

National Networks National Policy Statement consultation
Department for Transport
Great Minster House
33 Horseferry Road
LONDON SW1P 4DR

Transport Focus, Albany House,
Ground floor west, 94-98 Petty France
London SW1H 9EA

07711 319760
guy.dangerfield@transportfocus.org.uk
www.transportfocus.org.uk

nationalnetworksNPS@dft.gov.uk

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Transport Focus response to DfT's consultation: Draft revised national networks national policy statement

Transport Focus is the independent consumer watchdog representing the interests of rail passengers in Great Britain, bus passengers outside London, and users of England's motorways and major 'A' roads (the Strategic Road Network (SRN) managed by National Highways on behalf of the Government). We welcome the opportunity to respond to this consultation.

We note that the draft National Networks National Policy Statement (NNNPS) identifies the need for large-scale investments in the rail network to improve capacity, connectivity and reliability, all of which would improve the passenger experience. This is welcome.

Q5: Does the draft NNNPS adequately set out the need for developing national networks?

Agree in respect of the strategic road network, but with qualification. Chapter 3 lists as the first of five drivers of need 'maintaining network performance and meeting customer needs', and in, paras 3.5 and 3.26 cites insight from Transport Focus into what drives satisfaction of SRN users. However it is important to also note Transport Focus research into road users' priorities for improvement to SRN journeys, which shows that improved road surface quality tops the list:

<https://www.transportfocus.org.uk/publication/road-users-priorities-for-improvement/>

In short, we feel that NNNPS should reflect more strongly the importance of maintaining and renewing the existing network. Of course, a similar point applies to rail where the volume of maintenance and renewal is closely linked to the punctuality and reliability experienced by passengers.

Para 3.46 gives examples of enhancements to the SRN being promoted under Government policy, and it is important to identify prominently here the provision of roadside facilities for all users of motorways and major 'A' roads. Improved provision not only directly meets customer needs but also plays a vital role in enhancing the safety of national networks, and, with increased provision of rapid charging for electric vehicles (EVs), will also support the Government's net zero priorities by addressing anxiety around being able to recharge.

The NNNPS should explicitly recognise the strategic case for roadside facilities. This has to form part of the planning system's assessment of proposals for additional provision to fill gaps in the network, particularly facilities for lorry drivers.

Agree in respect of the rail network, but with qualification. The reference in para 3.57 to the need to reallocate capacity and capability to meet the demand for rail freight should make it clear that this should not be at the expense of passengers' interests. While there are fewer daily commuters, leisure travel has bounced back strongly. The latest version of the table shown in 3.50 shows journeys in the quarter to December 2022 at 369 million. The notion that, post-Covid, swathes of track capacity is available to reallocate to freight is likely to be misplaced.

The Government should guard against the risk that short-term financial pressures lead to railway land being sold that is later required to meet increased demand, including for car parking at stations.

In addition to the evidence on user needs set out in paras 3.58 to 3.60, Transport Focus has carried out more recent research into what matters to rail passengers. Please see <https://www.transportfocus.org.uk/publication/britains-railway-what-matters-to-passengers/>

Q6: In your view, is there any information missing from the 'general principles and considerations' chapter?

Q9: Does the NNNPS support development of freight facilities on the strategic road network, including lorry parking facilities?

Yes, the new NNNPS supports development of freight facilities, but there are omissions from how the policy is presented in Chapter 4. Para 4.55 asserts that road schemes 'should be developed with a mindset that accounts for the need for drivers to rest', and then rightly focuses on the needs of lorry drivers for safe and secure facilities that meet their welfare needs. The policy set out here should however be strengthened to make it clear that roadside facilities, for lorry drivers and other users, must be provided as an integral part of having an SRN, with National Highways coordinating and encouraging provision to meet its customer's needs. It is not just a consideration to be brought into the development of new enhancement schemes, but elsewhere on the network will justify free-standing proposals for new or expanded roadside facilities that will themselves need to be considered by the planning system. The NNNPS could also usefully refer to the Government's lorry driver facilities programme and the financial support for new and improved provision.

Guy Dangerfield
Head of Strategy