

Transport for the North: consultation on draft Strategic Transport Plan

10 Core Responses from environmental transport organisations

Organisations & individuals are invited to indicate their support for these **10 Core Responses** (presented in logical, not priority, order) alongside their own independently determined submissions. It's perfectly acceptable to qualify support for any individual Response should you wish to do so, or disagree with any. Analysis supporting these Core Responses is at www.transportnorth.org.uk Send your response to transportplanconsultation@ipsos-mori.com

- 1. The development of a Pan-Northern Transport for the North strategy** is strongly supported if it can contribute to long-term and overall sustainability, particularly by integrating economic growth with carbon reduction (as the government's *Clean Growth Strategy* requires); and by reducing economic and social divergence between North and South (of the UK), and within the North.
- 2. The objectives and analysis of its underpinning Independent Economic Review** – 'to raise the growth rate of the North's productivity, GVA and employment above past trends, helping to close the productivity and prosperity gap compared with the rest of England' - are supported if the IER's carefully balanced findings are translated properly into the Strategic Transport Plan (STP), and if these uplifts can be achieved sustainably in relation to their environmental and social impacts.
- 3. The principal finding of the IER relating directly to transport/connectivity** is strongly supported: "Transformational improvements to the North's transport connectivity are also critical, both between and within cities. Enhanced pan-Northern city-centre to city-centre rail links, east-west and north-south are needed to facilitate the bigger labour markets that support the success of knowledge-based firms – and, to be effective, they 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." *IER executive summary p.19pdf*
- 4. The STP has failed to adequately translate critical parts of the underpinning IER/TfN analysis:** it gets the balance wrong between activity *within* or *between* the North city regions, where in fact the preponderance of the IER's 'economic capabilities' are located within urban areas; instead TfN has introduced its key 'strategic development corridor' concept, with untested consequences, when the concept is not in fact promoted by the IER; and has failed (so far) to integrate the substantially different outcomes of its various transport demand scenarios *STP p26-27*, or resolve the tensions which these create within the SDC concept or the choice between 'digital' versus 'physical' connectivity. The implications are that **investing in more 'digital' connectivity and within city regions - rather than physical connectivity along corridors** (what the STP is proposing) - would be best for sustainability *and* a transformed Northern economy. Then the STP fails to deal with the competition for scarce public funding between its own programmes, and those of the separate city region ones which should be prioritised for major transport investment *p76-77*. In combination these are very serious flaws.
- 5. The TfN strategy should be driven by explicit spatial objectives** - promoting economic/social **convergence** between North and South (of the UK) *and* within the North - with outcomes tested by modelling (as suggested by the environmental transport organisations in October 2016); and with investment in improved connectivity focussing *within* the North's city regions where GVA agglomeration benefits are to be found. The failure to follow this approach has inevitably resulted in spatial 'Winners' and 'Losers' (demonstrated by TfN's own figures; which have not however been publicly disclosed). The STP's proposed investment programmes would actually bring about spatial and economic *divergence* - rather than *convergence* - across the North.
- 6. The STP's proposed major investment in rail infrastructure and improved services** is strongly supported; as is the commitment to roll out pan-Northern **smart ticketing**. Major investment in **new road schemes** intended to facilitate more/longer road journeys (with these being identified as labour market benefits), and with unmodelled impacts on local networks, is not supported.
- 7. In 2018 a transport strategy is fundamentally required to support the achievement of the Committee on Climate Change's recommended carbon reduction: 44% reduction by 2030** (surface transport), together with a threshold for aviation carbon. Consequently the STP requires an explicit carbon reduction objective, and target, which shapes its every aspect and would apply to all its partners. Because it does not do this - there is no carbon reduction objective or target, and a projected carbon reduction of **only 9-14% (so a shortfall of 68-80% against the CCC requirement)** - the STP fails the 'carbon test' and cannot be supported on this ground alone. The strategy's attempted promotion of *increased* aviation carbon emissions is condemned, particularly since the analysis on which this policy is based is unsound.
- 8. The STP has failed to demonstrate that its overall approach and road investment programmes are supporting compliance with legal requirements for air quality**, as now imposed by the Supreme Court.
- 9. The STP has not demonstrated how it resolves the tensions between its major investment programmes (particularly road) and their impact on the natural environment and protected landscapes.**
- 10. Consequently the strategy risks failing the test set for it in TfN's founding statute** – that it 'must have regard to the social and environmental impacts in connection with the implementation of the proposals contained in the strategy' *Cities & Local Government Devolution Act 2016 section 102I 'Transport strategy of an STB' subsection 8b* - and is therefore potentially open to legal challenge.