

# **Transport Action Network**

*Response to:*

**England's Economic Heartland's**

**Draft Transport Strategy Consultation**

## Headline comments:

- Broadly support the vision but feel it should focus on sustainable development rather than growth which implies there are no environmental limits. It also suggests that a world-class, decarbonised transport system can only be delivered by technology. Technology may play a strong role in this but critically any system needs to be fair (affordable and accessible) and to give people meaningful choice.
- Support the key principles, although the ambition to have net-zero carbon emissions from transport system by 2050 needs to relate to keeping within a carbon budget and not just focus on the end target.
- The pathways to decarbonisation don't provide any meaningful policy insights as they are not assessed against a regional transport carbon budget to demonstrate whether they are compliant with the UK's carbon budgets.
- Welcome the acknowledgement that 'business as usual' is not an option, that electric vehicles won't solve congestion and that further action is required to change the scale and nature of existing travel demand (pages 26 – 28).
- Welcome the recognition that land-use and planning need to be more closely integrated, but not sure how the strategy will help deliver this.
- The strategy should prioritise reducing the need to travel and road traffic reduction across all areas, not just in urban areas which on their own won't deliver the change required. We are concerned by policy 3 which seeks to reduce single occupancy car journeys, which could be difficult to measure. We're also not convinced it will help deliver the traffic reduction required.
- Support the road user hierarchy (policy 4) but if it is to mean anything then it needs to make a real difference to projects in the future and not just pay lip service to walking and cycling as too often happens at present. How this will happen is not clear.
- Strongly object to the inclusion of new or expanded roads which will increase traffic and carbon emissions as well as causing wider environmental damage. At present there are a number of policies that potentially allow for significant road building. Investment in roads should focus on safety, maintenance and renewal, or providing capacity for bus priority measures.
- Policy 5 should ban investment in high carbon infrastructure, not just have it as one of the factors to be considered, so there is a clear understanding of the priority and urgency attached to this. To be clear, emissions caused by construction should also be included when considering carbon impacts of new infrastructure.
- The strategy should set challenging (but achievable) modal split targets to drive change – this is completely absent at present

- Investment in digital infrastructure is welcome as it is critical for increasing connectivity and productivity as well as helping reduce the need to travel.
- The Integrated Sustainability Appraisal is fundamentally flawed in that it does not appear to have examined alternatives, altered the direction of the strategy or provided any real assessment of the carbon impact of various policy options. While it does have some good recommendations, it omits many negative impacts associated with road building, and combines impacts within corridor study areas making it hard to give any useful policy steer.
- In light of the UK Climate Assembly recommendation for a 6 – 15% reduction in traffic (on today's levels) by 2050 alongside an acknowledgment that there should be a moratorium on new road building until at least 2045, the draft strategy should be recast in light of this.
- Rushing to approve the final transport strategy would be a mistake given there are likely to be significant announcements by the Committee on Climate Change on its 6<sup>th</sup> carbon budget in early December, while the Department for Transport should be publishing its decarbonisation plan around the same time. Both could have significant implications for the final strategy.

## Overall strategy

There is much to commend the overall strategy which recognises business as usual is not an option and that significant changes are required if we are going to achieve net-zero carbon and improve the natural environment and quality of life. It recognises that closer integration between planning and transport is needed alongside reducing the need to travel and reducing road traffic. Equally, digital connectivity will be important in enabling some of this and that while technology will be important it cannot be the total solution. For example, electric vehicles don't solve congestion and also create particulate pollution.

More focus could be given to shifting freight off road and onto rail and to reducing the wider impact of freight, not just along 'freight corridors'. However, the biggest concern is that despite the fine words and policies at the beginning of the strategy, by the end it is pretty much business as usual with the promotion of a substantial number of new or expanded roads. These will undermine the region's ability to meet net-zero by 2050 in a Paris compliant manner as well as undermining active travel and public transport.

## Roads and carbon

The outcome of the combination of policies 5 and 21 is very likely that all road building will be enabled as the policies allow new roads to be built with some mitigation of their wider impact. These are then supplemented by a number of other policies (policy 12 – east-west connectivity, policies 14, 16 and 18 – improving north-south connectivity, policy 22 – transforming intra and inter regional journeys, policy 29 - connecting to global markets, policy 33 – supporting road freight) all of which are focussed on highway infrastructure or are written in such a way as to lend support for more or expanded roads.

However, it is very difficult to mitigate for the high carbon impact of new roads. The way of getting around this at a national level as outlined in the National Policy Statement for National Networks<sup>1</sup> has been to look at the carbon impact of a new road and then compare that to the UK's total carbon budget. This is a ridiculous test as it is highly unlikely that any single road would be deemed substantial enough in its own right to impact on the UK government's ability to meet net-zero.

No other factor used to inform decision makers of the suitability of new highway infrastructure is assessed in this way. For example, assessing the number of jobs a new road might create against the total UK workforce, or the economic benefits of a new road against total UK GDP would deliver equally insignificant results, if not more so. If these were applied in the same way as the test on carbon, then the roads would most likely not be built.

Given that surface transport accounts for 24% of all UK emissions<sup>2</sup> and road transport for 91% of these emissions which have hardly changed since 1990, it is clear that road transport is seriously off-target to deliver net-zero by 2050 in a Paris compliant manner. Therefore,

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<sup>1</sup> Paragraphs 3.8 & 5.16 – 5.18, [National Policy Statement of National Networks](#) (2014)

<sup>2</sup> Pages 21 & 106, Committee on Climate Change: [2020 Progress Report to Parliament](#)

there needs to be a moratorium on new road infrastructure that expands capacity as accepted by the UK Climate Assembly, and implicit in their recommendation of a 6 – 15% reduction in road traffic (on today's figures) by 2050<sup>3</sup>.

## Carbon pathways

Our main criticism of the Pathways to decarbonisation report is that it doesn't offer any credible pathways given that none are assessed against a regional transport carbon budget. Setting such a budget has to be the first step to defining a pathway, otherwise all you have is a single defining factor: the final target of net-zero. The problem with this is that there are numerous ways of getting to net-zero, many of which would involve failing to keep the UK within its national carbon budgets and thus failing to deliver a Paris compliant solution.

While the Department of Transport has so far resisted setting a transport carbon budget or even allocating one for the regions, there is pressure for it to do so and sufficient knowledge to enable it to be done. Indeed, the Tyndall Centre has produced a tool that allows energy only carbon budgets to be determined for different geographic areas. Putting in England's Economic Heartland into this model delivers a carbon budget for the region of 157.4 – 177.5 MtCO<sub>2</sub> depending on the allocation regime chosen, with an average annual reduction of somewhere between 12.2 – 13.6%<sup>4</sup>. Given that EEH already has estimates of the proportion of emissions that derive from transport it should not be too much trouble to derive a transport carbon budget from the above figures.

Another criticism of the carbon pathways is the way that they are presented, with some of the pathways being described as reducing road trips (Highly connected – 10% reduction in car trips 2015 – 2050, Behaviour shift (results-led) – 20% reduction in car trip rates) giving the impression of traffic reduction. Yet a closer examination shows that road traffic is projected to increase in all scenarios somewhere between 33 – 56%<sup>5</sup>. This is clearly at odds with the UK Climate Assembly recommendations and clearly at odds with other research showing that we need to reduce road traffic between 20 – 60%<sup>6</sup> if we are to meet net-zero by 2050 in a Paris compliant manner.

Finally, in terms of the accuracy of the pathways themselves, the assumptions behind them need to be re-examined and the models re-run. For example, all of the pathways show a significant proportion of plug-in hybrid vehicles remaining in the vehicle fleet for some considerable time. However, a recent report<sup>7</sup> has shown that the real world emissions from plug-in hybrids are on average two and a half times higher than official fuel tests suggest. This could have a significant impact on the carbon emissions calculated for the various pathways and affect whether they are Paris compliant.

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<sup>3</sup> Page 12, UK Climate Assembly: [The path to net-zero – Executive summary](#)

<sup>4</sup> [Tyndall Carbon Budgets Report](#)

<sup>5</sup> Figure 6, EEH, [Pathways to decarbonisation](#)

<sup>6</sup> Transport for Quality of Life / Friends of the Earth: [More than electric cars](#) (February 2019)

<sup>7</sup> Transport & Environment: [The plug-in hybrid con](#) (September 2020)

## **Integrated Sustainability Appraisal**

While the Integrated Sustainability Appraisal (ISA) contains some useful recommendations, it is fundamentally flawed in that it does not appear to have examined alternative scenarios, altered the direction of the strategy, or provided any real assessment of the carbon impact of various policy options.

The ISA starts off badly by failing to reference key sustainable transport policies in the National Planning Policy Framework (NPPF), including the location of new development. It does mention paragraph 150 which comments on location under climate change and flooding, but fails to reference paragraphs 102 – 111 which are the main sustainable transport and location policies within NPPF and which are relevant to the economy, health and well-being and community safety headings. It also gets an NPPF reference wrong under community safety.

Regarding development in National Parks and Areas of Outstanding Natural Beauty (AONBs) it fails to quote the whole of paragraph 172. The omitted text gives the important context for development in these nationally significant areas.

It also mentions a decarbonisation plan that doesn't yet exist but fails to mention the announcement within the consultation on a decarbonisation plan that:

*“Public transport and active travel will be the natural first choice for our daily activities. We will use our cars less and be able to rely on a convenient, cost-effective and coherent public transport network.”<sup>8</sup>*

However, the biggest fault is that the ISA still references the 80% carbon reduction target of the Climate Change Act with no acknowledgement that this was updated in June 2019 to net-zero. This is an identical error to that seen in the ISA prepared for Transport for the South East (TfSE) which was equally flawed.

### **Policy assessments**

These appear to be inconsistent and poorly done. For example, policy 5 is given a double green score on climate change (Table 2-1, Appendix B), yet it does not guarantee new roads won't be built so at best it should have a neutral score and if it still allows road building, a negative score.

Rail is given a double negative landscape score under policy 7, yet policy 21 only gets a neutral score for its road building projects, yet road building generally has a greater impact on the landscape as its footprint is so much bigger and its visual impact from traffic and noise pollution are worse.

Similarly, the assessments of corridor upgrades is unhelpful at best, as by mixing up the possible solutions of road and rail a neutral score is given to many possible impacts such as for policies 14, 16, 18, 22 and 29. These same assessments also have positive scores for

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<sup>8</sup> Ministerial Foreword, [Decarbonising transport: setting the challenge](#)

population and equality, health and community safety, yet without knowing which solution is being progressed within a particular corridor, these are impossible to determine. These assessments do nothing to aid policy development and prioritisation.

### **Health Impact Assessment**

The Health Impact Assessment (HIA) much like the ISA is variable in quality, making some good observations about walking and cycling, in Table 5-10, such as acknowledging that walkways and cycleways can be improved for all users, including those with reduced mobility and disability. This rightly contradicts the Equalities Impact Assessment (see below) which says active travel infrastructure is not for everyone.

However, in the same Table 5-10 (Mobility for the future) it says that shared space should be designed so that all users feel safe. This is obviously welcome but the point here is that in general, unless shared facilities are in areas with few pedestrians, shared spaces are best avoided and separate pedestrian and cycle facilities provided. Shared facilities in urban areas generally don't feel safe for both people walking or cycling, however well they are designed.

The inappropriate combining of different policy strands seen in the ISA is unhelpfully repeated here. For example, in Table 5-10 (Mobility for the future) it states that:

*“Investment into the development of electric cars and bikes would have some beneficial impacts on human health, in particular through the reduction in air and noise pollution, **though wouldn't necessarily encourage physical activity.**”* [our emphasis]

This fundamentally misunderstands how electric bikes operate and their potential benefits. In the UK, electric bikes require the pedals to be turned in order for there to be some assistance provided. Therefore, they do encourage physical activity and moreover, research suggests that they could replace up to 50% of car trips<sup>9</sup>, which would have huge benefits if only a proportion of these replacement trips were realised. E-bikes have enormous potential in helping to keep older people physically active, who would otherwise use their cars for short trips and become increasingly inactive with all the associated health problems.

While electric cars can have some benefits in terms of tailpipe emissions, they are still a significant source of particulate pollution and their lack of engine noise is a problem for people walking and cycling in urban areas potentially posing a greater danger to human health than conventional vehicles. At higher speeds, engine noise or lack of is less relevant as tyre and wind noise can dominate.

The HIA mentions severance caused by new roads schemes but gives positives for road safety and access and accessibility. However, this is an oversimplification of the factors at play. A new road, can improve safety over its length, but it can also reduce safety over a wider area if it induces extra traffic as most roads do. The extra traffic can also increase the fear of road danger, dissuading people from walking and cycling, even if a road scheme comes with improved active travel facilities along and across it. To suggest electric vehicles

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<sup>9</sup> CREDS, [e-bike carbon savings – how much and where?](#) (May 2020)

as a mitigation in these circumstances which would probably increase road traffic still further, given the costs of using electric vehicles is currently much cheaper than petrol or diesel driven ones, seems somewhat odd.

Finally, there is no mention of the impacts of climate change and more extreme weather events which could lead to greater impacts on vulnerable people unable to cope with extremes of heat and cold, or greater flood risk.

### **Equality Impact Assessment**

The Equality Impact Assessment (EqIA) is another flawed section of the ISA. This is demonstrated by its complete lack of understanding of how active travel, or walking and cycling infrastructure, is used by everyone. Paragraph 5.3.2 illustrates this perfectly:

*“Although positive, there are still possible adverse impacts that would be felt by those with limited mobility who are unable to participate in active travel (such as older people or people with a mobility limiting disability). Therefore, the Strategy should incorporate measures for all levels of mobility so as not to exclude people who are unable to participate in active travel.”*

This is nonsense and ignores the fact that everyone will use active travel infrastructure even if only the pavement, a point effectively acknowledged in the HIA (see above). All wheelchairs and mobility scooters use pavements so to suggest otherwise is wrong as is the statement that older people cannot participate in active travel. Those with mobility issues, may be restricted in how much they participate, but participate they do.

In addition, this also ignores the fact that 22% of disabled people cycle and that a third of those that don't, would like to<sup>10</sup>. In fact, many disabled people who cycle have mobility issues, often finding it easier to cycle than walk.

Another example of concerns with the EqIA is shown in table 5-1. When assessing new roads, while severance issues are flagged up, the following significant impacts are not:

1. The extra traffic created by expanding road capacity increases road danger (as well as severance), while improvements in reliability are generally short-lived.
2. New roads can undermine the competitiveness and viability of public transport and if this results in a loss of services this will impact on the more disadvantaged who don't own cars. This can happen on two counts:
  - i) People who can drive are abstracted from public transport because the car journey becomes quicker or more convenient, resulting in public transport losing revenue, and becoming less viable.

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<sup>10</sup> Page 29, Arup / Sustrans, [Cycling for everyone: a guide for inclusive cycling in cities and towns](#) (July 2020)



- ii) When traffic levels rise in the surrounding areas, due to induced traffic, buses can get stuck in congestion, slowing journeys, reducing reliability and increasing costs which again undermines the viability and attractiveness of services.
- 3. New roads mostly benefit the better off and those who own cars, not all road users as claimed. The disadvantaged mostly remain disadvantaged.

### **Community Safety Assessment**

We are not convinced this is a particularly accurate assessment. For example, policy 21 on increasing road capacity could affect safety on the road positively or negatively, since as traffic levels rise there could be more crashes as a result, not necessarily on the road upgraded, but on the wider network.

In addition, more traffic poses more danger to other road users on the wider network so a positive assessment is far from certain as indicated in Table 4-2.

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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

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