



Transport Action Network

Response to:

**Midlands Connect
Transport Strategy Refresh
consultation**

Introduction

Transport Action Network (TAN) welcomes the opportunity to comment on Midlands Connect's Transport Strategy Refresh. Despite the fact that the original strategy was only adopted in 2017, in the current fast-changing environment where things have moved on considerably since then, we believe it is right that the transport strategy is reviewed. We also welcome the recognition of the need to consider transport more broadly and not just focus on strategic routes.

However, we believe the strategy refresh could go further with a more ambitious carbon reduction target, combined with interim targets and a pathway for carbon and traffic reduction. It provides Midlands Connect with the opportunity to take a truly ground-breaking approach to new transport provision. However, without some refocussing of the challenges and objectives there is a danger that it will not deliver in the manner intended. In particular, issues which we feel need more focus are:

- integration with planning at a strategic level
- equity and fairness and in particular considering those without access to a car who are generally those most in need of help in 'levelling up'
- the fact that there is too much car and lorry traffic.

These issues are not just environmental or social, but also have a significant impact on the economy.

The objectives

Enable the population and employment growth planned by Midlands authorities

Strategic transport investment is needed for some new development but this should be focussed on sustainable, i.e. public, transport. Using roads to open up development sites creates car dependent developments which undermine other aspects of this strategy by driving up traffic, congestion and emissions. New strategic development should be focussed on places with mass transit in place, or capable of having it built for the development, which should then be designed around it. This objective should reflect this need.

Integrate national, regional and local journeys for ease of travel

We fully support this objective but would stress it should be more than just about the first and last mile. As presented, it provides quite a limited focus on local transport need and therefore risks underestimating what is needed over a far wider area.

Enhance the quality of life of Midlands residents

This feels a really crowded or busy objective, covering a wide range of issues which risks diluting the attention given to them. We would suggest that health and well-being issues should be separated out from the socio-economic ones which should be about providing greater transport choice and reducing inequality.

While there are overlaps between these areas, that is true of all the objectives and perhaps none more so that the ones on strategic and local transport journeys. These, however, have their own separate objectives.

Positively contribute to the ‘Net Zero’ carbon target by 2050

While we welcome the positive wording of this objective, it is rather woolly and doesn't commit Midlands Connect to actually achieving the target itself. Midlands Connect should be following the lead of the West Midlands Combined Authority which aims to achieve net-zero by 2041¹, or in the footsteps of its neighbour, England's Economic Heartland, which has adopted a 2040 net-zero target² alongside a traffic reduction target³.

This objective should also be focussed on the three carbon reduction steps of Avoid, Shift and Improve, in that order:

- Avoiding generating trips by better planning, demand management measures and better digital connectivity
- Shifting by providing better active travel and public transport, and then
- Improving those journeys that are left by decarbonising them.

Minimise other impacts on the environment from delivering new infrastructure

We object to the narrow focus of this objective's title which should emphasise reducing the environmental impact of transport network overall, i.e. improving things for both existing networks and new infrastructure. This would be far more relevant given the current biodiversity crisis and better reflect the text underneath it which talks about the impact of operating infrastructure in the region, not just building it. However, it is not clear if this covers all transport networks, or just the operation of newly built infrastructure. It should be the former.

¹ [#WD2041 Our Action to Meet the Climate Challenge](#) – West Midlands Combined Authority (June 2020)

² Page 6, [Connecting People, Transforming Journeys](#) – England's Economic Heartland (February 2021)

³ Policy 1, page 30, [Connecting People, Transforming Journeys](#) – England's Economic Heartland (February 2021)

⁴

Context – key challenges

We are broadly supportive of the key challenges but would like to see them re-ordered to place climate change first given it is the most urgent and significant issue. We would also like to see biodiversity which is currently in crisis listed as a challenge, as the strategy could play a major role in either reversing this decline, or exacerbating it.

Economic recovery and growth

We would take issue with the analysis of traffic growth within the refresh and the statement that: *“in recessions, people travel less by car but growth in car miles soon returns”* (Figure 4, page 11). This is a rather simplistic analysis of traffic growth as is demonstrated by the graph itself. The traffic growth before and after the oil crisis and the early 90s recession are both very different to that in the nineties and noughties where growth tailed off and even declined well ahead of the 2009 financial crisis. Indeed, the upturn in traffic after 2009 corresponds as much to the cutting of fuel duty in 2010 as to coming out of recession.

There is no automatic reason why road traffic should rise significantly if a sustainable transport strategy is pursued with demand management a key focus. This would help to deliver on numerous objectives, reducing traffic, congestion, emissions, improving reliability and improving health and well-being and greater equality.

If Midlands Connect wants to invest in ‘no-regrets’ infrastructure then it needs to avoid building new roads except as a last resort as this will drive up traffic, congestion and emissions, making it harder to reach net-zero as well as undermining other objectives. The next 5 – 10 years will be critical for this.

Levelling-up

Levelling up needs to be focussed on truly tackling inequality within the region, not just seen as the way of giving a green light, on the basis of job creation, to damaging development that otherwise would not be progressed. As was highlighted in Bus Back Better, the Government’s first ever national bus strategy, *“77% of jobseekers do not have regular access to a car”*⁵. Therefore, any levelling up strategy really needs to focus on securing funds for digital connectivity and active travel and mass transit in the region and not for new roads.

The fact that much of the poverty exists in urban areas reinforces the need for investment in sustainable transport. It also highlights that new roads will not help most job-seekers while they also bring a whole host of additional problems to those urban areas. The strategy mentions accessibility to coastal areas is of strategic importance, but while Lincolnshire has lower than average social mobility, there are many worse off areas more centrally located

⁵ Page 18, [Bus Back Better, National Bus Strategy for England](#) – Department for Transport (March 2021)

which would seem to be a greater priority and to suggest big new roads are not the solution either. This has the elements of a 'solution' looking for a problem.

Climate change and carbon

This section highlights the fact that we have only 10 years to make significant reductions in carbon emissions, yet this seems to jar with growth focussed on the strategic roads network in the next 5 – 10 years (pages 29 – 32).

Having said that, we welcome the fact that Midlands Connect is developing a pathway for carbon reduction. This needs to come with interim targets to help galvanise action. However, the modelling needs to be up to date as using old phase-out dates for electric vehicles (Figure 7, page 17) doesn't help with having sensible discussions as to what action is needed. This also needs to include different net-zero dates as the likelihood is that we will need to reach net-zero ahead of 2050 which is why we believe Midlands Connect should aim to be net-zero by 2040 or 2041.

This would be aided by adopting a traffic reduction target as England's Economic Heartland has done (5% reduction in private vehicle journeys every decade⁶) and as recommended by the Climate Assembly UK⁷.

We also strongly disagree with the sentiment of the statement on page 17 that: *"To develop a true pathway to net zero from transport we cannot simply say "build more railway and don't build any more roads".*" Surely the premise is if you're in a hole, stop digging? Stop making the situation worse, which is what building new roads is doing. Aside from it increasing car use, undermining public transport and increasing wider congestion and emissions, it also represents substantial investment that could otherwise have been used to build more sustainable infrastructure and so hasten the transition to a cleaner and fairer future. As the strategy recognises, *"there is no bottomless pit of funding"* (page 19).

Funding

Where we would agree with Midlands Connect is the complexity and restrictiveness of current funding streams which stifles innovation and speedy delivery of sustainable infrastructure. It leads to unsustainable developments, generating more car use and with little alternative transport, fuelling inequality.

However, we would caution against the false proposition of needing to strike the 'right balance' between having the maximum short-term impact in order to help economic recovery against the longer-term opportunities to decarbonise transport and level-up.

⁶ Policy 1, page 30, [Connecting People, Transforming Journeys](#) – England's Economic Heartland (February 2021)

⁷ Paragraph 3, Page 61, [The path to net zero](#) – Climate Assembly UK (September 2020)

Firstly, climate change needs short term urgent action, as well as longer term action, as does reducing inequality and kickstarting the economy. These are not incompatible. Focussing on sustainable transport initiatives linked with investment in road maintenance would deliver more jobs, more quickly and open up more opportunities for the jobless compared to spending on big roads, which take years to be built and doesn't create that many jobs in the process.

Conversely waiting 10 years before enacting serious decarbonisation initiatives would be too late as the region would have likely used up its carbon budget by then.

Our emerging Strategy refresh ideas

As we have said before there should be a moratorium on new roads, or that they should only be considered as a last resort, so we do not agree that new roads being fed into the pipeline are compatible with decarbonisation plans. This would be in line with the Climate Assembly UK scenarios which all included a moratorium on roadbuilding⁸.

We would like to see more focus on shifting freight onto rail rather than only shifting HGVs to alternative fuels, as mentioned on page 20. This would reduce congestion and pollution and road danger in one go.

We support smart ticketing and a focus on rural areas. The expansion of the strategy to cover end-to-end journeys is important and welcomed. Without good quality local transport infrastructure, many strategic journeys, particularly by rail, are not viable. Hence local transport is critically important to the health of the strategic networks, to enable rail and bus to maximise their potential, benefiting the region with better services and reduced traffic levels, reduced emissions and improved reliability.

Our two criticisms of *Figure 9: supporting end-to-end journeys* (page 21) is that it appears to limit the thinking and scope of interventions. Although it might only be symbolic, this does matter as it will shape thinking. There again it could be an unintended consequence of the design, but our concerns are:

1. First mile / Last mile is not a good tag for these journeys which could be several or more miles in length, particularly when considering cycling ranges and even more so with e-bikes or shared transport, including taxis. There is a danger this limits consideration of local journey networks to small areas around trains stations for example.
2. Rural mobility is depicted at the top of the figure next to buses, trains and electric vans while urban mobility is next to active transport, digital technology and scooters.

⁸ Pages 67, 70 & 72, [The path to net zero](#) – Climate Assembly UK (September 2020)

This gives the impression that the solutions are quite narrow and very different for urban and rural. While there will be differences, e-bikes have a significant potential to reduce car use in rural areas⁹ and expand the distance people can cycle. For example, one of the Danish superhighways from a rural area outside Copenhagen has an average trip distance of 9.2 miles¹⁰.

Responses to consultation questions

1. To support the economic recovery post-Covid-19, which transport projects and programmes would you prioritise for delivery within the next 5 years?

As we have already stated, and the strategy refresh has acknowledged, the climate emergency needs urgent action now. However, wording within the refresh suggests it's possible to carry on building new roads despite their carbon and other negative impacts, while ignoring the fact that they are not the best way of helping the jobless find work as most don't have access to a car.

Secondly the building of so many roads, other than those built by Highways England, requires substantial funding from local authorities which means they won't be able to invest in active travel and public transport at the levels required to make a significant difference for levelling up or on climate change. Investing in these sustainable measures along with tackling the backlog of local road maintenance would be a quicker way of stimulating local employment and delivering change. As Bus Back Better states: *"Buses are the easiest, cheapest and quickest way to improve transport. Building a new railway or road takes years, if not decades. Better bus services can be delivered in months."*¹¹ Therefore, an audit of bus services, fares and integration should be prioritised with a view to making services more accessible and relevant to residents so the bus becomes a viable option for more people. This should be in addition to the Smart ticketing proposals.

Other priorities should be to develop a network of cycle lanes and tracks between communities, including rural, combining this with the promotion of e-bikes, both as shared transport and through grants and discounts. This could be based, for example, on the Transport for West Midlands' trial in Coventry of their Car Take Back scheme¹² encouraging people to scrap their old car for £3,000 of mobility credits for public transport, or a taxi or uber or a hire car. Allowing some of this money to go towards a new cycle or e-bike would broaden the impact of the scheme.

Promoting active travel also needs to come with other measures which focus on reducing road danger, given that two thirds of adults and 71% of women feel it's too dangerous to

⁹ [e-bike carbon savings – how much and where?](#) CREDS (May2020)

¹⁰ Page 11, [Cycle Superhighways: Capital region of Denmark](#) – Office for Cycle Superhighways (2018)

¹¹ Page 16, [Bus Back Better, National Bus Strategy for England](#) – Department for Transport (March 2021)

¹² West Midlands Combined Authority [news story](#) (16 March 2021)

cycle on our roads¹³. That means rolling out more 20mph zones in residential streets, 40mph limits or lower on rural roads, implementing school streets and active travel neighbourhoods, helping to cut rat-running. All of these should be in addition to reallocating road space and building protected cycle ways and creating a more pleasant and safer pedestrian environment.

Other short-term priorities are timetable reforms and the promotion of public transport, especially important to grow patronage after Covid and schemes to cut fares. For rail, electrification of lines and the re-opening of stations and lines should be progressed apace. This should include prioritising investments that improve rail freight capacity (such as the electrification of the line between Nuneaton and Birmingham) to remove HGVs from the roads, helping to reduce road danger, ease congestion and improve reliability.

Workplace parking levies across the region with funds ringfenced for investing into active travel and public transport should also be explored. It would help raise the level of debate about the need for change while also helping deliver better alternatives to make it easier for people to alter their transport habits.

Finally, the region should look to prioritise better and faster broadband to help lock in some of the working from home seen during the pandemic and to make it a more practicable option. For those who want to avoid the weekday commute, or find it difficult to work from home, or want to work in a more interactive environment, the region should promote or pilot remote working hubs. This would help reduce travel demand and reduce emissions as well as improve reliability on road and rail by reducing rush hour peaks.

2. In response to the Government's levelling-up agenda, Midlands Connect is identifying major transport projects which will improve the lives of people in the region and across the UK. Which specific transport projects and programmes would you prioritise for delivery by 2030?

As we have already stated, the levelling-up agenda needs to focus on helping those most in need who won't have access to a car. Therefore, infrastructure and service provision needs to focus on local accessibility, i.e. active travel and public transport.

So, the response to this question is more of the answers to question 1, including delivery of some bigger rail schemes and other projects which won't be delivered, or will only just start to be delivered, in the first five years.

3. As a region, we need to respond to the climate change emergency. What are your top three priorities for a greener, more sustainable transport network?

¹³ Page 10, [Walking and Cycling Statistics, England: 2019](#) – Department for Transport (August 2020)

- Stop making things worse – so no more road building, focus on maintaining what we’ve got properly, including following an ambitious carbon reduction pathway with interim targets
- Quick wins: focussing on delivering at pace and scale on active travel and better (and cheaper) bus services and infrastructure – including through reallocation of road space
- Integrate transport and planning – there needs to be a major focus on location of new development in places that minimise car use and can be well served by viable mass transit for the long term. Prioritisation should be given to brownfield redevelopment, particularly high streets which are losing so much retail.

4. *What technology solutions do you think the Government should invest in to help the Midlands’ greener and low-carbon economy?*

This needs to be more of the above and technology that enables more of the above so:

- Gigabyte infrastructure - better and faster fibre broadband for more home working, and reducing travel for meetings, including developing small business hubs
- Smart ticketing and reduced fares to make public transport more competitive
- Speeding up electrification of the rail industry and bringing in cleaner buses
- An eco-levy to ensure motorists pay towards their full external costs while raising funds for investment in sustainable transport
- Better integration between different transport services to simplify ticketing and purchases, including around shared transport, e.g. car sharing, e-bike and e-scooter hire, etc.

Conclusion

Overall, while we welcome the refresh of the transport strategy and a broadening of its focus, the strategy still seems caught by the solutions of the past. While recognising the urgency of the climate change crisis and the need for levelling up, its proposed ‘solutions’ would potentially make both of these issues worse.

In the 21st century, we cannot be harking back to 20th century road building schemes, but need to make up for 50 years lost investment in active travel and to a lesser extent bus and rail services. The question for Midlands Connect is does it want to be a region that leads change in the UK and thereby gain an advantage over other areas, or does it want to lag behind and potentially lose out?

If it is the former, then it should be taking its cue from the West Midlands Combined Authority or England's Economic Heartland in setting a challenging net-zero target and not just defaulting to 2050. It should also look to adopting a traffic reduction target in line with the Climate Assembly UK of 2 – 5% per decade¹⁴. This would place it firmly at the forefront of change and enable it to deliver fully on its ambitions for the region.

¹⁴ Paragraph 3, Page 61, [The path to net zero](#) – Climate Assembly UK (September 2020)

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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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