



Transport Action Network

*Response to:*

**Transport East ISA Scoping  
Report consultation**

## **Introduction**

Transport Action Network (TAN) would like to welcome the opportunity to comment on Transport East's Integrated Sustainability Appraisal (ISA) Scoping Report. Please note that these comments are not exhaustive but are examples of issues of concern found in the scoping report.

## **Draft wider outcomes**

In light of the recently published Intergovernmental Panel on Climate Change's (IPCC) report<sup>1</sup>, the Transport Decarbonisation Plan and the Government's targets of a 68% reduction in greenhouse gas emissions by 2030 and 78% reduction by 2035, the ambition on carbon emissions is rather vague and could allow any progress however small to be claimed as a success.

A meaningful outcome on carbon emissions needs to talk about pathways and intermediate targets as net-zero is so far away as to be meaningless for many decision makers. There is also no date attached to this, not even 2050, further undermining its usefulness.

## **3.2 ISA Assessment**

### **Strategic Environmental Assessment**

When assessing new infrastructure proposals, assessments need to consider lifecycle costs of vehicles that use the transport infrastructure. For example, building a new road and increasing car use and ownership is creating emissions far beyond the construction and use of the roads. These manufacturing emissions need to be factored into assessments as do the wider emissions associated with building a more car-based society.

The SEA also needs to make sure it covers aviation emissions and looks at the efficiency of hydrogen production, which even if produced from renewable electricity, is a far less efficient use of that energy.

### **Natural Capital Assessment**

This seems unhealthily focussed on how transport infrastructure can contribute to the restoration of biodiversity and ecosystem services, ignoring the severance, pollution and loss of habitat that also result, particularly from road building. It is unclear why this is mentioned here in such a partisan way other than to sow the seeds of justification for future road building. Other topics are not dealt with in this way, focussing more on process than possible outcomes.

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<sup>1</sup> Climate Change 2021: The physical science basis – IPCC, 7 August 2021:  
[https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC\\_AR6\\_WGI\\_Full\\_Report.pdf](https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Full_Report.pdf)

## **Health, Community Safety and Equalities Impact Assessments**

These assessments require particular scrutiny as they often contain huge gaps and unfounded assertions in their conclusions. We have found these to be particularly poor in other sub-national transport body ISAs and hope these mistakes won't be repeated here.

Many assessments often ignore or downplay impacts on non-drivers, including the disabled (by assuming all disabled people drive), children, women and other disadvantaged groups. They often ignore the negative economic impact of road building on public transport and the severance and pollution caused by roads and traffic and often glibly assert new roads support public transport.

## **Review of Plans, Policies and Strategies**

It is unclear why international plans, policies and strategies which are referenced in 4.2 are missing from the overview in 4.1. Given the seriousness of the threat from climate change it would be expected to see the Paris Agreement mentioned here alongside the Government's National Determined Contribution (NDC) target of 68% reduction in greenhouse gas emissions by 2030 from 1990<sup>2</sup>.

Also missing is mention of Gear Change and Gear Change: one year on despite cycling being mentioned within the ISA and potentially an important component of strategic journeys by public transport.

It is also worth noting that the Transport Decarbonisation Plan has now been published and the National Policy Statement for National Networks is to be reviewed, a recognition of how out of date it is.

An impartial assessment of the NPPF would also recognise that despite some worthy aspirations on sustainable transport within the NPPF, these are often ignored or side-lined by decision makers focussed on cars or housing numbers. This is a major weakness that will undermine moves to reduce carbon emissions as fast as possible.

### **4.2 Key Themes**

It is not clear why certain plans, policies and strategies are listed under certain topics and not others. For example, RIS2 is listed under population and socioeconomics and community safety but not under health. Given the huge pollution it will cause it needs to play a role reducing pollution from the strategic roads network, not making things worse building more roads and increasing traffic levels.

Similarly, UK traffic causes 63,000 tonnes of microscopic tyre particles (microplastics) to be released into the environment every year, most of it eventually entering into rivers and the

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<sup>2</sup> UK's NDC, 2020:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/943618/uk-2030-ndc.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/943618/uk-2030-ndc.pdf)

sea<sup>3</sup>. Yet no mention of RIS2 or other plans that impact on traffic levels are included under water environment.

## 5.6 Community Safety

This commentary is particularly flawed in that it uses the outdated and discredited term accidents to describe crashes or collisions<sup>4</sup>. Use of the word accident gives the impression that crashes are unavoidable when in reality much can be done to reduce their numbers.

Additionally, there is no mention of road danger or perception of road danger. This issue does not show up in crash statistics as roads can feel so dangerous, they put people off walking or cycling on them, suppressing the number of incidents. This results in these areas failing to be flagged up as having a problem that needs resolving. This needs to be addressed and is particularly relevant to new and bigger roads which increase traffic levels not just on themselves but across the wider road network.

Indeed, two-thirds of adults feel it is too dangerous for them to cycle on the road, rising to 71% of women<sup>5</sup>. Yet this is not mentioned here, the only mention of safety being in relation to public transport.

## 5.17 Interaction between topics

There were some interactions we were surprised weren't flagged up. Examples include:

- climatic factors and noise and vibration – with hotter summer temperatures and the need to open windows to keep houses cool, noise could have a greater impact on the health and well-being of the public
- cultural heritage, along with landscapes and townscapes are adversely impacted by noise and in the case of buildings, vibration as well. Yet despite these significant impacts these topics are recorded as having no interactions with noise and vibration

## 6.1 Draft ISA Objectives

There are a number of criteria or questions here which we would question the reason for their inclusion. Equally there are important issues not included:

- reduce journey times for commuting? – we would question why this is included. This is often only a short-term phenomenon and there are questions as to why it is a

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<sup>3</sup> Circular for Resource and Waste Professionals, 6 April 2021: <https://www.circularonline.co.uk/news/study-up-to-one-third-of-all-microplastics-released-into-uk-waters-come-from-tyre-wear-particles/>

<sup>4</sup> Media guidelines for reporting road collisions – Active Travel Academy, University of Westminster, May 2021: <https://www.rc-rg.com/guidelines>

<sup>5</sup> Walking and cycling statistics, England: 2019 – DfT:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/906698/walking-and-cycling-statistics-england-2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906698/walking-and-cycling-statistics-england-2019.pdf)

benefit if it leads to longer journeys, creating more pollution. A better metric would be journey reliability as that is in many ways more important especially to businesses

- although it says improve access to transport to jobs, this is not very specific. If the strategy is to level up and address inequality then it needs to focus on providing access to affordable and safe sustainable transport, i.e. active travel and public transport as very often those out of work do not have access to a car. Therefore, this needs to be a specific criteria / question: Improve choice and make non-car modes more attractive and affordable? This is important for the 19% of the region's population who don't have access to a car and the potentially the 43% of households with access to one car which may well disappear to work with the main breadwinner.
- Similarly, under equality, the question: improved affordability of transport? should instead be: improved affordability of public transport (and access to e-bikes)
- Under equality there is no mention of women, yet they are often not properly considered in transport planning and feel least safe on our roads
- Under health, the wording should be stronger on active travel. Rather than will something improve opportunities and access for active travel which is a very low bar to achieve, it should say something like: significantly increase the levels of active travel
- Community safety – again the inappropriate use of and focus on accidents. This should also be aiming to reduce road danger particularly for active travel
- Climatic factors – here or somewhere else should refer to the need to reduce traffic to meet climate targets as moving to alternative fuels cannot happen quickly enough. Evaluation of schemes or programmes should focus on whether they have the ability to reduce carbon emissions in the short to medium term, i.e. quickly, so as not to perpetuate business as usual and complacency on reaching net-zero in many years' time.

## Conclusion

Overall, while the scoping report is reasonably detailed and notes many interactions between various topics, it unfortunately misses several important aspects and its draft objectives are, in places, focussed on the wrong outcomes. As it stands the ISA risks failing to properly assess the full impact of the Transport Strategy and leading to investment in infrastructure and priorities that could make things worse, not better.

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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

254 Upper Shoreham Road, Shoreham-by-Sea, West Sussex, BN43 6BF

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