

Response ID ANON-6H3N-2P1T-6

Submitted to **EEH Transport Strategy, Integrated Sustainability Appraisal and Statutory Status Consultation**

Submitted on **2020-10-06 18:27:21**

Draft Transport Strategy: Vision and principles

1 To what extent do you support or oppose our vision?

Oppose

2 To what extent do you support or oppose each of our principles?

Principles - Achieve net-zero carbon emissions from transport no later than 2050:

Support

Principles - Improve quality of life and wellbeing through an inclusive transport system accessible to all, which emphasises sustainable and active travel:

Support

Principles - Support the regional economy by connecting people and businesses to markets and opportunities:

Oppose

Principles - Ensure the Heartland works for the UK by enabling the efficient movement of people and goods through the region and to/from international gateways:

Oppose

3 Please provide any further comments you have about the vision and principles.

Comments:

There is a lot to commend in the vision and principles, notably the commitments to zero carbon "no later than" 2050 and to sustainable and active modes of travel.

However, zero carbon is the only headline measure of environmental sustainability mentioned, and there is little commitment to (or even recognition of) the need/desire, let alone the legal requirements where they apply, to the protection and enhancement of natural and cultural assets in the region. This is a fundamental flaw in EEH's thinking generally, and in the transport strategy in particular, that urgently needs consideration. This is not just from the perspective of the legal obligations on the public bodies that constitute EEH (and the moral obligations on their private-sector partners and stakeholders) to protect and enhance such assets, but also relates to the unarguable fact that those environmental and cultural assets (such as the Chilterns AONB) are very much a part of what makes the region so attractive as a place to do business, and as a place for the people doing business and their families to live in and enjoy. While that fact is recognised in the strategy (e.g. on p.18), the positive aspect of these environments are also countered with the dismissive assertion that the Chilterns "typifies some of the rural connectivity challenges that many parts of the Heartland face", thereby labelling the AONB as a problem, and yet not proposing a solution tailored to the area's specific circumstances. It's worth noting that, objectively speaking, the Chilterns AONB is not only one of the best connected protected landscapes in the country (certainly the only one that can be accessed by Tube from central London - it also boasts dozens of mainline railway stations), but it is also arguably better connected than almost any other rural part of the EEH region.

The protection and enhancement of assets such as the Chilterns AONB must be a key, integral commitment in the vision of the EEH and of this transport strategy, rather than an add-on (or, as is currently the case, not even that), and the objectives of connecting people and businesses and of ensuring and enabling the efficient movement of goods must themselves respond to that underlying commitment.

Note that the duty under section 85 of the Countryside and Rights of Way Act is for the "protection and enhancement" of AONBs not "and, where possible, enhancement" as commonly used in the strategy. This means that public bodies will have failed in their statutory duties if, in considering the impact of development on an AONB, a public body has not given due regard to both the protection and enhancement of the AONB and its setting. The strategy as currently worded provides no evidence that this duty of regard has been had, nor does it give any relevant context in this regard for future decision makers.

It is doubly disappointing that the transport strategy continues to downplay environmental and cultural assets such as the Chilterns AONB and commitments to its protection and enhancement given that one of the 12 key messages from the earlier consultation noted the need for specific policies for the region's AONBs.

We are also concerned that the transport strategy is being considered separately from any spatial strategy for housing and employment growth in the region, despite at least three decades of research indicating that planning for transport needs to be integrated with that for other uses of land. The concern is that the good intentions of this strategy, in terms of promoting sustainable and active modes of travel (along with the wider desire to generally reduce the need to travel, which is not so well represented here) will be stymied by an approach to land-use planning that continues to lock in car dependency, in terms of the forms of urban development most often delivered, along with an unwritten national spatial strategy that continues to pile economic growth into the already overcrowded London metropolitan area (e.g. with the standard method for assessing housing "need" and proposals to expand Heathrow) meaning that much of the new development that takes place in the EEH region will simply be an expanded commuter belt for the capital, much to the detriment of the natural beauty and tranquillity of the Chilterns AONB.

The Chilterns Conservation Board and the Chiltern Society have prepared a "proposed common approach" to transport planning in the Chilterns for which we have begun to seek support among the transport planning authorities in the Chilterns AONB area. The key objective of this approach is to facilitate joint strategic transport planning and management across the Chilterns. We will circulate a copy of that document separately: it may be considered as a statement of the

Board's aspirations for transport planning in the Chilterns, which could inform the EEH transport strategy and subsequent more detailed programmes, with the addition of EEH to the list of stakeholders given in the document.

Draft Transport Strategy: Step-change in approach

4 To what extent do you support or oppose investment in the following areas?

Investment - Digital infrastructure both fixed (e.g. broadband) and mobile (e.g. 4G/5G) to enable business growth, improve access for residents to services and opportunities, in ways that also reduce the need to travel (where appropriate):

Neither support or oppose

Investment - Our existing infrastructure assets to improve its resilience and connectivity, thereby improving business productivity and supporting our communities:

Neither support or oppose

Investment - Repurposing existing infrastructure and services, particularly within larger urban areas to actively encourage active travel modes and user-centred services, and reduce reliance on the private car:

Neither support or oppose

Investment - Greening travel routes to encourage walking or cycling and therefore improve both physical and mental health, whilst at the same time acting as green corridors for wildlife:

Neither support or oppose

Investment - New infrastructure capacity and capability to enable delivery of planned economic and housing growth:

Neither support or oppose

Investment - Improved connectivity for rural communities to enable small market towns to support their rural hinterlands:

Neither support or oppose

Draft Transport Strategy: Policies

5 To what extent do you support or oppose the policies set out in the following themes?

Policies - A Transport System for the Future - policies targeted towards decarbonising the transport system and enable more people to travel using sustainable modes:

Neither support nor oppose

Policies - Transforming Journeys - policies to transform the way people travel through the region, including east to west, and north to south:

Neither support nor oppose

Policies - Connecting People with Opportunities - policies for improving local connectivity across the region:

Neither support nor oppose

Policies - Making the Heartland Work for the UK - policies aimed at improving the way people and goods travel through the region, for example to airports, or as part of the freight and logistics sector:

Neither support nor oppose

6 Please provide any further comments you have about the Draft Transport Strategy's policies.

Comments:

All of the policies and proposals depend upon details of their implementation, and it is not possible to consider how these proposals may impact upon the character and natural beauty of the Chilterns AONB, nor is there any evidence in the strategy that such impacts have been considered in detail with mitigation etc in the preparation of the policies and proposals (the ISA is not specific enough).

The lack of integration between this transport strategy and any spatial growth strategy for the region also makes any judgement somewhat abstract.

There is an underlying assumption that economic growth in the region is inextricably linked to an increase in the movement of goods and people, whereas the thrust of sustainable development policy since the early 1990s, and of climate change mitigation in more recent years, has been to focus on reducing the need to travel (and this was indeed one of the 12 key messages fed back from earlier consultation that does not appear to have been given enough further thought). The general thrust of this strategy is to facilitate (and most likely induce) travel by upgrading existing and building new infrastructure.

It is unlikely that the goal of net zero carbon from transport in the region (to say nothing of the currently unwritten but necessary additional aim of protecting and enhancing the region's natural and cultural assets) will be achieved unless the transport strategy is integrated with a spatial strategy that enables people to significantly reduce their need to travel and also massively reduces the miles travelled by goods.

Draft Transport Strategy: Implementation and delivery pipelines

7 To what extent do you support or oppose the implementation and delivery approach we've outlined?

Neither support nor oppose

8 To what extent do you agree or disagree that the investment pipeline reflects the region's connectivity priorities?

Neither agree nor disagree

9 Please provide any further comments you have about implementation and the investment pipeline.

Comments:

We are offering a neutral position on questions 8 and 9.

In many respects the priorities identified have a sound rationale, and the focus on electrification, digital enhancement and increasing rail capacity using existing and currently decommissioned infrastructure (for both passengers and freight) is commendable. However, it is again hard to see how these priorities will be implemented as envisaged without a clear and explicit link to the spatial strategy for housing and employment growth in the region and beyond, especially in the context of the government's spending plans, which remain strongly focused on road building and increasing the attractiveness of London as a business location (e.g. though Heathrow expansion, HS2 etc.)

Draft Transport Strategy: Overall view

10 Overall, to what extent do you support or oppose the Draft Transport Strategy?

Oppose

11 Please provide any further comments you have about the Draft Transport Strategy

Comments:

As noted above, the strategy has much to be commended for, notably the focus on zero carbon and on sustainable and active modes of travel. It is, however, hard to see how either of these can be achieved without a clear link between this strategy and housing and employment growth plans for the region.

Ultimately, the achievement of the aims of this strategy will be dependent upon the spatial strategy for the region (and subsequent local plans and planning decisions) resulting in locations and forms of development that themselves facilitate viable and deliverable zero-carbon, sustainable and active forms of travel. There is simply no evidence that this will be the case, however, and, indeed, current developments going through the planning system across the region and beyond are being planned and built in forms that will lock-in car dependency for decades. If EEH is serious about achieving the aims of the transport strategy, it needs to start taking responsibility for housing and employment development mistakes that are happening today, and actively preventing their repetition in the future. A starting point would be an integrated land use and transport strategy.

Finally, the protection, enhancement and enjoyment of natural and cultural assets across the region are conspicuous by their absence from any meaningful consideration in the strategy. For example, the extent of the Chilterns AONB, which covers between 6 and 10% of the region (depending upon which source is referred to) is only represented by a single icon on the "at a glance" map on pp.8-9, and referred to as much as a problem as an asset in the text, with no meaningful policy or proposal in the strategy either to resolve the asserted connectivity issues or to highlight how strategic and other transport infrastructure in, through, and around the AONB needs special attention in order to both protect and enhance the character, tranquillity and natural beauty of the area, which are key drivers of the EEH region's success.

Integrated Sustainability Appraisal

12 To what extent do you agree or disagree that the independent Integrated Sustainability Appraisal is a robust assessment of the Draft Transport Strategy?

Neither agree nor disagree

13 Please provide any further comments you have about the Integrated Sustainability Appraisal.

Comments:

The ISA demonstrates many of the issues commonly experienced with SA of high-level strategies, i.e. the SA is not entirely conclusive because the policies and proposals in the strategy are often themselves broadly defined or delegate detail to more granular plans or decisions (policy 27 on rural connectivity is a case in point). In such cases, the SA can only really conclude that there could be both positive and negative impacts, and may provide some strategic context for how a more specific appraisal (e.g. an SA/SEA on a local plan or an EIA on a planning application) may be undertaken. Indeed, this is recognised in several places in WSP's report. With that caveat in mind, the ISA is an adequate assessment as far as it goes, but cannot really be described as "robust" since there is not enough detail in many of its assessments for its conclusions to not be challenged once further detail of proposals is known.

That said, the ISA focuses more on a range of individual proposals - particularly corridor enhancements - rather than looking at the region and its development as a whole. Had it done so, there might have been opportunities to consider the shape of the future development of the region in terms of the opportunities both for development and supporting transport infrastructure and the management of particular assets in a more strategic way. As noted with regard to the strategy itself, it is hard to see how such a strategic approach can be robustly handled with the transport strategy being considered separately from the spatial strategy for housing and employment growth. While the ISA may be "integrated" with the development of the transport strategy, it cannot really be described as fully integrated with the consideration of the future of the region as a whole.

Statutory status

14 To what extent do you support or oppose the approach set out in the Proposal to Establish a Statutory Sub-national Transport Body?

Support

15 Please provide any further comments you have about the Proposal to Establish a Statutory Sub-national Transport Body

Comments:

Establishing a statutory sub-national transport body for the EEH region could facilitate a strategic approach to transport planning and management in line with the Chiltern Society and Chilterns Conservation Board's "proposed common approach" (document to be circulated separately) albeit across a larger area than envisaged by CS/CCB, but still encompassing the whole of the Chilterns. Together, we have begun to engage with local authorities in the Chilterns AONB area to seek to implement this approach, and would similarly look to have the principles of this approach embedded in the work of any SSTB operating across the area.

We would suggest that, because of its sensitivity, the Chilterns area could be considered by the SSTB as a policy sub-area (probably one of several, with some overlaps).

The Board's support for the creation of an SSTB would be conditional upon the Body's terms of reference and/or remit explicitly recognising its duties with regard to the protection and enhancement of natural and cultural assets such as AONBs (which, if it is constituted as a public body will apply under the CRoW Act anyway but bears drawing special attention to since it seems so often to be forgotten otherwise).

About you

16 I am responding to this consultation as.....

An official representative of a business, local authority or other organisation

Business/organisation

18 In which area(s) of the Heartland region does your business/organisation operate? (In 2021, Northamptonshire will split into two unitary authorities – West Northamptonshire and North Northamptonshire) Please select all that apply.

Other (please specify)

Other area:

While the question says "tick all that apply" the page's settings only allow for one radar box to be checked. The Chilterns Conservation Board operates in: Bucks., Central Beds., Herts., Luton, and Oxon. (We would hope that Reading is being involved somehow in this too, since, while Reading Borough only adjoins the AONB, some of the proposals of its transport strategy cross the border into South Oxfordshire and the Chilterns).

19 What is your name?

Full name:

Matt Thomson

20 What is the name of your business/organisation?

Business/organisation name:

Chilterns Conservation Board

21 What is your role within the business/organisation?

Role:

Planner

22 Which of the following categories best describes your organisation?

Statutory body

Other organisation type: