



Response to:

Making the right choices consultation

**Issues and opportunities for the
Strategic Transport Plan 2025 - 2050**

1 Introduction

- 1.1 Transport Action Network (TAN) welcomes the opportunity to input in to the consultation the issues and priorities for the forthcoming draft strategic transport plan. This is an important moment in time when it is no longer possible to keep putting off difficult decisions and pretending that business as usual is a credible option. We are in a nature and climate emergency, yet to date there has been little evidence that decision makers have taken on board the need for urgent action. The Government has already stated that it is not on track to deliver on its Nationally Determined Contribution (NDC) (under the Paris Agreement) for a 68% cut in emissions by 2030 on 1990 levels. At the same time, we are seeing increasingly severe weather episodes both here and around the world which is causing challenges for existing infrastructure and leading to delays and unreliability, impacting negatively on the economy and people's livelihoods.
- 1.2 The issues and priorities presented in *Making the right choices* unfortunately don't appear to address these concerns, which really should be front and central of any future transport strategy. The final issue not fully addressed is around how the Western Gateway interacts with Peninsula Transport and what are the implications of what happens in Western Gateway on Devon and Cornwall in particular.

2 The Big Issues

2.1 Introduction

2.1.1 Making the right choices has identified three big issues:

- Achieving Net Zero
- Enabling economic growth
- Levelling up the region

2.1.2 At one level these seem reasonable enough, but how they have been presented could lead to them being interpreted in very different ways. That lack of clarity and uncertainty is not helpful, especially when we're facing a climate and nature emergency. Indeed, the most worrying aspect of this document was the lack of a sense of urgency and the need for fundamental change to the way we have done things to date, other than a recognition of the need to move away from fossil fuels.

2.2 Achieving Net Zero

2.2.1 We support this as an issue, but there is a lack of urgency attached to this, not helped by the 2050 date which suggests a long timescale to achieve the change required. That is not the case. The Government has already acknowledged it is off track to meet its

2030 NDC while domestic transport remains the biggest source of emissions¹. There is a pressing need to take urgent action before 2030 and 2035 to significantly reduce carbon emissions. That requires significant investment in sustainable transport measures to enable rapid and significant modal shift.

2.22 While there is an acknowledgement of local 2030 decarbonisation targets, this doesn't appear to elicit any concern about the timeframe and the challenges involved. Equally this section talks about the predicted increase in car use. However, there are no predictions only scenarios for traffic projections, but given these are mostly not compliant with net-zero, they are not that helpful and potentially misleading. The text talks about the need to move away from predict and provide but this is not helped by focusing on congestion along certain road corridors. Instead, it would be better if traffic flows were based on people which could then include public transport and look at capacity across the modes in a more holistic way.

2.2.2 Spending scarce public capital on new roads, which drive emissions in the wrong direction and undermine public transport viability needs to be acknowledged. Any road building needs to be restricted to not increasing capacity and carbon emissions, or undermining modal shift, which is the policy now in Wales². Yet these challenging issues are not even mentioned here in this document. Neither

2.2.3 It is welcome and supported that there is mention of the need for tackling obstacles to more rail freight and for rail electrification, but these need to be a priority.

2.3 Enabling economic growth

2.3.1 While a focus on the economy is warranted, we would like it to be aspiring to a more sustainable outcome. Unfettered growth is causing huge problems, particularly to the natural environment upon which we rely for water, air and food, essential services for life. Therefore, we would like to see this renamed to: Enabling a strong and sustainable economy, to acknowledge it is not just about growth.

2.3.2 Also, 'moving people and goods', doesn't necessarily grow or improve productivity, especially if that involves more car journeys which are an inefficient form of transport within urban areas. This distinction needs to be recognised and that investment in public transport³ and active travel potentially offer far greater returns and should form the basis for new investment.

¹ Page 16, [UK Greenhouse Gas Emissions, Final Figures 2021](#) – Department for Business, Energy & Industrial Strategy, February 2023

² Future road building tests, [Welsh Government Response to the Roads Review](#) – Welsh Government, February, 2023

³ Pages 39 – 41, [Public transport fit for the climate emergency](#) – TUC, April 2023

2.3.3 It is welcome that the paper states: *Using the planning system through higher density and mixed-use development and incorporating transport hubs we can establish sustainable travel from the outset in these proposed growth areas.*

However, while this sounds good, it is vague enough to mean different things to different people and to allow car-based development still to dominate. The location of these developments will be crucial. It is not just about incorporating travel hubs, whatever those might be, for if the development is mostly housing located next to a motorway with easy access to it, putting a transport hub at its centre will likely do little. Most people will drive and any bus services will be severely limited.

2.3.4 New developments need to be located in areas where there are already good public transport links, or the easy and affordable potential to extend them to the site (without a loss of service quality and provision). Sites also need to have walking and cycling prioritised within them and have good active travel links into surrounding areas. Bus services also need to be there from the first day that people move in, not sometime after several hundred families have already set up home and established car-based travel patterns. The key question is can this be delivered, as so far planning authorities are mostly not approving developments like this.

2.3.5 In terms of addressing seasonal traffic, it doesn't seem to make much sense resource wise to increase road capacity just to deal with seasonal peaks. Especially if this creates greater traffic issues within Devon and Cornwall. The priority must be to manage this seasonal congestion by encouraging more people to travel by train and coach to the South West.

2.3.6 The long list of rail issues would tend to suggest the need to prioritise rail investment and the need for more of it, if necessary, switching funding from new roads to rail improvements and renewal.

2.4 Levelling up the region

2.4.1 This is a worthy aspiration but needs to acknowledge that true levelling up, for children and young adults in education, for people who don't drive and need access to friends, family, services, jobs, etc, the focus has to be on active travel and public transport. Anything that doesn't deliver a step-change in provision for this significant marginalised group, is not levelling up. It is not enough to tag some active travel infrastructure on the back of a new road, or the marginal improvement of a bus service. Change needs to be fundamental and that requires looking at transport provision in a completely different way to how it is done at present.

2.4.2 The consultation is worrying light on this subject, compared to the other topics. This issue is also strongly linked to the need for better planning and for placing new development of all types in locations better served by public transport and active

travel. Otherwise, they are potentially excluding a significant minority of the population.

3 What's missing

3.1 Introduction

3.1.1 Apart from the lack of urgency and mention of the nature emergency, there is also nothing about climate resilience and the need for proper maintenance and renewal programmes. Especially in light of the £20 billion backlog in local road⁴ and bridge maintenance⁵.

3.2 Nature Emergency

3.2.1 Given the critical state of nature both in the region and more widely and how it is often negatively impacted upon by large transport infrastructure, particularly new roads, this needs to be a serious consideration. It is not enough to rely on Biodiversity Net Gain as that does not compensate for the loss of irreplaceable habitats such as ancient woodland or veteran trees. Nor does it address increased severance that can result from new roads either.

3.3 Climate adaptation and renovation

3.3.1 It is astonishing that despite the threats facing the transport infrastructure from climate change, adapting existing networks for climate impacts is not raised as an issue. It is perhaps the biggest issue in terms of how we keep our transport networks functioning with increasingly severe and frequent extreme weather events. These events can close or reduce the capacity of roads, shut down railways and cause untold economic damage. Yet the premise of this document is largely business as usual.

3.3.2 There is no point building new infrastructure if the existing infrastructure which it connects to is prone to failure. The priority has to be investing in increasing the resilience of the existing networks so they can withstand extreme weather events which will become more regular, whether it be high temperature episodes, or high intensity rainfall.

3.3.3 Only this year in January, the already dualled A303 near the A36 (Deptford) interchange, was flooded, causing lane closures and delays. This is only likely to increase. Linked to this is the lack of road maintenance on local roads due to the Government's obsession with building new infrastructure while failing to maintain what we already have. The maintenance backlog will likely increase with climate change, unless action is taken now to address this.

⁴ [Annual Local Authority Road Maintenance \(ALARM\) survey](#) – Asphalt Industry Alliance, March 2023

⁵ [Highways magazine article](#) reporting on RAC Foundation / ADEPT survey on bridge maintenance, March 2023

- 3.3.4 However, even more vulnerable potentially, are the Victorian railway lines which were never designed to deal with the levels of flash flooding or heat that they can now be exposed to. This is going to require significant investment to address this to ensure that lines are not out of action for long periods as experienced at Dawlish in 2014. Although, only out of action for 2 months the line closure could have cost the regional economy up to £1.2bn⁶.
- 3.3.5 With a key focus of the future strategy about increasing public transport use and reducing reliance on the car, this will be impossible without a reliable and affordable bus and rail network. Therefore, unless adaptation is made a priority, the strategy risks being nothing more than warm words.

4 Strategic corridors

- 4.1 We are not necessarily convinced by the demand for some of the key corridors, or the suitability of looking at these in isolation for such an oddly shaped region. While there will be some demand for travel to the Dorset coast and the ports there, these are not in the same league as Southampton or Dover and demand in comparison will be relatively light.
- 4.2 The two corridors that extend into the South West, from the Midlands and the South East, cannot really be sensibly planned without reference to the South West and Peninsula Transport. Increasing road capacity, for example, on these corridors might appear to resolve congestion or capacity issues along them (although these will likely be short lived) but could just exacerbate existing problems elsewhere. For example, in the summer, when there is most pressure on these routes, Devon and Cornwall already have severe issues with too many cars swamping local roads and parking facilities. A more strategic approach would be to address safety issues with small scale road interventions, but leave capacity as it is and focus resources on moving people onto public transport and encouraging car-free tourism.
- 4.3 Equally, given the Welsh Government's target for a 10% car miles reduction per capita by 2030, on 2019 levels⁷, will potentially be compromised by increasing the capacity of road infrastructure in Western Gateway. Therefore, any future Western Gateway transport strategy needs to take this on board and focus on public transport investment.

5 Opportunities

- 5.1 There is little to disagree with in the list of opportunities although how these are enacted might change that. For example, while the road network needs improving for

⁶ Railnews: [Dawlish closure 'could have cost £1.2bn'](#), 5 February, 2015

⁷ Page 85, [Net-zero Wales carbon budget 2 \(2021 – 2025\)](#) – Welsh Government, October 2021

all users, if that means increasing capacity for private motor vehicles, that will fuel car use and congestion overall. Focussing on removing bottlenecks will do just this and go against much of what is said in the consultation document. That is not something we could support.

- 5.2 In the section about managing the demand for travel, the shortest of all the opportunities, there is nothing about increasing car occupancy as a way of reducing traffic on the roads. Yet this is prioritised in the Government's Transport Decarbonisation Plan (TDP). In its foreword, Grant Shapps, the Secretary of State for Transport at the time said: *"We want to reduce urban road traffic overall. Improvements to public transport, walking and cycling, promoting ridesharing and higher car occupancy..."*
- 5.3 The Government goes on to state in the TDP that;
- *We will take action to increase average road vehicle occupancy by 2030*
 - *We will publish guidance for local authorities on support for shared car ownership and shared occupancy schemes and services*⁸
- 5.4 The TDP further highlights that: *"Increasing car occupancy and encouraging public transport use are two measures that can immediately cut transport's carbon emissions"*⁹. This gives a clear steer that these are measures that can be quickly progressed and therefore should be prioritised. It is therefore somewhat surprising not to see them mentioned here.

6 Responses to survey questions

1. *Do you agree we have identified the key issues our region is facing?*

See section 2 above.

Are there other issues you think need to be addressed?

See section 3 above.

2. *Please rank the issues in order of what you consider to be the priority in our region.*

Tackling the climate and ecological emergencies need the highest priorities, the clue being in the title: they are emergencies and this needs to include adaption as well. They should be followed by Levelling up and then a strong and sustainable economy.

3. *Do you agree we have identified the right range of opportunities?*

⁸ Page 12, [Transport Decarbonisation Plan](#) – DfT, July 2021

⁹ Page 29, [Transport Decarbonisation Plan](#) – DfT, July 2021

Mostly yes, but see comments in section 5 above.

Are there other opportunities you think we should consider?

Better coordination and integration with land-use planning. Also need to be explicit about the need for traffic reduction and to increase car occupancy (as part of demand management).

4. *Please rank the opportunities in order of your preferred priority.*

Traffic reduction supported by modal shift and demand management should be the top priorities as these will deliver the widest benefits.

5. *Please let us know any other views you have on the issues and opportunities we have outlined here.*

See whole document.

7 Conclusion

- 7.1 Overall, while there are some good statements about the need for better public transport and active travel, it's difficult to see what's new or changed in light of the climate and ecological emergencies. Traffic reduction and demand management are not given the attention needed, while the case for new or bigger roads is still being made. This is despite new roads undermining public transport viability, particularly rail, and causing great environmental damage and social exclusion. This needs to change if the new strategy is to be taken seriously alongside a much stronger focus on adaptation, maintenance and renewal to ensure long term reliability and resilience to safeguard the economy.

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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 and rail services, damaging road schemes and large unsustainable developments

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