1. **Question 12.1**

1.1 In our original representation we highlighted that the transport sector has failed to reduce its CO2 emissions which remain at the same level as in the 1990s. Even with a shift to electric vehicles, the level of reduced car mileage needed to meet the UK carbon budget by 2030 is estimated to be between 20% and 60%, depending on the speed of the switch to electric vehicles and how fast the electricity powering them is decarbonised. Increasing road capacity generates traffic as has been shown by research repeatedly for the last 85 years and most recently by CPRE and therefore increases car mileage. This in turn increases congestion, air pollution and noise, encourages sprawling car-dependent development, and harms landscape and wildlife. Addressing the challenge of car dependency requires transformational change in travel behaviour enabled through the transport hierarchy, coupled with demand management of road capacity.

1.2 The context for our answer is that all these road schemes by increasing road capacity would generate increases in traffic and CO2 emissions. With the exception of A6 and A7 those listed do not appear to meet the requirements of NPPF para 102 (d) and are inconsistent with NPPF para 148 which requires ‘the planning system to shape places in ways that contribute to radical reductions in greenhouse gas emissions minimise vulnerability and improve resilience’ (our emphasis).

1.3 Transport for the North has made a strong commitment in its statutory Strategic Transport Plan page 80 to addressing the climate impacts of transport. ‘The ‘Pathway to 2050’ will set out a clear programme of phased introduction and implementation of key policies and measures... to 2050. TfN commits that the scale and type of programmes and interventions, and underpinning scenarios, will if necessary be adjusted in order to be consistent with the ‘Pathway to 2050’ over the lifetime of the Strategic Transport Plan.’ This commitment could impact on investment in transport in Doncaster Borough.

1.4 All these schemes would also be inconsistent with the Sheffield City Region Combined Authority (SCRCA)’s commitment to a 25% reduction in total travel demand by 2030, a 10% reduction in car miles by 2030 and a 25% reduction in car miles by 2040.

1.5 The Sustainability Appraisal 2015-2035 recognised the severe adverse impacts of implementing Policy 13. ‘The potential for significant adverse effects centre on the

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1 More than electric cars, FoE, May 2019
2 The End of the Road? Challenging the road building consensus Report for CPRE, March 2017, Sloman et al
generation of greenhouse gas emissions associated with the construction and operation of new development, including increasing traffic flows... On a policy specific level, there are potential negative effects associated with Policy 13 (Strategic Transport Network) – effect on climate change (Objective 11) and air quality (Objective 14). It also recognised the uncertainty surrounding investment in road schemes (para 7.1.4).

1.6 The Council’s Topic Paper 1 Climate Change lacks any sense of the serious implications of the transport sector’s rising proportion of the UK’s climate emissions. It notes that the SCRCA is identifying the region’s carbon budget but does not recognise that if South Yorkshire continues to emit CO2 at 2017 levels, it would use the entire budget by 2027. Net Zero for South Yorkshire has been set for 2040. As transport produces 37% of South Yorkshire’s CO2 emissions and 97% of these are from road traffic radical reductions and measures to achieve them are required. Instead the Local Plan appears to be continuing with transport policies that would worsen the climate emergency.

1.7 Q12.1a-e) None of the road schemes for the Strategic Transport Network (A1, A4, A8, and A10) appear in the Department for Transport (DfT)’s RIS2 2020-2025 and only A5 appears in the pipeline for RIS3 2025-2030. There is therefore uncertainty surrounding these schemes for decision makers and developers. None of the SRN schemes in Table 7 is based on robust transport evidence, as they have not been tested through either the business plan or the environmental impact assessment process. As they would increase travel by car/lorry and carbon emissions they are not consistent with national policy and not justified. A1 and A4 (The Pan Northern Route including the A19-M18 link); A8 (Improvements to M18); and A10 (M18/A1M Interchange) should be removed. Only the A5 (A1(M) Doncaster to Darrington improvements) could remain as it could be developed within the time frame of the Local Plan.

1.8 Q12.1a-e) With respect to the local road schemes, there is certainty for decision makers and developers re A6 and A7 as both are funded and in the process of construction or about to start. For the rest there is uncertainty and all except A3 are unlikely to be delivered within the plan period. A2, A3, A4, A9, A11 appear in the Doncaster Infrastructure Strategy Appendix 1 or the Annex and appear to have no business case. A strategic Outline Business Case was being developed for A3 in 2019 and a feasibility study was supposed to be

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completed in June 2020 but we have seen neither and therefore cannot respond in an informed way to the questions. The route does benefit from the Barnsley – Doncaster Rapid Transit bus service linking the centres of Barnsley and Doncaster via the intermediate settlements in the Dearne.

1.9 We make some additional comments about specific schemes below.

1.10 A1 - Pan Northern Route is promoted by Transport for the North in its Strategic Transport Plan as part of the Strategic Development Corridor for the South Pennines. There is a huge amount of uncertainty regarding the scheme, not only with respect to its substantial costs but also the need for an exemplar scheme through the National Park. As its extension east of the M1 is well beyond the time frame of the Local Plan a decision maker would ignore it.

1.11 Although the assumption is that the M67-M1 connection would be in place by 2035, the scheme is still in Stage 0 and has yet to pass into Stage 1 for its design, as it expected to do in July 2020. The scheme is most unlikely to be delivered during the plan period. The dualling of the A628 with 5-6miles of a tunnel under the moors in the Peak District National Park is against all policy associated with a National Park. Its environmental impacts can be deduced from the Trans Pennine Tunnel Feasibility Study which showed significant adverse environmental impacts at both ends of a tunnel that avoided any overground infrastructure in the National Park – with a shorter tunnel and the majority of the dualling lying in the National Park these unacceptable impacts would now be visited on the Park. Any extension of the PNR east of the M1 would inflict the same impacts on the countryside towns and landscape of the Borough.

1.12 A2 - Northern Doncaster A1-A19. No funding has been secured (as at Feb. 2020 The Doncaster Infrastructure Strategy Appendix 1) although the scheme is purported to form part of a Pan Northern bid for funding from Department for Transport Large Major Funds. However, the final August 2019 bid submitted by Transport for the North does not appear to include it8. This new route would encourage travel by car, and open up employment and housing opportunities for distant commuters. The claim that the road is needed to open up Site 441 Land at Carcroft Common, Carcroft; Carcroft - Skellow is negated by Adwick Le Street rail station providing an alternative sustainable means of travel. In this context a developer would be most uncertain about the future of the scheme.

1.13 A9 - This appears to be access over and above the new airport link road, The Great Yorkshire Way, opened in early 2016, which gave the airport access to the M18. It is entirely without purpose.

2. **Question 12.2**

2.1 There should be no investment in improving these strategic junctions or mitigating the traffic impacts as it would lead to increased dependency on travel by car and lorry. This would increase carbon emissions and air pollution. Investment in travel should follow the transport hierarchy - active travel first, then public transport and finally private car. Road space should be demand managed to reduce traffic. The Strategic Road Network is already adequately funded to the tune of £27bn. Contributions should instead be secured towards active travel and public transport to the allocated sites.

3. **Question 12.3**

3.1 Our answers are framed within the context of the impact of the Covid pandemic which has dramatically and radically altered patterns of travel behaviour, and increased home/remote working and the potential of the virtual office. Travel by public transport, both rail and bus, almost ceased and has yet to return to normal. For example in Greater Manchester the bus network is carrying about 40 per cent of pre-Covid patronage, Metrolink 35-40 per cent, and the rail network about 20 per cent. Station footfall at Piccadilly is about 65 per cent below pre-Covid levels. Data for pedestrian activity in the regional centre (Manchester city centre and Salford) is showing a recovery as a result of the return of non-food retailing, the hospitality sector and some commuting but is still 59 per cent below pre-Covid levels.

3.2 It is likely similar levels of reduced activity are being seen in South Yorkshire. Consequently none of the forecasts we currently have for road, rail or air travel have any validity going forward. There will be complex new travel and non-travel behaviours whether or not a Covid vaccine or therapies are available. In the shorter term with the requirement for social distancing there is an issue of public transport capacity. However there will still be an absolute need for mass/shared transit and for healthier active travel – there is not the road space for everyone to use a car and in South Yorkshire 29.5% of households have no access to a car.

3.3 **12.3 Rail transport Policy 13 B1-B7**

3.4 Rail improvements would:
- make best use of existing infrastructure

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- make a significant contribution to achieving net zero carbon with rail offering a third less carbon emissions than both car and road freight modes. Rail produces up to 10 times less small particulate matter than road haulage and as much as 15 times less nitrogen oxide for the equivalent mass haul\(^\text{10}\).
- reduce the impact of both cars and lorries on the countryside
- reduce the reliance of rural communities on travel by private car
- allow modal shift of passengers and freight from road to rail/water
- integrate land use and transport planning particularly housing and mixed use dense development with access to quality public transport and active travel facilities.

3.5 Hence in principle they serve a strong purpose with the exclusion of B1 and B6. The National Networks National Policy Statement, 2014, paras 2.30-2.36 states that the strategic rail network has a crucial role to play in delivering significant reductions in pollution, CO2 emissions and congestion and that there is a compelling need for its development. This supports policy B3, B4, B5 and B6. NNPF 2018 para 102e) requires that opportunities to promote public transport use are identified and pursued. Transport for the North’s Long Term Rail Strategy (in its Strategic Transport Plan 2019) is built on five themes, three of which are capacity increase, connectivity improvements and a railway that supports the fabric of the communities it serves. In principle it therefore supports the Policy 13 B1 to B7.

3.6 B1 A new ECML connection and railway station at the airport is unjustified. Investment in major rail infrastructure has to be proportional to potential demand. At present the future of aviation is uncertain and planning for an expansion of DSA to a size where it would support a link to the ECML is unsustainable. Plans for development of the link are in the early stages and scheme delivery would be beyond the timescale of the Local Plan. The route would also cut through the employment allocations and, despite DMBC’s claim that the Local Plan has inbuilt flexibility e.g. to accommodate the outcomes of the Covid pandemic, such infrastructure would have a substantial impact on these allocated sites. There is also a danger that the station would become a parkway station, attracting car journeys for drivers avoiding the centre of Doncaster and having no business within the airport policy area, unless it had extremely restrictive car parking.

3.7 B2 Rural areas are largely car dependent and continue to face a toxic mix of declining services and public transport cuts. Individual personal car travel is significantly more damaging in terms of carbon emissions, air quality and congestion per person travelling; uses more capital and revenue resources; and has a major effect on road wear and tear and thus the costs to the local public purse. More rail infrastructure would combat the current, harmful car dependency and provide low carbon access to employment, education and

leisure and support sustainable tourism; it would also reduce delay on rural-to-urban commuter routes.

3.8 It is essential if rail use is to be optimised that all stations provide inclusive access for all and are integrated with other modes as mini transport hubs with secure cycle parking, bus facilities, parking and drop-off/pick up provision and electric charging points. The proposed transport interchange at Hatfield and Stainforth is a good example of this. However the transport interchange would only come forward during phase 4 of the programme after much of the housing and employment sites are developed. To be effective in breaking car dependency and in order to inform travel planning such improvements and frequent public transport services should be in place and in place from Day 1 of occupation of the housing/employment allocations. Alongside their primary transport interchange function, stations, including those in rural areas, have potential as community hubs for residential, social, business and cultural needs.

3.9 B3 and B4 It is critically important to see the rail system as a network - investments in particular locations can have greater or lesser impacts across the rail network as a whole. A big part of the solution to the problems of rural connectivity by rail lie in investing in urban capacity at key pinch-points which may be distant from the Borough. For example, the biggest single constraint on rail capacity in the Yorkshire and Humber region is caused by congestion in central Manchester, notably the Piccadilly – Deansgate Corridor.

3.10 B5 Improved connectivity (together with capacity gains in many cases) can be achieved through rail service improvements, such as longer trains and more station stops, and innovative approaches to rolling stock such as tram-trains.

3.11 B6 HS2 has been developed as a lone project outwith the strategic planning process for both the railways and other transport networks, and land use. The delay to HS2 Phase 2b has put its construction beyond the date of the Local Plan. Uncertainty surrounds its development with the Infrastructure and Ports Authority considering that ‘successful delivery of the project appears to be unachievable’. HS2 would provide poor value for money - high speeds drive up energy consumption and infrastructure maintenance costs dramatically - and will benefit London rather than the North. Only a small proportion of HS2 passengers are forecast to transfer from air (3%) and car (8%); in contrast 24% of journeys are forecast to be made by train.

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11 Annual Report on Major Infrastructure Projects 2019-2020, Infrastructure and Ports Authority, Annex A There are major issues with project definition, schedule, budget, quality and/or benefits delivery, which at this stage do not appear to be manageable or resolvable. The project may need re-scoping and/or its overall viability reassessed.
to be newly generated travel. It also would have a devastating impact on the countryside and rural communities in Yorkshire that lie in its proposed path. The Doncaster Infrastructure Strategy para 2.21 refers to HS3 but this needs clarification as the term has been applied to a number of routes.

3.12 **Q12.3 Bus transport Policy 13 C1-C2**

3.13 C1 has a clear purpose. For both existing residential areas and new development bus services are fundamental to sustainable access and the workhorse of modal shift. This year the Government laid out its approach towards bus services in advance of developing its national bus strategy. ‘Buses have huge potential as part of a smart, affordable, sustainable public transport system. Fill a double decker with motorists and it’s possible to remove 75 cars from the road. They can help ease congestion in our towns, cities and countryside, improve air quality and support better connected communities.’ However, improving bus services alone will not address congestion, air pollution or climate change. There needs to be significant investment in rail with effective coordination between the modes.

3.14 Doncaster is one of the least socially mobile places in the country ranking 294th out of 324 on the index. Car dependency is forced on those least able to afford it through (a) relatively low paid jobs at out of town logistic centres and business parks close to motorway junctions and difficult to access by public transport - the i-Port is a good example of this; and (b) greenfield and large scale housing developments, such as the Unity/DN7 site (access to which would be addressed by the proposed interchange at Hatfield and Stainforth), poorly served by public transport and with street layouts that intimidate walkers and cyclists.

3.15 The list of the bus priority schemes cover the key strategic routes into/out of Doncaster and several e.g. Thorne Road A18, Wheatley Hall Road and Doncaster to the DSA would facilitate development proposed in the local plan. However, in order to be reliable and punctual and to address both air pollution and CO2 emissions quickly, buses must receive priority over all other vehicles. Policy 14 Promoting Sustainable Transport in New Developments does not specifically prioritise buses to achieve this. It is therefore inconsistent with NPPF 110a) which gives second priority (after active travel) to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use. According to the Government’s emerging approach towards buses, bus priority should be central to good journeys across a place.

12 [https://www.gov.uk/government/publications/a-better-deal-for-bus-users/a-better-deal-for-bus-users](https://www.gov.uk/government/publications/a-better-deal-for-bus-users/a-better-deal-for-bus-users)
3.16 Improvements to bus services will be challenging but could be achieved during the lifetime of the local plan provided there is leadership from SYPTE, SCRCA, all the local authorities and the operators, full accountability for the services and adequate funding. The Annex of the Doncaster Infrastructure Strategy indicates that DMBC is relying on its partnership with the SYPTE to achieve Policy 13 C). SYPTE came in for strong criticism in terms of its leadership of the bus partnership and its approach to holding operators to account in the recent South Yorkshire Bus Review.

3.17 C2 Robust transport evidence advises caution on Park and Ride (PnR) sites. Only a portion of PnR users’ car trips are shortened. Overall car use increases, with people who used to catch the bus for the whole journey now using the car to reach the PnR site. This leads to reductions in public transport use and in some cases less active travel. Dedicated public transport services supporting the PnR are also a further source of additional traffic. The essential conditions for traffic reduction to occur in future are a strategic subregional integrated parking and public transport strategy which intercepts car trips early and ensures public transport services are and remain attractive.

3.18 The strategic park and ride (Local Plan para 7.14) proposed to accompany the ECML to the airport is a good example of PnR in the wrong place. It would turn the new station into a parkway station, attracting car journeys for drivers avoiding the centre of Doncaster and having no business within the airport policy area, and leading to increased car use over a wide catchment.