TRANSPORT FOR THE NORTH

TfN response to the Governments Future Transport Regulatory review – call for evidence

Transport for the North welcomes the opportunity to comment on the Department for Transport's (DfT) 'Future of Transport Regulatory Review', as part of enabling the UK's transport system to support delivery of climate change targets. We have taken this opportunity to respond to both the general principles and aspects of Future Transport referred to, and particular aspects under the Roads, Mobility as a Service and Transport Data themes.

It is encouraging that the consultation document (and other transport and environmental related pieces) recognise the importance of an integrated approach to shaping the future of transport. Collaboration is also key to understanding and informing further consideration of suitable intervention measures required across the UK. Adequate regulatory frameworks are vital to facilitate innovation whilst supporting key principles for delivering a sustainable transport system fit for the 21st century, and assist in the post Covid-19 recovery.

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1. Transport for the North (TfN) – our role

TfN published its first Strategic Transport Plan (STP) and Investment Programme in January 2019. This STP is the culmination of an unprecedented collaborative effort between TfN and its Partners. Our role is to add value, ensuring value for money funding and strategic decisions about transport in the North are informed by our local knowledge, expertise and needs. It reflects the views of our Partners, bringing the regions together to consider transport solutions which connect the economic assets across the North, both internally to create an economic mass, but also externally as part of a global marketplace.

As a sub-national body, we support our constituent Local Authority Partners in the creation of their local transport and spatial strategies, and integration at regional and national level. This response has been shared with TfNs partners before its submission. We have also contributed to a joint STB response.

2. Covid-19 and STBs:

The COVID-19 global pandemic will, at least in the short and medium term, lead to changes to the way we live, work and do business. This is likely to have an impact on travel behaviour and demand. It is clear that the future for our transport system cannot be a case of business as usual. There are many positive behaviours that could and should be carried forward from the tragedy of this pandemic. As Sub-national Transport Bodies, we are committed to not just being the advocates of change, but being instrumental in delivery.

Covid-19 has shown that delivery of change to achieve objectives is possible if done at scale and pace. The high level of state intervention and investment required to tackle the covid-19 crisis sets a precedent for the level of intervention likely required to tackle climate change through decarbonisation of the transport system. The challenges and opportunities set out in the consultation document serve as catalysts for change to the transport system.

It is important to clearly articulate what success looks like, and how these different solutions can deliver a holistic approach. By supporting mass role out of workable solutions (suitable for the place in question), we can support future travel norms and behaviours that the public want to see made available. These issues are fundamental to the future of transport and go beyond the regulatory element of the consultation.

Sub-National transport bodies can add considerable value in providing strong and cost effective leadership on issues that are of regional significance. STBs have an ability to draw in expertise from Local Transport Authorities and Local Enterprise Partnerships, as well as delivery partners Highways England and Network Rail. Working at a strategic scale enables STBs to rise to big strategic challenges such as rebalancing economies, decarbonisation, and addressing the disconnection of communities. STBs focus on the regionally specific aspects of such challenges, where we can add most value and monitor and evaluate programme impacts to maximise benefits and value for money role out of National ambitions and principles.

This provides a mechanism and opportunity to make a real difference in this area and achieve economies of scale. STBs also have a track record of looking at

aspects across 'sector' boundaries, and we would also encourage a strong cross-departmental approach to deliver this agenda. A holistic approach and the co-ordination of numerous funding streams would ensure opportunities are realised to their maximum effect. The challenges posed by Covid-19 are significant for governments and local authorities everywhere. However, this also presents an opportunity to consider transport policies and shape Future Transport to deliver the vision we want to see.

3. The importance of future transport solutions which deliver TfN's ambitions for environmental and sustainable outcomes

Championing an inclusive and sustainable North:

TfN's Board members have set out aspirations for an inclusive and sustainable North, prioritising and supporting a net gain in environment and biodiversity, as well as supporting rapid decarbonisation of the transport network. Transport accounts for around a third of the UK's greenhouse gas emissions and reaching net zero by 2050 requires urgent action. An acceleration towards a zero-carbon transport network must be at the heart of public policy making and investment decisions.

When defining a future for the North's transport system, we need to ensure that we do this in a way that is sustainable and inclusive, embracing the diverse range of needs of our 15 million people and the environment that sustains them. We need an appraisal system that will enable investments that support transformational economic growth, whilst delivering environmental and social benefits.

Identifying and promoting low carbon transport intervention measures:

Future Transport solutions offer opportunities to make significant progress in our shared ambitions for a net zero transport system no later than 2050. This needs to be shaped by an integrated whole-systems approach, where sustainable low carbon mobility is the preferred option for most trips. This requires a long term, sustainable approach to planning, scheme appraisal and managing our environment and assets.

This may be possible through a combination of behavioural change; increased public transport use; new technology; on-demand, flexible or shared mobility; active travel; electrification (or other low carbon energy options). It should be supported by a whole systems approach, with much more integration of transport, energy, housing infrastructure and associated land use planning.

Regions which support in research and development, innovation and create new technological solutions grow faster than those that do not. This can provide a reliable pipeline of skills in the North, which could attract and retain employers to support a 'levelling up' effect. There is an opportunity to harness North's growing digital, energy and innovative capabilities, by using the North as early adopters or a test bed to strengthen the UK's competitive advantage globally.

<u>TfN's Future Travel Scenarios:</u>

The call for evidence outlines how Future Transport may have positive impacts (reduction of car ownership, increased in shared transport and active travel, decarbonisation) and negative impacts (competition with active travel over short distances, increased use of private modes or hire vehicles and decreased use of public transport).

It is important to remember that travel is a derived demand and that these are examples of future uncertainties driven by a range of factors (both transport and non-transport). These trends pose both risks and opportunities which will require vision based strategic planning. TfN have developed its Future Scenario Framework to tackle future uncertainty and understand a variety of road maps for the North towards our overall future vision. We intend to apply these scenarios to TfN's Analytical Framework to deliver robust, resilient and agile transport policies and strategies.

Our scenario development helps us understand the key drivers of future change and the policy levers or solutions available to reach our vision. By interrogating evidence on aspects of this call for evidence (micromobility, shared transit, MaaS) and other factors (such as active travel, modal shift, future technology and decarbonisation measures), we can better understand associated travel demand and carbon emission impacts across different scenarios.

This tool will also be made available to partners to increase capabilities across the North, ensure agile strategic planning, and support integration across potential boundaries as new innovative transport solutions are developed. We have collaborated with DfT during development of our Future Scenarios and will continue to do so, to ensure intelligence sharing, clear understanding of their intended use, and a consistency of approach were appropriate.

<u>Developing a Decarbonisation Pathway:</u>

Further to their application to our Investment Programme, TfN's Future Scenario Framework will enable the implementation of the decarbonisation pathways by providing a road mapping tool to assess carbon emission factors against different mode choices and transport solutions. This will allow for identification of carbon policy gaps and help to inform development of Transport for the North policy positions on decarbonisation and appropriate intervention measures. The 'Pathway to 2050' will set out how these policies and interventions can contribute towards meeting UK carbon budget targets.

4. TfN response to the Government's Future Transport principles and themes

a. *Achieving inclusivity as a fundamental principle for Future Transport:*

Whilst future transport solutions and enabling transport technology advancements are exciting, we must consider their applicability to the different communities and businesses. To achieve mass implementation of these different modes as part of our transportation mix, these solutions need to be accessible by all who can safely undertake travel by any particular means. This also applies to active travel. To achieve this, we believe inclusivity should be brought out further within the guiding principles for Future Transport.

Individual STBs and local authority partners are best placed to advise on whether micro-mobility options should be allowed on the road or cycle paths and the modal shift impact it may have. However, safety and inclusivity are critical and any solution should not be at the expense of pedestrian safety and disabled access quality or experience. Consideration needs to be given to the size of the device/vehicle in question, maintaining high quality public realm (e.g. not confusing or cluttered), ensuring consistency across local authority boundaries and appropriate guidance needs to be made available to users and police.

Any regulations and supporting activities should provide a framework that ensures all parts of society are able to use Future Transport and MaaS solutions. This should include:

- Appropriate consideration to development which supports the use of those with protective characteristics.
- Consideration towards affordability of solutions across the UK is also vital, to ensure technology does not outprice willing participants.
- Clear guidelines on how any solution may support the disabled to improve their connectivity and accessibility.
- Solutions which encourage widespread uptake of appropriate new modes by families and the older generation.
- Considerations need to include the societal and spatial assessment of different needs of urban and rural areas. Just because a technology, measure or service succeeds in one location does not mean it will succeed in another across the UK.

MaaS must be accessible to all demographic groups in the population, but existing regulations mean that it is likely to present a number of accessibility and inclusivity concerns. By design, MaaS service consumers will have greater access to a range of transport provision, which are not fully accessible to all and are inherently difficult to make more accessible. A study about MaaS in metropolitan areas (published by the Urban Transport Group in 2019) suggests that whilst people that are "Tech savvy" and "early adopters with a high disposable income" will respond positively to MaaS, this can leave out people with disabilities, those on lower incomes, and those who live in less central and dense urban areas.

b. *More consideration to different place types required:*

The main references to rural interventions throughout the call for evidence is in relation to flexible bus services. We would encourage the Government to consider rural risks and opportunities in greater detail across its Future Transport workstreams. These areas currently experience a variety of transport connectivity challenges, or are car dependant. This consideration should also be extended to understanding of semi-rural areas which are prevalent right across the UK.

Our assessment of Middle-Super Output Areas[1], we found that 27% of the North's population live outside of the North's large towns and cities and their immediate fringes. This includes areas classed as rural, small to medium urban areas, and towns with population up to 100k. Clearly some of the Future Transport aspects are more suited to large town and city areas, (just over 50% of the North's population living within a large urban setting over 250k population).

However, there are solutions and benefits that should be applied across all area types to increase sustainable and multi-modal connectivity options. This can increase opportunities available to those who live in such areas, such as access to jobs, education and leisure activities. This might be through direct A – B connections or enhanced and integrated multi-modal and public transport options.

Figure 1: TfN Area Types based on Middle-Super Output Areas

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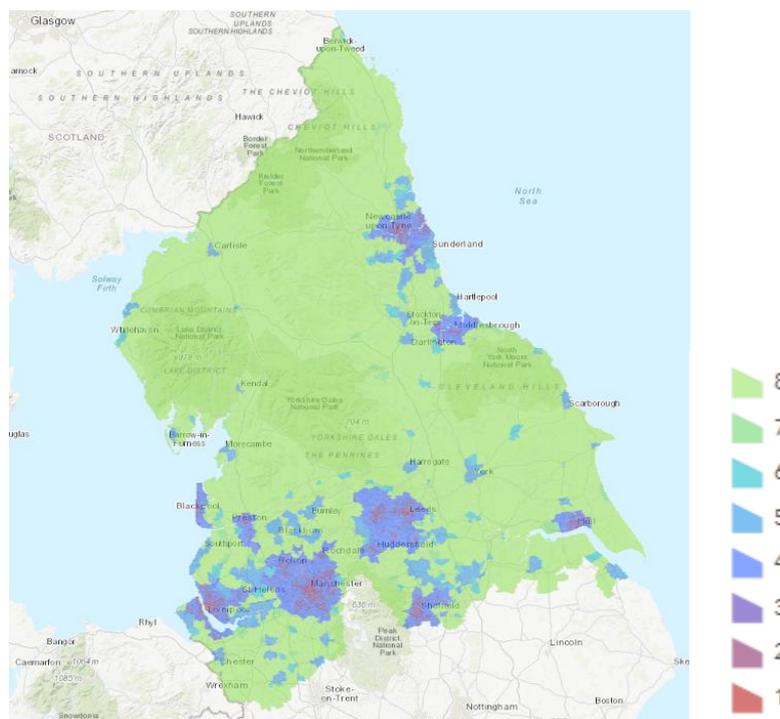
[1] *Based on NTEM CTrip-End classification, which identifies 8 Middle-layer Super Output Area (MSOA) types. TfN has redefined the top four categories within that classification ('Inner London', 'Outer London', 'Metropolitan Areas' and 'Urban Big'), to ensure relevance to the North of England and to distinguish between the city centre and suburban areas in the North. This is based on three categories: 2018 employment, population; proportion of people living in flats.*

A focus on solutions across all area types is key if the UK is to meet its decarbonisation targets and the pathways as set out by the carbon budgets.

c. *More focus on rail required:*

Whilst we agree that the majority of future transport interventions will be covered by the workstreams themes, we suggest consideration towards a rail workstream, as this feels omitted across the 8 workstreams identified. If the intention is to include this as part of the integration of different transport modes under MaaS, then we suggest making this clearer. This should be consistent with, and informed by, the findings from the recent Williams review. This is particularly important as TfN develops its plans for Northern Powerhouse Rail and integration with HS2 and the wider rail network.

Transport for the North have previously responded to the House of Commons Transport Select Committee Inquiry into trains fit for the future. TfN's Long Term Rail Strategy recognises the importance of enhancing rail's wider role in society and reflecting our global responsibilities, including the reduction of greenhouse-gas emissions, the transition to sustainable energy sources and reducing the pollution caused by transport activities. Developing new technologies to support a cleaner transport system and supporting modal choice to public transport is therefore a fundamental part of our plan to 2050. TfN fully supports development of battery and hydrogen traction noting the potential for regional and UK-wide benefits arising from the development of battery and hydrogen propulsion technology in the North, for example at Teeside, Liverpool City Region and Ellesmere Port, and Cumbria.

Train stations have the ability to act as strategic mobility hubs, using the rail network as a spine for integration with wider catchment areas via the highway network. Whilst rail will serve a substantial number of people, about 90% of our journeys are currently by road. 60 – 70% of people also chose to drive to work pre-covid. Therefore linking road and rail through station hubs has the potential to de-silo connectivity benefits and increase the commercial viability of MaaS solutions across the place types referred to above. This has, in part, been recognised in the recent Government provision of indicative local transport authority funding allocations for light rail and cycle facilities at railway stations.

Whilst significant proportions of journeys are by road, TfN holds an aspiration to deliver a significant modal shift to rail. Both NPR and the wider strategic rail network are vital to delivering TfN's Strategic Transport Plan aims for connectivity for people and businesses all over the north and UK. This includes across the different geographies, markets, services and visitor economies referenced in section 4b.

Further integration of smart ticketing mechanisms is also a must if we want to ensure interoperability of data across modes and support MaaS.

d. *Roads theme, particularly the Low or Zero Emissions Vehicles*

Road re-allocation measures:

We need to learn from experiences during the covid-19 pandemic, to understand and apply best practice regarding road space reallocation. Roads have the ability to be flexible and agile to required changes in use. Any successes realised during this period should see continued support to meet our overall vision, including the continued funding support and powers of enactment.

The ideal solution would be to have comprehensive networks of cycle/micro vehicle routes across a place. However, this can be challenging and land demanding to achieve. This transport challenge should be kept in mind during planning for any new developments, such as Garden Village schemes.

This will also be key to delivering better buses and also to increasing active travel uptake. These should be fundamental parts of our transport solution mix. Considerate urban design should create an integrated transport system that promotes walking and cycling is key, as this can encourage people to choose active means of travel. The integration of regional and local trips is vital to ensure we support the increase in these modes, providing the user with the availability, efficiency and safety of good quality connectivity options. **We will work with our delivery partners and local authorities to explore how best to achieve this, whether it is driving 'best in class' standards or supporting specification and development were appropriate.**

Petrol and diesel cars, VED call for evidence:

We were pleased to see the Government pledge to ban new petrol and diesel cars by 2035, something we called for in our Strategic Transport Plan. Reducing greenhouse gas emissions from the transport network, at a pan-Northern and a local level, is a key priority for TfN. We recognise that this is not just a transport challenge; any reduction in carbon emissions needs to be linked with a wider national energy strategy.

It was also positive to see the Government's ambition for between 50% and 70% of new car sales will be zero emission by 2030, and the HM Treasury call for evidence on exploration of ways to improve the ability of Vehicle Excise Duty (VED) to incentivise lower-emission car purchases. Potential VED changes can be a useful method of influencing vehicle purchase decisions (as a separate tax to any vehicle usage decisions), and can be a useful tool to shape a trajectory towards to phase out of fossil fuel vehicles.

It is important to note that if we are to meet the targets outlined, we must apply supporting policies to get their effectively. As the CCC point out, we are not on track for the 4th and 5th carbon budgets as things stand, and whilst the foundations are available, more action is required to meet these targets. It is also vital that we learn from successes and the lessons of other countries in this area, with the Netherlands and Norway indicating systems that could provide valuable insights to our own. **We would like to understand whether, as part of this theme, the Government is considering the use of policy levers in the form of fiscal measures (road user, pay at point of use, carbon credits)? We note the complexities and sensitivities in relation to policy levers such as these, and would be willing to work with the Government and our partners to further explore application risks and opportunities.**

Electric Vehicles:

Accelerated and co-ordinated delivery of Electric Vehicle charging infrastructure is required across local, regional and national networks. Dedicated and continuous funding will enable forward planning and rapid delivery of a widespread EV network which ensures no place is left behind. This, alongside modal shift (i.e. active travel and public transit) and behaviour change (i.e. working from home) can provide a transportation mix which supports improvements to air quality and the UK in meeting committed carbon budgets.

During the covid-19 pandemic, car is believed to be the safety mode of transport for distances not suited to active travel. This has the potential to challenge our aspirations for reduced congestion, improved air quality and decarbonisation whilst low-carbon solutions (i.e. EV, hydrogen) are not seen on mass.

The role of Government on setting policy for the deployment of EV infrastructure is key (i.e. how to tackle properties that have no driveway, working with large companies to understand any barriers to flexible use of carparks for evening charging). Consideration is also required for heavier duty vehicles such as HGVs, which require a more powerful solution. Other energy methods should be considered here, including the use of hydrogen. The North has seen a number of advancements in this area in recent years, with Teesside and Merseyside seeing advances in this area.

In response to a TfN call for evidence (Dec 2019), our partners outlined areas TfN might consider to support this aspect of Future Transport. These include:

- Comprehensive guides on charging points;
- A central point for strategic intelligence and co-ordination towards local, regional and national road networks and application across the region;
- Forums, best practice sharing and knowledge on usage of charging points and networks across the region (Local roads, Strategic Road Network and Major Road Network) to ensure EV capacity is effective and efficient;
- Research support, i.e. we have begun collaboration with Northern Distributor Network Operators to deliver strategic results;
- An advocacy role;
- Support supplier and business collaboration;
- Support through data intelligence.

We will work with our partners to understand the value added of each, and methods of supporting our partners and the Government in delivering aims for Zero Emission Vehicles. As with Future Transport references above, TfN are open to discussing these further with the Government and Delivery Partners (Highways England) to support enhanced delivery of sustainable transport solutions.

We note the work underway by Government to develop a plan for a rapid / high powered chargepoint core network during 2020. It is not clear whether this is solely electric or if consideration is being given to other energy sources such as hydrogen as per advice from the Committee on Climate Change. **TfN would like to know how this plan interacts with the wider Major Road Network and Local Road Networks, and are willing to work with Government and Highways England to assess this further to ensure quality coverage is**

achieved, integration is reached during the lifetime of the plan, and no place is left behind.

<u>Monitoring the Major Road Network</u>

Monitoring the Major Road Network (MRN) through Mobile Phone Data insights to understand journey purpose and demand – this data can provide insights as to why people are choosing to drive as opposed to using public transport or active modes, nudges can then be used to support modal shift. Data and funding for Major Roads could be used to bolster the North's MaaS offering through Demand Responsive Transport (DRT) services, behavioural nudges, and improved active travel spaces. Furthermore, access to car clubs through MaaS schemes or independently could see reliance on private car use and ownership decrease.

5. Response to the role of an STB towards Future Transport and Mobility as a Service

- *(Question 5c.3 - In this context, what role might sub-national transport bodies most usefully play, in your opinion?)*
- *(Question 4.1 - In your opinion, in the development of Mobility as a Service platforms, what should be the role of local authorities, central government, or other transport authorities?)*

TfN activity which can inform how STBs can support delivery of Future Transport solutions

Following development of our Future Travel Scenarios (see summary above), TfN undertook an initial stakeholder consultation to better understand the region's position with regards to Future Transport. Initial feedback has confirmed that TfN and its partners priorities remain in line with each other, with responses prioritising themes particularly focused on:
  - Environmental and sustainability (enabling decarbonisation);
  - Delivering an effective and integrated mobility system;
  - Focus on the customer and opportunities;
  - Modal choice;
  - Leading innovation (in particular in supporting the North as a test bed).

However, there have been different plans, strategies and levels of work undertaken to date across our region's networks. There is a varying uptake of future activities around Demand Responsive Transport, Smart Ticketing, Micromobility, Smart Parking, Electric Vehicles, Connected Autonomous Vehicles (CAVs) and Mobility as a Service (MaaS). Varying plans and strategies should not be seen as a negative, as there are a mixture of enablers which may best reflect the different local area types, strengths and opportunities seen across the North (and indeed the UK).

However, the current penetration Future Transport aspects is medium to low in the North and feedback suggests there are consistent barriers across the region.

TfN's partners have provided initial insights on how best TfN can support our local authority partners and the Government in planning and delivering successful Future Transport measures. This suggests that TfN could act in an enabling capacity, to bridge gaps in delivery and stimulate active development and implementation of Future Transport measures on mass. At the time of writing, the activities outlined in Table 1 require further work with our Local Authority Partners to understand their expectations, the opportunities and value added of each, and agree suitable methods. This includes consideration of TfN resource available to support such activities, and agreement via TfN Governance structures.

Depending on the suitable measure of delivery, some responsibilities outside of TfN's core activities and objectives, or that of our partners, may need to be matched by appropriate funding, responsibilities and powers (without removing

local authority powers already in place) to ensure effective delivery and implementation (i.e. enforcement).

Table 1: Emerging options for TfN (STBs) role in Future Transport, for further consideration and evaluation.

	Act as advisor, enabler and facilitator for the North
1	Build on excellent partner engagement to date through new or existing partner engagement groups focused on this, and related, subject matter. To facilitate integration, sharing best practice, lessons learnt and research and knowledge – in order in support local plans and strategies, and fuel progress on the 'Future Transport curve' across the sub-national area.
2	Consider collecting a repository of this knowledge will enable TfN to better inform policy and strategic direction within the North and enable knowledge transfer between partners. i.e. capture lessons learned from Future Mobility Zone bids and explore of how these bids and plans could be strengthened and opportunities supported from a regional perspective.
3	Supporting collaborative engagement and partnerships across the wider transport industry / private sector buy in and good practice, which support Northern partners in the delivery of Future Transport solutions.
	Provision of evidence and strategic support towards Future Transport uptake across the North
4	Continue to further develop frameworks to inform strategic planning which ensures resilience, agility and robust evidence (i.e. Future Scenario Framework, Decarbonisation Pathways, TfN Analytical Framework), and seek and support partner use for their own strategy development. Evidence building for Future Transport solutions in the North to create a reliable picture of future travel demand through our Future Scenario work and TfN Analytical Framework. Providing data collection, validation, analysis and evaluation.
5	Support accelerated and co-ordinated delivery of Electric Vehicle charging infrastructure across local, regional and national networks. Including other low / zero emission solutions such as hydrogen across the North's road and rail network. Improving the partner working and collaboration across the North, including with the energy sector. See section 4d of our response to Government.
6	Support interoperability and integration between modes to enable enhanced multimodal journeys (i.e. interaction with locally led aspects such as bus, light rail and active travel; better use of train stations as hubs and connection points).

7	Support towards strategic approaches for urban / rural areas, coverage of travel to work areas, and door to door journeys across both local and strategic networks.
8	Partners have sought further mechanisms for advice regarding regulations and enforcement changes.
9	Thought leadership and evidence towards integration of Public Transport, MaaS and active modes. Use of Data to monitor road and rail network demand and performance, utilising that intelligence to support the application of Future Transport solutions and to leverage good MaaS which induces modal shift.
10	Building an understanding of what 'Good MaaS' looks like; and support to local Strategic Transport and Sustainability Plans.
11	Development of a Data Strategy to enable enhanced use of data to capture and use passenger flows and demand, particularly the interoperability of data between systems. Applied as a pillar to support wider Future Transport activities and measures.
	Support trials and implementation of Future Transport measures, and effective transition to implementation and mass role out
12	Exploring trials and pilots and ensuring they fit the region's wider strategic transport objectives. Supported by adequate funding, responsibilities, powers additional to that at local level, and regulations which enable a 'fleet of foot' to deliver well timed Future Transport solutions. This may provide opportunities for Government to test policy and legislation through TfN as a delivery agent, before rolling out as national solutions. See section 5iii for more details.
13	Support Partner Future Transport trials to provide opportunities for further testing of an ideal MaaS delivery model and support transition into implementation and BAU. Supported by facilitating and collaborative engagement indicated above.
	Articulate the ambition of the North, support and inform the wider National Government agenda
14	Enable enhanced feedback to national Government to shape and inform the Future Transport agenda (including decision making and regulatory reviews).
15	Articulate the voice of the North in key Future Transport and MaaS at key groups, events and forums.
	Support Future Transport through provision of key enabling tools and application of TfN programme expertise

16	Enhanced utilisation of TfN's existing Open data platform: Open Data Platforms are key to enable MaaS and provide MaaS platforms with key information about network operations and network assets. To enable MaaS in the North a Pan Northern Open Data platform would be essential that provides a single source for Transport Data for the North.
17	Support further adoption of Integrated Smart Ticketing, information, and platforms on bus. Enables buses and smaller operators to be part of digital MaaS solution, and ensures bus services are MaaS ready.
18	Support further adoption of Integrated Smart Ticketing, information, and platforms on rail. Ensuring compatibility of its IST rail smart tickets/Account Based ticketing with other regional modes. This would ensure any future MaaS developments in the North are inclusive of rail and promotes interconnectivity in the North.
19	Progression of Real Time Information to ensure the ability of a MaaS solution to optimize services and improve efficiency in the network. To support MaaS in the North or in key Northern areas it would be essential to provide Real Time Network and Asset Information (EV Chargers etc.) to MaaS platforms.

6. Response to Part 1 (Micro mobility) and Part 2 (Buses, taxis and private hire vehicles).

As a regional body, we support our Local Authority Partners in the creation of their local transport and spatial strategies, and integration at regional level. As mentioned, our 20 Local Transport Authorities are on different points of the Future Transport curve. But some have already explored this transport option or are considering options for the future. Our local partners are best placed to provide intelligence and respond to these sections of the call for evidence. We have provided some general responses and guiding advice to these sections in line with our STP objectives and vision for transport across the North.

Micromobility

Question 2.1 - Do you think micromobility vehicles (such as those in Figure B) should be permitted on the road? Please explain why.

Micro-mobility clearly presents opportunities to enhance inclusive connectivity and modal shift, as well as reduce congestion, air pollution and carbon emissions if regulated and managed well. Micro-mobility use has the potential to boost public transport use through connectivity. These mobility solutions have the potential to play a significant role in supporting and enabling first mile/ last mile legs of journeys to and from bus and rail services, particularly within urban areas where there is by default more sustainable services due to the higher density of population (making micro-mobility schemes more commercially viable).

We note that the largest benefit in carbon terms from Micromobility would come from the mass adoption of e-bike in urban, peri urban and rural localities,

replacing the 5-10 mile "short" journey that makes up most car-based trips. The KiM Netherlands Institute for Transport Policy Analysis Mobility Report 2016 states:

- 'The average distance covered by e-bike was 5.3 kilometres. Hence the range of an e-bike was one and a half that of a 'normal' bike (averaging 3.6 kilometres per trip).'
- 'Almost 60 per cent of e-bike owners confirmed the statement that using their e-bikes had resulted in less travel by car and 30 per cent reported that it had resulted in less use of public transport.'
- 'Almost two thirds of all e-bike owners stated that since they had bought an e-bike, they cycled more frequently, over longer distances and faster.'
- 'Two thirds of all e-bike owners endorsed the statement that it was an advantage to be able to ride faster. Almost 90 per cent stated that getting tired less quickly was an advantage. The fact that people identified this latter argument as an important one underlined that convenience and comfort weighed more heavily than speed: for this reason, people tended to undertake longer trips, thus covering greater distances, rather than to ride faster.'

The Micromobility solutions highlighted in the call for evidence also have the potential to overcome barriers that currently deter active travel. Geography and particularly hilly areas can deter pedal cycle use. With their short range, micromobility solutions can help overcome these topographical barriers that put people off from walking or cycling for what would otherwise be a comfortable distance by these modes.

We agree with the intention to trial these aspects further and both real world and regulatory tests will allow a better understanding of approaches, and useful lessons can be learnt from both positive and negative experiences. Simple and easy to follow guidance and legislative requirements is vital, as well as management and regulation powers to ensure proper use of any transportation method. We feel the North provides an ideal test bed to understand further how different micro-mobility solutions may impact different place types, but also importantly how these may be integrated across a wider geographical area to deliver consistency and integration were appropriate. Providing a wealth of understanding to support the North and wider UK.

With that in mind, we agree with the reference to Local Authorities or regional mayors potentially having more powers to deliver such transport options at a local level. With a national framework in place to support this and allow for flexibility in delivery. To achieve optimum delivery and management of such options, it is important to know and understand the local area. This includes how infrastructure, landscapes and spatial plans differ. This is particularly relevant across the North where we see a range of urban, semi-urban, rural and remote place types. For example, East Riding of Yorkshire, Transport North East and Liverpool City Region are all trialling micromobility and bike share options at present. This potentially provides a wealth of understanding to support the North and wider UK if used in the right way.

Our local partners will be able to advise on whether micromobility options should be allowed on the road, cycle paths or pedestrian areas (as above), and the modal shift impact it may have in their area. However, we would point out that

safety and inclusivity are a key importance here, and that any solution should not be at the expense of walking and disabled access quality or experience. It should also align with individual approaches to place making and active travel strategies such as cycle network and 'place' strategies seen across the North. The examples your report quotes from around the world suggest similar approaches to this challenge.

Urban and peri urban localities will derive the most benefit (to congestion) if a mode-shift from single occupancy cars can be achieved. However often the geography or form of these conurbations does not lend itself to scaled segregated spaces – unless the area restricts access by other modes. The ideal solution would be to have comprehensive networks of cycle/micro vehicle routes across a place. However, this can be challenging and land demanding to achieve. This transport challenge should be kept in mind during planning for any new developments, such as Garden Village schemes.

COVID-19 has brought forward e-scooter trials and consideration is needed to ensure that these are implemented properly, and that formal evaluation is put in place. The best trail approach may be to adopt no or low-car access where appropriate to for all micro vehicles alongside footways for walking. This may then be supported by the approach to road space during the covid-19 period, and it may be sensible for the law to permit local authorities in allowing micro vehicles through traffic regulation orders on routes they see as suitable.

Furthermore, any decisions should not be made in isolation to the use of roads. Our infrastructure may see a change in use over the coming years, whether it's more shared transit or an increase in EVs / CAVs, the road network will remain important and will need to remain efficient and reliable. Almost all journeys start and finish on local roads, providing a consolidation point between stations, park-and-rides, or other destinations. Roads fundamentally play a major part in everyone's life. Whether as a pedestrian, cyclist, bus passenger, driver or freight operator - we all rely on a well-functioning road network to access jobs, education, leisure, goods and services. Investing in our roads is vital in providing a sustainable, multi-modal transport system.

Questions 2.3 & 2.4 - In your opinion, which of the following micromobility vehicles should be permitted, if any, on roads, lower speed roads, and/or cycle lanes and cycle tracks?

The ideal solution will differ from place to place. However, TfN recognise the need to set clear, safe and innovative regulations to provide a framework for this. Some micromobility vehicles should be permitted on the road, by applying existing guidance for cycles/eBikes where suitable. Roads often have a better surface condition than footpaths, as well as being gritted in the winter months. The utilisation of road space will also avoid conflict with pedestrians. As above, the road surface is an important factor, as potholes represent hazards for users of such vehicles, and if not avoided could result in personal injury and damage to the vehicle.

In line with the Government's Principle 6 (*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*), we should not lose sight of impacts and benefits for freight transportation. As legal frameworks change, we should ensure existing methods such as cargo bikes or

new innovative micromobility solutions are supported and considered within the user mix. We suggest that large e-bike(s) and powered trailers could be used on all roads excluding Motorways/dual carriageways. This would support a shift towards low emissions freight and support a mode which isn't suitable for cycle lanes or pedestrian walkways. There is evidence that these larger forms of vehicle can operate safely and effectively in Low or Zero Emission Zones at minimal cost to consumers and business. For larger (emerging) powered delivery vehicles, guidelines should be developed as the highway/road is the only viable place for use.

Similarly, electric skateboards/uni-wheel/hover boards can pose significant safety issues for other active travel modes due to issues with user competence and technological limitations (braking etc.), but may not be suitable for roads either. They should use cycle paths and tracks were possible. Although care needs to be given towards the safety of other cycle path and track users – particularly children and less confident users.

Micromobility should not be at the expense of active travel – care should be given in considering any of these modes for use on walkways.

Question 2.8 - In your opinion, what should the requirements be for micromobility users?

We agree that regulation should be proportionate to the risk, however we would note that not all micromobility options are of a lighter and slower composition. Regulation, maintenance checks and training would likely be required to ensure proper use and application, in line with EAPC requirements currently. In other areas, regulations should go further:
- Suggest a minimum age of 16 as seen in Barcelona. This is further to the EAPC which states 14 years of age.
- Speed limits should be regulated by design speed to 12.5 mph.
- No taxation should be required to encourage uptake.
- Sufficient training and licences should be considered for some modes.
- But we would stress that these measures require testing in the real world to form an evidence base to support final regulation decisions.

Buses, taxis and private hire vehicles

Transport for the North's Local Authority partners manage and invest in local transport networks within their economic clusters, and this includes working with Operators to deliver bus services. We note that the Bus Services Act 2017 potentially gives local authorities new powers through partnerships or franchising to regulate buses in their area, and this has potential to deliver transport services to the customer suitable for a particular location.

Whilst bus services are clearly the responsibility of our local partners, TfN's Strategic Transport Plan set out the importance of a multi-modal approach across the region, '*It is important that the North's transport network delivers a future mobility which is right for the customer. People should be able to have a seamless travel experience, including improved ticketing and better journey information. Currently, integration is poor and information and ticketing systems are fragmented and complex. This improved travel experience must be made not just on pan-Northern routes, but also at a local level, including on light rail, rapid*

transit and buses.' Importantly, bus services can provide additional connectivity and capacity without increasing the number of vehicles on the road network.

The main challenge for any shared transit option is its attractiveness and commercial viability when compared to the private vehicle. The Government's Decarbonisation Transport Setting the Challenge rightly sets out how accelerating modal shift to public and active transport can help reduce emissions from transport. However, this will likely require a combination of public confidence, enjoyment of the shared services provided and demand measures suitable to the local area in question. Examples are emerging which provides confidence that these solutions can be a successful part of the mix.

The call for evidence notes the success of flexible bus services such as Arriva Click in providing a new innovative solution within Liverpool and Leicester. 40% of the customers using the Liverpool service have switched from single occupancy cars or taxis, indicating a clear modal shift. These projects provide useful lessons learned which should be easily transferrable to other urban areas around the UK. It also provides an opportunity to test these types of services in more rural areas to understand whether similar benefits can be recognised. The rural bus service is fundamentally important to many rural and even semi-urban areas around the North, and the wider UK. Without this lifeline connectivity, we risk large scale social isolation or a dependency on car as the only method of transport. That is why we agree to Question 3.10 and the use of flexible bus services as part of the solution, but this should not be at the expense of reliability and effectiveness of the whole bus service provided to the people within these communities.

In answer to Question 3.12b, the role of the local road network cannot be forgotten, particularly the issue of the ongoing maintenance of the network, which also serves buses, rapid transit, cycling and walking. Whilst some of TfN's work is focussed on new strategic interventions, specifically on the Major Road Network, one of the objectives of the Strategic Transport Plan is to increase the reliability and resilience of the transport system as a whole. It is critical to ensure that ongoing funding for local road maintenance and asset management, as well as maintaining and renewing local public transport system, reflects the real needs of such networks. Our Strategic Transport Plan included plans for the road network which is integrated with our plans for rail and smart ticketing to transform the way people travel in the North.

Furthermore, strategic rail-based park and ride also remains a relatively untapped market across the North. As major rail interventions such as Northern Powerhouse Rail are developed, understanding the opportunities for strategic park and ride to reduce overall levels of car mileage and volumes of traffic entering urban areas will be important. Through consideration of micro-mobility options when calculating journey times, some new stations or strategic rail developments could perform better in business cases. This is as stations are accessible in quicker times due to micro mobility reducing the overall journey-time.

Flexible bus services have faced issues relating to the lack of commercial viability. Successful schemes will often require proportionally significant high 'up front' funding, and a sufficient volume of regular users for them to be financially

viable in the longer term. This may be difficult in areas where alternative conventional public transport provision or access to convenient private transport is reasonably high. The current regulations requiring services to be pre-booked are onerous, as is the requirement for services to operate in a limited geographical area. We would suggest these regulations should be reviewed to remove some of the barriers to longer term viability.

TfN suggest flexible bus service schemes are designed with an understanding of local needs, to harness opportunities for service take-up. Consideration needs to be given on how conventional public transport services in some areas can operate alongside flexible bus service options, so as not to dilute remaining use. Flexible bus service options might be an effective option in the short and medium term following the impact of Covid -19 on public transport use.

7. Response to Part 3 - Mobility as a Service

TfN consider this to be a key enabler in encouraging individuals to choose more sustainable travel options. MaaS can play an important role in the future mix of our transport options, and place the user at the heart of the transport network. TfN encourage a multi-modal approach to the connectivity of the customer in the future, and MaaS can help to facilitate a shift from separate modal journeys to 'one journey'. However, to date, MaaS has not developed as quickly as it could have and can be complicated by piecemeal approaches and complex regulations.

There are examples of European cities which had been developing into Mobility as a Service (MaaS) markets pre-covid19. In such cases, there was a shift to commuters viewing public transport as a safe alternative to private transport, with a flexible and dynamic range of modes across one platform. However, the onset of Covid-19 means that MaaS, and particularly the aspiration for increased shared transit, will need to evolve too if this trend is to continue.

We would like to see a clearer definition of roles and responsibilities in the development of MaaS. Government should lead on the understanding and communication of what 'good MaaS' looks like, and steer it in the correct direction to ensure optimisation that meets the needs of the consumer. MaaS needs a clear Government mandate, without being overlay regulated. Most importantly, this requires an outcome-based approach to delivery in order to navigate what can be innovative changes to a complex system.

Local authorities and STBs have a vital supporting role to government in the development and mass implementation of MaaS, providing advice and guidance to ensure that the development and day to day operation of services is optimised for their local area. One of the key aspects of the Local Authorities and STBs role would be in determining the specification of the optimum network for their area, identifying best practice and working across regional boundaries. Local Authorities and STBs know their areas and are well placed to leverage additionally from such programmes – potentially accelerating the deployment and mass role out of these Future Transport solutions. This should include those solutions which may be provided by smaller localised providers. This would require new funding models, which could include Central government or the ability for local revenue generation, and would see local operator groups as beneficiaries, as well as seeing increased patronage.

In terms of ensuring active travel is considered as part of MaaS. This will need to come from either communication of the carbon emissions per mode to allow an informed choice, or for Government to go further and explore carbon fiscal policies. By including a cost on carbon, the market would see a faster shift to EV, ULEV or active travel as a first choice of mode.

i.   _Enabling trials of new modes_

Question 5b.1 - In your opinion, which specific areas of road traffic law might benefit from having a statutory exemption power included to help support safe trials of transport technologies? Why have you suggested these areas?

Question 5b.2 - In managing the risks of allowing exemptions to transport legislation for trials, what do you believe should be the role of:
● *Local authorities?*
● *Combined authorities or the Greater London Authority?*
● *National government?*
● *Trialling organisations?*
● *Other?*

TfN welcome the intention for a series of trials, both regulatory and physical – to help prove the commercial case for innovations, but also to identify that each one can deliver the social, economic and environmental benefits sought and manage risks we want to avoid. Travel patterns are diverse and often extend across local authority boundaries.

Based on TfN's evidence building to date, there is some support for TfN to consider the support of trials. This is something we will explore further with our partners. In the first instance we would suggest Local Authorities are provided with sufficient backing and robust legal frameworks (responsibilities and powers) to enable pilots and trails. Funding mechanisms (new or existing) will also need to be in place to adequately deliver trails and ensure effective delivery and implementation.

TfN will consider what role it can play in supporting this. We are aware that other STBs are suggesting STBs should have the power (concurrent with local transport/highway authorities) to declare 'trial areas'. Experience from covid-19 suggests that doing things at scale and at pace can effect change in ways that we have often aspired to but never achieved – STBs operate at scale, and by working with our partners can be a driver for innovation. **We are willing to work with the Government and other STBs, informed by our own Local Authority partners, to better understand the merits of such an option.**

ii.   _Commercial sensitivity and deliverability for Future Transport solutions_

Question 4.4 - What competition concerns do you think Mobility as a Service might present that could be difficult to address through existing regulations?

Question 4.5 - In your opinion, does the current framework for consumer protection need to be expanded to include liability for multi-modal journeys? If yes, please provide evidence.

A careful balance is needed between consumer protection and commercial competition. It is important that innovation is not stifled by over regulation but conversely it is important to protect consumer needs. This is well developed in

the rail sector, e.g. delay repay. Clarity is needed on how this will work within MaaS platforms. Furthermore, liability for each end-to-end journey should be assigned to the MaaS provider selling the ticket, as consumers are unlikely to continue using the service after a poor experience complicated by having to deal with several different providers. Focus should be on how the consumer has an easy way to get access to information on travel choices and then make a payment. Therefore Government may want to consider looking at consumer legislation/regulation as opposed to solely transport regulation.

MaaS must be accessible to all demographic groups in the population, but existing regulations mean that it is likely to present a number of accessibility and inclusivity concerns. One of the biggest barriers to rollout of integrated ticketing remains the co-operation and transparency required from commercial operators. There are a number of competition concerns that MaaS may present that could be difficult to address through existing regulations. Mobility as a Service may cause inequality in the market where either a leading MaaS provider or group of providers favours a partnership with a specific transport provider(s) based on commercial considerations rather than seeking to offer the best solution or widest range of choice for the consumer. It is likely that unregulated competition will lead to many MaaS solutions either having a limited selection of providers or have a bias to one or more providers. On these occasions the consumer is unlikely to get the optimum combination of travel solution based on their needs, and in turn there will be less use of sustainable modes (or something below the maximum use if the best possible MaaS solution was in place).

Consideration is required towards adequate provision and separate regulatory protection in relation to higher costs of entry likely to be incurred by smaller organisations.

iii.   *Digital infrastructure to support Future Transport and MaaS*

TfN support the Governments principle '*Data from new mobility services must be shared where appropriate to improve choice and the operation of the transport system'.*

Initial TfN partner responses indicate that collecting network data across the North that all members could access would be useful. This might be something that members and the business community could access to inform the deployment of new technology or transport solutions in their area. TfN may also be able to lead conversations with operators at regional level to stress the importance of data sharing, which may ease some of the pressures local authorities encounter when requesting it locally (Table 1, recommendation 11).

Similarly, we have seen support towards on Pan northern data platform with open data capabilities (Table 1, recommendation 18)

Having adequate digital infrastructure in place to support innovation is key for Future Transport in a few ways:

- o Data standards are vital to enable the interoperability for ticket selling including standards for tap data. The provision of data standards for journey planning purposes are broadly available or are coming in to play over the coming years.

- o This interoperability is critical to MaaS in real time service provision, but also in terms of analysis, forecasting, and modelling new services and infrastructure. The complex relationships between different mobility services can only be understood by modelling their integration. Externalities, such as air quality, land value, and congestion can also be better understood.
- o Due to the variety of geographies from each MaaS service providers, it is important that these data sources are interoperable to enable analysis at the maximum range of geographies for analysis and modelling purposes.
- o Standardised inputs to analytical models will enable more comparable outputs between different geographies, and MaaS solutions. This will mean that MaaS business cases are easier to compare. It will also allow for the standardisation and re-use of these models, leading to efficiencies.

Examples of TfN activity towards data to date:

Bus Open Data Digital Service

TfN is an active member of the industry round-table for DfT's Bus Open Data Digital Service, alongside bus operators, leading journey planning app providers, other mobility information companies and open data experts. Government will legislate the open publication of new data sets – including timetables, vehicle location and fares.

Fares Data Build Tool

We are building a Fares Data Build Tool which will help operators publish fares in the required NeTEx data exchange standard. Will be free to use for bus operators and LTAs. Being delivered as part of phase 2 IST programme. Will be available via both the DfT's Bus Open Data Service and TfN's regional Open Data Hub.

This a good example of collaborative partner working between DfT and TfN, and we would be open to discussing with Government how this might be applied as a use case to deliver other aspects related to Future Transport. This may provide opportunities for Government to test policy and legislation through TfN as a delivery agent, before rolling out as national solutions.

Integrated Smart Ticketing

As MaaS apps and platforms continue to develop, it is intended that travel is easier and more accessible. For local journeys, users should be able to Pay as you Go, with the reassurance that they will be charged the best fare and not be penalised for multi-mode journeys. The development of open data portals and shared back offices for rail, enables the operator to share information and gain a greater understanding of the users and travel. Through gaining additional information and data about users, this can assist transport operators and planners to continually build on their understanding and act on this information in a more. MaaS ticketing and data platforms are key to delivering this.

As of 2020, the Integrated Smart Ticketing programme contains four phases:

- **Phase 1:** Implementing smartcards for rail travel in the North, including seasons and flexi tickets.

- **Phase 2:** Providing better quality information to customers using open source data.
- **Phase 3:** Developing an account-based travel solution to deliver contactless pay-as-you-go travel on rail.
- **Phase 4:** Supporting our transport authority partners to deliver localised smart travel schemes across bus, trams and ferry.

8. Response to non-regulatory measures

- *Question 5c.4 - In your opinion, could any non-regulatory measures help to empower local authorities, combined authorities or the Greater London Authority to manage transport innovation? Please provide examples.*

- *Question 4.10 - Do you think guidance or a Code of Practice for the Mobility as a Service industry would be useful? If so, what content do you believe would be beneficial to include in a Code of Practice?*

We have outlined a number of non-regulatory options to support and manage the delivery of the Future Transport principles (see Table 1). We would welcome our local partners views in shaping these questions. We would note that, to date, due to the range of players and bodies involved, the innovation landscape is often difficult to navigate and achieve successful results which can reach implementation stage and be rolled out on mass. Increasing co-ordinated and collaborating approaches may tackle current barriers (both sectoral and organisational) and enable more integration of knowledge and solutions.

Codes of Practice are by nature guidance, and not enshrined in law through regulations. However, these can be useful mechanisms to set out guidance and standards to support the uptake and adherence to any Future Transport regulations. This may be particularly of use in pointing to best practice of businesses and employers, to provide frameworks for how they may provide necessary support for employees as Future Transport uses increase in the future.

TfN are open to supporting further identification of the suitable breakdown of regulations and non-regulatory options as this conversation develops.