

M3J9

Response to REP4-036

The applicant's document 8.15 Appendix A on ISH3 18 August 2023

Winchester Action on the Climate Crisis

This appendix appears to be a response to EXQ1 Q4 1.2:

Q4.1.2	General Assessment principles The Applicant	The ES Chapter - Chapter 3: Assessment of Alternatives [APP-044] paragraph 3.4.1 makes reference to NPSNN paragraph 4.27 which states that all projects should be subject to an options appraisal, which should consider viable modal alternatives and may also consider other options. The NPSNN Accordance Table [APP-155] in relation to NPSNN paragraph 4.26, confirms that the Proposed Development has been subject to a full options appraisal process. Please explain whether any consideration has been given to viable modal alternatives and other options in this case, and if these alternatives have not been considered please explain why that represents a reasonable and proportionate approach.
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1 Summary

A brutally direct short paraphrase of the applicant's response (including what is hidden between the lines) would be:

"There is a lot we want to say about court cases that have little relevance to this question. We surmise we would have done a full appraisal process on viable modal alternatives but we are not offering any details, nor any explanation of why it was reasonable and proportionate to dismiss the rail freight option, and to dismiss the option to develop active travel and public transport facilities in the Winchester area. As a substitute for the missing details of our appraisal process we will repeat our conclusions several times (1.3.6 to 1.3.10)."

We do not believe the applicant has addressed the ExA's concerns.

2 Fundamental contradiction

The applicant appears to be suggesting that full appraisal of alternative modes of transport took place early in the process and that the option to develop alternative modes was responsibly abandoned.

This is especially surprising because a decision not to pursue the development of alternative modes would have directly contradicted the applicant's policies on [Solent to Midlands Route \(nationalhighways.co.uk\)](https://www.nationalhighways.co.uk) National Highways **policy for the Solent to the Midlands corridor**. Objective D (p 83) encourages:



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“access to freight-based multimodal interchanges in addition to recognising the importance of lorry parking facilities in strategically important locations for freight and logistics, particularly Southampton, Portsmouth and the wider Solent Freeport [with a view to achieving] **improved access to holistic rail freight options at the ports with more freight moved by rail than on the roads.**”

Similarly objective H of the route strategy (p 87), states:

We aim to encourage connectivity to and from Southampton and surrounding cities and towns, including Portsmouth and Winchester, through improved integration with sustainable traffic modes to benefit local residents, with the following intended outcomes:

- Improved integration and connectivity between the SRN and sustainable options
- Reduced traffic on the SRN

Implemented together these two objectives could obviate the need for the project.

A decision to go against national highways policy would surely not have been taken lightly, and, if the appraisal had taken place, details of the appraisal process carried out would be readily available to demonstrate that the M3J9 team had taken a reasonable and proportionate approach.

This is all the more surprising because the appendix claims in para 1.3.4 “the Applicant again confirms that the Department for Transport would have considered alternative modes of transport before including the Scheme within RIS. RIS 1 was informed by a robust body of evidence including the Route Based Strategy (RBS) studies and was underpinned by the DfT’s National Transport Model (NTM). The NTM is a multi-modal traffic model that forecasts travel demand bottom up using highly disaggregated input data.”

This means that the appraisal was based on the very same piece of work (RBS Studies) that resulted in the formulation of objectives D and H of the Solent to the Midlands National Highways Policy. It is simply not credible that the same piece of work could have resulted in such diametrically opposite conclusions.

3 Careful equivocation

Closer inspection of the tone and wording of the appendix reveals that the applicant is not providing any direct evidence that the alleged appraisal took place. The key use of a conditional auxiliary verb indicates that the applicant is not sure, and that the applicant is surmising (perhaps hoping) that something of the sort happened. The tautologous logic seems to be that the applicant always follows procedures and that therefore all procedures would have been followed.

No concrete evidence of the extent or nature of the appraisal is offered to back this up.

In section 1.3, while descriptions of conclusions use simple tenses, the key reference to appraisal is hedged with a conditional auxiliary verb:

- 1.3.4 the Department for Transport **would have** considered alternative modes.

We cannot tell from this appendix whether the conclusions, described in some detail, are proportionate or reasonable. There is the worrying possibility that they were arbitrary and mistaken, or that they evolved organically through the stages of the project without being firmly anchored in a rigorous appraisal culture.

4 No specific details

To provide an answer to the question posed by ExA we need detail on what the alleged appraisal(s) considered and how they moved to their conclusions. In particular whether they considered:

- Potential availability of spare rail freight capacity
- The ratio of Solent to Midlands rail to road freight traffic
- The relative costs of expanding rail and road freight capacity
- The potential of recent and current improvements to the Solent to Midlands rail route (capacity increase at Southampton, grade-separated junction at Reading West, capacity increase at Oxford, new rail freight route between Oxford and Milton Keynes, rail-connected inland ports at several central UK locations)
- The extent to which modal transfer of freight to rail will free up capacity at M3J9
- The lower emissions of carrying freight by rail and how this could reduce the greenhouse gas emissions of road traffic through M3J9
- The lack of any technical solution for decarbonising HGV vehicles on long-distance journeys
- The potential for electrifying the whole rail route from the Solent to the Midlands (carbon reduction, noise reduction, capacity increase, energy security)
- The impact of traffic reduction required by the government's Carbon Budget Delivery Plan and the relative contribution to reduction of greenhouse gas emissions
- The establishment of a transport interchange at Winchester Railway Station
- The potential for reducing M3 car traffic between Basingstoke and Southampton by introducing more frequent all-stations train services

- The potential for reducing car traffic on A34 and M3 by introducing a regular bus network across Winchester District.

In a constantly evolving context for this scheme there is a case for re-running any earlier appraisal to take account of new circumstances. Similarly. If no account was taken of a high proportion of these factors, it would be appropriate to re-run the appraisal.

5 Curiosities

In the description of the conclusions of the alleged appraisal there are a number of clues that the appraisal was of a really poor quality.

Para 1.3.5 implies that congestion at M3J9 can only be resolved by road building “A key finding from the M25 to Solent RBS study was that congestion at M3 Junction 9 was hindering freight movements and could block further economic growth at the Port of Southampton. This assessment has subsequently been validated in the 2021 Solent to Midlands Multi-Modal Freight Strategy which highlights congestion at Junction 9 as a problem and supports its improvement.” This fails to recognise that congestion could be reduced if port-related freight traffic were to be transferred to rail.

Similarly para 1.3.5 does not understand this potential of modal transfer of freight to rail: “The report identified that the local highway authority, Hampshire County Council, had identified in their studies that infrastructure improvement was necessary to reduce congestion levels and assist strategic movement of traffic at key arterial intersections in order that economic growth is not compromised.”

Paragraph 1.3.7 does not seem aware of DP World’s determination to move freight to rail: “The report found that freight traffic to and from the Port of Southampton is a main source of strategic movement and reducing congestion across the junction is an integral requirement to ensure that growth is not compromised.”

Paragraph 1.3.8 has an unfounded assumption that rail is less suitable for freight than it is for serving new housing developments.

Table 2-1 seems full of unfounded assumptions:

- Item 1 reveals that the project naïvely overlooks the potential for modal transfer to rail in reducing congestion at M3J9: “Rail improvements would have very little impact on the local/regional economic growth as the journey time through junction 9 for freight movements between the strategic ports and airports would not be addressed.”

- Items 3 and 4 similarly unjustifiably dismiss the congestion reduction that would result from modal transfer of freight and local passengers to rail.
- Item 5 does not consider the possibility that bridleways and cycleways could be improved irrespective of whether the road junction at M3J9 is rebuilt completely. This would certainly be a preference for Cycle Winchester and is the approach adopted in Wales.

Paragraph 1.3.13 is fundamentally incorrect. It quotes national modal splits for freight as a way of justifying a road solution (rail freight increase of 50% would reduce road freight by 7%). The modal split for goods traffic to and from Southampton Port is approximately 30:70% rail to road. This means that a 30% increase in the former (the DP World target) would reduce road traffic by 14%. The modal shift ratios will be highly context sensitive.

6 Conclusion

If these statements are the results of appraisal and are indicative of the rigour of it, then it certainly needs to be done again, more competently.

Phil Gagg, 22 September 2023