

THE CITY OF DURHAM TRUST

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Dear Sir/Madam,

TfN Draft Decarbonisation Strategy for Consultation

This letter provides the response of the City of Durham Trust to the above consultation document. The Trust is a registered charity, established in 1942, and its primary objective is to preserve, conserve and enhance for the benefit of the public the natural and built environment of the City of Durham and its surroundings. Transport has major impacts on the city and its hinterland, and because of this the Trust has for several decades been involved very heavily in planning processes which relate to future transport provision in its area.

Yours sincerely,

John Lowe
Chair, City of Durham Trust.

Q2. We have presented a range of information about present day emissions being generated by surface transport in the North, as well as the emissions we expect to be generated in the future without additional policy measures in place. Are there any other factors affecting these emissions, or additional areas for analysis, that would be important for us to consider?

The document appears to be quite comprehensive and we cannot identify any significant omissions.

Q3. To what extent do you agree with or disagree with TfN's approach to developing a Decarbonisation Trajectory?

Agree.

Q4. Please explain your response:

The use of four different scenarios should be helpful in identifying which policy interventions should apply in all scenarios and which may be of less value in some circumstances. We would have preferred to see more of the scenarios actually meeting the zero carbon target. Considering the dependence there will be on national policy, it would have been helpful to develop scenarios that respond to the implementation or otherwise of key measures such as increased fuel duty. For example, if fuel duty is not increased sufficiently, what other measures under the control of TfN or its partners would need to be implemented to compensate?

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Q5a. Choose the three Policy Gap Actions (for TfN to prioritise), that you consider to be of most importance:

We recommend the following Policy Gap Actions:

PGA8: Develop and implement comprehensive plans for the regional public transport network, such as Northern Powerhouse Rail and wider improvements to the rail network.

PGA12: Work with Government to support regional coordination of measures to improve logistics efficiency, including consolidation centres, mode-shift to rail and information democratisation schemes.

PGA13: Influence government to develop appraisal guidance that includes the full impacts of transport projects on carbon.

Q5b. Choose the three recommendations for national government, that you consider to be of most importance:

We support the following recommendations for national government as the most important:

2: Provide a substantial and consistent funding stream to Local Authorities to improve public transportation and active travel networks.

3: Develop a coherent plan for taxing and pricing car travel that accounts for reduced Fuel Duty revenues and incentivises key outcomes such as reduced overall car travel, more efficient road network operation and uptake of ZEVs.

12: Develop appraisal guidance that includes the full impacts of transport projects on carbon.

Q5c. Choose the three recommendations for local government, that you consider to be of most importance:

We support the following recommendations for local government as the most important:

1: Use marketing policies to re-build confidence in the safety and value of public transport.

5: Roll out parking policies to reduce congestion and make space for sustainable infrastructure.

11: Use local planning policy to promote '15/20-minute neighbourhoods', prioritise development close to public transport hubs and encourage car-free or car-lite development.

Q6. Do you feel we have missed any policy actions or recommendations?

Additional local authority resource is needed in for the design of active travel and public transport improvements – this cannot be left to depend on the use of external consultancy resources. This will require sustained funding and also retraining of existing staff away from highway engineering to sustainable transport. Staff development and disseminating best practice will be important. There is also a vital need to inform local councillors and ensure they are properly aware of successful interventions in other towns and cities.

Q7. To achieve the required demand management targets, where do you feel the policy focus should lie?

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Technology: Less focus

Demand reduction: More focus

Mode shift: More focus

Q8a. Choose the three Policy Gap Actions (for TfN to prioritise), that you consider to be of most importance:

PGA3: Work with Local Authorities and freight stakeholders to help aggregate large orders of ZEV vans and trucks across the North and overcome demand shortages.

PGA4: Through the Northern Powerhouse Rail Programme, support the government and Network Rail in identifying appropriate routes for electrification and associated implementation.

PGA5: Work with Network Rail and train operating companies to ensure service patterns are based around the progression of electrification and minimising the user of diesel-only trains.

Q8b. Choose the three recommendations for national government, that you consider to be of most importance:

Road

1: Strengthen the existing policy to phase out ICE car and van sales by 2030 to include hybrids.

2: Increase taxes on new ICE vehicles from the early 2020s, with rates escalating in line with emissions intensity.

3: Develop a coherent and comprehensive strategy for charging infrastructure, defining a role for local and regional bodies, providing public funding where appropriate and developing a regulatory regime that enables the private sector to invest and ensure interoperability.

Rail

7: In partnership with Network Rail, identify and fund a core network for electrification with the highest traffic density, then prioritise secondary, lower-density routes where alternative technology will be the permanent solution.

8: For routes where alternative technology is the long-term solution, provide funding to procure new rolling stock.

10: Support freight operating companies and rolling stock builders in the development of alternative technology freight locomotives.

Q8c. Choose the three recommendations for local government, that you consider to be of most importance:

1: Develop a model for delivery and maintenance of electric vehicle charging infrastructure, covering rapid hubs, on-street charging, public parking spaces, and council fleets.

5: Collectively adopt taxi licensing policies that require new vehicles to be zero-emission. This will need to be coupled with provision of charging infrastructure at taxi ranks.

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8: Engage with bus operators to set targets and standards for rapid roll-out of ZEV buses.

Q9. Do you feel we have missed any policy actions or recommendations?

Rapid progress towards developing Local Cycling and Walking Infrastructure Plans to cover all urban areas.

Considerable strengthening of the NPPF with regard to sustainable transport: all new development should be required to contribute to positive modal shift in line with climate change commitments.

Discouragement of development in locations with poor public transport accessibility, strengthening the protection of town centres. Out-of-town car dependent retail should see a decline. Facilities which exclusively or predominantly serve car access, such as drive-through food outlets, should not be granted planning permission.

Categorisation of rural roads and lanes to concentrate journeys on main roads and restrict motor traffic use of narrower lanes to form a cheap and effective active travel network.

More actions are required to support bus travel. Investment in new rail capacity will play an important longer-term role in transport decarbonisation: locally, reopening the Leamside Line will help to increase rail journey opportunities and attract travellers out of cars. With relatively long project lead times, however, we desperately need to progress with carbon reduction in the shorter term via demand management and modal shift. TfN is right to identify that a high proportion of carbon emissions from personal travel come from longer-distance car journeys which are hard to replace with active travel. For bus travel to become more attractive we need greater co-ordination of public transport, including subsidy and co-ordination of services and interoperability of tickets. Local authorities may require additional powers and funding, and these should not be made conditional on having an elected mayor, for example. The City of Durham Trust would support additional actions to seek to influence national government in this area of policy.

Q10. Are there any important potential wider risks or benefits that you feel have not been considered?

If policy focuses mainly upon replacing ICE vehicles with electric vehicles without also achieving significant reductions in the need to travel it will have failed to address the underlying social justice failures evident within the current national and local approaches to transport policy, as noted on p. 74 of the document, and could well exacerbate them: see also next box.

Reductions in the demand for travel and in the long-distance transport of goods can strengthen local economies through increased local demand, production and supply and can lead to the revitalisation of local facilities such as shops, cafes, pubs etc. Less dependence on long and transport-intense supply chains can be part of the clean growth dividend.

Reduction of urban speed limits coupled with the provision of infrastructure for, and prioritisation of, active travel modes, should reduce the numbers of people killed or seriously injured in road traffic collisions. There would also be mental health and social benefits resulting from increased social interaction.

Q11. Are there any parts of the population that you think will be disproportionately impacted by transport decarbonisation? Why?

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People whose work cannot be carried out at home and who also cannot afford to move to live closer to their work, and those lower-income families who are dependent on access to distant facilities for shopping, education, health care and other services. This requires careful co-ordination of planning, health, education and housing policies to ensure that lower income groups are not disproportionately impacted by increased travel costs and/or worsening of access to employment and other opportunities.

Q12. In addition to the Government's proposed measures, documented in their Net Zero Review, what additional actions could TfN take to ensure that all parts of the population benefit from transportation decarbonisation?

Place less emphasis on prestige transport projects which will primarily benefit those parts of the TfN population which are closest to London. Instead recognise that the distinct transport decarbonisation issues affecting the populations of the northerly part of the area will not be adequately met by trickle-down approaches developed from the viewpoint of the M62 corridor.

Q13. Are there any clean growth opportunities that you feel have not been considered?

Harness the untapped energy that is available in flooded abandoned mine-workings as an alternative contribution to the total energy mix. If local energy sources are not exploited, electricity required to decarbonise the heating of buildings will exhaust capability of the grid to deliver sufficient zero-carbon electricity for transport.

Q14. Are there any other areas where TfN should focus its future decarbonisation analysis?

It would be useful to build up an evidence bank of successful urban interventions which can be drawn on by local authorities when they engage in community consultation. Demand management and active travel improvements will require a period of rapid and unprecedented change to the urban environment, and attracting public support is vital.

The City of Durham Trust is concerned by the poor quality and lack of ambition in Travel Plans submitted and agreed as part of the planning process. The initial modal share can be more car-based than the modal share prevailing locally, and the targets for modal shift are often too small, yet nevertheless inadequately supported by the proposed interventions. There is a fundamental disconnect between the targets for decarbonisation which the UK is committed to, the levels of demand reduction these will entail, and the actual modal shift targets proposed in typical Travel Plans. A regional evidence-based approach to setting such targets would avoid any fear of losing inward investment if a neighbouring authority sets less demanding criteria.

Q15. For each of the 'priority activities to 2025' identified by TfN, which role do you feel TfN is best placed to fulfil? (1 = lead, 2 = support, 3 = not a role for TfN)

SD1: 1
SD2: 1
SD3: 1
SD4: 2
SD5: 2
SD6: 1
SD7: 1

CGA1: 3
CGA2: 2
PGA14: 3

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CGA3: 2

CGA4: 2

SD8: 2

CGA5: 1

CGA6: 2

PGA10: 2

PGA8: 2

PGA9: 2

SD9: 1

CGA7: 2

PGA2: 2

PGA3: 2

PGA12: 2

CGA8: 2

PGA4: 3

PGA5: 2

SD10: 1

PGA13: 1

SD11: 3

SD12: 2

Q16. Of the ‘priority activities to 2025’ identified, choose the three which you consider to be the top priority for urgent action:

We support the following ‘priority activities to 2025’ as the most important:

SD1: Regional route-map for transport decarbonisation

SD4: Exploring the relationship between transport decarbonisation and transport-related social exclusion (TRSE) (inclusive of PGA11)

CGA5: Supporting a Demand Management Narrative for the North.

Q17. Are there any other potential activities that you feel have not been considered and could be effectively delivered by TfN?

Overall this is a well evidenced plan, and the City of Durham Trust supports its high-level findings, though not all of its detailed proposals for how delivery should be achieved. It is good to see TfN highlighting policy areas where national government needs to go further, but it is also important that the document’s evidence is used to convince local delivery partners of the urgency of these issues. The challenge will be in creating momentum, especially among local authority partners who are probably under-resourced for the pace of change that has to be delivered. It is also essential that decarbonisation at the local level is integrated into local authority planning, place-making and with the social justice agenda.

There must be a role for civic amenity organisations such as the City of Durham Trust in developing such work as the “clean mobility vision for the North”. The “policy baskets” for different place typologies are another area in which local organisations may be able to help.

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There urgently needs to be examination of the scope for the Workplace Parking Levy, reduction in parking provision, and congestion charging. Some authorities in the area have introduced regressive charging zones which penalise bus operators but do not charge private car users. TfN could take a lead on this.

The other main concern is the evaluation of progress only at 5 year intervals, with the next being in 2025. An interim evaluation point of 2023 is needed to give early assurance that the plan is on track.