



CONSULTATION ON LOCAL TRANSPORT PLAN 3 GUIDANCE

Response from Friends of the Earth England, Wales & Northern Ireland

We welcome this opportunity to respond to the consultation on the Draft Guidance to local authorities on LTP3.

Friends of the Earth inspires solutions to environmental problems, which make life better for people. Friends of the Earth is:

- the UK's most influential national environmental campaigning organisation
- the most extensive environmental network in the world, with around 1 million supporters across five continents, and more than 70 national organisations worldwide
- a unique network of campaigning local groups, working in more than 200 communities throughout England, Wales and Northern Ireland
- dependent on individuals for over 90 per cent of its income.

This consultation response focuses on the need for the Department for Transport to lead significant cuts in carbon emissions from local authorities through and beyond the next round of local transport plans. Our approach is that the scale of this challenge requires a primary focus upon changing behaviour and cutting car use. Technological improvements are clearly important but will only ever be part of the solution.

Our consultation response is in two parts. Firstly we set out general comments upon the guidance as it currently stands. We welcome much within the guidance, which is a clear evolution of the rather unwieldy LTP2 documentation – but we fear it lacks ambition and the courage of its convictions. The clear legal and scientific need to substantially cut transport's carbon emissions at the local level is certainly recognised in the guidance, but this doesn't translate into enough of an imperative for local authorities.

Secondly we respond to the Department's specific questions as set out at the start of the document.

Our general comments on the guidance

Our chief concern with the guidance as it stands is that we do not believe it will lead to the necessary cuts in carbon from local transport – cuts that are urgently required.

There is an imperative for urgent action on climate change, within which transport at all tiers must of course play a proportionate role. These are cuts that must start immediately; as recommended by the independent Tyndall Centre for Climate Change Research at the University of Manchester¹, UK emissions need to be cut by 42% by 2020, whether or not there is international agreement, and these cuts should be made in the UK, rather than allowing offsetting or trading to account for a substantial part of the target.

This is not just a scientific imperative. It is also a legal one as a result of the Climate Change Act 2008 and its target to cut emissions by 80% by 2050, with carbon budgets that contract every five years. It is not an easy business to ascertain what proportion of the overall carbon emissions reduction should come from transport – but it is inarguable that big reductions will be needed. Short-term action is vital, and the right decisions will also need to be taken to plan for the future.

It is welcome that tackling climate change is one of the DFT's five stated "challenges" for its future transport strategy. Yet as we noted in our response of February 2009 to the Department's Delivering a Sustainable Transport Strategy consultationⁱⁱ,

"of the challenges, acting on climate change stands alone as the one upon which action is essential. It is demanded by the latest scientific evidence which underlines the depth and urgency with which cuts in greenhouse gases must happen".

As these five draft challenges are mapped across to the LTP guidance we believe it is important to strongly restate this point in this current response. Cutting carbon from transport plans at any tier can not be viewed as an optional extra and should be regarded as the priority aim. Indeed, there is no reason why it should be. As we also noted in our DaSTS response:

"Significantly, in the current economic climate, moving towards low carbon transport will not just cut climate change emissions, but can also be an important part of the UK's route out of recession through creating jobs and establishing new low carbon industries. Not only do we believe that there should not be a trade-off between climate change and other challenges, we also believe that there need not be. Efficient, accessible and reliable low-carbon transport systems boost productivity and economic development, as well as inspiring healthy travel and improving air quality".

Taking action to cut carbon from this round of LTP planning is the responsible and necessary long-term approach. The right decisions must be made now

about long-term infrastructural investment or planning strategies so that low-carbon local transport patterns will be ‘locked-in’ in the years to come, when carbon budgets contract. Research including Tyndall (see above) concludes that emissions must begin to contract no later than 2016 – a date that is only five years from the commencement of LTP3s.

All of this means that, although the draft LTP guidance certainly “*encourages... significant steps towards mitigating climate change*” (3.4.10) from local transport, the proposed hands-off approach from DFT is deeply inappropriate and will not deliver anywhere near the required carbon reductions. **We strongly believe that DFT has a responsibility to restore its leadership role on this critical issue.**

There is of course a broader issue here with the new “*changing nature of the relationship between central and local Government*” (guidance notes). DFT does not propose to formally assess LTPs and instead wishes to see plans that deliver on local priorities and in which authorities are “*accountable to their communities*” (3.10.34). Experience tells us that without a central compulsion upon authorities to lead big carbon reductions, they simply will not happen. For example within Local Area Agreements, one-third of authorities have not chosen to adopt National Indicator 186 on cutting carbon across the authorityⁱⁱⁱ. We recognise that this “new relationship” originates from elsewhere in Government. Yet it is also the case that meeting the imperative of climate change needs low-carbon now, across the board, and that requires strong leadership.

Notwithstanding the desire for and trend toward more devolved decision making there remains a strong Central Government steer to and requirement on local government to meet central objectives which the Government regards as being of the highest importance. We note from the Government’s Sub-National Review and the resulting Local Democracy Economic Development and Construction Bill that while giving local and regional decision makers more freedom to set priorities, the Government is still requiring local and regional delivery on centrally derived targets for economic (GVA) growth and housing growth.

On this basis, and given the imperative of climate change – which we would not expect the Government to say is any less important than these two centrally dictated objectives – there seems little to prevent the Government firming up its requirements for action at all levels on climate change.

We believe that DFT must step back into a role of formal assessment of LTPs – certainly, if only, when it comes to carbon appraisal. DFT must reject LTPs or schemes therein which would increase carbon emissions. It is perfectly coherent within the terms of the “*new relationship*” to ensure that plans which meet local priorities also meet the Government’s responsibility to lead carbon reductions across the economy, and the DFT’s to cut carbon from transport. The evidence of the recent RFA2 preparation round, where the quality of carbon assessment varied hugely from region to region^{iv}, shows the desperate need for clear central oversight and coordination of the process.

Regarding the existing proposed text, as an absolute minimum, the Department should toughen up its language to underline the vital need for action on climate change, and should more broadly refocus its five national DaSTS “challenges” around carbon cuts. The guidance should clarify potential existing and new funding streams for carbon reduction to inspire their take up (see below). And the guidance should do much more to bring to life best practice on carbon reduction so that authorities can be inspired to deliver cost-effective schemes that cut carbon whilst also meeting social and economic needs (again, see below).

Specific DFT questions

Is it clear what is required of local authorities in producing an LTP, bearing in mind the changing nature of the relationship between central and local Government as discussed in the guidance?

We welcome the DFT’s encouragement of carbon reduction from local transport plans, although as we discuss above we do not believe the wording as it stands is sufficiently imperative to generate the kind of response from local authorities that is demanded by the science and by DfT’s responsibilities.

It is welcome that the guidance explicitly promotes the importance of LTPs that address **travel-to-work areas**, including the production of joint LTPs where appropriate. The Department will of course be aware that many of the boundaries to such cross-authority working are political, and should adopt an ambassadorial role to ‘sell’ the benefits of such an approach.

We further welcome the encouragement in 4.5.14 to produce long-term (10 or 20 years) strategy plans. This provides the opportunity to set long-term targets for carbon reduction and other areas and we believe the guidance should explicitly promote these. Yet we propose that the **timetables** of the implementation documents for LTP3 and beyond should clearly linked to the five-yearly carbon budgeting timetable. This seems entirely coherent, as the ‘availability’ of carbon across transport as a whole is going to be crucial for the viability of authority’s LTPs.

Although the guidance highlights the statutory duty upon local authorities to keep their LTPs under review, we believe that DFT must make it clear that it retains the ability **to trigger a mandatory review** of all LTPs in response to particular changes in the policy landscape. Carbon reduction is one such area. There are huge uncertainties at the present time about the future landscape for how carbon appraisal and budgets will affect the viability of transport plans: the Department’s strategy for carbon reduction is not yet published; the DaSTS process has only just begun; big changes to the regional architecture are imminent; and future changes of Government may lead to sweeping changes to all of the above and more. It is eminently sensible to make it clear in the guidance at this stage that there may be future changes to the regulatory or policy landscape that would entitle DFT to reserve the right to trigger a mandatory review of all LTPs.

The regional level of strategy and decision making is the place where decisions at the local level can be viewed in the round and from a strategic perspective to assess whether transport is playing its role in sustainable land

use, transport provision and, of course, carbon reduction. Although not explicitly mentioned in 3.6 (Alignment with regional strategies) key to the successful carbon reduction from provision of and decisions about local transport will be the evidence of transport's role in carbon reduction, sustainable land use and other key outcomes which is fed into the data sets and evidence bases used to inform and underpin the development of Regional Spatial Strategies and new Integrated Regional Strategies. The ongoing **monitoring and implementation** of the new Integrated Regional Strategies will also provide a way to track how well LTPs are aiding or holding back efforts at regional and local level from contributing to achievement of sustainable development.

In 3.8 (LTPs and LAAs) the DfT acknowledges the role of Comprehensive Area Assessment (CAA) as a "*robust and independent system*" (26) and states that the "*planning and delivery of transport will be an important area for consideration in CAA*" (36) for checking the performance and delivery of LAAs which include indicators and actions on transport and which should be expected to help deliver sustainable transport and carbon reduction. The guidance should, therefore, state the DfT's explicit expectation that local transport decisions should assist the **sustainable direction of each region** as measured by evidence bases, CAA and the implementation and monitoring of Integrated Regional Strategies.

Does the guidance strike the right note between brevity and giving support to authorities in developing plans?

The guidance is of an appropriate length and is easy to read; in that regard it marks an improvement on LTP2. We believe that it is broadly clear to a local authority what the DfT expects it to deliver. The section on generating options (4.7.C) is helpful and it is encouraging to see that there are many low-carbon initiatives suggested as examples.

We see two problems.

The first of these is *what* it is that DfT expects authorities to deliver, with which we disagree, as explored above.

The second is around the reality of local transport plan production in local authorities. We believe there are four key areas that militate against a local authority bringing in a low-carbon local transport plan:

- (1) **funding** – particularly for revenue but also for capital – of even more concern in the current financial climate;
- (2) **accessibility of best practice** – we believe it should not be underestimated that there is a gulf in practice between the best and worst local authorities and there is clearly work to do to make further examples of the very worst and best performing schemes that can cut carbon;

(3) **training and skills** to deliver schemes; and

(4) **will** – producing a first-class local transport plan which centres upon carbon reduction and the other four DFT challenges requires, in the absence of DFT compulsion, significant work by the Department to inspire.

On **funding**, we believe that the detail on funding sources provided (*“Authorities should consider alternative sources of funding for both capital and revenue initiatives. Options include... “*, 3.5.18) is insufficient, as is a singular mention of funding in the best practice document with reference to Developer Contributions. We believe this section should be expanded with a list, with summary information, about the most common sources of funding for both capital and revenue funding – and that the policy handbook link to a full DFT briefing with much more information about these funding streams.

The importance in the current economic climate of clear, simple and accessible help for authorities to take forward low-carbon initiatives is vital – particularly in the area of revenue funding, which can underpin much of the ‘quick wins’ that programmes such as Smarter Choices can deliver.

One particular additional proposal is that the Department create and administer a new **Carbon Reduction Fund** for transport, which would ensure that measures which cut emissions are prioritised and have access to finance. The CRF would reallocate half of the remaining money from the Transport Innovation Fund to support those schemes which would make a significant contribution to cutting carbon, and allow the development of a robust methodology for judging what works in carbon-cutting from transport. Local authority bids for funds under this scheme would have to be outlined within LTPs, and would be approved or rejected by DFT. It would need to be stressed that the CRF is not the only funding that could be used for carbon-reduction, but is specifically earmarked for taking forward pioneering initiatives. A briefing on the proposal for a Carbon Reduction Fund is available from Friends of the Earth.

More generally on funding – and leading on to the next area of concern – we believe the Department could consider creating an ongoing **best practice** reference on low-carbon transport for local authorities. Each example of best practice could:

- be presented in a common format, with a short summary of the project and the area in which it was applied;
- quantify carbon savings in the authority that it led to;
- quantify impacts upon the other DaSTS goals;
- crucially, discuss how the project was funded and how much it cost;
- outline how long it took to implement and what DFT or other Government department support was needed to make it a success;

- and outline any other links to the wider community that were of benefit in delivering the initiative, such as partnership working.

The purpose of the resource would be illustrative rather than attempting to necessarily outline hard and fast policies that can be transplanted directly from one authority to another for the same costs in the same timeline. It would act not only as a guide to the sorts of projects that can cut carbon whilst meeting other DaSTS goals, in the manner of the *Meeting Targets Through Transport* document, but also outlining how practical matters such as funding, timescale and implementation were dealt with. Furthermore, we strongly support putting such a resource online, as is already proposed for the policy handbook. This would enable the resource to be kept up to date with best practice as it emerges but also be searchable; if designed as a WIKI it could be updated by local authority practitioners or those in the wider transport community, which would greatly expand its potential as a resource. We would be pleased to discuss these proposals with the Department in more detail.

We welcome 4.7.28's assertion that an LTP should be based on "*the best evidence available*". This means that, with reference to 4.7.24, authorities will need to **baseline CO2 emissions** in their area if they are to understand the impact of their proposals on carbon emissions. DFT will need to provide clear appraisal guidance to ensure that this is done consistently. However, as noted in 4.7.31, it is insufficient for LTPs to merely "measure" greenhouse gas impacts, but instead should actively reduce them.

Does the approach to the Policy Handbook work, including having a web-based version that can be updated?

We believe that the approach to the Policy Handbook is a step in the right direction, and strongly support moving as much of this kind of resource online as is possible, without excluding the diminishing numbers without web access. It is vital that such resources are kept up to date and that the Department can actively seek additional links for inclusion at any time.

With the publication of the DFT's Carbon Reduction Strategy later this year we would expect guidance to be produced to actively aid transport practitioners in taking forward carbon reduction in their plans. As the 'climate change' section of the policy handbook stands at present it is very light on concrete examples of what local authorities can actually do and how this can help them meet their carbon reduction obligations. The production of a web-based best practice resource, as outlined above, could go some way to addressing this.

The key point is that guidance is only the start of the process that cumulates in excellent local transport plans. In the absence of a hands-on relationship with local authorities – which we challenge – we nonetheless believe DFT should resource work to skill, inspire and inform authorities as to the potential for carbon reduction through local transport.

Is the guidance clear and understandable to a non-transport audience?

Broadly yes – with the exception of understating the need for action on carbon reduction, as discussed elsewhere.

More information

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ⁱ A copy of the Tyndall research is available at
http://www.foe.co.uk/resource/reports/tyndall_climatereport_ccc2008.pdf

ⁱⁱ http://www.foe.co.uk/resource/consultation_responses/sustainable_transport_system_mar09.pdf

ⁱⁱⁱ <http://www.localpriorities.communities.gov.uk/>

^{iv} For example, as highlighted in a March 2009 briefing from the Campaign for Better Transport:
www.bettertransport.org.uk/system/files/09.03.26.regional-funding-briefing.pdf