

DRAFT NATIONAL POLICY STATEMENT FOR NATIONAL NETWORKS – TfSHIoW
CONSULTATION RESPONSE

This Transport for South Hampshire Isle of Wight (TfSHIoW) response has focussed on the strategic transport and economic implications of the draft National Policy Statement and does not comment in detail on other non transport or economic issues (e.g. environmental impact).

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

Yes. Within the Solent area, many sections of the National Road and Rail Networks already suffer from congestion problems and this is likely to be exacerbated by future economic growth and proposed development. The Sub Regional Transport Model (SRTM), which provides a comprehensive transport evidence base for the Solent area has identified that economic growth would be constrained without investment in transport interventions.

THE NEED FOR DEVELOPMENT OF THE NATIONAL ROAD NETWORK

Importance of the national road network

The importance of the national road network to the UK economy is accepted and demonstrated in the NPS.

Drivers of need for development of the national road network

The National Transport Model is now predicting an increase in traffic flows on the Strategic Road Network (SRN) of 46% for the “central” forecast and 26% for the “low” forecast over the 2010 to 2040 30 year period.

Historically, traffic growth on the SRN and particularly the Motorway network, has exceeded the growth on the road network as a whole. For example, over the 1996 to 2011 15 year period, Motorway traffic increased by 27% (against a “central” forecast of 47% in the 1997 Forecasts), but on all roads, the increase was only around 11%. In contrast, urban ‘A’ roads saw little overall growth over this period, with traffic levels increasing to a slight peak in the early 2000s and then by 2012, declining to levels previously seen in the early to mid 1990s. Assuming there is a limited pot of funding available for transport TfSHIoW is concerned that future years funding allocations to strategic networks will be based on these forecasts and that this might be at the expense of funding to local authorities. . This is not to say that we do not agree with investing in national road networks rather that the balance in funding between local and national projects needs to be correct. With such high forecasts that have in the past proven to be incorrect there is a risk that Central Government may get the balance wrong.

In terms of the factors that will influence future traffic trends, the NPS has only noted evidence that could increase traffic demand and concluded that *the overall picture is one of continuing increased car use*, However, the NPS has not considered the full range of evidence available on this issue including:

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- the declining proportion of younger people under 30 that hold a driving licence, which is now lower in 2010 than it was in 1995/96 for both men and women;
- the evolving impact of new technology, which is generally embraced more by younger people and can be used freely when making public transport journeys, but not when travelling by car;
- The focus of population growth in and around existing urban areas, with greater scope for people to use public transport, walking and cycling; and
- The overall decline in car travel at an individual level since 1995/96 (7.1% for drivers, 11.3% for passengers).

In summary, historical evidence does show that levels of traffic growth on the SRN are generally in excess of other parts of the road network. Traffic growth is likely to occur at a higher level on the SRN as economic conditions improve, even if it remains low or relatively static on other parts of the network. However, previous evidence suggests that these levels of growth will be less than predicted, when looking over an extended period of time. Further research is required into the many factors influencing travel and traffic demand, to ensure the accuracy of future predictions.

Within the Solent area, the Sub Regional Transport Model (**SRTM**) is a useful tool to provide predictions in future demand on the SRN at a more local level, taking into account future travel demands created by economic growth and proposed developments.

Congestion and impact on economic growth

The impact of increased congestion on the economy and quality of life is accepted. The level of increase will depend on the issues discussed above.

THE NEED FOR DEVELOPMENT OF THE NATIONAL RAIL NETWORK

The Importance of the national rail network

The importance of the national rail network to the UK economy is accepted and demonstrated in the NPS.

Drivers of need for development of the national rail network

Rail traffic has increased significantly since the mid 1990s as evidenced in this section and at a far greater level proportionately than road traffic over the same period. This gives confidence that the predicted future levels of growth are realistic and concur that *there is a compelling case for the development of the national rail network*.

Q.2 Does the draft NN NPS adequately explain the Government policy for addressing the need set out in the NN NPS? If not why not?

National Road Network – Government’s policy for addressing need

- **Maintenance and asset management**
The principle of a well maintained and managed national road network is important and supported.

- **Demand management**

Within the Solent Area, there are a high proportion of short journeys on the SRN. For example, 30% of traffic on the M27 only travels between one and two junctions. Compared to other parts of the SRN elsewhere in the UK, there may be more scope for smarter choices or behavioural change programmes to encourage a proportion of these journeys to use other modes. This is important, as it would reduce congestion for longer distance strategic passenger and freight journeys on the SRN.

- **Modal Shift**

Whilst it is true that modal shift is possible for many journeys, in South Hampshire, a high proportion of journeys are relatively short and public transport, walking and cycling options are more readily available, compared to many areas. This does provide a greater scope for modal shift. The Solent area is already implementing the comprehensive "My Journey" behavioural change programme, which is funded through the Government's Local Sustainable Transport Fund, to delivery modal shift. In such areas local transport investment has a significant role to plan in taking the pressure of off the national road networks. The further support our argument that the balance between national and local funding is important and also that it varies geographically.

- **Conclusion on Alternatives**

Whilst the alternatives will not address all the *damaging effects of congestion*, in areas like the Solent, where they have greater scope to have an impact, they should be pursued in parallel with investment in the SRN to minimise the impact of future travel demands. This is particularly important in areas like the Solent, where the SRN is already congested and further development is proposed, which would have an impact on the SRN.

- **Government's Policy**

Whilst supporting the principle of the Government policy and welcoming the potential for investment to be made beyond the existing SRN boundary on the local road network, it is important that any improvements are made within a comprehensive approach, which considers access by all modes and the relevant Government agencies should work closely with the Local Transport Authorities to achieve this. Some specific issues to note are:

- Capacity improvement schemes should be targeted where there is a demonstrable need, particularly to support economic growth and address congestion issues, which are constraining economic growth;
- Alongside any capacity enhancements, opportunities should be taken to maximise the opportunity for modal shift and behavioural change to minimise the impact of increased travel demands on the SRN and increase network resilience. This is particularly important in urban areas like the Solent;
- Any network changes should fully consider their impact on all users and should aim to improve road safety and enhance facilities for public transport, walking and cycling. The general commitment to this approach in the NPS through

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delivering wider schemes is supported, but this approach should be applied to all schemes, which interface with the local road network.

TfSHIoW has built up a good working relationship with the Highways Agency and will continue to work closely with them as they develop their Route based Strategies for the SRN in the Solent area.

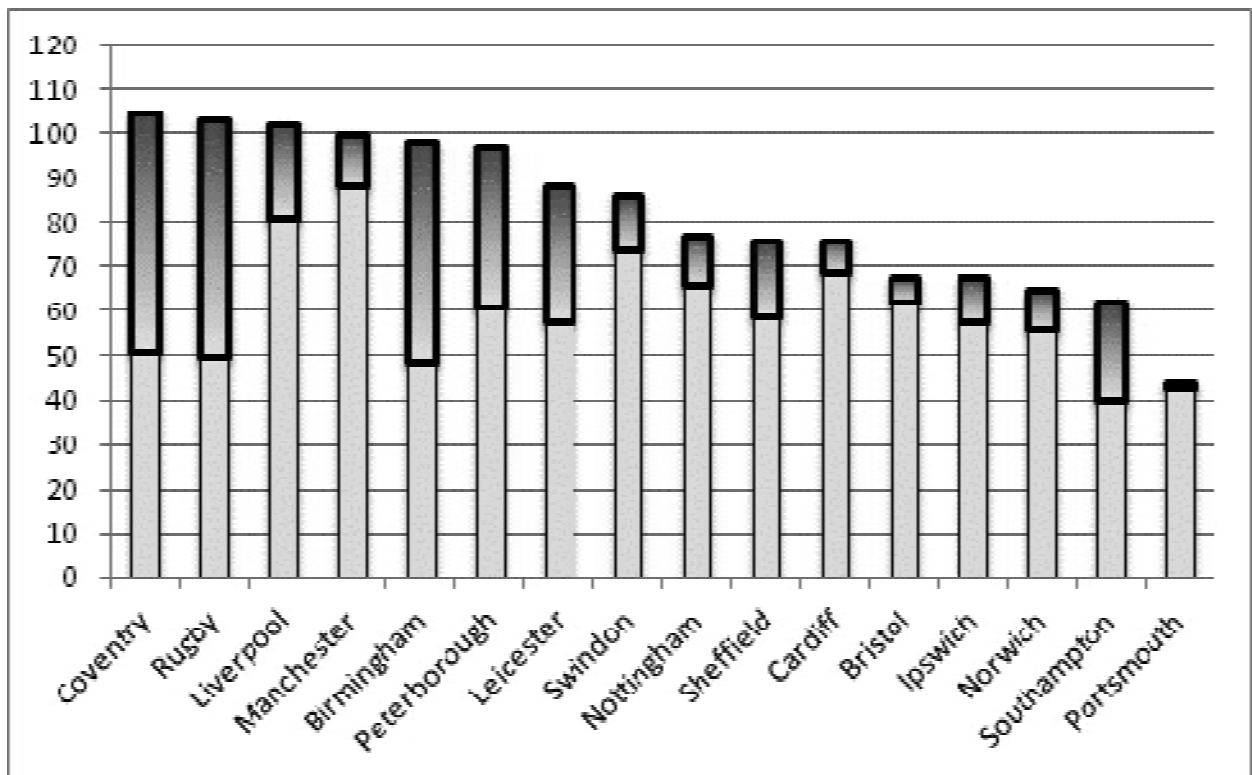
National Rail Network – Government’s Policy for Addressing Need

The general approach proposed by Government to address increased demand on the National Rail Network is supported. Rail has an important role to play in the Solent area, both for passenger and freight movements and ongoing investment in the network to address capacity issues is essential.

In terms of **passenger** movements, the key issues to be considered are:

- The capacity and journey time on routes from Southampton and Portsmouth to London;
- The need for improved east-west rail connectivity, which would:
 - Provide better accessibility between two cities;
 - Provide better accessibility into both cities from their Journey to Work areas; and
 - Provide better rail accessibility from the east to Southampton Airport.
- Developing a medium to longer term strategy for the Island Line

Table showing average journey speeds in MPH by rail



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The National rail network is not servicing the Solent area as well as it could. For the Solent area rail journey times to London are a barrier to interaction and trade with London. KPMG report for HS2: strong correlation between rail connectivity to businesses and productivity. Furthermore, increased journey times to London reduce productivity in the economy. SW rail study reported a 6% drop in productivity per 100 minutes from London. Despite being close to London in terms of distance, the Solent is **peripheral** in terms of journey times (Norwich, Coventry, Cardiff). Investment in HS2 will potentially further put the Solent region at a comparative disadvantage unless new rail investment are planned to decrease the journey times between London and Southampton, Portsmouth, Bournemouth and Pool.

In terms of **rail freight** movements, the key traffic generator in the Solent area is the nationally important **Port of Southampton**, where a significant proportion of container and automotive traffic already uses the rail network. A significant amount of investment has already been implemented or is committed to increase capacity for freight movements, but it is essential that on-going investment is made, as volumes of both container and automotive traffic is predicted to increase substantially in future years and it is important that an increasing proportion of this traffic travels by rail to relieve pressure on the SRN.

TfSHIoW has already built up a good working relationship with Network Rail and will continue to work closely with them through the Long Term Planning Process to identify investment requirements in the rail network serving the Solent area over the next 30 years.

The need for development of Strategic Rail Freight interchanges (SRFIs)

The principle and need to establish SRFIs is supported. Within the Solent area, there may be opportunities to tie in such a facility more directly with Port operations, particularly as the Port of Southampton is the second busiest container port in the UK.

Whilst supporting SRFIs, it is also important that smaller railfreight terminals are retained and protected, as they still have an important supplementary function to support various rail freight services, which would not be accommodated by SRFIs.

Q.3 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?

In principle, the **Assessment Principles** do provide adequate guidance and the principle of weighing up potential benefits against potential adverse impacts is a sound approach to decision making. In any case, the process for assessing many issues is defined on a well defined statutory basis (e.g. EIAs, Habitats Regulations),

Q.4 Does the draft NN NPS give appropriate guidance to scheme promoters? If not why not?

This section outlines a comprehensive range of issues, which scheme promoters would need to address. The principle of developing a detailed WebTAG compliant Transport Business Case for all schemes is supported.

Q.5 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?

The transport and economic impacts of each scheme will be considered through the Transport Business Case. It is important that where a National Network scheme has a transport impact on the local transport networks, the implications of this are fully considered and addressed.

Q.6 Does the draft NN NPS give appropriate guidance on appropriate mitigation measures? If not why not?

The majority of mitigation issues relate to non transport issues and TfSHIoW does not have any specific comments on these issues, other than to note that the NN NPS does appear to have comprehensively considered mitigation measures for a range of potential impacts.

This section does consider **Impacts on transport networks**, but only relating to Strategic Rail Freight Interchanges and construction sites for National Network schemes. The mitigation proposals noted in this section note the potential need for demand management, travel planning and the need to mitigate worsened accessibility, particularly for pedestrians and cyclists. TfSHIoW supports this approach. It is particularly important that mitigation addresses accessibility by all modes, including public transport.

Q.7 Do you have any comments on the Appraisal of Sustainability of the NN NPS?

The Appraisal of Sustainability has considered two alternatives to the NN NPS. The first of these reduces the level of investment in the road network, with increased investment in the rail network and alternative modes to the private car. The second alternative increased road investment at the expense of rail investment.

The assessment has shown that the overall impact of Alternative 1 is similar to the NN NPS, although Alternative 2 does have a greater negative impact on many issues and does not provide any economic benefits beyond the NN NPS. The NN NPS does however perform slightly better economically than Phase 1.

The Appraisal of Sustainability does therefore demonstrate that the NN NPS is providing a good balance between overall sustainability impacts and economic growth. However, in dense urban areas like the Solent, the approach outlined in Alternative 1 might be more appropriate in certain locations, where there are constraints to expanding the capacity of the SRN and the opportunity should be taken to accommodate increased travel demands through better use of the rail network and other alternative modes. More detailed work emerging through the Highways Agency Route Based Strategies and the Network Rail Long Term Planning Process. TfSHIoW is keen to take an active role in both these projects.

Q.8 Do you have any comments on the Appropriate Assessment on the draft NN NPS?

TfSHIoW does not have any specific comments to make on the Appropriate Assessment. Any specific scheme developed on the NPS within the Solent area, will be required to have due regard to the Habitats Regulation and mitigate against any issues that are identified through this process.

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Q.9 Please provide any further comments regarding any aspect of this consultation.

TfSHIoW has no further comments to make.