

Welcome to Transport for the North's Strategic Transport Plan consultation!

As the sub-national transport body for the north of England, we are responsible for developing a Strategic Transport Plan (STP) that will help to shape the future of transport for our region. To ensure our STP reflects the priorities of everyone in our region, we are holding a virtual consultation which will give you the opportunity to shape our plan.

This consultation is your opportunity to influence the vision, ambitions, and strategic priorities for transport in the North of England.

How to complete this consultation

- 1. Please familiarise yourself with the STP and supporting material.** All of the information required to answer our consultation can be downloaded from our website: <https://transportfornorth.com/our-north/strategic-transport-plan/>. If you require adjustments to be made to the supporting documents, for example large print or translations, please contact us at STP@transportfornorth.com.
- 2. Tell us a bit about yourself.** To help us understand the needs of different groups in the North we are asking some demographic questions as well as whether you are answering in a personal capacity or on behalf of an organisation.
- 3. Answer the questions next to each of the 11 theme areas.**
- 4. Send us your responses.** Once you have finished the questionnaire, please return it to either of the following addresses.
 - a. Email: STP@transportfornorth.com.
 - b. Freepost: TfN Strategic Transport Plan

Our consultation runs until Thursday 17th August so please make sure we have received your response by that date.

What documents do I need to respond to the consultation?

The core documents for this consultation are the draft Strategic Transport Plan and its annexes including the Integrated Sustainability Assessment (ISA) and Habitat Regulations Assessment (HRA). We recommend reading these documents before responding to our consultation.

To help you answer the consultation we have also highlighted which sections of the Strategic Transport Plan are most relevant to each question.

A full list of documents relating to this consultation is provided in an appendix to this questionnaire.

What next?

We look forward to reviewing your feedback and comments. The responses will be used to help shape the final draft of the Strategic Transport Plan which we aim to publish in early 2024.

STP2 Consultation questions

Section 1: Tell us about yourself	
<p>Q1. Are you are responding as an individual or on behalf of an organisation? <i>(please tick one)</i></p>	
<input type="checkbox"/>	Individual
<input checked="" type="checkbox"/>	Organisation
<p>Q2. If you are responding on behalf of an organisation, please provide the organisation's name in the box below.</p>	
<p>CPRE, the countryside charity (formerly the Campaign to Protect Rural England), North West Regional Group, which consists of: Friends of the Lake District, CPRE Lancashire, Liverpool City Region & Greater Manchester and CPRE Cheshire</p>	
<p>Please only answer questions 3 to 11 if you are responding on your own behalf, and not on the behalf of an organisation.</p> <p>We are collecting demographic data to understand the impact of TfN's Strategic Transport Plan on different groups and geographies across the North so that we can meet the needs of everyone.</p> <p>Before answering these questions, please read our privacy policy to understand how we will store and use your data.</p>	
<p>Privacy Policy We have created this privacy policy to inform you about how your personal data is collected, processed and used when you visit the Transport for the North Strategic Transport Plan online consultation room.</p> <p>Our contact details Name: Gavin Legg, Governance, Data Protection & Contracts Lawyer, Transport for the North Address: 2nd Floor, 4 Piccadilly Place, Manchester, M1 3B Number: 0161 244 0888</p> <ul style="list-style-type: none"> • E-mail: Gavin.Legg@transportforthenorth.com • All of the personal information we process is provided to us directly by you for one of the following reasons: <ul style="list-style-type: none"> • To understand the impact of TfN's Strategic Transport Plan on different groups in the society and different geographies across the North so that we can meet the needs of everyone. • We use the information that you have given us in order to carry out consultation on the proposals contained in Transport for the North's Strategic Transport Plan. <p>We may share this information with Arup who will be processing the data on our behalf. Under the UK General Data Protection Regulation (UK GDPR), the lawful basis we rely on for processing this information are:</p>	

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting Gavin Legg at Gavin.Legg@transportforthenorth.com

(b) We need it to perform a public task. How we store your personal information

Your information is securely stored.

We keep any demographic data submitted for 24 months. We will then dispose your information by securely destroying all the information.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at Gavin.Legg@transportforthenorth.com if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint by contacting Gavin Legg at Gavin.Legg@transportforthenorth.com.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Q3. Please indicate whether you have read and understood our privacy statement.

(tick below)

I have read and understood your privacy statement

Q4. Please provide your postcode so we can link your feedback to the views of other people in your area (eg. M1 3BN)

Q5. Where do you live?

(please tick one)

<input type="checkbox"/>	North of Tyne (Newcastle, North Tyneside and Northumberland)
<input type="checkbox"/>	North East (Sunderland, Gateshead, South Tyneside, Durham)
<input type="checkbox"/>	Tees Valley (Stockton-on-Tees, Redcare and Cleveland, Middlesbrough, Hartlepool and Darlington)
<input type="checkbox"/>	North Yorkshire
<input type="checkbox"/>	Cumberland
<input type="checkbox"/>	Westmorland
<input type="checkbox"/>	City of York
<input type="checkbox"/>	East Riding of Yorkshire
<input type="checkbox"/>	City of Hull
<input type="checkbox"/>	North East Lincolnshire
<input type="checkbox"/>	North Lincolnshire
<input type="checkbox"/>	South Yorkshire
<input type="checkbox"/>	West Yorkshire
<input type="checkbox"/>	Greater Manchester
<input type="checkbox"/>	Cheshire East
<input type="checkbox"/>	Chester West and Chester
<input type="checkbox"/>	Warrington
<input type="checkbox"/>	Liverpool City Region
<input type="checkbox"/>	Lancashire
<input type="checkbox"/>	Blackpool
<input type="checkbox"/>	Blackburn with Darwen
<input type="checkbox"/>	Outside of the North of England
<input type="checkbox"/>	Prefer not to say

Q6. What is your age group?

(please tick one)

<input type="checkbox"/>	Under 18
<input type="checkbox"/>	18 to 24
<input type="checkbox"/>	25 to 34
<input type="checkbox"/>	35 to 44
<input type="checkbox"/>	45 to 54
<input type="checkbox"/>	55 to 64
<input type="checkbox"/>	65 or over
<input type="checkbox"/>	Prefer not to say

Q7. What best describes your gender identity?

(please tick one)

<input type="checkbox"/>	Man
<input type="checkbox"/>	Woman
<input type="checkbox"/>	Non-binary or gender fluid
<input type="checkbox"/>	Prefer not to self-describe another way
<input type="checkbox"/>	Prefer not to say

Q8. Do you consider yourself to have a disability, be neurodivergent or have a long-term health condition?

(please tick one)

<input type="checkbox"/>	Yes
<input type="checkbox"/>	No
<input type="checkbox"/>	Prefer not to say

Q9. What is your current employment status?

(please tick one)

<input type="checkbox"/>	Full time
<input type="checkbox"/>	Part time
<input type="checkbox"/>	Student
<input type="checkbox"/>	Seeking opportunities
<input type="checkbox"/>	Retired
<input type="checkbox"/>	Unable to work
<input type="checkbox"/>	Prefer not to say

Q10. What industry do you work in?

(please tick all that apply to you)

<input type="checkbox"/>	Agriculture, forestry & fishing
<input type="checkbox"/>	Mining, energy and water supply
<input type="checkbox"/>	Manufacturing
<input type="checkbox"/>	Construction
<input type="checkbox"/>	Wholesale, retail, and repair of motor vehicles
<input type="checkbox"/>	Transport & storage
<input type="checkbox"/>	Accommodation & food services
<input type="checkbox"/>	Information & communication
<input type="checkbox"/>	Financial & insurance activities
<input type="checkbox"/>	Real estate activities
<input type="checkbox"/>	Professional, scientific & technical activities
<input type="checkbox"/>	Administrative & support services
<input type="checkbox"/>	Public administration & defence; social security
<input type="checkbox"/>	Education
<input type="checkbox"/>	Human health & social work activities
<input type="checkbox"/>	Other
<input type="checkbox"/>	Not applicable
<input type="checkbox"/>	Prefer not to say

Q11. What is your ethnic group?*(please tick one)*

<input type="checkbox"/>	White
<input type="checkbox"/>	Black
<input type="checkbox"/>	Asian
<input type="checkbox"/>	Mixed
<input type="checkbox"/>	Arab
<input type="checkbox"/>	Other
<input type="checkbox"/>	Prefer not to say

Section 2: Vision

Please see pages 20 to 38 in the STP to answer this question.

Q1. To what extent do you support this vision?

(Please tick one)

<input type="checkbox"/>	Strongly support
<input type="checkbox"/>	Support
<input type="checkbox"/>	Neither support nor oppose
<input type="checkbox"/>	Oppose
<input checked="" type="checkbox"/>	Strongly oppose
<input type="checkbox"/>	I don't know / I don't have enough information

Q2. How can we improve or strengthen our vision for future transport?

Other than a reference to a zero carbon transport system, Transport for the North's 'Vision' does not touch on the third pillar of sustainability, the environment. There should be firm commitments in the Vision statement to conserving environmental capital, delivering biodiversity net gain and working towards climate change targets. (There is a reference to "achieving environmental net gain through aiding local nature recovery" on page 30 and to biodiversity net gains on page 81 of the Plan, but these references are somewhat lost in the general text rather than being a key feature of the 'Vision').

Also, whilst there is a promise to achieve 'improved health and wellbeing', this is open to interpretation. It would be a much bolder and clearer statement to hold out the promise of people being able to breathe clean air, wherever they live in the northern regions. As it is, there is a recognition in the body text of "the need to reduce health inequalities and poor health outcomes linked to the transport system which disproportionately impact deprived areas and communities" (p.32), the solution to which is seen as eliminating harmful levels of nitrogen dioxide – although, oddly, only "on the major roads network". Also, the monitoring metrics promote a reduction in air quality management areas. However, the major flaw is that the Plan's solution to solving air quality and climate change issues relies primarily on the electrification of vehicles, even though the Climate Change Committee (CCC) have shown that EVs alone will not reduce carbon emission sufficiently. The CCC, in their 2023 report to parliament, 'Progress in Reducing UK Carbon Emissions' (p.122) reveal that the current approach will meet only 38% of the required emissions reduction by the 6th Carbon Budget period.

'Health' also cuts across to safety and the number of people killed and seriously injured (KSIs). The Plan's aim is to reduce KSIs on the roads by 50% by 2030. This target lacks ambition. In addition, CPRE would take issue with the aim at the end of the 'Vision' statement - to 'enhance' journey times for all users. In survey after survey, the travelling public do not ask for 'enhanced' journey times. Whether surveyed as drivers or as rail passengers, they ask for reliable journey times around which they can plan their days. See links to Transport Focus surveys in our response to Q.2 in section 4.

Those are our comments specifically on 'The Vision'. However, the question here refers respondents to pages 20-38 of the Plan. These cover a great deal more than the 'Vision' statement. In effect these pages set out TfN's ethos – and it rests entirely on an economic approach – including with respect to decarbonisation, which is viewed from a carbon budget perspective. As explained on page 20, the foundation of the last strategy and of this one is the Northern Powerhouse Independent Economic Review (NPIER) of 2016, despite the fact that dealing with climate change has become much more urgent in the last seven years and despite huge changes in working practices affecting commuting. Some 16% of the working population are now based permanently at home and 28% work partially from home. Population forecasts have been amended downwards since the NPIER was written and the UK is gripped with high inflation, a feature that was absent from the economy for many years.

Climate change is mentioned in this chapter but, here again, it seems to be viewed entirely from an economic viewpoint, the statement being: ". we must continually reassess how carbon and climate change effects are considered within scheme appraisal to ensure sufficient value is placed on these factors" (p.30). This instead of a commitment to reassess the list of infrastructure schemes in the light of climate change (ideally, as the Welsh have done). It is simply inadequate to write a few fine words about "enabling modal shift away from car dependency" (on p.32) whilst, on the other hand, accepting that "the car is likely to remain a dominant mode for much of the North" (p.26).

Section 3: Vision and Strategic ambitions

Please see pages 20 to 38 in the STP and Annex 1 STP2 Vision, Ambitions & Objectives to answer this question.

Q1. Please rank the three strategic ambitions of our vision in order of importance and relevance to you (for example, if you think economic performance is the most important, put a tick in the box under 'most important' on the row next to economic performance. You can identify more than one ambition as 'most important'.)

	Most important	Moderately important	Least important
Economic Performance			✓
Decarbonisation	✓		
Social Inclusion and Health		✓	

Q2. Can you expand on your answer to question Q1?

Decarbonisation and working towards other climate change targets and commitments must be the top priority because if this goal is not successful, there will not be a livable planet on which people and economies can survive and thrive. (Also, see our response to Q.2, under Section 2: 'The Vision'). Our contention is that many of the ambitions in the strategic plan are not up to the challenge presented by the climate emergency. The purely technological solution envisaged for achieving decarbonisation is wholly inadequate and the vision and ambitions are too weighted to achieving economic goals at costs to the environment and the quality of life.

Our stance is also shared by the Climate Change Committee, the Government's statutory advisor on meeting the UK's climate targets, who published their annual progress report in June 2023. It includes a damning assessment of Government's failure to reduce society's car dependence. The report strongly criticises the Government's decision not to quantify the potential emissions savings from reducing car-kilometres in its Carbon Budget Delivery Plan (CBDP), published in March 2023. The CBDP was supposed to strengthen the commitments previously made in the Government's Net Zero Strategy (NZS), after the courts found the NZS to be unlawful because it inadequately quantified how the Government's statutory 'Net Zero' target would be met. (Ref. The Queen on the application of Friends of the Earth Ltd(2) Client Earth (3) Good Law Project & Joanna Wheatley v Sec. of State for Business, Energy & Industrial Strategy (2022) EWHC 1841).

The Climate Change Committee states that the decision to omit the emissions savings from reducing the growth of car travel in the CBDP "signals a lack of commitment to modal shift. A pathway that is almost exclusively technology dependent is likely to be less cost effective, entails higher delivery risk ... and risks missing out on opportunities to realise co-benefits [such as reduced congestion, decreasing air pollution and increased physical activity] to society".

The climate crisis is an existential issue facing both the UK and the rest of the world. To pretend that business as usual to grow the highways network and accommodate increased demand is appropriate is irrational. As the Climate Change Committee states, there is "A lack of urgency in the government towards dealing with emissions reductions. While the policy framework has continued to develop over the past year, this is not happening at the required pace for future targets".

Rather than declining in line with the necessary trajectory to reach net zero, transport emissions increased 3% in 2022 (Climate Change Committee, 2023 page 109) despite the fact that surface transport emissions need to reduce by 58% by 2035. This reduction will not be met by shifting to low carbon/EVs on the basis that the majority of private vehicles and most freight on the roads will still be internal combustion engine models by 2035. The only way that this target can be met is through demand reduction and reduction in miles travelled.

The Climate Change Committee makes it clear that no progress has been made on clarifying the role of car demand reduction. The Strategic Road Network only makes up 2% of the road network but carries 1/3 of passenger miles and makes up 10% of the carbon emissions of the country. On this basis, the Department for Transport and National Highways have a major responsibility to reduce road miles travelled and transport carbon emissions rather than planning for and welcoming traffic growth which is what RIS3 proposes. The Climate Change Committee state that “without policy action to embed a reduction in the need to travel by car or grow the availability and attractiveness of alternative lower carbon modes, traffic is likely to increase beyond the CCC’s pathway”. RIS3 is moving in the opposite direction that the Climate Change Committee states is necessary.

We maintain that the Department for Transport, National Highways and Transport for the North should be looking at reducing demand for strategic road use by 20% in line with the Welsh and Scottish Governments’ targets and with the Climate Change Committee’s report. Recommendation R2023-148 is: “Conduct a systematic review of current and future road-building projects to assess their consistency with the Government’s environmental goals. This should ensure that decisions do not lock in unsustainable levels of traffic growth and develop conditions (which can be included in the Roads Investment Strategy 3 process and beyond) that permit schemes to be taken forward only if they meaningfully support cost-effective delivery of Net Zero and climate adaptation”. On the basis that the Strategic Road Network carries 1/3 of all passenger journeys and 2/3 of all freight journeys and emits 10% of all CO2 in England, it absolutely has to lead on demand reduction otherwise climate emissions reduction targets as set statutorily by Government will not be met.

Q3. To what extent do you agree that our strategic ambitions for transport supports the North’s economic performance?

(please tick one)

<input type="checkbox"/>	Strongly agree
<input type="checkbox"/>	Agree
<input type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Disagree
<input checked="" type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	I don’t know / I don’t have enough information

Q4. How can we improve or strengthen our approach to economic performance?

The three pillars of sustainability, social, economic and environmental issues, that were evolved in the 1990s, are supposed to all be equal to each other. It is an unbalanced and inappropriate concept to regard two of them as providing a support act to the third (in this case the economy). And that is regardless of the assumptions in the strategic plan that more physical highway infrastructure will automatically bring economic benefits. Some 20 years ago, the Standing Advisory Committee on Trunk Road Assessment (SACTRA) produced a seminal report, ‘Transport & the Economy’. It proved that, in a mature economy such as that which exists in the UK, there is no automatic connection between more highway capacity and a bolstered economy. And that, in some areas, introducing new road space merely made it easier for people to commute out of their localities to work, rather than tempting new businesses to move into them.

In addition, the ‘Vision’ confines environmental issues to decarbonisation. Important as that is, there are far more other environmental aspects related to transport that TfN should be concerning itself with as ‘headline’ issues, such as greenhouse gases, air quality, the impacts of transport on landscapes, flora and fauna and the need to demonstrate biodiversity net gain.

Q5. To what extent do you agree that our strategic ambitions for transport will deliver the need for decarbonisation? *(please tick one)*

<input type="checkbox"/>	Strongly agree
<input type="checkbox"/>	Agree
<input type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Disagree
<input checked="" type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	I don't know / I don't have enough information

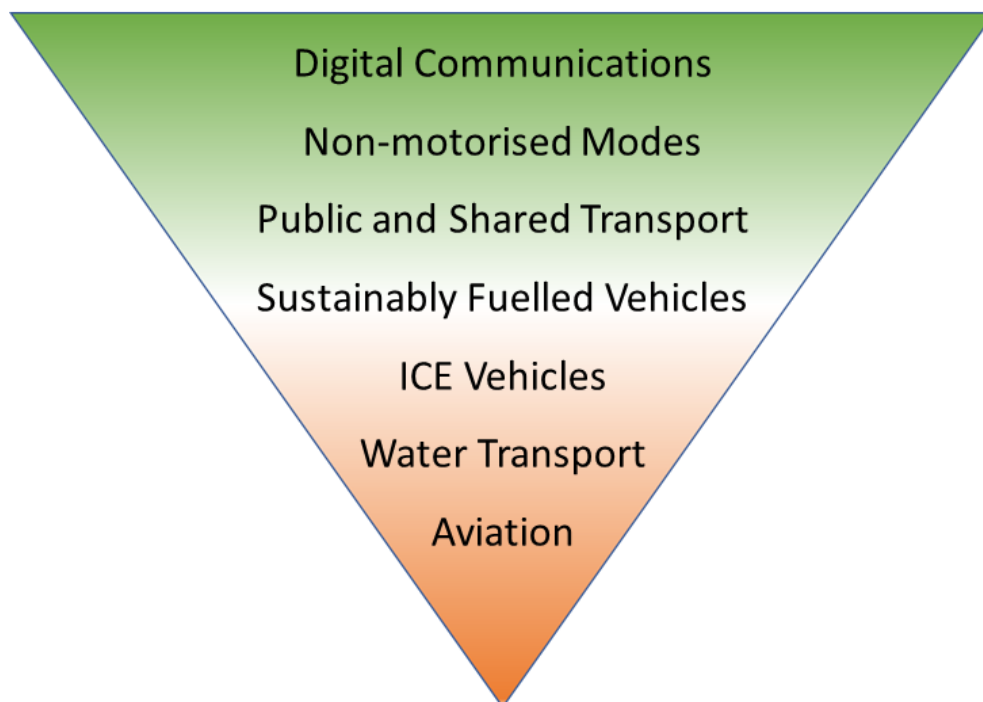
Q6. How can we improve or strengthen our approach to decarbonisation?

TfN would strengthen its approach by endorsing that of the Welsh government. Following analysis by an independent panel of experts, it has frozen new road building projects as part of its plans to tackle the climate emergency. TfN should focus investment instead on CPRE's sustainable transport hierarchy (ref. inverted triangle diagram below, taken from CPRE's emerging, revised, transport policy). SACTRA (see response to Q.4) produced another seminal report in the 1990s, 'Trunk Roads & the Generation of Traffic'. It showed that building new highway capacity generates more traffic.

The top priority, in order to reduce climate emissions, should be reducing the need to travel. This is where digital communications can play a major part. However, good digital connectivity needs to be universally available and, in the countryside, this should be delivered via underground cables or satellites rather than masts.

Deterrents to walking and cycling must be addressed and roads and junctions should be designed to avoid the primacy of vehicles. Public transport must be affordable, reliable and carbon-free and air travel should not be encouraged as it is the most polluting of all modes of travel. The STP is wrong to recommend catering for growth at northern airports. This would only increase harmful emissions.

CPRE's Sustainable Transport Hierarchy



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

Q7. To what extent do you agree that our strategic ambitions for transport will improve social inclusion and health?

(please tick one)

<input type="checkbox"/>	Strongly agree
<input type="checkbox"/>	Agree
<input type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Disagree
<input checked="" type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	I don't know / I don't have enough information

Q8. How can we improve or strengthen our approach to social inclusion and health?

Regarding health, although the draft strategic plan keeps repeating the mantra about reducing carbon and the need to be carbon free, it only mentions air quality a couple times in the body text and it doesn't mention the toxic pollution from car tyres, an issue which is more relevant than ever due to electric vehicles being heavier than petrol and diesel ones. Heavier vehicles are causing more pollution from tyres that contain about 400 organic compounds, many of them derived from crude oil.

Regarding the matter of social inclusion, TfN published a Socially Inclusive Transport Strategy, 'Connecting Communities', in April this year – although it qualified it with the following statement: *"the majority of the broader actions and investments necessary to deliver this are outside of our remit as a sub-national transport body"* (p.42). This statement underlines the shortcomings of TfN's position. It is not a delivery body. It describes itself in the Socially Inclusive Strategy (on p.42) thus: *"providing regional leadership, building evidence, supporting our partners and enhancing business cases in pursuit of our vision and ambition"*. In this case the 'partners' are National Highways, rail and bus providers, combined and principal authorities, ports and airports, the freight/logistics industry and, to some extent, National Parks as they are planning authorities – but not the travelling public.

Despite many fine words in 'Connecting Communities', TfN's Strategic Transport Plan is a prime example of the lack of social inclusion. Because, whilst all the 'partners' listed above have been involved during its development, the wider public and environmental NGOs have not. They are only being consulted now – at the draft document stage.

As TfN is a statutory entity responsible for producing policy direction for such a large part of the country, it should approach its strategic plan in a similar way to how local authorities approach their Local Plans – first with pre-publication public consultation, presenting various scenarios and inviting comments on them. And it should be obliged to take the feedback received into consideration.

Most importantly, TfN's strategic plan should tie together plans for major new developments with public transport needs much better than it currently does in order to secure social inclusion. For example, in Cumbria, the government has given the go-ahead to a new garden development south of Carlisle of some 10,000 houses (ie. a population approaching 25,000, based on the UK average household size of 2.4). Called, rather innocuously, 'St. Cuthbert's Garden Village', it would in effect be a southern extension to Carlisle, enclosed with a new link road. In view of the scale of this proposal, it should be treated as a priority in terms of strategic planning and yet National Highways are proposing to downgrade the A69 to Carlisle from being classed as a strategic route. This does not seem logical. Also, no strategy for public transport and active travel has yet appeared.

More to the south of the region, Trafford Borough Council have produced a 'New Carrington Moss Masterplan' for 5,000 homes and 350,000m² of warehousing, to be serviced entirely by new roads. Here again, plans for public transport and active travel are missing. This is not an uncommon set of circumstances, where local authorities press ahead with urban extensions/large developments but fail to make adequate provision for sustainable transport.

TfN could and should be taking a leading role in planning for new developments of this scale, ensuring that they have sustainable transport plans. They also need to incorporate light and water pollution into their own plan, as well as vibration and odour from traffic.

Section 4: User centric and place based approach

Please see pages 94 to 115 in the STP and the Annex 2 Policy & Places Framework to answer this question.

Q1. To what extent do you believe it is important for the STP to be people and place-based?

(please tick one)

<input type="checkbox"/>	Strongly agree
<input checked="" type="checkbox"/>	Agree
<input type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Disagree
<input type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	I don't know / I don't have enough information

Q2. How can we improve or strengthen our user-centric and place-based approach to the STP?

In as far as it goes, CPRE can welcome the following statement on page 95 of the Plan: *"it will be important across all place types, where new or updated infrastructure and services are proposed, that the integrity of the historical, visual and natural environment in those places is maintained and delivery authorities consider opportunities for enhancing those environmental assets wherever possible"*. But we would point out that it is not sufficient to simply ask delivery authorities to *"consider"* environmental assets *"wherever possible"*, this Plan should be reminding them that they are required to also 'deliver' biodiversity net gain.

We would also take issue with the nine distinct place types that TfN has devised, ie. large conurbations, commuter towns, rural villages and dispersed locations, rural town and fringe, transformational places, other urban, visitor destinations, towns with metropolitan counties and industrial places. When it comes to planning – no two places and no two planning applications are the same. Each needs to be considered on its own merits and shortfalls.

TfN's approach to transport users would be strengthened by paying more attention to the outcome of surveys of the travelling public conducted by Transport Focus. People's priorities are not speed but the reliability of journeys, whether travelling by road or rail. For road, ref: (<https://d3cez36w5wymxj.cloudfront.net/wp-content/uploads/2022/07/18160144/Strategic-Roads-User-Survey-2021-22-summary-report.pdf>) and <https://d3cez36w5wymxj.cloudfront.net/wp-content/uploads/2022/02/22121140/Strategic-Roads-User-Survey-six-month-report.pdf>). And <https://d3cez36w5wymxj.cloudfront.net/wp-content/uploads/2023/03/08160814/Transforming-rail-travel-%E2%80%93-what-do-passengers-want-6-March-2023-1.pdf> for rail.

TfN's place-based approach appears to rely to a large extent on asking 'partners' what they would like to see in the TfN strategic plan and pitching in those aspirations, despite often poor justifications. TfN does not survey communities about what features they prize most, what they want to see conserved and improved and what they want to see changed.

It is also only too apparent when reading the draft plan that there has been no or little attempt to seriously integrate land use and transport planning, yet this coalescence is absolutely essential to achieving sustainable communities, protecting both the built and the unbuilt environment, arresting climate change and cutting transport emissions. The Climate Change Committee noted, in their 2023 Progress Report, the lack of government guidance on this issue. A Land Use Framework promised by government last year and originally scheduled for this summer has been pushed to the autumn. Nevertheless, TfN should be scaling up its approach to land use, ensuring it is treated as a finite resource and properly managed.

Section 5: Outcome focused

Please see pages 121 to 125 in the STP and Annex 3 TfN Monitoring & Evaluation Strategy to answer this question.

Q1. To what extent do you agree with the approach to monitoring and evaluation of the STP2?

(please tick one)

<input type="checkbox"/>	Strongly agree
<input type="checkbox"/>	Agree
<input type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Disagree
<input checked="" type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	I don't know / I don't have enough information

Q2. Do you agree with the four targets we are proposing for 'right share' across different transport modes?

This question is confusing as there seem to be far more than four targets. It is also misleading because the heading to this Section 5 refers respondents to Pages 121-125 of the STP and to Annex 3 of the Monitoring and Evaluation when, in fact, the 'right share' metric is on page 117 of the STP.

We replicate here in italics the relevant text from page 117 and respond below each point.

“Following the lead of other transport bodies in the UK, we are proposing a 'right share' metric that will support efforts to reduce car dependency and create the capacity required to accommodate growth on our public transport networks so that:

→ The share of trips made by public transport increases to 15% by 2050 (currently 7%)

As stated in CPRE's response to Section 9, Q.2, our opinion is that this target is not sufficiently ambitious – most certainly not for urban centres. There should be a separate, higher target for towns and cities.

→ The share of trips made by active modes increases to 36% by 2050 (currently 27%)

According to the National Travel Survey for 2021 (published by the DfT in August 2022), 33% of the population use active travel modes nationally. It is not clear why the base figure should be lower for the northern regions. Nevertheless, a slightly higher percentage target figure ought to be achievable.

→ There is zero overall regional increase in private car vehicle mileage on the North's road network to 2045, against a baseline of 78.2bn in 2018

The target should be reducing the need to travel and reducing vehicle miles - an achievable goal, particularly if digital communications continue to improve.

→ Double the share of freight (measured as tonne km) carried by rail from 8.5% to 17% by 2050”

CPRE answer this point under Section 7 on rail, Q.2. We point out that this proposed 'doubling' of the target is from a very low base and we offer our support to the campaign being run by the Rail Freight Forum of the Chartered Institute of Logistics and Transport – to have 800 miles of track electrified. This would allow 95% of UK freight to be pulled by electric locomotives.

To conclude, the 'Right Share' metrics could and should be bolder – and they could be achieved if new road building was seriously curtailed, budgets for public transport and active travel were increased and serious effort was expended on reducing the need to travel.

Section 6: Roads

Please see pages 78 to 82 in the STP to answer this question.

Q1. To what extent do you agree with our Strategic & Major Road priorities?*(please tick one)*

<input type="checkbox"/>	Strongly agree
<input type="checkbox"/>	Agree
<input type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Disagree
<input checked="" type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	I don't know / I don't have enough information

Q2. To what extent do you agree with our approach that new road capacity should only be targeted when essential?*(please tick one)*

<input checked="" type="checkbox"/>	Strongly agree
<input type="checkbox"/>	Agree
<input type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Disagree
<input type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	I don't know / I don't have enough information

Q3. How can we improve or strengthen our Strategic & Major Road priorities?

The declaration that only essential new road capacity should be provided is commendable, but that is not the reality of what is being promoted. TfN should adopt the Welsh government approach (praised by the Climate Change Committee) that has resulted in it scrapping much of its roads programme.

There is a rare, passing, reference in the STP to the need to improve air quality at the bottom of page 81, included in a list of other worthy aims including the need to deliver net gains in biodiversity and lessen the noise and severance impacts of roads. How these are to be achieved is left to conjecture.

The key point to make here is that, although the STP pages referenced above the three questions on roads (78-82) do not contain the extensive list of roads schemes being promoted by Transport for the North, there are pointers here to documents that do – TfN's Major Roads Report of December 2021 and TfN's Freight and Logistics Strategy of November 2022. These documents belie the apparently innocuous words on page 82 of the draft STP. These are: *"While there may still be instances where we need to invest in additional highway capacity to realise our economic ambitions in the North, those economic ambitions primarily need to be achieved through changing the way we use our highways – especially as we look to accelerate decarbonisation"*.

It is a somewhat cynical and clearly deliberate tactic to not list or illustrate the road schemes in TfN's key strategic plan whilst, on the other hand, listing and illustrating all the rail schemes. We would like to draw attention to two important reports by Transport for the Quality of Life. 'The Impacts of Road Projects in England', published in 2017, drew on official evaluations from over 80 road schemes and four original case studies to provide a 20-year 'long view' of the impacts of road building (<http://www.transportforqualityoflife.com/u/files/170320%20The%20Impact%20of%20Road%20Projects%20in%20England%20FINAL1.pdf>). It found that: the road dominated approach to development leads to car dependent sprawl and any congestion relief is short-lived; environmental damage from road schemes is permanent and there is little evidence road schemes deliver economic benefits. 'The carbon impacts of the national roads programme', published in 2020, showed that the DfT's road investment strategy (RIS2) threatens the UK's commitments on climate change by adding 20 million tonnes of carbon dioxide to UK emissions between 2020 and 2032 when a reduction of 167m. was needed. (<https://www.transportforqualityoflife.com/u/files/The%20carbon%20impact%20of%20the%20national%20roads%20programme%20FINAL.pdf>).

The reality is that the STP's strategies and scenarios will fail to achieve TfN's net zero target by 2045.

Section 7: Rail

Please see pages 69 to 77 in the STP to answer this question.

Q1. To what extent do you agree with our Strategic Rail priorities?*(please tick one)*

<input type="checkbox"/>	Strongly agree
<input type="checkbox"/>	Agree
<input type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Disagree
<input checked="" type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	I don't know / I don't have enough information

Q2. How can we improve or strengthen our Strategic Rail priorities?

There are three main reasons why CPRE has felt obliged to tick 'strongly disagree' in response to Q.1. We do welcome the fact that TfN seems to be placing more emphasis on rail and are very supportive of some priorities listed, such as examining capacity on the West Coast Main Line (WCML) from Winsford to Carlisle – although we question why the Settle-Carlisle route is not seen as part of the solution to the WCML capacity issue and why west-east rail upgrades from Cumbria and from Cheshire are not seen as important. However, we have major issues with HS2, with vague references to 'new lines' that are not delineated and with the lack of ambition in increasing rail freight volume.

1. HS2 is described in the STP as being fundamental to delivering TfN's vision of a thriving North of England. CPRE cannot concur with this. HS2 does not stand up on environmental, social or economic grounds. The parts of it that would be over ground through Cheshire would present unconscionable noise issues in the flat landscapes, not to mention the problems of dealing with unstable ground conditions and the environmental impacts.

There are major unresolved issues around Crewe station, which Cheshire East Council (CEC) have been told by the DfT they will have to deliver, and north of Crewe. CEC wants to see a multi modal hub station that is integrated with the local transport network and an enhanced passenger concourse capable of accommodating the numbers that HS2 is expected to bring. They point out that the Crewe Hub will require a junction north of Crewe back to the HS2 Phase 2b main line and are calling for this to be funded from Northern Powerhouse Rail and have already indicated their intention to petition against the HS2 Bill as it stands.

Meanwhile, the construction of a new station near to Manchester Airport is, according to the transport minister, still subject to agreeing an appropriate local funding contribution from the Manchester Councils and the airport. And the stated intention to underground six miles of HS2 beneath Manchester city centre prior to it entering Piccadilly station has always been problematic and is still not resolved. In addition, there are disputes going on now about whether the HS2 station at Piccadilly should be over or underground, the GM mayor and Manchester City Council favouring the latter. Manchester City Council have also said they will petition against the HS2 Bill if their preferred option of undergrounding the HS2 station is not included in the HS2 Bill.

The business case for the western leg of HS2 Phase 2b has not been proven, the technical hurdles – including the amount of energy needed to power HS2 – are of mammoth proportions and the disputes with the local authorities seem to be unsolvable. CPRE N.W. Regional Group has yet to see evidence which would allow it to support HS2 per se or HS2 Phase 2b specifically. On the contrary, the case against HS2 continues to mount with a damning assessment by the Infrastructure and Projects Authority (IPA), which reports to the Cabinet Office and to HM Treasury. In July the IPA published its annual report on major projects. It gave a red warning for both of the first two phases of HS2 – from London to Birmingham and then on to Crewe. The red rating means the IPA believes that successful delivery of the project seems to be "unachievable". It also means there are "major issues with project definition, schedule, budget, quality and/or benefits delivery, which at this stage do not appear to be manageable or deliverable" and "the project may need re-scoping and/or its overall viability reassessed". The Crewe to Manchester phase of HS2 was given an amber grading, meaning it appears feasible, but significant issues already exist.

2. CPRE is supportive of the Trans-Pennine Route Upgrade east of Warrington but wary of what it might involve to the west. The route should be through Warrington Central and Birchwood – not utilising the Chat Moss line that crosses the environmentally sensitive Manchester Mosses. We therefore object to the apparent re-instatement of the Golborne Link in the rail plans. This was actually removed by HS2 which recognised that it would sideline Warrington Bank Quay and lead to the loss of direct routes to Edinburgh and Glasgow. *"A new line to be constructed from Liverpool to Manchester via the centre of Warrington"* (p.74) would have a major detrimental impact on the Manchester Mosses Special Area of Conservation (SAC) which encapsulates hundreds of hectares of peatland.

Also, *"a new line to be constructed from Manchester to Leeds via the centre of Bradford"* (p.74) could impact on the Peak District National Park and/or other important countryside. CPRE needs to see the proposed routes of these schemes – not just indicative lines – and to understand what type of construction would be involved and what the potential environmental consequences would be before coming to conclusions. In the meantime, TfN need to be fully cognisant of the fact that the Manchester Mosses are protected by an international designation and to the existence of a DEFRA-supported project for restoring the peatland which involves a partnership between the RSPB and United Utilities, just as it needs to fully appreciate the National Parks purposes which are enshrined in law. In England and Wales, the 'purposes' are: 'Conserve and enhance the natural beauty, wildlife and cultural heritage' and 'promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public'.

3. As for rail freight, the STP envisages doubling it by 2050. But this would be from a very low base (8.5% to 17%) over a period of 32 years. We expect to see a far greater ambition than this and would urge TfN to throw its weight behind the Chartered Institute of Logistics and Transport (CILT) campaign for a national freight electrification programme. The Rail Freight Forum of CILT, headed by Julian Worth, is lobbying for 800 miles of track that they have identified to be electrified. They estimate the cost would be circa £1.9 bn but point out that the A303 Stonehenge road scheme has been costed at £1.7 bn, arguing that 'bang for buck' the freight electrification scheme would deliver so much more and, by allowing about 95% of UK freight to be pulled by electric locomotives by the mid 2040s, considerable amounts of carbon would be saved each year. Currently, just 10% of British freight trains are hauled by electric locomotives. A YouTube film of a presentation made by Julian Worth to a technical seminar at Sheffield University about the case for freight electrification is here: https://www.youtube.com/watch?v=CN2kgh_iOPE and his Powerpoint presentation is here: https://www.thepwi.org/wp-content/uploads/2023/05/10_Electrification_An-Electrified-Freight-Network_J-Worth.pdf.

[See Appendix 1 for illustration of CILT's proposal]

Those are our three major issues in relation to rail, but they are not our only ones. We have many others. For instance, the age of much rolling stock in the north of England, inadequate rolling stock on some corridors leading to overcrowding and safety issues and the need for a station enhancement programme and reliable, regular weekend and evening services. We also do not only not want to see the closure of ticket offices at stations where they exist now; we want to see staff regularly deployed at smaller stations – a factor that would encourage more people to use them. We want to see the railways prosper and more people being attracted to use them on a regular basis. But for this to happen stations and trains need to be clean, safe and well run, stations need to be accessible and serviced by regular bus services, the cost of rail travel needs to be affordable and, the rest of the country outside London should be able to enjoy a ticketing system that includes rail and bus.

CPRE has always been a big supporter of rail travel and has consistently argued for improvements and upgrades to the rail system, including the stations. But, where any new major infrastructure is involved, anywhere, we are obliged – as environmentalists - to judge each proposal on its merit.

Section 8. International Connectivity, Freight and Logistics

Please see pages 82 to 87 in the STP to answer this question.

Q1. To what extent do you agree with our strategic priorities covering international connectivity, freight and logistics?

(please tick one)

<input type="checkbox"/>	Strongly agree
<input type="checkbox"/>	Agree
<input type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Disagree
<input checked="" type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	I don't know / I don't have enough information

Q2. How can we improve or strengthen our freight and international connectivity strategic priorities?

The strategic plan lauds the role of airports and ports in the movement of freight – the two most environmentally damaging modes of transport. Later in the text, there is an acknowledgement that *"both air and sea borne freight and passenger journeys are carbon intensive"* (on p.86), but the answer proffered to this is 'alternative fuels' – even though there is no likelihood of these being in general use in time to meet carbon reduction targets. This fact is not addressed and the Plan goes on to say *"TfN supports better utilisation of the existing unused runway capacity at northern airports to cater for growth"* (in freight) (p.86). How this statement fits with a decarbonisation strategy and the UK's commitments to tackle climate change is a conundrum. We would also make a more general point here in relation to alternative fuels – for any modes of transport. It is to draw attention to the fact that some alternatives to fossil fuels can also be environmentally damaging, for instance those that require crops to be grown at scale on farmland which could and should otherwise be producing food.

There is a recognition that rail freight moved by diesel trains currently produces 76% lower CO2 emissions than road freight, but this positive statistic is talked down by the remark: *"80% of road freight in the north is domestic traffic, most of which is short haul (making it difficult to justify the use of rail on commercial or efficiency grounds)"* (pages 85 & 86). We would also draw attention here to our response to Section 7 on Rail in this consultation (our point no. 3) which references the campaign by the Chartered Institute of Logistics and Transport on rail freight electrification.

It is apparent that the use of extensive warehousing is deemed to be a good thing. No consideration is given to the visual impacts of these or to their effects on traffic movements or air quality or to the fact that many are operational 24 hours a day. New developments and ideas coming through for more sustainable logistics are not discussed. There are alternatives to simply erecting ever more warehouses (usually on green fields) but these do not appear to have been considered.

This part of the plan is the most inconsistent and contradictory, along with the roads section.

Section 9: Local connectivity

Please see pages 88 to 95 in the STP to answer this question.

Q1. Which of the Local Connectivity policies do you think would benefit from a being considered at a Northern level?

(please tick as many as you feel appropriate)

<input type="checkbox"/>	Active Travel
<input type="checkbox"/>	Bus
<input checked="" type="checkbox"/>	Multimodal Hubs
<input type="checkbox"/>	Connected Mobility

Other (please state):

Coaches

Q2. Please expand on your answer.

CPRE would like to comment here that plans to double public transport use to 15% by 2050 are not sufficiently ambitious. Targets for urban centres should be higher. We note that the STP defers to Local Transport Plans for setting local targets but that does not mean that TfN cannot offer advice and quote best practice. For instance, Greater Manchester is aiming for 50% of all trips to be made by public transport and active travel by 2040.

We would also like to flag up the fact that coaches are not mentioned in this section and yet they are well suited to the more strategic level and to crossing over between that and the local level.

Schemes such as the Lincolnshire Connect should be analysed and considered for the North. This consists of larger vehicles, including coaches, being employed to cover the longer strategic routes between centres and smaller public transport vehicles servicing small towns and villages and connecting with the strategic vehicles.

Section 10: Implementation

Please see pages 118 to 135 in the STP to answer this question.

Q1. How do you think the Strategic Transport Plan will make a difference to you and your local community, to the economy and to the environment?

There is little evidence that local communities were much considered during the drawing up of this plan, and they certainly were not consulted. Yet many will be impacted by the road schemes that the plan is promoting and by poorer air quality.

The plan does nothing to discourage people from travelling unnecessarily and to encourage them to use digital communications whenever possible. It fails to present the true case in relation to the impacts of major transport infrastructure. Many communities find out too late.

There are numerous claims in the plan relating to the perceived economic benefits of transport infrastructure but there is not a similar discussion or analysis about impacts on the environment. Even so, it is apparent that this plan will fail to achieve its own net zero targets by 2045 in terms of annual and cumulative emissions. CPRE cannot give its endorsement to the plan.

Q2. The STP proposes reform to enable delivery of the ambitions and priorities actions. Please rank the five actions in order of importance.

	1 st Most Important	2 nd Most Important	3 rd Most Important	4 th Most Important	5 th Most Important
1. Importance of investing in maintaining existing assets compared with investing in new capacity.	✓				
2. Importance of investing in improved resilience of the transport network.			✓		
3. Importance of 5-year funding envelopes for transport to provide certainty and flexibility of funding.				✓	
4. Importance of managing investment as a process and of being able to transfer funding between silos					✓

5. Importance of aligning investment in other infrastructure such as digital or energy to enable transport outcomes.		✓			
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Section 11: ISA and HRA

Please see Annex 4a ISA2 Non-Technical Summary; Annex 4b ISA2 Main Report; Annex 4c ISA2 Appendices; and Annex 5 The HRA Main Report and Appendices to answer this question.

Q1. To what extent do you agree with the findings of the Integrated Sustainability Appraisal (ISA2)?

(please tick one)

<input type="checkbox"/>	Strongly agree
<input type="checkbox"/>	Agree
<input type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Disagree
<input type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	I don't know / I don't have enough information

Q2. To what extent do you agree with the findings of the Habitat Regulations Assessment (HRA)?

(please tick one)

<input type="checkbox"/>	Strongly agree
<input type="checkbox"/>	Agree
<input type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Disagree
<input type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	I don't know / I don't have enough information

Q3. Can you expand on your answer, referring to the specific findings, for example do you think there are any issues in the ISA/HRA that need to be addressed in the STP?

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Thank you for completing our consultation. We look forward to reviewing your feedback and comments.

Please send your completed questionnaire to:

Email: STP@transportforthenorth.com.

Freepost: TfN Strategic Transport Plan

If you have any questions about the questionnaire, please contact STP@transportforthenorth.com.

STP2 Consultation Documents

Each of the documents below can be downloaded from our website at <https://transportforthenorth.com/our-north/strategic-transport-plan/>. If you require paper copies of any of the supporting documents or require documents to be printed in large text or another language, please contact us on STP@transportforthenorth.com.

Documents in scope of consultation

- Draft Strategic Transport Plan
- Annex 1 STP2 Vision, Ambitions & Objectives
- Annex 2 STP2 Policy & Places framework
- Annex 3 TfN Monitoring & Evaluation Strategy
- Annex 4a ISA2 Non-Technical Summary
- Annex 4b ISA2 Main Report
- Annex 4c ISA2 Appendices
- Annex 5 The HRA Main Report and Appendices

Supporting documents

- NPIER: Capabilities, Local Data and Narratives
- Connected Mobility Hub
- Connecting Communities, Socially Inclusive Transport Strategy
- Economic Scenarios for the NPIER Final Report
- Strategic Rail Report
- Freight Logistics Strategy
- Future Scenarios Report
- Internal Connectivity Policy
- Major Roads Report
- Policy Position Statement: Multi Modal Hub
- Policy Position Statement: Rural-Mobility
- Policy Position Statement: Active Travel
- Policy Position Statement: Spatial Planning
- Transport Decarbonisation Strategy
- Transport related social exclusion in the North of England

Appendix 1

Rail freight electrification proposal by Chartered Institute of Logistics and Transport

