

Midlands Connect Refresh Response

CPRE East Midlands and West Midlands Regions

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Introduction

CPRE welcomes the opportunity to comment on proposals to refresh the Midlands Connect strategy. This response has been prepared by the West Midlands and East Midlands CPRE regional groups, along with Gloucestershire CPRE.

Our response is based on the two documents published for the consultation, the Refresh Document and ‘Summary’ document. However, we also note that the text of the two documents often differs substantially on key points and that there is a lack of substance. So, for example, the summary document lists seven key rail schemes. No information is given (let alone further detail) in the main document for most of these.

The summary also details a number of specific road proposals on the MRN, the details and purpose of which are not set out in the Refresh Document. Yet, the questions ask consultees to comment on precisely which schemes should be progressed in the short term.

Unfortunately, this reflects a continued issue with Midlands Connect consulting on proposals without providing the appropriate level of consistent information and we would urge Midlands Connect to review their approach to consultation material.

It is also unclear how this Refresh relates to the ‘Alternatives Futures’ report by Midlands Connect (2020) which used a scenario, rather than an output, approach and which suggested a new, and in our view, welcome approach from Midlands Connect.

We acknowledge that the Refresh includes a significant move towards advocating a more integrated approach to transport funding and policy, at least in the mid-term and this is very welcome, but we are not yet convinced it will come in time (if it does) to reverse the poor decisions about development location and road investment which will influence behaviour for decades to come.

The simple fact is that if we are to tackle Climate Change and provide development where it is most needed, supported by the right investment in Public Transport, it is essential that the Predict and Provide policy approach, particularly to road development, is reversed.

Key Point 1: Climate Change

The stated aim of the Transport Strategy Refresh (TSR) document is to use Midlands Connect's role as a sub national transport body to inform the government what the priorities are for national and regional infrastructure and the programs and policies that will support those priorities.

We believe the most important and pressing question is how the refreshed strategy will address the key issue of Climate Change, and this should be the primary Question.

The previous 2017 Strategy contained no reference to Climate Change or the Government's obligations set in legislation so the recognition of this as a challenge is welcome.

What is evident from its position in the list is that Midlands Connect have yet to fully grasp the immediacy of the risks.

The TSR recognises that there is just 10 years to make significant reductions in carbon emissions to limit higher rates of climate change. It notes that we are heading in the wrong direction with transport emissions increasing. It also recognises that population and economic growth will outstrip any gains from the introduction of electric cars at the rate assumed.

The current DfT assumption is that all HGVs will still be diesel powered in 2050. This assumption is used to derive a Carbon Baseline (Figure 7, reproduced below) which shows a reduction of less than 10% by 2050. This is clearly trivial in terms of achieving net zero by 2050.

Cumulative CO2 Emissions from Transport in the Midlands - Baseline

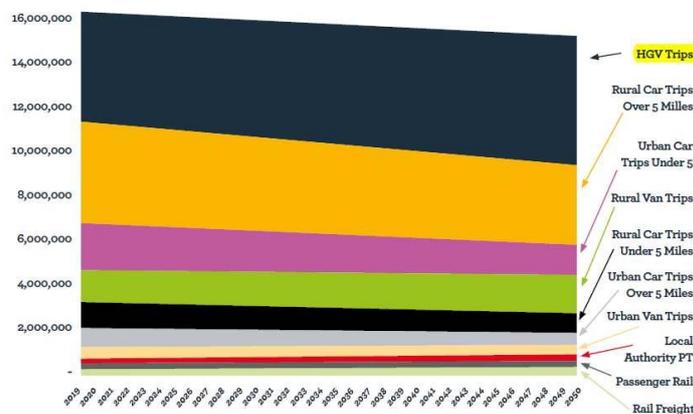


Figure 7: Total CO2 by mode (tn) in the Midlands (Source: Midlands Connect Carbon Baseline)

There is no attempt to look at the effect that any proposed measures would have to rectifying this or to setting a pathway towards this obligation. The need for urgent and effective action is evident, as is the need to decarbonise all road vehicles including HGVs, where emissions continue to increase.

The TSR proposes working with local authorities to prepare a decarbonisation pathway to see what part they can play. This would also feed into national policy from the Department for Transport's (DfT) Decarbonisation Plan due out shortly. Whether Midlands Connect has contributed to the DfT Decarbonisation Plan is not stated.

And while schemes like Midlands Engine Rail (MER) can provide some improved connectivity, their contribution to reducing carbon will be relatively small.

The introduction of electric cars will assist meeting these targets, but the reduction achieved will be undermined if development in unsustainable locations increases car use.

The need to decarbonise HGVs is quite clear from Fig 7 but it is not clear how any failure to achieve this would be factored into logistics planning.

The Transport Action Network has rightly challenged the failure of Government to consider its Climate Change obligations when approving Highway England's road strategy RIS2. The 2014 National Policy Statement for National Networks¹ also predates the Paris Agreement so that also fails to take account of our climate obligations.

So, while TSR acknowledges the issue, we consider significant changes need to be made to provide the essential reductions that will be needed to meet our obligations.

We also note that, although the 'aims and objectives' refer to minimising other environmental impacts, there is no consultation question in regards to the impact on biodiversity or landscape.

The impact of Transport on the wider environment remains a major concern and should be addressed by Midlands Connect. Among the proposals they are supporting are schemes which would directly impact on the landscape, for example, widening of the A46 where it passes through the Cotswolds National Landscape (AONB) close to Bredon Hill. We would like to see a clearer commitment from Midlands Connect to protect the countryside and avoid harm to important landscapes.

¹ National Policy Statement for National Networks (publishing.service.gov.uk)

Key Point 2: Links to Planning and Growth

We believe this is a particularly important moment to review the direction of strategic transport spending across the Midlands in the light of the impacts on the economy and land-use needs that we anticipate post COVID.

Specifically, in its statement of 16 December 2020 on Planning, the Government anticipated significant shifts in development needs². The statement withdrew the proposed new housing ‘algorithm’ which controversially would have forced more new housing into the countryside.

Instead, the twenty most populated urban centres in England saw their housing needs uplifted by 35%, with the intention of a greater emphasis on redevelopment of underused and derelict land. This includes towns and cities within the Midlands.

The statement goes on to set out three good reasons why this housing should be prioritised in our main towns and cities. Firstly, because that is where the services are, secondly, because of profound changes anticipated in the retail and office sectors and thirdly because it supports goals to protect the environment and curb Climate Change.

It is not yet clear how this will be delivered but, as the Government is also removing the Duty to Cooperate one would expect more housing in urban areas with a review of the approach to issues such as windfall provision and town centre regeneration strategies.

In that context, we note that the ‘Aims and Objectives’ on page 8 and 9 of the Refresh Document refer to ‘Enabling population and employment growth *planned by Local Authorities.*’³

We simply do not agree that either the level or the distribution of development proposed in many areas of the Midlands, which are largely based on pre-COVID assessments of need and urban capacity, (for example the Leicestershire Strategic Growth Plan) are compatible with the intentions of this new statement.

We accept that Midlands Connect is not a regional planning authority, but it seems to us that there is a need for a review of what kind of transport infrastructure would best support the more sustainable patterns of development now anticipated by the Government and that there is an urgent need for a dialogue between Midlands Connect and the local planning authorities, particularly those facing the greatest pressures to release land for housing.

² Government response to the local housing need proposals in “Changes to the current planning system” - GOV.UK (www.gov.uk)

³ The Refresh document includes different wording of the aims and objectives in the boxes to the text. This is not helpful and should be addressed in future iterations of this process.

This is the only way to create a virtuous loop between sustainable development and transport. It is no longer possible to detach unsustainable development patterns from transport investment decisions. Midlands Connect certainly should not assume the sum of local plan development proposals.

In particular the need for large inter-urban road interventions becomes much harder to justify. Moreover, the best way to provide reliable and fast connections to enable Midlands Businesses to Grow is to address the locally generated causes of congestion.

In other words, the TSR's continued support for substantial growth and large-scale transport proposals aimed at improving connectivity between towns and cities falls short in considering how these relate to wider transport and other objectives. Moreover, in terms of road infrastructure such a strategy is likely to prove self-defeating as it allows traffic and (hence) congestion to grow in our urban centres.

Key Point 3: Levelling Up

There is a suggestion in the TSR that building and investing in infrastructure has helped pull countries out of a recession faster and that connectivity is a key to a successful economy. It assumes that there will be a long-term need to accommodate future growth and that this will require more infrastructure. This is claimed to relate to the 'levelling up agenda'.

The TSR shows at Fig 5 that transport spending per head is much lower in all English regions compared to Greater London. But it does not acknowledge that in London transport spending has been, and continues to be, strongly focussed on increasingly public transport and sustainable modes.

So, while we agree in general that additional money should be directed to other parts of England, it is not simply a case of levelling up spending. Increasing the amount of money spent per head in the Midlands will only be successful if that investment is directed towards sustainable transport where it is actually needed and where the best value outcomes will be achieved.

Unfortunately, this is not entirely in the hands of local politicians and residents. The lack of integration of funding streams means that money for Rail, Strategic Highways and the MRN are in different pots to local transport funding.

There are hints throughout the document of a more integrated approach to transport spending but there is no clear proposal to move to this. The role of Midlands Connect, however, remains primarily to list schemes for funding from a narrow range of schemes which do not in general support integration.

The summary identifies this problem and Midlands Connect says it intends to use responses '*in discussions with Government about how it structures and allocates funding in the medium to long term.*' This is welcome and reflects the modal issues that concern us. However, this will not impact on immediate priorities.

Key Point 4: Modes and Local Transport

It is welcome that the TSR seeks to integrate local networks but it is still seen only in terms of how these might improve longer end-to-end journeys which are a minority of all journeys made.

The TSR does not include the four headline outputs from the 2017 strategy and this is in itself welcome, as the outputs for roads, in particular, were couched in terms of speed and reliability on the SRN which is a poor predictor of transport efficiency. It is unclear, however, if these outputs have been superseded and if so by what.



Work in 2019 on the Alternatives Futures Report suggested a scenario-based approach. But this does not appear to have been followed through in informing this strategy and there is no reference to those scenarios, even though Scenarios 1 and 2 would appear to be consistent with the Government Statement of December 2020 referenced above, and also reflect how post-COVID planning, both in transport and planning, might support sustainable development.

The lack of integration between these pieces of work is not encouraging, given the need to address sustainable development goals, which is understood in the Refresh documents.

Instead, it suggests better connectivity is desirable to enable people to get from their front door to anywhere in the Midlands to access whatever they need, by road.

As the summary puts it: *'However, while we'd ideally improve journey times and connectivity across every corner of the Midlands, across every mode of transport.'* That is not a desirable outcome and would only fuel longer journeys and more carbon use, while undermining the need for better local services and local transport.

We agree with the TSR that this is a complex issue and that there is a need to look at why and where people travel. However, this only appears to have been done for longer journeys, with a clear preference for expensive major roads and rail infrastructure that facilitate growth.

It also suggests *'looking for opportunities to lock in'* more sustainable travel but it is hard to see how this phrase will be made a reality.

At the moment the majority of journeys across both regions are made by road. *'Decarbonising Transport'*⁴ shows the West and East Midlands have the highest level of car use for the journey to work in England at 80% and 79%. Some places exceed 90% and travel patterns are highly dispersed and poorly catered for by public transport which lacks integration. The main exceptions to this are those areas which are close to the centre of towns and cities, where fewer people own cars and public transport services tend to be more frequent.

More journeys are also made on foot or by bike in and around urban centres. In the main, public transport services typically radiate from a centre and the vast majority are provided by buses.

Public transport is at present only an attractive option for a minority of journeys in and between the East and West Midlands. As many journeys made by public transport currently require more than one tickets, this can make them expensive too. The recent publication by the Government of *'Bus Back Better'*⁵ shows it wants to tackle this issue but there remains the problem that far too much development has been, and continues to be, permitted in places where good public transport is unlikely to be available.

The TSR has a stated aim to shift as many people as possible away from cars and onto alternative modes of transport but this has a heavy focus on rail. Rail has a role to play but is severely restricted in the journeys it can cater for in an attractive way because there are relatively few stations.

The Strategy recognises that we can't simply build more roads yet continues to supports a long list of road schemes. The previous strategy identified priorities for substantial rail and road projects over a 20-30-year period. The refresh includes an extensive road map of *'Early Priorities from our first strategy'* and the Summary includes various corridors as well as 10 schemes on the MRN, so it appears to continue to rely heavily on road infrastructure improvements.

⁴Decarbonising Transport: Setting the Challenge (publishing.service.gov.uk) Figure 4: Percentage of workers usually travelling to work by car by region of workplace, Great Britain, 2018

⁵ Bus back better - GOV.UK (www.gov.uk)

The Refresh also asks if there is a different way to fund transport moving forwards. It talks about more integration but the examples given demonstrates limited engagement with the previous Scenario process. In effect it is a roadmap for new housing. Where this is located outside the existing urban areas, as would be the case for many housing sites proposed in areas such as Leicestershire, would be largely car-dependent with the majority of additional travel being by car.

Moreover, we question the realism of the TSR. One example of this is its consideration of an aspiration to build a railway station to serve a new 'sustainable' development (Fig 8).



Figure 8: Using transport investment to facilitate housing development involves a number of different funding streams

What it fails to recognise is the cost of building a railway station, the time taken to deliver it, and the extent to which it could reduce the number of car journeys to a typical development.

In reality the number of car journeys removed by one railway station is going to be very small. The cost of a railway station might well be over £10 million and the delivery period could easily exceed 20 years. Furthermore, based on experience elsewhere, the likelihood is that delivery could not be guaranteed.

A welcome change is the recognition that the strategy must take a broader view than just looking at strategic road and rail infrastructure. The TSR now recognises that it is necessary to consider how people reach 'strategic' infrastructure. However, it draws a distinction between strategic infrastructure and local infrastructure, which remains an unhelpful artificial division. The transport system must be considered as one integrated network that is needed to make millions of disparate journeys.

The problems of rural public transport are particularly difficult to resolve. It is also unclear to what extent COVID will influence behaviour in rural areas. An integrated solution to providing better connectivity is welcome and the TSR approach, based on the concept of 'rural hubs', a welcome concept and appears to be a significant

departure. However, there is no indication of how these would be funded and what output they would be expected to achieve.

Key Point 5: Technology

The TSR has a worthy aspiration to bring people back to public transport using technology. The proposals for Tap and Cap Ticketing should make it easier to travel by public transport, provided it does not discriminate against those without access to the necessary technology.

However, the main problem is the lack of an integrated public transport network designed to facilitate journeys across the region and within cities (and the proliferation of development in unsuitable places).

This is further prevented by the deregulated bus environment and the lack of expertise to plan, run and finance integrated public transport networks. This is recognised in 'Build Back Better'⁶.

'Bus Back Better', the new (March 2021) National Bus Strategy, proposes to change this. Midlands Connect could help local transport authorities to make the case for replacing deregulated buses with franchising networks covering counties. This is standard practice across continental Europe and is a proven way of increasing public transport use.

Other technological improvements, such as improvements to traffic management, are also supported although the impact of these is likely to be minimal where congestion determines delays and improvements at one location can simply increase (even make worse) other congestion points, particularly on local roads into cities.

TSR does not address or propose road user charging, parking charges or other fiscal measures which have been made easier to implement by the introduction of technology. The role of these in influencing modal shift is important. And the Government has already recognised that there is a need in future years to replace revenue lost from fossil fuel taxes as electric vehicles are implemented.

Midlands Connect could play a leading role in this, both instigating discussion about the role of such demand management measures, and seeking to co-ordinate them to avoid some of the issues (for example, integrating Oyster Card and other similar systems) that have dogged other transport technology roll-out.

⁶ Build Back Better: our plan for growth - GOV.UK (www.gov.uk)

More Detailed Comments on Schemes and Corridors:

Rail and Coach

The TSR and the 'Summary' do not contain the same information. The 'Summary' at Page 4 lists '*seven Midlands Engine Rail schemes*' which are not mentioned in the main TSR, though the same sketch-map is used. Moreover, even though it is a stated aim of the consultation, it is difficult to assess or comment on the soundness of these rail 'schemes' because the TSR contains no details of them.

There are added uncertainties regarding the Eastern leg of HS2 (to Leeds). While we recognise that this would need to be considered as part of an integrated strategy if it happened, HS2 is beyond the control of Midlands Connect.

Moreover, we believe Midlands Connect needs to be cautious about whether the promised potential of HS2 will be delivered and we are sceptical of some of the claims made for the scheme.

That being said, improving Rail services between the East Midlands and West Midlands is generally supported, as they have been traditionally poor.

We are concerned that the 'Midlands Rail Hub' is somewhat vaguely defined and it is unclear what the impact on connectivity would be of removing some services from New Street to Moor Street station in Birmingham. New Street is where most trains now call, making interchange between a number of routes simple. While, there may be a case for freeing up some capacity, there is a need to ensure connectivity is not lost.

We are also not convinced that the aim of the 'Rail Hub' is clear, whether it is to assist HS2, to provide better integration for existing rail journeys, or to make current services attractive to a wider population, and thus aid modal shift. Until there is more detail it is hard for CPRE to come to a firm conclusion on the various elements of this scheme.

We strongly believe that pressure on rail capacity within Birmingham could be reduced if there were more direct services between other urban centres in the West Midlands and that this could also support local regeneration.

Linking up existing lines and filling a few gaps where track has been lifted could provide much better connectivity. There are two important corridors of regional importance that should be further investigated:

- (1) Between Nottingham, Derby, Burton-on-Trent, Lichfield, Walsall, Wolverhampton and Telford, which would make Walsall a new 'hub' for the north of the conurbation

- (2) Between Nottingham, Leicester, Coventry, Leamington Spa, Stratford-upon-Avon, Evesham and Worcester (and possibly Cheltenham) - a sustainable transport alternative to the 'A46 corridor' road proposals still favoured by Midlands Connect.

The Bordesley Chords in Birmingham are supported as they would increase flexibility in the system. It should be noted that a planning consent for new housing granted on appeal by the Secretary of State in March 2021 may prevent the southern of the two curves being built but does not affect the northern curve.

The abandonment of franchising should remove wasteful competition freeing up track capacity and, in many cases. Longer trains could resolve crowding problems on particular routes and could be delivered cost-effectively.

Improving other services, including on the periphery of the region, such as those towards Lincoln and Shrewsbury, would provide additional benefits and are supported.

The 'Summary' includes 'Birmingham Airport Connectivity' as a 'Midlands Engine Rail scheme' but no details are offered in the TSR for this. It does not appear to be a rail scheme as such, and so should not be included under that title.

We acknowledge that there may be public transport elements of this which we would support but the details are not included in the TSR so it is again hard to make definitive comments.

A long-term outline transport strategy has been developed for the Toton area and is supported by Midlands Connect. We welcome long-term planning and the proposed enhanced rail and bus connections to the Toton Hub in principle assuming that HS2 is built.

However, as noted above, it should not be assumed that this part of HS2 will be built given the uncertainty regarding the future of long-distance travel, changed work patterns post-COVID, and the very significant cost of this phase of HS2. Refocussing transport around Toton will in any case lead to less sustainable travel patterns.

There is clearly an urgent need to create meaningful employment in North Nottinghamshire, but the current plans around Toton assume that those living in North Notts will travel all the way to the Toton hub to access employment. The sustainable option is to create the employment where people live such as in Mansfield and the other North Nottinghamshire settlements.

The proposed improvements to walking and cycling in the Toton area should be implemented regardless of other developments because they will enhance sustainable transport option in the area for people who already live or work there.

We are not in favour of the East Midlands Freeport which could generate so much rail freight traffic that there will be no capacity for the much-needed East-West rail passenger improvements.

As well as improving rail, we would also support improvements in coach services, and we welcome the work Midlands Connect says it is doing to 'identify' regional coach services to extend the benefit of rail improvements (and presumably to provide services in their own right which complement them). However, the Refresh document gives no details which makes it hard to comment in detail. This suggests this is not being given sufficient priority yet.

We would also like to see the much-vaunted aim of integration of public transport, including walking, cycling, bus and tram, to be prioritised with clear programmes of work for Midlands Connect and partner authorities to deliver effective proposals. The Government's Bus Strategy is showing signs of recognising the importance of integrating public transport but its proposals and funding priorities show little determination to reduce car use.

Midlands Connect should be helping to make the case for the radical changes needed.

Road

The Strategy places a great priority on road investment with a long wish-list of schemes, many of which have no details and for which there does not appear to be a business case presented. No information is given to say why these are included and it appears highly unlikely that sufficient funding will be available for many of them. The main and summary documents are inconsistent. Indeed, the MRN schemes only feature in the 'Summary'.

The TSR lists six corridors for which it is stated '*intelligence*' has been gathered on '*traffic levels, travel patterns, freight needs, housing and jobs growth (both planned and possible)*,' following which have been developed '*concepts for infrastructure which may be required to better support existing needs and future growth.*' Unfortunately, this information is not published with the TSR.

Indeed, no evidence is presented to show that these roads are in any way special or deserve the artificial 'corridor' designation which gives them priority.

However, the TSR goes on to say: '*As described previously, our new Strategy will put forward what we believe to be the 'no regrets' road infrastructure investment needs for the next 5 to 10 years. These will be the schemes we feel will be needed regardless of uncertainty of future traffic levels and economic growth.*'

The surprising term '*no regrets*' is new and problematic. The idea that schemes are needed regardless of uncertainty about future traffic levels denies the actual impact of inter-urban road schemes which is to generate additional traffic and create the need for further road expansion.

The summary document narrows these down to three routes, the A5, A50/A500 and the A46.

There has historically been significant piecemeal investment on both the A5 and the A50/A500. The A5 is paralleled in part by the M6 and the M6 Toll and relatively close to the M54. Showing the A5 route going west to Holyhead through the Snowdonia National Park is misleading. It is not a suitable route and traffic should not be encouraged to use it. The fast route for heavy traffic should be the A483 past Wrexham then A55 along the Welsh coast.

In the case of the A46, between Tewkesbury and Humberside, it is defined in the document as the 'Trans Midlands Trade Corridor'. Freedom of Information requests and other sources have provided more evidence to show this its function in this regard is limited.

CPRE's detailed report of April 2020 on the A46 Corridor showed that this A46 corridor is largely a construct of Midlands Connect itself. There is little clear evidence that the role it plays justifies the economic or transport emphasis placed on it by Midlands Connect.

The volume of long-distance traffic on the A46 is small as a proportion of the traffic levels on most of the route so numbered. The main congestion problems relate to specific locations: Ashchurch, Coventry and Leicester in particular. In the case of Leicester, Midlands Connect appear to have toned down the aspirations for an A46 Expressway, which is welcome although major road building is still being pursued by local authorities to support unsustainable housing development in that corridor.

The real need in all these locations is to primarily address the causes of congestion, and the local transport and planning solutions required to reverse that situation. While, as in Ashchurch, this may include some road infrastructure it is unlikely to be of the level envisaged in previous work by Midlands Connect.

We believe it is now time for Midlands Connect to acknowledge that the A46 corridor does not have the importance placed on it.

In particular, the aspiration for a dual carriageway along the whole route, including in sensitive areas such as the Worcestershire part of the Cotswolds AONB, should be considered outdated.

Instead, Midlands Connect should address those local issues using the scenario planning approach which was identified in 2019.

We have not considered the ten 'Major Road Network and Large Local Majors' road schemes in detail as so little information is given on each one. However, we note the emphasis on the MRN further skews funding. These schemes amount to a total cost of £453 million. Because they are being put in a list submitted to the Department for Transport, this large amount of money is being concentrated on

road building and is not available for more local needs, and local politicians cannot redirect it to those needs, even if they are more pressing.

Funding is further distorted because the Department for Transport has also allocated £4 billion to Housing Infrastructure Funding (HIF) bids. These are almost all for road infrastructure. This exceeds the recent £3bn announced for bus measures nationally in conjunction with the bus strategy. That could make a real difference even if it was reallocated just in Birmingham.

According to the Summary Midlands Connect is '*continuing to work with local authorities to develop a robust pipeline of schemes for the MRN to support all road users.*' Despite elsewhere berating the skewed nature of transport planning, this will ensure that further MRN schemes come forward and that money remains unavailable for other transport schemes, while local authority officers are presumably working up MRN schemes rather than other schemes.

Emphasis is placed on ensuring these schemes benefit all users but no evidence is given to show how that is the case and, even if pedestrians and cyclists are prioritised on those routes, it is unlikely to be where investment is most needed to encourage sustainable transport modes.

Conclusions

Broad Points

In conclusion CPRE considers this consultation is flawed because 1. there are inconsistencies between the TSR and summary documents and 2. because insufficient information is given on the headline schemes to allow meaningful comment.

That being said, we welcome the emphasis in the TSR on Climate Change which was not in the original but believe Midland Connect's ambition is not yet sufficient and this colours its priorities.

We are concerned, more widely that there is insufficient emphasis in the TSR on protecting the environment more widely or on the impact on the Midlands landscape.

We also welcome the acknowledgement of the need to address traffic growth and the balance of transport spending in the medium term, however, the current programme is heavily based on bidding for new road infrastructure on the SRN and MRN.

We welcome the emphasis on links into town and cities but Midlands Connect is still failing to address the need to redirect transport spending away from inter-urban road building.

We welcome the acknowledgement of the link between development and traffic growth, but we do not agree that Midlands Connect should simply accept development figures in current local plans but should actively work with Councils and Government on the implications of redirecting housing and other development into cities, as part of an urban regeneration strategy.

We agree that increased transport spending should be redirected towards the Midlands but this will only be effective if it is targeted at where it is needed most, improvements to Public Transport, both local and inter-regional.

We are not clear if the high-level outputs from the previous strategy have been dropped. These were unhelpful.

Specific Proposals

In terms of schemes, we accept that Midlands Connect is not a local transport authority, but it should be supporting a rebalancing of transport spending towards urban areas, and identifying where spending could deliver urban regeneration.

We support improvements to the rail network, including work to improve service to more peripheral places such as Lincoln and Shrewsbury. We support improvements which will benefit integration at Birmingham and reduce bottle neck issues. However, these lack sufficient detail in the strategy. We also believe that additional services on routes avoiding Birmingham should be explored.

We welcome the reference to coach services but believe there should be more work to enhance their role and integration.

We would like to see further work to ensure integration is central to the public transport offer.

We welcome the emphasis on technology to make travel by public transport easier, provided access remains inclusive.

We do not support the continued emphasis on road building, or the concept of 'no regrets' road building

We believe the emphasis on the three corridors and, particularly A46 corridor, is misplaced. Particular bottlenecks should be addressed at a local level with the emphasis on reducing local car usage.

We also do not support the emphasis placed on the 10 MRN schemes which skews transport spending away from more local priorities.