Friends of the Earth response to 'Decarbonising Transport'

We welcome this consultation. We have kept this response brief but are very willing to provide further material or meet on any elements that the DfT would like to explore further.

Firstly, the context to this consultation is important to recognise, namely:

- Research for Friends of the Earth has shown how the DfT has systematically side-lined action on climate change in its strategies and guidance to the extent that it we felt it necessary to accuse the Department of going "rogue" on the issue. The abject failure to reduce emissions is further evidence of this. We look to the Transport Decarbonisation Strategy, under the leadership of a new Secretary of State, to correct this historic failure.
- UK leadership of the climate change COP in 2021 provides an opportunity for the government to shine. The decarbonisation of the power sector is an area the UK can rightfully be proud on (although more needs to be done). But the abject failure on transport will be under the spotlight and without a convincing transport decarbonisation strategy the government is exposed to international ridicule.
- The impacts of climate change, the related air pollution crisis, extreme weather, the Covid-19 crisis, and public concern on all these mean that business as usual is no-longer tenable. A recent survey by pollsters Opinium shows the public wants the government to respond to the climate crisis with the same urgency as it has with Covid-19.
- The DfT started the year badly with the announcement in the Budget that it will spend £27 billion on the RIS2 roads programme (2020-2025). Thankfully, this is now subject to a legal challenge on climate grounds. This is in addition to the £3.5 billion for local authority schemes. Fortunately, the year got better when the DfT was defeated in the Court of Appeal over Heathrow expansion '(*R (Friends of the Earth (and Others)) v Secretary of State for Transport [2020] EWCA Civ 214)'* and the government choose not to appeal the ruling. Subsequent statements by the Secretary of State, for example on active travel and in the forward of 'Decarbonising Transport' are perhaps promising and tentative signs that things are beginning to change.

One of the most important elements of the forthcoming Transport Decarbonisation Plan (TDP) is a clear carbon reduction pathway which is in line with the reductions necessary for compliance with the Climate Change Act and our international Paris Agreement commitments. The DfT has an unhelpful and illogical habit of failing to look at all transport emissions together. The pathway should include all domestic emissions and international and shipping emissions. It should also include the non-CO2 impacts from aviation, even though these are difficult to quantify. The precautionary principle, which the UK is signed-up to as the result of its ratification of the Rio Earth Summit, requires action even when there is scientific uncertainty.

The Strategy will also need to ensure compliance with air quality standards in all locations including in the opinion of Friends of the Earth, key city leaders, and many others the stronger World Health Organisation standards on fine Particle Matter (PM2.5) pollution (our response to air pollution must be led by the science). A briefing on transport and carbon budgets is available on Friends of the Earth's website.

Friends of the Earth commissioned Transport for Quality of Life to outline the changes in transport needed for the UK to deliver its fair share of carbon reductions in-line with the Paris Agreement. All of these are still relevant to the current Covid-19 crisis, for example:

- Respiratory illnesses such as Covid-19 are exacerbated by poor air quality, even it seems from a short exposure, so modal shift from cars and the electrification of vehicles are even more urgent (only the sale of battery electric cars rather than hybrids should be allowed after 2030 for new car purchases).
- The rapid development of segregated cycling infrastructure needs to be prioritised, including through £2 billion a year injection of funds so that the UK can match the cycling infrastructure of the best in Europe.
- In some areas roads need to be closed to provide more space for walking and cycling and reduce air pollution, particularly near vulnerable populations (schools, nursing homes, hospitals, etc), and also to provide space for developing public green space for physical and mental health in areas where Natural England standards are not being met.

The briefings Friends of the Earth and Transport for Quality of Life produced, which includes case studies of good practice from across Europe, are:

- Electric cars –identifies the importance of a more rapid shift towards electric cars, the dangers of increased motoring as a result, and how even with a very rapid transition to electric vehicles a very significant reduction in traffic reduction will also be needed (a cut of car miles of 20-60%) by 2030.
- Transforming public transport – showcases how public transport in parts of continental Europe have are coordinated by single governing bodies to provide "one network, one timetable, one ticket". This allows for much higher standards and improved service levels and achieves a much greater proportion of public transport use. It shows how bus regulation is a prerequisite for quality services. If comparable levels of public transport use can be achieved in English Combined Authorities as those in continental Europe, we estimate that car mileage in these areas will be cut by over 9%.
- Planning – identified the critical role of planning policy to constrain sprawl and ensure new developments enable people to travel and access services without needing to own or use a car. To do this virtually all new development should be compact, dense, high quality developments on brownfield land in existing urban areas.
- Active travel – showcases the best practice in Europe and how segregated cycleways and e-bikes could be transformative. It recommends a programme of strategic cycleways in England alongside all single carriageway main roads for 15km either side of every settlement, at an estimated cost of £10 billion (i.e. £2 billion per year). After publishing this briefing Leeds University has published research suggesting transport emissions could be cut in half through e-bikes, etc (particularly outside urban areas).
- An analysis of Dept. for Transport strategies and guidance – as mentioned above, an expose of how the DfT systematically side-lined or in effect ignored climate change in strategies and guidance. It recommends binding carbon targets and budgets for government departments and agencies, as well as regional and local bodies, to provide a link between

national carbon targets and implementation at all levels. It also recommends replacing the current transport appraisal process with an unbiased and transparent one that ensures compliance with carbon targets and budgets

- Road user charging – how the introduction of a distance-based eco-levy / road-user charging is necessary to constrain road use and meet carbon targets. Our estimates suggest a new distance-based Eco-Levy would raise about £8 billion per year for local authorities . The Eco Levy could be combined with free public transport to make it a politically sellable policy and fund a transformation in public transport use.
- Funding a transport revolution – identifies how in other parts of the world numerous different means are used to raise money to provide world class public transport and cycling/walking infrastructure, including money raised locally and regionally.
- Total transport and carbon budgets – identifies how total transport emissions have risen and why international aviation and shipping (IAS) should be included in a 'whole transport sector' carbon budget, including aviation's non-CO2 effects, and the use of international offsets for international aviation and shipping in carbon budgets should be ruled out. The analysis shows that unless IAS emissions are reduced significantly over the next decade and beyond, then the reductions in domestic transport will need to be even higher since finding any additional slack to cut in other sectors to compensate for aviation's high and growing emissions is going to be increasingly difficult, as well as unfair. The Committee on Climate Change's aviation emission target of 22 MtCO2e (or lower when the non-CO2 effects of aviation are considered) should be adopted to avoid aviation consuming nearly three-fifths of a net zero carbon budget in 2050.

In addition, we produced a summary briefing drawing the main conclusions from the collection of briefings identified above.

Finally, we commend the DfT for committing to produce a Decarbonising Transport strategy, and for deciding not to appeal the Heathrow case. It is a mistake to contest the RIS2 legal case when it is patently obvious that such a large-building programme is incompatible with climate change commitments. Regardless of the outcome, the programme should be scrapped, as should support for any aviation expansion across the UK. We hope that under the new Secretary of State the DfT will no longer be rogue on climate change, and if this is the case, we will be amongst the first to congratulate it.

Mike Childs, Head of Science, Policy & Research

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