CPRE RESPONSE TO THE CALL FOR EVIDENCE BY THE HOUSE OF COMMONS TRANSPORT SELECT COMMITTEE ON HOW THE GOVERNMENT SETS ITS STRATEGIC TRANSPORT OBJECTIVES

AUGUST 2023

CPRE, the countryside charity (formerly the Campaign to Protect Rural England), welcomes the opportunity offered by the Committee to comment on how the government sets its strategic transport objectives and how these objectives do – or should – influence decisions on investment in, and cross-government planning of, services, networks, and infrastructure.

Q.1 What is your understanding of the government's strategic transport objectives? Are they the right ones, and if not, how should they be changed?

1.1 The most fundamental failing of transport policy in the UK is that there is not one single, prevailing over-arching strategy which sets out parameters for the future across all modes and that integrates them into one transport system that sustains environmental social and economic goals. The job is done in silos. We have separate strategies for buses, cycling, rail improvements and strategic roads, all lacking clearly defined objectives. Even where strategic objectives are presented, they are vague and would not lead to an integrated transport system. In the 2014 National Policy Statement for National Networks the vision and strategic objectives for the national networks aim to support the economy; improve journeys; deliver environmental goals; and join up communities – but they do not explicitly embrace decarbonisation, all modes or demand management of traffic to achieve wider goals. In a similar fashion DfT's aims in its Delivery Outcomes for 2021-2022 refers to improving connectivity and building confidence in transport networks, decarbonising transport, and increasing global impact. By contrast DfT's Decarbonisation Strategy encompasses all modes but they are not integrated into a holistic system; and the strategy's one clear objective – in urban areas 50% of all journeys would be by active travel by 2030 – conflicts with the strong message about continuing to travel by car.

> '*It's not about stopping people doing things: it's about doing the same things differently... We will still drive on improved roads, but increasingly in zero emission cars.'*

1.2 This is in direct contravention to advice from the Climate Change Committee in its July 2023 progress report to Parliament and from the Transport Select Committee's July 2023 report on strategic road investment. Both recommended demand management of road traffic and modal shift.

1.3 And, whilst there are oft expressed aims of achieving stronger economic growth, lower carbon emissions and greater accessibility, there is no attempt to assess benefits and disbenefits between and across different schemes. The Treasury Green Book emphasises a strategic approach that reflects national and regional/local objectives and adopts a natural capital approach, but this is rarely seen in major scheme assessment.

1.4 CPRE agrees with the Institute for Government's criticisms of the lack of assessments of the outcomes achieved by transport schemes. They conclude that integrated transport has never been properly implemented in the UK and call on the government to use evidence to incorporate new thinking and the best of international practice as well as understanding the trade-offs inherent in any decision (https://www.instituteforgovernment.org.uk/our-work).

1.5 Below we list examples of what we consider would be appropriate strategic transport objectives:

1. Rapid reduction of UK carbon emissions from transport in line with the trajectory for carbon reduction to near zero by 2050 or sooner.
2. Reduce the need to travel, especially by car (see CPRE's sustainable travel hierarchy in response to Q7).
3. Make best use of existing transport infrastructure using demand management and modal shift.
4. Enhance social inclusion and health e.g. zero KSI by 2030 and WHO targets for air pollution met, and improved accessibility to everyday needs.
5. Integrate planning and funding for all modes.
6. In Rural areas, an "Every Village, Every Hour" bus service would be welcomed; but failing this minimum bus / train service guarantees for rural towns above 3,000 population
7. 50% of all journeys in urban areas to be by public transport, walking and cycling (this is GMCA's aim for 2040).
8. Fully integrated public transport information, booking and ticketing systems, with a single ticket or card covering the whole journey.
9. Economic development that sustains the environment, and communities and the places where they live, work, and recreate.

Q.2 How well has the government articulated the outcomes and objectives it seeks from the country's transport network? How could this be improved and what impact would better defined objectives have on transport planning and investment?

2.1 Poorly, as we have shown above in answer to Q1. In order to improve strategic objectives, they need to focus on the action required e.g. rapid decarbonisation of transport in order to meet the carbon reduction trajectory to 2050, the UK carbon budgets and interim targets for 2030 and 2035. This focuses minds on the key outcome required. If great weight is given to transport decarbonisation in this way any proposal which leads to an increase in carbon emissions would be rejected at an early stage before a detailed appraisal is conducted.

2.2 The government frequently articulates that it believes there is economic benefit to be had from investment in transport infrastructure – despite the findings some 20 years ago by the Standing Advisory Committee of Trunk Road Assessment (SACTRA) that there is no automatic connection, in a mature and developed country, between providing more highway infrastructure and an improved economy. SACTRA's findings in its seminal report, 'Transport and the Economy' shone a light on the impoverished approach taken to cost and benefit analyses (COBA) and yet, in all the time that has elapsed since, there has been little improvement in it, as confirmed by the Transport Select Committee's July 2023 report of Strategic Road Investment, paras 10 and 11.

2.3 Economic growth should not be used as a goal for transport interventions. At the very best such interventions can sustain the economy indirectly by providing access to daily needs, and by improving health and wellbeing, safety, and the environment.

2.4 The poverty of up-to-date and transparent information on the progress of highway schemes (which also applies to all transport projects) was picked up by the Transport Select Committee's July 2023 report on Strategic Road Investment, para 68. *'The Government should work with National Highways to introduce a 'live' project dashboard which provides up-to-date information on each project in the RIS 1, RIS 2 and subsequent RIS portfolios. The dashboard should provide information on original and current: costs; Start of Work date; Open for Traffic date; and planning status (if applicable).'* Such an approach should also

articulate objectives and outcomes and be applied to transport interventions at national regional and local level.

Q.3 How well does the appraisal and decision-making process for new transport investment meet the government's strategic transport objectives? How should this be improved?

3.1 A transformational revision is required for how transport appraisal is conducted. Appraisal should reflect and deliver current national strategies within up-to-date policies and using up-to-date data, particularly in relation to climate change. Appraisal and decision-making cannot meet strategic transport objectives if transport interventions are promoted, as they currently are, to cope with forecasts in demand i.e., a 'predict and provide' approach. Instead, a 'vision and validate' approach, which involves setting objectives and a vision of the future, should be used to assess all the different options (both transport and non-transport). In a declared climate emergency, it is particularly inappropriate to use historic trends and modelling techniques. The urgent need is to produce a coherent set of actions that will meet or exceed the targets needed to meet the challenge. The Transport Select Committee recommended that the *'Government should model and report on scenarios where traffic levels on the SRN are a) reduced and b) maintained at current levels, alongside the transition to a cleaner vehicle fleet, in order to assess the potential contribution of demand management to reaching net zero'* (Strategic Road Investment July 2023, para 21).

3.2 The processes for appraising transport proposal have several significant limitations. These range from technical issues to the role these processes play in the decision-making process. On the technical side, the forecasts and modelling used in transport appraisal favour certain criteria. Valuations of savings in travel time tend to dominate and favour car drivers. Even small savings in journey times can be estimated to produce significant benefits because projects are routinely assessed over a 60-year period. By placing a higher value on the time of car journeys than on those made by bus, bike and foot, measures which can cause delays to car journeys, such as cycle lanes and bus lanes, score badly. In addition, because these models project past trends into the future, interventions which focus on behavioural change score badly.

3.3 Appraisal methods are also very complex and not well understood by decision makers in local and central government. While transport appraisal supposedly balances economic, social and environmental benefits, the economic case, especially the benefit-cost ratio, dominates thinking and decision-making on transport projects. Clearer guidance is required for analysts, based on more and better data – with more consistent assessment. And much more time and effort needs to be concentrated on assessing early options (see answer to Q4 below).

3.4 The COBAs carried out prior to granting scheme approval and scheme commencements are often seriously out of kilter with the eventual scheme costs. At present the approach to transport appraisal is highly centralised; DfT controls most of the funding for new transport infrastructure and sets the criteria for the other bodies, especially local councils, who access it. Policy or investment decisions are not made transparently. For example, it is extremely difficult to get hold of the suite of business cases supporting a major road scheme.

3.5 Transport projects are not consistently evaluated, either in local or central government. As already stated in response to question 1, there is no subsequent deep-dive research into the actual benefits and disbenefits of schemes. Inadequate evaluation misses the opportunity to improve future projects. It can be difficult to evaluate transport projects as their benefits can be gradual and hard to detect but National Highways carries out post opening project evaluations on its schemes at one, five and 10-year intervals are a case in point. These are conducted on an individual basis and have certain limitations and failings, as

demonstrated by Atkins', the multi-national consultancy, analysis of the POPE process in 2009 (https://bettertransport.org.uk/wp-content/uploads/legacy-files/HA-POPE-traffic+impacts.pdf). Many of the shortcomings identified then have still not been addressed. But, flawed as it is, it is still a post assessment process for strategic roads. Such a process does not exist for local authority schemes.

3.6 SMART objectives would focus minds, enable evaluation, and allow learning from projects.
Devolution of decision making and funding to regional and local authorities would mean that local people with local knowledge can decide their priorities with appropriate funding.

Q.4 How should wider economic, environmental and social impacts be appraised and valued, including when the gains will largely be felt in policy areas other than transport?

4.1 This question is biased because it only seeks to learn about 'gains' from transport investments and not about disbenefits. It is essential that a full picture of impacts is obtained. This should include mapping of emissions, air quality and traffic flows over a wider geography than is normally researched. Social impacts already include pedestrian and cyclist accidents, severance and noise but should stretch to potential impacts on community life and environmental impacts should place much more emphasis on light pollution and the degradation of landscapes, habitats and water courses – and over a significant area.

4.2 There must also be a transparent assessment of all reasonable alternatives to solve the transport problem against wider objectives, as required by the Treasury's Green Book. At each stage of project development alternatives should be revisited and compared against each other and against these wider objectives. Instead of mechanical or deterministic decision-making based largely on the BCR, the decision maker must explore and present the costs, benefits, and trade-offs of alternative implementation options and show how each one would deliver policy objectives.

Q.5 How can longer term certainty in planning be achieved in order to promote greater private sector investment from a range of sources?

5.1 A The planning process needs to be strengthened, not weakened. Loosening the planning system creates greater uncertainty. The Transport Planning Society, CPRE and many others call for better integration of transport and land use planning to create a firm basis on which to project forward.

Q.6 How effectively is strategic transport planning and investment coordinated across and between transport modes, including with reference to achieving modal shift?

6.1 Not well since the 2000 Integrated Transport Strategy was allowed to disappear into the long grass. (See response to Q.8). This failure has been well demonstrated by the work done by Transport for New Homes https://www.transportfornewhomes.org.uk/the-project/building-car-dependency/ . Almost all of the 20 developments it examined in detail will encourage car-dependent lifestyles, with the car the primary mode of transport. A typical new greenfield development is designed around the car – with as many as 2 to 3 car parking spaces per home.

6.2 The serious harm done by the lack of coordination between planning and investment is also well shown by recent events. There have been huge funding reductions to rural bus services and Active Travel England (https://www.sustrans.org.uk/our-blog/news/2023/may/don-t-be-fooled-by-the-government-s-good-news#:~:text=These%20cuts%20represent%20a%20two,by%202030%20will%20be%20impos

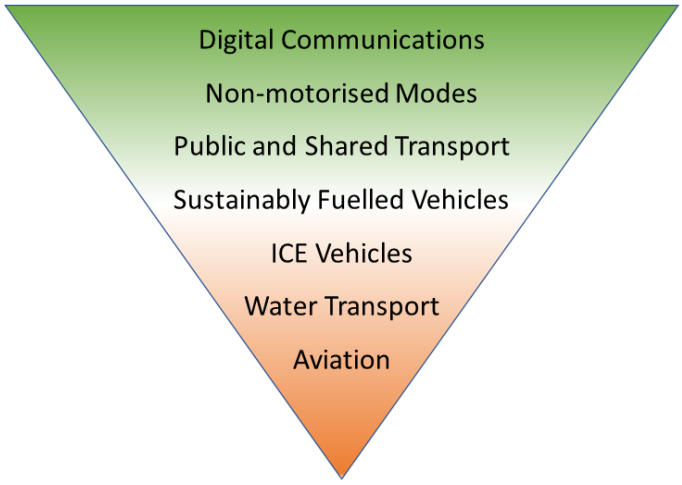
sible), and delay upon delay in improving rail lines such as the Trans-Pennine Upgrade and electrification for freight, whilst multi-billion-pound road schemes continue to get funding. This bias in funding is undermining achievement of decarbonisation and nature enhancement goals, impeding behavioural change and reduction of air and noise pollution, reducing travel choice for those without a car especially in rural areas, and delaying transformation to a just fair and inclusive society.

6.3 The Transport Select Committee in its July 2023 report on Strategic Road Investment para 36 gave a strong indication of where future investment should lie for strategic roads. '*Future investment should be focused on renewing older parts of the SRN and ensuring that resources are available to run the existing network efficiently. The Government must make sufficient provision for both revenue and capital maintenance funds, and could make more money available by cancelling complex, costly enhancement projects.'*

Q.7 How could planning for transport infrastructure across government and co-ordination of policy (e.g. with policy on energy, digital, planning) be made more coherent/streamlined?

7.1 Silo thinking extends to local and strategic roads and to transport and land-use planning. Most new development assumes and promotes high car use. Government departments are notorious for working in silos. But, even within departments, there are often weak links. In order to strengthen co-ordination and integration between planning and transport policy, the government should adopt CPRE's transport hierarchy. CPRE Transport Policy is based on a sustainable transport hierarchy (see diagram below), informed by that of the Energy Saving Trust[1]. It presents, in descending order, the decreasing sustainability of the options for travel and the choices that minimize carbon emissions and energy, reduce the need to travel and are the healthiest. For a multi-modal journey, each leg should be taken by the most sustainable means available. When planning, funding and implementing transport solutions the hierarchy should be applied downwards from the inverted base of the triangle, giving greatest priority from the top down. Its application is essential because until alternatives to the private car provide an equally affordable, convenient and attractive option people will not switch modes. Even then they will require initial encouragement with information and incentives.

CPRE's Sustainable Transport Hierarchy



[NB 'ICE' vehicles are those powered by the **I**nternal **C**ombustion **E**ngine.]

[1] https://energysavingtrust.org.uk/an-introduction-to-the-sustainable-travel-hierarchy/

7.2 In addition the Government should adopt Transport for New Homes' charter which calls for:

- New housing to be located and configured to avoid people being dependent on cars, and to enable low and decreasing travel by private car;
- Local authorities, working with their neighbouring authorities and transport providers, to plan housing developments along corridors with frequent public transport, or in places where they will facilitate such provision;
- New housing to be laid out to prioritise walking and cycling as the main means of access to local facilities, adjacent areas, and public transport stations and stops;
- Large-scale new housing to be designed around streets, places and spaces that are pleasant and interesting to be in, sociable and environmentally sustainable;
- Large-scale new housing to be built with a range of community facilities on site, or within easy reach by sustainable modes;
- New housing developments to benefit adjacent and nearby communities in terms of extra or better quality local amenities and sustainable transport provision, especially on routes that fill gaps in existing networks.

Q.8 How effectively is strategic transport planning and investment coordinated between national, devolved, regional and local government and other public bodies? Do the current division and distribution of powers help or hinder?

8.1 A The current division and distribution of transport powers amongst so many bodies is, unquestionably, a hindrance. The most promising set-up was in the late 1990's when the UK had a 10-year Integrated Transport Strategy in place as the over-arching strategic plan. Regional Transport Strategies existed beneath that and Local Transport Plans (LTPs) beneath them – and the LTPs were initially subject to sign-off by regional government offices and by the DfT who awarded funding against them. But that structure was not allowed to bed in before it changed and LTPs were down-graded to little more than nicely-written narratives by local highway authorities who now monitor themselves.

It is informative to compare the current incoherent system with what the Government's 2000 Integrated Transport Strategy offered.

'*Our vision is that by 2010 we will have a transport system that provides:*

- *modern, high quality public transport, both locally and nationally. People will have more choice about how they travel, and more will use public transport;*
- *more light rail systems and attractive bus services that are fully accessible and integrated with other types of transport;*
- *high quality park and ride schemes so that people do not have to drive into congested town centres;*
- *easier access to jobs and services through improved transport links to regeneration areas and better land use planning;*
- *a modern train fleet, with reliable and more frequent services, and faster trains cutting inter-city journey times;*
- *a well-maintained road network with real-time driver information for strategic routes and reduced congestion;*
- *fully integrated public transport information, booking and ticketing systems, with a single ticket or card covering the whole journey;*
- *safer and more secure transport accessible to all;*
- *a transport system that makes less impact on the environment.'*

This vision and these objectives provided a clear framework for the development of regional and local transport plans.
CPRE
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