

**Supplementary evidence from John Elliott following hearing ISH 4 Wednesday
6th September and for future hearings in time for deadline 4 on 19th
September.**

Introduction and Summary

I must apologise to the Examination Team for raising other points outside the brief for that meeting. Sorry, while I have dealt with major public Inquiries on east London river crossings and other Strategic Trunk Roads, planning and local scheme public inquiries, I am certainly not familiar with the DCO process. My recent ill health has also prevented me from finding out more about the DCO process before the public hearings while all the deadlines were actually happening.

I wish however to correct one word in my answer of what my questions and statement on 6th September were about – I used the word ‘comment’ in my answer to the Examination team on the various statements about mitigation by all the local authorities. I should have used the word ‘support’. I had not seen any other opportunity to submit oral evidence within my particular expertise of Traffic and Transportation which I had understood was the theme for ISH4. I also covered the traffic delays during construction and statements about reliability and robustness of the scheme made by National Highways at the hearing.

I am also sorry that I did not explain properly the relevance of the various other points I tried to make. Accordingly, this submission attempts to explain the relevance of what I was trying to say.

I have broken down this written statement into 5 headings:

1. Mitigation and the extent necessary if the scheme does go ahead
2. The enormous extra volume of traffic likely to be unleashed by the scheme and the relevance of POPE studies
3. The possibility/likelihood of the traffic delays, during construction, to vastly exceed the design and predictions by NH. The discussion on this item supported the comments by others made at the ISH4 hearing about the construction company finding cheaper or more convenient closures and diversions – (the construction companies have no real interest or incentive to minimise general traffic delays and inconvenience
4. The effect of the needed mitigations and construction delays would have a major effect on the so called economic benefit. The rather dubious assumptions in the modelling and economic analysis. The flaws in the system prescribed by the DfT together with the promoters ability to make many assumptions was previously described in my first Written Representation for Deadline 2 on 18th July (submitted by my son). This included, as an Appendix, supplementary evidence including views on modelling and assessment from the Professional Transport Institutions; this was provided by me for deadline 3 on 24th August. The issues of ‘**Robustness**’ of the economic return and improved ‘**Reliability**’ (of presumably journey times) claimed by the scheme promoters at the ISH4 hearing is also covered in this section 4.
5. Safety and potential accidents with traffic when it comes off the National Network onto local roads

These points are in addition or complementary to my two previous submissions for deadline 2 and 3
Deadline 2:-[https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-002507-DL1%20-%20John%20Elliott%20-%20Written%20Representation%20\(WR\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-002507-DL1%20-%20John%20Elliott%20-%20Written%20Representation%20(WR).pdf)

Deadline 3: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-003620-TR010032%20John%20Elliott%20re%20observations%20questions%20on%20main%20submission%20to%20LTC%20Inquiry.pdf>

I have already stated the Local Government Technical Advisers Group (LGTAG) does not normally comment on individual schemes in our members authorities and my evidence to at least this public examination is from me personally. However with my long term association with LGTAG and its predecessors since the late 1970's, I can confirm that LGTAG has consistently pointed out the problems with Strategic Road enlargements and the NNNPS which, with NH's overriding concern for trying to reduce delays on the Strategic Road network, has spawned the LTC. The submission to the consultation on NNNPS in 2014 from LGTAG (then known just as TAG), demonstrates many of the same points as included in my evidence to this examination. The **Appendix to this statement** shows the reasons and well supported criticisms clearly.

1. Mitigation

All the local authorities at ISH4 were concerned about the necessary extent of mitigation that might be needed to reduce the negative effects on their areas. I can also confirm that this is a major issue for the national Local Authority Technical Advisers Group (LGTAG) not least because of the generous funding of the National Roads programme for 2.4% of the road network. This can be compared with the very small funding available for the 97.6% of the network that is the Local Authorities' responsibility. The fact that virtually all trips have to start and complete their journeys on Local roads is also highly relevant to this position.

South of the River the A229 was the most obvious road enlargement needed for mitigation. From what I understood, Kent CC had had discussions on a £200 million pound scheme for which the largest part would be paid by the Department of Transport; so Kent have to 'only' find a small part. This upgrading would be very necessary to link the extra international and diverted LTC lorry traffic from the M2 to the M20. The grant that the DfT would give (to KCC) for the construction of this scheme would normally come from the pot for all local authority schemes so the total cost of the A229 upgrading should be attributed to the direct cost or mitigation measures for the LTC.

I previously mentioned that the M2 would be the logical route for traffic to access points east including the channel ports. With the lorries mainly on the A229/M20, the encouragement for the large number of extra cars would be to use the M2. The immediate cost of 'mitigation' on the M2 for land and construction for widening of the whole road between Gillingham and Brenley Corner (as new 'smart' motorways are now off the agenda) could be significantly more than £1 billion to add to the cost of LTC.

As mentioned almost all trips start and finish their journeys on the local road network. With the vast number of extra trips (please see next section) having to be handled on the local road network in Essex, Kent and London, local authorities would need to introduce a range of measures to mitigate the effects of the extra traffic. Such measures could include Planned Congestion, Park and Ride, Workplace Parking Levies, Congestion Charges, effective (Green) travel plans and initiatives to improve sustainable modes etc. Such measures would cost the local authorities considerable sums and take a very large increase in resources to deliver. The availability of funding from Council Tax is unrealistic so all or the vast majority of such costs should be assigned to the LTC and should in my

view be reserved and provided by Central Government as needed by the Local Authorities before the approval of the LTC.

2. Scale of extra traffic needed to be handled by Mitigation measures + POPE relevance

In my first Written Representation I referred to work carried out by my team at the GLC in the mid 1980's with particular reference to river crossing results from Blackwall Tunnel dualling. In context this was the furthest downstream Thames road Crossing and perhaps a very good parallel for the LTC recognising that car traffic especially just outside the core of London, or now London as a whole, would not be dissimilar in equivalence in 2020s versus the late 1960s. Experience with the Dartford crossing and the doubling of capacity twice and minor changes using the Congestion Charge system has exhibited the same pattern - exacerbated by the various other NH schemes on the M25 and radial routes feeding it.

Indeed, it could be said that the LTC itself is a 'mitigation' scheme for the effects of the combination of relatively smaller schemes - hard shoulder running, radial schemes feeding the M25 and junction widenings and other schemes around the M25. These in themselves will have generated more demand for the Dartford Crossing and DfT/NH's LTC proposals.

In practice all the major road schemes, studied by the GLC in and around London, exhibited similar findings – peak hour traffic grew within the 1-2 years after the construction, to use all the extra capacity on the new link or up to the capacity (if limiting) of the surrounding links to carry the traffic. All day traffic similarly grew very rapidly before levelling off within about 5 years. As a regular user of other roads that have been completed or widened since the GLC study – the M25 itself, A40 from M25 to Acton, various schemes on the North Circular, A2 from M2 to M25 (I also managed to find some data on the A40 which showed this result - 1500 to 3000 vehicles per hour). I was also involved in a later study (2006) by the Campaign for the Protection of Rural England (CPRE) which demonstrated traffic generation from new roads, albeit generally smaller schemes than those studied by the GLC or indeed than the LTC.

The Standing Advisory Committee on Trunk Road Assessment (SACTRA) 1994 reported on my team's results and Professor Phil Goodwin was a member of the panel for SACTRA's results. I have known and worked with a number of other Professors and other learned academics who have been party to new roads and the generation of extra traffic and, almost without exception, they all agreed that Strategic road expansion would not help. The DfT, through appointed consultants, had some criticisms of our GLC study which were largely disproven by details within the original 1986 study report and by further evidence I produced for the East London River Crossing and Thames Gateway inquiries. (The DfT consultants even stated that the results could be caused by rat running traffic – across the Thames! Incidentally I was not questioned at all on the generation of traffic by New Roads despite 5 days being cross examined!)

With 3 lanes in each direction multiple points leading off and on the LTC each side of the Thames and being a larger scheme than any studied by the GLC, the scope to fill the LTC with up to at least 1500 vehicles per hour for each lane is reasonably likely, so adding 4500 vehicles per hour to the road networks each side of the Thames potentially in each direction. This is truly an enormous scale to be 'mitigated'.

Mention was also made during this ISH4 hearing of the POPE studies that would be carried out AFTER opening. This is too late to find out if the LTC would work as predicted by the scheme

promoter especially when there is a weight of evidence on what is likely to happen from the previous research. I do not believe any of the POPE studies considered a scheme of the magnitude of the LTC.

3. Construction delays

Discussions at the ISH4 meeting included the situation where the construction company can press for additional closures and re-routings to suit them and be more convenient and cost less for them. It is not their responsibility to minimise traffic delays during construction or follow the plans on construction developed by NH. Again, there is a standard method, laid down by DfT, for construction delays to be included in the costs for the 'economic' assessment appraisal – this does not include the extra diversions or probably even the reduced capacity promoted by the construction companies. I did contact somebody in NH on the A249 junction and they confirmed this situation.

I mentioned the works at the M2/A249 junction causing fairly massive delays on the A249, the virtual cutting off of access to Sittingbourne, the Isle of Sheppey and the surrounding area from and to the west and the access from the A249 to the M2 eastwards. I also referred to the signed diversion route eastbound on the M2 adding 21 miles to journeys to these areas – this lasted several months in total. In addition I can now report that on my journey back home from Dorset on Sunday 10th September there was a solid 2 lane queue for about 8 miles where traffic was being diverted into a single lane off the M2 onto the A249 junction. This queue must have taken many hours to clear. Similarly on the way down to Dorset there was a queue trying to turn off the M25 at the A3 junction (more construction works for another revised junction) with a queue of about 1 mile discharging very slowly.

4. Benefit cost ratio

I understand that the benefit/cost ratio for the scheme is presently 1.22 - hardly a good starting point for the '**Robustness**' of the 'economic' return from the scheme as claimed by the promoter at the ISH4 hearing.

The submissions by me on both deadlines 2 and 3 as well as the Appendix to my second submission document providing views from the Professional Institutions (submitted by me for deadline 3) shows, that the so called economic benefits, calculated according to DfT advice, have potential for enormous errors in themselves. My submissions also commented that they were very artificial quantities for the benefits to society. The potential, particularly on assumptions and study area of how the 'economic' costs, feeding into the Benefit:Cost ratio, based largely dubious calculated time savings (turned into pounds), could vary very significantly and even be negative. The economic benefit, is artificially and inaccurately calculated as the difference between the 'do nothing' and 'with scheme' situation

To these errors, both the travel time costs of the diversions etc during construction and the capital and revenue costs associated with mitigation measures would further reduce the benefit:cost ratio to probably significantly less than 1 - based on the (flawed) existing calculation methods.

On **Reliability** Strategic roads by their very nature tend to have relatively few junctions where travelers can come off the Strategic Road and use other routes when there is an incident (cf: the 8 mile queue on the M2 described above). Furthermore, the greater the difference between the

capacity of the main Strategic Road network and other roads, the greater the congestion on alternative routes when traffic does leave the Strategic roads because of the incident.

The lack of willingness or priority given by DfT/NH to introduce network wide reduced speed limits anywhere on the network, whenever the Strategic road is reasonably full, also means that accidents tend to be more severe, again making the reliability worse. The lack of compliance with speed limits and enforcement generally exacerbates this lack of appropriate action. The traffic carrying capacity of a high speed road. Is more unstable. Initially at very high speeds in excess of 70 and sometimes 80mph, drivers accept gaps between themselves much less than the 2 seconds between vehicles - as advised by the DfT. Then when somebody in front just touches their brakes everybody else does, the gaps get bigger the throughput goes down with the larger gaps and lower speeds. Often the traffic comes to a total halt in such conditions and obviously there is more potential for accidents.

Reliability of journey times is probably the most important issue for all road users. Journey times in peak hours, which presently makes up the largest part of the 'economic evaluation' is much less important and indeed many authorities in the UK and elsewhere deliberately introduce measures to increase car travel times especially during the peaks.

As a regular user of the southern, eastern and northern parts of the M25, my experience of Dartford crossing is that very long delays are not that frequent (I have though experienced one occasion when the bridge was closed because of high winds). Normally the approach towards the Dartford tunnel continues moving at perhaps 30-40mph. As I mentioned at the ISH4 hearing my overall experience of using the M25 is that 1 in 3 journeys covering over 90 degrees of the M25 is delayed by 40 minutes or more. This can be anywhere around it. This is a common experience amongst friends and neighbours I speak to. From such experiences the LTC will have little value in improving overall reliability of the M25 or the NH network as a whole, let alone whole journeys.

5. Accidents when traffic leaves the Strategic Road network.

The promoters also claimed safety benefits from the scheme. As a general point this *may* possibly be true for the Strategic road itself but when such traffic disgorges onto the local road network there is much potential for serious accidents when drivers don't realise how much they have to slow down. It is usual on French motorways to have reduced speed limits in stages at junctions before entering the local roads (or toll booths). As reported at the hearing, Westminster City Council's experience of many accidents at the junctions leaving Westway was a good example.

I must apologise to the Examination Team for submitting yet more fairly extensive evidence. However as I described in my Introduction to my first Written Representation with my background I hope that such evidence will aid understanding of the major negative impacts of NH's proposals. I hope this further submission will be helpful to the Examination Team and I would be delighted to answer any further questions on these or other traffic and transport planning issues.

JE 18-09-2023.

Please see Appendix below

Appendix to John Elliott's written submission 18-9-2023 to examination in Public of LTC



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National Networks National Policy Statement Consultation

Zone 3/23 Department for Transport

33 Horseferry Rd

London SW1P 4DR

22nd February 2014

Dear Parliamentary Under Secretary, Secretary of State, other Ministers and Senior Staff of Department of Transport

DRAFT NATIONAL POLICY STATEMENT FOR THE NATIONAL ROAD AND RAIL NETWORKS (NN NPS)

1. Introduction

1.1 As you may be aware TAG represents a large number of local authorities in the country, these include those with highway and transport responsibilities; such as Transport for London, most London boroughs, Metropolitan authorities, Unitary authorities, consultants providing highway and transport services for major local authorities and many of the districts and towns in two tier authorities. While 'second tier' authorities do not have direct

responsibility for transport, they do have a major role in looking after significant towns and the sensible overall planning of them including providing a reasonable environment and trying to ensure, through the Highways and Transport Authorities, that the transport system is fit for purpose. Overall we represent over 100 different authorities. Thus for any technical or professional group you are consulting on the NN NPS, we believe we are the most effective representative organisation likely to have a technical as well as public view on any policy issues.

1.2 TAG was first created as a joint officer body to coordinate across the various areas of Local Government and was formed by an amalgamation of the Associations of London Borough Engineers (ALBES), Metropolitan District Engineers (AMDE), Chief Technical Officers (ACTO) of the districts in two tier areas; One of the major reasons for this combination was so that advice to the new combined Local Government Organisation could come from one body. TAG still have a major role in advising the LGA and recent submissions from the LGA on transport issues usually reflect TAG advice.

1.3 We also confirm that in the preparation of this response we have sought the views of all members (and associates involved with our National and London Transport Committees) engaging with our members both before writing our submission and again with the draft version of this submission.

1.4 TAG thanks the Government for the opportunity to raise issues and views on the NN NPS and is particularly concerned that as it stands it is not an effective basis on which to promote or assess national or local policies or strategies on development, planning or transport investment or spending. TAG would also like to draw attention to its previous response on Action for Roads and Jessica Hunt of the DfT's response which did not address our fundamental points. In particular our concluding comments in our response stated:

"To conclude we would ask the Department, Ministers and indeed the Treasury to consider strategies for the whole of Transport and Communications and then Roads Network in an integrated fashion and ensure that strategies for 2% of road network supports a common strategy with the other 98% of the network where all vehicle trips begin and end.

While we do have regular meetings as a Group with DfT officials John Dowie, Graham Pendlebury and Tricia Hayes, we would be more than happy to discuss these issues with Ministers and other Officials of any Government Department."

We confirm for this consultation we are more than willing to provide additional information or meet with officials or Ministers to explain in detail our views and reasons.

1.5 Much of the future of Transport, Planning and the environment and the economy depends on making sure the NN NPS is likely to deliver the right outcomes. Our overall views on the NN NPS as presently written are that it appears to be:

- based on a number of false premises not based on evidence;
- not integrated for planning or whole journeys

- strongly influenced by effective lobbying from a business sector with strong vested interests in future strategic transport studies and the construction of major new infrastructure.

It is incumbent on us as professionals in public service to explain the consequences of different strategies and to be open to discussion.

1.6 Unless the NN NPS is substantially rewritten we believe there could be serious adverse consequences for many communities and substantial sums of public money will be wasted. In particular it is made clear in para 1.4 of the consultation document that an objective of the 2008 Planning Act combined with the NN NPS is to 'remove the need for lengthy planning inquiry consideration of fundamental questions at the application stage'. While on the face of it this would seem a desirable outcome but only if the NN NPS is a really sound evidentially based document. Some major historical schemes, which would have been built without effective scrutiny and strong objections at planning inquiries, are London's Ringways and Archway Road widening - very few people would now suggest that they should have been built.

2. General comments on contents of NN NPS

2.1 We have not repeated our August submission on Action for Roads but almost all the points made in that submission are still highly relevant and still stand for this consultation (we have attached it again for consideration as part of our response).

2.2 While we have concentrated on Roads issues, as a strategy for the 2% of the network that are National Roads, a sensible NNNPS cannot be considered at all without consideration of workable strategies for the other 98% of the network where at least 99.99% of all road journeys must begin and end. TAG members and associates of course have very substantial responsibilities for the effective management of this 98% of the road network. Nevertheless we do have some strategic comments on public transport networks and Strategic Rail Freight Interchanges as follows:

- outside London the vast majority of the rail network is presently the responsibility of the government and is funded by government or individual fare payments – TAG therefore has a much more limited role;
- as for vehicular traffic on the roads, almost all rail journeys will be dependent on local public transport, foot, bicycle, taxi or car to complete the whole journey;
- TAG as an organisation has not taken a particular stance on the most major rail expenditure - HS2, but is concerned that the ends of each rail trip (see bullet point above) need to be considered properly in any national rail network strategy and not constructed at the expense of local transport investment
- The transport strategy for buses is fundamentally important for the economy and, outside London, even with the provisions of 2008 Act, such a strategy is substantially wanting (and difficult) since the 1985 Act. (It is notable that in Appendix F to the NN NPS page 5, it is stated that household access to key services and work have declined in both urban and rural areas in recent years. Normally this accessibility can only be addressed by improvements to buses, bicycles, foot and perhaps car share not by improvements to the main road or rail systems.)

- TAG supports development of the National Rail Network, recognising the benefits which can be delivered particularly in terms of reduced road traffic demand on the National Road Network and reduced need for air travel. Funding, however should not be delivered at the cost of local investment in transport networks. We also support in principle the Strategic Rail Freight Interchange (SRFIs) Policy in the NN NPS however the need case, in planning terms, would benefit from stronger definition in order to assist planning permission for suitable sites.

2.3 We note the ‘Government’s vision and strategic objectives for the national networks’ (these appear in para 2.2 of the consultation document and at the beginning of Chapter 2 of the main draft NN NPS) and with relatively minor changes these could be adapted to meet government and local government transport objectives throughout the whole networks. (Please note that in our response on Action for Roads we did suggest that an Integrated Transport Policy was required for the nation before any specific part of the network). Suggested additions or changed wording for the objectives are shown below marked in red italics (note some words have been replaced with others providing a fairly similar meaning which we hope the government may find acceptable):

“The Government will deliver *with its partners* national networks that meet the country’s long-term needs; supporting a prosperous and competitive economy and improving overall quality of life, as part of a wider transport system. This means:

- Networks with the capacity and connectivity to support national and local economic activity and facilitate growth and create *long term* jobs (*note - not jobs just during construction*)
- *Management of* networks *to* support and improve journey quality, reliability and safety
- Networks which support the *quality of the national and local* environment and the move to a low carbon economy
- Networks which *provide reasonable access for* our communities *to services and jobs* and link to *other communities and facilities.*”

2.4 Also at the beginning of Chapter 2 of the draft NN NPS the need is explained starting with the assertion that ‘Transport is an engine for growth’. While reasonable transport and communication systems are required to support any economy, there seems little justification in this particular choice of words. Excessive transport system provision or excessive use particularly of the private car is likely to do more harm to the local and national economy (please see our response to Action for Roads and an Appendix we submitted to the House of Commons Transport Committee on this subject).

2.5 It is also noted that on the same page in Chapter 2 the Eddington report is used to support the Government’s view contained in the draft NN NPS ‘Well-connected and high-performing networks with sufficient capacity are vital to meet the country’s long-term needs and support a prosperous economy.’ It is notable that Eddington identified that 89% of the congestion was in urban areas and that almost a prerequisite to reduce congestion was road or congestion pricing.

2.6 TAG has on a number of occasions recognised the political difficulties of introducing road pricing but surrogates are available to government to encourage more sustainable travel to meet an identified need to reduce congestion. Such surrogates include: affordable bus and rail fares, supporting proper charging of car parking for all spaces, ensuring appropriate parking standards for new development rather than maximum affordable levels of provision, active support for travel planning, changing the rating system to discourage parking provision especially for out of town centres etc.

2.7 Strategic road capacity increases, without even stronger methods to encourage sustainable travel, will exacerbate congestion in the most congested places and not deliver the Governments stated vision and strategic objectives for the national networks let alone improve overall journeys for people and the economy.

2.8 While we are certain that the policy and strategy on increasing the capacity of the Strategic Road network in most places is seriously flawed, village, town centre and small town bypasses, providing they do not encourage more car commuting, have their place particularly as a part of a strategy for improving the environment for communities. Similarly new access roads (and public transport, cycle and pedestrian networks) are required for access and regeneration of brownfield land and to support the local and national economy.

2.9 We hope we have demonstrated above, combined with our attached submissions, the urgent need to fundamentally review the NN NPS. TAG would be very pleased to help in such an endeavour. We have below attempted to answer the specific queries in the consultation document.

3. TAG Response on specific consultation questions

3.1 In this section we have endeavoured to answer the somewhat leading questions included as part of the consultation document in the context of the serious shortcomings of the NN NPS, as presently drafted, as explained above.

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

3.2 No, in so far as there is too much road traffic and congestion adversely affecting business and people on the networks, the government might have identified a need for better management of the whole network and in some cases for additional infrastructure provision especially in regeneration areas but not the need for Trunk or strategic road enlargements.

3.3 TAG recognises the need to effectively manage the National networks as part of the Transport networks for the country as a whole. The use of National Traffic Forecasts to continue (or revive) a policy of predict and provide is seriously flawed. In particular the London situation shows the forecasts to be grossly misleading.

3.4 The potential demand for increased travel is possibly true but a predict and provide model, even for trunk roads, is highly undesirable. The scale of growth projected for the strategic national road network (para 2.6) of 46% can only mean much more congestion than at present even with a vastly increased programme of strategic road building. The necessary accompanying growth in traffic on the local road networks to achieve the predicted overall growth of 42% cannot in any way be accommodated in urban areas. The opportunity to increase access capacity on to the strategic road network from the local road network is severely limited.

3.5 We do agree that there is a compelling need for development of the national rail network, recognising the benefits in terms of traffic reduction particularly on the strategic road network. We also support in principle the need for Strategic Freight Interchanges as a means of increasing the transfer of freight from road to rail but consider more guidance is required regarding the scale of demand and how such proposals are to be brought forward. We are however mindful that if it is to be successful, investment in national networks will need to be matched by corresponding investment in local transport.

3.6 A further key factor is the need to make the networks more resilient, major parts suffer all too often due to the effects of weather which are becoming increasingly frequent. This appears to be an omission.

3.7 The potential benefits to be gained by improved efficiency and resilience appear understated. Poor performance due to delays and cancellations of rail services for example, not only add directly to congestion on the rail network but deters use of rail exacerbating demand on the road network, particularly national networks.

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?

3.8 No, the policy/strategy for roads will not deliver the sort of improvements required to help the economy or improve the lives of the people.

3.9 A policy which focuses on investment in national networks to increase road capacity will not succeed in dealing with congestion, will be detrimental to local environments, and increase CO2 and other pollutants as explained in section 2 and the other attached submissions.

3.10 In part the answer is provided in Para 2.8 above - increased investment in public transport as part of an integrated transport policy can continue to contribute significantly towards traffic reduction and consequential reductions in congestion. However, a fundamental alteration in the direction of land use planning and economic investment is required to deliver successful and sustainable growth in the economy, that is one which delivers growth in urban areas.

3.11 The current direction of land use and economic development policy threatens both the environment and the economy in the longer-term by guaranteeing a level of traffic growth the capacity for which we cannot meet either environmentally or financially.

3.12 Investment in road transport would be better targeted to deliver economic growth within urban areas, providing access and capacity to redevelopment sites and investment in public transport.

3.13 In some locations it is clear that investment in the local transport network can relieve traffic on the national networks and it has been the skewed capital investment towards the trunk road network which has, particularly in the regions, contributed to the higher levels of traffic on the national road networks.

3.14 It is deeply concerning that phrasing of the document (para 2.18 and 2.2) belittles the benefits of investment in non-car based modes of transport; the often modest investments in such sustainable transport initiatives can yield significant benefits particularly when applied as part of integrated policy framework. The political decision not to use road pricing as means of demand management is noted. We would however draw attention to potential surrogates for road pricing as shown in our para 2.6 above.

3.15 The environmental (and health) impacts of increased road traffic capacity cannot be ignored and have been highlighted recently by the consequential inability to deliver managed motorway projects in key locations. Consequentially a policy solution reliant upon increased capacity is unlikely to be deliverable and indeed it is the most congested parts of the network where such environmental problems are likely to be greatest. The term “smart motorways” in this context appears particularly inappropriate as the environmental outcome is anything but smart!

3.16 It is suggested (para 2.24) that rather than meeting the demands of unconstrained growth it is intended to increase capacity on the national road network to support economic growth and connectivity. However, it is far from clear given the reliance of the NN NPS on the traffic growth projections, which are themselves driven by economic projections (and past trends), how this will be the case. It is also disappointing that there is only a possibility that improvements which deliver improved safety, environmental enhancement and better accessibility for pedestrians and cyclists will be brought forward; we would expect such schemes to form part of a formal programme of investment.

3.17 Regarding rail, overcrowding needs to be addressed and although it is clearly most extensive in London and the South East, the rate of growth in other areas including long distance is outstripping current capacity. Additionally, the continued growth in rail freight, which is welcomed, is in itself increasing capacity demand often in competition with increased passenger service demands.

3.18 A clear investment plan for rail must therefore form a key part of an integrated approach not only to transport investment but also importantly for economic growth. It is noticeable that strongest historical growth reflects investment patterns and the opportunity to increase regional rail passenger growth potentially offers the greatest financial return, simultaneously reducing the demand for ongoing revenue support. However, investment in High Speed 2 should not be seen as limiting factor in terms of transport or rail investment.

3.19 In principle we support the proposal for the development of Strategic Rail Freight Interchanges but believe more clarity is required regarding scale of demand and implications relating land use policies.

3.20 It is disappointing that the Department appears to be reliant upon EU legislation to deliver reductions in CO2 and not take a more proactive approach. The uptake of electric vehicles has been significant but “range anxiety” remains a key identifiable barrier; here the DfT could assist by securing the delivery of a comprehensive network of charging points serving the major road networks.

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?

3.21 They do not as explained in our whole submission and as below.

TAG have challenged the assessment principles embodied in the Department’s methods for many years. Much of our reasoning from our submission to NATA refresh in 2008 (attached for convenience) still holds.

Briefly we consider:

- Schemes should not even be considered, let alone need to get to an assessment process, unless they meet reasonable national and local transport objectives; we would hold for the reasons above that there will be very few occasions when trunk road schemes are likely to meet such reasonable objectives.
- The present methodology is too complex, opaque and not adequately useful for the real politician decision maker.
- The seeming importance of a flawed cost benefit analysis method seems to carry a disproportionate weight in the overall assessment.

- Within the 'economic assessment' process there are the following major issues:
 - The evaluation is largely based on the difference between two enormous sums of time spent on the network with and without a scheme; each of these sums is based on a large number of assumptions, the process is therefore mathematically very unsound.
 - For major road schemes most of the 'benefits' appear for the peak traffic times (ie largely for car commuting – a mode and time that most highway and planning authorities do not want to encourage) and for the period 30-60 years in the future (where the assumptions taken have even less accuracy).
 - The impact of 'generated' traffic compared with so called 'natural traffic growth' and their impact outside the proposed scheme is never adequately considered.

3.22 TAG accepts that there are some useful principles in the assessment methods but there is much work to be done before the methods are really useful. The recently published Post-Opening Project Evaluations completed for the Highway's Agency, highlight concerns relating to the forecasting of scheme benefits which are fundamental to the economic assessment of a project.

Q4. Does the draft NN NPS give appropriate guidance to scheme promoters? If not why not?

3.23 The draft NN NPS does not give appropriate guidance but we would also suggest there may be developing flaws in who the 'scheme promoters' are.

3.24 On the understanding of other recent consultations, the government is considering that the 'scheme promoters' are likely to be arms-length organisations given an overall brief to deliver schemes rather than address real public objectives or solve real problems. As a prerequisite scheme promoters need to demonstrate that they are publicly accountable and democratically responsive to real public needs.

3.25 Furthermore there is no guidance to the promoters on alternative methods, and funding, for alternative strategies to meet reasonable objectives or resolve specific problems. At the least the Highways Agency organisation, for example, should be directed to work with other transport organisations to deliver other workable measures and strategies. These should include: support for area wide travel planning, enhancements and support for local public transport, park and ride, support for a local congestion charge or workplace parking charge schemes, bus and high occupancy vehicle lanes on the local and trunk road networks etc.

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?

3.26 It is noted that a number of organisations were consulted on this work however TAG was omitted.

3.27 Our reading of Appendix F suggests that quite a wide range of potential impacts has been considered but only three alternatives have been considered as packages. No alternative has been chosen to include the best parts of each package (e.g. why does not the less environmentally unsound Alternative 1 consider ULEVs?).

3.28 Without doing a full critique even of this document let alone a review of the more technical work there are major flaws, for example:

- i. In the first 'Roads' bullet point of section 2 it states that the government policy is 'reduce congestion and unreliability by focusing on improving and enhancing the existing national road network' - as explained above reducing congestion will not be achieved by this method and reliability will also be made worse. TAG would strongly support efforts to improve journey reliability but this would normally require different solutions to even congestion reduction.
- ii. In section 4 table 1, air quality is considered purely from a pollution concentration aspect. The baseline should refer to the approximately 30,000 people who die annually from poor air quality. While this is of less significance for rural trunk roads it should form a fundamental part of the total strategy for transport
- iii. In Section 6 table 3 the impacts of the three alternative strategies are considered, while these have been assessed by 'Professional Judgement' in the AoS it would appear that the judgement has not been fully impartial often the NN NPS seems to be no worse than alternative 1; this is surprising!
- iv. The vast majority of the AoS impacts would be best met by traffic reductions and policies to deliver that.
- v. It is notable that item 21 in the list of AoS impacts is certainly not being helped by the present introduction of traffic light controls on access to the Trunk Road network

Q6. Does the draft NN NPS give appropriate guidance on appropriate mitigation measures? If not why not?

3.29 As explained above TAG do not believe there will be many locations where significant capacity increases are desirable on the Trunk Road system and therefore we do not have strong views on mitigation. However we would like to add where the local environment is worse than reasonable acceptable limits (e.g. air quality next to some major trunk and non trunk roads) no amount of mitigation will solve the problem and alternative strategies should be developed.

3.30 Mitigation for rail and freight transfer stations would be absolutely essential

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

3.31 Please see our answer to Qu 5 above.

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

3.32 TAG believes the NN NPS is fundamentally poorly conceived.

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

3.33 Please see sections 1 and 2 of our response

4. Concluding comments

4.1 TAG apologises if its response is somewhat critical of an honest effort to produce a National Network National Policy Statement but it considers so much is wrong with the starting point for this Statement that it would be very damaging for the country and its people without a fresh start.

4.2 TAG would be pleased to contribute to a new version and would also be more than willing to explain any consequences of policy options to any national or local politicians.

4.3 Please do not hesitate to contact me or other TAG colleagues if you require further information, explanations, meetings etc.

Yours sincerely,

Martin Sachs

Secretary to TAG National Transport Committee on behalf of the Local Government
Technical Advisers Group

Attachments / Appendices as part of this submission:

Response to government on Action for Roads Aug 2013

Appendix to evidence to HOCTC Oct 2013 on Strategic Roads

TAG submission on NATA refresh Feb 2008