

IPSOS-MORI consultation questionnaire on Transport for the North's Strategic Transport Plan ~ Response from Campaign for Better Transport

April 2018

Q1a. *Transport for the North has a vision, which is to establish “a thriving North of England, where modern transport connections drive economic growth and support an excellent quality of life”. For more information see page 12 of the Draft Strategic Transport Plan. To what extent do you support or oppose the vision of Transport for the North as defined in the Draft Strategic Transport Plan?*

We tend to support the vision.

Q1b. *The Draft Strategic Transport Plan has developed four, pan-Northern transport objectives. For more information see pages 12-13 of the Draft Strategic Transport Plan. To what extent do you agree or disagree with the pan-Northern objectives outlined in the Draft Strategic Transport Plan?*

- *Increase efficiency, reliability and resilience in the transport system* **Strongly agree**
- *Transforming economic performance* **Tend to agree**
- *Improve access to opportunities across the North* **Strongly agree**
- *Promote and support the built and natural environment* **Strongly agree**

Q1c. *Please let us know your comments on Transport for the North's vision and/or the four pan-Northern transport objectives. Please indicate clearly in your response whether you are responding about the vision and/or the objectives, and which specific objective(s) your comments relate to (if more than one).*

Vision

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment.

We welcome the important work of Transport for the North in setting out this ambitious Strategic Transport Plan (STP) to deliver transformational improvements to the North's transport connectivity. We support the development of an integrated transport strategy to contribute to long-term economic and environmental sustainability and help close the productivity and prosperity gap compared with the rest of England.

The right transport strategy will not simply pursue economic goals in isolation. It will seek to retain and enhance the good quality of life that is part of the North's attraction to businesses, investors and consumers. It will improve mobility and connectivity, without replicating the errors of suburban sprawl, car dependency, and costly congestion. It will seek to connect and support vibrant modern cities, without undermining the high environmental quality of the surrounding areas. It will support modern businesses through provision for sustainable freight transport. It will see environmental leadership as a

positive outcome rather than a negative constraint, embracing good growth to secure a high quality, low carbon future which protects the natural environment and meets carbon reduction targets.

A high quality transport network is essential to provide access to jobs and services, to support economic activity and to connect communities to the public transport network, integrating rail services, light rail and bus, supported by smart, multi-modal ticketing.

Recognising that all journeys are local at some stage, we welcome the potential for the Strategic Transport Plan to provide a framework for not only cross-regional provision, but to work with local and metropolitan transport authorities to provide a quality framework, encouraging a levelling up of the local service provision on which many journeys depend.

Objectives: Efficiency, reliability, and resilience

We strongly welcome the emphasis on making best use of existing transport networks; on improving travel choices and user experience; on co-ordination and integration of strategic transport provision with local networks; and on increasing resilience in the face of climate change.

We would extend the emphasis on making best use of existing networks to make a presumption against new road building. The evidence of studies over many years is that building new roads generates new traffic without long-term relief of congestion, adds pressure to the rest of the road network and increases maintenance costs. The environmental cost is permanent, while economic benefits are unproven. Consequently, road building should be the option of last resort.

Achieving resilience in the face of climate change requires not only robust and well-maintained networks but also action against the causes of climate change. The UK Committee on Climate Change reports that for the transport network to meet its obligations requires electrification of fleets and networks, and a 5 per cent cut in road transport movements above baseline predictions.

We look to the Strategic Transport Plan to set the framework for such necessary reductions in road traffic to be supported through reduction of the need to travel, improved access to and choice of alternative transport modes, and better coordinated demand management measures.

Objectives: Transforming economic performance

We support the principle of investing in transport to support productivity and agglomeration in economic centres, while noting that for many centres, transport within (rather than between) city regions will be the priority.

It is important that economic performance is not pursued in isolation, and that environmental and social goals are given equal priority, to deliver a robust and sustainable transport strategy. Without embracing carbon reduction as a goal of the STP instead of a constraint upon it, there will be a conflict in expanding travel while reducing carbon emissions.

Social trends such as the growth in flexible and part-time working, the fall in car ownership and declining take up of driving licences all indicate that moves away from car dependency would be the best long-term investment. Expanding the use of rail freight is one way to boost economic activity with much lower environmental and maintenance costs than from HGV traffic.

Objectives: Improving access to opportunities across the North

We strongly support the principle that the transport network should enable better access to key opportunities for all, regardless of age, income level and mobility, and the commitment to inclusive growth, supporting health and wellbeing and affordable transport access.

We believe the plan should make an explicit commitment to deliver these goals through improved public transport at pan-regional level, and through support and integration of local transport (including rail, light rail, bus and cycle networks) and to move away from car dependency.

The experience of the Local Sustainable Transport Fund is that packages of small scale interventions are highly effective in connecting people to jobs, and deliver excellent value for money. Such packages should be prioritised and supported through the TfN strategy, helping deliver good quality end to end journeys and better integration with local networks.

Objectives: Promote and support the built and natural environment

We strongly support the high priority given in the strategy to protecting the environment, including specific commitments to promote sustainable travel options, support low carbon growth, and ensure that sustainability impacts are a key consideration in option selection for new infrastructure.

As part of the evidence base for the plan, we worked with TfN and a wide range of environmental and sustainable transport organisations in the North to identify key challenges and opportunities, including the potential for green infrastructure to be designed in to transport provision and the need to protect designated landscapes from harm.

There are opportunities for TfN to be a leader in moving to a low carbon future, through programmes of rail electrification and modal shift (such as Park & Ride infrastructure and support for reductions in city centre parking provision) away from motor vehicle use, bringing economic as well as environmental benefits.

It is important that the STP contributes positively to meeting carbon emission and other mandatory environmental targets, and for the Integrated Sustainability Appraisal to provide a sufficiently robust framework, including challenging the assumption that investment in greater road connectivity is the best or only way to deliver social inclusion or economic growth. Currently this support for new road building within the strategy, such as Highways England's highly damaging proposals for the A5036 Port of Liverpool Access Road or for road widening in the Peak District National Park, are entirely at odds with this and other objectives.

Q2a. *The 'Why' section of the Draft Strategic Transport Plan sets out the approach and process for developing Transport for the North's programmes of work. For more information see pages 18-20 (which present the rationale for a spatial approach) and pages 24-25 (which forecast future transport demand) of the Draft Strategic Transport Plan. To what extent do you support or oppose the process which has been followed to develop the Draft Strategic Transport Plan?*

Tend to support

Q2b. *The Draft Strategic Transport Plan identifies at least three main roles which transport can play to help to drive the economy and deliver the transformational change required. These are Connecting People, Connecting Businesses and Moving Goods. For more information see pages 30-35 of the Draft Strategic Transport Plan. Please let us know your comments on the three main roles which transport can play to help drive the economy and deliver transformational change, including if there are any other roles which should be considered alongside these. Please indicate clearly in your response which specific role(s) your comments relate to.*

Connecting people

We strongly support the focus on rail for connecting people to jobs and services, and the need identified in the plan for increased rail capacity and enhanced rail interchanges.

While recognising the potential for strategic park and ride facilities, we are concerned that these must be carefully located to minimise adverse environmental impact and be part of a strategy to reduce car-miles. Park and ride facilities should also be coordinated with the removal of city centre car parking to ensure that the benefits are properly captured. Otherwise they will just represent an increase in car parking and little long term benefit will be realised. Removing city centre car parking spaces will not only free up local roads and reduce congestion, it will also provide redevelopment opportunities and greater economic benefit from key sites.

Bus services are a vital part of the network, particularly for lower income and more isolated communities not served by rail. Buses cut congestion and Euro6 buses are far less polluting than the equivalent class of cars.

We strongly welcome the recognition of potential to improve connection with cycle networks. Cycling brings multiple benefits, cutting pollution and congestion, promoting health and well-being, reducing social and economic isolation, and provision for cycling helps supports the local economy and the tourist trade.

Overall the STP aims are good although it needs to show more strongly how some of its outcomes, particularly around new roads, would meet its own environmental objectives.

Moving goods

We strongly welcome the statement that reducing carbon emissions is now imperative and the commitment to work to deliver the clean growth strategy. It is particularly disappointing therefore to see the emphasis on road freight as the dominant mode, given the great potential for rail freight and multi-modal freight interchanges to move high volumes at far lower environmental costs.

There is a strong environmental and efficiency case for boosting the use of rail freight. Rail freight produces 76 per cent less CO₂ per tonne carried than the equivalent road journey. Fully laden HGVs are 160,000 times more damaging to road surfaces than the average car. Transferring 2000 lorry loads a day to rail would be the equivalent of taking 8000 cars off the road. Making greater use of rail freight for moving goods between cities would complement the good work done by local authorities in encouraging smarter last mile solutions, such as local consolidation centres, greater use of shared delivery vehicles, and low carbon options such as electric vans and cargo bikes.

The plan states that road freight is “inherently less expensive” than rail. This ignores the external costs from HGV traffic which fall on local authorities, residents and businesses. Currently rail freight may be seen as less viable because of the lack of a level playing field between HGVs and rail. HGVs pay only a third of external costs, including road infrastructure, congestion costs, and pollution and collision costs. There is a high probability that some form of distance based charging will come into place in the lifetime of the STP. It would be more prudent and sustainable to embrace the full potential of rail freight and prioritise interventions to deliver it.

We would like to see greater emphasis in the STP on the need to allocate and deliver sites for rail freight interchanges and terminals, without which significant demand for rail freight will continue to be suppressed and its considerable benefits unrealised. There is a need for more transshipment points both large (strategic Rail Freight Interchanges SRFIs) and medium and small terminals. More aggregates terminals are needed in cities to supply the many construction projects that the region’s economic transformation will stimulate.

Q3a. Northern Powerhouse Rail aims to significantly improve capacity, frequency, speed, and services between the North's main economic centres. For more information see pages 44-47 of the Draft Strategic Transport Plan. To what extent do you agree or disagree with the emerging vision for Northern Powerhouse Rail as shown on page 45 of the Draft Strategic Transport Plan?

Tend to agree

Q3b. The Long Term Rail Strategy aims to improve train services, stations and lines on the wider rail network. It defines a series of five 'themes', each addressing one or more of the key gaps preventing the current rail network from delivering the pan-Northern transport objectives. For more information see pages 48-52 of the Draft Strategic Transport Plan, and the accompanying Long Term Rail Strategy published alongside the Draft Strategic Transport Plan. To what extent do you agree or disagree with the aims and objectives of each of the five 'themes', as outlined on page 50 of the Draft Strategic Transport Plan?

- Connectivity **Strongly agree**
- Capacity **Strongly agree**
- Customer **Strongly agree**
- Community **Strongly agree**
- Cost Effectiveness **Strongly agree**

Q3c. The Major Roads Network for the North (along with Strategic Road Studies) aims to improve the reliability, efficiency, quality and resilience of the North's road network. For more information see pages 54-57 of the Draft Strategic Transport Plan. Transport for the North and its Partners have identified a Major Road Network for the North, which includes roads managed by local transport and highways authorities and also those managed by Highways England (such as Motorways and A-roads). This approach is based on the principle that the last mile can make all the difference as to whether goods or people arrive on time and/or as efficiently as possible, and so management and investment of this Network is a priority. To what extent do you agree or disagree with the development of a 'Major Road Network for the North'?

Neither agree nor disagree

Q3c2. To what extent do you agree or disagree with Transport for the North's focus on 'the last mile' as a means to improve the overall reliability, efficiency, quality and resilience of the North's road network?

Strongly agree

Q3d. Integrated and Smart Travel aims to improve the experience for people using public transport across the North. For more information see page 58 of the Draft Strategic Transport Plan. How important or not do you think Integrated and Smart Travel is to delivering the four key programme objectives, as outlined on page 58 of the Draft Strategic Transport Plan?

- Enabling economic growth in the North **Very important**
- Improving customer experience **Essential**
- Increasing efficiency across the transport network **Essential**
- Providing a consistent and familiar travel experience throughout the North **Essential**

Q3e. Seven 'Strategic Development Corridors' have been identified to help inform major strategic transport interventions. For more information see pages 60-61 of the Draft Strategic Transport Plan. Do you agree or disagree with the approach to how the Strategic Development Corridors have been identified, as outlined on pages 60-61 of the Draft Strategic Transport Plan?

Neither agree nor disagree

Q3f. *Please let us know your comments on Transport for the North's identified work programmes as set out in the Draft Strategic Transport Plan. Please note at this stage we are not seeking feedback on specific infrastructure projects themselves – an opportunity will be given on a project-by-project basis when such projects are brought forward and developed.*

Northern Powerhouse Rail

We agree that a step change in rail connectivity between the North's largest cities is both necessary and possible.

We support the goals of Northern Powerhouse Rail, to improve capacity, frequency and speed of services across the region, and to make best use of planned HS2 provision to maximise local rail connectivity.

We support investment in Trans Pennine rail upgrades for both passengers and freight. We note that the Feasibility and Route Studies undertaken by the then Highways Agency and Network Rail in advance of RIS1 stated that because of the sensitive nature of the Pennines and the National Park, upgrading rail was the best solution.

Logistics is a key growth sector for the region and rail freight has great potential to meet this growing demand. This Strategy correctly identifies the constraints of the current rail network and recognises the benefits of rail freight over road and air. Long distance consumer traffic and construction traffic are both expanding but are constrained by a lack of capacity on the rail network. We look to the STP to address key pinch points and junctions on the rail network to meet this demand for rail freight capacity while also meeting demand for expanded passenger services.

To be effective, the investment in routes must be complemented with rail electrification, upgrades in rolling stock and the rollout of smart ticketing, with new services fully integrated with national rail operations and with local services.

Long Term Rail Strategy

We strongly welcome TfN's commitment to a Long Term Rail Strategy and its aim to deliver high quality rail services right across the North, with more frequent and better integrated services, faster journeys and improved reliability, on modern trains with high quality facilities, alongside an efficient and attractive rail freight offer.

Our 2015 report, Stepping Stones, called for the development of a clear 'regional InterCity' network of services for the North that could be marketed as a frequent and high quality option for journeys between key cities, with quality connections to intercity services to London and elsewhere. In our Right Track North charter, we called for a long term programme for further additions to rail capacity, including improving evening and weekend capacity, and options for future East-West capacity increase and a "Northern Hub 2" around West Yorkshire. We welcome the potential of the STP to deliver this vision.

Local passenger services also have a vital role to play in contributing to a well-connected rail network. For example, additional capacity around Leeds would allow much better and more frequent services across the city and also create greater capacity for longer distance passenger and freight services.

There is a strong case for extending the existing rail network, with additional stations and lines serving new developments. Some of these have already been identified in the STP – in fact the approach taken by TfN is essential in considering missing links in the rail network such as Skipton-Colne, where the benefits are only fully identified through considering the contribution it can make to improving strategic Trans-Pennine connectivity for passengers and freight. Local authorities and others have also identified a number of other potential extensions to the rail network, such as Harrogate-Ripon-Northallerton,

reinstatement of the Leamside branch and also more local connections such as passenger services on the Ashington, Blyth and Tyne line and a rail extension to Skelmersdale. These and other examples are included in our report 'Expanding the Railways' (2017).

On freight, the Long Term Rail Strategy has the right aims and the text is supportive of rail freight but this will need to be translated into specific rail freight enhancement commitments, for which there is a strong socio-economic case.

Research commissioned by Campaign for Better Transport shows that upgrading the existing rail lines which run parallel to key congested motorway routes would allow large numbers of lorry loads to be transferred to rail, easing congestion, improving air quality and reducing road collisions. The research examined the socio-economic benefits of upgrading existing rail lines.

One case study looked at the M6 motorway, which has over 13,500 of the largest HGVs a day on certain sections. Transferring 2000 HGVs, equivalent to up to 8000 cars, from the M6 every day to rail would significantly improve road conditions without needing to add extra road capacity and would reduce nitrogen oxide emissions by 10 per cent and particulates by 7 per cent per corridor. The STP should embrace the potential for such upgrades as part of the Long Term Rail Strategy.

Key locations for enhanced rail freight capacity are the northern Trans-Pennine route; south Trans-Pennine route along the corridor of the existing Hope Valley line between Sheffield and Manchester via Stockport, especially for construction materials, as well as the West and East Coast main lines, both within the TfN region and connecting beyond it. Promoting rail freight, especially to the northern ports, will also help give business choices in how to move goods around and can cut lorry traffic, and help the development of those ports.

The Major Roads Network for the North (along with Strategic Road Studies)

We accept the case made by the Major Road Network report produced by the Rees Jeffreys Road Fund for a co-ordinated approach to major roads that serve more than one local authority area. Transport for the North is well-placed to provide such co-ordination in partnership with local authorities. However, we strongly support the principle of a co-ordinated transport network, not a road network in isolation. There needs to be a much stronger focus on traffic reduction as this is far more likely to deliver the long term benefits and aspirations being sought in this strategy. Solving road problems such as congestion is rarely achieved by investing in more roads. Focussing on moving people and goods by the most efficient and sustainable means, rather than moving vehicles on roads without reference to other modes, is the best way to deliver a truly co-ordinated network.

It is sensible to improve co-ordination between local regional and national bodies, to deliver a truly integrated transport system. Such co-ordination could contribute to providing high quality door-to-door travel, and making best use of technology to join up services, cut congestion and support sustainable growth. We welcome the integrated approach taken by the M60 North West Quadrant strategic study, and urge that this is complemented by better integration between Highways England and TfGM traffic information systems. We are strongly supportive of a pilot project for such integration currently being developed to make best use of existing roads and as a positive alternative to major new road capacity.

We strongly agree that the proposed Trans Pennine Tunnel was not a feasible option and we welcome the move to drop such a costly and damaging road scheme. However we are not persuaded that any major upgrade of Trans Pennine road capacity should be a priority. We would prefer to see Trans Pennine rail investment for both passenger and freight sequenced first, before committing to increased road capacity.

Cities across the region are working to cut traffic, promote public transport, improve air quality and enhance the public realm: expanding inter-city road traffic will undermine these moves and divert investment from rail and local transport.

We are concerned that projects like big new bypasses and road widening will neglect the most important priorities and could make transport conditions worse. The experience of road building projects is that they provide only a temporary relief to congestion, but permanent environmental damage. We are very concerned about Highways England proposals for the Port of Liverpool Access Road which will destroy a country park and where alternatives, including a tunnel option, have not been properly considered.

We would like to see the strategy include smaller schemes that could help the existing roads work better, and contribute to important environmental goals, by cutting overall traffic. A package of good maintenance, sustainable design, better integration with other modes, and demand management would help deliver a responsible low carbon future. While local transport is the remit of local highways authorities, there needs to be a strong strand within the STP that prioritises and finds funding for local sustainable infrastructure across the region.

We believe the priorities for the Major Road Network should be maintenance, including safety measures; integration, with a truly multi-modal approach; and environmental leadership, including a serious commitment to CO2 reduction and demand management, with any new road capacity a last resort. Examples for improving existing roads are included in our reports *Rising to the Challenge (2017)* and *Roads and the Environment (2018)*.

We note that shifting freight from road to rail would improve the performance of the road network. Road and rail complement each other; if more long distance freight can be transferred to rail the existing road based freight becomes more reliable. Such a move would also make an important contribution to road safety. Except for motorcycles, HGVs have the highest rate of involvement in road crashes leading to death and serious injury on motorways and are almost seven times more likely than cars to be involved in fatal collisions on minor roads.

We support the principle of focusing on efficient last mile transport for goods and people. We believe this is best served by multi-modal provision, with high quality integrated public transport, walking and cycling for people: and with smart last mile logistics for goods.

Integrated and Smart Travel

We strongly support moves to integrated and smart travel. An effective transport strategy will recognise that people make end-to-end journeys by a mix of modes, and make travelling by sustainable modes as easy as possible.

TfN's commitment to roll out smart ticketing across the region has potential to transform both the range and quality of travel choices for users and the ability of transport providers to better plan, deliver and manage services.

The Strategic Development Corridors

We welcome the multi-modal approach to scoping future infrastructure investment, and the corridor-planning approach as opposed to looking at one mode in isolation.

We would like to see the STP set this in the wider context of the sustainable transport hierarchy: prioritising travel demand reduction, modal shift and efficiency improvements, with any capacity increases designed to provide for the most efficient forms of transport first.

On this basis, investing in more digital connectivity to reduce the need to travel; and investing in better connectivity within city regions would be greater priorities than strategic corridors for sustainability and a transformed Northern economy.

We recognise there is a need to improve some key routes. In general, we favour rail-led schemes as delivering higher capacity, and greater inclusion, at lower environmental cost than road-led schemes. We reserve the right to make comments on individual schemes as these come forward.

Q4a. *The final chapter in the Draft Strategic Transport Plan presents seven strands which explain how Transport for the North's Investment Programme could be delivered. To what extent do you think each of the seven strands listed are important to deliver Transport for the North's Investment Programme?*

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|---|-----------------------|
| • Governance and accountability (see pages 78-79) | Very important |
| • Stronger partnerships (see pages 80-81) | Essential |
| • Innovation (see pages 82-83) | Very important |
| • Northern transport skills (see page 84) | Very important |
| • Funding and financing (see pages 85-87) | Essential |
| • Appraisal and analysis (see pages 88-89) | Essential |
| • Ensuring a sustainable Investment Programme | Very important |

Q4b. *Please let us know your comments on the seven strands below. Please comment on any other delivery strands which are not included in the list currently.*

Governance and accountability

We welcome TfN achieving its statutory powers. We support a transparent and participatory model of decision-making, with TfN sharing information with all stakeholders and being accountable to democratically elected authorities.

Stronger partnerships

We strongly welcome the emphasis on stronger partnerships, particularly around better integration with local transport, and better joining up of transport and spatial/land use planning: we believe both of these should be more prominent in the plan's vision and delivery programme.

Both these points were key themes emerging from the engagement exercise we conducted with environment and transport groups in the development of the STP.

Participants repeatedly stressed that while long distance networks are important, long distance journeys are much less so; most journeys are local or intermediate, including journeys to work, and inter-city journeys are already easier than some regular journeys between different suburbs in the same city region. It is vital that the STP does not lose sight of the importance of local services and the need to connect strategic and local infrastructure.

Having a clear view on spatial planning priorities, and where appropriate influencing these to locate development near transport hubs, will be crucial in delivering sustainable growth and supporting economically beneficial agglomeration, rather than recreating the problems of ribbon development and suburban sprawl.

Innovation

We welcome the commitment to invest in innovation, particularly in data sharing for better transport planning by both individuals and organisations; investment in the digital railway which has the potential to transform network performance while reducing its environmental impact; and better broadband, reducing the need to travel.

We recognise the importance of electric vehicles, alongside road traffic reduction, in meeting CO2 reduction targets. We urge that planning for autonomous vehicles does not dominate or distort the strategy, as a fully automated road traffic fleet is a very distant prospect.

Northern transport skills

We welcome the recognition that transport investment not only unlocks economic activity but is an economic activity in its own right, creating skilled jobs, with particular potential for rail engineering, rolling stock, and electric vehicles.

Funding and financing

We recognise and agree the need for significant funding for TfN to deliver its vision. We support the principle that the North should receive a fair proportion of Government capital grants and VED revenue. Introducing some form of road user pricing so that the external costs from road traffic are appropriately charged would be a more sustainable future alternative to VED.

We also support moves to capture the uplift in land value from transport investment. We advocate having a joined up strategy with local authorities on S106 and CIL contributions, recognising that affordable public transport is as important as affordable housing for sustainable development, and ensuring that the uplift in value that developments gain from having good transport links is appropriately captured.

We also note the potential of schemes such as Workplace Parking Levies to generate a sustainable income stream for public transport investment, as demonstrated in Nottingham, which could complement TfN's investment.

We support the general principle that TfN should get more powers and freedoms, within a framework of strategic duties, including future powers to raise money for example tax-incremental financing, as used in Manchester to fund the Metrolink extensions, or regional investment bonds.

Appraisal and analysis

We strongly support the aspiration in the STP to have an approach to appraisal that serves the North and will enable delivery of TfN's positive rail-led and socially inclusive vision.

We have criticised traditional transport appraisal for a 'predict and provide' approach, which gives too much weight to small time savings by motorists, underestimates the economic benefit of public transport, and gives insufficient weight to wider impacts on the environment, society, public health and the quality of life.

Highly successful passenger rail and light rail projects such as upgrading Borders Rail or building London's Docklands Light Railway went ahead despite not meeting traditional appraisal criteria. Rail freight is under provided for, despite the strong benefit cost ratios for rail freight enhancements, typically in the range of 4:1 to 8:1, highlighted in the latest Network Rail Route Strategic Plan. This should be factored into investment planning.

We are encouraged by the range of factors that are being considered in the STP, including demographic change, the reduction in number of trips, and the impact of spatial planning decisions on travel demand, and by the development of regional models to inform strategy development.

Increased use of scenario planning is welcome. The declining numbers of trips falls in car ownership and falls in take-up of driving licences are confirmed in the latest National Travel Survey. Combined with national and local planning policies that seek to locate homes and jobs close to transport hubs, this

indicates that investing in additional road capacity is neither a necessary nor a desirable response to a growing economy.

We welcome consideration of employment effects from new transport connections: the evidence is particularly strong in terms of the economic benefit of new railway stations and from public transport linking people to jobs. We also welcome the move towards looking at land use change and reflecting this in appraisal.

The ISA correctly identifies that the different scenarios for future development of the STP have greatly varying environmental impacts: in particular the fourth scenario (Dispersed and Travel Friendly) is identified as having negative implications for rural landscapes, loss of greenfield sites, soil and water contamination, and congestion in urban centres, and would make enhancing lower carbon, affordable transport choice more difficult as well as being least resilient in the face of climate change. We urge TfN to act on this, reject scenario four, and embrace the more positive scenarios which join up transport and planning for a sustainable future.

The Strategy is an opportunity to replace 'predict and provide' with 'decide and provide', by setting out not only what is possible but also what is desirable, and to prioritise those interventions that support the most desirable outcome. We urge TfN to pursue its own appraisal approach that will meet the real needs of the region.

Ensuring a sustainable Investment Programme

We strongly welcome the approach set out in the STP, in particular the emphasis on sustainable procurement and the circular economy, building in accessibility, and contributing to the Government's Clean Growth Strategy and 25 Year Environment Plan.

We urge a more explicit commitment to use green and blue infrastructure, rather than simply exploring opportunities for their use. There are many good examples of green infrastructure projects, for example the sustainable verge management pilots with local Wildlife Trusts on stretches of the SRN in South Yorkshire and North Lincolnshire (M18, M62 and M180) and the green bridges included on the A556 Knutsford to Bowdon link road.

We note that to achieve sustainable development, there needs to be a stronger commitment to maintenance as well as capital investment in new infrastructure.

It is important that the STP contributes positively to meeting carbon emission and other mandatory environmental targets, and for the ISA to provide a sufficiently robust appraisal framework, including challenging the assumption that investment in greater road connectivity is the best or only way to deliver social inclusion or economic growth.

The greatest sustainability challenge we face is climate change; the strategy as a whole should have clear targets for CO2 reduction, including milestone targets to achieve its goals, with a carbon cap for the strategy as a whole, and the potential for a carbon veto on individual projects that would lead to increased rather than reduced CO2 emissions.

Q5a. *To what extent do you agree or disagree with the following statement? 'Overall, the Draft Strategic Transport Plan will give businesses the confidence to invest in the North over the coming decades'*

Tend to agree

Q5b. *Overall, to what extent do you support or oppose the Draft Strategic Transport Plan in its current format?*

Tend to support

Q6a. *Please provide any comments you have about the Independent Integrated Sustainability Appraisal, and its objectives, in the box below.*

We welcome the preparation of a thorough ISA and the positive approach taken to engaging stakeholders in commenting on its early scope.

Following our work with environmental stakeholders considering the scoping report on the draft ISA, we reported the following conclusions.

- 1) There was a desire to see the ISA objectives comprise more than a tick box checklist: instead providing a coherent sustainability challenge to the STP as a whole.
- 2) Carbon reduction was seen as the critical objective by which the STP as a whole would be judged.
- 3) Stakeholders want the ISA to ensure that that STP actively addresses key environmental challenges on carbon emissions, air pollution, land use and biodiversity, while delivering smart growth, inclusive local connectivity and support for active travel.
- 4) Overall there was support for the objectives proposed in the ISA but respondents wanted to see these underpinned by stronger questions, with the test being not whether the STP would support these objectives but whether it would deliver them.

The clear objectives for the ISA are welcome as are the opportunities identified in Table 7.1 of the ISA, including the statement that the STP “should seek to reduce emissions as a core element” and “should ensure new schemes maximise opportunities to absorb carbon dioxide and other greenhouse gases”, in support of the objective to “reduce greenhouse gas emissions from transport overall, with particular emphasis on road transport”.

We also welcome the clear objectives on protecting biodiversity and habitats, and on promoting sustainable transport choices. We agree that “the Plan should minimise dependence on the private car... should increase travel by train into and between cities... freight movements to be encouraged away from road network... Integrated transport infrastructure (including ticketing) should be encouraged... The Plan should create infrastructure to encourage people to switch to low emission vehicles”, in support of the objective that overall that the STP should “enhance lower carbon, affordable transport choice”.

The ISA correctly identifies that the different scenarios for future development of the STP have greatly varying environmental impacts: in particular the fourth scenario (Dispersed and Travel Friendly) is identified as having negative implications for rural landscapes, loss of greenfield sites, soil and water contamination, and congestion in urban centres, and would make enhancing lower carbon, affordable transport choice more difficult as well as being least resilient in the face of climate change.

This analysis helps provide the sustainability challenge needed to the STP. We note that the ISA report says “it is not the purpose of the ISA to decide the alternative to be pursued” and so it remains to be seen how the ISA will be applied in practice.

The test for TfN will be the extent to which those proposals in the STP, such as new road building, that appear to be at odds with the ISA objectives, will go ahead, or whether the ISA will enable such schemes to be vetoed on environmental grounds.

Q6b. *To what extent do you agree or disagree that a robust assessment of the Draft Strategic Transport Plan has been undertaken by the Independent Integrated Sustainability Appraisal?*

Tend to agree

Q7. *What, if any, additional comments do you have that are relevant to this consultation on both the Draft Strategic Transport Plan and/or the Independent Integrated Sustainability Appraisal, that you would like to make?*

We endorse the 10 Core Responses from environmental transport organisations, which reflect the priorities identified in our work with stakeholder groups in the development of the STP.

We strongly support the development of a Pan-Northern Transport for the North strategy to contribute to long-term and overall sustainability, particularly by integrating economic growth with carbon reduction and by reducing economic and social divergence.

We support the potential of the STP to deliver transformational economic growth and that this uplift can and should be achieved sustainably in relation to its environmental and social impacts.

We agree with the Independent Economic Review that for the to be effective, transformational improvements to the North's transport connectivity must be within cities as well as between them, and must be integrated with city-region local public transport networks, which are joined-up with wider networks, involving frequent rail services, light rail and bus, all supported by smart, multi-modal ticketing.

While noting the different future scenarios identified, we believe the STP should not simply attempt to accommodate uncertainty, but should pursue interventions that contribute to the most sustainable trends, including reducing the need to travel through better digital connectivity, and supporting agglomeration by aligning transport and spatial planning objectives.

We strongly support the proposed major investment in rail infrastructure and improved and the commitment to roll out pan-Northern smart ticketing. However we do not support major investment in new road schemes: facilitating more and longer road journeys is not in itself an economic benefit and will have adverse impacts on local networks.

We believe the STP should have an explicit carbon reduction objective and target, with a carbon cap for the plan and potential carbon veto on individual interventions. It should include a strengthened commitment to protect National Parks, AONBs, designated wildlife sites, ancient woodlands, and other protected sites from damaging infrastructure development, recognising that the natural environment of the North is one of the region's key assets.

Getting transport right is not only vital for the sustainability of the transport system but is also central to addressing the challenges the North faces now and in the future. Breaking the false link between economic growth and traffic growth is central to the North having a sustainable future, enabled by investment in affordable, reliable, accessible public transport for all.

April 2018

Bridget Fox
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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