

## Transport for the North draft Strategic Transport Plan

### Friends of the Earth consultation response

#### Introduction

Friends of the Earth welcomes the opportunity to comment on the draft Strategic Transport Plan (STP). We are part of an international network with member groups in over 60 countries across the world. We also have a network of 26 local community groups across the North of England, campaigning and taking positive action to improve the environment in those places.

As such, we are very mindful of the fact that strategic decisions and policies made in the North of England increasingly have impacts both internationally and locally.

The vision of Friends of the Earth England Wales and Northern Ireland is that “by 2030, the next generation will enjoy an environment that’s getting better: a safer climate, flourishing nature, and healthy air, water and food.”

The development and implementation of the STP will have significant impacts on the realisation of this positive vision. This response sets out where the STP can, and should, be improved in order to maximise the possibility of achieving this for the benefit of communities and the environment.

This response has been prepared by Friends of the Earth’s regional campaigners in the North West, North East and Yorkshire and the Humber. It has been developed with support of campaigners from our local group network to whom we are grateful for their time and insight.

#### TfN’s statutory duties

Transport for the North’s development into a Sub-National Transport Body has been enabled by Part 5A of the Cities and Local Government Devolution Act 2016<sup>1</sup>.

This legislation requires TfN to prepare a transport strategy for the area. S102I(1) states that this must contain proposals for the “promotion and encouragement of **sustainable, safe**, integrated, efficient and economic transport facilities and services to, from and within the area of the STB.”

Furthermore, S102I(8) states that the transport strategy must have regard to:

(b) the social and environmental impacts in connection with the implementation of the proposals contained in the strategy,

(c) any current national policy relating to transport that has been published by or on behalf of Her Majesty’s Government,

Friends of the Earth is concerned that the Strategic Transport Plan fails to address these social and, particularly, environmental impacts with an appropriate level of ambition and, therefore, fails to meet the requirements of the Act.

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<sup>1</sup> <http://www.legislation.gov.uk/ukpga/2016/1/section/21/enacted>

## Climate change

National policy on climate change is underpinned by the Climate Change Act 2008<sup>2</sup> and the UK's international commitments to reduction of greenhouse gas emissions, in particular the Paris Agreement.

Alongside the long term target of reducing UK greenhouse gas emissions by at least 80% by 2050 (on 1990 levels), the architecture of the Climate Change Act 2008 sets out shorter and medium term five year carbon budgets. These budgets recognise the cumulative nature of greenhouse gases and are designed to accelerate early action on emissions reduction rather than leaving it to later in the period to 2050.

The fifth carbon budget under this regime<sup>3</sup> for the period 2028-32 is set at 1725 MtCO<sub>2</sub>e (a reduction of emissions of 57% by 2030 on 1990 levels). The UK Government has accepted the fifth carbon budget at these levels and so, it is our position, the Strategic Transport Plan must reflect that budget if it is to be consistent with national policy (as per S102I(8)c as above).

In 2016, transport became the largest emitting sector of greenhouse gases representing 26% of UK emissions.<sup>4</sup> Note that this figures consists of surface transport and domestic aviation – it does not include international aviation (which the STP sets out to facilitate with infrastructure connections to the region's airports). Very little progress has been made to date on reduction of transport emissions (2% reduction between 1990 and 2016) and recent years have seen a small year-on-year growth.

The Committee for Climate Change has issued advice to Parliament<sup>5</sup> recommending a target to **reduce transport emissions by 44%** between 2016 and 2030 and further reductions to near zero by 2050. This clearly represents a significant step-change in progress over the period of the Strategic Transport Plan.

Therefore, it is of grave concern that no targets are identified for emissions reduction in the STP. While the report contains welcome words recognising the scale of transport' emissions, it lacks any indication of actual emission reductions, resulting from the STP.

Of even greater concern is the fact that draft projections released by Transport for the North (and attached to this submission) identify that the best case scenario under the Strategic Transport Plan **result in only a 14% reduction** in transport emissions. This is an order of magnitude short of the CCC's recommendations and is therefore untenable, failing as it does to demonstrate sufficient compliance with national policy.

It is noteworthy that the UK Climate Change Act is based on limiting the global temperature rise to 2 degrees Celsius, by 2050. In 2015 the UK Government agreed to, and later ratified, the Paris Agreement on Climate Change which builds on the ambition of maintaining temperature rises (as close as possible) to 1.5 degrees. The CCC, in response have stated that we need to reach global net-zero carbon dioxide levels (the main greenhouse gas resulting from transport) by the 2040s. The TfN

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<sup>2</sup> <https://www.legislation.gov.uk/ukpga/2008/27/contents>

<sup>3</sup> <https://www.theccc.org.uk/tackling-climate-change/reducing-carbon-emissions/carbon-budgets-and-targets/>

<sup>4</sup>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/679334/2016\\_Final\\_Emissions\\_Statistics\\_one\\_page\\_summary.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/679334/2016_Final_Emissions_Statistics_one_page_summary.pdf)

<sup>5</sup> <https://www.theccc.org.uk/wp-content/uploads/2017/06/2017-Report-to-Parliament-Meeting-Carbon-Budgets-Closing-the-policy-gap.pdf>

projections indicate an at-best decrease of 67% by 2050, again woefully short of the net-zero recommendations.

## **Air Quality**

Air Quality is a significant public health and environmental hazard.

Over 7000 people die prematurely in the three Northern regions as a result of particulate pollution<sup>6</sup> and many areas of our towns and cities have been included in Air Quality Management Areas. Road transport is the primary source of both particulate and nitrogen dioxide emissions in the UK.<sup>7</sup>

Following successive court judgements against the UK Government, DEFRA has produced its Air Quality Plan<sup>8</sup>. This, and a further recent court judgement, require Action Plans to be developed in 23 local authorities in the North. This process entails the attainment of legal levels of nitrogen dioxide pollution “as soon as possible”.

The solutions to reduction of air pollution from motor vehicles are twofold:

- (a) Improve vehicle performance, through stronger mandatory emissions standards
- (b) Demand management, to reduce the distance travelled by high polluting vehicles

The Strategic Transport Plan clearly has a role in the second of these solutions. However, the STP fails to address air pollution in two key ways:

- (a) Under the Strategic Transport Plan, the demand for travel increases between 2015-2050 by a minimum of 27% up to 54%.<sup>9</sup> It should be recognised by Transport for the North that particulate matter emissions from electric vehicles are roughly equivalent to internal combustion vehicles due to the high level of non-exhaust emissions.<sup>10</sup>
- (b) The spatial distribution of the planned investment of over £70bn appears to be targeted at a “predict and provide” construction of meeting transport demand between cities. This needs to be balanced by a substantial level of support to local authorities to create more local solutions to the problems identified above.

## **Conclusions and recommendations**

Friends of the Earth welcomes some of the investment proposals in the draft Strategic Transport Plan particularly the development of rail infrastructure, including Northern Powerhouse Rail and Integrated and Smart Travel.

However, we are concerned that the bulk of the proposed investment priorities are in developing the road network on a “predict and provide” basis rather than managing demand and creating modal shift.

We are concerned that this will lead to a failure to meet Transport for the North’s statutory duties in relation to climate change and air quality. We are also concerned that individual projects will have

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[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/332854/PHE\\_CRCE\\_010.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/332854/PHE_CRCE_010.pdf)

<sup>7</sup> [https://uk-air.defra.gov.uk/assets/documents/What\\_are\\_the\\_causes\\_of\\_Air\\_Pollution.pdf](https://uk-air.defra.gov.uk/assets/documents/What_are_the_causes_of_Air_Pollution.pdf)

<sup>8</sup> UK plan for tackling roadside nitrogen dioxide concentrations – DEFRA – July 2017.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633270/air-quality-plan-detail.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633270/air-quality-plan-detail.pdf)

<sup>9</sup> Northern Transport Demand Model (NTDM) – Steer Davis Gleave for TfN

<sup>10</sup> Non-exhaust PM emissions from electric vehicles – Timmers et al (2016)

<https://www.sciencedirect.com/science/article/pii/S135223101630187X>

deleterious impacts on the natural environment (e.g. the Trans Pennine Tunnel and associated development).

We call on Transport for the North to significantly revise the Strategic Transport Plan to recognise the urgent, binding imperative of tackling climate change and air quality by ensuring that the final STP is consistent with the scientific evidence on both. Without this consistency, we consider that the draft Strategic Transport Plan will lead to significant negative impacts on the environment, and the health and quality of life of the people that Transport for the North is being established to serve.