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3rd April 2023

**SUBMISSION TO CONSULTATION: “Draft National Policy Statement for National Networks” deadline 6.6.2023**

This is a submission to the above consultation. We have concerns about extensive omissions and seriously problematic assumptions throughout the main consultation document offered on this topic, meaning there was little utility in responding to your survey. In fact, we actually think your main consultation document needs substantial revisions and the consultation should be abandoned and only re-started after this is done.

**Omissions:**

Electronic Road Pricing: Everyone with a serious interest in transport knows that there is and will continue to be diminishing revenue from vehicles as ICE ones are replaced by EVs. This means that road pricing must be introduced to replace fuel duties which will diminish over time. In a country with a 14-year backlog of road repairs, untold pavement repair needs and a long history of failing to support Active Travel, it is clear that ERP money will be needed throughout the country. No mention of this vital issue is made in the core document for this consultation. This is exceptionally inappropriate when considering infrastructure needs since the levels of future ERP charges set can be used to diminish the need for new road infrastructure, saving resources. Clearly, the Government is being made aware of this, for example by a report of the House of Commons Transport Committee recently.[[1]](#footnote-1) We certainly do not want to see any more trunk road building, but traffic reduction measures instead, with ERP amongst them. If ERP is gradually applied in England, beginning with the areas of highest congestion and air pollution, including non-exhaust emissions pollution, then it can supply more resources to buses which can be made free, and make some contribution to increasing rail travel.[[2]](#footnote-2) This would mean more use of existing road infrastructure for bus lanes, and rising pressure to re-open disused rail lines. It is also probable that ERP could contribute funds for much increased Active Travel investment to complete walking and cycling networks throughout the country. We created a short report on Electronic Road Pricing for the Oxford City Region, which can be seen under REPORTS at [www.catg.org.uk](http://www.catg.org.uk)

Underground train lines: The volume of traffic in some locations, and the problems it creates in rush hour-school run times particularly, should mean that new underground train lines, to link up with existing surface rail lines, must be considered.[[3]](#footnote-3) Why this is not mentioned in the consultation document escapes us.

Cargo and ecargo bikes as a strategic element in infrastructure adaptation: Moving goods into cities and towns in large HGVs is physically damaging to roads and polluting as diesel is still in use. It is a strategic, not local, infrastructure issue which needed consideration in this consultation, but is not mentioned. The physical infrastructure needs of cargo/ecargo bikes are a critical national network issue. We note the rise of cargo and ecargo bikes[[4]](#footnote-4), including as a contribution to reducing HGV/delivery vehicle entry into Oxford. Adaptation of lay-bys for goods transfers, with toilets added to support drivers and cyclists, seems to us a strategic matter to encourage use of improved cycle routes to serve needs throughout the country. Some motorway service stations could be adapted to meet this need as well, in some locations.

Low traffic towns and cities: If the strategic goal of making existing communities into low traffic towns and cities, as in increasing numbers of communities in Europe, is rightly emphasised, then grand schemes for new trunk roads can be readily abandoned and work on road repair to a higher level of quality, and pavement repair, can be funded. Low traffic goals are not mentioned in the consultation document, although they are a clear alternative to immensely expensive trunk road building. With the DfT suggesting about 17% of car journeys are under 2 miles and over 70% under 5 miles, it is difficult to see why additional road capacity is desirable in terms of public health and in terms of cutting congestion. Walking, cycling and public transport make more sense as targets for investment.

Pavement parking: The Government has investigated pavement parking, but taken no action. It exists in London and before long in Scotland. Pavement parking should be banned in England, as a strategic step to reduce traffic and reduce need for infrastructure repair. This should have been considered as a strategic issue as it will tend to reduce some types of vehicle journeys, with implications for networks.

The ‘Powering Up Britain’/Energy Security Day casts a long shadow over this consultation: **The energy security proposals offered by the Government on Thursday 30th March undermine rational policy-making, and existing legislation, with regard to Climate, ecology, pollution, international obligations, and inter-generational responsibilities.** In short, we cannot see the deep cuts in GHGs in the Government’s documentation required to meet Net Zero.[[5]](#footnote-5) In effect, a new and very polluting range of policies is being forwarded to sustain Fossil Fuel use and appears to contradict not only UK legislation but also Treaty obligations. In general, the Government’s proposals will tend to create avoidable use of national networks of all kinds actually mentioned in the main consultation document.

Housing location in relation to traffic generation via new road infrastructure is not considered: If we take the view that the existing built environment is the major source of additional very low-cost housing, then: we can use CPOs to remove private rented properties in poor conditions from landlords; we can use empty offices/industrial buildings for housing; we can ensure that the blight of surface car parking is recognised as a brownfield land reserve for building homes above or around such sites; we can help achieve low traffic towns and cities by ensuring additional homes within urban settlement have covenants or other conditions meaning no vehicle parking is to be added into the area for them. In addition, this allows us to have a review of the peripheral and rural location of new housing developments which are satellite communities of employment centres, running a very high risk of increasing traffic through inept planning.

Mobility is a higher value than community: Mobility as a value is not questioned throughout the consultation document. It should be.[[6]](#footnote-6) If we consider high levels of car use for short journeys and long ones, when public transport is available and home deliveries of goods are possible, then one might conclude there is a degree of addiction in some people’s car use which the Government is intent on facilitating.[[7]](#footnote-7) Consider the alternatives to excessive mobility by cars: remote working has grown considerably, remaining a feature of work post-lockdown, both 100% remote and partial. Pressure for remote working, for flexitime and for a 4-day week, should lead to legislation to make them available as rights. Mobility is clearly a lot less important than car manufacturers might think, and the absence of increasing numbers of young people learning to drive is welcome, and may be encouraged in the pursuit of a healthier society.[[8]](#footnote-8)

Cycling and walking networks between communities as a strategic need: It is clear that public health would benefit by the completion of adequate walking and cycling networks between communities. Rural roads are often not good enough for walkers or cyclists, when improving public health is important in a country afflicted with obesity, inactivity and too much driving for short distances. It is also important that those with sedentary jobs, such as HGV and delivery van drivers, do get better access wherever they live to walking and cycling networks. This vital pair of needs are not considered in the consultation document. It follows from this omission that trained cycling and walking engineers are a strategic need for each County Council and Unitary in England. It is easier to promote active travel if the infrastructure for it is good.[[9]](#footnote-9)

**Assumptions:**

The Environment: The consultation document is written as if absolute environmental protection is not a consideration. As the UK is one of the most nature-depleted countries in the world,[[10]](#footnote-10) the idea that absolute protection for the environment for all time is not considered as a constraint upon infrastructure development is wholly inappropriate. We have only about 13% forest cover, which is one of the worst levels in Europe. We need rewilding as a significant step towards areas of far greater biodiversity in the UK.[[11]](#footnote-11)

Vehicle growth can be accommodated: The DfT offers a variety of scenarios about traffic growth, from 17-56% over the next few decades. Expanding trunk roads does not expand roads inside towns and cities, which would become even more congested if traffic expansion continues. The correcting assumption is that traffic growth must brought to a halt, using a variety of measures to make other alternatives more attractive.

Freight by air is not a national network issue: Clearly, freight imports by air have transport implications wherever aircraft carrying freight touch down in the UK. We would like to see pressure on the road system relieved by reductions in air freight movements as part of cutting greenhouse gas emissions. ERP charges can make importing less attractive, by adding to road distribution costs.

Commuting will grow and justify more national network capacity to accommodate it: At present, about 67% of people working in England commute to work by car, van or minibus.[[12]](#footnote-12) This impacts their quality of life and it should be a general Government imperative that commuting is reduced whenever and wherever possible as a social and environmental priority.

**Main consultation document:**

1.3 We reject this document as an adequate basis for nationally significant infrastructure projects, and urge that it is recalled and replaced. This should include strenuous efforts to reduce the need for avoidable trunk road construction especially; stop aviation and shipping expansion on Climate and air pollution grounds and curtail from now onwards. This has positive traffic and network implications near such locations. This would allow the relevant industries to develop actually sustainable alternatives, and have positive benefits in helping to encourage UK tourism growth and selected growth of industries where we import far too much e.g. food and wood/wood products.[[13]](#footnote-13)

1.5 It is inherently weak to separate the Strategic Road Network out as if other networks – road and rail – were not part of an overall strategic system. It makes for poor policy making e.g. having more trunk roads and failing to recognise the impact of more induced-traffic movements[[14]](#footnote-14) upon towns and cities is unhelpfully selective as a planning approach. Prevention of some vehicle movements and protection of communities from traffic are economically more sensible than adding to infrastructure which the current UK Government and tax base do not actually maintain properly.

1.11 In the course of reading many consultation and UK Government documents, we have not seen anything which could possibly allow the application of the term ‘sustainable growth’ to trunk road building, aviation or shipping expansion. It simply makes no sense at all. In terms of the current Climate and ecological emergencies, these expansions can be considered criminal.[[15]](#footnote-15)

1.20 the Appraisal of Sustainability offers no evidence basis of significance to allow loose talk about ‘uncertain effects’ of greenhouse gas emissions or ‘air quality emissions’, whatever they may be. We refer those responsible to the online output of the Committee on Climate Change since its inception, and to AR1-6 of the recent IPCC publications. Setting aside such immense sources of consensual evidence in favour of casual ‘uncertainty games’ is anti-intellectual. The UN report on 1.5 degrees C should have been a cognitive frame throughout the main consultation document.[[16]](#footnote-16)

1.24 Given the exceptional loss of species, habits and forests in the UK to bad planning and sprawling development, there cannot be a ‘Imperative Reasons of Overriding Public Interest’ for avoidable national networks.[[17]](#footnote-17) Given traffic growth recently and projected, we do – for example – need to allocate more space to walking, cycling and bus lanes on existing roads to achieve road traffic reduction.[[18]](#footnote-18)

1.25 Habitat Regulation Assessment, given the loss of habitats and species in the UK, needs to be reinforced as part of spreading the areas of biodiversity, wildlife corridors, rewilding and selective reforestation. We need an empowered and resourced Environment Agency with capacity to block developments in national infrastructure whenever necessary. But, in the 10 years up to August 2022, its resources had been cut by half.[[19]](#footnote-19) This undermines national network assessment and environmental protection. In practice, the Environment has never had the resources or powers it needs, as far as we can judge.

2.1 Journey times between places require less traffic on the roads, re-opening disused rail lines and free buses. A pavement parking ban in England, reductions in urban settlement car parking,[[20]](#footnote-20) ERP, remote working and flexitime promotion and rights and a 4-day week can all contribute to preventing new national network additions.

2.2 Given the impact upon the UK of long-standing import dependencies which have worsened in effects with Brexit and war in Ukraine, a Green New Deal industrial strategy should be developed to reduce imports and increase UK economic resilience. Freight movement into the UK by sea need not increase, reducing need for port re-developments other than Climate adaptation necessities. Local production for local and regional use should be a basic objective for the immediate future and the long-term. Given the expansion of delivery vehicles and of freight movements, rather than surrendering to this as a justification for additions to national networks, a re-examination of how freight movements might be diminished needs to take place, with potentially positive benefits for businesses if the resulting overall freight system is costing them less through more efficient use.

2.4 We reiterate that cargo and ecargo bikes and infrastructure for them (see above) need to be used to counter HGV movements in towns and cities.[[21]](#footnote-21) Whilst we recognise constraints upon rail and canal use, and the diminution of spaces once used to assist freight movements by these transport modes, we would like to see considered and selective use of both modes to assist in reducing road movement of freight.

2.6 Is out of date. The Government has cut Active Travel spending in England by £200m, from a budget not equal to the challenge of health promotion through investing in Active Travel.[[22]](#footnote-22) The scale of investment needed has been suggested by a National Infrastructure Commission report, noting how much of Active Travel investment is needed for junction changes to accommodate more cyclists, more safely.[[23]](#footnote-23)

2.15 Clearly, rail was never intended at any point to provide ‘a full end to end journey for the goods concerned.’ However, like canal freight, bulk materials may be moved to some sites for further processing. There is also a question of whether rail freight might become more diverse in carrying smaller items to link with improved cargo/ecargo bike infrastructure to keep more HGVs/delivery vehicles out of towns and cities.[[24]](#footnote-24)

2.18-2.21 Transport is the largest sector for UK-caused greenhouse gas emissions, including from surface transport, aviation and shipping. This is not considered sufficiently by Government, and certainly not in ‘Powering up Britain’ or related documents about transport, bearing in mind the deteriorating conditions in the Climate Emergency which feature in academic articles appearing month after month. The Committee on Climate Change has repeatedly warned the Government it needs far more detailed planning to cut all these emissions, which has implications for the Government’s Transport Decarbonisation Plan.[[25]](#footnote-25) Any additional national network space which caused yet more emissions from the UK transport sector would flagrantly ignore the imperative of actually cutting UK GHG emissions, and air pollution, from transport. The failure to frame discussion of national networks under the discipline of this consideration undermines the consultation document.

2.22 The implications of the enlarged SUV fleet for road space, emissions, vehicle parking, parking on pavements and space for cyclists are not considered as part of the overall transport problem in this section. This is odd, since the nature of these vehicles and the weight of them clearly has impacts on national infrastructure. We need less ICE SUVs through a scrappage system and an earlier date for phasing out their production. But EV SUVs will not be better in many respects, making the use of ERP to ensure they are costly to use very important.[[26]](#footnote-26)

2.26 We strongly support full electrification of the Rail system, and its renationalisation with a 50% cut in rail fares. This is aimed at cutting traffic movements, and overall transport emissions in consequence, making better use of the rail networks to do so, and prompting re-opening of disused rail lines and stations with increases in passengers over time.

2.28 We commend the rail contribution to reducing road freight movement and want policies to encourage a larger contribution in the long-term.

2.34 Non-exhaust emissions will not disappear with the arrival of EVs. The total number of vehicles, if allowed to increase, is likely to increase such emissions. Apart from road traffic reduction measures, a strategic response would be to support pedestrianisation and Active Travel in areas with highest levels of air pollution.[[27]](#footnote-27)

3.2 Population growth and economic growth are emphatically not ‘..the most critical influences on travel demand.’ The critical influences are the lack of specific policies to radically reduce certain types of travel demand. We assert these should include: ERP; free buses; a renationalised rail system with 50% fares cuts, frozen for a few years to assist passenger growth; ending generation of journeys to airports through abolishing private jet use and substantially increasing Air Passenger Duty.[[28]](#footnote-28)

3.3 Criticism of the idea of induced traffic demand is very vague at this point. Academic transport literature we have seen indicates repeatedly that more roads means more and longer journeys.[[29]](#footnote-29) The Government has also failed to protect urban settlements from excessive car journeys through the high costs of commuting by public transport, and excessive numbers of car parking spaces. We suggest a general application of Workplace Parking Levies could help to reduce car parking, as could abolition of town or City Centre car parks which generate traffic movements exactly where least wanted or needed, adding to pollution.

3.10-11 Reaching 40 degrees C in the UK in summer 2022, when earlier predictions suggested such a temperature need not be expected until c.2100, is a wake-up call about the vulnerability of long-term infrastructure in the Climate Emergency. It follows new infrastructure is not generally desirable: reinforcing existing infrastructure to take into account extreme heat, extreme rainfall and physical damage to the environment all must take precedence over new strategic transport networks likely to cause substantial additions to GHG emissions. But ‘soft infrastructure’ responses to rising sea levels may be prudent responses to the threat of national network infrastructure damage.[[30]](#footnote-30)

3.17 If a ‘Nationally Significant Infrastructure Project must ‘..seek to improve and enhance the environment…’ then vanishingly few new transport network additions could even be contemplated. No new trunk roads; no HS2.

3.25 Increases in traffic are a national disaster signalling neglect of public transport and active travel. Existing villages, towns and cities cannot accommodate further careless traffic increases: a wide range of measures should be used, as we have outlined above, to stop traffic expansion and then systematically reduce it so that existing junctions and routes operate with no need for additions to capacity.

3.36-7 Improvements in the prospects for roads and drainage require radical cuts in all UK-cause GHG emissions, and substantial additions to Overseas Aid for developing countries to enhance effective programmes for mitigation and adaptation.

3.42 Claims of Government policy to encourage active travel and bus use do not explain low levels of walking, cycling and a 10-year decline in bus use. The resources committed are not sufficient to the tasks, and this is part of not taking the Climate Emergency seriously, currently entrenched in UK Government and many local councils.

3.44 We do not need more capacity in networks; we need to decrease pressures for more use of existing networks.

3.50 This includes the following statement: ‘The Department will continue to monitor demand, and it is important to note that expansion to the network tends to increase overall demand.’ This contradicts somewhat feeble querying of induced traffic demand in 3.3 (see above).

3.70 The Environment Agency has been cut by over 75% since 2010. How then can we judge that the Environment Act 2021 has ‘..introduced more stringent environmental protection..’ when enforcement has been compromised by mindless cuts? The immense outpouring of sewage without effective sanction by any statutory body, the continuing loss of species and the burial of land under concrete and tarmac are not evidence of stringency or enforcement. Consequently, new infrastructure cannot be expected to reflect a regulatory regime that does not actually exist. The context has to be changed: renationalisation of water to address leaks and stop sewage dumping is of benefit in many respects, including rectifying the damage to national network infrastructure by water industry failings, and prevalent low-quality repair policies for roads and other infrastructure.

3.78 New rail lines are not a priority. In terms of resources and environmental impacts, re-opening disused lines makes far more sense and generalises the benefits of increasing public transport access as part of reducing traffic growth and its consequent air pollution/GHGs impacts.[[31]](#footnote-31)

3.90-91 Adding freight interchange structures to the rail system on any greenfield site will result in massive and appropriate local opposition, due particularly to traffic impacts in the vicinity. The onus on those involved is to maximise cargo and ecargo bike use. We suggest that car parks next to rail lines be considered for this type of facility, in principle; similarly, a contracting system of airports due to recognition of the Climate Emergency may provide brownfield sites next to rail lines appropriate for freight interchange, and for new schools and hospitals. In general, we think aviation for short haul and private jets[[32]](#footnote-32) should not be permitted, and that airports offer opportunities for a combination of types of development including housing and employment with a strong emphasis on high density of both, rather than sprawl. In relation to national networks, the presumption that they may be needed assumes utter failure in creating more locally-based employment, less commuting and more communities where facilities are within walking and cycling distance. It also relies on assumptions about traffic movements near airports and ports that may be diminished under Climate-responsive policies.

4.20 ‘Biodiversity Net Gain’ seems to presuppose a necessity for biodiversity loss in existing sites of ecological value due to badly sited development? The justification for national network development which adds to losses of habitats and complex ecologies in a nature-depleted country is not visible to us. Public preference, the desirability of ‘stay-cations’, environmental enhancement favouring tourism and supporting parts of the syllabus for school students are a few reasons why both Climate and ecological emergencies justify an end to new national network development wrecking environments. This simply should not occur; we have indicated alternatives. We also favour rewilding over ‘biodiversity net gain’ and the delivery of increased areas of biodiversity by linking up the ecological fragments left by the decades of bad planning and thoughtless land use.

4.24 Quality of life in a community is not served by its primary function being a dormitory. The more people able to do remote work, have flexitime, have four-day weeks, then the more life and activity is present in communities throughout the week and local businesses and facilities of various types will benefit. Productivity enhancement seems to follow from less work on site.[[33]](#footnote-33) New National networks for commuting particularly should be questioned in principle.

4.30-41 Climate Change Adaptation is an area of general policy failure in the UK. We commend the latest Committee on Climate Change report which lambasts the comprehensive failings of the Government in this key area of policy.[[34]](#footnote-34) Adaptation is being under-funded and the Government’s ‘Powering Up Britain’ package of documents includes much that expands support for fossil fuel corporations as if human-induced Climate Change did not exist. Indirect subsidies to fossil fuels include encouraging hydrogen use, whilst under-funding and thereby constraining the roll out of heat pumps to replace domestic gas. And there is no sign of ending the £10-12 billion a year in UK fossil fuel subsidies. Transport clearly requires very deep cuts in GHG emissions and adaptation of existing infrastructure as the Climate Emergency continues, without abatement. We have already indicated that new National Network Infrastructure cannot be implemented when the costs of adapting existing infrastructure need calculation, planning for decades ahead, and rigorous EIAs and SEAs to ensure Climate and ecological emergencies are not worsened in this overall process. We have examined Adaptation to Climate Change in the Oxford context, with reference to transport and green space.[[35]](#footnote-35) But we note Oxford City Council has no Adaptation policy framework nor does it have one for peatlands in the City and crossing its boundaries. Adaptation to Climate Change means setting priorities for all statutory bodies and private sector organisations as if the future mattered, and that means must include adapting existing infrastructure and ensuring expansion of national networks of the types mentioned in this consultation does not occur.

4.42-50 We cannot seriously believe that we have pollution control and environmental regulatory regimes with extraordinary quantities of sewage entering our watercourses year on year. Permissible pollution is a wholly inadequate response to pollution of air, land and water. In terms of National Networks, we need a renationalised water industry with a duty to repair leaks and eliminate sewage from water courses. This is clearly far more important as a national network and environmental priority than the topics in this consultation document. Clearly, existing transport networks vulnerable to flooding, landslips, water incursion undermining them and damage from heat or water need prioritising over new sections of such networks.

4.55 Safety for the public as road users including as pedestrians and cyclists needs a ‘Vision Zero’ approach.[[36]](#footnote-36) We want 20mph set as an enforced speed limit within towns and cities in England. If this discourages some car journeys, then this is positive in terms of reducing physical impacts on roads, and helping to decrease traffic including on existing Strategic and Major road networks. For dual carriageways of all types, average speed camera observation with ANPR should allow a reduction in maximum speed to 50 mph. Again, we think this may discourage those prone to break existing speed limits from making such journeys.

4.65 National security for national networks needs careful assessment since the existence of national networks contributing to GHGs is an active security issue threatening the future of the UK. Air pollution, from ICE vehicles and EVs, including non-exhaust emissions, kill at least 40,000 people in the UK annually. This is a security issue killing people every year. In terms of national networks, the consultation document does not consider coastal or estuary protection either. In consequence, both EIA and SEA standards for assessing improvements to existing networks and judicious creation of networks of protection against sea level rise and storm surge incursions need to be recognised as both ecological and national security measures, and to be funded accordingly. We cannot expect to protect coastlines and estuaries and existing national and local infrastructure unless this is adequately funded.

4.72 Accessibility requires a commitment to national networks for walking and cycling both within existing settlements and between them. This is a health promotion priority and one likely to contribute to public health and therefore less need to have recourse to the NHS. Traffic reduction, as we have emphasised, has many benefits and we should note here that reductions in road space and car parking, especially within settlements, is part of allocating such space to walking and cycling, pedestrianisation, fountains for assisting in resistance to the ‘urban heat island’ effect etc.

5.7-10 Air quality in the UK requires more pedestrianised areas and walking and cycling network improvements. We do not have technical solutions to emissions from aviation and shipping that can be scaled up for Net Zero by 2050.[[37]](#footnote-37) We do not have technical solutions in view for stopping all forms of toxic non-exhaust emissions from vehicles including tyre and road abrasion particulates, the products of brake pad erosion and the added effect that cars move toxic road dust about. If we are serious about Net Zero, then whatever national networks might be envisaged, none of them can be additions which add to GHGs or air pollution. Also, cleaning up existing networks requires a different approach to renewal and maintenance: full electrification to cut rail emissions; bringing forward dates to stop use of some types of polluting vehicles e.g. SUVs or using much higher rates of VAT to discourage purchase; a general scrappage scheme to encourage users of highly polluting vehicles to put them into the recycling/re-use chain and have credit either for public transport use, or for an ebike or for a replacement EV. We believe this will may have positive implications for the life of road surfaces, for example, however: we should note equivalent EVs to ICE vehicles are heavier.

5.21 Any increase in air pollutants is a reason to block development. Suggesting otherwise is to be willing to compromise public health.

5.24 Rewilding around existing transport infrastructure, especially heavily used roads, can contribute to reducing pollution and noise impacts, and extending habitats.

5.25 The Government’s policies on Climate are contradictory: supporting oil and gas expansion, building new roads to add to traffic, allowing use of fossil fuels to produce hydrogen and failing to cut all forms of transport emissions are all examples of how Net Zero is unlikely to be achieved. The many comments on the Government’s Powering Up Britain package and its associated documents indicate experts do not trust the Government’s assertions in Climate Emergency-related policies. Government adds to the distrust of politicians by making claims which experts, organisations and campaigns find improbable. So: we cannot trust new National Networks will somehow magically not undermine the pursuit of Net Zero.

5.43 Mitigation as a strategic consideration needs to deliver month on month reductions in GHGs to compensate for the 60% plus increase in UK carbon emissions since the early 1990s. Pollution must be prevented at source, meaning new polluting installations or developments cannot be permitted. Consequently, we need action to reduce the impacts of existing national networks rather than additions to capacity of those networks favoured in this consultation document.

5.50 The Government’s 25-year environment plan is to be undermined by its EU Revocation Bill. The Government has sidelined the Polluter Pays Principle and the Precautionary Principle, meaning it is not to be taken seriously in its environmental claims. It has done nothing to prevent local planning committees from indulging in many types of environmental damage in the name of development. Government policy in the Climate and ecological emergencies needs radical revision, with implications for existing national networks and their use.

5.56 No SSSIs should be sacrificed to development. On the contrary, restoration of nature should – wherever practically possible – lead to increases in the area of SSSIs.

5.57-5.58 As illustrated by the great chainsaw massacre already done in the name of HS2, protection of all types of trees in England is very poor indeed. To protect trees from development and random cutting, we need a Universal Tree Preservation Law making the removal of trees above 10 feet in height unlawful without planning permission and extremely restrictive conditions e.g. no trees may be removed for building extensions or car parking extensions. Since new national network extensions may be particularly damaging, it increases the case against them that tree removal is done so often and so casually.[[38]](#footnote-38)

5.64 It is not possible, given the harm to nature by development in the UK since 1945, for the benefit of any development to outweigh the benefit of retaining the natural environment/habitats/land suitable for a variety of agricultural uses. In short, additions suggested to national networks in this documentation are illegitimate. The potential of a consistent greening of policies for quality of life, employment and meeting societal needs is not generally recognised by the largest political parties, corporations or statutory bodies.

5.75 Aviation, like shipping, has to be curtailed dramatically to force technological change upon unwilling industries that have been avoiding it since human induced Climate Change identified them as growing sources of emissions. Moving beyond the limitations of UK 2050 goals, we need carbon negative targets and the transport sector is particularly appropriate for revolutionary steps to cut emissions and assist in the process of change from now into the rest of the century. We recognise that over-dependence on flying and on some types of shipping of goods which could be produced here, or not produced at all, are ‘soft targets’ for actual cuts in GHG emissions serving both Net Zero and long-term carbon negative roles. So: expansion of aviation and shipping, with further negative impacts upon existing national networks especially major/strategic road networks, can and should be avoided. Post-2050, then electric aviation and shipping (perhaps with more use of sail as already being trialled) may be scaled up over a period of decades. However, we do not see this as justifying the maintaining of short-haul flights or current levels of imports where the UK could meet its own needs. Both of these have surface transport implications and we need to reduce traffic levels rather than add to congestion, air pollution, noise and reduced quality of life.

5.95-99 Coastal development, especially nuclear power stations, is highly imprudent. Government action to continue with the latter is a part of not taking Climate Change seriously. We do need coastal and estuary protection of road and rail to maintain networks where possible, but even a single metre of sea level rise by 2100 would mean: encroachment on rail lines between Whitstable and Herne Bay, and between Folkestone and Dover – as examples. If, as seems possible, the general failure to dismantle ‘business as usual’ emissions continues, then sea level rise could be above one metre. Comprehensive decisions about how coastlines and estuaries may be realistically protected have yet to be made, with only incremental ones appearing for implementation. This is despite being features of the adaptation to Climate Change which has already been created by the failure to cut global emissions. Very difficult decisions need to be discussed, including with those communities which are very hard to protect. What applies to communities can also apply to physical infrastructure of national networks which sustain them.

5.120 This under-states the risk of extreme weather events, particularly rainfall. Also, the 40 degrees C record breaking temperatures in summer 2022 should have led to radical reassessment of UK Adaptation and Mitigation policies, which has yet to take place. Given the very poor work of Government since 2010, and the lacklustre efforts of previous Governments 1997-2010, there is a lot of catching-up to do. We judge that further capacity in national networks as suggested in this consultation document is not a priority for coming decades.

5.124 Flood risk assessment influencing decisions about National Networks should be made with a forward 150-year realistic future scenario - assuming that ‘business as usual’ remains in place globally. This would mean strategic judgements about how and whether existing national networks could be protected or repaired becoming realistic for the first time.

5.133 We have a general concern that Sustainable Drainage Systems are not being maintained and suggesting that they are actually sustainable is greenwash. National Networks existing and new may well require revised versions of the sort of drainage generally provided. Both SUDs and drainage elsewhere needs much higher standards, including for volume of water it may deal with and maintenance schedules. A local example from Oxford can illustrate the difficulties in obtaining higher standards.[[39]](#footnote-39) The habitual cutting of local government has undermined many essential functions, and will need to be revisited if local government is to play an effective role in drainage quality, maintenance and sustainability in future. If this is not done, national networks may be far less sustainable than imagined.

5.146 Both roads and rail lines may be more susceptible to landslips/landslide in future due to the global failure to cut greenhouse gas emissions. Extreme rainfall is to be expected, has already occurred in the UK, and will almost certainly create more need to protect road and rail lines. This will be costly, and should put an end to the ideas of National Network capacity increase suggested or implied in this consultation.

5.164 With regard to any roads, we think road-widening should not occur. Accommodating more vehicles is contrary to the public interest. It will create more GHGs, pollution, noise, accidents and push up spending on roads that need not occur. Active Travel investment is an essential public health need; discouraging the sedentary activity of driving is a health imperative too. Road narrowing to allocate space to cyclists or to bus lanes is a Climate Emergency policy that can be made throughout England on many roads.

5.171 Green space requires absolute protection from national networks and indeed from development. We can and should make more intensive use of the following: car parks, including with homes above and around them; low density employment areas such as industrial estates and science parks where too many buildings are single storey; and some industrial sites should be transferred to other uses such as schools and hospitals, where the possibility of movement to proximate employment sites exists.

5.175 As far as we can judge, planning committees in England have not got the memo about protecting trees/woodlands/forests. National Network construction, e.g. HS2, certainly has not been conducted as if the environment matters. The public cannot realistically trust Government to deliver new national network capacity without continuing the trail of destruction, cost over-runs and ignoring public objections that characterises this type of activity.

5.179 Reasons for building on green belts, and flood plains, appear so prevalent that the terms are largely meaningless designations. We reiterate that green belts and flood plains in a country which is nature-deprived and has poor Adaptation planning both need absolute protection. A national network being built through either at surface level or via bridge is unacceptable. Tunnelling might be possible, but is expensive, and is best reserved for underground train line creation or extensions.

5.187 Forest/woodland loss is to cease. There is no justification for continuing the massive losses occurring since 1945 particularly. We need a very long period of rewilding and nature restoration. The employment potential of this process for public and private sectors would be considerable.

5.192 The idea that existing open space in England is surplus to requirements is a curious judgement bearing in mind population increase, and the problem of public obesity suggesting far more exercise is needed. So, this is a strategic mistake and there should be a general block on such action. On the contrary, better funded local government should improve facilities and foster more use of such sites.

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