

Transport Action Network

Response to:

Western Gateway:

Draft Transport Strategy 2020 – 2025

consultation

Introduction

Transport Action Network (TAN) is generally supportive of the development of regional transport strategies which can help provide a more strategic overview to transport provision in a given area.

We recognise that this transport strategy is focussed on the short term with the aim to develop a longer-term vision up to 2050 by March 2023. It also appears to have evolved from existing transport strategies at a local level and therefore would appear somewhat constrained by what is contained in these. That said though it is helpful to have this set out in one place and it is important to explore whether existing policies and strategies remain fit for purpose in light of the recent experiences from lockdown and the climate emergency.

Indeed, in the introduction, it is stated that:

All improvements identified will include the overarching need to decarbonise the transport network in line with the government's emerging Transport Decarbonisation Plan. Due to the scale of this challenge the STBs are in a better position to take strategic leadership of this matter on behalf of its local authority members.

On page 7 the draft strategy also states:

To maintain the quality of our environment it is vital to consider transport improvements appropriate to their setting, which also does not diminish the quality of life and the characteristics of our built and natural environments.

We also welcome the fact that the impacts changes arising out of coronavirus have been reflected to some extent within the strategy, particularly around giving a higher profile to cycling.

The one thing that is not clear is how stakeholders, including the voluntary sector and local residents will be included in the strategic partnership groups that will be set up to aid the development of the longer-term plan up to 2050. This is something we would urge Western Gateway to correct and is something we may be able to help with, certainly around local transport groups.

Key Concerns

Our key concerns with the strategy are:

1. Lack of clear strategic vision to decarbonise transport in the region
2. The vision that is provided lacks any assessment as to its likely effectiveness (pages 16/17) – it's not enough to talk about decarbonisation, it has got to be embedded in every policy and action
3. The large number of significant road schemes, over 20 in total is an investment in carbon intensive infrastructure that the Committee on Climate Change has said we need to change. It will increase carbon emissions at a time when we need to be rapidly reducing them. The road schemes will also impact negatively on the region's nationally and internationally important environmental and historical assets.
4. The lower number of sustainable transport schemes, which in an era of decarbonisation would be expected to be in the overwhelming majority. Instead only around 13 significant sustainable transport schemes are listed.
5. The failure to recognise the role of digital connectivity in helping reduce the need to travel and that it requires significant investment

The Committee on Climate Change in its latest progress report to Government¹ specifically stated that:

¹ [Reducing UK emissions, Progress Report to Parliament](#), Committee on Climate Change, June 2020

Investments in new long-life high-carbon infrastructure could lock in high global emissions for years to come. (p130)

The recovery package must also avoid taking actions that would lock in high emissions or high-carbon activities. (p157)

However, our main objection to this strategy is that despite the fine words about decarbonisation and modal shift, there is little of substance within the strategy to turn this into a reality. Some of the sustainable transport proposals will no doubt have a positive impact but how well they will succeed in achieving modal shift is questionable when at the same time there are so many road schemes increasing capacity. There is a real danger that the expansion of the road network will increase traffic and swamp any shift to more sustainable modes. In fact, it's likely to undermine it.

The key thing is that there is no assessment at the strategic level of the carbon and other impacts that this plan will have. There appears to be no Strategic Environmental Assessment to provide feedback on the proposals which are likely to increase carbon. The issue is that short-term actions are incredibly important in ensuring that carbon from transport is rapidly cut, especially since transport is the stand out sector in having failed to reduce emissions of any note since 1990.

By focussing on so much road building, the plan is locking in large amounts of carbon for construction and during operation. Despite the drive to electrification, most of the cars on the road in 2030, or 2032, will still be driven by an internal combustion engine. Even the Department for Transport has recognised in its consultation on the Transport Decarbonisation Plan that we need to use our cars less². Research commissioned by Friends of the Earth highlights how we will need traffic reduction between 20 – 60% by 2030 depending on how quickly decarbonisation happens elsewhere³. Yet none of this manifests itself in the strategy other than being talked about at a superficial level.

Even then the words can be quite weak, talking of “minimised increase in car-based travel” (page 20) rather than the decrease necessary. While ambitions for cycling are weak when considering access to public transport, only suggesting it for the first and last mile (pages 16 & 19). This might be appropriate for walking, but for cycling it should be up to the first or last 5 miles and with e-bikes this could be even further. E-bikes barely feature in this strategy yet recent research suggests they could be significant in decarbonising transport⁴.

In terms of solutions which have been overlooked, this strategy still focusses on the physical transport infrastructure, unlike other regions, such as England's Economic Heartland (EEH), which are looking far more seriously at connectivity, rather than mobility. Western Gateway needs to consider where investment in faster and rural broadband could reduce the need to

² Page 3, [Decarbonising Transport: Setting the Challenge](#), Department for Transport, March 2020

³ [More than electric cars](#), Friends of the Earth, February 2019

⁴ [E-bike carbon savings – how much and where?](#), CREDS, University of Leeds, May 2020

travel, reduce isolation and improve the local economy. This is something the Committee on Climate Change stated in their 2020 report:

We should ensure that home working remains a widespread option; higher investment in resilient digital technology including 5G and fibre broadband should therefore be prioritised over strengthening the roads network. (page 152)

Western Gateway's digital technology policies are purely focussed on enabling or improving travel, not how it might help reduce travel. This is a major omission and a missed opportunity to achieve modal shift.

Finally, we are concerned that the strategy is being used to unlock significant development in the region. Given its focus is on road building, this will only compound the issues around increasing traffic and pollution.

Conclusion

Despite the fine words on decarbonisation and protecting the region's environmental and historic assets, the significant focus on road building undoes all of this at a stroke. The strategy will increase traffic and emissions at a time when we need rapid cuts, while also damaging internationally important sites. To address this there needs to be a much stronger focus on traffic reduction and decarbonisation.

As it stands, this strategy is not one we could support or believe is fit for purpose and would urge Western Gateway to reconsider the haste at which this is being adopted with curtailed public involvement.

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Chris Todd

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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

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