



Transport Action Network

Response to:

Peninsula Transport Vision consultation

1. Introduction

Transport Action Network (TAN) welcomes the opportunity to input into the development of a sustainable transport vision for Peninsula Transport in the south west. In order to produce a credible transport strategy, it needs to ensure that the strategy is based upon the latest scientific understanding of what we need to do to deliver the UK's carbon reduction targets. It also needs to represent a significant shift away from how things have been done historically with a more holistic approach to planning new infrastructure and services, including with planning. Ever more so than before, a key strand of this strategy needs to address digital connectivity which can have a profound impact on the need to travel as well as on the nature of trips.

Unfortunately, the premise upon which this strategy is based is wrong. That is that carbon emissions, while needing to be cut, do not require a dramatically different approach by the shadow sub-national transport body. Since Peninsula Transport commissioned its Economic Connectivity Study in July 2020, the world has moved on significantly. Apart from the fact that its projected road carbon reduction pathway still has around a million tonnes of CO_{2e} in 2050¹, 20% of the total today, the pathway fails to help the UK reach its National Determined Contribution (NDC). This aims for a 68% cut in emissions by 2030 on 1990 levels and was adopted in December 2020.

Given road transport emissions have barely changed since 1990, that equates roughly to a 68% cut on 2016 levels which the report estimates are around 5 million tonnes CO_{2e} a year. In 2030, the graph shows projected emissions to be around 3.7 million tonnes CO_{2e} a year, when with a 68% reduction they should be down to 1.6 million tonnes CO_{2e} a year. That indicates that there needs to be greater urgency in cutting emissions over the short to medium term than is acknowledged within the vision document. It points to the need to reduce traffic and accelerate to EVs together, rather than as an either or as painted in the vision. These actions should be prioritised in parallel ahead of building more roads which risk making the problem worse.

While it is appreciated that the NDC target was adopted after the Economic Connectivity Study was published, this was some eight months before the vision document was put out for consultation. Given the profound changes that meeting the NDC target will require, it is surprising that this was not fed through into the vision and strategy development, which seems rooted in a different era. If necessary, the consultation should have been postponed and it's unfortunate that it wasn't as the assumptions behind the development of the vision are consequently flawed.

¹ Figure 4-3: Peninsula Road Production Carbon Emissions and Forecasts, page 41, [Peninsula Transport Economic Connectivity Study](#), July 2020

Another issue is that while it is stated that the vision, and hence the strategy, is moving away from predict and provide, the mindset behind it still seems rooted in this approach. It acknowledges that travel has changed with Covid but then appears happy to sit back and observe how travel will change post pandemic, rather than taking this as an opportunity to shape what emerges. The two approaches are very different. Again, given the scale of the challenge being faced, Peninsula Transport needs to be leading that re-shaping by investing in the infrastructure and services that will change behaviour and reduce road emissions as quickly as possible. This will not be achieved by investment in new roads, which will have the opposite effect.

While it is welcome that all authorities in the area have declared a climate emergency, this means little unless it comes with a new approach to providing transport infrastructure and services and urgent action taken to reduce carbon emissions.

2. The Vision

The headline vision as stated is as good a place to start as any other: “Transforming transport across the peninsula to enable our society and economy to thrive and our unique and outstanding environment to flourish”.

Combined with the key messages, contained on page 4, talking about the need to “build back better”, and to “rebuild our economy and society in an environmentally responsible way” and that “we need an ambitious transport strategy” and we were hopeful for something quite radical and transformative.

Unfortunately, it is less clear how these key strands have been developed within the broader vision, which seems to have slipped pretty quickly back into a more traditional transport planning approach.

3. Goals

Comment on the goals (page 5) is prefaced by the comment that these need to be reappraised to see whether they can deliver the necessary carbon reduction at a scale and pace required to meet the UK’s NDC by 2030.

3.1 We will improve connections between people, businesses and places

However, this talks about business as usual but that we will do it carefully to be sensitive to the environment. This isn’t exactly much of a commitment as that should be taken as a given to conform with national planning policy. It sounds like greenwash.

Connectivity is the key - spending on new roads won’t deliver long term improvements and will just move problems onto other locations. Better access to sustainable transport reduces

inequality as those people without access to a car are the most marginalised and they get little or no benefit from spending on roads.

3.1 We will deliver affordable, zero-emissions transport for everyone

This is welcome but to deliver the changes required, a step change in thinking will be needed along with the investment to deliver. The magnitude of this task needs recognition and is not compatible with business as usual with a few tweaks.

3.3 We will help to improve the health and wellbeing of communities in the Peninsula

We fully support this.

3.4 We will help the Peninsula to be a great place to live and work

People need to have access to a range of high-quality sustainable transport choices, not just travel choices – this should be spelt out so that there can be no misunderstanding.

4. Our challenges and opportunities

4.1 Decarbonisation

It is not either or, it is both. There is both a need to reduce demand for transport and to reduce the carbon emitted by transport. The latter cannot be achieved quickly enough on its own as acknowledged in the Government’s Transport Decarbonisation Plan²:

“But we cannot, of course, simply rely on the electrification of road transport, or believe that zero emission cars and lorries will solve all our problems, particularly for meeting our medium-term carbon reduction targets to 2035.”

and

“Improvements to public transport, walking and cycling, promoting ridesharing and higher car occupancy, and the changes in commuting, shopping and business travel accelerated by the pandemic, also offer the opportunity for a reduction or at least a stabilisation, in traffic more widely. That will benefit everyone, drivers included.”

4.2 World of Work

Opening up logistical and freight corridors could transform the peninsula economy in ways not anticipated as it would allow centralised depots / businesses to better access the

² Foreword, page 6, [Decarbonising Transport: A Better, Greener Britain](#), July 2021 – Department for Transport

peninsula market which could undermine local producers. It is not a given that it will be positive for the regional economy.

4.3 Urbanisation

Higher density development focussed on high quality, convenient public transport alongside exemplar active travel infrastructure will be essential to tackle climate change, inequality and societal health issues. It is also necessary to make public transport services viable.

4.4 Digitalisation

High speed broadband needs to be a priority here alongside giving the public better and easier access to information about the cost and availability of various transport services.

4.5 Flexible Lifestyles

There needs to be a greater focus on reducing the impact of van delivery and last (few) mile(s) delivery such as by cargo bike, certainly for more urban areas.

5. Travel and mobility

From the statistics presented on this infographic, it suggests there is an urgent need to provide safer, more convenient and attractive infrastructure for active travel and better public transport. Given that half of all workers travel less than 10km to work, many of those journeys could be switched to e-bikes and public transport if people were given the choice. Research by CREDS suggests that e-bike could replace up to half of all car emissions especially in suburban and rural areas³.

Increasing public transport speeds and options to the region could also help reduce car numbers, both within and to the region. Both these measures would reduce the pressure on the landscape and local roads from there being too many cars, a problem that the area currently suffers from. Building more roads risks making this situation even worse, especially in the tourist season.

Poor digital connectivity which can help reduce travel and improve productivity is also an issue for the region.

6. Delivering for the Peninsula

6.1 Strategic Economic Corridor Studies

³ [e-bike carbon savings – how much and where?](#) May 2020 - CREDS

These seem to relate to roads when they should be considering rail, particularly if the region is looking to move more goods by rail as well as people. Areas well served by public transport should also be the focus for development as the transport impact (including carbon emissions) will have the best chance of being minimised in these locations.

6.2 Carbon Transition Strategy

While it is important to take find solutions that are socially acceptable, it is worth emphasising that we are in a climate emergency and doing things the way we've always done them and at a slow pace will not suffice any more. This needs to be recognised here, rather than suggesting nice and easy does it.

6.3 Rail Strategy

A sense of urgency is required here to both decarbonise and improve rail services so that they can provide a low carbon alternative as soon as possible. This may not be entirely within the region's gift, but it should be a priority when lobbying for investment.

6.4 Freight Strategy

Any freight strategy also needs to do more than just consider last mile delivery and community and environmental needs. It needs to prioritise minimising the impact of HGVs on local communities. As lorries become longer and potentially heavier that will become a more pressing need if the region is to reduce road danger and encourage more active travel.

6.5 Rural Mobility

This needs to consider urban – rural connectivity as the two are closely intertwined. With a heading just talking about rural mobility this could be overlooked. People in rural areas need to access towns and cities for goods and services, while those in urban areas need to access the countryside for some goods and services but mostly recreation. Having better active travel and public transport links between the two could significantly cut down on the negative impact that too many cars can have on both areas.

7. Next Steps

This has to focus on reappraising what needs to be done to reduce carbon emissions quickly enough to enable the UK to meet its NDC of a 68% reduction in emissions by 2030 on 1990 levels. More thought also needs to be given as to what will truly help those most in need, who are normally those without access to a car and how to make lives easier to live without having to own a car. That would not only help reduce carbon emissions and reduce inequality, but it would also improve people's quality of life and minimise environmental harm.

7. Conclusion

Overall, this vision contains the seeds of some good ideas but unfortunately still seems wedded to many of the failed solutions from the past, with an unhealthy reliance on road building. It appears to ignore the problems that this will bring with even more cars having to be accommodated on the region's rural roads and in its overrun car parks.

It is unfortunate that with the advent of the UK committing to a 68% reduction in carbon emissions by 2030 last year, that the opportunity wasn't taken to re-appraise the vision. This needs to be done now as it will lead to a significantly different emphasis if done properly. Without this, any future Transport Strategy will be meaningless.

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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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