

# Transport Planning Society

## Consultation response to the National Network National Policy Statement

The Transport Planning Society (TPS) is the only professional body focusing entirely on transport planning in the UK. The aim of the Society is to raise the profile of transport planning and chart a course for the profession at a time of unprecedented change and challenge.

### Introduction

As with many Government policy statements in a time of change and transition, the draft NNNPS recognises the need for change while at the same time resisting a full commitment to it. In our view, this inevitably leads to ambiguity and subsequently to disagreement over the real impact and value for money of specific schemes. This generates conflicts which the current system is not capable of resolving - which then inevitably end up being arbitrated on by the courts. None of this leads to efficient, evidence-based decision making or to outcomes which stakeholders will accept, even if they don't agree with them. Our point is that many decisions on NNNPS schemes may not be welcomed by all concerned but they will have wider acceptance if the processes by which they are reached are seen to be transparent and fair. This is not the case at present. Examinations in Public (EiPs) on Development Consent Orders (DCOs) where objector statements are subject to time limits in terms of minutes, where important issues are ruled as irrelevant and where technical information is withheld or incomplete lead to disillusionment and finally to cases in court. For this reason the DCO process itself has become highly legalistic. TPS does not consider this to be a satisfactory situation.

In terms of the new draft, we welcome the progress made since the last NNNPS but propose some changes to make it a more effective and practical tool to improve our national infrastructure policies and programmes, and therefore help to reduce some of the tensions that are frustrating the efficient delivery of schemes and initiatives.

### Underlying Approach from TPS

The draft statement itself is the high level guidance for more detailed programmes which follow, including rail and rail freight but also the five year road programmes run by National Highways (RIS). This is referred to in para 3.32. TPS will make further detailed comments on RIS3 by the deadline in July. The road programme has a much closer integration with other policies for transport than rail, and tends to have a wider and deeper impact on the environment. For example, road traffic is by far the dominant source of transport sector carbon emissions. For this reason it attracts more attention, especially where providing for it has many second order effects including around road safety, loss of biodiversity, air pollution etc.

In order to address some of the problems we have set out some principles which the Statement should follow.

- 1 The Statement should be evidence based, and report both evidence and Government policies accurately
- 2 The Statement should be consistent with other guidance and support Government policies as a whole

- 3 The approach should reflect a transport planning approach to transport projects in the NNNPS i.e. problem solving and open minded
- 4 The importance of interaction between networks (including broadband access) must be reflected in the guidance
- 5 The guidance should be clear and usable in the assessment of major schemes, for example in the DCO process.

### **Key topics and recommendations**

#### *Induced traffic*

- 1 The Statement needs to better reflect the evidence on induced traffic. Para 3.3 says *“Evidence that development on the network leads to induced demand is limited.”* While pretty much any research is limited, the evidence on induced traffic, especially where there is congestion, is clear, even in the reference which the Government uses. This is not accurately reported in the NNNPS. This has major implications: if induced traffic is highest in areas of highest congestion, increasing capacity for this reason is bound to have serious negative consequences. Active management of use and demand is an essential complement to capacity, whether that capacity is existing or newly proposed. All efforts to optimise existing infrastructure should therefore be exhausted before expensive capacity enhancements are considered, and whether such capacity enhancements will be able to deliver improved outcomes given the likelihood of induced demand should be explored in detail through the decision-making process. The NNNPS should be redrafted to make this explicit.
- 2 Current modelling techniques for induced traffic or mode split are not always fully implemented during scheme appraisal, and in any case often do not take the evidence on suppressed demand fully into account. The NNNPS needs to say that all major road capacity increases on the SRN should be subject to a simple induced traffic sensitivity test, for example using a matrix uplift. By so doing this would help make clear to decision makers all the likely impacts of the scheme, positive and negative, and reduce the need for such issues to be debated in EIPs and ultimately the courts.

#### *Carbon from the SRN*

- 3 The importance of transport and the SRN for carbon is not set out in the draft. In para 2.24 it mentions 2% for construction and operation *“with the vast majority generated by the vehicles that travel on them.”* TPS does not recognise this statistic and think it is possible it does not include daily use as implied in the draft. Travel on the SRN carries about a third of road traffic (more of HGVs) which itself is 90% of domestic transport emissions. The statement needs to be clarified.
- 4 It is clear therefore that the future management and development of the SRN has a crucial role to play if the UK achieving its legally obligated reduction in carbon emissions. Evidence suggests that central to reducing road-based carbon emissions is the pace and extent of the shift to electrification; increases in the efficiency of car use and increasing car occupancy in particular and; reducing demand via ‘avoid’ and ‘shift’ type

interventions. A recent study<sup>1</sup> by Dr Greg Marsden has indicated a potential need to reduce car mileage by c20% if the UK's sixth carbon budget targets are to be met - a figure broadly consistent with that set out by Scottish and Welsh governments, and also regional bodies in the UK such as the Greater London Authority. In our view the NNNPs does not do enough to show how the SRN will practically contribute to these key drivers of decarbonisation in the sector and this lack of focus is regrettable.

- 5 Section 5 deals with Greenhouse Gas emissions and has some positive content, for example that carbon must be considered at an early stage (5.29) and the need for a carbon management plan (para 5.31). The draft also refers to "residual emissions" (e.g. para 5.28). It is crucial that this is not used as an excuse to promote schemes which have not taken every action to minimise or avoid them (including all possible attempts to actively manage demand before pursuing infrastructure enhancements). The problem with Section 5 is that there is a lack of clarity on what the "*steps...to drive down the climate change impacts*" should be. The paragraph on the carbon management plan (5.31) is written with an emphasis on technology, for example bullet 2. This also increases ambiguity by adding "*(recognising that in the case of road projects while the developer can estimate the likely emissions from road traffic, it is not solely responsible for controlling them)*". The point is that the provision of capacity in a congested situation will generate more demand. This odd caveat should be removed and instead a separate bullet added with clear guidance on the consideration of alternative approaches which would result in lower residual emissions. We suggest this should be inherent in the whole DCO/EiA process later in this submission but it is particularly needed here.

### *Complex interactions*

- 6 One important area where the draft statement needs amendment is on the interaction between local and national networks. There is a false distinction between strategic and local traffic which needs to be resolved (e.g. in para 2.6). On much of the SRN traffic has one or both trip ends in an urban area where strong demand management policies will be in place, in line with government policy. This means that action to improve journey speeds for driving by those in private vehicles will likely undermine action to improve the attractiveness of public transport, walking and cycling and potentially increase congestion in origin and destination areas.
- 7 Experience suggests that the scope of the Local Transport Model is of critical importance when seeking to assess the wider impacts of a road scheme on the local transport network. We are concerned of reports that National Highways often fail to take full responsibility for the secondary effects of their schemes (particularly induced demand) on the wider network. The responsibility for addressing impacts on the local highway network will more often than not fall to the Local Highway Authority, which is likely to lack the capacity and resources to implement appropriate resolutions. The cost of rectifying issues on the local network is often not included in the business case for the primary scheme and so this case will often promote a more favourable picture than is actually the case had all its cost been considered. These issues must be of central interest to the EiP process and the Examining Authority, and should be given time to be

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<sup>1</sup> (Marsden, G. 2023. *Reverse Gear: The reality and implications of national transport emission reduction policies*. Centre for Research into Energy Demand Solutions. Oxford, UK. ISBN: 978-1-913299-17-0),

properly aired, including proper discussion on potential alternative solutions to the issues that the scheme is looking to resolve.

- 8 Linked to this issue, the importance of land use is under-estimated throughout the statement. It is the prime source for trip making on the strategic as well local networks. The location of Strategic Rail Freight Interchanges is an example where thought has been given to this issue in the NNNPS, it needs to be stronger in promoting locations and land use policy linked to sustainable transport. A key result of major road schemes is to lengthen journeys due to the multiple choice of destination for passengers and depots for freight.
- 9 The interaction both between modes and between non-transport substitutes for travel is not reflected, for example evidence suggests broadband provision can influence substitution of travel with opportunities to remote work or complete other trip generating tasks virtually.

### *The future is not fixed*

- 10 The statement also refers to the DfT traffic projections in para 3.28. This is a scenario based approach which DfT has been working on since 2015. It has recently published and the Uncertainty Toolkit (2021) which has had considerable professional support. The projections are not complete but represent a more realistic approach to traffic forecasting. The approach in these documents needs to be at the heart of the NNNPS. We suggest there needs to be greater emphasis on the need for serious alternative options to be considered for major schemes and for this to be a mandatory element in any DCO and a specific topic and open to scrutiny at every EiP.
- 11 The draft seems to contain some recognition of this, for example in para 3.42 and 3.44, the latter saying that the TDP moves away from “predict and provide”. However it goes on to suggest “specific interventions brought forward under the NSIP regime in specific locations” (3.43). There needs to be a clear statement of what the circumstances are which would justify such interventions and that they will not be predict and provide led.
- 12 While recommending clear guidance in the NNNPS for DCOs in that the induced traffic test and proper option development need to be included the process needs to be made transparent. Given the way this done at present we suggest external validation of these, not led by National Highways. This could use approaches such as the independent commissioning or validation of technical justification and its availability well in advance of any EiP. TPS considers this would speed up the scrutiny process, improve decision making and reduce costs to all parties.
- 13 There needs to be a joined up approach to reflect the most recent DfT work and the TDP and link through to the RIS3 preparations. These should therefore not be on the “Predict and Provide” basis and reflect both uncertainty and the impact of policies and the resultant programmes on demand. The latter is implicit in scenario building.

### **Conclusion**

TPS welcomes the progress made in the new draft when compared to the existing policy statement, but considers there is still a need for some points to be further clarified and strengthened in key areas. We would be happy to meet to expand on these points and are also aware that other bodies and practitioners are making parallel comments. We would be happy to meet with the Department individually, but are also willing to support a round table event with them if that would help move the process forward.