

Transport Planning Society

TPS response to the National Policy Statement (NPS) on Transport

Introduction and Summary

The National Policy Statement (NPS) on transport fulfils an important function in relation to the scrutiny of transport infrastructure projects. Its opening paragraph states:

“The NPS sets out the Government’s vision and policy for the future development of nationally significant infrastructure projects on the national road and rail networks.”

However, the next paragraph states:

“The Secretary of State will use this national policy statement as the primary basis for making decisions on development consent applications for national networks nationally significant infrastructure projects in England”

Thus the NPS is a bit like a national transport policy statement, but is in fact mandatory guidance for the scrutiny of major projects on a “national” network (which is in fact flexibly defined) through the mechanism of a public examination. A national policy would cover all networks – is that the intention here? There appears to be an ambiguity which is not insignificant, since the guidance for parts of the network should really express overall policy, rather than be a substitute for the lack of it.

TPS considers that a properly constructed national transport policy should be the basis for guidance and public scrutiny, and that all infrastructure should fit within a framework which considers the demand for travel; the different nature of travel locally, regionally, nationally and internationally; and a clear vision of how that transport policy will affect the nation’s health, the economy and the environment. The latter should include greenhouse gas emissions and climate change targets. Only then can the need for new infrastructure, which TPS recognises may be needed, be properly defined, and its value for money assessed.

Some of these essential policy items are included in the NPS, and TPS has responded to these as though they were parts of transport “vision and policy” to which the Government aspires.

Unfortunately parts of the document dismiss key policy elements as simply irrelevant, including demand management and the use of sustainable modes. These need different types of infrastructure, or, as in the case of bus and cycle priority, the reallocation of space on existing infrastructure. Reducing congestion (a key objective of the NPS) through better organised management and maintenance of the network is also ignored.

We have taken the opportunity to respond in full rather than use the web based questions. We have made the point before that these inevitably create serious doubts over the impartiality of the consultation. The responses are structured by the questions, and the summary of the consultation uses those same responses. This tends to marginalise the most fundamental comments - which call into question the basic premise on which the proposed policy is based.

This response does indeed challenge the premises on which the current NPS is based. The first section sets out our response, the Annexes provide some further detail of the reasoning behind it.

TPS key responses to the document

Strategic Rail Freight Interchanges (SRFI)

TPS considers that the inclusion of Strategic Rail Freight Interchanges in the NPS (replacing the 2011 statement) is evidence based and indeed may underestimate the national congestion benefits because the roadspace required by larger HGVs continues to be seriously underestimated. It needs to be integrated with local land use distribution policies (as do all the NPS proposals). The definition of a strategic rail freight network alongside the SRFIs makes this a positive move which TPS supports.

Rail network

Rail forecasts have been particularly unreliable in earlier years, failing to pick up step changes in demand and are still not well integrated with road forecasts. This tends to underestimate rail's impact on traffic and congestion and this is evident in both the latest National Road Traffic Forecasts (RTF 2013) and the draft NPS. The separation out of arguments over HS2 confirm a failure to recognise the role of improvements elsewhere on the rail network, particularly if they could be associated with land use planning, and in creating high capacity networks to serve the major conurbations. This is another area where the NPS is weak – even its own maps (see Annex A of the draft statement) show the dominance of city traffic in terms of causing congestion now and in the future.

Road network

This is the weakest section of the NSP, not only containing unsubstantiated claims, but some which appear to us to be plainly incorrect. In summary, the NSP claims that:

- Maintenance and asset management *“will do nothing to enhance capacity to cater for traffic growth, tackle existing pressures on the network or unlock economic development and housing”* (para 2.17)
- Demand management *“can only make a relatively small impact in alleviating the damaging effects of congestion”* (para 2.18)
- For mode shift *“it is not realistic for public transport, walking or cycling to represent a viable alternative to the private car for all journeys, particularly in rural areas and for some longer or multi-leg journeys”* (para 2.20)
- It concludes: *“These alternatives will not be sufficient to address the damaging effects of congestion on the economy, quality of life and job opportunities”* (para 2.21)

It is worth noting that land use planning, either to minimise the need to travel, or locate travel generators close to sustainable networks (especially rail and rapid transit) is completely missing.

Weak evidence base

Traffic growth and congestion

The NSP makes the above assertions (and omits land use planning altogether) despite there actually being evidence that traffic and congestion can be reduced by such measures, particularly in the places where congestion is at its most severe. For example, traffic has grown far less in cities than elsewhere – around 5% in 20 years while on motorways it grew over 50% in same period. In recent years it has been stable. Now that GPS monitoring data is available it is possible to assess traffic congestion on a wide range of roads and DfT publishes data outside the Strategic Road Network, for example on local authority A roads. These carry about a third of national traffic (as does the SRN) and again show very little change in congestion. One of the best known public GPS data sets also shows the apparent lack of an emerging congestion crisis. In fact, the UK on average experienced lower levels of congestion in every year since 2009/10 when the data was first published.

Much of this useful data is unfortunately not classified so that comparisons between measures of congestion and traffic can be easily made. We would like to see Government making a few simple

adjustments to how its own data is published so that its value can be maximised for professionals and public alike.

Returning to evidence, we also note the RTF 2013 says in relation to its failure to accurately represent London traffic that:

“A sensitivity scenario has been constructed for the 2020 NTM forecast that attempted to match TfL forecasts for car ownership and car traffic for the same period....

...total London car ownership fell by 16% in 2020 compared to our current NTM central forecast, with 2020 London car traffic around 9% lower Overall, car traffic on the SRN in 2020 was around 1% lower than central forecast.” (Box 2, page 7).

There are two elements in the way that the London correction is being used which are rather misleading. The first is that the time horizon is only 10 years as opposed to the main forecast which is for 30. In addition, traffic on the whole of the SRN nationally is being used as the basis for the comparison with a change to London traffic alone. This is again misleading for two reasons:

- 1 if the policies pursued in London were to be applied to other cities (which they are in part already) the effect would be much greater, especially since congestion mainly occurs around the major cities
- 2 the metric is wrong – it should be congestion, not overall traffic and this would be likely to be much more affected since congestion in London is a high proportion of the national total.

Land use planning

The omission of land use planning is surprising, considering that it is the disposition of land use that generates virtually all transport demand. The density of housing is the key driver both for transport demand as a whole and the viability of public transport, local facilities and town centres. While it may be possible to define national networks in terms of geography, it remains true that even the longest distance trip has an origin or destination on a local network. Transport provision influences locational choice, and locational choice generates the demand to use those networks. This should be recognised in any sensible guidance.

Impact of other transport policies

The statement that demand management and other policies are ineffective is not justified in the draft statement. This is despite clear evidence from around the country that policies can and do work, and Government allocates significant amounts of money to pursuing such policies, at least in the short term, for example through LSTF.

Perhaps the most dramatic example of the effectiveness of packages which include active traffic management together with demand management was the London Olympics, with the challenge not only of dealing with visitors and getting athletes and organisers to venues on time, but of using the road network itself for events such as cycling. TPS has organised events around this subject which have examined the methods used and their impacts in some detail, and awarded our Transport Planner of the Year to the leader of the central London TfL Olympics team. The key here is that the techniques have far wider application than one off events – they have both built on the experience of demand management to date and added to it.

We also have some difficulty with the following remarkable statement in the draft NPS:

“Whilst advances in mobile technology are important and will influence travel demand, they are not expected to have a significant impact. In recent years advances in mobile IT, teleconferencing, email, the World Wide Web and social media have occurred alongside growth in travel demand on the national road and rail networks.”

If the changes in working, shopping and leisure brought about by the internet are so much less significant than most people, whether expert or not, believe them to be, now or in the future, some evidence should be produced. The statement itself is also wrong – for example growth on the rail network is related to the greatly enhanced ability to work on the train through the use of mobile computing, smartphones and internet. Growth on the road network has been far lower than expected given the rise in population – in other words traffic generated per person has not grown.

Failure to address carbon emissions

The Government's developing position on climate change appears to be that demand management has a small role in the short term (2% initially then declining) and that the delivery of reductions in carbon will be more efficient vehicles (zero carbon by 2040) and more efficient driving. This is one of the reasons for rejecting the importance of sustainable transport planning, much of which is undertaken by local authorities although often funded centrally (for example through LSTF).

The CO2 transport forecast is however based on a major readjustment made in 2013 in the National Traffic Forecasting report which has never been made clear. As part of preparing this response, a sense check suggests that this adjustment is implausible, assuming a drop in emissions from England's road traffic of about 20% in 10 years (2010 to 2020). Given the length of time before cars are scrapped, many cars driving today will still be active in 2020 and the forecast seems unlikely to be met. There has been a major change since the 2011 forecasts and our reasons for doubting the CO2 emission forecasts are set out in Annex 1. We have contacted the DfT to clarify this but have no response at the time of submission.

Local and strategic networks

The need for a comprehensive transport policy is illustrated by the separation of "nationally" important from "local" schemes. This ignores two important facts:

- 1) A large quantity of traffic, especially on the motorways around the major cities where congestion is worst, has a local origin or destination or both
- 2) Most origins and destinations are not on the strategic (national) network and in this sense all "strategic" traffic has to use the local networks for at least part of its journey.

In this sense one of the key elements in a transport "vision and policy" must be the relationship between local and national networks, and a clear understanding of the need to include this relationship in policy statements which are applied to them individually. This need to join up local and strategic networks was also raised in the TPS response on the new Highways Agency structure. Without this connection, national schemes will impose burdens on local networks (and thus people and businesses, all of whom are in a sense local) and national schemes will attract local traffic which will impede the longer distance "national" traffic which they are meant to serve.

Key questions to be answered

For the reasons given above we consider that the Government has failed to answer some obvious questions in relation to the evidence, for example:

- Why has congestion fallen in conurbations while traffic has been stable?
- Would the reasons behind this provide a solution to congestion on national networks?
- Why has motorway traffic grown so much faster than other roads – is there a longer trip length/land use issue for transport planning?
- Is it conceivable that transport and land use planning (first identified as a key factor by a previous Conservative Government) has actually been working?

- Why are proven techniques such as travel planning and established changes to travel patterns caused by new technology dismissed?
- Why are key issues such as co-ordination with land use planning and an integrated approach to local and national networks omitted?

Transport policies missing from the NPS

This response is not just a criticism and questioning of the NPS which we nevertheless consider in its road sections one of the weakest policy statements of recent years. There are some very obvious elements to national transport policy which have been completely ignored by the current draft and which we would like to see included. Key examples are:

- 1) Put transport land use planning back together as the key to solving traffic problems – demand is derived from the relative locations of people and where they want to travel to. In the past this was recognised but not given sufficient weight in policy or the allocation of funds.
- 2) Improve the links with local authorities and recognise the interrelationship between so called national and local networks. The National Audit Commission 2012 report (see Annex 2) shows the complexity of powers and responsibilities and that did **not** include the new relationships with Local Enterprise Partnerships (LEPs), and with Local Transport Bodies (LTBs). There is a large and confusing number of sources for funding, for example central Government grants (such as formula grants and competitions such as the Development Pool and LSTF), plus local resources such as developer contributions or prudential borrowing by the local authority. The competitions themselves have encouraged short termism and schemes which can be delivered quickly, or attract match funding, or tick the competition's specific boxes, rather than fit in with some overall plan for sustainable economic growth.
- 3) Recognise that transport planning is about communications as well as physical travel and, for example, invest in raising UK broadband to an internationally high standard. This would help rural areas as well as larger urban centres, where fibre optic networks are already extensive but could still be improved.
- 4) Replace current section on carbon with a mechanism to ensure that transport expenditure which does not address the likely failure of the transport sector (see Annex 1) to meet its carbon reduction targets will not be pursued without this being included in the appraisal. This would identify where the balancing reduction will come from. This could be costed using DECC values. Marginal changes between schemes and a "Do Minimum" are currently costed by DfT but failure to meet the transport target by a "Do Something" is not. Current models produce the data for this calculation and it should be undertaken for each scheme and the result entered in the Appraisal Summary Table. Recent scheme results appear to show that the carbon reduction targets for transport will not be achieved.
- 5) Make sure that transport expenditure which does nothing to improve the achievement of health targets is viewed negatively in the appraisal of all schemes and in their funding. There are means of calculating the benefits of schemes which do achieve health benefits which are in use by DfT and have been for several years.
- 6) Recognise and seek to address the fact that the NPS will not solve current road congestion problems. The only plan is to slow down the increase. This is not the case with rail or walking or cycling facilities which are in a sense future proofed. This factor seems to be ignored in the NPS.
- 7) Sort out the road maintenance issue – first the question of the backlog, but equally a move from reactive to preventative maintenance, and tight organisation of how roads are used for services other than transport. The latter two would clearly have an impact on congestion.

Preventative maintenance would probably save money in the longer term as well as providing better service for road users. It is probably more effective in terms of short term job creation than construction and offers real reductions in future budgets rather than notional time savings.

- 8) Set down an approach to the national network based on long term problem solving rather than a series of quick fixes. This is very apparent in current funding programmes, for example the Pinch Point fund. In a sense it is what the Multi-Modal studies at the turn of the century aspired to be. Several of these generated new ideas and integrated packages which aimed at addressing the objectives of sustainability and growth which are shared by the current Government. Unfortunately many of the demand management and sustainable transport elements have not been implemented.
- 9) While the DfT has become much more open and engaged in the last few years, it still needs to respond in terms of core issues such as how to include demand management and sustainable modes, the accuracy of its traffic forecasts in urban areas, and to resolve the ongoing debate on how to treat carbon.
- 10) In relation to carbon emissions there needs to be a response on the issue of the extremely optimistic reductions achieved by 2020, and the inadequacy (and complacency) of the assumption that vehicle efficiency will mean that demand management is not required.

Way forward

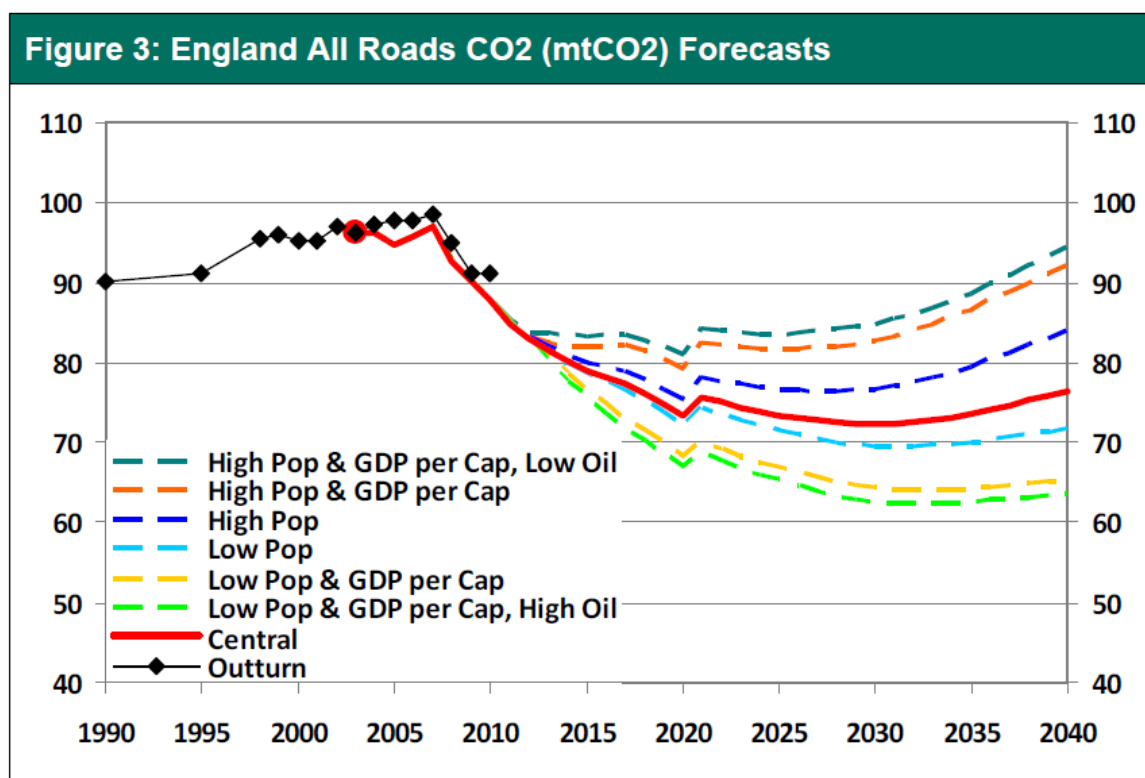
TPS considers that the paragraphs rejecting demand and other forms of management are unjustified and counter-productive. These need to be replaced. Land use planning and the relationship with local networks need to be fully recognised. Overall our criticism is fundamental and requires a detailed response and we are happy to meet to discuss this further. We also have a regular programme of seminars and events and would be happy to help DfT engage with a wider audience of transport practitioners.

Annex 1

Road traffic and CO2 emissions forecasts

Carbon emissions in the 2013 Road Traffic Forecast (RTF) report were predicted to reduce dramatically between 2010 and 2020 as shown in the chart below (Figure A1). The kink upwards after 2020 is because future limits to new car emissions are not known. However, the key issue concerns forecasts from now until 2020.

Figure A1: 2013 RTF



The fall from 2010 to 2020 was not reflected in the 2011 RTF forecast, although it was based on the same assumptions about car, van and HGV efficiency, in particular the EU levels of CO2 of 130 gms/km in 2015 and 95 gms/km in 2020. This is not fully explained, but it appears that the 2013 forecasts have been adjusted for faster introduction of low emission vehicles. The 2013 RTF says: *"We have used these estimates to adjust the total estimated emissions from the National Transport Model. We are working to develop the NTM to incorporate ULEVs so that key outputs such as CO2 emissions and air pollutants are estimated directly by the NTM."*

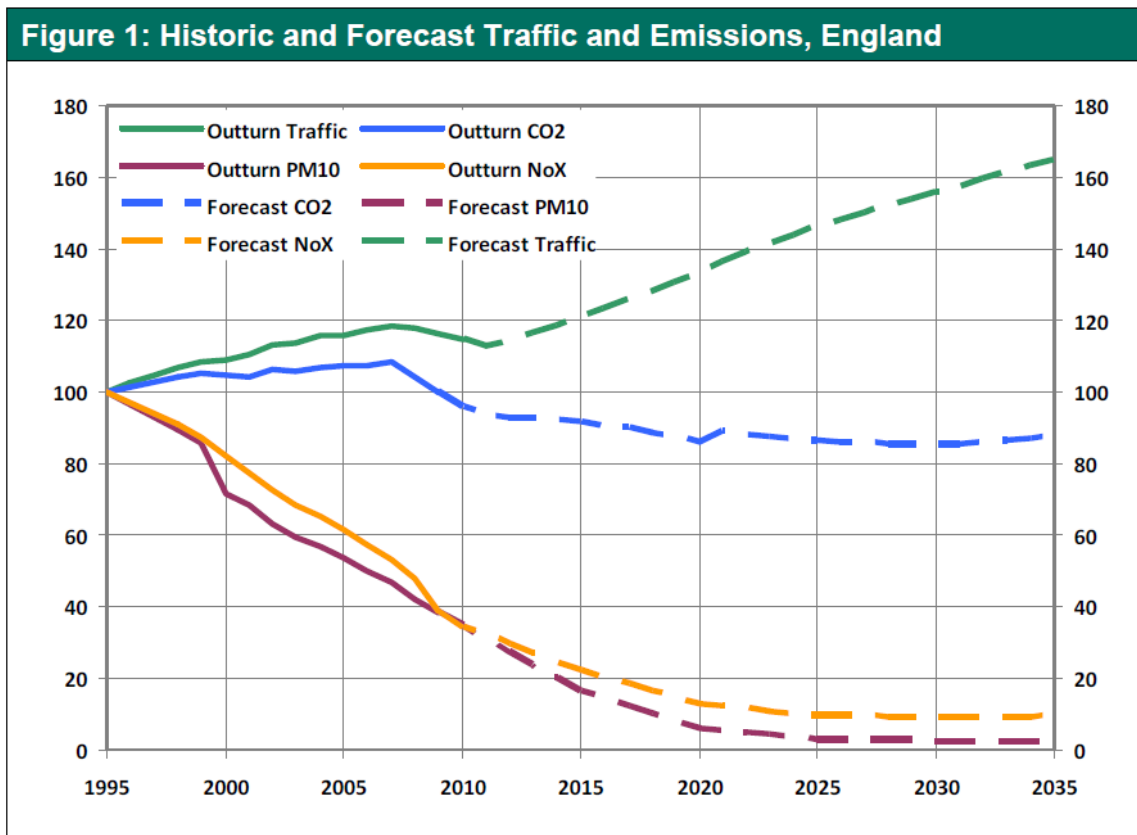
Because vehicles take time to be scrapped, the 2013 forecast reduction seems implausible. In support of this view, the reductions shown in the 2011 RTF, based on the same EU targets for cars and what appear to be the same assumptions for vans and HGVs, are much lower.

The difference is very considerable, the 2011 RTF predicts a 10% fall in CO2 while the 2013 version predicts a fall of about 20%. This is shown in Figure A2. The visual difference is exaggerated somewhat by the different scales, which makes it appear even greater.

Using scrappage rates from the Society of Motor Manufacturers and Traders the 2011 figures appear plausible and in line with the EU targets (themselves challenging).

DfT were contacted by TPS about this apparent anomaly but at the time of submission have not replied.

Figure A2: 2011 RTF

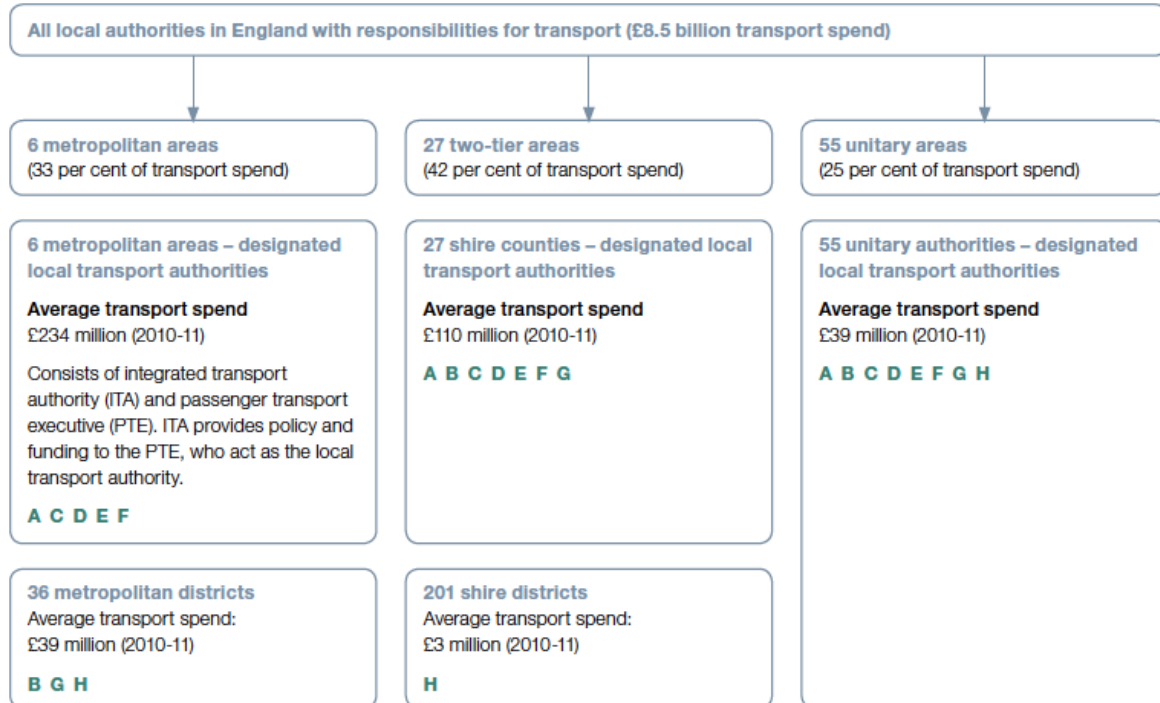


Annex 2

Extract from the 2012 National Audit Office Report

Responsibilities for transport in the three types of local authority areas, with examples

Responsibilities for transport vary across different areas



Key to local authority responsibilities

- A** Produces the local transport plan
- B** Maintains local highways
- C** Provides extra rail/light rail services
- D** Delivers major projects (including bidding for central government funding)
- E** Subsidises bus services that are socially necessary but would not otherwise be commercially viable
- F** Compensates bus operators for concessionary fares
- G** Receives the formula grant administered by the Department for Communities and Local Government
- H** Gives planning permission for developments

Source: National Audit Office review of various local government documents and spending data

Note: LEPs and LTBs will direct significant funds from UK Government sources and Europe and may interact with existing responsibilities at different levels in the above.