

Consultation on a Draft National Policy Statement for the National Road and Rail Network: Response by Greengauge 21

Greengauge 21 is a not for profit company established in 2006 to research and develop the concept of high speed rail as a national economic priority. In 2008 we established a Public Interest Group which has supported and funded a large part of Greengauge 21's work. This included *Fast Forward (2009)* which set out our strategy for high speed rail in Britain. In 2012, we established the High-Speed Rail Industry Leaders Group to bring together industry expertise to help ensure that Britain's high speed rail network is delivered successfully to world class standards.

The role and focus of Greengauge 21 is particularly on high speed rail. The relationship of high speed rail with the national road and rail networks and how they are developed – taking account of the capacity and connectivity that will be delivered by HS2 – is clearly extremely relevant in delivering a national transport network that supports long term needs and a prosperous economy in an efficient way. This is at the centre of our response.

Q1. Does the draft NN NPS clearly establish the need for development of the national networks? If not why not? (see Chapter 2 of the NN NPS)

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?

No (to both questions). We acknowledge that the NN NPS is planning policy guidance rather than a strategy. But there are a number of areas where we believe the NPS could provide clearer policy guidance to scheme promoters. Transport policy in Britain was informed and influenced by the Eddington Report (2006), commissioned by HM Treasury and the Department for Transport. It highlighted a number of issues in relation to the planning system which should be reflected, we suggest, in the NN NPS. In particular, Eddington highlighted that:

“The potential for transport to make an effective contribution to productivity and competitiveness should be reflected in planning objectives

The government should produce clear statements of strategic objectives which articulate the need for strategic transport capacity and development, balancing national economic, environmental and social considerations and the balance between national needs and possible local impact.

And that at risk is a lack of clarity about national policy, so that the public inquiry needs to determine the policy context for, and assess the basic case for, the development resulting in unnecessary cost and delay.”

These tests remain relevant and there is a question whether the draft NN NPS fully meets them. There is a brief summary of need and a statement of objectives at the beginning of chapter 2 but then the draft rapidly becomes focussed on modal specifics – i.e. road, rail and strategic rail freight interchanges.

We believe missing from the draft NN NPS are both a coherent framework for the infrastructure schemes that Government wants to see brought forward and how policies across the modes are to be integrated together. A key thrust of the NN NPS should be to expand the capacity of the rail network and reduce the adverse effects of the road network (whilst accepting the need for enhancement of the existing road network beyond the existing highway boundary as the draft NN NPS already suggests).

Eddington also identified a broad policy prescription which was discussed again by the Transport Select Committee in *Transport and the Economy (2011)* and was found to continue to be relevant. Eddington concluded that the strategic economic priorities for transport policy should be: congested and growing urban areas and their catchments; together with key inter-urban corridors and key international gateways that are showing signs of increasing congestion and unreliability. This is because:

1. Supporting the UK's successful, agglomerated urban areas and their catchments. These are places where high congestion, high land prices or high wages suggest that transport improvements could have a real impact.
2. Maintaining or improving the performance of the UK's key international gateways. Specifically: deep sea and feeder container ports; roll on/roll off ports; and international airports, that support a high-level of business and/or freight usage and are showing signs of congestion and unreliability. This focus should incorporate surface access routes to these gateways, again where such links are showing signs of congestion and unreliability.
3. The key inter-urban corridors between these places, where they show signs of congestion and unreliability. From a passenger perspective, these corridors may connect urban areas with each other and with international airports; and from a freight perspective, they may connect ports with distribution hubs and distribution hubs with their eventual markets.

This analysis could be brought more clearly into the draft NN NPS.

We also have a number of further points about chapters 2 and 3

- On **high speed rail**, while it is clear in para 1.6 that the NN NPS does not cover HS2 (as it is intended that hybrid bills will seek the necessary legal powers for both phases 1 and 2 of HS2), the draft NN NPS is silent on the subject of the further development of the national high speed rail network beyond the existing plans for HS2 and on any significant variation of HS2 where it could be envisaged that powers could be sought through means other than the hybrid bill process. We think that – especially as further HSR developments are already under study (for example to consider Anglo-Scottish connections) – it should be made clear that the NN NPS anticipates and covers these further HSR network developments
- In support of the Government’s vision and objectives for the national network, the draft suggests that there is a need for development on the national networks to “unlock regional economic growth and regeneration, particularly in the most disadvantaged areas.” This wording is over-specific in its targetry; it misses the main point of **rebalancing the economy north-south** and the need to support regional growth outside London and the South East.
- Para 2.23 suggests that “in some cases, to meet the demands on the national road network it will not be sufficient to simply expand capacity on the existing network” and goes on to suggest new alignments may be needed “to support increased capacity and connectivity to meet the needs created by economic and demographic growth.” Para 2.24 goes on to refer to supporting “economic growth and quality of life rather than meet unconstrained traffic growth.” The **circumstances for new road alignments require clearer policy guidance** – these might include for example substantial relief from the adverse effects of traffic on communities to ensure compliance with air quality obligations, to reduce accident levels and improve safety, and to reduce energy consumption. Being clear about the limited circumstances for new road-building will also assist those responsible for developing appropriate rail strategies in response to rail capacity constraints and potential mode shift from road.
- In comparison paras 2.32-2.34 set out a clearer exposition of policy in relation to rail to improve capacity, capability and reliability. Para 2.33 begins to set out criteria for new or re-opened alignments, including step change improvements in capacity and connectivity between key centres, speeding up

journey times and encouraging mode shift. However, **whilst we agree with these criteria for new or re-opened rail alignments they are too narrow.**

New and re-opened alignments can also be expected to be needed to:

- Enhance efficient use of the network and to reduce operating costs
 - Overcome barriers to use of the network by the provision of 'missing links'
 - Provide better connections to key multi-modal hubs (such as airports, and HS1 and HS2 stations)
 - Help overcome susceptibility to flooding, sea level rises and storm damage that affect some existing railway lines
- Chapter 2 of the draft NN NPS highlights interchange between the strategic road and rail network in relation to the need for strategic rail freight interchanges (which we support). However **the NN NPS is silent on road/rail interchange for passengers.** While chapter 3 goes on to reference sustainable transport, the NN NPS should more clearly support car parking, kiss and ride, bus interchange, cycle parking, walking strategies and segregated access to stations on the national rail network. This is an area where the passenger rail industry can come up against local authority parochialism that the NN NPS needs to help overcome.
 - Chapter 3 makes **only general reference to emissions, and environmental policy, safety, technology, sustainable transport, and accessibility.** These issues, as we have already highlighted, need to be brought more clearly into the policy framework and criteria for the need for development of the national road and rail networks and SFRIs.

In summary, **a coherent framework for the infrastructure schemes that the Government would want to see brought forward and in particular how they integrate together is currently missing from the draft NPS.** We consider that a key thrust of the NN NPS should seek to expand the capacity of the rail network and to reduce the adverse effects of the road network and the traffic that uses it, making clear that there are other good reasons why enhancement of the existing road network beyond the existing highway boundary may be needed.

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? (see Chapter 4 of the NN NPS)

Q4. Does the draft NN NPS give appropriate guidance to scheme promoters? If not why not? (see Chapter 5 of the NN NPS)

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? (see Chapters 4 and 5 of the NNNPS)

Q6. Does the draft NN NPS give appropriate guidance on appropriate mitigation measures? If not why not? (see Chapter 5 of the NN NPS)

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

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

Q9. Please provide any further comments regarding any aspect of this consultation.

Greengauge 21 does not wish to respond to Qs3 to 9.

Greengauge 21

26th February 2014