



NW
TAR

Transport Activists' Roundtable

North West

www.nwtar.org.uk

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Mr. Matt Waltho,
Environment Policy Manager,
North West Development Agency,
Renaissance House, Centre Park,
Warrington, WA1 1XB.

Wednesday, April 22nd, 2009

Dear Mr. Waltho,

Scoping Report on the Sustainability Appraisal of the Draft Regional Strategy

The North West Transport Roundtable (NW TAR) is an umbrella organisation which represents the interests of organisations and individuals in the region that believe in sustainable transport and land use and a low carbon future. We have been in existence for over 10 years and have engaged throughout that period in the regional planning process, including taking part (twice) in the Regional Spatial Strategy Examinations in Public. We have representatives on a number of regional bodies, including the 4NW Regional Transport Group.

NW TAR operates under the auspices of the Campaign for Better Transport, formerly Transport 2000, and it is a member of Voluntary Sector North West (VSNW) and also North West Environment Link (NWEL).

NW TAR offer their comments on the Sustainability Appraisal Scoping Report of the Draft Regional Strategy in the order in which the report is presented:-

1.2 The Appraisal Team

The steering group membership does not represent environment, economic and social interests equally as it should. The voluntary sector is not represented at all and nor is the NGO environmental sector.

1.3 The North West Regional Strategy & 1.4.4 Context

These sections explain that the Regional Strategy will build upon the Regional Economic Strategy (RES), the Regional Spatial Strategy (RSS) and the Regional Housing Strategy (RHS) but make no mention of the Regional Sustainability Framework, Action for Sustainability (AfS). AfS is not mentioned until Chapter 2: 'Review of Relevant Policies, Plans, Programmes & Sustainability Objectives'. This implies a lower rating and must be corrected as regional sustainability frameworks sit on an equal footing with economic and spatial strategies.

continued ...

Table 2.1: Key Sustainable Development Policy Documents at International, National & Regional Level

It has to be highly questionable as to how *'The Future of Air Transport'* can seriously be listed as a sustainable development policy document. This should not be on the national list, but the *'NATA Refresh - Appraisal for a Sustainable Transport System'*, published in April after the Sustainability Appraisal document went out for consultation, should be. Also, within the regional list there are a number of economic documents which are clearly not "sustainable development policy documents" and should not be there, eg. The *'Regional International Trade Strategy'* and the *'Northern Way Growth Strategy'*.

4.2.1 Economic Development

This section places undue emphasis on the importance of GVA. This topic has prompted much debate. It does now seem to be generally accepted that GVA alone is far too blunt a parameter to adopt.

4.2.7 Transport

There has been almost no "sustainable investment" in highway construction. The opening statement of the first paragraph in this section is tautological – and the first sentence of the second paragraph is so sweeping as to imply that all the motorways named suffer stress throughout most of their lengths most of the time. This is far from the case. It is a fact that they would all become more stressed in years to come if traffic is allowed to grow exponentially and more sustainable policies are not adopted, but the government itself has accepted that the answer is not to build ever more highway infrastructure.

The statement in the last paragraph of this section about the need for better planning is a welcome one but there is no reference to the important role that 'smart choices' can play. The Northern Way has recognised that, cumulatively, a number of smaller 'soft' measures can have a significant impact.

6.3.3 Air Pollution

This section, whilst acknowledging the major contribution traffic makes to harmful emissions, fails to mention Air Quality Management Areas (AQMAs). These should not be overlooked. Planning guidance/ deliberations should take account of AQMAs - and areas on the cusp of being so designated.

9.2 Key Issues for Rural Area in the North West

This section approaches rural areas purely from an economic perspective. There is no reference to protecting the countryside for its own sake and the word 'conserve' does not even appear. There ought to be recognition that the countryside is an attractive feature which contributes to the tourist economy and that it is needed to provide food and grazing. If sustainable initiatives such as 'food webs' and 'local foods for local markets' are to amount to anything, then development focus should continue to be on urban areas and brownfield land and the countryside should be the last land to be built upon. The sequential approach to land use, endorsed by the extant RSS, must be perpetuated. These points should feed through into the rural proofing document due to be consulted upon in October.

We trust these comments will be of some value.

Yours sincerely,

LILLIAN BURNS, Convenor, North West Transport Roundtable