Written evidence submitted by Campaign for Better Transport (STO0059)

Defining objectives

1. **What is your understanding of the Government's strategic transport objectives? Are they the right ones, and if not, how should they be changed?**

Campaign for Better Transport believes strong strategic transport objectives are needed to guide policies across Government. Mode-specific strategies are much needed. However, without strong strategic objectives across all layers and sections of Government, such strategies may fail.

We believe that Government transport strategy should focus on achieving Net Zero, improving air quality, addressing physical inactivity, road danger, and levelling-up. These are currently articulated but not sufficiently prioritised. Economic growth should be aligned with these, given the importance of public transport for low-income households. In a 2016 report, Greener Journeys demonstrated that a 10% increase in local bus connectivity would produce a 2.7% reduction in employment deprivation. Ensuring everyone can access affordable, reliable and frequent public transport – as well as other greener transport modes – not only decreases reliance on polluting cars, but stops people being driven into transport poverty when they have no alternative but to own a car.

Achieving modal shift away from cars towards sustainable transport should be an objective in itself as well as ensuring the achievement of the high-level objectives outlined above. There is much evidence that the Government should commit to traffic reduction of at least 20% by 2030 against 2019 levels and an accompanying shift to sustainable transport modes in order to stay on track for Net Zero. The only way to achieve this is through re-prioritising policy delivery and funding towards sustainable transport modes, in order to improve public transport connectivity, frequency and affordability, alongside investment in safe walking and cycling. By making it easier and more convenient to use sustainable travel, the environment, air quality, the economy, and public health can all be improved.

2. **How well has the Government articulated the outcomes and objectives it seeks from the country's transport network? How could this be improved, and what impact would better-defined objectives have on transport planning and investment?**

The Department for Transport (DfT) currently produced mode-specific strategies, while also attempting to formulate proposed outcomes and objectives in the *Outcome Delivery Plan: 2021 to 2022*. We see no issue with having mode-specific strategies, as sufficient detail is needed in each one. An overarching strategic plan is also helpful to bring these together.

However, strategies are only as good as their implementation and often fail when other departments become involved. For example, the National Bus Strategy's objectives were well articulated and the right policies identified, HM Treasury has not given the funding needed to be fulfilled. The Williams-Shapps Plan for Rail called for an arms-length 'guiding mind' organisation to oversee the railways, but while a headquarters location has been chosen and a Great British Railways Transition Team established – the required legislation has not been introduced as it is not of sufficient priority to Number 10. The split of responsibility between DfT for revenue raising and HM Treasury for investment on the railways has stunted progress towards vital fares and ticketing reform.

There needs to be considerably better coordination within and between Government departments to ensure that objectives can be fully implemented in the long term and are less vulnerable to political changes. Strategic transport objectives also need to be supported and implemented across different departments, given that transport impacts on economic growth, health, access to education and employment, and levelling up. Publishing strategies is insufficient. There must also be means of scrutiny to ensure these objectives are delivered. An important element of ensuring delivery is further devolution of decision-making and funding so that transport plans can be better integrated with other policy areas such as planning and housing across relevant levels of sub-national government.

Using objectives to guide investment

3. **How well does the appraisal and decision-making process for new transport investment meet the Government's strategic transport objectives? How should this be improved?**

The apparent silo mentality of decision-making and funding has proven problematic. It leads to failure to deliver the right policies and a lack of scrutiny, with alternative modes of transport beyond private vehicles rarely considered. Replacing the current array of strategies with a strategic transport investment strategy and a local transport investment strategy which are aligned with the new Local Transport Planning process – which is supposed to be cross-modal – would be beneficial.

Greater weight should be given to cleaner, more environmentally friendly modes of travel in appraisals in alignment with the Net Zero, air quality, and levelling-up strategic objectives. This would allow for mode-neutral and objective-led consideration of options, both locally and nationally. There is currently a bias in policy and appraisal tools in towards car use and road building. The appraisal guidance assesses road schemes' impact on carbon generation individually rather than cumulatively, leading to their climate impact being ignored as it does not take into consideration the traffic-inducing effect of road building. As such, periodic reviews of the impact and success (or lack thereof) of schemes following completion should be implemented, so as to better inform future proposals.

4. **How should wider economic, environmental and social impacts be appraised and valued, including when the gains will largely be felt in policy areas other than transport?**

Schemes designed to support economic growth should only be granted approval if they have positive or at least neutral socio-economic and environmental impacts. It should be possible to appraise individual road schemes against alternative sustainable transport proposals. In line with the Climate Change Committee's recommendation, we believe the Government should undertake a Roads Review similar to the one done in Wales to assess whether planned schemes meet those wider objectives.

The DfT and associated agencies like National Highways should adopt a 'mode neutral' approach in order to find the best way to achieve its transport objectives on a particular corridor or in a particular area. For example, reversing the decision to build a relief road for the M4 in south Wales allowed consideration of sustainable transport alternatives. These are now performing much better than the new road would have.

It is crucial that funding for sustainable transport should be ring-fenced, particularly at the local transport authority level. For example, funding for local bus services is part of the block grant administered by the Department for Levelling Up, Housing and Communities, and it is left to authorities' discretion how this is to be allocated. This means that some authorities do not invest in economically and socially necessary bus services at all, as it is not a statutory requirement. There should be specifically designated rather than discretionary bus funding, and all funding of buses should move from to DfT to ensure consistency of policy implementation.

5. **How can longer-term certainty in planning be achieved in order to promote greater private sector investment from a range of sources?**

At a fundamental level, if the Government sets strategic objectives, the necessary funding to achieve them must be provided. The National Bus Strategy offered Local Authorities the opportunity to submit Bus Service Improvement Plans (BSIP) in order to access funding to "transform" services. The total ask of all local transport authorities' (LTA) BSIPs was £10 billion. However, only £1.08 billion of BSIP funding was actually allocated – out of a promised £3 billion. The successful LTAs received less than one quarter of their total ask. This sort of approach does not facilitate long-term planning.

Long-term funding to achieve objectives and provide certainty is crucial. Five-year funding packages (in which existing regulatory and statutory processes are included) should be introduced, with an expansion of the model used for combined authorities to other authorities across the country. This would bring opportunities to accelerate decision making, reduce uncertainty and avoid duplication of effort at national, regional and local level. The certainty required to generate private sector investment will only come if the objectives show a clear strategy for maintenance and management alongside expansion.

Improving coordination and alignment

6. **How effectively is strategic transport planning and investment coordinated across and between transport modes, including with reference to achieving modal shift?**

As mentioned, we believe modal shift should be a central strategic objective, and the Government should set a target for modal shift and traffic reduction. This needs to involve a central assessment of how much journey switching is required from private vehicles to each sustainable transport mode, as well as how this modal shift is then apportioned between urban and rural areas and the at each regional, subregional and local level. Cross-modal coordination requires significant improvement, which has evaded consecutive transport secretaries. However, having such overarching objective and assessment for how it is to be achieved, should help steer better coordination between modes.

7. **How could planning for transport infrastructure across government and coordination of policy (for example, with policy on energy, digital or planning) be made more coherent and streamlined?**

As stated above, there needs to be alignment between Government departments – particularly DfT, HM Treasury, DLUHC and Number 10 – to look beyond the narrow focus of economic growth in setting strategic transport and investment objectives. The current proliferation of short-term competitive funding pots for different is unhelpful and wasteful for local authorities short on capacity and capability to bid. As an example, coherent and streamlined planning of local bus infrastructure would be aided by bringing all bus funding under the DfT. This would ensure a single source of funding and provide certainty to local authorities and bus operators that routes and services as planned will be sustainable.

Importantly, greater integration between the spatial planning system and transport objectives is necessary. We welcome Active Travel England becoming a statutory consultee on planning applications. We recommend that in the same way the Office of Rail and Road should be consulted. At the local level, local bus operators providing services within a local authority should be required consultees on planning applications too. We also recommend the introduction of health impact assessments for proposals on the current Welsh model.

8. **How effectively is strategic transport planning and investment coordinated between national, devolved, regional and local government and other public bodies? Do the current division and distribution of powers help or hinder?**

We do not feel that the current division and distribution of powers is effective. There is insufficient strategic collaboration and coordination across the national, devolved, and local levels which not only produces disjointed policies, but occasionally friction. An example being central government's requirement for local authorities to introduce Clean Air Zones while at the same time not providing sufficient support for those local leaders seeking to act on air pollution.

Additional powers should be devolved to regional bodies and city regions. Greater Manchester, West Midlands and Greater Cambridge are good examples of best practice when it comes to the public and active transport agenda. They have set clear objectives and are following through on the policies necessary to achieve them and are well ahead of what the Government is attempting to do at the national level. This drive and determination at the regional level should be encouraged across the country with provision of the necessary powers.

The remit of National Highways should be updated to require it to work with local authorities to come up with solutions for particular road bottlenecks and congestion challenges that involve investment in wider transport rather than just road expansion. This will also help move away from the car and road bias in strategic thinking and address transport issues holistically.

Guidance should be issued to local authorities on the modal shift required for setting Quantified Carbon Reduction (QCR) targets, for both urban and rural areas. This will provide clarity and prevent councils from passing responsibility. This should accompany the publication of the long awaited (and still delayed) Local Transport Plan guidance.

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