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Department for Transport

**National road and rail networks: draft  
national policy statement**

Consultation response

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## Introduction

- 1.1. The Passenger Transport Executive Group (**pteg**) represents the six Passenger Transport Executives (PTEs) – strategic transport bodies which between them serve more than eleven million people in Greater Manchester (Transport for Greater Manchester), Merseyside (Merseytravel), South Yorkshire (SYPTe), Tyne and Wear (Nexus), the West Midlands (Centro) and West Yorkshire (Metro). We are also a wider professional network for Britain's largest urban transport authorities. This response represents the views of the six PTEs only.
- 1.2. We welcome this opportunity to comment on the draft national policy statement on national road and rail networks. These networks play a crucial role in supporting economic growth by enabling the efficient movement of people and goods.

### **Q1: Does the draft NN NPS clearly establish the need for development of the national networks? If not why not?**

- 1.3. The NN NPS clearly sets out the capacity pressures on the existing network which, if unaddressed, will constrain travel and economic growth. The forecast 'do nothing' cost of congestion on our strategic road network of £8.6 billion per annum by 2040 is an alarming statistic. It is particularly alarming given the capacity pressures on the national rail network, to which High Speed Rail will only form part of the solution.
- 1.4. The NN NPS is less clear in providing guidance on the priorities for investment and areas of concern. As identified in annexes A and B, there are areas of severe congestion, particularly in urban commuting areas. Addressing and mitigating this urban congestion should be the focus for investment as doing so will enable national networks to run more smoothly. The Secretary of State should favour schemes to tackle congestion and capacity/ constraint issues at the point of most urgent need first, which should generally focus on urban areas for both road and rail.
- 1.5. Within the draft NN NPS, the rationale for developing road links, as opposed to rail and vice versa is not explicitly stated. We acknowledge that there are situations where a major road project is the only solution, but often the balance of benefits between modes is more nuanced.
- 1.6. It is widely acknowledged that Britain's railways are experiencing the highest levels of growth for both passengers and freight for decades, particularly on major city commuter routes. The rail network has the ability to carry more passengers and freight more efficiently (and with fewer carbon emissions) than road. The average freight train, for example, can take 60 lorry journeys off the road and can travel almost three times further on the same amount of fuel. A four carriage passenger train can carry the same amount of people as 300 cars. The government should prioritise the implementation of rail-based solutions wherever possible and an inbuilt presumption in favour of rail schemes would make the NPS process more effective in delivering the government's wider transport objectives and a 'total network approach'.
- 1.7. Within the rail network, particular priority should be given to congested urban rail (commuter rail) as opposed to less congested inter-urban rail (long distance). The National Forecasts for rail and traffic growth do not truly reflect growth in demand at the regional or sub-regional level, particularly in the major urban areas which have the greatest potential for future economic development. Whilst inter-urban "centre to centre" rail is vital for the UK (hence the

importance of HS2 being delivered) high priority must also be given to the urban rail commuter routes which connect people to jobs and support the economic growth predicted.

- 1.8. We also note in the NN NPS that when looking at passenger rail capacity outside of the key London flows, many important strategic commuter urban flows are provided by four or five coach units (or less) thereby not utilising current infrastructure to its full potential. The document, particularly under 2.23, should acknowledge that improving capacity, capability, reliability and operational performance can only be achieved by an extensive roll out programme of infrastructure enhancements, including rolling stock expansion and rail electrification as well as selective gauge enhancements in some instances. Whilst the environmental and other benefits of rail electrification are recognised, the statement appears to stop short of a commitment to delivering widespread electrification of the national rail network.
- 1.9. Finally the NPS should emphasise the need for networks to improve their resilience against climate change, particularly as more extreme weather conditions are now possible, brought into focus by recent flooding events on the rail network.

## **Q2: Does the draft NN NPS adequately explain the Government's policy for addressing the need set out in the NN NPS? If not why not?**

- 1.10. A key concern for *pteg* is the impact that enhancements to the national network may have on the local area and how these support and impact on wider connectivity and growth ambitions.
- 1.11. On rail, the NN NPS gives insufficient consideration of how HS2 is envisaged to connect to the existing rail network. While HS2 will provide significant new capacity to parts of the rail network, it does not negate the need for further local capacity improvements. Centro, together with Merseytravel, have devised a rail connectivity package which explores how the existing network in these metropolitan areas will access and integrate with HS2, as well as free up capacity on the West Coast Mainline.
- 1.12. On road, the NN NPS should take greater account of the fact that the majority of trips using the national road network start, end or travel through the largest urban areas – trips do not stop at the motorway junction. This means motorway traffic relies heavily on local road networks where congestion levels can quickly rise.
- 1.13. Although it does make sense to invest in bottlenecks on the strategic road network, large scale spending on motorways which fails to take into account the urban constraints on transport networks is likely to be poor value for money. Spending is therefore better targeted at ensuring that the existing infrastructure runs smoothly.
- 1.14. The NN NPS should consider, for example, targeting problems experienced at key junctions between the national and local road networks and allowing for hop-on/hop-off movements for local commuters (ideally linked to strategic park and ride sites).
- 1.15. Public transport, walking and cycling also have a key role to play in ensuring the wider transport network runs smoothly – a role that deserves greater recognition in the NN NPS. In major urban areas, encouraging more people to walk, cycle and use public transport for shorter journeys can reduce congestion on urban roads and thereby improve the reliability of the wider national road network. This requires significant investment in sustainable modes in order to provide an attractive alternative to car travel and encourage modal shift. Taking a

‘total network’ approach to investment would allow mitigating measures to be developed alongside national road network schemes.

- 1.16. Alongside modal shift, greater attention should be given to reducing the need to travel. The NN NPS somewhat plays down the potential of trends in areas such as information technology and agile working. In the long term we see great opportunity for these advances to change travel behaviour and the way that business is conducted. Encouraging such behavioural change should complement investment in our national networks.
- 1.17. Another key consideration for the future is the kinds of vehicles we will be driving and how they will be fuelled. The NN NPS neglects to discuss in any detail the potential contribution of ultra low emission vehicles and the provision of refuelling infrastructure for these on the national road network. Without refuelling infrastructure, the development and take-up of these new technologies will be impaired. It is vital that this policy clearly identifies suitable locations for such infrastructure.
- 1.18. On freight, we would like to see the NN NPS take steps to promote a greater shift from road to rail and water freight and identify spatially where freight generators and Strategic Rail Freight Interchanges (SRFIs) should be located. The growth of northern ports, such as the Liverpool SuperPort, could result in a step change in freight traffic flows which must be planned for and may require new SRFIs across the Midlands and the North.
- 1.19. Focusing on rail freight, sufficient capacity needs to be provided on the network to accommodate existing levels of freight traffic and to accommodate forecast future growth. A proportion of the capacity released by migration of passengers onto HS2, for example, could be allocated to enable more rail freight to travel on major north-south routes. Further electrification of the rail network could also open up capacity – passenger trains will be able to travel faster, freeing up more space in the timetable for freight traffic.
- 1.20. For these, and other major rail projects, the potential to undertake simultaneous improvements to support rail freight (e.g. gauge enhancements or passing loops) should be identified as an integral part of the planning process.
- 1.21. SRFIs are vital in encouraging freight modal shift from road to rail. The implication of the Government policy is that the development of SRFIs and the development of the rail freight network are independent of each other. This will mean opportunities for mode shift will be very limited because interchanges may not be approved if the network cannot accommodate the traffic, and the improvements to the network may not be justified without the SRFI. To achieve the desired level of mode shift to rail freight, there needs to be a more integrated approach, with Government policy providing a commitment to increasing the capacity of the strategic rail freight network and identifying suitable sites for SRFIs nationally to kick-start development.
- 1.22. On road freight, the growth in Light Goods Vehicle (LGV) traffic is underplayed in the draft NN NPS. LGVs form a significant part of overall traffic growth and further consideration of the generators of such delivery and servicing activity, and measures to mitigate any negative impacts would be welcomed.
- 1.23. Finally, the allocation of land for long-term or overnight parking, particularly for HGVs, should be considered. A lack of service stations, lorry parks and other safe, convenient and well-priced locations can place stress on the urban fringe.

### **Q3. Do the Assessment Principles provide adequate guidance to the Secretary of State on how he should assess applications for developments of the national networks? If not why not?**

- 1.24. More consideration should be given within the NN NPS to the impact of changes to national networks on local transport and economic agendas. This should include a commentary on (a) how the Local Transport Plans will be considered in decisions concerning the national networks and how national schemes should support LTP policies, and (b) how the national networks should support the implementation of the emerging Strategic Economic Plans (SEPs). Many SEPs include enhancements to links between UK cities to improve access to markets and support more efficient growth. The NN NPS should therefore clearly set out how national networks will respond to the SEPs, and how these will be considered as part of the decision making process.
- 1.25. We would welcome reference to the opportunities surrounding co-funding/prioritising enhancements with Local Transport Authorities and the Highways Agency on measures that deliver enhanced integration between the local and strategic network.
- 1.26. For any project likely to have significant transport implications for metropolitan areas, the applicant should not only consult the Highways Agency and/or the relevant highway authority but also the relevant PTE. PTEs should be named as statutory consultees to support the assessment process and applicants should be encouraged to begin pre-application discussions with PTEs as early as possible. Such early discussions would help to ensure integration of national schemes with local transport networks and enable planning to mitigate any adverse effects. Early involvement of PTEs in the assessment process could ensure that appropriate requirements are attached to development consent and/or planning obligations entered into.

### **Q4. Does the draft NN NPS give appropriate guidance to scheme promoters? If not why not?**

- 1.27. The guidance is comprehensive and based on the application of WebTAG, which is welcome. This allows for a robust and standardised assessment of scheme benefits and the need for a robust Environmental Impact Assessment in line with the EU directive. This also aligns with the Local Transport Body approach to regional investment, which is founded on WebTAG assessment principles.
- 1.28. The policy should encourage scheme promoters to collaborate on modelling/evidence/data with PTEs/ITAs and Highway Authorities and to consider funding for local road improvements, where a case can be made to strengthen the resilience of motorway diversionary routes on local roads.

### **Q5. Does the draft NN NPS consider all of the significant potential impacts of national network development? If not, what other impacts should be included and why?**

- 1.29. As discussed above, the potential impacts on local transport networks of national network development should be carefully considered.

- 1.30. The NN NPS should also clarify what scheme types the assessment principles apply to and potentially introduce some thresholds (e.g. scheme cost) to determine the level of assessment expected. There is a danger that applying all assessment principles to relatively minor enhancements risks schemes not being delivered. However, the full range of assessment principles would seem appropriate for large new build schemes.

### **Q6. Does the draft NN NPS give appropriate guidance on appropriate mitigation measures? If not why not?**

- 1.31. As discussed above, national networks do not operate in isolation. The NN NPS should place a much greater emphasis on the need for integration between national and local networks, including integration with public transport, walking and cycling.
- 1.32. Furthermore, in order to minimise capacity issues and avoid placing further pressure on national networks, there needs to be stronger linkages with local policy makers and development plans to ensure that new developments (whether housing, retail, employment) are located ideally in areas where there is sufficient capacity on the existing transport network and if not, that developers are asked to contribute financially towards necessary improvements to transport networks.

### **Q7. Do you have any comments on the Appraisal of Sustainability of the NN NPS?**

- 1.33. No. the Appraisal of Sustainability is considered to be fully comprehensive.

### **Q8. Do you have any comments on the Appropriate Assessment on the draft NN NPS?**

- 1.34. No. The Appropriate Assessment is considered to be fully comprehensive and in alignment with the Habitats Regulations.