

Note to the TfN Scrutiny Committee 26th August from the ETOs grouping: item 5 - TfN Response to DfT's 'Decarbonising Transport' publication

1. In 2018 the campaigners in what is called the Environmental Transport Organisations (ETOs) grouping - which has membership from across the TfN area - made a number of representations to the Scrutiny Committee concerning the need for the forthcoming strategic transport plan to include a clear prioritisation of transport decarbonisation. Eventually this resulted in the commitments made in the 'Pathways to 2050' section of the STP, which we believe were groundbreaking. It said that 'TfN will lead the scoping and development of a 'Pathway to 2050' by 2020 [involving the] ... development of an enhanced approach to modelling scenarios/options, which is strategic outcomes-led and focused on definition, evaluation and programming of policy/intervention/package options designed to deliver strategic outcomes over the STP programme to 2050 *STP p.41pdf*. Since then we have maintained a dialogue with TfN officers about progress with the technical preparation of the pathway.

2. At the end of July we submitted a short note stating - in the context now of the DfT's *Decarbonising Transport* (DT) consultation - that we believe that the decarbonisation approach of the STP is still strongly relevant, although we also noted the developments since February 2019 which had changed the context for this work, including the adoption by government of the new 2050 Net Zero target. We also pointed to the very recently published [Emissions Reduction Pathways study](#) prepared for the West Yorkshire combined authority, which identified the truly challenging scale of the transport decarbonisation task.

3. Our note said that the STP had rightly recognised that 'TfN cannot achieve carbon reduction from transport on its own', and that therefore the single most important action that could assist this work would be if **the Department for Transport were to provide a clear transport decarbonisation policy framework, something which is absent at the moment**. Having reviewed the contents of *Decarbonising Transport* we had concluded that at the moment it was substantially ambiguous about many aspects of what that framework should include. We therefore identified three characteristics which we commended to TfN that the eventual *Transport Decarbonisation Plan* (TDP) and its carbon reduction pathway should be based around: It should be

- **a quantified pathway: built up from the development of scenario variants; compliant at the 'end of CB5' milestone in 2032 with CCC's sectoral cost effective paths within their new overall net zero trajectory; and one which DfT actually commits to then implementing** in terms of national level infrastructure programmes and a broader decarbonisation policy framework. At the moment DT does not promise providing even a notional pathway for transport emissions.

- **a single TTE pathway i.e including international aviation & shipping emissions**, which in turn requires the formal inclusion of IAS within the UK carbon budget, as again recommended by CCC in its 2020 Progress report. TfN will recall that the ETOs have made repeated representations about aviation policy. At the moment DT states that 'Airport expansion is a core part of boosting our global connectivity and levelling up across the UK.'

- **a pathway that is co-ordinated with and directive of the decarbonisation pathways now being developed by STBs, city regions, and local authorities, and relevant agencies such as Highways England**. DT is silent about how transport decarbonisation will be implemented down through subsidiary levels of transport governance and decision making without such an interconnected policy framework.

4. The ETOs are a member of the transport roundtable of the national [Cutting Carbon Now](#) initiative, and we participated in the roundtable's discussion on 18th August with the DfT officials responsible for developing the eventual TDP. I specifically asked about the TDP's intended approach to the 3rd characteristic: the decarbonising activity that had to be undertaken at subsidiary levels below the national. I suggested that the TDP needed to provide a sufficiently directive, national policy framework which would allow those subsidiary levels to plan, implement and interlock their own decarbonisation activities; and to do that the TDP would need to be built up from scenario modelling of the sort mentioned in the STP, and also put into practice in the West Yorkshire study. I said that, without this 'carbon leadership', it was not clear how decarbonisation down through the levels, and also involving the likes of Highways England, could be achieved in practice.

Unfortunately the DfT response to these points was half-hearted and ambiguous.

5. In the consultation response you are considering there is a great deal with which we agree - and that includes support for EV phase-in acceleration to 2032 *paras.4.8 & 5.1* and recognition that this in itself will not be sufficient and that demand management also needs to be considered 5.5 - but we specifically want to single out this statement: 'Central to this will be for DfT to build scenario planning into the TDP. The Setting the Challenge document didn't express what, if any work, DfT are already doing in this space, but we know that scenario planning is valuable to consider impacts of different policy drivers, regulations and behavioural change to make different futures plausible.' *para.3.3 and then elaborated on in 3.4*

6. We want to take this point one step further and suggest a critical role for sub-national transport bodies like TfN: to take up an essential and mediating role between on the one hand the DfT's national decarbonisation policy framework at the level above, and on the other the city region/local authority levels below. It seems to us that the **STBs operate at exactly the right geographical and institutional scale to take the forthcoming national decarbonisation framework, and then apply and co-ordinate it down through the subsidiary levels beneath.** The decarbonisation pathway already provided for in your STP, and now in preparation, provides just the mechanism to fulfil that mediating role, *as long as* the DfT understands that this can be the essential link in the downwards decarbonisation chain, and then designs the national policy framework to incorporate that role. At the moment the DfT don't appear to have noticed these possibilities; indeed the recent decision to appoint a 'Northern Transport Acceleration Council' seems to confuse the context within which the TfN strategy needs to make systematic progress.

7. So we would urge you to consider **adding the positive potential that this mediating role for STBs represents to your consultation response**, and then commend it to the other STBs for them also to support. We believe it will take a collective effort by all the STBs for them to secure their essential role in transport decarbonisation over the next decade. In the consultation response that the Cutting Carbon Now initiative makes to *Decarbonising Transport* we will be emphasising the importance of this critical element of the new framework's structure.

Anthony Rae
on behalf of the Environmental Transport Organisations grouping
25th August 2020