



Response to:

**Transport for the North's
Decarbonisation Strategy
consultation**

Introduction

Transport Action Network (TAN) welcomes the opportunity to comment on Transport for the North's (TfN) draft Decarbonisation Strategy which it believes is an important step forward in urgently tackling climate change. It is recognised that this a groundbreaking strategy, the first of its kind in the regions, and even came ahead of the national plan from the Department for Transport, which was eventually published in July this year.

Welcome the draft strategy

TAN broadly welcomes TfN's draft Decarbonisation Strategy, which will importantly map out how the North progresses on its pathway to net-zero before 2050, and that it is TfN's role to lead by example. However, TfN needs to ensure that its approach is robust and that it has fully covered all aspects of transport related emissions.

All carbon emissions need to be counted

On page 5 of the strategy it states that 22% of UK's total carbon emissions in 2019 came from surface transport and that 95% of these came from road transport. However, these numbers ignore land use change, construction emissions, operation and maintenance, power generation for electric vehicles, consequential effect on settlement patterns and activity and wider synergistic impacts associated with new and existing infrastructure¹.

At present it would appear that only user tailpipe emissions are being counted in any assessment of carbon impact from new infrastructure. An assessment of indirect emissions (emissions from power generation for electric vehicles) (figure 17, page 42) shows that these emissions can add a further 2-3% on projected total surface transport emissions for the more realistic scenarios. These are dismissed as very low, yet in terms of the projected emissions gap, they are significantly more important. For example, the minimum gap between the decarbonisation trajectory and the urban zero carbon scenario is around 3-4 Megatonnes CO₂. In this situation an extra 0.5 Megatonnes from power generation becomes quite significant and that's before other overlooked emissions are included.

We believe that it is particularly important that whole life emissions are included in any carbon calculations in addition to the other aspects previously described. If new roads are built, not only do they reinforce current car dominance but they also encourage more people to drive, and to drive further. In order to do that more people will need access to more cars and that comes with substantial manufacturing emissions, often ignored in assessments.

¹ Section 6, [First Witness Statement of Professor Phil Goodwin](#), March 2021

More thought also needs to be given to the interaction with planning and the emissions that risk coming from lots of road building at a local level to support car based developments. These don't appear to be fully addressed at present which is a significant issue for the strategy and will undermine its credibility and effectiveness.

However it is welcome that TfN will look to see how it can incorporate emissions from aviation and shipping in its strategy (page 14).

Is the trajectory good enough?

The trajectory as depicted in Figures 2 and 3 appears a little confused. Figure 2 shows it to reach zero emissions in 2045 while figure 3 and the text talk about near zero emissions in 2045 (pages 12/13). While it is welcome that the rate of progress will be aligned to the Climate Change Committee's Carbon Budgets as a minimum, what is less clear is how a 55% reduction in emissions from 2018 to 2030 (page 12) meets the requirements of the UK's Nationally Determined Contribution (NDC) of a 68% cut in emissions from 1990 to 2030, when transport emissions have barely changed since 1990. We strongly question whether a 55% cut will be sufficient for the UK to meet its NDC and cannot see why transport should be given an easier ride on this. Given other sectors are also struggling to reduce emissions, there is no or little slack available to make up for transport's shortfall.

It is also not clear how the full range of transport related emissions will be monitored across the region and what will happen when emission reductions are off track. This is particularly likely if some of TfN's partners with more challenging targets are reliant on future technological solutions coming to the rescue, rather than taking action now to cut emissions (page 13). Any failures by these authorities could then undermine the whole strategy.

All travel needs to be targeted

Figure 4 (page 15) shows the breakdown of number of trips and trip length. It is clear that TfN acting as a strategic authority could be hugely influential in reducing emissions from the 35% of mileage generated by less than 3% of overall journeys. Strategic interventions by TfN to switch from road to rail could be hugely beneficial, whereas continued investment in new roads could lock in high levels of carbon emissions for many years to come.

While it is important for TfN to focus on strategic issues, active travel, local public transport and shared services form part of any strategic journey. Without good quality and attractive local services and infrastructure, people will be less inclined to switch out of their cars to take a longer distance public transport journey. It will not be good enough to have high quality walking and cycling networks say in Manchester, if in Sheffield it's not that easy or attractive to get around without a car. The success of strategic public transport and its ability to help reduce emissions is also dependent on local action, so TfN's strategy will need to be able to encourage action across all parts of the region and at all levels.

A longer term view

We are concerned that the draft strategy talks about resequencing a project, such as a road scheme, if it doesn't fit with the strategy and bringing it forward when the majority of vehicles on the road are zero-emission. While we welcome the acknowledgement that road schemes are potentially damaging and taking us in the wrong direction, we believe this is wrong for two reasons:

1. simply delaying a road scheme risks chilling investment in truly sustainable alternatives as decision makers simply put off other investments which might do good in the expectation that they will need to spend millions or more likely billions on a new road in the not too distant future.
2. 50% of vehicles on our roads being zero-emission would most likely mean cars, yet HGVs which while forming a small proportion of overall vehicle numbers, are responsible for nearly a third of all emissions (figure 7)². Therefore, it's likely that emissions would still be well over 50% of current levels, i.e. this target could be misleading and lead to complacency.

Given the current failure to properly assess all aspects of emissions from new roads, and the negative impacts that a car based society has on public health, the environment and potentially the economy we believe new roads should be permanently halted if they do not pass the test, not merely resequenced (page 19).

Proposed framework for carbon benchmarking

At a programme level, comparison of economic and carbon impacts need to be done on a level playing field. At present carbon emissions for a particular scheme or programme are compared to the UK's total carbon budgets and dismissed as insignificant. Yet comparing the economic benefits of a scheme or programme to the UK's GDP often yields even smaller percentages. Assessing economic benefits on the same basis as carbon would suggest that there is no overriding need or strong case to proceed in contrast to what is often asserted. It is difficult to see how, if this is being done thoroughly, new roads would form part of the investment programme from the outset.

We are somewhat confused by the proposed carbon benchmarking as set out in figure 6 (pages 20/21) in relation to programme sequencing. This shows that if a programme is not consistent with TfN's decarbonisation strategy, a new policy is required. Surely, if a programme is not consistent with the strategy, it should be cut and investment should flow into more sustainable options? New policies shouldn't be required for this as the strategy should be structured in a way that anticipates some schemes not going forward.

² Note the amount of CO2 in Figures 7 and 8 do not match up for cars, HGVs and LGVs

In terms of project level assessment, we are also concerned with the approach being suggested. In particular, to merely delay projects rather than look at less damaging alternatives which actually reduce carbon. As we explained in the previous section, delaying a road scheme for example could have a chilling effect on investment in alternatives. This could leave an existing issue unresolved for many years, rather than seeking to address the cause of the problem today and to tackle it in different ways such as demand management. The wider negative impacts of road building, which cannot be covered up with green-washing (planting a few more trees), provide additional reasons why they should not be progressed.

Bridging the gap

The strategy highlights that all scenarios fail to reduce carbon emissions quickly enough. It is estimated that vehicle kilometres will need to be reduced by 1 - 4% in 2025 and 3 - 14% in 2030 (page 49). However this is misleading as it is set against a projected increase in traffic levels (page 64) which are regularly over-estimated.

Also, these figures ignore indirect emissions and other carbon emissions associated with new infrastructure, especially road building, that are currently excluded. With these added in, the need for traffic reduction could rise significantly and these numbers are likely to be far too low.

These figures also suppose that the trajectory is dropping fast enough in the first place, given we question whether a 55% reduction by 2030 could undermine the UK's NDC of 68% reduction in emissions by 2030. That's before considering the likely success of interventions such as eco-driver training and deterring bigger and more polluting vehicles from being sold.

Draft Policies

While we welcome the discussion on demand management and road use charging, this section of the strategy is disappointing. To start with there is no real focus on shifting freight to rail as a policy priority. While it is true that moving freight onto rail is mentioned within PGA12, it is listed as one of several issues to examine and is given no real visibility or priority.

As we pointed out previously, HGVs produce nearly 30% of all carbon emissions, as well as having other negative impacts and they are likely to represent a large number of the trips over 35 miles which if transferred to rail could have a significant impact on lowering emissions. Therefore it seems only logical that they are targeted as a priority.

Apart from mentioning that active travel can benefit the physical and mental well-being of users (page 59), no mention is made of the wider positives that arise from demand management and less traffic (less noise, less impact on buildings, more space for people, less

pollution, stronger local economy, etc.). This needs to form part of the narrative to show why change could be hugely beneficial.

Park & ride is also mentioned in Table 5 (and on page 68) for two of the scenarios as a way of providing access into cities from rural areas without creating more congestion. Yet this ignores several issues:

1. Park & ride can actually increase car use and carbon emissions³
2. Park & ride only works in one direction, i.e. it provides no access for city dwellers without access to a car to areas of countryside
3. Park & ride does not improve access to cities for rural people without access to a car
4. Park & ride can undermine the commercial viability of rural bus services⁴ which could address many of the problems listed above

It is welcome that planning is included within demand management but its role in reducing the need to travel and reducing car use, needs to be spelt out more clearly, along with the benefits these would bring. Support for 15 - 20 minute neighbourhoods is also supported but planning's role needs to extend further than that to include better locational policies for new development based on accessibility and stopping big car generating developments that create so many problems.

Given the benefits in terms of modal shift and carbon benefits⁵ shown from building cycle superhighways combined with e-bike promotion and providing better urban and rural connectivity⁶, it is disappointing that this receives relatively little focus in the strategy.

Conclusion

Overall, we welcome TfN's draft decarbonisation strategy as an important step forward in tackling carbon emissions from transport. While we welcome much of its content and focus we believe that it needs to go much further and faster in reducing these emissions.

Part of the problem seems to be that many emissions related to transport are not being included or are being dismissed, such as indirect emissions, even when together they have a significant impact and are significant in their own right when considering the policy deficit that needs to be addressed. It is also unclear how embodied carbon will be accounted for when it is part of the strategy but not included in the trajectory and pathways (page 77).

³ [The effectiveness of park and ride as a policy measure for more sustainable mobility](#), Parkhurst & Meek, 2014

⁴ [The effectiveness of park and ride as a policy measure for more sustainable mobility](#), Parkhurst & Meek, 2014

⁵ [e-bike carbon savings - how much and where?](#) Anable, Philips and Chatterton, May 2020

⁶ [Cycle superhighways](#), The Capital Region of Denmark, 2018

As research is highlighting we are likely to need traffic reduction of around 20% on today's levels, not 3 - 14% from some future higher baseline. This places the strategy on a potential collision course with the science and needs to be addressed if it is to have any credibility.

Critical to the success of the strategy will be how TfN can interact with partners in the region, especially a Government focussed on road building regardless of the consequences. It's relationship with local authorities will also be critical as currently it is not clear how their road building aspirations can be influenced by the strategy. Without a significant change in approach at all levels, it is unlikely that transport emissions will be sufficiently mitigated, putting at risk UK national targets.

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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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