

TR010034 – A57 Link Roads

DW DEADLINE 12 SUBMISSIONS

DW DL12 Submission 3: Government policy and implications for the EiP

Daniel Wimberley, Date Monday, 13th May, 2022

Unique Reference: 20029775

NOTES, ABBREVIATIONS AND REFERENCES

NOTES

NOTE: This is unfinished, sorry. I hope that nevertheless it makes sense, so far as it goes., DW

At this deadline I am treating these submissions as separate documents. The reason for this is to aid transparency. I now see that as the examination library is completely unsearchable, the only way you the ExA, current stakeholders and future readers can find topics easily is to have separate documents with titles which give some idea of the contents.

Note: This only partly applies now

I shall use “Highways England” and “National Highways” as date-appropriate, but usually I will refer to them as HE/NH. It is important to preserve this historical perspective.

When reporting what people say or have said or written, single quote marks (‘ . . . ’) mean – this is a rough approximation to what was said, it is the gist, and double (normal) quote marks (“ ”) means – this is a direct quote.

SOME ABBREVIATIONS

BCR	Benefit Cost Ratio
CC	Community Consultation
CC2020	Community Consultation for the A57 Link Roads scheme run by H.E. from 5 November to 17 December 2020
DCC	Derbyshire County Council
DfT	Department for Transport
DTP	Decarbonising Transport Plan
EiP	Examination in Public
ES	Environment Statement

ExA	Examining Authority
HPBC	High Peak Borough Council
H.E.	Highways England
IRP	Integrated Rail Plan
LIR	Local Impact Report
LTA	Local Authority Area
LTP	Local Transport Plan
NZS	Net Zero Strategy
PINS	Planning Inspectorate
RTPI	Royal Town Planning Institute
SMMT	Society of Motor Manufacturers and Traders
SRN	Strategic Road Network

4 REFERENCES

Gear Change, [walking and cycling plan for England](#), (July 2020) the active travel strategy which is backed up by a new agency, [Active Travel England](#), announced on 24th January 2022, based in York with 100 staff and headed up by Chris Boardman, who “delivered the first phase of Manchester’s public transport system known as the Bee Network.” (government website, as linked to above)

[Bus Back Better](#) the DfT’s bus strategy March 15 2021

[Decarbonising Transport Plan](#), or DTP July 14 2021

[net zero strategy](#) or NZS - one of whose chapters covers the transport sector, October 19, 2021

[Integrated Rail Plan](#) or IRP detailing investment of £96.4bn (2019 prices) out to 2050 on rail November 18, 2021

[Levelling Up White Paper](#) February 2 2022

GOVERNMENT POLICY: AND IMPLICATIONS FOR THE EIP

Chapter 1: Introduction

1. This EIP is faced with an intriguing and difficult question which is that as this scheme has progressed from consultation, to application for an examination to take place, to EiP the policy environment on transport has completely changed under our feet.
2. How does the Applicant respond to this highly unusual circumstance? As new policy emerges do they update their environmental statement? Do they adapt their case for the scheme? Are the assumptions and factors and values which underlie the model altered in line with what the new policy is saying? At one extreme they could update and adapt with

every change in the policy environment, whilst at the other extreme they could carry on as if nothing was happening. Where do they put themselves along this continuum?

3. The ExA faces similar dilemmas. What you clearly *have* done is to try and establish what the applicant's take on all this has been – how he is responding to this sea change. You have posed questions such as: 'has the applicant included the modal shift implied by government policy in the model?' Or you ask: 'has the Applicant fully considered alternatives?' Or: 'has the Applicant altered the objectives of the scheme?'
4. And the Applicant side steps these awkward questions, or says: 'we've incorporated x into the model' (but not y). Or the Applicant says: 'yes, we did assess alternatives' (but it was back in 2015, which in terms of the policy sea change which is happening all around, is a lo-o-o-ng time ago . . .). Or the Applicant says: 'no, no, the objectives haven't changed and it wouldn't be correct to change them.'
5. And then you have to decide how to proceed. Do you make your judgements and write their report in line with policy as it was at consultation stage (November 2020), or as it was at when they applied for an examination to take place (June 2021) or as it was at the opening of the examination (November 17th, 2021), or in the light not only of all the policies (the last of them published on November 18th 2021!) and of later developments arising from them?
6. Do you insist that the applicant take a certain position along the continuum I describe in para. 2 above? What makes the most sense? What will lead to the best decision? What are the constraints, if any, upon you in this, "highly unusual circumstance"?
7. There is another feature of current government policy which is highly relevant to this scheme and to the questions posed above and which has come to prominence over recent years, and that is that there has been a very important shift in the way government views and constructs policy.
8. The current government approach to policy in general and the funding that goes with it, is that policies must address current goals across the board, the overall policy framework matters, and policies and projects are assessed as to how they fit in. The random "good idea" or "how about this?" should not now get through the sieve – unless it "fits." This shift has been going on for some years but it is evident now more than ever. It is very much in evidence in the "Levelling Up" policy paper, and I will refer to it as "coherence."
9. But the problem for the scheme is not just the coherence issue. The "Levelling Up" concept and the associated policies are closely related to the policies on transport, and to those on net zero,ⁱ and "levelling up" is referred to often in the various policy documents. It is a major concern of this government, it has its own coherent set of policies, and they do not give much comfort to the Applicant.
10. This all gives added importance to the policy framework within which this EiP is now operating. If the framework has changed and this scheme is now a kind of orphan, what's to do?

Chapter 2: Outline

11. This submission first sets out government policies in the field of transport. I use excerpts from Government transport policy documents to show what the policies are, and follow these excerpts with a commentary. What drives these policies? Why are they so radical and so exciting? What do they boil down to?
12. There is a limited amount from the NZS as it is a recap of the others, except for the targets, which are there in black and white for all to see. And time did not permit me to include extracts from the IRP (Integrated Rail Plan). However I can assure you that the thrust is the same – get more and more passengers and freight onto the railways for carbon reasons and to remove traffic from the roads. ⁱⁱ
13. I believe that this new direction in government transport policy poses a very real challenge to the scheme and give three examples of where the scheme contradicts this new direction.
14. It is only fair to “hear the other side” and therefore I try to state what the *Applicant* has said about his compliance or otherwise with national policy on transport. How does the Applicant handle this situation where as I have pointed out the ground is moving under their feet?
15. I will outline the policies of “Levelling Up.” In contrast to both the set of “Levelling Up” policies and the set of new transport policies, this scheme does rather look like the “random good idea” with the striking difference that it has not popped into somebody's head quite recently but has been around for 50 years. But that does not alter the fact that it does not fit the new realities.
16. And finally how do you, the ExA approach this double sea change – the massive shift in transport policy and the new emphasis on policies and projects being in sync with each other? Are there obligations which you must fulfil?

Chapter 3: Government Policies on Transport

Section 1: a list of the relevant policy documents

17. I will be citing extracts from the following five policies affecting Transport in this chapter:
 1. **Gear Change, (walking and cycling plan for England), (27th July 2020);**
 2. **Bus Back Better (bus strategy), (15th March 2021);**
 3. **DTP – Decarbonising Transport Plan, (14th July 2021);**
 4. **NZS – Net Zero Strategy a chapter of which covers transport: (19th October 2021); **zzz DO!!****

5. IRP – Integrated Rail Plan – (18th November 2021)

I will also be giving an account of the following policy in section zzz of Chapter zzz below

6. Levelling Up White Paper

18. *Direct links to these publications are in the Endnotes* ⁱⁱⁱ

19. Note the dates and how they relate to the key scheme and examination dates. Item 1 predates even the Consultation, and as you will see it is no shrinking violet firmly setting out the first step in a revolution in thinking. Together with item 2 ambitions are clearly set out for a major shift towards sustainable modes and they both precede the application for an EiP to be held. 3 and 4 precede the opening of the EiP, complete with integrated policies, funding commitments and targets.

Section 2: the government's policies on transport *thin ??? zzz*

20. In this section I will focus on the strategic pillars of the government's policies on transport, on what the policies are, and on the mechanisms which will see them delivered. I have tried to omit detail on for instance the design of cycling infrastructure or the ins and outs of integrated ticketing, but inevitably little bits of that may get through wrapped up with wider matters or needed to show just how serious the government is.

21. I will cite extracts of the 5 policies listed above grouped under five headings:

- **Strategy, coherence, carbon goals, and co-benefits**
- **Delivery by national and local government**
- **Funding**
- **Delivery Targets**
- **Policies which have especially direct relevance to A57 scheme**

22. I have resisted the strong temptation to highlight this or that sentence as being especially noteworthy. These are already selected extracts and taken together they give a very strong impression of a set of policies which work together and point the same way and paint an accurate picture of the ambitions and thinking of this government. Some passages seem to support the scheme before this examination only for the very next passage to shed a sidelight on the matter which changes the perspective completely.

Sit back and 'enjoy the ride'! Yes there are a lot of quotations, but this gives you the "full flavour".

Strategy, coherence and benefits

23. Increasing cycling and walking can help tackle some of the most challenging issues we face as a society – improving air quality, combatting climate change, improving health and wellbeing, addressing inequalities and tackling congestion on our roads.

Bold action will help to create places we want to live and work – with better connected, healthier and more sustainable communities. It will help deliver clean growth, by supporting local businesses, as well as helping ensure prosperity can spread across the country and level up our nation.

Gear Change: *Opening words of Introduction* ^{iv} - page 8 **KEEPzzz**



24. Some people ask what levelling-up means in practice, and what difference it will really make to people's lives. This is part of what it means. As we build back from the pandemic, better buses will be one of our major acts of levelling-up. As successive mayors showed in London, buses are the easiest, cheapest and quickest way to improve transport.

Bus Back Better: *Prime Minister's Foreword, page 4*

25. Last year, we announced £3bn of new funding to level up buses across England towards London standards. This strategy describes how we will use that money. Just as we already have in the capital, we want main road services in cities and towns to run so often that you don't need a timetable. We want better services in the evenings and weekends, to reflect people's 24-hour lives and to provide safe, reliable transport for key workers. In places unserved or barely served by conventional buses, such as rural villages and out-of-town business parks, we want more demand responsive services with smaller vehicles.

Bus Back Better: *Prime Minister's Foreword, page 4*

26. They bring people to jobs, study and local services; they liberate people who are old, young, disabled and isolated; they save millions of tonnes of carbon and pollution, and thousands of miles of traffic jams. The double-decker bus is a symbol of Britain. Yet for decades, buses have been largely ignored by policymakers. Unlike rail, road aviation, cycling or walking, there was not – until now – a national strategy for buses. And unlike rail or road, buses have never – until now – had long-term funding commitments.

Bus Back Better: *Introduction – Our vision for the future of buses* page 7

27. COVID-19 has caused a significant shift from public transport to the private car. To avoid the worst effects of a car-led recovery – cities and towns grinding to a halt; pollution, road injuries, respiratory illness and carbon emissions all rising – we need to shift back quickly, by making radical improvements to local public transport as normal life returns. Buses are the quickest, easiest and cheapest way to do that.

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Its (*i.e. the National Bus Strategy's*) central aim is to get more people travelling by bus – first, to get overall patronage back to its pre-COVID-19 level, and then to exceed it. We will

only achieve this if we can make buses a practical and attractive alternative to the car for more people.

To achieve our goal, this strategy will make buses more frequent, more reliable, easier to understand and use, better co-ordinated and cheaper: in other words, more like London's, where these types of improvements dramatically increased passenger numbers, reduced congestion, carbon and pollution, helped the disadvantaged and got motorists out of their cars.

We want buses to be both tools of inclusion and the transport of choice

Bus Back Better: *Introduction – Our vision for the future of buses* page 8

28. Just as buses are central to the public transport network, bus reform is central to this Government's objectives. We are acting not just because buses are the easiest, cheapest and quickest way of improving transport – but because the bus is key to two of our wider priorities: net zero and levelling up.

Bus Back Better: *Introduction – Our vision for the future of buses* page 13

29. Buses are key to delivering wider government priorities

Buses can play a greater role in enabling access to work or more productive work. 44% of bus trips are for work or education, compared with 27% of solo car journeys. Buses can help drive better employment outcomes for disabled people, and in cities outside London, 77% of jobseekers do not have regular access to a car, van or motorbike. Having found employment, affordable bus travel helps ensure that work pays and can be sustained for everyone. But local bus fares have risen by 1.4% a year in real terms since 2010.

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Buses can improve productivity more widely, for instance by reducing congestion which affects all road users and costs urban economies at least £11bn a year.

Buses can be key to levelling-up; users are disproportionately from less advantaged social groups and places. Improved services will strengthen communities, sustain town centres and connect disabled and isolated people. But buses should not be seen, or promoted, only as transport for those without an alternative. There is clear evidence that they can be made attractive enough to draw people away from their cars.

For this reason, buses are vital to ensuring the economy meets Net Zero carbon emissions and driving the green transformation. In congested areas, substantial modal shift away from the car will soon be needed if clean air targets and the Government's broader climate goals are to be met. The only mode capable of sufficient expansion in the time available is the bus. We need more people to choose the bus for their journeys; we need to reverse the declines of the past.

Bus spending works and is high value for money. A Department for Transport (DfT) analysis of 33 major bus schemes found an average benefit- cost ratio of 4.2; in other words, they delivered benefits worth more than four times their cost. Buses generate a significant proportion of benefits which accrue to other road users and to society at large.

Bus Back Better: *Chapter 1 – The opportunity, page 18*

30. The Government is committed to transforming local transport, and its recent publication “Gear Change: A bold vision for cycling and walking” sets out its plans to transform the role cycling and walking play in our transport system. “Gear Change” and this strategy complement each other. Cycling, walking and using the bus are all part of the Government’s agenda to deliver a transport system that works for everyone, where walking cycling and taking the bus are a natural choice for shorter journeys.

Bus Back Better: *Chapter 1 – The opportunity, page 50*

31. Regulation itself will change, as it always has. But our goals will not change. We want transport to be cleaner, safer, healthier, greener, cheaper, more convenient, and more inclusive. Our approach (*DW NOTE: i.e. in the Future of Transport Regulatory Review*) will be underpinned as far as possible by the following Future of Transport principles:

- New modes of transport and new mobility services must be safe and secure by design.
- The benefits of innovation in mobility must be available to all parts of the UK and all segments of society.
- Walking, cycling and active travel must remain the best options for short urban journeys.
- Mass transit must remain fundamental to an efficient transport system.
- New mobility services must lead the transition to zero emissions.
- Mobility innovation must help to reduce congestion through more efficient use of limited road space, for example through sharing rides, increasing occupancy or consolidating freight.
- The marketplace for mobility must be open to stimulate innovation and give the best deal to consumers.
- New mobility services must be designed to operate as part of an integrated transport system combining public, private and multiple modes for transport users.
- Data from new mobility services must be shared where appropriate to improve choice and the operation of the transport system.

Bus Back Better: *Chapter 1 – The opportunity, page 50*



32. Transport decarbonisation is a dull way of describing something much more exciting and far-reaching.

33. Because transport is not just how you get around. It is something that fundamentally shapes our towns, our cities, our countryside, our living standards, our health, and our whole quality of life. It can shape all these things for good – or for bad. Bad is spending longer and longer stuck in traffic. It’s the huge increase in rat-running down roads which were never meant for it. It is millions of people literally, if slowly, being poisoned by the very air they breathe. Every one of these things also contributes to climate change.
34. And decarbonisation is not just some technocratic process. It is how we fix some of that harm. It is how we make sure that transport shapes the country and the economy in ways that are good. It’s about taking the filth out of the air and creating cleaner, quieter, healthier places. It’s about a second, green, industrial revolution, creating hundreds of thousands of new, skilled jobs, in some of the proud towns and cities that were the cradle of the first one.
35. It’s not about stopping people doing things: it’s about doing the same things differently. We will still fly on holiday, but in more efficient aircraft, using sustainable fuel. We will still drive on improved roads, but increasingly in zero emission cars. We will still have new development, but it won’t force us into high-carbon lifestyles. Because of the pandemic, some of it is happening faster than we expected. Homeworking has changed traditional commuter and shopping trips, probably for ever. Videoconferencing has changed business travel. These things, in themselves, will save thousands of tonnes of carbon – but they also create new challenges, such as a further rise in already proliferating delivery vehicles on the roads. This plan includes clear actions to cut delivery traffic and make it low-carbon, including harnessing new technology and ‘last-mile’ delivery consolidation.

Decarbonising Transport Plan: *Secretary of State’s Foreword, opening words: page 4*

36. Our ambitious roads programme reflects – and will continue to reflect – that in any imaginable circumstances the clear majority of longer journeys, passenger, and freight, will be made by road; and that rural, remote areas will always depend more heavily on roads. That is why our plan to decarbonise motor transport, the most ambitious of any major country, is so vital. . . . (DW NOTE: There follows a description of planned timelines for phasing out ICE vehicle sales.)

Decarbonising Transport Plan: *Secretary of State’s Foreword, opening words: page 5*

37. But we cannot, of course, simply rely on the electrification of road transport, or believe that zero emission cars and lorries will solve all our problems, particularly for meeting our medium-term carbon reduction targets to 2035. Road traffic, even on pre-pandemic trends, was predicted to grow by 22 percent from 2015 to 2035, much of it in cities, where new roadbuilding is physically difficult and disadvantages communities.
38. We cannot pile ever more cars, delivery vans and taxis on to the same congested urban roads. That would be difficult for the roads, let alone the planet, to tolerate. As we build back better from the pandemic, it will be essential to avoid a car-led recovery. As I said in “Decarbonising Transport: Setting the Challenge” in March last year, we must make public transport, cycling and walking the natural first choice for all who can take it. Many journeys

are short, could be done differently – and were done differently, in the very recent past. Even ten years ago, for instance, more children walked to school.

39. We want to reduce urban road traffic overall. Improvements to public transport, walking and cycling, promoting ridesharing and higher car occupancy, and the changes in commuting, shopping and business travel accelerated by the pandemic, also offer the opportunity for a reduction or at least a stabilisation, in traffic more widely. That will benefit everyone, drivers included .

Decarbonising Transport Plan: *Secretary of State’s Foreword, opening words: page 6*

40. All places will have the ability to take bold action to decarbonise transport, to radically change how people travel and level up the UK

Decarbonising Transport Plan: *Strategic priorities 5. Place-based solutions to emissions reduction pages 36 and 37*

b) Delivery by national and local government

41. Better cycling and walking infrastructure has allowed more efficient use of road space, to the benefit of all road users; cycling and walking routes are well connected with wider public transport services; cycling and walking measures are no longer seen as an after-thought but have moved to the very heart of considerations for all transport policy and planning, at all levels of leadership.

Gear Change: *“A bold future Vision” - page 12*

42. To make England an active travel nation, we need to take action to tackle the main barriers. We need to attract people to active travel by building better quality infrastructure, making streets better for everyone, and we need to make sure people feel safe and confident cycling. To deliver this, we need to ensure active travel is embedded in wider policy making, and want to encourage and empower local authorities to take bold decisions.

Gear Change: *“Actions, not just words” - page 13*

Significantly improved capacity and assistance for local authorities

43. We recognise that improvements will require building up the capabilities of local authorities, including new officer posts and training. We will ensure local authorities have the right levels of capacity. The new funding body and inspectorate, Active Travel England (see below), will be a repository of expertise in scheme design – but also in implementation and stakeholder management, which are just as important. It will have an extensive role promoting best practice, advising local authorities, training staff and contractors and allowing local authorities to learn from each other.

Gear Change: *“Theme 3: Empowering and encouraging Local Authorities” - page 30*

44. From next year (*DW Note: i.e. from 2021*) , Active Travel England will also begin to inspect, and publish annual reports on, highway authorities, whether or not they have received funding from us, grading them on their performance on active travel and identifying particularly dangerous failings in their highways for cyclists and pedestrians.

45. It is our intention that the commissioner and inspectorate will in this regard perform a similar role to Ofsted from the 1990s onwards in raising standards and challenging failure.

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46. We will consult on introducing new criteria to measure local highway authorities’ performance in respect of sustainable travel outcomes, particularly cycling and walking, when considering funding allocations for local transport schemes.

Gear Change: “*Theme 3: Empowering and encouraging Local Authorities*” - page 33



47. By the end of October 2021, we expect all LTAs to publish a local Bus Service Improvement Plan, detailing how they propose to use their powers to improve services. We expect actual delivery of Enhanced Partnerships by April 2022. From that date, the new discretionary forms of bus funding from Government will only be available to services operated, or measures taken, under an Enhanced Partnership or where a franchising scheme has been made.

Bus Back Better: *Introduction – Our vision for the future of buses* page 11

48. To benefit from the funding in this strategy, LTAs in such places will be expected to implement ambitious bus priority schemes and draw up ambitious Bus Service Improvement Plans. Statutory traffic management guidance will be updated to make promoting bus reliability an integral part of highway authorities’ Network Management Duty.

Bus Back Better: *Introduction – Our vision for the future of buses* page 13

49. Much of the work to improve services and manage the new funding streams will be done by local authorities, whose capacity varies significantly. We will therefore provide £25 million in 2021/22 to support partnership and franchising development, including a Bus Centre of Excellence.

Bus Back Better: *Introduction – Our vision for the future of buses* page 13

50. Plans must be developed in collaboration with local bus operators, community transport bodies and local businesses, services and people. They will be living, transparent documents, with targets. LTAs will need to routinely publish six- monthly progress reports against these targets.

51. Plans will demonstrate how bus services are integrated with other types of transport in their area such as connectivity to train stations, making journeys simple and stress-free for

customers. They must take account of cycling and walking schemes, complementing these forms of travel and not competing with them. We will publish detailed guidance on preparing a Bus Service Improvement Plan shortly, and update our existing guidance on Enhanced Partnerships and franchising.

Bus Back Better: *Chapter 3 – Delivering better bus services*

52. Robust enforcement of traffic restrictions can bring benefits for buses through less congestion. As we have already announced in *Gear Change: A Bold Vision for Cycling and Walking*, we will this year commence authorities’ enforcement powers under the remaining elements of Part 6 of the Traffic Management Act 2004. These powers will allow local authorities, rather than the police, to enforce against a range of moving traffic offences which can help ease congestion and help buses make progress more quickly.

Bus Back Better: *Chapter 3 – Delivering better bus services, page 46*

53. The Government will refresh its statutory guidance to local authorities on traffic management, to provide up to date and relevant advice. Statutory traffic management guidance will be updated to expect enhanced bus reliability as an integral part of highway authorities’ Network Management Duty. We will also consider how to facilitate sharing of good practice and experience in delivering bus priority schemes.

Bus Back Better: *Chapter 3 – Delivering better bus services, page 46*

54. Operators will gain things they have long sought: first, the certainty of continued support through what are likely to be several years of recovery; and second a commitment by councils and Government to tackle some of the biggest threats to the future of their operations, above all traffic congestion.

55. LTAs will have access to significant new Government funding streams and powers to make a difference in their areas, and significant assistance to build up their capabilities to exercise those powers. LTAs’ performance in exercising these new responsibilities will be taken into account when allocating this and other DfT funding.

Bus Back Better: *Chapter 3 – Delivering better bus services, page 44*



56. We will drive decarbonisation and transport improvements at a local level by making quantifiable carbon reductions a fundamental part of local transport planning and funding.

57. We will publish a Local Authority Toolkit in 2021, providing guidance to support local areas to deliver more sustainable transport measures.

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58. We will publish guidance for local authorities on support for shared car ownership and shared occupancy schemes and services

Decarbonising Transport Plan: *Summary of commitments: Part 2b: Multi-modal decarbonisation and key enablers, page 12*

59. The *National Model Design Code*, published in July this year, guides local planning authorities on measures they can include within their own design codes to create environmentally responsive and sustainable places. The *National Model Design Code* provides tools and guidance for local planning authorities to help ensure developments respond to the impacts of climate change, are energy efficient, embed circular economy principles and reduce carbon emissions.

Net Zero Strategy: Chapter 3 Reducing Emissions across the Economy, section v. Transport paragraph 48, page 163zz

c) Funding

60. We announced in May £2 billion of new funding for cycling and walking – representing a six fold increase in dedicated funding, the biggest increase this country has ever seen.

Gear Change: *Opening words of Prime Minister's Foreword, page 8*

61. Delivering good schemes needs a pipeline of assured funding. We will end the stop-go nature of previous cycling and walking funding, allowing local authorities and others to plan in a long-term way

Gear Change: *Theme 2: Putting Cycling at the heart of transport, place-making, and health policy, page 24*

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62. As well as spending more money, we will fundamentally reform how it is spent. The main current funding stream, the Bus Service Operators Grant (BSOG), is a fossil fuel subsidy. The new funding regime will take a holistic approach targeted at the delivery of the policies in this strategy and other specific benefits: growing patronage, increasing efficiency, improving the environment and securing modal shift from the private car.

63. Much of the work to improve services and manage the new funding streams will be done by local authorities, whose capacity varies significantly. We will therefore provide £25 million in 2021/22 to support partnership and franchising development, including a Bus Centre of Excellence.

Bus Back Better: *Introduction – Our vision for the future of buses page 13*

64. We will also support local areas to decarbonise by linking local infrastructure funding to solutions that cut emissions – aligning billions of pounds of investment to our net zero mission.

Decarbonising Transport Plan: *Secretary of State's Foreword, opening words: page 8*

65. By investing at least £12 billion in local transport systems over the current Parliament, we will support measures to reduce emissions at a local level, through the levelling up fund, active and public travel funding, intra-city settlements, and EV charging infrastructure.

Decarbonising Transport Plan: *Delivering decarbonisation through places, page 145*

d) Delivery Targets

66. Cycling and walking will be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030.

Gear Change: *“A bold future Vision” - page 12*

67. Cycling and Walking Investment Strategy

Targets for delivery for 2025:

- Double cycling from 0.8 billion stages in 2013 to 1.6 billion stages in 2025, where cycling activity is measured as the estimated total number of cycle stages made each year;
- Increase walking to 300 stages per person per year in 2025, where walking activity is measured as the total number of walking stages per person per year; and
- Increase the percentage of children that usually walk to school, from 49% to 55% of children aged 5 to 10 in 2014 in 2025.

Decarbonising Transport Plan: *Part 2a: Decarbonising all forms of transport, page 56*

68. As initially set out in the Williams-Shapps Plan for Rail, we are committed to introducing a rail freight growth target for all areas of the network DfT oversees, to encourage the continued growth of rail freight.

69. **Decarbonising Transport Plan:** *page 82*

70. Our potential pathway also indicates residual (*DW NOTE: i.e. excluding international aviation and shipping*) emissions from domestic transport could need to fall by around 34-45% by 2030 and 65-76% by 2035, relative to 2019 levels (see figure 21).^v

Net Zero Strategy *Chapter 3 Reducing Emissions across the Economy, section v. Transport paragraph 6, page 154*

e) Policies with specific relevance to A57 scheme

71. That (*DW NOTE: i.e. £2 billion of new funding*) will pay for first hundreds, then thousands of miles of protected bike lanes, so anyone can ride safely; low-traffic neighbourhoods, to stop rat-running and make it easier to walk and cycle; bus and bike corridors on some main roads; and funding for a massive rise in e-bikes, all of which will open up cycling to more and different people and make places better for everyone. There will be vouchers to pay for bike maintenance, free cycling training for everyone who wants it, and parking changes to discourage the school run.

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72. This strategy sets out our plans to start prescribing bikes on the NHS – with the bicycle in effect giant, universal prescription, with our bike lanes becoming huge, 24-hour gyms, free and open to everyone.

Gear Change: *Prime Minister's Foreword:*

73. To make England an active travel nation, we need to take action to tackle the main barriers. We need to attract people to active travel by building better quality infrastructure, making streets better for everyone, and we need to make sure people feel safe and confident cycling.

Gear Change: *“Actions, not just words “ - page 13*

74. **There will be less rat-running and many more low-traffic neighbourhoods**

Residential side streets across the country can be blighted by rat-running. Low-traffic neighbourhoods will be created in many more groups of residential streets by installing point closures – for example, bollards or planters – on some of the roads. It would still be possible to access any road in the area, but motor traffic would not be able to use the roads as through routes. Streets within low traffic neighbourhoods will provide clear, direct routes for cyclists and pedestrians promoting walking and cycling. Accidents, pollution and noise will be dramatically reduced for residents.

Gear Change: *Theme 1: Better streets for cycling and people, page 18*

75. **We will increase cycle parking and ensure that it goes where it is needed**

..... In residential areas, we will fund more bike hangars and other secure on-street storage, for people who do not have space to keep their bikes at home.

Gear Change: *Theme 2: Putting Cycling at the heart of transport, place-making, and health policy, page 25*

76. One of Active Travel England's functions will be as a statutory consultee within the planning system to press for adequate cycling and walking provision in all developments of over a certain threshold, and provide expert advice on ways in which such provision can be improved. We will work with Active Travel England and other key stakeholders to ensure that the importance of securing high quality cycling and walking provision is embedded within the planning system.

Gear Change: *Theme 2: Putting Cycling at the heart of transport, place-making, and health policy, page 26*

77. But we want to go further and look afresh at the statutory guidance about the duty (*the Network Management Duty in the Traffic Management Act 2004*) that is now over a decade old. We want it to reflect much more clearly the current imperatives of decarbonisation, encouraging healthier forms for transport and emphasis on technology. We will also look again at the duty itself in the Act to see whether it adequately reflects what we now believe good network management should be.

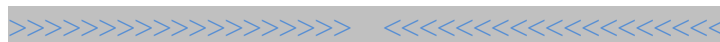
Gear Change: *Theme 3: Empowering and encouraging Local Authorities, Page 31*

78. We will choose several pilot places with poor health and low physical activity rates to deliver personalised care by working through social prescribing in primary care networks to incentivise GPs to prescribe cycling wherever appropriate.

Gear Change: *Theme 4: We will enable people to cycle and protect them when they do*
Page 36

79. We will establish a national e-bike support programme, which could include loans, subsidies, or other financial incentives, using the learning from other schemes in the UK and abroad for e-bikes, adapted e-bikes and other e-vehicles.

Gear Change: *Theme 4: We will enable people to cycle and protect them when they do*
Page 39



80. Our goal is to get bus use back to what it was before the pandemic. Then we want to increase patronage and raise buses' mode share. We can only do these things by ensuring that buses are an attractive alternative to the car for far more people.

81. *DW NOTE: Then follows a complete menu of improvements over two complete pages which the government wish to see, under 12 headings, with multiple suggestions under some of the headings such as 'different aspects of integration' e.g. bus services with rail, bus services with cycling, and between multiple bus companies, and being 'easier to understand and use'.*

Bus Back Better: *Chapter 2 – The buses we want, page 28*

82. Plans must be developed in collaboration with local bus operators, community transport bodies and local businesses, services and people. They will be living, transparent documents, with targets. LTAs will need to routinely publish six- monthly progress reports against these targets.

83. Plans will demonstrate how bus services are integrated with other types of transport in their area such as connectivity to train stations, making journeys simple and stress-free for customers. They must take account of cycling and walking schemes, complementing these forms of travel and not competing with them. We will publish detailed guidance on preparing a Bus Service Improvement Plan shortly, and update our existing guidance on Enhanced Partnerships and franchising.

Bus Back Better: *Chapter 3 – Delivering better bus services, page 40*

84. We will issue new guidance on the meaning and role of 'socially necessary' services, expanding the category to include 'economically necessary' services for the first time. This recognises the vital role that buses have in getting people to work at all times of the day and night. This guidance will set clear expectations of what we want to see. To drive forward the levelling-up agenda, this will include provision for economically disadvantaged areas. Making sure that people are connected to centres of employment, broadening their choice of work and education, is both socially and economically important.

Bus Back Better: *Chapter 3 – Delivering better bus services, page 47*

85. *DW NOTE: Page 58 is an entire page on ensuring safety, convenience and accessibility for ALL users of buses, with specific measures, for example, on enhancing and protecting provision of space for push-chairs and wheelchair and audible and visible on-board passenger information., backed up by accountability via the LTP system.*

Bus Back Better: *Chapter 3 – Delivering better bus services, page 58*

86. Average bus fares have risen by 403% since 1987*, compared to 325% for rail fares and 163% for motoring costs . Lower and simpler fares attract passengers. They should be seen as an investment not just in transport but in town centres, in social inclusion and in a greener future. We will expect to see fares policy as an integral part of Bus Service Improvement Plans

Bus Back Better: *Chapter 3 – Delivering better bus services, page 59*



87. Cycling rose by 46 per cent last year, a greater rise than across the whole of the previous 20 years and easily the biggest increase in post-war history. With £2 billion of new funding, we have put our money where our mouth is.
88. We have published plans to fundamentally reshape our bus network along public service lines, with £3 billion of new money, lower and simpler fares, thousands of zero emission buses, and more priority lanes. Again, these are the same policies that in London and other cities have brought about clear modal shift.
89. We have created Great British Railways to own and control the rail system in the public interest, to make services easier to use and to grow the network. We will build on the huge acceleration of electrification we've already seen since 2010, and will shortly announce further electrification schemes.

Decarbonising Transport Plan: *Secretary of State's Foreword, page 7*

- We will deliver the Prime Minister's bold vision for cycling and walking investing £2 billion over five years with the aim that half of all journeys in towns and cities will be cycled or walked by 2030
- We will improve rail journey connectivity with walking, cycling and other modes of transport
- We will review the National Networks National Policy Statement

Decarbonising Transport Plan: *Summary of commitments: Part 2a: Decarbonising all forms of transport, page 9*

- We will support and encourage modal shift of freight from road to more sustainable alternatives, such as rail, cargo bike and inland waterways.
- We will take forward measures to transform ‘last mile’ deliveries.
- We will complete our review of how to best represent decarbonisation measures in transport business cases and appraisals
- We will support transport providers to develop communications campaigns that encourage mode-switch and sustainable transport behaviours
- We will encourage and support UK businesses to lead the way in taking action to reduce emissions from their employees’ travel journeys through “Commute Zero”

90. **Decarbonising Transport Plan:** *Summary of commitments: Part 2b: Multi-modal decarbonisation and key enablers, pages 12 & 13*

Section 3: Brief commentary on “government policies on transport”

A transformative set of policies

91. These policies, taken one by one or taken as a whole point the country in a radically new direction. From wholesale promotion of cycling and walking opportunities to re-vamping local planning and ambition towards the concept of better places, and linking this to transport, from reforming last-mile deliveries to promoting bus use, and in tying funding to the commitment of authorities to these policies and to carbon reduction, this is a radical shift. The words “transformative” and “vision” occur prominently.
92. There are three main drivers of these policies and all are made quite explicit. The first driver is the absolute need to tackle carbon emissions. The second is the need to cut the ever-rising healthcare costs due to the obesity epidemic and due to air pollution. The third is to make our towns and cities better places to live and work. And all three are linked to “Levelling Up.”

The three drivers of policy: carbon, health and well-being

Carbon reduction

93. The first driver – carbon emissions - needs no further comment in this submission as it has been a major topic throughout this examination and I am a party to a joint request that you ensure that NH do a full and proper assessment.

Health, reducing traffic and the EV “solution”

94. The second driver - the need to tackle Healthcare costs caused by obesity and bad air - leads directly to the vastly expanded ambition for walking and cycling and to the need to reduce traffic in towns.
95. A word about this last element is necessary. **Reducing traffic in towns is an absolute goal in the policies and is not conditional on the extent of electrification of the vehicle fleet.**
96. This is for several reasons. Firstly this goal should be achieved as soon as possible, and the transition to electric vehicles is not a quick fix, it will take a long time. Secondly, every short trip on four wheels which could be made on foot or by bike is one more opportunity lost for health giving exercise. Thirdly, all vehicular traffic inhibits cycling and walking as it poses a threat and competes for precious road space. And fourthly, because particulate pollution, which is extremely dangerous to human health ^{vi} is caused by any vehicle, electric or otherwise.
97. All of these are recognised by the government and appear in government policy, as follows:
98. “We cannot simply believe that zero emission cars and lorries will meet all our climate goals or solve all our problems. They will not, particularly in reaching the medium-term Sixth Carbon Budget targets. By its mid year of 2035, the industry body the SMMT estimates that 46% of cars on the roads could be zero emission under a central scenario; percentages for goods vehicles will be lower still. [.....]
99. “As well as decarbonising private and commercial road vehicles, therefore, we must increase the share of trips taken by public transport, cycling and walking. We want to make these modes the natural first choice for all who can take them. We want less motor traffic in urban areas. Improvements to public transport, walking and cycling, along with the changes in commuting, shopping and business travel accelerated by the pandemic, also offer the opportunity for a reduction, or at least a stabilisation, in traffic more widely.
100. “Increasing car occupancy and encouraging public transport use are two measures that can immediately cut transport’s carbon emissions. They will help tackle chronic road congestion, freeing up road space for those with no alternative but to drive. And as more of our short journeys (43 per cent of all urban and town journeys are under 2 miles) are cycled or walked, so the carbon, air quality, noise and congestion benefits will be complemented by significant improvements in public health and wellbeing.

Decarbonising Transport Plan: Part 1a: Vision: Clean transport is better transport,
pages 29 & 30

Well-being

101. The third driver- the need to make our towns into better places - is a very welcome addition to the policy mix. Of course it has been mentioned by others but what is new is that it is now part of an entire suite of policies designed to revolutionise transport in our built-up areas and of a further suite of policies which form one of the government’s top priorities, namely “levelling up.” And in fact levelling up applies with equal force to the need, made

very apparent in the Covid pandemic, to achieve more equal health outcomes across the whole country and especially in the North.

The Policy Direction

102. The policies clearly have the ambition to see more people walking and cycling and using public transport, both rail and bus. (I have not had time to include extracts from the IRP but I assure you that the enthusiasm to grow passenger miles and freight-tonne miles is just as great as the enthusiasm for boosting bus travel.)
103. There is a clear acknowledgement that we have reached the limit. Our towns and cities must be relieved of traffic because traffic has such big negative impacts and these add up to a massive health burden, a drag on well-being, and a brake on the vibrancy of our town and city centres.
104. Not only have we reached the limit but these extracts taken together make it very clear that *we must row back* from the limit. There must be *less* “Traffic in Towns,” *less* pollution and stress and there *has* to be a new trend of more walking more cycling, and more bus usage. That is what these policy documents say, with one voice.
105. The direction of travel in transport policy is absolutely inarguable.

Chapter 4: The scheme, Highways England / National Highways and the Sea Change in government policies

Section 1: how this scheme contradicts the policies

106. The aims of current government policy set out with undoubted panache in the policy documents, constitute a heady cocktail and one well worth pursuing if I may mix my metaphors. The trouble is that the scheme before this examination goes in the opposite direction. Three examples follow.

Example 1: more traffic on local urban roads

107. Finally, finally, HE/NH have admitted that there will be more traffic on local urban roads.
108. At 9.54.9 HPBC said this: “In 2020, High Peak Borough Council developed a draft version of the Glossop Gateway Masterplan. An extract of the draft masterplan is submitted to the examining authority with this response for information. The masterplan is intended to reinforce positive impacts arising from the A57 Link Roads project whilst helping to address any residual negative impacts. It includes a package of measures designed to attract additional investment and generate further economic activities along the A57 corridor, as well as to deliver improvements to the “Glossop Gateway”.

109. The objectives of the masterplan are to:

- Promote the delivery of planned growth in the area and enhance business rate growth;
- Unlock housing and employment growth, providing more certainty to developers of local residential schemes;
- Identify proposals to address residual effects of the A57 Link Roads which may affect local quality of life, the environment, health and wellbeing;
- Manage local environmental and connectivity improvements by ensuring that new development is framed by high quality green and active travel infrastructure;
- Support the delivery of other Glossop and Hadfield town centre benefits; and
- Guide balanced and sustainable development

110. In terms of active travel routes, the masterplan identifies a current lack of options for east – west travel. It goes on to state that; “Increased traffic flow through Glossop is also likely to result in delays to pedestrians crossing the main vehicular routes through the town (i.e. severance). **As such, an assessment of pedestrian crossing facilities (and an assessment of the type of equipment, to ensure delays to pedestrians and vehicles are minimised) is likely to be needed. There may also be other environmental impacts of traffic on pedestrians that would need to be considered once the updated traffic flows are available, including intimidation (particularly if there are large negative changes in HGV traffic), noise, and air quality.**”

111. However, it is noted that the scheme does not consider such matters in detail or propose any mitigation in Glossop and Hadfield. (*my emphasis*)

112. This looks like a very bad story and so it is only fair are that we look at the other side. What does the applicant say about his compliance or otherwise with national policy on transport? After considering this important question in some detail I will ask the crucial question which results: What is the ExA to do about this?

113. It is hard to see what if anything the scheme as proposed contributes to this progressive and contented picture. The good impacts which it has are all focused on a very narrow corridor a long Hyde Road and Mottram Moor. Here indeed there may be some benefit in terms of reduction in traffic nuisance and a vastly improved Street environment. But the situation elsewhere is either equally appalling as now currently in Hollingworth and Tintwistle or worse than now in the local roads in Glossop.
114. It imposes more traffic on local roads thus discouraging active travel and increasing all the negative impacts of traffic on people and their environment. It does nothing to relieve from appalling traffic flows the main roads through Glossop and through Hollingworth and Tintwistle. To do this this it causes irreparable and permanent damage to the greenbelt so valued by many people in the area. All the main goals of government policy - improving fitness, improving health, improving urban spaces and the quality of life, are all set aside.
115. Here is an example which only came to light late on in the examination, at deadline 7 zzz.

SORRY ABSENT

116. Section 3: Levelling Up – a note on coherence between policies

117. The concept of “levelling up”

118. Levelling up is a powerful concept, suggesting as it does that every part of the country can be successful. Why should this area have pockets of deprivation? Why should there be such serious health problems (see Chapter 12 of the ES, para 12.6.25 and following).
119. Why it is so relevant to this examination is that the policies in the “Levelling Up” document are a) clearly conceived of as a package, b) will be reported on annually as a legal requirement and c) are strikingly relevant, many of them, to the area of this scheme. I have highlighted these. In the document they are billed as: “12 bold, national missions - all quantifiable and to be achieved by 2030.”

120. The policies of “levelling up”

121. The actual policies which form the basis of levelling up are set out in the Technical Annex as follows:

122. “Annex A: The 12 Missions to Level Up the UK

123. By 2030, pay, employment and productivity will have risen in every area of the UK, with each containing a globally competitive city, with the gap between the top performing and other areas closing.

124. By 2030, domestic public investment in Research & Development outside the Greater South East will increase by at least 40% and at least one third over the Spending Review period, with that additional government funding seeking to leverage at least twice as much private sector investment over the long term to stimulate innovation and productivity growth.
125. By 2030, local public transport connectivity across the country will be significantly closer to the standards of London, with improved services, simpler fares and integrated ticketing.
126. By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population.
127. By 2030, the number of primary school children achieving the expected standard in reading, writing and maths will have significantly increased. In England, this will mean 90% of children will achieve the expected standard, and the percentage of children meeting the expected standard in the worst performing areas will have increased by over a third.
128. By 2030, the number of people successfully completing high-quality skills training will have significantly increased in every area of the UK. In England, this will lead to 200,000 more people successfully completing high-quality skills training annually, driven by 80,000 more people completing courses in the lowest skilled areas.
129. By 2030, the gap in Healthy Life Expectancy (HLE) between local areas where it is highest and lowest will have narrowed, and by 2035 HLE will rise by 5 years.
130. By 2030, well-being will have improved in every area of the UK, with the gap between top performing and other areas closing.
131. By 2030, pride in place, such as people's satisfaction with their town centre and engagement in local culture and community, will have risen in every area of the UK, with the gap between the top performing and other areas closing.
132. By 2030, renters will have a secure path to ownership with the number of first-time buyers increasing in all areas; and the government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas.
133. By 2030, homicide, serious violence, and neighbourhood crime will have fallen, focused on the worst-affected areas.
134. By 2030, every part of England that wants one will have a devolution deal with powers at or approaching the highest level of devolution and a simplified, long-term funding settlement.
135. "The missions will be underpinned by a suite of public metrics to track progress and monitor the evolution of spatial disparities. The government will legislate such that it has a statutory duty to publish an annual report updating the public on the progress of these missions

136. Commentary on levelling up and the relevance to this EiP

137. What is striking about these levelling up policies is the way that they are clearly conceived as a set of policies which reinforce one another. Crime being effectively tackled, pride in the place you live in, the quality and attractiveness of public spaces, advances in healthy life expectancy, better performance at school, better paid and more skilled jobs, better broadband access, all support one another.
138. It is not a coincidence that the transport policies excerpts from which you have just read also form a set in the same mould. The safer streets, the reduction in traffic, the higher

proportion of people cycling and walking, the relative peace in town streets all these reinforce one another. I have covered this in my Written Representation at Deadline 2, I do not need to elaborate this point here.

139. Not only are the two sets of policies self-reinforcing but they also fit together. The changes which I outlined in my Deadline 2 submission and how they would work and the alternative transport package being proposed by CPRE at this examination clearly fit into the levelling up agenda. In fact the budget for the scheme would go a long way to kick-starting and / or enabling in full many of the initiatives which would be needed to fulfil the levelling up agenda including the contribution which good transport provision would achieve.
140. So for example Levelling Up's Mission 8 which is that well-being would improve in Glossop Dale and Longdendale and Mission 9 about enhancing pride in place and people's satisfaction with their town centre would clearly result from transport measures such as those that we are advocating at this examination: the greenbelt would be protected, active travel would flourish, health and fitness levels would improve, access would be easier, good spaces could be created and community and identity would naturally develop.
141. That is what is at stake in this examination.

142. Chapter 5: Coherence and the policy-making process

143. Sausage-making
144. Factions
145. Left-behind policies and interests and the attractiveness / inevitability of clinging on

146. Chapter 6: The role of the ExA in this situation

147. The policies are 5 facing on way and 1 aching the other. The 1 is well supported and very lucrative And destroys, arguably the planet. The SoS says that the 1 is compatible with the overall strategy of the government. But it is not. What is the Exa to do

148. Return to first principles, that's what a) what is right? B) what does the law say/ luckily they say the same thing.
149. Before finally considering how can the Applicant and the ExA properly handle a situation where as I pointed out the ground is moving under our feet? Do we look ahead or do we look back? What do we accept, and what do we discard? Do we accept what the SoS says (he may be wrong . . .)
150. It's hard for a government agency like HA when faced with a sea change in policy so great that they risk being stranded on their beach like a whale. This EiP takes place on the cusp of this change. We are sitting on the top of the unfurling wave of change. Of course this is unsettling, but it takes us back to morality "what is the right thing to do, when all things are considered 9and in this instance that means – a) what is good for the people of the area, and b0 what is the best solution for reducing carbon emissions as fast as humanly possible??"
151. between policies and more widely the general approach to making policy which the government now takes to ensure that policies work synergistically:

ENDNOTES

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- i Time and again in the NZS the phrases "levelling up" and "net zero" are paired like inseparable twins.
- ii The enthusiasm extends to reopening old ones, like the Dartmoor Line from Exeter to Okehampton.
1. iii Gear Change, [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
- iv See below for how this is presented in the document. This looks like commitment to a vision to me.

NOTES: 1) the words are hard to read, for digital-tech reasons, so the text is copied readably under the screenshots 2) for display reasons I split the screenshot into two halves, to make it more legible.

A bold future vision for a new era

We have a clear picture of a future we want to see, a vision for a transformation in our transport system, that will benefit us all.

England will be a great walking and cycling nation

Places will be truly walkable. A travel revolution in our streets, towns and communities will have made cycling a mass form of transit. Cycling and walking will be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030.

A bold future vision of cycling and walking in England:



Gear Change: screenshot of top half, page 12: "A bold future vision . . ."

Healthier, happier and greener communities

Peoples' health and quality of life is improved by more people walking and cycling; the number of short journeys made by car is vastly reduced, meaning people from all parts of our communities around the country can enjoy the benefits of cleaner, healthier, safer and quieter streets.

Safer streets

Nobody is afraid to cycle; every child is confident and safe walking or cycling to school; all road users treat each other with mutual respect.



Convenient and accessible travel

Cycling and walking are recognised as the most convenient, desirable and affordable way to travel in our local areas; more women and disadvantaged groups enjoy walking and cycling as part of their daily journeys; everybody has opportunities to take up walking and cycling.

At the heart of transport decision-making

Better cycling and walking infrastructure has allowed more efficient use of road space, to the benefit of all road users; cycling and walking routes are well connected with wider public transport services; cycling and walking measures are no longer seen as an afterthought but have moved to the very heart of considerations for all transport policy and planning, at all levels of leadership.

Gear Change: screenshot of bottom half, page 12: "A bold future vision . . ."

v

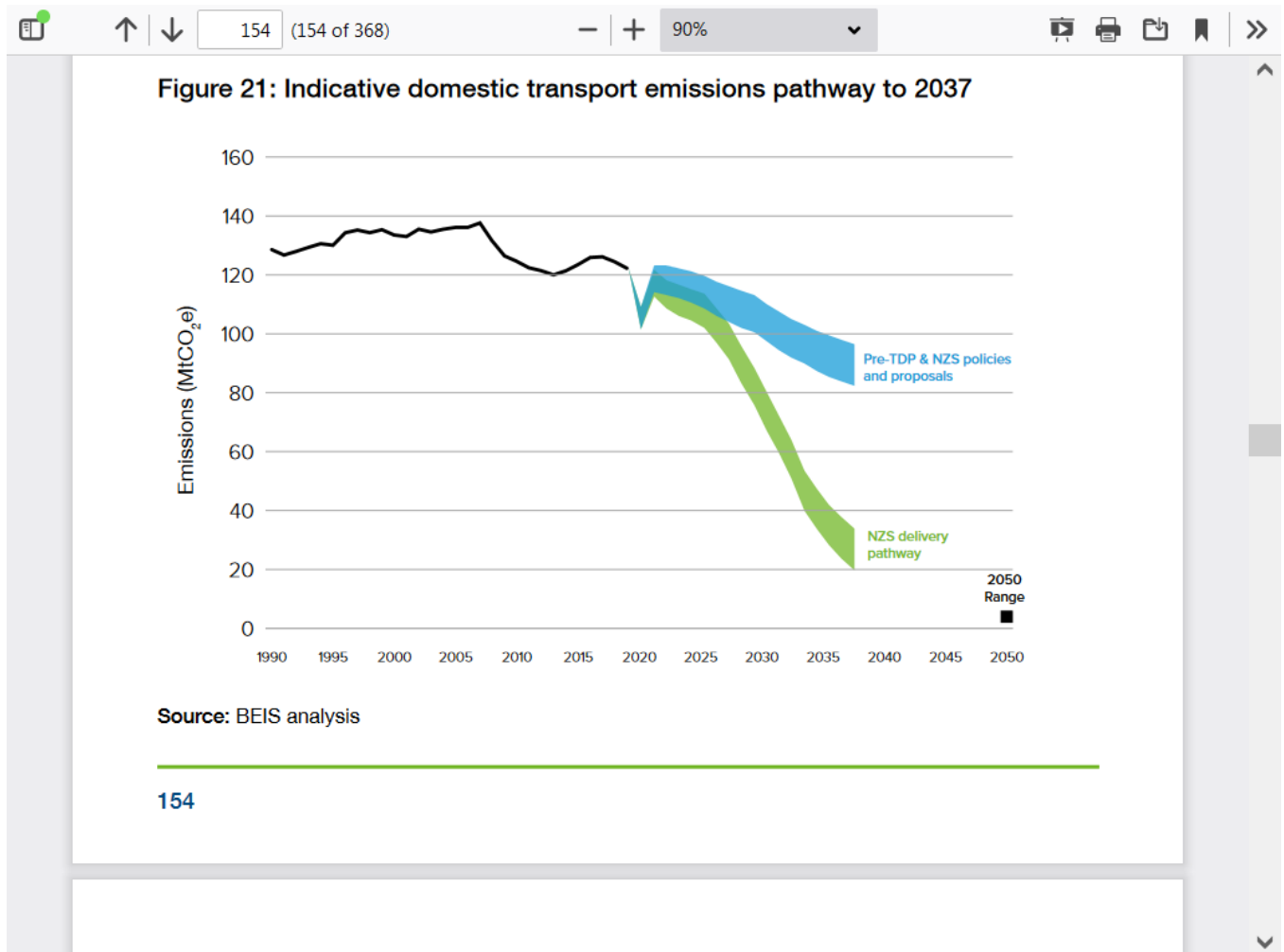


Chart from NZS, page 154

^{vi} The UK currently meets all legally binding concentration limits for fine particulate matter (PM_{2.5}) but we recognise that it is still one of the most damaging air pollutants to human health. PM_{2.5} can penetrate deep into the lungs and get into the bloodstream and has both short term and long-term impacts on human health. Short-term exposure to elevated levels is known to exacerbate the impact of pre-existing respiratory and cardiovascular health conditions, with elderly people and children the most vulnerable groups, whilst long-term exposure is linked to a number of health impacts including respiratory and cardiovascular disease, cancer and dementia.

The World Health Organisation (WHO) publish Air Quality Guidelines to inform the setting of air quality standards based on the impacts five key air pollutants have on human health. These guidelines are not standards as no consideration is given to whether the levels can be reached in any country or region, or indeed how levels could be achieved and at what cost. The WHO Air Quality Guidelines recommend a

considerably lower level for annual mean PM_{2.5} than the legal limit in the UK and across Europe (25 µg/m³ in 2019). There is consensus amongst health experts that reducing people's exposure to PM_{2.5} is a key priority for future policy direction. DEFRA *Policy paper: 19 August 2020: Environment Bill - environmental targets, updated 1 April 2022* <https://www.gov.uk/government/publications/environment-bill-2020/august-2020-environment-bill-environmental-targets>