Name Caroline Green	
Address Local Government House, Smith Square	
Postcode SW1 3HZ	
Email caroline.green@lga.gov.uk	
Company name or organisation (if applicable) Local Government Association	
Please tick one box from the list below that best describes you/your company or organisation.	
Small to Medium Enterprise (up to 50 employees)	
Large company	
Representative organisation	
Trade union	
Interest group	
Local government	√
Central government	
Police	
Member of the public	
Other (please describe):	
If you are responding on behalf of an organisation or interest group, how many members do you have and how did you obtain the views of your members?	The Local Government Association (LGA) represents over 400 local authorities in England and Wales. The LGA has worked worked with advisors from local authorities to inform this response which has been approved by the the LGA's Regeneration and Transport Board..
If you would like your response or personal details to be treated **confidentially**, please explain why:	

Consultation response form part 2 – Your comments

1. Are there any additional challenges that we should add to the matrix? Or any challenges we should delete?	YES	NO

Please explain your reasons and add any other topics on which you would wish to see further guidance:

We agree that the five headline goals set out should be the main drivers of UK transport policy. We do not propose the inclusion of additional headline goals, but would make the following comments on the existing goals:

- There should be more explicit acknowledgement that reducing the need to travel and promoting more active and sustainable forms of travel are key to achieving all of the goals set out. Investment in and development of local transport networks is the most efficient and effective way of achieving this.
- Under **supporting economic growth** there should be more explicit reference to the fact that the national economy is made up of local economies which function at the level of cities, city region or shire. These sub-regions are the level at which key economic decisions should be taken. The strategic national framework and infrastructure investment planning needs to support economic regeneration and infrastructure initiatives at the local level and provide a coherent context for local economic decision making.
- We also support the development of explicit de-coupling policies. These policies accept the need for regeneration and economic development and set out to achieve these policy goals within a framework that will deliver lower levels of traffic. De-coupling requires the very clear articulation of transport policy alternatives and the selection of options that will maximise successful regeneration outcomes policy and minimise the generation of extra traffic. In our view government should set out its clear support for de-coupling and work with local authorities and regional bodies on how to achieve de-coupling objectives.
- On **tackling Climate Change**, the national strategy for reducing greenhouse gas emissions from transport needs to provide to both provide a context for, and be informed by local action and decisions on carbon reduction. Decisions about national infrastructure will have an impact on local carbon reduction initiatives, so the connections need to be clearly understood. Given the urgency and enormity of the task and the long-term nature of planning and delivering transport infrastructure and investment, Local Transport Authorities need clarity on national policy and investment priorities to enable them to make decisions on

the best package of measures for their area. Such a package might include investment in public transport, demand management, land use planning to reduce the need to travel and promotion of active travel or smart choice measures. We would welcome a programme of support, advice and exchange of good practice to assist in understanding policy options and the relative value for money and applicability for local areas.

- The challenge to **improve quality of life and a natural healthy environment** should make more explicit reference to air quality and a need to reduce transport emissions (by promoting sustainable transport) as a means of enhancing health and quality of life. The goal should be to actively enhance the natural environment rather that minimize or mitigate against the impact of transport infrastructure. This is referenced in the document, but should be more strongly emphasised.

2. Are there ways in which we could make any of the challenges clearer and easier to understand or measure?	YES	

Please explain your reasons and add any other comments you wish to make:

See comments above

It is not at all clear how progress against each of the challenges will be measured or how it will link in with existing performance management mechanisms at the local level. We would welcome further discussion on this.

3. Which of the challenges do you consider as most important?

The consultation paper identifies delivering economic growth at the same time as cutting greenhouse gas emissions as the biggest strategic-level transport challenge we face. We would agree that these are the most important challenges for national strategic policy to address, however all goals need to be considered when taking decisions about transport.

With this in mind, there should be explicit recognition that the DASTS goals are cross-government challenges and they therefore all Government Departments need to be engaged in the debate, and the weighting attached to the goals (the Department for Health for health related benefits, DSCF on education and transport issues, etc).

Please explain you reasons and add any comments you wish to make:

The document highlights that there may be tensions between the different goals, but that there are measures that can deliver against all goals. We would agree with this, for example, measures that encourage modal shift towards public transport and active travel make a positive contribution to all 5 goals. The challenge is to ensure that consideration of economic benefits do not outweigh the environmental and social consequences when making decisions about future investment. This will require a different approach to appraisal for transport projects that accurately reflects national and local objectives and represents the true costs and benefits of transport schemes in meeting these objectives.

Current appraisal processes place more emphasis on cost-benefit analysis than on social and environmental objectives. It is clear that some of the factors which help to improve the cost benefit ratio are clearly contrary to the overall thrust of the present transport policies at a national or local level, and other schemes (such as those focused on social inclusion) do not score well. The clearest example of how appraisal processes can result in investment decisions that do not meet the 5 goals set out in DaSTS is that increased fuel use scores highly as a benefit as it increases government revenue, whereas spending money on public transport to get people out of their cars scores poorly due to the tax revenue lost. Furthermore, the system seriously underestimates the price of oil. Current oil price projections Government uses for the period 2010-2020 range from a low of £25 per barrel to a high of between £70 - £80 per barrel.

Reform of the NATA process should address these issues if investment is to be directed to schemes that deliver the best fit between the 5 stated goals.

4. Do you agree central government should lead on the development of solutions for the national network and international networks and that regional and local government should lead for the city and regional networks?	YES	NO

Please explain your reasons and add any other comments you wish to make:

We agree with the principle that decisions should be taken at the appropriate spatial level; that decisions on national and international networks should be taken at national level and decisions on local and regional networks should be devolved.   However, we do not accept that either can be planned in isolation form the other. As the LGA has demonstrated[1] the national economy is made up of local economies which function at the level of cities, city region or shire. These economies need to be supported by local and national transport networks - decisions on national infrastructure have significant implications for economic regeneration initiatives at the local level. It is important therefore that strategic planning bodies at local level are involved with the development of solutions for the national network and that decisions and strategy making processes are aligned.

This will require a coherent and coordinated set of strategies that make the links between planning at different spatial levels and between transport and other national plans and strategies. It will be important that the new national policy statements (NPS) on ports, airports and national networks (road and rail) are consistent with each other. These strategies need to make connections between different modes of travel, which will encourage greater use of sustainable transport. The NPSs also need to be consistent and linked with those been being drawn by other departments, for example on Energy, and with other policy areas for example, land use planning. Without a joined up and coherent approach we risk ending up with a confusing array of national policies and strategies that constrain local decision making.

Investment in national networks should not be prioritised over investment in public transport and infrastructure locally. Reducing the need to travel and cutting journey length are undoubtedly the most effective way of achieving the 5 national objectives. Investing in local transport and communications networks will contribute more to this than improving capacity and speed on national networks which will encourage more people to travel more frequently. We would therefore argue for more investment in local schemes as the most effective way of achieving the goals.

---

[1] Further information on the LGA's prosperous communities work can be found at
http://www.lga.gov.uk/lga/core/page.do?pageId=18730

Further clarification of what is meant for arrangements at the regional level is necessary. Current regional structures are under-going substantial change. Existing regional structures are not equipped to lead on the development of solutions for city and regional networks and it is not clear which regional body would undertake this task. The process also needs to take account of existing and emerging governance structures at the sub-regional level. It will be essential that Integrated Transport Authorities, Joint Boards and other sub-regional partnerships are directly involved in ensuring consistency between national networks and their city or sub-regions.

5. Are there any strategic corridors that should be added to the national network? Or any corridors that should be removed from it?	YES	NO

Please explain your reasons and add any other comments you wish to make:

There is a lack of consideration of the linkages and interdependency between national networks and local and regional transport networks. It is not possible to identify the most optimal solutions for development of national strategic network (road and rail) without considering local transport and regeneration policies which, for example, may be designed to reduce the need to travel, or provide sustainable travel options for new housing development.

The approach outlined in the consultation document is focused on strategic infrastructure connecting cities and major urban areas. Clearly there are good reasons for focusing on centres of economic productivity, areas of congestion and where environmental and social factors are most severe. However, there is a need to consider transport and connectivity needs of rural areas when developing strategy for the national networks as investment decisions will impact on rural areas, for example by increasing numbers visitors and increasing pressure on local road and public transport networks.

6. Do you have any suggestions on how best to ensure that solutions for the national network and international networks and for the city and regional networks are developed in a joined-up way?	YES	NO

Please explain your reasons and add any other comments you wish to make:

Ensuring that linkages are properly considered and producing a meaningful set of options will require a genuine partnership between central and local government. We would expect local authorities to be engaged in the process on the development and implementation of networks that will affect their area. A starting point would be representation for local government on appropriate steering groups and very closely involved in the corridor studies proposed.

7. Do you have any other comments on the approach, set out in this section, to taking forward the proposals contained in **Towards a Sustainable Transport System?**		NO
Please explain your reasons and add any other comments you wish to make:		
8. Would you like to see any significant changes (additions or deletions) to these Strategic National Corridors?	YES	NO
Please give the supporting evidence for any suggested changes. See response to questions 4 & 5 above Individual local authorities are best placed to comment on those corridors that affect their areas.		
9. Are there changes (additions or deletions) you would like to see to the strategic road infrastructure list?	YES	NO
Please give the supporting evidence for any suggested changes. See response to questions 4 & 5 above Individual local authorities are best placed to comment on proposals that affect their areas.		
10. Are there changes (additions or deletions) you would like to see to the passenger rail service list? As above	YES	NO

Please give the supporting evidence for any suggested changes.

11. Are there changes (additions or deletions) you would like to see to the rail freight service list?	YES	NO
Please give the supporting evidence for any suggested changes.		

12. Are there changes (additions or deletions) you would like to see to the air service list?	YES	NO
Please give the supporting evidence for any suggested changes.		