railfuture

Promoting Britain's Railway for Passengers and Freight

Policy Directorate

National Networks National Policy Statement
Consultation
Zone 3/23
Department for Transport
33 Horseferry Road
London
SW1P 4DR

Please Reply to:
30 The Mount
Worcester Park
Surrey
KT4 8UD

Tel: (020) 8394 0675
E-Mail: norman.bradbury@railfuture.org.uk

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Dear Sirs,

RAILFUTURE RESPONSE TO THE CONSULTATION ON THE DRAFT NATIONAL NETWORKS NATIONAL POLICY STATEMENT

Railfuture is a national voluntary organisation structured in England as twelve regional branches, and two national branches in Wales and Scotland. We are completely independent of all political parties, trades unions and commercial interests, funded almost entirely from our membership. We campaign for improved rail services for passengers and freight. Whilst pro-rail, we are not anti-car or aviation.

INTRODUCTION: Railfuture strongly supports the idea that road and rail networks should be integrated and regarded as essential parts of a whole, rather than isolated as seems to be the case at present with railways seen more as a business while roads are seen as a public necessity. Both are priceless national assets and both provide essential public services. In the same way, we would suggest that funding for investment is treated as the same for both road and rail with most major projects being funded by the public sector, noting that interest charges for private sector funding for rail enhancements is now costing Network Rail over £1.2bn per year with Government Loan Guarantee fees of at least £200m in addition, thus generating the need for subsidy. A level playing field would see the Highways Agency being required to borrow from the banks to fund such projects as the M25 widening and the costs being passed on to road users.

We also note that tax regimes for road and rail differ with many such taxes appearing since Privatisation, making cost comparisons with British Rail impossible. Indeed, Network Rail claim they now pay 19 different taxes including indirect taxation.

DETAILED COMMENTS:

Q1 *Does the draft NN NPS clearly establish the need for development of the national networks?*

We agree that the draft NN NPS does establish the need for development of our national networks. However, we are mindful of the previous studies on this subject carried out by Sir Rod Eddington, the numerous Multi Modal Studies carried out by the previous administration, and the SACTRA (Standing Advisory Committee on Trunk Road Assessment) report from 1996.

The lessons from these were that better use of existing infrastructure should be made before embarking on new large projects and that new road building should go hand in hand with demand management so

that congestion relief was not nullified by induced traffic (currently, induced traffic is masked by the recession which began in 2008 and it should not be assumed that this phenomenon will not recur at some point in the future).

It was also made clear that investment should be focussed on improving links to our international gateways such as major ports and airports. This is particularly important for rail links where the private sector rather than the public sector is expected to fund improvements. For example, the rail link to the UK`s largest container port at Felixstowe is only single track, and with 30 freight trains each way per day already serving the port in addition to local passenger train services, there is no spare capacity to expand rail cartage unless the railway is provided with a second track but the port owner is expected to pay for it. By contrast, if this were a road the cost of widening it would be publically funded.

Q2 *Does the draft NN NPS adequately explain the Government`s policy for addressing the need set out in the NN NPS?*

We agree that the draft NN NPS does adequately explain the Government`s policy for addressing the need as set out in the NN NPS. However, we would express some concerns about Government policy in this context as follows:

While new or improved transport links can indeed facilitate economic growth and enhance competitiveness, they can also have a negative effect on local economies if they are not themselves also competitive. Transport links have a two-way effect and can suck economic activity out of a region just as easily as they can deliver benefits. This point was made clear in the SACTRA report and by a more recent report by Prof John Whiteleg into the effects of aviation on the economy of the northwest.

A prime example of this is the annual £18bn aviation tourism deficit (the difference between money taken out of the UK in search of cheap holidays in the sun shine and the amount spent by visitors to the UK). This is made possible by the advent of cheap flights, no doubt aided by tax benefits accorded to the aviation industry. In addition, it has been suggested that this largely one-way traffic is responsible for approximately one million job losses in the UK tourist industry.

Rail capacity enhancements are carefully planned and managed so that congestion is not exacerbated by introduction of additional services whereas road capacity enhancements are currently not managed, allowing the new capacity to fill up with induced traffic (see note above). This in turn could increase congestion in town and city centres, potentially making matters worse. Improving road links between towns does not in itself enable town centres to accommodate increased traffic. We are reminded that a previous grand scheme to eliminate traffic congestion on roads leading into central Manchester by building four new arterial roads with a combined capacity for 32,000 vehicles per hour was scrapped when it was realised that parking space totalling 69 hectares would be required in Manchester just to accommodate **one hours** worth of traffic.

Clearly, road capacity enhancements will need to include demand management through a charging mechanism, ideally a form of road charging which will be needed in any case to replace existing road fuel taxes if use of low carbon electric vehicles grows significantly in the years to come. A road charging mechanism could also be used to control peak demand and take account of environmental considerations.

We would therefore caution against expansion of the road network except under exceptional circumstances where such expansion rather than demand management is the only way to address congestion. Journey time reliability is more important than theoretical journey time savings.

Q3 – Q8 We have no specific comments to make with regard to these questions.

Q9 ***General Comments:***

Whilst there is little evidence (Source: Atkins report) that induced traffic has featured among recent road capacity enhancement schemes, this phenomena is no doubt related to the general fall in road traffic caused by the current economic downturn which began in 2008 and it should not be assumed that

induced traffic will not occur again as the economic climate improves. However, we also note other emerging trends which suggest that road traffic growth is unlikely to return to the levels seen in the past and is most likely to be related to population growth rather other causes.

ANNEX A

Para 2.8 Although it is acknowledged that road traffic has declined recently due to high oil prices, other factors to be considered relate to changes in employment as manufacturing in the UK has declined and employment has shifted to city centres thereby increasing commuting by rail. Oil prices, although stable at the moment, will rise again as the world recession eases and this will also have a restraining effect on traffic growth. Most importantly, it has emerged that over one third of young people under the age of 26 do not hold a driving licence and this trend appears to be increasing. It is also known that once people get accustomed to life without a car, they are prone to continue to do so, thus heralding a potential change in social behaviour.

All this has serious implications for public transport and rail in particular and we suggest that Department for Transport predictions for road traffic growth of 42% by 2040 compared to 2010 levels should be further revised downwards. We note that due principally to the recession, road traffic declined overall by 3.5% between 2007 and 2010 but traffic growth had also slowed before the recession kicked in.

Para 2.12 Whilst we agree that transport must be decarbonised as much as possible, we do not share the Government`s optimism that ULEVs in the form of electric vehicles will be adopted in significant numbers until battery technology has advanced sufficiently to provide the energy equivalent of a tank full of diesel within comparable price, volume and weight. Apart from price, the most important factor holding back take up of electric vehicles is the poor range available from a full charge. The internal combustion engine will therefore dominate car production for the foreseeable future.

Furthermore, given the on-going closure of coal fired power stations, we would question the country`s ability to generate sufficient power to enable replacement of the motor fleet with electrically powered vehicles and significantly greater investment in renewable power generation in all its forms, not just wind turbines, will be required to meet carbon reduction targets.

Para 2.16 *Alternatives to control road traffic:* Road traffic growth is encouraged by annual fixed charges for such things as Vehicle Excise Duty (VED), insurance, MOT & servicing. There will be a natural tendency for motorists to forget these payments once made and they are then not perceived to be part of the cost of a journey by car, indeed, they encourage travelling further to maximise value for money. Payment for these items at point of use, including road charging, would make the cost of journeys by car more visible and comparable to rail journeys. Trials with insurance charged per mile carried out some years ago in Canada clearly demonstrated a downward trend in trips made by car.

It should also be remembered that a significant proportion of journeys by car are only about 2 miles long and there is considerable potential to switch many of these trips to walking, cycling, light rail or bus trips through smart travel plans etc.

Paras 2.19 & 2.32 We find it strange that the Government has ruled out road charging as a means to manage congestion at peak times but are happy to constrain peak hour rail traffic through fares mechanisms.

Para 2.20 *A 5% reduction in road use would increase rail use by 50%.* This claim needs to be put into perspective. In terms of route mileage, rail only accounts for about 4% of the UK`s transport infrastructure and since the vast bulk of road journeys are only short distance trips, a rail option would not exist for most of them. Furthermore, the average journey by car is only about 6.5 miles long whilst the average journey by rail is approximately 25 miles long. It follows, therefore, that a much higher proportion of long distance road trips than 5% would switch to rail.

Para 2.33 This clearly demonstrates the urgent need to protect disused rail routes.

Para 2.42 We agree there is a need to increase the number of Strategic Rail Freight Interchanges (SRFI's), particularly in the London area. The disused yards at Cricklewood would have been an ideal location but the site has now been sold off for development.

Para 3.8 We note that the annual cost of road accidents is assumed to be £15bn but this does not include compensation for delays to other traffic, as would be the case with rail accidents. Another example of the lack of a level playing field between road and rail.

Para 3.14 In addition to station travel plans we would urge introduction of bus/rail integration with connecting timetables and smart ticketing. Interchange between bus and rail services at stations should be improved.

Paras 3.18 & 3.19 We note that the Government will not consider road charging on the existing network but would do so on new roads and river crossings etc. This policy would detract from the value of new roads, as most traffic would continue to use existing roads. The M6 relief road in the West Midlands is a case in point.

Para 4.4 We consider current business case appraisal to be flawed and that it fails to treat road and rail schemes equally. The use of theoretical values for time was severely criticised by transport consultants during the New Approach to Appraisal studies carried out by the last administration. Values attached to small time savings favours road schemes because of the shear volume of users add up small amounts to apparently large benefits but to individual users they are probably unnoticed.

Optimism bias between road and rail schemes is also treated differently with larger costs normally assumed for rail projects. Most rail investment is funded from interest bearing loans from world banks whereas most road improvement projects are funded by grants from the Treasury. This grossly inflates rail scheme costs by comparison.

Para 4.8 This illustrates the need to protect disused alignments.

Para 4.32 Global warming and climate change pose a serious threat to transport infrastructure. Severe damage to the rail link to Devon and Cornwall at Dawlish is a case in point. It could be more important to invest in mitigation measures to protect our existing transport network, making it far more resilient, than providing funds for grand new projects.

Para 4.56 We would welcome road safety improvements made possible by new design features.

Para 5.3 Air quality and the environment again illustrate the need for demand management through the use of road charging.

ANNEX F

Para 3 Modal shift from road to rail does not need an increase in motoring costs, only that those costs should be visible at the point of use. We note that rail usage has consistently increased even though above inflation fare increases have been applied for some 10 years while motoring costs have fallen in real terms and the road fuel tax escalator has been consistently frozen at the same time as road use has fallen.

We hope you find these comments useful and constructive.

Yours faithfully,

Norman Bradbury
Railfuture
Deputy Director Policy