroducing sleeper services to make it more viable to travel longer distances by train rather than going by air. This will be essential as a third of carbon emissions come from journeys over 25 miles and it's unlikely that a significant reduction in vehicle miles can be achieved

⁶ [Shropshire Rural Buses](#) – Foundation for Integrated Transport, January 2018

⁷ [Transport for New Homes](#) – Transport for New Homes, 2018

⁸ [National Planning Policy Framework](#), July 2019

from shorter journeys unless a substantial focus is placed on promoting e-bikes. Even then some reduction from longer journeys is likely to be required.

5. More affordable and fully integrated (bus & train) fares, see issues listed above to make them more competitive with road and air.
6. Road traffic reduction through demand management measures, including through road pricing, which will be needed at some point to replace Fuel Duty. This could then be used to fund greater investment in public transport and active travel.
7. Encourage uptake of electric and other zero-emission vehicles by installing more charging points.
8. Move freight off road and onto rail and water through a combination of pricing signals and increasing capacity of rail and water solutions. (See previous comments on freight).

Purchasing goods

What action do you think government should take to reduce the greenhouse gases produced from the:

Distribution of goods across the country?

1. Move freight off road and onto rail and water through a combination of pricing signals and increasing capacity of rail and water solutions. (See previous comments on freight).
2. Encourage uptake of local goods and services – strengthening the local economy and minimising food miles and carbon emissions. An element of this has been seen since COVID with city centres fairly deserted, but local centres much busier than previously as people working from home have tended to shop and access services locally.

Delivery of goods to shops or residences?

1. Ban / repurpose out of town retail sheds which encourage car use as they are mostly located in inaccessible places for people walking and cycling and often poorly served by public transport.
2. Ban / reduce HGV access to urban centres and encourage more electric vehicle and cargo bike deliveries.

Travel choices

Do you find it:

easy to make informed travel choices in relation to the emissions produced?

difficult to make informed travel choices in relation to the emissions produced?

We suspect most people find it difficult to make informed travel choices based on carbon emissions because the information is either not available, not promoted, or is difficult to present in an accurate way.

Information to inform travel choices

What information would you find helpful in making those choices?

The approximate measurement of greenhouse gases emitted as a result of your journey – Yes, as a total and as a percentage of a person’s nominal annual carbon budget. The latter would be most helpful where flying was an option but would probably be less relevant for other journeys.

A comparison of the greenhouse gases emitted as a result of your journey relative to other forms of transport – Yes, this helps to highlight better choices in a way a total cannot.

A comparison of the greenhouse gases emitted as a result of your journey relative to other lifestyle choices – While this might have some general interest, we’re not sure how helpful this will be in helping people choose a more sustainable mode of transport.

Other – There are two other factors which could help inform journey choices and that is air pollution generated by the transport choice and the level of physical activity it will encourage. Air pollution should be shown for all journeys as electric vehicles create particulate pollution from tyres and brakes and could help encourage more people to shift from cars to more sustainable modes.

For shorter journeys and particularly if using Mobility As A Service apps, it would be beneficial to show an activity index alongside journey choices to show how much of a person’s physical activity requirements the journey fulfils.

Indeed, for shorter journeys, absolute totals might be rather meaningless and a traffic light system might work better for carbon, air pollution and activity levels.

Final comments

Government should take clear leadership

1. It should set mandatory carbon budgets for transport (separate for both surface transport and aviation) with a clear pathway to net zero at both a national and regional level. Without clear targets, it won’t be possible to properly hold people or institutions to account and to monitor progress. Local highways authorities through their membership of the sub-national transport bodies could then agree amongst themselves what their respective local transport carbon budgets would be. This would help give them ownership of the figures while also giving them something tangible to aim for, which is missing at present.

It's reassuring to see that some transport authorities are taking a lead on this such as West Yorkshire Combined Authority and Transport for the West Midlands with modelling showing that to achieve net-zero carbon, significant modal shift and a reduction in private car miles will be needed. However, only one sub-national transport body, Transport for the North has an adopted carbon reduction pathway and that's why national leadership is required.

2. Set a road traffic reduction target nationally to give a clear steer that more than technical solutions are required. Research from Transport for Quality of Life and others has shown that electrification of the vehicle fleet is not enough for us to achieve net-zero carbon by 2050, even if the date for banning the sale of cars with internal combustion engines is brought forward to 2032 or even 2030. A vehicle mileage reduction of 20% is needed at a minimum and possibly up to 60%⁹. Therefore, having a top-level traffic reduction target would help focus minds, shape policy, including planning, and help drive down the need to travel, increase the switch to sustainable modes and reduce car use. Without it, there will be a feeling by many that technology will fix the problem and that will undermine efforts for achieving modal shift and reducing carbon emissions.
3. Create an affordable, clean and fully integrated sustainable transport network, including for rural areas, funded by road pricing. At present there is a real dearth of choice of transport for many people, whether it be access to the rail network, local bus services or safe roads to walk or cycle. This leaves many people driving who don't necessarily want to, or it leaves people in transport deserts¹⁰ where they are unable to access wider goods and services, family and friends and therefore are left behind and feel isolated. There needs to be a comprehensive rethink about how public transport is planned. In addition, sub-national transport bodies need to play a greater role in how public transport works in their regions to bring bus, rail and other transport modes closer together to enable fully integrated services which are not only cheaper but more reliable. This could be paid for through road pricing.
4. Create a fair and just transport system that doesn't leave people behind and improves public health and wellbeing. As stated already, many people are left behind without a genuine choice of transport if they don't own a car or cannot drive for being too young or too old. This is discrimination and the decarbonisation of the transport system offers a real opportunity to address this.
5. Increase faster broadband rollout, increasing speeds and capacity. This is an essential part of demand management as it allows more efficient remote working and information sharing, thereby reducing the need to travel, potentially long distances. While this could have some short term economic impacts as offices become

⁹ [More than electric cars](#) – Friends of the Earth / Transport for Quality of Life, February 2019

¹⁰ [Transport Deserts: The absence of transport choice for England's small towns](#) – CPRE, February 2020

redundant and there are less people commuting to city centres, it will enable businesses to become more efficient, lowering costs, while city centres will be able to convert some offices to housing and regenerate themselves with a more permanent population than perhaps they currently have.

Stop making things worse

6. Repurpose money for roads from RIS2 and other funding streams into positive solutions that will reduce emissions. The £27 billion strategic roads programme plus all the other spending on roads is going to significantly increase carbon emissions at a time when we need to be dramatically reducing them. The next 5 – 10 years are critical as without significant reductions by then we will most likely have exhausted the carbon budget for transport. The current suggestion by the Department for Transport that the second Roads Investment Strategy will only result in an additional 0.27Mt CO₂ up until the end of 2032¹¹ is not credible when it does not match scheme figures released by Highways England or include construction emissions. Investing in high carbon infrastructure will undermine the UK's decarbonisation plans as highlighted by the Committee on Climate Change in its latest progress report to Parliament¹². The funding for capital expenditure should be switched to ramping up sustainable transport both in its own right and linked to new developments which rarely have funding for decent active travel and public transport infrastructure¹³.
7. Fully integrate sustainable transport into planning and stop enabling car dependent developments. The NPPF needs revising to remove or amend paragraph 109 that makes it harder for planning authorities to refuse permission for new development without adequate sustainable transport provision (which is most developments). The Planning Inspectorate also needs to be advised about the fundamental importance of transport in site allocation and scheme determination and not treat it as some kind of minor consideration, or afterthought, as seems to be too often the case.

¹¹ [Answer to written question submitted by Caroline Lucas MP](#) on 14 July 2020

¹² [Reducing UK emissions: 2020 Progress Report to Parliament](#) – Committee on Climate Change, June 2020

¹³ [Garden Villages and Garden Towns: Visions and Reality](#) – Transport for New Homes, 2020

27 August 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

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