

The national networks national policy statement: 2023 draft

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Organisation details

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Transport for the South East

NNNPS process

Q4. In your view does the draft NNNPS provide suitable information to those engaged in the process of submitting, examining and determining applications for development consent for nationally significant infrastructure projects on the:

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
strategic road network?			X			
strategic rail network?			X			
strategic rail freight interchanges?		X				

Explain why, referring to specific sections of the NNNPS in your response.

The NPS is a very important document, setting out the national policy context for the development and delivery of Nationally Significant Infrastructure Projects (NSIPs) on the national road and rail networks. TfSE is pleased to have the opportunity to comment on the draft NPS, given the important role that sub-national transport bodies play in working with local and national partners to shape regional investment priorities, which includes both national and local networks.

The TfSE transport strategy (published in July 2020) was developed based on a 'decide and provide' approach to transport provision. The transport strategy utilised future demand modelling to understand how and where the transport network might experience future strain. However, instead of simply identifying capacity enhancements for those parts of the network, the transport strategy sets out how potential congestion could be alleviated through multi-modal, cross network interventions, investing in public transport alternatives, developing integrated land use planning policies, adopting emerging transport technologies, and demand management policies.

We were therefore pleased that the draft NPS document references the importance of sustainable development and supports DfT's commitment to move away from predict and provide towards a vision-led approach. However, the remainder of the document does not appear to align with a decide and provide approach.

Firstly, it presents national networks as being separate from local networks, despite most trips on national road and rail networks starting and/or finishing on local networks and often in urban areas. National networks (particularly urban motorways) are often perceived as part of the local road network by local communities, so policies across both networks need to be carefully integrated, and the wider impacts of investment in strategic networks on local networks must be carefully understood.

Secondly, the draft NPS doesn't acknowledge the inherent relationship between strategic road and rail networks and how, for example, investment in passenger and freight rail capacity and connectivity could have congestion and emissions benefits on the strategic road network. Separating road, rail, and freight as they are in the draft NPS implies policies and investment decisions for each network are also made separately, rather than taking a more integrated approach to the system as a whole.

The NPS provides broadly useful context for development consent applications, but the suitability and practical use of its information for those engaged in the process of submitting, examining and determining such applications is limited. The information is broad and contextual, and as such it will be possible to frame both support for and objections to applications on the basis of the same elements of the policy. The information on demand is out of date and potentially provides a misleading picture of the need for and benefits of strategic investment particularly in rail.

There is little demonstration that 'decide and provide', is the intended approach. The information about both need for and policy in relation to rail emphasises the needs of existing rail users. It is limited on the need for and drivers and benefits of a shift to rail from other modes. Road investment appears to be based around growth of population leading to more road capacity need. There is no consideration of demand management, road user charging or other viable means to reduce capacity requirement and support travel choices.

The document does not provide any practical guidance on how alternatives to major road and rail capacity enhancements could be explored and funded. In providing choice for example, it might be more appropriate to invest in public transport, active travel and demand management measures on the surrounding networks, as an alternative to a road capacity enhancement scheme in an urban area, but the way that scheme assessments and investment decisions are currently made does not support meaningful exploration of such alternative or hybrid packages. The NPS guidance could help to address these challenges by providing clear guidance on how integrated solutions could be assessed, developed and delivered, particularly in the context of forthcoming DfT LTP guidance and the expected emphasis on a vision-led approach to local network planning.

The draft NPS makes multiple mention of mode shift (primarily in relation to rail freight) but does not follow that through with clear guidance on the potential for modal shift as an alternative or complementary component to major capacity enhancements. It does not set any clear aspirations to reduce demand for road travel through a decide-and-provide approach. The Committee on Climate Change's 6th Carbon Budget assumes, under its balanced Net Zero Pathway scenario, that 5-7% of car journeys could be

Q4. In your view does the draft NNNPS provide suitable information to those engaged in the process of submitting, examining and determining applications for development consent for nationally significant infrastructure projects on the:

shifted to walking and cycling by 2030 and 9-14% by 2050. It is also assumed that 9-12% of car trips can be switched to public transport by 2030 (17-24% by 2040). The dataset which sits behind the Sixth Carbon Budget shows that, during the 2020s, a very significant proportion of required CO2 emissions abatement is assumed to come from demand reduction (over 36% for 2021-25 and nearly 27% for 2026-30). It would be helpful for the NPS to reference these challenges. Much of this has the potential to be achieved by widening the choice for users.

There is also no mention of PAS 2080 carbon management standards which emphasise the importance of managing carbon impacts as early as possible in a strategy or scheme's development as possible to minimise both embodied and operational carbon emissions.

The NPS gives guidance and direction in line with legislation and government targets regarding the negative effects that new NSIP infrastructure may have and that they require consideration. What is not covered is the methodology or levels of acceptability other than that this detail is set out in the TAG. There are several mentions of accepting adverse effects if schemes are imperative for reasons of overriding public interest but not what qualifies a scheme as such. There is a risk that the NPS may not improve the effectiveness of delivery as the same objections and challenges will be levelled at schemes as currently under the existing NPS. If the NPS were to quantify levels of acceptability and methods of measure this would assist applicants. Not only in terms of what is of public interest but how to measure adverse effects and what levels are acceptable/desirable/required.

The NPS sets out the need and requirements for SRFI's to a much greater degree than road and rail. By their nature it is possible to be more specific. Chapter 4 sets out the requirements for minimum number of trains and their length that an SRFI should be able to handle. The infrastructure and type of location that would be more likely suitable as it did in the 2014 release.

Developing national networks

Q5. Does the draft NNNPS adequately set out:

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
the need for developing national networks?			X			
our policy for addressing the need for the development of national networks?			X			

Provide comments on improvements referring to specific sections of the NNNPS in your response.
the need for developing national networks.

The statement of need is aligned with government policy and broadly fits with TfSE's understanding of the need for transport infrastructure:

- performance,
- economic growth,
- resilience,
- environment
- and safety.

The NPS sets out a case that there is a compelling need at a strategic level for the development of the national networks, both as individual networks and "as a fully integrated system". The overarching emphasis in the statement of need, is that demand is expected to continue to grow in future decades and that the need to provide a reliable and resilient network (for both roads and rail) is likely to override most negative impacts (including carbon emissions). It therefore appears to be an assumption that additional capacity will be necessary for national networks to fulfil their objectives.

It would be helpful if the NPS gave much more nuanced guidance to scheme promoters on how to assess need in specific locations (rather than simply setting out a more generic need for investment at a national level), and how they should work with partners to explore a wider range of options to tackle a specific issue on a particular part of the network; taking into account the full range of positive and negative impacts of investment decisions, particularly where major capacity enhancements are being considered.

The draft NPS underplays the potential for new SRN capacity to induce demand for travel (it states in paragraph 3.3 that "Evidence that development on the network leads to induced demand is limited"). However, the WSP/Rand report that this paragraph refers to, whilst acknowledging that the evidence base is not definitive, in fact states that: "Induced demand continues to occur and may be significant in some situations. The evidence reviewed in this study supports the findings of the SACTRA (1994) report that induced traffic does exist, though its size and significance is likely to vary in different circumstances". The report goes on to highlight that "induced demand is likely to be higher for capacity improvements in urban areas or on highly congested routes" and that "the evidence on the existence of induced demand means that it needs to be properly accounted for in the appraisal of capacity improvements to the Strategic Road Network." Hence, the NPS should reference this evidence more accurately and give much clearer guidance on the situations where induced demand is likely to be a particularly high risk and how this should be dealt with through the exploration of a wider range of options to tackle capacity issues on the network. This would reinforce the opportunity in urban areas to explore opportunities for demand management and mode shift as an alternative to capacity enhancement schemes on strategic networks.

The NPS does not address the issues of siloed funding of transport infrastructure and how this undermines the ability to do truly integrated transport planning. The importance of modal shift and behavioural change that will be required to achieve net zero are omitted other than in 3.31 where it is stated "Equally interventions could include measures to reallocate road space to systems for journeys addressing traffic growth via a vision-led approach to that plans for modal shift." Planning should include these types of intervention as part of the solution to the need for improvement rather than as a "bolt on" to road schemes. Greater benefit may be found through consideration of options to reduce traffic through mode shift rather than add capacity/reduce congestion with an element of active travel mode shift enablement built in.

NPS rightly references the importance of transport investment in supporting economic growth and the government's levelling up agenda; and it is critical that investment in the national networks is well aligned with local plans for delivering new houses and jobs. The NPS could be more explicit about the ways in which investment in national networks can "unlock sites for housing and employment growth made accessible by sustainable transport and the regenerative impact major infrastructure can play in driving urban renewal, increasing density, as well as creating new places and communities" (para 3.8). Whilst investment in new rail infrastructure (such as delivery of new stations or line extensions) can support a "transit-oriented" development approach new development. It's less obvious how investment in the SRN will deliver urban renewal and density. This needs to be more carefully articulated and made explicit in how different network investment decisions might support sustainable new development.

The data and commentary on rail demand risks failing to set out the need for development of the rail

Q5. Does the draft NNNPS adequately set out:

network and may even undermine the perception of that need. The recovery of rail demand has moved on considerably from the position in October 2021 and the data to June 2022.

Our understanding of the industry's latest position is that overall journeys are approaching pre-Pandemic levels, with commuting journeys and journeys within London – two key drivers of capacity requirements – at or near 2019 levels. Leisure travel by rail is already in excess of 2019 levels. It should be emphasised that growth in leisure travel is in addition to the return of commuting demand.

The pattern of rail travel is also now relatively well understood and stable, with Tuesday-Thursday journeys close to 2019, Mondays and Fridays lower but still approaching pre-Pandemic levels, and weekends and bank holidays significantly higher than pre-Pandemic. This is all despite the disruptive impacts on passenger demand of industrial action over the past year.

It is therefore likely that, as the industry expects, overall rail demand and growth rates will return to pre-Pandemic levels within relatively few years. This is particularly relevant given the timescales involved in developing and approving significant rail schemes.

The draft NPS rightly recognises that the rail network has been and continues to be congested, however this can be reinforced. In addition to the rightful focus on capacity, frequency and speed shortfalls in the midlands and north, the extent of crowding on trains and in stations in the south east has historically been acute. This has often meant that rail investment in the south east was 'running to catch up' with demand and crowding. Furthermore, post-pandemic passengers' needs are likely to reflect different perceptions of and behaviour in response to crowding. The NPS should not be able to be interpreted in a way that suggests the medium and long-term need to decide on and provide for rail development in the south east has been materially reduced by a temporary reduction in demand.

Drivers of need for the development of the rail network should also include the demand likely to be created by modal shift away from private cars, and not only consider pre- and post-Covid levels of capacity. Development of the network to enable modal shift will also need to include improving access to and interchange with rail, and increasing its reliability, as well as providing capacity.

The need for development to support the growth of rail freight is well expressed and something we strongly support, recognising that a positive policy and planning environment will be needed to actively support the development of rail freight.

Policy for addressing the need for the development of national networks.

The NPS sets out a range of measures at 3.42 that can be employed to make best use of all road capacity and to reduce demand on the SRN, including:

- enabling more active travel and public transport,
- locating and designing new developments to reduce car dependency,
- use of technology to better manage use of the network,
- and ensuring that the network is well maintained,

but then goes on to conclude that "the competing demands for road space will remain or even increase with diversification in the type and number of users, the vehicle they use, or where alternative sustainable modes are prioritised", and therefore concludes that investment in capacity enhancements is inevitable, stating in para 3.46 that: "The government's wider policy is to bring forward improvements and enhancements to the existing SRN where necessary to address the needs set out earlier. Enhancements to the existing national road network will include, but are not limited to:

- New and improved junctions and slip roads
- Improvements to trunk roads, in particular, dualling of single carriageway strategic trunk roads and additional lanes on existing dual carriageways
- Measures to enhance capacity of the motorway network".

The challenges on the current SRN are well known, evidenced and understood, and we would support improvements or enhancements where this is the case. Roads are important corridors and will continue to be so. Our SIP identifies a number of targeted integrated interventions to deliver better connections for freight, private and mass transit vehicles, and de-conflict local and longer distance traffic. We can already envisage a low carbon future for road use with improvements to the SRN helping to facilitate transport choice.

The policy to improve the connectivity, capacity and reliability of the railway network in order to realise the benefits of rail is very welcome. In the context of this policy, we note that the Rail Network Enhancements Pipeline (RNEP), to which NPS refers, has not been updated since autumn 2019. For NPS to be seen to be addressing the need, it would benefit from a commitment to regular, such as annual, updates to the RNEP.

In order to demonstrate that the need for transport choices is addressed, NPS should also highlight the potential for developments that improve access to and interchange with rail, including station developments as well as 'new rail links'.

Q5. Does the draft NNNPS adequately set out:

We recognise the need, as NPS states, for choices to be made in the context of the need for financial sustainability. In this context, we would welcome a more explicit and specific confirmation in NPS that a 'decide and provide' approach is to be taken to meeting the need for development.

General policies and considerations

Q6. In your view, is there any information missing from the "General Principles and considerations" chapter?

Yes

Information missing from General Principles and considerations

Q7. Provide comments on missing information, referring to specific sections of the NNNPS in your response.

The role of Sub-National Transport Bodies (STBs) is not mentioned in the document. STBs play a vital role in advising ministers on priorities across regional areas based on extensive evidence-led study work, and significant engagement with national and local stakeholders. By overlooking the role of STBs, NPS is missing an important element of expertise, evidence and an important opportunity to better integrate priorities across both local and national networks, within the context of a coherent regional transport strategy.

the NPS should specifically refer to the evidence produced by STBs which considers integration of modes, has regard to land use and will facilitate growth and a journey towards net zero.

Supporting freight facilities

Q9. Does the NNNPS support development of:

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
freight facilities on the strategic road network, including lorry parking facilities?		X				
freight interchange infrastructure that encourages modal shift from road to rail?		X				

Explain why, referring to specific sections of the NNNPS in your response.

The NPS supports freight facilities and recognises the need for improvement of facilities including lorry parking. The NPS is also strong regarding consideration of SRFI's and interchange infrastructure required to encourage modal shift from road to rail.

There is a shortage of suitable lorry parking across the South East, for warehousing / storage and for driver rest facilities, partly caused by placing higher value on other land uses. Increased demand for home deliveries has increased the need for capacious and resilient supply chains, including suitably located warehousing and storage facilities, driver welfare facilities, and vehicle depots. TfSE published our Freight Logistics and Gateways Strategy in May 2022 which identifies that increasing provision of lorry parking and driver rest facilities can be explored through adopting different funding and operational models, including local authorities working with the private sector to deliver commercially viable sites.

Specific sections of the NNNPS that support these views include:

2.2-2.4 sets out the importance of domestic freight in achieving our economic goals domestically and internationally and the need to consider freight transport holistically integrating seamless modal interchanges through improvements to infrastructure with multi-modal impacts. This section highlights the importance of identifying the infrastructure needed to support an integrated network that facilitates modal shift, prioritises decarbonisation and improves air quality outcomes, and supports the continuous improvement of the economic efficiency and reliability of end-to-end freight journeys with greater resilience built into the system.

5.280 states that applicants "should recognise the importance of providing adequate lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. The applicant may increase the project's scope to avoid impacts on the surrounding transport infrastructure and improve network resilience."

The Drivers of need for strategic rail freight interchanges section contains significant support for freight interchange infrastructure that encourages modal shift from road to rail. The revised NPS seeks to ensure that SRFIs are appropriately located, and that the operational rail connection elements are brought forwards in a timely manner to enable this to take place.

Strategic Rail Freight Interchanges (SRFIs)

Q10. In your view, are the changes to the SRFI section useful for the NNNPS?

Agree

Strategic Rail Freight Interchanges (SRFIs) reasoning

Q11. Explain why, referring to specific sections of the NNNPS in your response.

The updated NPS appears to have moved away from a position of providing SRFI's based on forecast need to a need for change to support government objectives through provision of SRFIs. This is an improvement and aligns with other policies.

Environmental ambitions

Q12. Does, in your view, the NNNPS adequately address:						
	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
carbon considerations in the development of national networks?				X		
wider environmental targets in the development of national networks?				X		

Explain why, referring to specific sections in your response.

The draft NPS does reference carbon considerations throughout the document, as you would expect given that transport is currently the largest contributor to UK domestic greenhouse gas emissions, and the scale of the challenge to achieve net zero transport emissions by 2050. However, there is a lack of clarity in the document about how trade-offs should be made between the carbon impacts of any national network enhancements and any wider public interest in improving the performance and wider economic contribution of those networks.

DfT's Transport Decarbonisation Plan (TDP) and the Climate Change Committee's (CCC's) 6th Carbon Budget are both referenced, but the main emphasis is on the importance of a rapid transition to a zero-emission vehicle fleet rather than any reduction in overall travel demand or modal shift. .

The document mentions progress to-date in decarbonising transport and at paragraph 2.21 says: "Government's Transport Decarbonisation Plan demonstrates how we will deliver transport's contribution to emissions reduction in line with net zero, much of which has already been delivered or is in progress". Further evidence supporting this would be a welcome addition to the policy.

The references to the importance of climate change resilience and adaptation in paras 3.34-3.37 and 3.67-3.69 are welcomed and further detail on how this will be achieved in practice would also be welcomed.

In chapter five there is reference to how greenhouse gas emissions should be assessed and mitigated in new national network developments, including a whole life carbon assessment. This is welcomed and may be helpful to reference the PAS 2080.

Generic impacts

Q13. In your view, is there any information missing from the Generic Impacts chapter (chapter 5)?
Yes

Missing information for Generic impacts

Q14. Provide comments on missing information, referring to specific sections of the NNNPS in your response.

There should be guidance regarding the potential higher construction costs of designing solutions with lower environmental impacts (although these are often offset by lower long-term operational and whole life costs). The NPS could usefully provide more guidance on how to weigh up delivery cost considerations against wider environment, social and economic benefits of a more sensitive scheme design.

There is no mention of Carbon Net Zero Guidance Note (publishing.service.gov.uk) There are multiple ways that those designing and executing procurements in public infrastructure and construction projects can drive decarbonisation through their approach. This could be by signing up to an environmental or carbon standard for built assets (such as PAS 2080, EN15643, PAS 2035, and BREEAM), through ensuring that they maximise the application of existing procurement policy to do so (such as the National Procurement Policy Statement, PPN 06/21 and the Social Value Model), or by setting ambitious reduction targets at project level for carbon and material use (as HS2, for example, have done).

Appraisal of sustainability (AoS)

Q16. Do you agree or disagree with the findings of the AoS?

Don't know

Habitats regulation assessment (HRA)

Q18. Do you agree or disagree with the findings of the HRA?

Don't know

Public Sector Equality Duty

Q20. Do you think the NNNPS could further support the aims of the PSED, particularly relating to the characteristics protected by the Equality Act 2010?

Don't know

Final comments

Q22. Any other comments?

Transport for the South East (TfSE) is a sub-national transport body (STB), which represents sixteen local transport authorities. These are Brighton and Hove, East Sussex, Hampshire, Kent, Medway, Surrey, West Sussex, the Isle of Wight, Portsmouth and Southampton, and the six Berkshire unitary authorities. Authorities are represented on the Shadow Partnership Board along with representatives from the region's five Local Enterprise Partnerships, District and Borough authorities, the protected landscapes in the TfSE area, Highways England, Network Rail and Transport for London.

TfSE provides a single voice on the transport interventions needed to support sustainable economic growth across its geography. The South East is crucial to the UK economy and is the nation's major international gateway for people and business with some of the largest ports and airports in the country. High-quality transport infrastructure is critical to making the South East more competitive, contributing to national prosperity and improving the lives of our residents.

TfSE supports the need for intervention, following on from the strategy TfSE have published a Strategic Investment Plan (SIP) in March 2023 to help both government and LTA's prioritise investment in our region and make the transition to a net zero network. The packages detailed in the SIP address eight investment priorities aligned with the vision and strategic goals of the TfSE Transport Strategy and the wider regional and national policy context. It provides a framework for investment in strategic transport infrastructure, services, and regulatory interventions in the coming three decades.

The SIP represents the culmination of five years of technical work, stakeholder engagement, and institutional development. It is underpinned by a credible, evidence-based technical programme that has enabled TfSE and our partners to: understand the current and future challenges and opportunities in the South East.

- identify stakeholder priorities for their respective areas of interest.
- evaluate the impacts of a wide range of plausible scenarios on the South East's economy, society, and environment.
- develop multi-modal, cross-boundary interventions.
- assess the impact of proposed interventions on transport and socio-economic outcomes; and
- prioritise the interventions that best address the South East's most pressing challenges and unlock the South East's most promising opportunities.

Strategies should consider journeys and networks holistically to improve transport outcomes. Separating modes into silos for strategic development regardless of collaboration makes alignment and planning for people and their needs difficult.

The packages outlined in the SIP are a step-change from "predict and provide" capacity enhancements of the past. Aligned with our vision and supporting not only strategic movement of vehicles but our places and communities. They have been refined to minimise increases in carbon emissions and impact on the wider environment but there is a need for further mitigation as these packages and interventions develop. Road packages must be complimented by other interventions.

- To promote demand management and digital technology.
- To reduce the number of trips.
- To accelerate the decarbonisation of road vehicles,
- To promote sustainable travel.

The need for decarbonisation is strongly reflected within the TfSE Transport Strategy Vision, which states: "By 2050, the South East of England will be a leading global region for net zero carbon, sustainable economic growth where integrated transport, digital and energy networks have delivered a step change in connectivity and environmental quality. A high quality, reliable, safe and accessible transport network will offer seamless door to door journeys enabling our businesses to compete and trade more effectively in the global marketplace and giving our residents and visitors the highest quality of life." To support this vision, it is important to recognise that:

- Decarbonisation of the transport system is not happening fast enough.
- The South East's transport systems need to adapt to a new normal- i.e., post pandemic, post Brexit environment.
- There is a need to "level up" left behind communities.
- There is a need for sustainable regeneration and growth.