



Campaign to Protect  
Rural England  
Standing up for your countryside

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Working locally and  
nationally for a beautiful  
and living countryside

16 April 2011

Dear John,

The Campaign to Protect Rural England is delighted to respond to Transport for the North consultation on its draft Strategic Transport Plan. We thank TfN's Engagement Team for providing us with a set of printed documents.

This response is on behalf of all CPRE which is an extensive network of more than 100 local groups and 60,000 members across the country.

### **About Us**

CPRE has been standing up for the countryside for 90 years. In this time, we've seen some remarkable successes. We've helped win protection as National Parks for some of our most remarkable landscapes, including the Lake District and Yorkshire Dales. We've helped to influence and apply planning laws that have, against the odds, preserved the special beauty and character of the English countryside.

Our members are united in a love of the countryside and they want to be able to continue to enjoy it, now, and for the benefit of future generations. We do call out policies and proposals that needlessly threaten to harm our countryside. Transport planning is a key area of concern for us as it influences where land is sought for future development.

Rural places are where we grow our food, it is where we have our natural resources, and it is where people live, and visit for recreation and leisure. Ultimately, CPRE wants sustainable growth for the North but also for the value of rural places to be understood by TfN when planning for the whole of the North. We call on TfN to ensure that the right strategic transport infrastructure, in the right places, for the right reasons is planned for the next 30 years.

We set out our key concerns for the countryside in more detail below.

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## **Climate Change**

CPRE acknowledges the threat to our environment associated with rapid climate change. We urge all stakeholders to plan future investment and development in accordance with the Climate Change Act 2008, and to meet our international commitments climate change that will hold the increase in global average temperature to well below 2°C above pre-industrial levels.

Problems in England likely to be associated with climate change include wetter summers impacting on farm yields and localised flooding. Internationally, problems are more severe with droughts, and sea level rises causing large areas to become uninhabitable. People forced to migrate from low-lying coastal areas will need to find new places to resettle. England also has coastal areas that will be impacted by climate change.

The Government has carbon budgets, associated with the Paris Agreement, and TfN must address them in the STP. Decarbonisation is highlighted as being urgently needed in the transport sector. For example, fossil based car travel demand must be reduced in the future. New technology, such as electric cars, needs to be harnessed. Irrespective of cleaner fuel road-vehicles, more and better public transport services, including rail, light rail, and bus must be invested in to give people reliable, affordable, safe and clean alternatives to car use.

## **Modal shares**

The UK is the fourth most car-dependent country in Europe; the same is true of dependency on road-based freight. This has occurred due to a focus on road-based infrastructure. The STP must try and reverse this unsustainable pattern of travel.

Decades of under-investment has led to a decline in and loss of many local bus and rail services, and rural places, in particular, have suffered. A clear priority for the STP must be to increase the patronage of public transport through investment in both infrastructure and services to improve connectivity across the north. The STP should also do all it can to improve the amount of walking and cycling, at the local level, with access to safe routes, and true integration into the overall transport system. Strategic infrastructure also needs to facilitate local level modal shift for example by providing more secure cycle storage at strategic public transport interchanges. Simple reliance on 'predict and provide' approaches to extrapolating past trends is completely inappropriate and unsuitable. A 'plan, monitor and manage' approach is more able to respond to new technologies, such as electric cars/bikes, segways, and travel smart cards for use on all types of public transport (like London's Oyster card).

## **Relevant CPRE research:**

### ***The end of the road? Challenging the road-building consensus, March 2017***

This CPRE report reveals that road-building is failing to provide the congestion relief and economic boost promised, while devastating the environment. It directly challenges Government claims that ‘the economic gains from road investment are beyond doubt’; that road-building will lead to ‘mile a minute’ journeys; and that the impact on the environment will be limited ‘as far as possible’. The report shows how road building over the past two decades has repeatedly failed to live up to similar claims.

The report is based on a study commissioned by CPRE and carried out by consultants Transport for Quality of Life (TfQL), which examined 86 official studies of completed road schemes. The TfQL research is available here.

[www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus](http://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus)

TfN, a partnership of civic and business leaders, cannot blithely ignore the evidence that more roads, leads to more cars on the roads, more greenhouse gas emissions and air-borne pollution, more congestion, lower air quality, more respiratory disease, more costs to the NHS and more early mortality. TfN needs to modernise its thinking, and in its Strategic Transport Plan stretching over several decades, adequately plan for the challenges that future generations face.

## **Environment Plan**

The Government set out its commitment to improving the environment in the 25-year plan launched at the start of 2018. The Government, with partners such as TfN, should implement the 25-year plan through investing in transport infrastructure that is based on genuine sustainable development principles. The environment must achieve net gains as new development is brought forward. Mitigation and compensation are key aspects of the Environment Plan. The STP must respect and be aligned with the 25 Year Plan.

## **National Planning Policy Framework**

One of the core planning principles of Government in its National Planning Policy Framework (Paragraph 17) to underpin both plan-making and decision-taking is that planning should “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.”

A key ask from TfN is that the next version of the STP should focus much more sharply on the integration of future land use and transport planning. In addition to more public transport investment and planning, more sustainable modes of transport, such as walking and cycling should be encouraged. But routes need to be safe and green. There is widespread acceptance that people's health and mental well-being benefits from green routes as document in a raft of recent research.

The concentration of higher density land uses around public transport hubs is important to minimise the consumption of greenfield land.

### **National Planning Policy Guidance (NPPG)**

NPPG stresses the need for plan-making to test different spatial options to maximise the potential of sustainable transport (ID: 6-007).

We recognise that the Strategic Development Corridors are economic areas identified for best value added in terms of strategic rail and road investment. However we recommend as the actual transport infrastructure is designed, options will need to be compared to ensure the most sustainable outcomes on a rather broader set of criteria.

In addition NPPG, gives design guidance to improve the safety, connections and efficiency of streets (ID:26-008). Disability should be fully considered too, and design should respond to the needs of people with disabilities in accordance with the Equality Act 2011. (ID:26-042)

### **Northern Powerhouse**

CPRE is supportive of the Northern Powerhouse to secure a prosperous economy, based on a healthy population and protected environment in the future. Connectivity of northern conurbations is identified as important. But, the North already has a dense road network and, as mentioned, is deficient in its rail and bus infrastructure and services.

### **Devolution**

CPRE sees the newly elected city-region mayors and combined authorities as having an important leadership role for the implementation of the STP when approved.

CPRE attended a Greater Manchester Mayor Green Summit on the 21 March where Andy Burnham set out his ambitions for Greater Manchester concerning a low carbon approach and the need for a spatial framework that has a brownfield first approach. His leadership in this arena is impressive and it should encourage other city region mayors to champion economic growth based on a low carbon approach.

## **Draft Strategic Transport Plan**

We acknowledge a tremendous amount of work has gone into the preparation of the Pan-Northern draft STP (a first of its kind) and for this we congratulate TfN. Overall, we support TfN's vision, as we agree that England needs a more balanced economy. We also want a thriving north of England, where modern and future transport connections contribute towards creating economic growth, jobs, homes, enhanced environments and overall support an excellent quality of life. But, we also want to see an appropriate scale of economic growth, and investment supporting economic sectors that will contribute sustainably to the UK economic performance in the short to long term.

More road-building will needlessly bring more greenfield land forward for development, and as a result induce more road-based travel, which has associated social and environmental problems. Simply planning new roads is not the right way to achieve the vision. Much more can and should be done to unlock the potential of our existing towns and cities, through integrated transport systems. New transport infrastructure really only supports development at the hubs of the infrastructure, not along the corridors.

We want transformational benefits through investment and planning to improve the sustainable connectivity of northern towns and cities. We agree with a smarter approach to travel, similar to that in London, with a more integrated transport system, based on new public transport infrastructure and services that simplifies travel across the North. The North should be able to effectively compete with global economies (which will be changing over the STP period in response to climate change), and needs comparable transport investment to London.

We have reviewed other Strategic Transport Plans. TfN's STP fares well in comparison to Midlands Connect, which is very road heavy, but it does lag behind Transport for the South East (TfSE), which has a much more low-carbon focus. For more details see here: <https://www.transport-network.co.uk/A-regional-platform-for-the-whole-country/14763> .

We applaud the idea of better connectivity between northern cities, and believe there is a robust case for more investment and more planning of strategic rail, such as a better connected Liverpool2 Port to enable a modal shift of freight from road to rail. This would remove a lot of unnecessary HGV traffic from our motorway (M6 and M62 in particular) and highway networks. It would, in line with stated national and local policies, reduce the threat posed to our countryside from large-scale, road-based, employment developments. There will be a need for some road travel, but the STP should manage the level of demand and should not accelerate the number of road users. We have witnessed in recent years an explosion of speculatively driven developments on land supposedly protected by Green Belt planning policy designation, such as in Bolton, Chorley, Knowsley, St Helens, Wigan, etc.

This type of speculative development is the least sustainable of all, with negative consequences for local communities and our environment.

We have heard from many communities opposed to planning consent decisions that fly in the face of stated policy. CPRE believes the STP and its delivery should be transparent and accountable. The Government with TfN, city-mayors, local authorities, and all relevant stakeholders must tackle the problem of policy non-compliant developments being permitted, and effectively put an end to this type of unsustainable development in Green Belt, once and for all. We keep seeing Government break its promises to voters on this issue. The STP ought not to cause further Green Belt harm. It should plan for everyone and stop inequitable and harmful development, instead steering developers to more sustainable locations to build development to facilitate needed growth in accordance with city-region level spatial plans, adopted local plans and neighbourhood plans, as they come forward.

Over-reliance on distribution sectors that move goods from one place to another is arguably a risky environmental strategy (let alone an economic one). The country becoming ever more over-reliant on imports, leaves the country vulnerable to global shocks. Internet giants are monopolising the online retail sector, and whilst competitive in price and delivery speed, offer only low-skilled jobs based on unfavourable zero-hours contracts. In the future, such large retailers will become even more automated in their operations, and therefore their contribution to future jobs is difficult to estimate. Even driver jobs will be potentially replaced by driverless vehicles in the future. CPRE supports local produce and food networks based on more local transport patterns.

In the past, we warned against large scale out-of-town retail parks, preferring land uses to be allocated via a sequential test, first concentrating them in existing urban centres, where accessibility is highest, for suppliers and customers. The recent collapse of major operators, demonstrate the volatility of the retail sector and a problem in such formats becoming no longer fit for purpose. Thankfully, people are choosing to shop more locally, to lower their carbon footprints, and in more human scale shops rather than spend long periods travelling to, then around, larger retail spaces.

Rural communities should have a mix of land uses so they can be relatively self-contained, or by increasing densities around public transport hubs, such as rail stations, to increase the justification for more frequent services.

The STP should encourage behaviour change in people to use the car as a last resort, as opposed to a first choice. The new strategic transport infrastructure should encourage 'the fullest possible use' of public transport, walking and cycling; it most certainly should not promote settlements in what is currently open countryside or protected Green Belt. Smaller scale transport improvements may actually be better.

The STP will need to specify road hierarchies, and then will need to ensure that environmental limits are not exceeded, such as upper limits to lanes in the countryside, and a reduction in pollution in identified Air Quality Management Areas or protecting tranquil areas from unacceptable levels of traffic noise.

We set out more detailed comments concerning the Strategic Development Corridors in Appendix One.

### **Summary**

Our comments are to ensure that the STP will enable sustainable and appropriate economic growth, but also adequately provide for the social needs, especially of rural communities.

The STP prime objective should be to improve the overall quality of life of people in the north, with economic growth recognised as a means, and not an end, in itself. Our countryside is a real asset, it is a national icon and it should be better valued as the STP is developed. The STP should enable economic development and preserve the special beauty and character of the English countryside.

CPRE's over-riding ask of TfN is to ensure that the next version of the STP is based on more sustainable and innovative solutions. We recommend more focus is needed on a significant reduction of private car travel demand, and road building due to the associated social and environmental harm.

Adequate funding of the STP will be a major factor in enabling the North to succeed in its economic, social and environmental ambitions. We would like to discuss with TfN ways of lobbying the Government for a fair share of investment in transport infrastructure for the North.

Yours sincerely,

**Daniel Carey-Dawes, Senior Infrastructure Campaigner, CPRE**  
On behalf of the CPRE Network across the TfN area.

## **Annex 1.0 Strategic Development Corridors**

We outline our key observations for each SDC below.

### **A Connecting the Energy Coasts**

CPRE notes that the Connecting the Energy Coasts Strategic Development Corridor is multimodal and seeks to enhance the strategic connectivity for people and goods, the advanced manufacturing and energy sectors in Cumbria, Lancashire and the North East areas. We agree that improving rail links is important, as is the need to improve non-road connectivity between geographies, particularly for Teesside and Tyne & Wear, with particular reference to TeesPort.

Friends of the Lake District (CPRE Cumbria) has previously responded to relevant consultations by National Grid over the repowering of the Nuclear power station at Moorside at Sellafield. There are two key issues referred to in its response:

- the first, is that nuclear power's future contribution to energy needs must be rigorously evaluated against social, environmental and landscape impacts. Issues relating to its cost effectiveness in terms of life-cycle analysis and safe disposal of radioactive waste must be resolved.
- the second, but equally important, issue in terms of landscape impact is where new energy development needs to be connected to the grid/network there should be a presumption towards placing power lines underground to avoid damaging impacts on the landscape, except where overriding nature conservation and/or archaeological considerations justify otherwise. National Grid must bury the lines wherever possible to reduce the visual impacts. In our view the same case applies for new and enhanced rail and road infrastructure. When making the case, and when implementing justified improvements, complementing the purpose of National Park and Area of Outstanding Natural Beauty designation must be pivotal.

The Friends of the Lakes submission to National Grid is downloadable here:

<https://www.friendsofthelakedistrict.org.uk/FAQs/where-are-national-grid-planning-to-put-these-pylons>

CPRE wishes to echo the message that protected landscapes are so because their contribution as a national asset is formally recognised. The STP must not contain any proposals that would degrade a protected landscape. CPRE does want rural communities to be better connected, especially by rail and local bus services.

The problems caused by recent flood events must be guarded against when strategic transport infrastructure is planned.

## **B Central Pennines**

CPRE is broadly supportive of the Central Pennines multi-modal Strategic Development Corridor. But, a key area of concern, as mentioned in the main response, is that Liverpool2 should be better served by strategic rail by 2050. The deficiency in strategic rail is causing road haulage to be speculatively driven, causing large employment sheds to be allowed in Green Belt against national and local planning policies. This is unsustainable, with detrimental impacts to communities across the North, particularly the North West in locations such as St Helens, Wigan and Bolton. What is most worryingly such unsustainable development has a cost to our environmental and human health. Liverpool Port must have the same capacity to transport goods on rail across to Hull, as London Port has to move its goods on rail to stop the negative impacts of moving freight via road.

CPRE is strongly opposed to Highways England's preferred option to develop a new road access to Liverpool2 port through Rimrose Valley Country Park, a green wedge connecting Bootle with the rest of Sefton, on land protected by Green Belt. The key reasons are the environmental costs and financial cost and the fact that alternative options could be more fully explored. There are also concerns about a flawed public consultation on the road options appraisal, as important demand modelling and environmental impact information was not made available to the public. CPRE did receive information on request, but only in the week prior to the consultation closing. CPRE strongly opposes this route and is seeking an alternative route that won't harm the natural environment so substantially. We cannot have all the freight arriving at Liverpool2 moved through protected countryside. For more information: [www.cprelancashire.org.uk/news/current-news/item/2481-cpre-lancashire-advises-the-leader-of-sefton-council-concerning-issues-relating-to-the-council-s-judicial-review-challenge-to-highways-england](http://www.cprelancashire.org.uk/news/current-news/item/2481-cpre-lancashire-advises-the-leader-of-sefton-council-concerning-issues-relating-to-the-council-s-judicial-review-challenge-to-highways-england) .

Other rural rail improvements seem to be disregarded, such as the Burscough Curves to permit Southport-Preston service and Ormskirk/North Liverpool to Manchester via a change of train at Burscough Junction. Also missing, are improvements to services Ormskirk to Preston so that through trains can go from Liverpool Central to Preston via Ormskirk.

Reinstatement of the Burney - Skipton route would enable more and better East - West travel from Preston to Leeds without the need to travel via Manchester. A new through service has recently been created from Wigan to Blackburn via Manchester Victoria, by linking two services to Victoria, but we query whether people use the whole of this journey. CPRE would support a rail station at Skelmersdale to improve connectivity to West Lancashire.

The STP key maps do not appear to show many of the existing lines capable of service improvement, e.g. Rainford Junction to Wigan. We would like to see the Parkside Strategic

Rail Freight and the employment sites in Bury better connected for future rail freight. We are concerned if the sites are not identified there is a risk they will be allowed for alternative and less strategic road based land uses.

Steve Rotherham Liverpool City Region Mayor, Andy Burnham Greater Manchester City Region Mayor, and others, will want to champion via the spatial frameworks of their respective combined authorities more freight on rail to improve the health of their populations.

### **C Southern Pennines**

This East-West multi modal Strategic Development Corridor connecting Liverpool to Hull is broadly welcomed, but it also presents a number of challenges. As above, the movement of freight on rail must be prioritised. As mentioned in our comments under the Central Pennines Strategic Development Corridor, the M62 serving Liverpool to Hull must not have increased movements by road based haulage. The motorway is already congested by such traffic and air quality suffers. More sustainable solutions must be found. But, we welcome that TfN talks about the need to be sensitive to the Peak District National Park. Friends of the Peak District has submitted a separate response and we share its concerns.

With regards to the Trans-Pennine Upgrade (TPU), CPRE urged Highways England to abandon the proposed Trans-Pennine Upgrade, adopt a holistic approach to the A628 corridor between the M67 and the M1, and put its efforts into alternatives that would demand manage existing traffic and sustain communities and the environment. If the scheme proceeds there must be another statutory consultation with all the final environmental assessment information available for the public to make an informed assessment of the impacts.

### **D West and Wales**

On the whole CPRE is supportive of the West and Wales Strategic Development Corridor that will better connect Cheshire, City Regions of Liverpool and Manchester, and Wales. This area of the North West is densely populated and the more people who can be conveyed by public transport, the better. We agree the Halton Curve should be reinstated.

### **E East Coast to Scotland**

Tyne and Wear Metro needs extending. In conjunction with a future re-opening of the Leamside Line and the Ashington-Blyth-Tyne Line to passenger services - which will both provide improved local rail and light rail services and free up capacity on the ECML.

## **F North West to Sheffield City Region**

CPRE is generally supportive of this Strategic Development Corridor connecting advanced manufacturing clusters and assets in the North West with Sheffield. We welcome TfN calling for improved rail for both passengers and freight. Again, the impacts of new and enhanced rail through the two National Parks and Areas of Outstanding Natural Beauty (Arnsdale and Silverdale and Forest of Bowland) must be protected. CPRE queries whether an electric rail service to Sheffield via the Woodhead Tunnel cannot be reinstated, as previously existed.

## **G Yorkshire to Scotland**

CPRE has concerns concerning this road based Strategic Development Corridor due to it being entirely road based and the North East and Yorkshire having a dense road network. We recommend that the advanced manufacturing and health sectors are fully supported, and that everything is done to ensure passengers are served by an efficient, reliable, clean and safe integrated multimodal transport network.

CPRE is opposed to proposed relief roads in Darlington (Northern Relief Road) and Durham City (Western and Northern Relief Roads).