



Transport Activists' Roundtable

North West

www.nwtar.org.uk

NW TAR CORE GROUP

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Dear Transport for the North team,

CONSULTATION ON TRANSPORT FOR THE NORTH'S STRATEGIC TRANSPORT PLAN

The North West Transport Roundtable (NW TAR), which operates under the auspices of the Campaign for Better Transport (CfBT), promotes sustainable transport and land use and healthier lives. We espouse 'Smart Growth' and reducing the need to travel.

Our Comments

Transport for the North's raison d'être is summed up on the home page of its website: *"We are making a case for pan-Northern strategic transport improvements which are needed to support transformational economic growth"*. In other words, TfN's prime purpose is to evolve a transport strategy for the North of England for which it will work up a supporting economic case. It is not tasked with addressing any of the following:

- the first basic WebTAG/ transport appraisal requirement which is to ask what are the problems and what are the potential solutions, including non-transport ones?
- having to prove that economic benefits are greater than environmental disbenefits
- judging the sustainability/desirability of no intervention versus some intervention
- analysing how its proposals would affect quality of life/not making assumptions
- having to carry out health impact assessments on proposed interventions
- assessing how proposed infrastructure would impact on environmental capacity
- concerning itself with where the minerals and aggregates would come from for proposed new infrastructure/extra maintenance and how they would be transported
- prioritising public transport, active travel and smart choices/soft measures
- reducing the need to travel
- traffic generation at the local, sub regional, regional and pan regional scale
- climate change, carbon generation or air quality at different scales of impact
- assessing impacts of interventions on landscapes, dark skies or tranquillity
- the cumulative effects on populations of increased noise/ light pollution / odour
- the economic value of having a beautiful, unspoilt countryside
- whether any potentially affected agricultural land is the best and most versatile
- how many rural businesses would be lost by proposed transport schemes
- weighing up potential severance impacts on communities of transport schemes
- whether or not there is sufficient capacity and skills within the construction industry to build all the proposed schemes, even if the funding is available (there is inadequate capacity in the housebuilding sector)
- taking into account the public's preference, expressed in survey after survey, for funds to be spent on road safety & maintenance rather than new infrastructure eg. <https://www.transportfocus.org.uk/research-publications/publications/road-surface-quality-road-users-want-highways-england/> and also <https://www.transportfocus.org.uk/research-publications/publications/road-users-priorities-for-the-road-investment-strategy-2020-25/> *
* (1st priority: Enhanced safety, 2nd Journey time predictability, 3rd Improved surface quality)
- convincing the government it was wrong to set up TfN with such a limited remit

TfN is only required by law to 'have regard to' social and environmental impacts, not give priority to them or to arguments mounted by environmental NGOs – whose input was not sought for most of the strategies/ research published to date such as the freight and logistics strategy. In fact, the first that environmental NGOs knew of that strategy was when it was launched at a Northern TransPennine Study meeting in 2016 in Darlington. And, contrary to promises made, we have had no involvement in the 2018 updated report.

The very foundations on which the TfN strategic transport plan are based are fundamentally unsound due to TfN's extremely narrow economic remit. The result is that a 'strategic' plan has been produced that appears to be trying to include as many Councils' wish lists as possible. These include a large number of roads – which CPRE has shown will not solve the problems they are intended to in the long term¹. In any event, more roads require more money and natural resources for maintenance. Existing roads are inadequately maintained.

Yes, there are elements in the strategic plan which environmentalists can applaud - such as public transport improvements and smart travel initiatives. (Although insufficient consideration is given to the strategic role that can be played by buses and coaches). But we have to ask the obvious question raised by one of the rail proposals. This is - what is involved with an entirely new rail line between Manchester and Bradford? Such a line would run just to the north of the Peak District National Park through some outstanding landscapes. Without alignment details and an environmental appraisal, we cannot possibly comment on that proposal.

What we do know is that seriously upgraded roads are proposed through National Parks – both to the south of the Pennines and the north. From an environmental perspective, we would argue that any upgraded/new roads should only be considered as a very last resort anywhere - after all other options have been exhausted – but, in the case of these particular proposals they are entirely at odds with National Park purposes and cannot be supported. National Park purposes are supposed to rank amongst the highest considerations from a planning viewpoint, but the author of this submission can report – having served as a member of both the Trans Pennine Tunnel Study and the Northern TransPennine Study – that this has not been the case.

The author of this submission also served as a member of the M60 North West Quadrant Study until being, inexplicably, removed from it, causing her to miss the most recent study meeting. Apologies and excuses have since been forthcoming, but it remains a very odd state of affairs that the one study member who has consistently asked unwelcome questions about air quality issues in that quadrant area should find herself dropped from a circulation list. There is no foreseeable way that new and improved road corridors could be achieved in that geographical area without already existing Air Quality Management Areas suffering from worsened air quality. The establishment of a new national garden at Worsley New Hall within that area will not be anywhere near adequate to compensate. A very generalised promise on page 13 of the strategic plan about "*reducing emissions and impacts from air quality and carbon from transport*" is wholly inadequate.

TfN is not alone in trying to downplay air quality issues. It has happened in many local authority areas and it has happened nationally. Client Earth have yet again won another high court action against the government on air quality grounds. On February 21st, 2018 the UK government suffered a third defeat on successive cases at the High Court when judge, Mr. Justice Garnham, declared 'unlawful' the government's failure to require action from dozens of local authorities with illegal levels of air pollution in England. The judge ruled that the government's plans were seriously lacking and ordered urgent and additional measures including specific plans to tackle illegal levels of pollution in 33 towns and cities – many in the parts of England covered by TfN. The government have announced that they will not appeal the latest decision in the Supreme Court.

Although TfN's strategic plan is carefully worded to imply that environmental considerations are important, the assumption throughout is that improved connectivity is a good thing and should be encouraged to boost the economy. For instance, there is a promise to "*ensure environmental and sustainability impacts are key considerations in option selection*". But this assumes that there must be an intervention selected. Also, a significant proportion of the plan is devoted to in-depth economic analyses. There is no analysis of special protection areas/important environmental/flora and fauna considerations/historic assets/ancient woodland. This is a deeply flawed plan generated by a body with a very confined remit. It is not supported by NW TAR.

Yours sincerely, **LILLIAN BURNS**, Convenor, NW TAR E: BrLlIn@aol.com Tel: 01625 829492

¹ <http://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus>