

CPRE's vision is for a thriving, sustainable, low carbon countryside. This calls for integration of land use and transport planning as required by the National Planning Policy Framework<sup>1</sup> to reduce the impact of travel. Together they encourage a smart growth approach<sup>2</sup> encompassing urban regeneration, the curbing of urban sprawl, slowing the growth in road traffic, protecting the beauty and tranquillity of landscapes, and safeguarding wildlife habitats. Poorly located sprawling development leads to continuing car dependency<sup>3</sup>, with all its adverse impacts, loss of valuable countryside, and a decline in domestic food production and wildlife species. Cities and towns can be great places to live, but all too often there is no cohesive master plan for them as has become apparent with the decline of city and town centres.

Integration of land use and transport planning alone will not achieve CPRE's vision. High quality, affordable, frequent public transport is essential to provide sustainable low carbon options for rural residents to reach everyday needs and for urban dwellers to visit the countryside. Travel by car is the dominant mode of transport in rural areas and can degrade the quality of life for residents and the experience of the countryside by visitors. From visual intrusion and loss of tranquillity to land take for car parks, congestion in villages, and intimidation of walkers and cyclists by speeding traffic, it impacts negatively on those not in a vehicle. Where alternatives to the car are limited, those on low incomes or those who do not drive are forced to rely on lifts or community transport. Access to jobs, education and training, shopping, leisure, and everyday services is compromised and people are socially isolated.

While access to the countryside needs improvement, the climate emergency threatens its very existence as we know it. The climate emergency is therefore a fundamental issue for CPRE, which has its own climate change framework – beneath which its transport policies sit<sup>4</sup>. The transport sector is now the greatest contributor to greenhouse gas emissions<sup>5</sup> which need to be urgently reduced in order to avoid extreme temperature increases. If the highest 5°C temperature rise projected for the end of this century<sup>6</sup> is realised the English countryside will be unrecognisable – the landscapes of the future will be recognisable only to geologists. Everything will be affected: the natural world of wildlife, trees, water and soils; the historic and cultural heritage of landscapes; and the agricultural and tourist economy. Violent storms leading to flooding and sea level rise will lead to land loss driving future development onto green fields. To avoid these impacts and effect behavioural change we need to make best use of digital communications. Mindsets, technology and policies have to come together to reduce the need to travel, especially by car.

\_

 $<sup>{}^{1}\</sup>underline{\text{https://www.gov.uk/guidance/national-planning-policy-framework/9-promoting-sustainable-transport}}$ 

<sup>&</sup>lt;sup>2</sup> https://smartgrowthuk.org/ Meeting the Growth Challenge the Smart Growth Approach 2013 (CPRE is a signatory to this statement)

<sup>&</sup>lt;sup>3</sup> https://www.transportfornewhomes.org.uk/the-project/building-car-dependency/ Building Car Dependency 2022 Transport for New Homes

<sup>4</sup> https://www.cpre.org.uk/resources/cpre-climate-emergency-policy-and-supporting-topic-papers/

<sup>&</sup>lt;sup>5</sup> At 34%. In 2019 total transport emissions (including international air and shipping) amounted to 167 million tonnes CO2e out of a UK carbon budget of 494.5MtCO2e. 2021 UK final GHG emissions final figures – data tables Table 1.3 2019 is calendar year Jan-Dec <a href="https://www.data.gov.uk/dataset/9568363e-57e5-4c33-9e00-31dc528fcc5a/final-uk-greenhouse-gas-emissions-national-statistics">https://www.data.gov.uk/dataset/9568363e-57e5-4c33-9e00-31dc528fcc5a/final-uk-greenhouse-gas-emissions-national-statistics</a>

<sup>&</sup>lt;sup>6</sup> https://www.gov.uk/government/news/government-publishes-uks-third-climate-change-risk-assessment (CCRA3), Betts, R.A. & Brown, K. (2021) Introduction, 3<sup>rd</sup> UK CCRA3 Technical Report [Betts, R.A., Haward, A.B. and Pearson, K.V. (eds.)]. Prepared for Climate Change Committee, London

# Overarching Objective - Integration of land use and transport planning

Government departments should integrate planning and strategy implementation and provide leadership to sub national, regional, sub-regional and local authorities, to deliver all 'three pillars of sustainability'. Society, the environment and the economy should carry equal weight.

The current significant barriers preventing the integration of spatial and transport planning and the greater use of previously used brownfield land can only be resolved by a single strategy for transport produced by central government.

National planning policies should be consistent with a government-developed overarching national transport strategy, integrating land use and sustainable transport and ensuring that new developments, such as housing estates, business parks and retail parks are located where sustainable transport is a genuine choice.

Local Transport Plans (LTPs) should be prepared to support local plans, and ideally prepared and tested alongside such plans through the inquiry process. LTPs should be audited annually and reviewed regularly by independent assessors. LTPs often contain effective sustainable transport measures but local authorities fail to deliver them. They should be based on CPRE's sustainable transport hierarchy (see page 4) and their proposed measures should be adequately funded. Reducing the need to travel especially by private car would remove pressures for more highway capacity to be built, improve the quality of rural and urban life and reduce carbon emissions, pollution and environmental damage.

Planning for new development should be located within or sustainably connected to an existing settlement and provide good access by non-car modes. This needs to be considered from the start, before sites are allocated, and ideally centred on the ability to achieve effective and attractive public transport - trains, light rail, high quality sustainably fuelled buses. Frequent public transport services should be in place from Day 1 of occupation. Walking and cycling should be fully integrated through Place Making approaches and the creation of attractive and safe routes forming part of a wider network. A welcoming environment, not dominated by car parking, and where car parking is reduced is essential. Local facilities should be easily accessible without a car.

Regenerating cities as high quality places to live is preferable to out-of-town development. Renewal should include more safe shared use of road space and reuse of large car parks for mixed development. Low traffic and 15-minute neighbourhoods that improve the quality of life in cities and towns and, if feasible, in rural areas are welcome. 'Live locally' should be encouraged by good planning. In rural areas development should be focused on local service centres which act as hubs for multimodal transport provision<sup>7</sup>.

The countryside around towns, including where it exists the Green Belt, should be improved for local access and enjoyment, which would reduce the need to travel<sup>8</sup>. CPRE's vision is of 'a beautiful and thriving countryside for all'. A key aim of ours is to protect and promote the value of the countryside next door and local green spaces and amongst the outcomes we seek to achieve is 'better integrated transport policies' <sup>9</sup>.

<sup>&</sup>lt;sup>7</sup> Garden City Standards: 13 Sustainable Transport TCPA 2020 <a href="https://www.tcpa.org.uk/resources/guide-13-sustainable-transport/">https://www.tcpa.org.uk/resources/guide-13-sustainable-transport/</a> Garden Village Visions & Reality Transport for New Homes, 2020 <a href="https://www.transportfornewhomes.org.uk/the-project/garden-communities-data-sheets/">https://www.transportfornewhomes.org.uk/the-project/garden-communities-data-sheets/</a>

<sup>8</sup> https://www.cpre.org.uk/resources/green-belt-cpres-policy-position/

<sup>9</sup> https://www.cpre.org.uk/resources/general-election-manifesto-2023/

## **CPRE's Transport Policy**

Within a robust framework of integrated landuse and transport planning, transport policy must reduce the need to use the private car if travel is to be sustainable. Over many years we have created the cardependent transport system with which we all live. Many journeys occur, or particularly long journeys are made necessary, because of societal demands. A majority want to travel cheaply, safely and as short a distance as possible to work, schools, shops and clinics in a pleasant and clean environment. But few measures are implemented that enable or encourage walking, cycling or catching the bus or seamless interchanges between different transport modes.

If we are to reduce car-dependency, society's attitude towards sustainable choices must change. Using public transport, walking and cycling must be easier to choose, and more timely, obvious, cheaper, safer and socially acceptable than using the car. We also all need to understand that building new roads is not the answer to the travel problems we experience. Such 'solutions' are only ever short term ones as they generate more traffic growth – and they come with environmental consequences. Instead, we must make best use of existing infrastructure.

Interventions that would address the behaviours that are most likely to achieve that policy outcome are complex and multiple. They range from regulatory and coercive levers such as legislation and fiscal measures, to the educational and persuasive levers of communications and marketing. Such interventions need to show the benefit to a majority in the long term. For example, traffic management that addresses the needs of all users would favour low speed limits near schools and encourage cycle use. Fare caps on buses make it more affordable to leave the car at home and reduce congestion. Levies that charge vehicle users for their real impact on people and the environment bring the costs of car use to the fore (see policy 8 below). If increasing road capacity for more cars is a measure of last resort (see policy 12 below) it would release funding for investment in public transport and active travel.

However, it is not enough to influence travel behaviour in favour of sustainable modes. External conditions are crucial. Streets must feel safe, be free of speeding traffic and pollution, and offer an attractive journey. Public transport must be high quality, affordable, convenient, frequent and meet people's daily needs. Such services are not only essential to reduce car dependency but also for those without access to or who cannot drive a car. In the context of all these measures people would be enabled to consider sustainable travel options before resorting to the car. All of that said, where car travel is the only option, car sharing and car clubs should be encouraged as both reduce overall car use. (Car clubs have also been shown to reduce the purchase of second cars in households). Both should be based on sustainably fuelled vehicles.

Making sustainable travel choices a reality depends on implementation of a sustainable transport hierarchy. CPRE's version of this<sup>10</sup> (see diagram on page 4) 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 by car 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. We first deal with the application of the hierarchy to the movement of people and address freight movement separately. An evidence paper supports these policies.

<sup>&</sup>lt;sup>10</sup> Also see that of the Energy Saving Trust as an example <a href="https://energysavingtrust.org.uk/an-introduction-to-the-sustainable-travel-hierarchy/">https://energysavingtrust.org.uk/an-introduction-to-the-sustainable-travel-hierarchy/</a>

## **CPRE's Sustainable Transport Hierarchy**

Digital Communications

Walking, Wheeling and Cycling
Public and Shared Transport

Sustainably Fuelled Vehicles

ICE Vehicles

Water Transport

Aviation

[NB 'ICE' vehicles are those powered by an Internal Combustion Engine.]

# **Policy 1 Digital Communications**

Good digital connectivity is essential in order to reduce the need to travel by private car. It should be universally available in urban and rural areas, using underground cables where possible, rather than masts, overhead lines or satellite dishes which clutter the countryside. It is also essential to facilitate seamless interconnected journeys for people and freight, reduce travel disruption and increase safety. Land use planning should consider the revolution in home working and the change in commuting patterns.

Many rural areas lack adequate digital connectivity, yet it is crucial for reducing the impact of travel on the countryside rural settlements by providing remote opportunities for connectivity, learning, work and financial transactions. Accessibility mapping across all modes (linked to local transport and development plans) should better integrate policies.

### Policy 2 Walking, Wheeling and Cycling

**Deterrents to walking and cycling should be addressed**. Roads and junctions should be designed to avoid the primacy of vehicles. 'No car days' in towns and cities should be trialled to show everyone the value of a car-free environment.

Shared spaces with lower speeds, such as low traffic neighbourhoods and Quiet Lanes<sup>11</sup>, are quicker and much less expensive to implement than segregated routes for walking and cycling. Avoiding the primacy of motorised modes would reduce intimidation and road danger for non-motorised modes, lead to safer streets for all and improve public health and wellbeing.

<sup>&</sup>lt;sup>11</sup> Guide to Quiet Lanes, CPRE, 2003, https://www.cpre.org.uk/wp-content/uploads/2019/11/quiet lanes 1.pdf

# (a) Walking and Wheeling (Wheelchair Users)

The public realm in built-up areas should be an inclusive space, accessible to all users and all mobilities, with low traffic neighbourhoods, well-maintained surfaces and dropped kerbs, limited street furniture, and clear footways. Networks of greenways (off-road routes between settlements) and quiet lanes (on-road routes that give priority to walkers, cyclists, and horse riders) should be provided in rural and semi-rural areas for both recreation and to link communities. The aim should be to make routes as attractive and direct as possible. Overbridges or underpasses should be installed where routes are severed.

### (b) Cycling

The top priority is to enable all children to travel safely by bike to school if they are able and wish to do so; this would embed a change in attitude towards car dependency. There should be an expansion of dedicated traffic free routes in the countryside, towns and cities, and of areas where walking and cycling take priority over vehicles. This includes an expanded National Cycle Network funded by national government, with more off-road routes, as has been advocated in Local Transport Note (LTN1/20)12; also, greater and improved facilities for transporting bikes on public transport and for storing them at transport interchanges/ hubs and in public places. Electric bikes should be encouraged to replace the car for shorter journeys.

Cycling should be actively enabled and designed into all new developments, and existing and new roads, not merely encouraged or treated as an after-thought to provision for motor vehicles.

### **Policy 3 Public and Shared Transport**

**Public transport should be integrated affordable, reliable, attractive and carbon-free, based on 'one network, one timetable'**. This requires a single national public transport timetable, aligning all trains and buses on a model of co-ordinated and regularly repeated services, within which demand responsive transport to the most remote destinations can sit. Public transport should be regulated or franchised to allow combined and/or local transport authorities to provide the services and timetabling that meet the needs of their area.

Adequate funding will be essential and fares should be attractive relative to the cost of motoring. Mobility hubs where public transport and active travel modes are integrated should offer a variety of travel modes including bus, train (where feasible), bikes and e-bikes, electric vehicles and pleasant walking routes to the main destination.

Government should recognise a universal basic right to public transport – it is an essential utility. Rural residents require access to their local town. Both rural residents and visitors require access to the countryside without relying on the private car<sup>13</sup>. In remote rural areas mobility hubs should be based on minimal infrastructure and grow organically according to local needs.

<sup>&</sup>lt;sup>12</sup> Cycle Infrastructure Design, LTN1/20, 2020, https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120

<sup>&</sup>lt;sup>13</sup> Every Village Every Hour A comprehensive bus network for rural England' CPRE 2021 <a href="https://www.cpre.org.uk/resources/every-village-every-hour-2021-buses-report-full-report/">https://www.cpre.org.uk/resources/every-village-every-hour-2021-buses-report-full-report/</a>

Over the past 35 years, compared to the cost of private motoring, rail fares have increased by 1.5 times, and bus and coach fares have increased by 1.8 times.

### (a) Buses, Coaches and Shared Taxis/Cars

All buses should be sustainably fuelled. Bus priority should be applied on all major road bus routes. Dedicated busways should be judged on their individual merits in order to avoid negative outcomes. Demand Responsive services, such as various types of flexible bus and coach services or shared taxis, should connect main bus routes and remote rural areas. In rural areas Community Transport should provide access to services not available locally. Those involved in planning and running bus services should be statutory consultees for any major housing or commercial development to ensure that public transport is an attractive option. Requirements for bus transport should be enshrined in legal agreements for larger developments (of greater than 100 dwellings) and such agreements should be enforced and not time limited.

#### (b) Trams and Tram Trains

CPRE supports trams, particularly the concept of tram trains where trams are able to run on heavy rail lines. They allow rural dwellers to catch a tram at a railway station that takes them to the heart of the city, as on the German Karlsruhe Stadtbahn<sup>14</sup>. The city trains run in the region as a fast train and flexibly as a tram in the city.

### (c) Rail

Best use should be made of existing infrastructure with longer trains and platforms, up-graded stations, improved signalling, and re-use of unused track. CPRE welcomes all sustainable initiatives that improve the quality of rural life and enable access to the countryside – new and re-opened stations and lines, restoration of double track lines, addition of more passing loops, a faster roll-out of better quality rolling stock and local passenger trains. Land suitable for sustainable transport adjacent to existing railways should be safeguarded for that purpose. Rail investment, including light rail and tram, should be prioritised if it achieves CPRE objectives. Development around existing rail stations or new stations provides the opportunity to reduce car usage, but this benefit should not be allowed to outweigh other harms such as loss of Green Belt.

High Speed Rail may have a role in certain circumstances in the future. However, CPRE has particular concerns about the specific harm to landscapes, habitats and tranquillity resulting from intrusive infrastructure and noise associated with increasing the design speed of trains. The harm should be weighed carefully against the claimed benefits of additional capacity and time savings for travellers. These benefits are likely to be relatively modest for travel purely within England.

### **Policy 4 Sustainably Fuelled Vehicles**

**CPRE** supports the switch to vehicles and craft powered by alternatives to fossil fuels. The full life cycle of such vehicles from construction to operation and disposal should provide net gain for the environment. The production and use of alternative fuels including chemically stored electricity (batteries and fuel cells), hydrogen and biofuels should be carbon neutral, contribute to decarbonisation targets and minimise harm to the environment.

6

<sup>14</sup> https://www.kvv.de/en/index.html

For electric vehicles roll-out of charging points in public places and in domestic situations should be speeded up. Charging points should be easy to locate and universally available.

EVs are less polluting at the tail pipe than their internal combustion engine (ICE) alternatives and emit no greenhouse gas (GHG) emissions during use. However, concerns remain about particulate matter from tyre wear, fire risk from batteries and intensification of energy use.

## Policy 5 ICE (Internal Combustion Engine) Vehicles

ICE vehicles using fossil fuels should be phased out as swiftly as possible, using all the levers at the government's disposal – road pricing and taxation – and focusing on the most harmful vehicles. Although it is government policy to stop the sale of all ICE cars (and hybrids) by 2035 the long life of such vehicles means that the majority could still be around in the 2040s. Over their life cycle each would be emitting 1.2 - 1.6 times more  $CO_2$  than an equivalent electric battery vehicle ICE vehicles are the main source of transport climate emissions and air pollution, which is the top environmental risk to human health in the UK and needs to be addressed urgently I6.

### **Policy 6 Water Transport**

CPRE supports the preservation and enhancement of waterways such as by canal restoration. This facilitates access to and enjoyment of the countryside. CPRE will support proposals that encourage lower GHG travel (shorter, cleaner journeys). This includes non-motorised and low-powered boating (e.g. narrow boating). CPRE does not support marinas and other developments which would attract high powered vessels into sensitive environments. River and sea-going passenger ferries should be encouraged where they provide more sustainable alternatives to for example air travel. CPRE does not support the expansion of the cruise liner industry.

Passenger-carrying vessels are chiefly associated with leisure activities, from sailing through narrow boats to cruise ships. CPRE acknowledges that in leisure activities it is often the journey itself that is the attraction rather than the destination but would encourage people to choose holidays with lower environmental impact. International cruising has a higher environmental impact than just about any other holiday activity.

#### **Policy 7 Aviation**

Aviation is the most polluting and unsustainable mode of travel and airports are major generators of road traffic. On this basis CPRE opposes the expansion of existing airports and the construction of new ones. Access to airports should be based on sustainable means of travel. Where possible, the revenue from APD (Air Passenger Duty), scaled by journey length and seating class should be allocated to sustainable aviation research and development. Until and unless alternative aviation fuel replaces fossil fuels, high greenhouse gas impacts should be avoided by the use of realistic and practical alternatives to either scheduled or private flights including teleconferencing and rail. The aim should be to replace all domestic and short-haul air travel by rail.

CPRE concurs with the policy of the Climate Change Committee that 'There should be no further airport expansions in the UK until the Government has developed a 'capacity management framework' for aviation'. The industry needs to minimise pollution, reduce greenhouse gas emissions; and improve

<sup>15</sup> https://duquark.com/2019/06/03/environmental-impacts-of-internal-combustion-engines-and-electric-battery-vehicles/

<sup>&</sup>lt;sup>16</sup> Chief Medical Officer's Annual Report 2022: Air Pollution, Executive Summary and Recommendations: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/1121599/executive-summary-and-recommendations-air-pollution.pdf

tranquillity that particularly concerns the countryside, the vicinity of airports and National Landscapes<sup>17</sup> and National Parks.

CPRE policy measures underpin the importance of personal responsibility in relation to air travel. Should alternative fuels and power sources be proven, expansion should still be qualified in order to avoid sprawl into the countryside, reduce demand for new road infrastructure and avoid additional pollution<sup>18</sup>.

### CPRE policies on other aspects of transport relevant to our work

### **Policy 8 Reducing Travel Demand**

CPRE supports the use of policy levers to manage travel demand and reduce congestion and air pollution.

These include, but are not limited to, parking and zonal charges such as Nottingham's Workplace Charging scheme and London's Ultra Low Emission Zone (ULEZ). The revenue raised from such charges should be hypothecated to invest in sustainable public transport and active travel.

A new system of pricing for the use of roads should replace the current system of fuel and vehicle tax. It should be fair to all road users and introduced alongside the clear demonstration of a very high commitment to make public transport, walking and cycling really attractive for many journeys. Road use should be charged for according to the pollution, impact, damage and congestion created by the vehicle while having regard for the availability of good alternatives. The following issues should also be factored into road pricing schemes:

- The countryside is protected, and dispersal of road traffic into rural areas is minimised or avoided;
- A substantial proportion of the money raised is used for public transport, accessibility improvements and improving conditions for walking and cycling, especially in rural areas;
- HGVs, whether or not registered in the UK, pay more to reflect their greater road damage and social and environmental impact.

### **Policy 9 Parking and Parking Standards**

Parking and planning policies should promote and support sustainable travel choices, reduce the land-take of development, and reduce reliance on the private car. This should lead to a significant reduction in car parking. Maximum parking standards should be set for private non-residential and residential development. CPRE does not support new Park and Ride schemes<sup>19</sup>. Existing Park and Ride schemes should be fully integrated with bus and rail services.

The efficient use of land demands that good design should seek to avoid 'land-hungry' approaches to car parking, and to ensure it is well integrated with a high quality public realm and streets that are pedestrian, cycle and vehicle friendly.

<sup>&</sup>lt;sup>17</sup> Previously Areas of Outstanding Natural Beauty <a href="https://national-landscapes.org.uk/">https://national-landscapes.org.uk/</a>

<sup>&</sup>lt;sup>18</sup> Airport expansion has significant environmental risks, commission finds, IEMA, 2014, <a href="https://www.iema.net/articles/airport-expansion-has-significant-environmental-risks-commission-finds">https://www.iema.net/articles/airport-expansion-has-significant-environmental-risks-commission-finds</a> Pros and cons of Heathrow expansion 2017 <a href="https://www.economicshelp.org/blog/6083/economics/pros-and-cons-of-heathrow-expansion/">https://www.economicshelp.org/blog/6083/economics/pros-and-cons-of-heathrow-expansion/</a>

<sup>&</sup>lt;sup>19</sup> Park & Ride - Could it lead to an increase in car traffic? Parkhouse G. Transport Policy Vol 2 Issue 1 pp 15-23, 1995 https://www.sciencedirect.com/science/article/abs/pii/0967070X9593242Q

CPRE London<sup>20</sup> has shown the huge wastage of land to parking in London and offers eight ways to reduce it from redevelopment of parking space at retail parks and supermarkets to car-free housing development. The more parking that is available at a destination, the greater the incentive to drive.

### **Policy 10 Road Safety**

**Slower, enforced, statutory speed limits should be 40 mph on minor rural roads** (see footnote for definition<sup>21</sup>) and 20 mph through villages and other built-up areas. 'Safe Routes to School' are a priority and should be provided for all children, with adequate funding and dedicated local authority officer support.

Most rural roads in the UK have a 60mph limit. In 2021 there were 60% more fatalities on rural roads (of all types) than on urban roads. A study of single-carriageway rural roads estimated that a 10% increase in average speed results in a 30% increase in fatal and serious crashes<sup>22</sup>. Lower traffic speeds not only save lives but also create an environment in which walkers, wheelers and cyclists feel safer.

### Policy 11 Freight

**Freight policy and planning should address the journey of commodities from source to last mile delivery within urban and rural areas**. Whenever possible, heavy goods vehicles (HGVs) should travel on motorways and A roads. The road freight industry should improve its route management, to avoid subsidiary and minor roads, by reviewing the Sat/Nav system used and monitoring the use of the recommended and appropriate routes. The efficiency of goods' movement should be improved to reduce empty running. Any expansion of logistics/ warehousing sheds should demonstrate it will reduce road travel for both freight and staff and be located to maximise the use of rail/water wherever possible. Supermarkets should regularly appraise the logistics of moving fresh food and the use of local sourcing with regard to the suitability of method and sustainability of approach<sup>23</sup>. This information should be publicly available.

Parking for freight vehicles should be provided to accommodate drivers' statutory rest periods. Drivers should be discouraged from stopping in unsuitable locations by provision of convenient facilities for intraday rest and a range of options for serviced overnight parking.

Transfer of goods to rail or water should be encouraged by subsidies that make rail/water the most affordable option. Transferring goods by air is fundamentally flawed as it contributes to climate change; it should be the option of last resort.

CPRE supports the expansion of short-sea shipping and the use of inland waterways for freight as alternatives to road transport. Waterside land that is, or could be, used for cargo handling (usually bulk materials associated with construction, waste or recyclables) should be safeguarded for such development.

Further information on these road classes and the underlying data sources can be found here https://www.gov.uk/government/publications/guidance-on-road-classification-and-the-prima

 $\frac{https://www.gov.uk/government/publications/guidance-on-road-classification-and-the-primary-route-network-guidance-on-road-classification-and-the-primary-route-network-guidance-on-road-classification-and-the-primary-route-network-guidance-on-roa$ 

<sup>&</sup>lt;sup>20</sup> Parking Transformed, CPRE London, 2020, <a href="https://www.cprelondon.org.uk/wp-content/uploads/sites/10/2020/11/Parking-Transformed.pdf">https://www.cprelondon.org.uk/wp-content/uploads/sites/10/2020/11/Parking-Transformed.pdf</a>

<sup>&</sup>lt;sup>21</sup> Roads are classified as either 'major' or 'minor', according to the DfT - <a href="https://www.gov.uk/government/collections/road-lengths">https://www.gov.uk/government/collections/road-lengths</a>. Major roads include motorways and all class 'A' roads which usually have high traffic flows and are often the main arteries to major destinations. Minor roads comprise 'B' and 'C' classified roads and unclassified roads. Rural roads include all three of the minor road classes. Our policy would exclude A roads and apply in rural areas to:

B roads – roads intended to connect different areas, and to feed traffic between A roads and smaller roads on the network;

<sup>•</sup> classified unnumbered, sometimes known unofficially as C roads – smaller roads intended to connect together unclassified roads with A and B roads, and often linking a housing estate or a village to the rest of the network. Similar to 'minor roads' on an Ordnance Survey map;

<sup>•</sup> unclassified – local roads intended for local traffic. A majority (60%) of roads in the UK fall within this category.

<sup>&</sup>lt;sup>22</sup> https://www.brake.org.uk/get-involved/take-action/mybrake/knowledge-centre/road-design/rural-roads

<sup>&</sup>lt;sup>23</sup> https://www.thesterlingchoice.com/supermarkets-work-uk-food-suppliers-part-one/; https://www.4cassociates.com/supply-chain/localising-or-globalising/

Underused land around deepwater and inland ports should similarly be safeguarded for port-related uses such as rail interchange or manufacturing for re-export.

HGVs emit 16% of all surface greenhouse gas emissions and are much more difficult to decarbonise than cars or vans. E-cargo bikes offer a solution to last mile deliveries.

Rail freight trains currently emit around a quarter of the  $CO_2$  (carbon dioxide) emissions of HGVs per tonne kilometre travelled<sup>24</sup>. Cargo ships are by far the most efficient mode measured by energy used per tonne-kilometre<sup>25</sup> but nearly all burn fossil fuels. Therefore, a mix of measures is required to reduce climate emissions from freight.

### Policy 12 Transport Infrastructure and Links with Patterns of Settlement

**CPRE does not support road building other than in very exceptional circumstances**. Additional road infrastructure should be an option of last resort. Best use should be made of existing infrastructure noting that there is an increasing requirement for asset renewal, maintenance and demand management.

Car use is currently essential to many people living in rural areas but we should aim to change this through reducing the need to travel by car, prioritising sustainable travel choices and promoting more efficient use of cars, particularly higher occupancy levels.

Planning policies should contribute to reducing the need to travel by car by requiring large housing developments to be

- (i) located within or adjoining existing settlements, and
- (ii) designed to allow public and shared transport to penetrate the site without relying on diversion of other services.

Development proposals for new or existing roads should only proceed in very exceptional circumstances and should be considered against the following criteria:

- Is the best option for, and appropriate in scale to, the transport problem having been considered against a range of credible alternatives;
- Does not increase greenhouse gas emissions (as advised by the Climate Change Committee<sup>26</sup>);
- Reduces air, noise and light pollution;
- Improves biodiversity (e.g. verge habitats and hedgerows) adjacent to the route;
- Does not lead to traffic growth or congestion in other areas;
- Does not undermine public transport use, walking and cycling by making car use more attractive;
- Is consistent with national, regional, and local land use planning policies;
- Is introduced alongside measures to manage demand for use of the car;
- Does not generate additional development pressures on the countryside;
- Does not deprive more sustainable transport initiatives of scarce resources.

Funding new road infrastructure which largely benefits drivers takes scarce resources away from investment in sustainable transport. New roads generate induced demand with increases in traffic of up to 47% over 20 years. They have long lasting impacts on landscape and biodiversity, do not benefit the economy, and are associated with a highly car-dependent pattern of land development from housing

<sup>&</sup>lt;sup>24</sup> Decarbonising Transport: A better greener Britain, DfT 2021 <a href="https://www.gov.uk/government/publications/transport-decarbonisation-plan">https://www.gov.uk/government/publications/transport-decarbonisation-plan</a>

<sup>&</sup>lt;sup>25</sup> <u>https://ibir.deutschebahn.com/ib2018/en/group-management-report/environmental/progress-in-climate-protection/energy-efficiency-increased/</u>

<sup>26</sup> https://www.theccc.org.uk/publication/2021-progress-report-to-parliament/

developments to business and retail parks in the countryside<sup>27</sup>. Two examples of the devastating long term impacts of inappropriate road building are the A34 Newbury bypass and the M65 Blackburn Southern bypass.

# Policy 13 Air, Noise, and Light Pollution

### (a) Air Pollution

Government should adopt the World Health Organisation's guidelines for particulate matter and nitrogen dioxide levels<sup>28</sup>. Air quality monitoring should be improved. All proposed road schemes should have health assessments, and DEFRA, working with National Highways and Local Authorities, should be far more pro-active in addressing the problems causing air pollution.

The rise in the number of ICE vehicles has made the air in many areas of towns, cities, around airports and in the countryside poisonously dangerous, leading to a rise in respiratory and cardiovascular disease and deaths<sup>29</sup>. Regardless of air pollution targets, there is no clear evidence of a safe level of exposure below which there is no risk of adverse health effects.

### (b) Noise Pollution

Disturbance from traffic noise should be minimised using noise-reducing road surfaces and removal of surface irregularities, slower speeds, reduction of traffic and driver education. National government and national transport agencies should use CPRE's tranquillity methodology<sup>30</sup> as a basis for including tranquillity in a measure of the quality of the countryside. Local, combined and National Park authorities should use the methodology and refer to CPRE's mapping when developing policies in spatial and transport plans and strategies; and when making decisions on planning applications.

#### (c) Light Pollution

National and local lighting policy should protect existing dark skies, using CPRE's light pollution interactive map<sup>31</sup>, and ensure that new developments do not increase local light pollution. All new developments should have well-designed lighting schemes and be refused planning permission if they would cause light pollution in existing dark places. Street lights should be focussed downward, not overlap and be on low poles.

### **Policy 14 Clutter**

The clutter of road signs and street furniture should be reduced<sup>32</sup>. Local highway authorities should develop a clutter reduction policy in the Local Transport Plan that would protect and enhance townscape and countryside character. They should follow the guidance in the DfT Traffic Signs Manual regarding reducing clutter and design guides, and consult with interested groups and the wider public on installations and removals. They should undertake regular audits of road signs', and remove those that are unnecessary, repetitive or duplicated.

<sup>&</sup>lt;sup>27</sup> End of the Road? *The Impact of Road Projects in England* Report for CPRE, 2017, Sloman et al <a href="https://www.cpre.org.uk/resources/the-impact-of-road-projects-in-england/">https://www.cpre.org.uk/resources/the-impact-of-road-projects-in-england/</a>

<sup>&</sup>lt;sup>28</sup> WHO Air Quality Guidelines <a href="https://www.c40knowledgehub.org/s/article/WHO-Air-Quality-Guidelines?language=en\_US">https://www.c40knowledgehub.org/s/article/WHO-Air-Quality-Guidelines?language=en\_US</a>

<sup>&</sup>lt;sup>29</sup> Air pollution, Chief Medical Officer's Report 2022

 $<sup>\</sup>frac{https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/1121599/executive-summary-and-recommendations-air-pollution.pdf$ 

<sup>30</sup> https://www.cpre.org.uk/resources/mapping-tranquility/

 $<sup>{\</sup>color{red}^{\bf 31}} \underline{\text{https://www.cpre.org.uk/what-we-care-about/nature-and-landscapes/dark-skies/englands-light-pollution-dark-skies-map/ark-skies/englands-light-pollution-dark-skies-map/ark-skies/englands-light-pollution-dark-skies-map/ar$ 

<sup>32</sup> https://www.oldsite.cpre.org.uk/what-we-do/transport/roads/the-issues/road-signs

# **Policy 15 Transport Appraisal**

The transport appraisal system should be fundamentally reviewed, as called for by the Transport Planning Society<sup>33</sup> and others. Appraisal should engage with:

- delivery of the government's strategic goals (such as levelling up or net zero);
- the specific social and economic features of the location of the transport issue and how an intervention may affect it;
- other strategies, programmes, or projects with which an intervention may interact, including in a particular geographical area.

Appraisal should begin with the nature of the problem to be solved, the desired outcomes and consider all potential transport and non-transport solutions, including the benefits of a series of small-scale local improvements rather than just one major one. The economic benefit attributed to time savings by the appraisal system should be significantly reduced. Active traffic management as an alternative to new highway capacity should be tested more rigorously as an option. The approach to environmental appraisals and particularly to climate change should be more robust and all processes and outputs should be subjected to rural proofing. The over-reliance on the Benefit Cost Ratio as the estimate of value for money and scheme prioritisation should cease.

Investment decisions on transport infrastructure and services need to be weighted in favour of public transport and active travel and against travel by private car.

**CPRE** 

March 2024

<sup>&</sup>lt;sup>33</sup> The principles of transport planning, Transport Planning Society, 2018, <a href="https://tps.org.uk/tps-policy/the-principles-of-transport-planning">https://tps.org.uk/tps-policy/the-principles-of-transport-planning</a>