

Consultation Response on Transport for the North Integrated Sustainability Appraisal

By Zero Carbon Yorkshire Transport Group, April 2018

1. Introduction to our organisation

Zero Carbon Yorkshire (ZCY) is a group of campaigners, academics and organisations, jointly initiated by individuals working at Schumacher North, the Oasis School of Human Relations, Friends of the Earth, Leeds TIDAL and the University of Leeds. It has developed into a broadly-based alliance of organisations and individuals from all parts of the region, all sectors of society and every walk of life, who are dedicated to ensuring that our region does all it can to contribute to tackling the urgent problem of climate change.

See <http://www.zerocarbyorkshire.org/about-us/> for further details.

2. Our Response

Our comments below respond directly to Q6 b and c only. However, they also have clear implications for the Strategic Transport Plan as a whole. (Wording from the consultation questionnaire is in italics).

The Integrated Sustainability Appraisal

The following questions are about the Independent Integrated Sustainability Appraisal. Please therefore read the Independent Integrated Sustainability Appraisal document before answering the following questions.

Q6a. Please provide any comments you have about the Independent Integrated Sustainability Appraisal, and its objectives, in the box below. PLEASE WRITE IN BELOW

Q6b. To what extent do you agree or disagree that a robust assessment of the Draft Strategic Transport Plan has been undertaken by the Independent Integrated Sustainability Appraisal?

Strongly Disagree

Q6c. Please provide the reasons for your response to Q6b.

In this response, we consider only Objective No.1, “Reduce greenhouse gas emissions from transport overall, with particular emphasis on road transport”.

This objective is very seriously inadequate. The projects resulting from the Strategic Transport Plan must form part of a whole transport system that remains in line with emissions targets set nationally.

Transport emissions in the North will need to reduce at least as rapidly as for the UK as a whole. Due to demand rising much more rapidly in Southern England than elsewhere, a much-publicised disparity in transport funding between the North and South has developed. If funding is equalised, as many Northern political leaders are calling for, then the Northern target can reasonably be expected to closely match the national one.

The Committee on Climate Change's (CCC's) 2017 progress report sets out the emissions reductions required to enable legally binding carbon budgets to be met.ⁱ It states "Domestic transport emissions should fall by around 44% between 2016 and 2030 and create options to allow near-zero emissions by 2050." Thus the ISA's target to "reduce" emissions clearly falls massively short of this.

A briefing available on the "TransportNorth!" website describes the results of unpublished modelling work carried out by yourselves. (This site is produced by campaigners that have engaged with TFN staff.)ⁱⁱ This briefing describes TFN's own projections of carbon emissions resulting from travel on all existing Northern roads, plus roads projects currently envisaged as being included within both the TFN Strategy and parallel road strategies of other responsible authorities. These projections show total road emissions would only fall by 9-14% by 2030. That meets your Objective 1 of "a reduction". However, it is nowhere near the 44% reduction needed to meet carbon budgets.

It is important to understand how significant this is by describing the background to the level at which national targets are set. The CCC's carbon budgetsⁱⁱⁱ are set at a level intended to meet intergovernmental agreements to mitigate climate change, through the Climate Change Act 2008 (CCA). At that time, the international community had come to a near-consensus view that average global temperature rise should not exceed 2C. (Unfortunately, the CCA's stated aim to "limit global temperature rise to as little as possible above 2°C", is somewhat too weak, due to a reluctance of the Government at the time to make a more robust commitment).

Since the CCA was passed, the Paris Agreement has been signed and ratified by the majority of the world's Governments (though the US has since committed to withdrawing). This reflects more recent scientific evidence and commits signatories "to pursue efforts to limit the temperature increase to 1.5 °C above pre-industrial levels." Carbon budgets have yet to be adjusted in line with this however, and legal action against the Government is currently in progress over this failure.^{iv}

If average temperatures exceed 1.5-2°C, it is likely to lead to increased extreme weather, through climate change, severe enough to not only cause great environmental damage but also economic damage that would ultimately cancel out the benefits of any growth achieved in the meantime. Clearly a failure to meet sectoral carbon budgets recommended by the CCC in any individual sector endangers that for the whole economy. Furthermore, in the light of the above current legal development, the flexibility to meet more stringent carbon budgets should be maintained.

We cannot accept TFN's claim that pursuing the Strategy in its current form would bring net long-term GVA growth. Further, we believe the likely environmental consequences of a failure to achieve appropriately revised emissions reduction objectives to be more serious than the economic ones. It is crucial that emissions from Northern transport are reduced far more rapidly from the levels currently projected.

3. Solutions

We at ZCY recognise that we are calling for very radical changes to the TFN Strategy in order to bring about very rapid emissions reductions. Above all, we advocate reduced travel and other measures to strengthen compact local communities. However, below we recommend action we believe it is reasonable for TFN to take.

This must be based on a recognition that the level of economic and jobs growth sought through developing the Transport Strategy is not achievable by the means it sets out. Climate objectives need to be strengthened in it to a level that properly protects both our economy and environment, which are of course inter-linked. Low –carbon technologies are not yet developed or adequately adopted in the North - and cannot reasonably be relied on to be developed - at a sufficient rate to achieve that growth, whilst simultaneously meeting these stronger climate objectives. TFN should therefore engage with other stakeholders, especially the relevant government departments, to seek solutions.

We propose that this would involve developing a radically different range of prospective transport projects. In particular, road transport is responsible for the vast majority current surface transport emissions. We would regard scaling back the major road investment programme to be essential. Instead, additional connectivity should be achieved through promoting a modal shift towards low carbon public transport and encouraging more walking and cycling within towns and cities. This becomes a more urgent consideration as measures to tackle poor air quality, including Clean Air Zones, start being implemented in most urban conurbations.

There is also a compelling case for digital connectivity, where a step change in adoption and improvements in technology can lead to greatly expanded utilisation that would replace the need for some physical connectivity.

We support TransportNorth!'s 10 Core Responses document^y, which covers a wider range of issues than our own response. We have one reservation, relating to Point 3, in that we would not support greater transport connectivity of any type, where it creates a conflict with the radically improved emissions reduction objectives that we call for.

ⁱ <https://www.theccc.org.uk/wp-content/uploads/2017/06/2017-Report-to-Parliament-Meeting-Carbon-Budgets-Closing-the-policy-gap.pdf> page 108, Table 5.1

ⁱⁱ <http://www.transportnorth.org.uk/wp-content/uploads/2018/03/STPcoreresponses.pdf> point 7.

ⁱⁱⁱ <https://www.theccc.org.uk/tackling-climate-change/reducing-carbon-emissions/carbon-budgets-and-targets/>

^{iv} <https://www.climateliabilitynews.org/2018/03/07/climate-accountability-uk-paris-agreement-plan-b/>

^v <http://www.transportnorth.org.uk/wp-content/uploads/2018/03/STPcoreresponses.pdf>