

# TravelWatch NORTHWEST

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National Networks National Policy Statement Consultation  
 Zone 3/23  
 Department for Transport  
 33 Horseferry Road  
 London  
 SW1P 4DR

House of Commons Transport Committee  
 7<sup>th</sup> Floor  
 14 Tothill Street  
 House of Commons  
 London SW1H 9NB

25<sup>th</sup> February 2014

Dear Sir/Madam,

## **Draft National Policy Statement for the National Road and Rail Networks**

### ***1. Introduction and Scope***

1.1 TravelWatch NorthWest (TWNW) is an independent Community Interest Company representing all public transport users in NW England. We are pleased to give our views as follows on the above statement. The questions to which both consultations seek answers, whilst not identical, are nevertheless equivalent and very closely related.

1.2 It is regrettable but understandable that the consultation specifically excludes HS2. An examination of both the similarities and differences between planning for rail <sup>1</sup> infrastructures and for road <sup>2</sup> infrastructure could have been helpful.

1.3 TWNW has broadly welcomed, but with some significant caveats <sup>3</sup>, the proposal to make the **Highways Agency** a State Owned Company subject, like Network Rail, to High Level Output Measures. We believe some peripheral issues like the proposed expansion (to additionally embrace road infrastructure) of the regulatory role of the **Office of the Rail Regulator** (ORR) and some possible unintended conflicts of passengers' and motorists'

<sup>1</sup> Transport and Works Act 1992

<sup>2</sup> Planning Act 2008

<sup>3</sup> "Roads for Reform" December 2013 [www.travelwatch-northwest.org.uk](http://www.travelwatch-northwest.org.uk)

interests, are sufficiently relevant to deserve flagging in response to this consultation

## **2. Need for an NPS <sup>4</sup>**

2.1 We agree with the consultation's premises that "Transport is an engine of growth" and that planning for connectivity of the National Road and Rail networks is vital. <sup>5</sup> An NPS on the UK's National Network can take a more holistic view than separate NPS's for road and rail and in the process could encourage inter modal working.

2.2 However we are not convinced that the draft NPS fully meets current and future needs <sup>6</sup>.

2.3 It ignores the findings of the Standing Advisory Committee on Trunk Roads Assessment <sup>7</sup> that there is no automatic connection between new roads and economic growth. New roads "can work in two directions" and may as easily drain investment from either end. We are led to thinking that the only long term solution will be the introduction at some stage of **road user charging**. <sup>8</sup>

2.4 **Demand management** and making better use of existing networks needs to be incorporated in the draft NPS, especially in the light of recent studies showing traffic growth declining and in some cases actually stopping or "flattening". "Peak Car", oil prices and population/demographic changes are further untested hypotheses which need to be factored in. We cannot just continue to "build ourselves out" of congestion <sup>9</sup>, and we suggest that the NPS should encourage planning for demand management measures and better utilisation of what we already have, for example by encouraging measures to favourably alter **modal shift**. <sup>10</sup> Sections 2.22 and 2.24 appear to us to endorse failed **Predict and Provide** policies.

## **3. More contentious issues.**

3.1 There are other aspects of the NPS with which we cannot fully agree.

- There is no quantifiable threshold for what constitutes "**nationally significant**" **infrastructure** in the draft NPS <sup>11</sup>.
- With the expansion of the NPS to cover not just significant National road and rail infrastructures, but also those connected with Ports and Airports, Energy and Waste, it will be necessary to revisit the statement's strategy to ensure that in every case it is still fit for purpose.

<sup>4</sup> initial paired consultation questions

<sup>5</sup> Edington 2006

<sup>6</sup> second paired consultation questions

<sup>7</sup> SACTRA 1996 and 2000 – there is no equivalent Rail Committee

<sup>8</sup> Rail operators already pay track access charges.

<sup>9</sup> known as "predict and provide"

<sup>10</sup> modal shift is briefly mentioned

<sup>11</sup> Nor does the Planning Act 2008 provide this!

- In a recent “**sustainability proofing**” exercise carried out by one of our Board Members <sup>12</sup>, only 6 out of 13 assessment criteria scored environmentally positive, so it would seem reasonable for the NPS to **require planning inspectors to demand evidence of mitigating factors.**

#### 4. Guidance on assessment <sup>13</sup>

4.1 We agree the draft contains clear guidance. As passenger representatives we have no remit to comment on most of the criteria listed, the exceptions being some of the wider government policies relating to economic, social, environmental, safety, pollution and decarbonisation matters. Although we do have particular issues with some of these they generally fall outside this consultation’s terms of reference, or the questions on which it seeks opinions and answers.

#### 5. Provision of explanations.

5.1 Likewise we accept that the draft explains <sup>14</sup> (largely by reference to the above factors) the **Secretary of State’s (SS) likely approach to nationally significant road and rail infrastructure projects.**

5.2 What we do, however, find difficult to understand is the proposed changes to the **2008 Planning legislation** which leave the SS taking the **final decision** <sup>15</sup> on proposed nationally significant infrastructure projects. Despite this having to undergo consultation and Parliamentary Scrutiny it does appear to contradict the government’s commitment to **Localism.**

5.3 The proposed takeover of the Infrastructure Planning Commission’s role <sup>16</sup> (in respect of road and rail projects) by a new “examining authority” in the guise of a **restructured Planning Inspectorate** with an expanded remit to cover nationally significant transport, and additionally energy and waste infrastructure may well, as claimed, speed the planning process.

5.4 However we would suggest that the consequential replacement of the established “**examination in chief**” by a paper based procedure might eventually be regretted.

#### 6. Wider context

6.1 In our earlier response to the **National Planning Policy Framework** <sup>17</sup> (NPPF) we commented on how the demise of Planning Policy Guidance 13 potentially endangered the by then well understood links between Transport Planning and Land Use Planning.

<sup>12</sup> North West Transport Activists Roundtable

<sup>13</sup> third paired consultation questions

<sup>14</sup> final paired consultation questions

<sup>15</sup> which would not then be open to debate at Public Inquiry

<sup>16</sup> Planning Act 2008

<sup>17</sup> TWNW Nov 2011

6.2 We are pleased to see that the NPS's wider remit as a Planning Policy Document has enabled it to now revisit some of these links. Our comments on this wider remit follow.

- We agree that there is a need to unlock **sustainable Regional development** and prosperity and to cater for the transport and land use needs of an expanding (and ageing) population, but this should be seen in the context of balancing other Social and Environmental imperatives.
- The statement that “*without development the National Network will constrain economic growth*” should therefore be qualified by reference to also promoting its better utilisation.
- The **ROAD NETWORK** :- The NPS's imperatives are to reduce congestion and unreliability. Whilst there is reference to a possible need for “some new alignments”, we see no mention of demand management, reducing the need to travel <sup>18</sup> or rebalancing the modal split between private and public passenger transport.
- The **RAIL NETWORK**:- The NPS, and ourselves, sees the imperatives here as capability to increase **reliability** and maximise **capacity**. Although it is deliberately (?) silent on HS2 there appears to be an emerging consensus that release of some capacity on the “classic” network will be paramount. Increased speed is desirable where this can be achieved. <sup>19</sup>
- **RAIL FREIGHT INTERCHANGES** :- Connectivity between road and rail national networks will be paramount, with economic and safety concerns also important. These massive warehouse “hubs” can generate huge amounts of freight traffic, often on greenfield sites. Not all will be rail connected - the NPS allows a “significant proportion” of rail connected warehouses in “appropriate locations”. We suggest that the words underlined should be quantified &/or defined.

## **7. Conclusion**

We trust our observations have been of use and we are prepared to expand on them if asked, either verbally or in writing.

Thank you for the opportunity to respond

Yours faithfully

*John A Moorhouse*

John Moorhouse, Company Secretary

**Response prepared by Paul Fawcett MPhil FCILT**

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<sup>18</sup> by the use of Communication and Information Technology

<sup>19</sup> e.g. HS2 (strictly excluded from this consultation!)