

DELIVERING A SUSTAINABLE TRANSPORT SYSTEM: PLANNING FOR 2014 AND BEYOND

A response by the Royal Town Planning Institute to
Delivering a Sustainable Transport System:
Consultation on Planning for 2014 and Beyond
27 February 2009



RTPI

mediation of space · making of place

RTPI, 41 Botolph Lane, London EC3R 8DL,
A charity registered in England (262865) and Scotland (SC 037841)

Contact: [Rynd Smith](#), Director Policy and Partnerships
Web: www.rtpi.org.uk

Contact: [Rebecca Coates](#), Planning Policy Officer (England)
Web: www.rtpi.org.uk

27 February 2009

Contents

	Page
1. Introduction.....	2
2. Response in Principle.....	3
3. Response to Consultation Questions	4

1. Introduction

The Royal Town Planning Institute is the leading professional body for spatial planners in the United Kingdom. It is a charity with the purpose to develop the art and science of town planning for the benefit of the public as a whole. It has over 22,000 members who serve in government, local government and as advisors in the private sector.

This document responds to the Department for Transport's *Delivering a Sustainable Transport System: Consultation on Planning for 2014 and Beyond*.

The response has been formed drawing together internal consultations through our Transport Planning Network and comments involving the wider membership of the RTPI.

2. Response in Principle

The RTPI welcomes DfT's attention to the development and delivery of a sustainable transport system for England. However, members and policy staff have raised two broad areas of concern with the consultation document.

- The document makes only passing reference to the development of emerging National Policy Statements prepared under the Planning Act 2008.
- The document still does not appear to sufficiently consider and weight threats to the natural environment from climate change, or opportunities arising from the management of the transport network to mitigate and adapt to climate change processes.

A programme of National Policy Statement (NPS) preparation has now been widely discussed between Communities and Local Government and a wide range of stakeholders. One of these is a National Networks Policy Statement, at present envisaged to examine both strategic highway and rail networks. The RTPI views the integrated nature of this NPS as being of the utmost importance. It is therefore a matter of concern to see that the consultation document makes only limited reference (paragraph 4.9) to the emergence of the NPS and further appears to suggest that the only linkage between Delivering a Sustainable Transport System and the emerging NPS will be for road projects. Given the timing of this consultation, we consider that it could have set out a much clearer mechanism for integration of the policy development process in the draft with NPS development, whilst also making clear that the NPS will address integrated transport networks at the national level.

The RTPI considered that on the whole the consultation paper did not sufficiently recognise the threats to the natural environment from climate change or recognise that the management of the transport network could help the natural environment adapt to the impacts of climate change in the future. The Institute agrees with the conclusion that finding solutions that deliver long-term environmental benefits is a challenge, but argue that this challenge must be met and that there are proven measures – policy, fiscal, regulatory – that can solve transport problems and deliver for the natural environment, whilst sustaining economic growth and achieving the necessary drastic cuts in greenhouse gas emissions. The economic case for the challenge being met is broadly made out in Sir Nicholas (now Lord) Stern's report (2006) examining the economic effects of climate change and the RTPI would have wished to see a greater response to his analysis.

There were also some concerns that some of the 'challenges' identified in the document appear somewhat vague, open-ended and lacking in definition (e.g. performance indicators). Only one 'challenge' relates specifically to spatial planning or includes quantitative criteria.

As a general point in relation to the consultation paper, the Institute is disappointed that the five questions and the whole of Chapter 6, 'National Network Definition' appeared on the DfT website at a later date to the remainder of the document. Members commenting on the document downloaded the consultation paper on the day of its publication and only found out at a later date that the document had been added to. We were also unaware of any press release or information relating to the further details or when the change took place. In effect, whilst 'original' chapters had the benefit of the full period of consultation, members had to consider Chapter 6 and the five questions within it in a much shorter period of time.

3. Response to Consultation Questions

Question 1: Are there any additional challenges that we should add to the matrix? Or any challenges we should delete?

Cross Network (national policy)

Improve quality of life

The RTPI believes that across the national policy network the goal to improve quality of life should be supported by a challenge to improve the experience of non-transport users. This can be identified in the way that infrastructure providers recognise and address their concerns and needs. This also reads across into the equality of opportunity goal.

Cities and Regional Networks

Contribute to better safety and health

12. The RTPI also suggests that the escorting of children to and from school or for leisure purposes should be seen as an indicator for perceptions of safety. It may also have an impact on the choices caregivers have in securing employment or engage in other activities.

Improve quality of life

13. We agree that noise is a key environmental and quality of life challenge however it should also be recognised that a key challenge is not only to address transport noise in densely populated areas, but to reduce noise in the open countryside and to ensure the retention in the countryside and areas used for recreation of significant tranquil areas, with low ambient noise levels.

Question 2: Are there ways in which we could make any of the challenges clearer and easier to understand or manage?

Overall the RTPI consider that there is a need for greater clarity in the identified challenges by making them more measurable and realisable. Paragraph 3.2 identifies that challenges should be supported by sound evidence, and if possible, quantifiable indicators. We agree with this approach and consider that more indicators could and should be used explicitly.

Cross Network

Tackle climate change:

1. Whilst bearing in mind paragraphs 3.6-3.7, quantified reductions need to be measurable and realisable at all spatial scales otherwise transport interventions will not design in reductions in greenhouse gas, but expect others to deliver. Reduction targets must be binding on each transport authority and linked to funding.

Promote equality of opportunity

3. Measurable targets are required, however for practical purposes it is unclear how these would be set at the national level. The RTPI suggests that there needs to be a definition of 'disadvantaged people' in the document, building on paragraph 3.10. This paragraph could also be enhanced by identifying the interaction/linkages between land use and transport planning, with land use planning being undertaken at a strategic level to help minimise the need to travel and to increase the use of sustainable transport modes.

Contribute to better safety and health

5. The reduction of the social and economic costs of transport to public health extends beyond the issue of air quality impacts. The effects of noise on well-being and life chances, as well as community severance must also be captured together with the benefits of access to health care, recreation, employment etc.

6. Public health may not be improved if physically active travel results in people being exposed to elevated pollutant levels.

Improve Quality of Life:

8. The challenge of managing transport noise should be clearer at least by defining that noise levels would not be increased where levels exceed say 70dB. The EU Environmental Noise Regulations 2006 and the LDEN measure could be useful in this regard. Which other wider Government goals is transport noise to be managed against?

9. The RTPI believes that reducing the impacts of transport policy at a national level on the natural environment will lessen the imperative to protect our natural capital and to enable food production and natural resources to adapt to climate change.

10. Perhaps it is necessary to differentiate transport users into those travelling by private transport and those by public transport, walking or cycling. Improving the journey experience of non private transport users will make the eg public transport more attractive to those who prefer to use the private car, which in turn would increase modal shift from the private car and lead to reductions in greenhouse gas emissions (climate change).

Cities and Regional Networks

Tackle climate change

1. It would be beneficial when allocating targets to project design and delivery they should be linked to funds at an authority level to avoid the problem of defining the contributions across city and regional boundaries. Given the different timescales for the projects to be delivered, careful consideration will be required in arriving at an emission profile that is standardised to enable comparison. It is suggested that for national comparison a standard benchmark year be selected for example 2014 then 2020.

Support economic growth

2. Building upon the conclusions of the Eddington Report, it would seem to make sense for this challenge to be concerned with improving the reliability and predictability of journey times rather than merely maintaining them. It is also hoped that productive time also captures the time delays incurred by pedestrians due to severance and poor urban design. The indicator should not just relate to motorised or private transport users especially at a city scale. The challenge would tend to focus investment upon existing corridors possibly working against regeneration in those areas off main corridors.

4. In relation to the point 'facilitating conditions for the housing to be delivered', emphasis should be upon identifying suitable locations for new residential development in locations which can facilitate transfer of trips to sustainable modes of travel, for example at major public transport nodes.

Promote equality of opportunity

6. There is a need to understand how the enhancement of social inclusion is to be measured and used for investment purposes.

Contribute to better safety and health

9. Public health may not be improved if physically active travel results in people being exposed to elevated pollutant levels.
10. To reduce the social and economic costs of transport to public health extends to issues beyond air quality impacts. The effects of noise on well-being and life chances, as well as community severance must also be captured as well as the benefits of access to health care, recreation, employment etc.

Improve quality of life

13. Important to remember that it is not only the residents of dwellings where high noise levels are an issue.
14. The RTPI agree with the challenge of minimising transport's impacts on the natural environment and landscape however the supplement of 'net environmental gain' from the transport sector would be desirable. Impacts on the natural environment should be avoided rather than simply minimised in the first instance for new schemes. Solutions and minimisation to reduce the negative impacts of the existing transport network – such as lighting, noise, and air pollution, and habitat fragmentation should not be applied retrospectively.
15. While the challenge is of some value, perhaps a more widely cast challenge based on Manual for Streets would provide meaningful enhancements to the pedestrian environment, road safety and urban streetscapes.
16. In this respect we note that the focus for most transport users is at the local network, rather than at the interface with national and international networks. As before, perhaps we need to differentiate transport users into those travelling by private transport and those by public transport. Improving the journey experience of public transport users will make the product more attractive to those who prefer to use the private car, which in turn would increase modal shift from the private car and lead to reductions in greenhouse gas emissions (climate change).

National Networks

Tackle climate change

1. The RTPI agrees with the challenge of delivering quantified reductions in greenhouse gases consistent with the Climate Change Act 2008. Quantified reductions need to be measurable and realisable at all spatial scales otherwise transport interventions will not design in reductions in greenhouse gas, but expect others to deliver. The challenge should be set to reduce the emissions across the entire national networks not just infrastructure enhancements. There is a need for a clear delivery plan to ensure that each strategic transport sector – national networks, cities and regions, and international gateways – contribute to meeting this challenge.

Promote equality of opportunity

5. There should be real evidence of a contribution to reducing the gap in economic growth that focuses upon the differential rather than an assumed contribution within a region, since other interventions could erode the assumed outcome.

Improve quality of life

9. It is not only the residents of dwellings where high noise levels are a problem. National networks contribute to rural noise levels and this should be addressed.
10. As in respect to Cities and Regional Networks challenge 14, it is considered that this challenge is not demanding enough to deliver sustainable development. It should require the delivery of solutions that maintain and replenish the environmental capital enabling it to withstand and mitigate the effects of climate change in all its consequences. Given the scale

of national network interventions they should produce positive outcomes for environmental capital since it may be more difficult for local interventions to deliver positive outcomes.

11. Previous comments regarding the differentiation of those travelling by private transport and those by public transport apply to this point.

International Networks

Tackle climate change

1. It is unclear how this challenge will be delivered and over what timescale. Assuming that the increase in emissions in aviation in one year are to be offset by a reduction in emissions in another mode in the following year, this creates questions on how other networks or sectors are to deliver the aviation offset as well as their quantified reductions and whether this targets reducing overall emissions by 80% at all. There are doubts as to whether offsetting/emissions trading schemes can deliver the reductions required, so there must be some effort to make equivalent reductions in the transport sector. It is also unclear how the international emissions are to be measured and then proportioned to the individual transport authorities responsible for the regional and local networks.

2. Questions associated with the quantification of shipping emissions, its apportionment to other networks and transport authorities exist as with those for aviation emissions.

Improve Quality of Life

11. This contains point contain ambiguities in the use of the terms. For example the terms "limit" and "significant": does limit mean no increase or limited increase (and if so how limited) and from what date? How is "significant" to be defined?

As a general comment, the RTPI suggests considering the redefining of the health challenge to focus upon the risk of death and serious injury as the current claim that it provides a more meaningful indicator is not justified. Given that the majority of accidents occur on local networks and given the importance of child accidents to social equity, health and educational opportunities as well as the economic opportunities caregivers would have freed from a need to escort children, the proposed indicator works in completely the wrong direction. It is accepted, however, that the indicator may have some utility when judging international and national networks.

Question 3: Which of these challenges do you consider as most important?

Achieving meaningful reductions in carbon emissions whilst sustaining economic growth must be seen as the most important overriding challenge given the conclusions of the Stern Report and the importance of economic and environmental well-being set out in this paper. The other key challenge will be to make transport networks equally accessible to all given the trends are no doubt to introduce charges or increased fares which are socially regressive.

Some members considered that support to international aviation as a significantly growing source of climate change driving emissions should be given a lower priority than local networks, in the context of a demand management based approach to aviation policy. The focus on aiding regeneration, access to health care and employment is vitally important, whilst balancing the importance of international networks in a trade dependent island and the social and economic benefits they bring. The balance must also be struck between local transport investments and the benefits they deliver based on the sheer number of people who will benefit.

It is also important to recognise the different timescales over which the challenges may be delivered. Thus longer-term challenges need to be protected from short term expediency.

Question 4: Do you agree central government should lead on the development of solutions for national networks and international networks and that regional and local government should lead for the city and regional networks?

The RTPI believes that an integrated approach to national government objectives in transport planning needs to be established to avoid singular departmental funding and management of transport infrastructure, including roads. There should be separation of policy and funding from network enhancement and management.

Question 5: Are there any strategic corridors that should be added to the national network? Or any corridors that should be removed from it?

The A66 and A69 across the North East are important to provide access to Glasgow and the west coast ports and as such are important to address regional imbalances.

East Anglia (apart from Cambridge) is also isolated on the National Network diagram. Recognition of the importance of the A11/ London-Norwich train link would be useful in this respect.

The Institute is keen to understand the reasoning behind the omission of the A30/A303 and the Waterloo-Exeter rail line as a second national corridor between London and the South West.

Overall, these points illustrate the potential value of a spatial approach being taken to the further development of this document and to the emerging National Networks Policy Statement under the Planning Act 2008.

Question 6: Do you have any suggestions on how best to ensure that options for the national network and international networks and for city and regional networks are developed in a joined up way?

Individual agencies must be given clear incentives to work together. Where individual transport measures are being proposed then their contribution to higher tier networks should be established and contributions delivered by the higher tier agency.

While Regional Transport Strategies and Local Transport Plans should remain at the centre of a plan led system, augmented at the national level by clear National Policy Statements, it is suggested that Transport Fora should be established to actively consider information as it arises from transport studies and scheme designs. Such fora could be modelled upon the Steering Groups established for Multi-Modal Studies.

Question 7: Do you have any other comments on the approach, set out in this section, to taking forward the proposals contained in Towards a Sustainable Transport Strategy?

- The priorities for action are proposed to be based on geographical hotspots. To address social equity, community severance should feature in the geographical analysis.
- In establishing a range of economic, demographic and housing growth forecasts it is questioned how the department will follow a plan led approach through spatial planning,

particularly for growth areas and the extent to which other interventions such as the Government's EcoTowns should be catered for. It is unclear how the DfT will respond to the dynamics of fuel price and alternative fuels such as hydrogen.

- In developing a base case forecast with high and low forecasts, there is the risk that transport planning returns to the tradition of delivering to the high forecast predict and provide model. This is particularly challenging as a higher level of uncertainty seems more likely in the next 5-10 years.
- A focus on strategic national transport models would be better replaced by models that capture local and non-motorised travel patterns, since this is where most of the movement occurs.
- With regard to paragraph 5.8, perhaps the related paper 'Updating our Analytical Tools' should include proposals to improve land use/transportation modelling techniques, and to disseminate to a wider audience best practice arising out of this area of work?
- The evaluation of packages is stated in 5.10 to be based on the total carbon footprint among other elements. There will need to be some very clear advice to avoid double counting and difficulties in forecasting carbon emissions across networks.
- Comments were received over the perceived inability to deliver on the new approach to appraisal (NATA) environmental objectives and that this did not lead to confidence that understanding of cumulative effects will have any bearing upon individual investment decisions. The Australian approach should be examined.
- The Government needs to consider how longer-term objectives are not to be overridden by short-term objectives. This needs to reflect upon the environmental, social and economic dimensions of sustainable development.
- It is unclear how the DfT will ensure that packages as a whole deliver net positive outcomes as indicated in 5.14.
- The necessity of assessing small-scale interventions on the same basis as national-scale interventions is questioned. The standard of the test should be proportionate to the resources being sought. There is no need to force the comparison of such different transport interventions.
- When considering paragraph 5.19, perhaps a better appreciation of the cross-sector benefits is required when comparing transport and non-transport solutions? For example, providing ongoing subsidies to keep rural post offices or shops open in order to minimise travel. Or continuing to support free travel concessions for pensioners, which brings important benefits to the health sector through increased mobility of pensioners, reduced demand for 'dial-a-ride' or ambulance services.
- Regarding solutions that deliver long-term environmental benefits, forthcoming strategic planning and investment in transport – the National Policy Statements and their Appraisals of Sustainability, the options work planned for 2009, the recommendations from the National Networks Strategy Group, the funding given to support individual national, regional and local major transport schemes and initiatives, the transport White Paper planned for 2012 – need to be coordinated and integrated in a way that allows a strategic assessment of environmental losses and gains from the resulting programme. This assessment needs to happen at a stage where decisions can be altered to take account of its findings.
- The RTPI agrees with the consultation's conclusion that providing better access to the natural environment is a challenge that must be addressed, but argue that the challenge should highlight sustainable access.
- The consultation proposes 'a wider group of stakeholders' who will form a sounding board that can be consulted on the outputs of the National Networks Strategy Group. There should be environmental representation on this sounding board.

- There should be greater commitment from the Government to implementing 'cross network' national policy measures that will encourage the delivery of a more sustainable transport system.

Question 8: Would you like to see any significant changes (additions or deletions) to these Strategic National Corridors?

The response set out in question 5 in part addresses this point. In addition, it is presumed that SNC 10 (London to East Midlands, Yorkshire, North East and Scotland) largely follows the M1 to Leeds and then the A1 to the Scottish border. If this is the case then the markings on the map are slightly inaccurate in that the corridor is shown as passing to the east of Nottingham. In actual fact the M1 tracks to the west of Nottingham (and Leicester) and splits the land between Nottingham and Derby thereby affecting and effectively incorporating all three major East Midlands cities.

Question 9: Are there changes (additions or deletions) you would like to see to the strategic road infrastructure lists?

It is not clear the significance (in funding and development terms) of the proposed reclassifying of certain stretches of highway from regional importance to national importance. On the one hand this seems to suggest that such roads are likely to see development and additional resource (thus bringing questions of promoting long distance traffic and undermining the case for a more sustainable transport solution overall), although on the other hand reading the small print in Box 6.2 it seems to suggest that such reclassified roads may actually attract less resource than at present with little expectation of new resource before 2019 at the earliest.

Question 10: Are there changes (additions or deletions) you would like to see to the passenger rail service list?

No, the list seems adequate.

Question 11: Are there changes (additions or deletions) you would like to see to the rail freight service list?

None at present, although it is assumed that this has the potential to grow in the future with the possible construction of a nationwide network of Strategic Rail Freight Interchanges.

Question 12: Are there changes (additions or deletions) you would like to see to the air service list?

No.