



Department for Transport

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Date:01/6/2023

Dear Sir/Madam,

Draft National Networks National Policy Statement consultation

As the Sub-national Transport Body (STB) for the England's Economic Heartland (EEH) region we welcome the opportunity to participate in DfT's consultation on the draft National Networks Policy Statement revisions (NNPS).

STBs play a key role in setting the ambitions for strategic transport connectivity in regions across England as well as setting a direction of travel with the publication of regional transport strategies. EEH covers the area from Swindon and Oxfordshire in the west to Cambridgeshire in the east, and Hertfordshire up to Northamptonshire.

In February 2021 EEH published our [transport strategy](#) outlining the connectivity priorities for the region, underpinned by 4 principles;

- Achieving net zero carbon emissions from transport no later than 2050, with an ambition to reach this by 2040
- Improving quality of life and wellbeing through a safe and inclusive transport system accessible to all which emphasises sustainable and active travel
- Supporting the regional economy by connecting people and businesses to markets and opportunities
- Ensuring the Heartland works for the UK by enabling the efficient movement of people and goods through the region and to/from international gateways, in a way which lessens its environmental impact

EEH welcomes the opportunity for consultation on the draft NNPS, which outlines DfT's framework to support decision making for nationally significant infrastructure including road, rail and strategic rail freight interchanges (SRFIs).

National networks provide critical long-distance links between places, enabling connectivity between people and communities. Maximising the benefits and opportunities arising from the investment in strategic infrastructure is at the heart of realising our ambition of EEH's regional transport strategy.

The Strategic Road Network (SRN) plays an important role in the transport system in the EEH region, supporting economic growth and connecting people and places within our region. It also provides key links between our region and the rest of the UK and provides a vital role in supporting the freight and logistics sector. Our transport strategy (policy 24) highlights support for investment in the Strategic Road Network (SRN) and Major Road Network (MRN) where we will support investment in the Strategic Road Network and Major Road Network where it meets one or more of the following criteria and is consistent with wider environmental objectives;

- Protects and enhances the existing infrastructure asset
- Delivers a solution to an identified problem on the existing infrastructure asset
- Enables access to new economic opportunities and/or housing growth.
- Enables delivery of sustainable transport linkages such as public transport and active travel improvements

Rail has the potential to provide improved connectivity by widening labour market access, providing connectivity initiate opportunities for economic growth, while acting on the need for net zero. Investment in transformational infrastructure, such as East West Rail, supported by high quality first and last mile provision, can be the catalyst for improving public transport networks and is central to supporting sustainable growth.

We therefore welcome the acknowledgement in the NNNPS of the significant role that efficient and effective freight movements (by all modes) plays in achieving economic goals and that there is a need for long-term strategic action through government and industry collaboration. EEH's location in a national context means that it acts as a gateway for the large parts of the UK and changes in the region could benefit a significant amount of the nation's population and businesses.

Annex 1 of this document summarises some of the key points EEH wishes to highlight as part of the draft NNNPS consultation. This response is being submitted alongside the consultation questionnaire provided on the National Networks National Policy Statement consultation webpage.

Once again, we thank you for the opportunity to respond to this consultation.

Yours sincerely,



Naomi Green
Managing Director, England's Economic Heartland

Annex 1: EEH response to draft National Networks National Policy Statement (key points)

EEH's response to the draft NNNPS has been structured into the following sections, aligned with the draft NNNPS - the need for development of the national networks (statement of need), general policies and considerations and generic impacts.

Our overarching comments are listed in bullet point form below:

- We welcome the acknowledgement of a wider range of challenges that the national networks face, expanded from traditional overcrowding and congestion measures only. However, this should include social, environmental, local connectivity considerations.
- We support a vision led approach. The draft NNNPS should reflect the message of being vision led throughout.
- The need to consider the transport system as a whole and consideration of integration of strategic networks and local networks, acknowledging that most journeys begin on a local network. In addition, strategic networks do not operate outside of the area that they pass through. Therefore, impacts of NSIPs on local networks and local communities should be at the forefront of consideration for an NSIP. The strategic and local transport networks should be equally supported and funded.
- The cumulative effects of NSIPs located geographically in close proximity are not covered in detail in the draft consultation document. In our region the cumulative effects of large infrastructure projects on communities and the transport system (such as highway maintenance) have been significant.
- We welcome consideration of future proofing of the network and the role and function that roads play, specifically with consideration for all users, including public transport and active travel. It should also consider the role of technology in future proofing and the opportunities that innovation can bring.
- The Development Consent Order process is complex and often subject to lengthy timescales. Certainty over planning and delivery timescales is important to provide confidence in delivery, to the supply chain and to communities, with early engagement to minimise delay to delivery. The draft consultation documentation widens the aspects covering the need for National Networks and consideration of impacts, in line with updated Government policy but does not provide information or detail about how delays in the process will be prevented.

The need for development of the national networks (Statement of Need)

Overarchingly EEH welcomes the acknowledgement of the wider ranges of challenges that the national networks face, expanded from traditional overcrowding and congestion measures only. The NNNPS outlines the needs and drivers for the need to develop national networks through infrastructure interventions including maintaining network performance and user need, connectivity and economic growth, resilience and adaptation to climate change, environmental, net zero and safety.

Our EEH transport strategy¹ outlines the need to prioritise proposals based on their value for money, contributions to achieving net zero targets and their contribution to wider sustainability, environmental net gains and health outcomes. Social, environmental, and economic considerations should be considered in establishing the need for development on national networks. Social consideration appears to have been considered in less detail in the consultation document.

Positively the draft National Policy Statement (NPS) recognises the complementary role the SRN provides to the major road networks and local roads with the strategic and long-distance

¹ https://eeh-prod-media.s3.amazonaws.com/documents/Connecting_People_Transforming_Journeys_av.pdf



nature of the SRN providing long distance traffic with a safe and efficient route, freeing up local roads for genuinely local journeys and active travel, and keeping traffic away from principal centres of population. EEH, as an STB, agrees with this sentiment that transport should be considered as part of a whole system approach, one which considers all modes of travel and how they interact. This must, however, come with funding for improvements to the local road network (including MRN) and forward planning about the impact on the whole network. Particular attention must also be given to ensuring the strategic is demonstrably contributing to supporting modal shift, even by funding interventions off the strategic network where it is appropriate to do so.

Additionally, the NNNPS states that there are a range of measures that can be employed to make the best use of capacity (with the guidance referring specifically to roads in this case), including active and sustainable modes, genuine transport choice, greater deployment of technology and integration of land use and planning. These must be considered and included as part of core schemes, not as an add on consideration and sufficient levels of funding should be included to support these measures. By way of example, historically active and sustainable modes have been considered outside scheme 'red line' boundaries to differing degrees and often not integrated into a wider network. Early, and measured, engagement with partners to understand local ambitions to create a comprehensive network will be important as part of any scheme. This should be reflected in the NNNPS guidance to support future proofing.

Therefore, when considering NSIPs due consideration must be given to alternatives, including the use of technology and sustainable modes. Policy relating to sustainable modes and travel hierarchy must be applied and the impact of the intervention being addressed.

We are supportive of the NNNPS document's acknowledgement that making best use of existing asset is important and that bringing forward maintenance schemes and small-scale enhancements to ensure that the SRN and rail network to ensure they operate as effectively as possible. This is particularly important in relation to a challenging fiscal environment. Where large scale intervention is required, it should be targeted and bring benefit to local communities. Paragraph 3.47 suggests that in some cases it will not be sufficient to expand the capacity of the current road network and measures for new and improved junctions, slip roads, improvements to trunk roads (including dualling) and measures to enhance capacity of the network will be considered. Where this is the case, the carbon implications and the impact on future demand must be considered.

Additionally, our transport strategy outlines the requirement for modal shift and facilitation of transport choice to contribute towards net zero, alongside decarbonisation of the fleet. The NNNPS outlines that the 'National Road Traffic Projections' projects road traffic between 2025 and 2060. Scenarios modelled (which includes uncertainties in demographics, economic growth, behavioural and technological change and decarbonisation) have projected a growth of traffic between 2025 and 2060 for England and Wales, with forecasts ranging from 12% to 54% with the core scenario suggesting a 22% increase in traffic between 2025 and 2060. The draft NNNPS also states that an increase in vehicles miles undertaken can lead to worsening performance of the network. By taking a vision led approach, rather than 'predict and provide', the outcomes of an intervention must be considered in relation to whether they meet the vision and policy set. There should be an expectation that the solution to a roads performance issue may well be most effectively solved by an investment elsewhere – be it another form of infrastructure or through a connectivity-solution. Where these solutions can be demonstrated, access to funding should be mode-agnostic.

EEH welcomes acknowledgement of the role of transformational and well-targeted rail investment in improving connectivity for people and goods to and between economic centres is acknowledged in the document. Our own EEH Passenger Rail study identified where stronger rail connectivity between economic centres would generate a significant return on investment. Improved rail connectivity can enable better access to opportunities for people and create opportunities to drive agglomeration and collaboration for businesses and the ability to expand



labour markets. Our business imperative narrative 'Building Better Connections – the Business Imperative for East West Rail'² highlights this in the case of East West Rail, giving the business voice for the importance of East West Rail in the EEH region.

Investment in rail is needed to enhance customer experience, reliability, and improved connectivity, as outlined in the consultation document. Paragraph 3.78 suggests larger interventions including new rail links will be required in a number of cases to meet needs, such as where the network is at capacity or places lack connectivity, with consideration of the affordability and value for money of the intervention. The government will look to make appropriate improvements or additions to the rail network to improve capacity, connectivity, and reliability, including removing pinch points and blockages, upgrading existing infrastructure, reopening old alignments, adding new rail lines and stations to the network, or improving critical enabling assets such as maintenance facilities.

By way of example, the constraints on rail connectivity between Felixstowe and the Midlands and North places additional pressure on our strategic road infrastructure, with consequential implications for the logistics sector operation and carbon emissions. Investment in infrastructure to increase rail freight will realise benefits on the strategic road network.

The Felixstowe to Midlands and North route is one of the strategically important corridors, identified within UKNET in the Union Connectivity Review and considered the highest priority corridor for investment by the freight industry. It is clear from the work undertaken by Network Rail so far on the Ely Area Capacity Enhancement, that the planned improvements at Ely will deliver substantial national economic, levelling up and decarbonisation benefits through the planned doubling of freight capacity, alongside increased passenger services on poor frequency routes. The benefits spread well beyond the East, supporting access and growth in the Midlands and North as well.

The rail network also has an important role to play in freight, logistics and supply chains. However, while the freight and logistics sector are essential for our businesses and communities, it is also one of the largest contributors to carbon emissions and potentially the most difficult part of our transport system to implement solutions to reduce emissions. Similarly, for communities affected by growth in freight volumes on smaller roads, the adverse impact can be significant. EEH is therefore supportive of mode shift of freight by road to rail and the use of innovation in potential solutions.

Investment in the capacity and resilience to accommodate even more of the longer distance trunk movements of freight, along with ease of interchange will help unlock the opportunity to grow the market for rail freight. When considering the 'economic value' of rail freight both user benefits and (cost savings which accrue to shippers when using rail freight rather than road haulage) and non-user benefits (ie. the monetised benefits to wider society such as lower greenhouse gas emissions, less congestion, fewer road accidents, lower tail-pipe emissions etc) should be considered.

EEH would like to see an increase in the number of rail freight movements and its market share within the Heartland, based on rail freight volumes and percentage of freight moved by rail than by road, particularly in the key freight corridors that pass through the region. Technical work commissioned by EEH in response to the recent consultation on setting a rail freight growth target³ suggests that out of the total volume of goods moved in Great Britain by rail freight 10,826 million tonne – km to/from other areas passed through the EEH region, equating to 60% of all goods moved by rail freight in 2021. Consequently, investment in strategic rail infrastructure in the region has the potential to boost economic activity across the nation.

² <https://eeh-prod-media.s3.amazonaws.com/documents/Building-Better-Connections-Business-Imperative-for-East-West-Rail-v5.pdf>

³ <https://gbrtt.co.uk/what-we-do/rail-freight-growth-target/>



EEH welcomes commitment by government to promote and grow rail freight, however unlocking the opportunity to grow the market for rail freight requires investment in infrastructure in addition to rail network capacity, to provide the capacity and resilience to enable it to be a more attractive offer for logistics companies. Strategic Rail Freight Interchanges (SRFIs) reduce the cost to users of moving freight by rail, by streamlining the process and enabling warehouse facilities to be incorporated into the end destination. They are additionally important in facilitating the transfer of freight from road to rail thereby reducing trip mileage of freight movements on both the national and local road networks, which incentivises the modal shift of freight from road to rail.

A fully effective network of SRFIs, supported by smaller-scale rail freight interchanges, will help to enable the sector to reach its full potential to increase the percentage of goods moved by rail. The shortage and cost of land-supply for industrial storage and distribution in London may see more companies relocating their distribution centres in the Heartland. EEH support the development of Strategic Rail Freight Interchanges in our region where they support an increase in rail freight and their impact on our transport network can be suitably managed.

The proposed update identifies that a network of SRFI's is needed across all regions to serve regional, sub-regional and cross-regional markets, and that there is a compelling need for an expanded network of SRFI's. This is welcome, however it is not linked to any actual forecasts or demand modelling. As set out above, EEH provided evidence to support the development of a rail freight target. It is hoped that the Great British Rail Transition Team announce a suitably ambitious target and that there will be a mechanism to link the need for an SRFI in an area to support meeting the rail freight target.

The last version of the NPS did include Network Rail's Rail Freight Forecasts, however these are not included in this update. As per the Rail Freight Target, we would expect Network Rail forecasts to be included too.

Paragraph 3.108 states that 'Consideration should be given to ensuring existing SRFI locations are taken into account when making an application, to ensure that SRFIs are strategically located and thus enable a cross-country network and consideration should be given to proposals for SRFIs in areas where there is currently lesser provision'.

For efficient logistical purposes, a lot of warehousing is clustered, and this is true within our region as well as the Midlands (eg around the 'Golden Triangle' for logistics). We agree with the principles to ensure SRFI's are located across the network to increase access for intermodal rail freight. In our region there are 23 active rail freight terminals that handle a mixture of containerised freight, construction materials, domestic waste, automotive and metals. The provision of additional floor space served by rail freight terminals increases the attractiveness and competitiveness of rail versus road haulage. We hope that the consideration to locate SRFI's in areas where there is currently lesser provision does not exclude opportunities for new SRFI infrastructure where there is existing provision eg around the Daventry, Midlands 'Golden Triangle' as such proximity could support the demand required and nature of how the market works for logistics. In our Transport Strategy EEH have committed to work with partners and the freight and logistic sector to identify the need for additional Strategic Rail Freight Interchanges where they support the overall ambition of our region.

General policies and considerations

The 'general policies and considerations' section in the draft NNNPS give guidance on business cases, local transport models, fit with wider strategies, environmental assessment, security, health and accessibility and criteria for good design.

Applications for road and rail projects will normally be supported by a business case prepared in accordance with Treasury Green Book principles and the Department's Transport Business Case guidance and Transport Analysis Guidance. Specifically mentioned is the economic case, however, increasingly the strategic case for intervention is highlighted as being of upmost important in communicating the need for intervention. It would be beneficial to highlight the importance of the strategic case for intervention in the guidance, as has been done with the economic case. As already highlighted in comments relating to the statement of need, financial assessment should not be the sole consideration in assessment, but also the strategic narrative, social and environmental.

Consideration of alternatives, including making best use of existing asset and consideration for national policy in relation to decarbonisation and modal shift will be important in consideration of the business case. Long standing concerns of webtag assessment of benefits, and the presumption towards the universal benefits of journey time saving (even if at a cost to other road users) must also be addressed.

Good design is an integral consideration for an NSIP projects and we are therefore supportive of the draft NNNPS acknowledges that design will be considered a material consideration at decision. The acknowledgement that design should not be limited to aesthetics and that it allows considers appropriateness to location, impact of the wider local environment and communities, being adaptable to future needs (including climate resilience) and technologies and being highly accessible and inclusive. NSIPs should promote inclusion, cohesion and increase accessibility, making a positive contribution to the environment and communities. The NSIP process should set, and frequently review, minimum standards in infrastructure design.

As an STB, we consider the transport system as a whole and therefore, design of the infrastructure should incorporate sustainable travel into the core scheme, for example, active travel schemes should be part of the core scheme as opposed to an 'add on' and consideration should be given to wider network planning, improvements (rather than replacing like to like) and long-term vision for the active travel network. The same principles should apply to public transport. Retrofitting improvements rather than future proofing may be harder to deliver and therefore forward thinking is crucial in deciding the design of a scheme.

EEH is supportive of interventions which improve the safety of the network, and therefore, the reduction of casualties. Highways developments provide an opportunity to make significant safety improvements and significant incident reduction benefits when they are well designed. The opportunity should be taken to improve safety in every scheme, considering the user hierarchy. EEH is keen to support our partners wishing to pursue the application of 'vision zero' principles at the local level and National Highways vision zero approach.

Overarchingly, more emphasis should be given on how the predicted benefits of their proposals are measured and the outcomes of enhancements should be monitored.

Generic impacts

The NNNPS sets out how impacts (positive and negative) of NSIPs should be considered as well as mitigation measures which should be applied. The draft NNNPS outlines the following



impacts: greenhouse gases, biodiversity, waste and recycling, civil and military aviation and defence, coastal change and marine impacts, dust, odour, artificial light, flooding, land contamination and instability, landscape and visual impacts, historic environment, noise and vibration, socio economic impacts and green belt should be considered (both positively and negatively).

As a sub national transport body, EEH considers strategic connectivity across the EEH region, taking advice about the environmental aspects of our work at a proportionate level to the strategic nature of our work. The wide range of topics considered is welcomed and should be considered in greater detail by subject matter experts in these areas. We are supportive of taking a whole system approach, where there is a co-ordinated approach to shaping connectivity, place making and sustainable development.

There are opportunities to integrate sectors such as transport and environment for example, water management or climate change adaptation. Combining thinking and delivery in different sectors can capture wider benefits for our communities by integrating solutions at early points in scheme development. It is in this context that our transport strategy outlines that all new transport-related development should protect and enhance the environment and be based on the principles of net zero carbon, net biodiversity gain, net environmental gain and contribute towards doubling the land actively managed for nature.

The OxCam Pan Regional Partnership Environment Group (formerly Oxford Cambridge Arc Environment Group) has collectively set a series of [environment principles](#), encompassing ambitious and aspirational targets for doubling nature, sustainable living and working and innovative solutions to energy and water. Where NSIPs are delivered, they should be cognisant of locally or regionally set ambitions.

The document outlines that a key part of environmental assessment is the consideration of cumulative effects and that the applicant should provide information on how the effects of the proposal would combine and interact with the effects of other development, where relevant.

However, the cumulative impacts which occur where NSIPs are located close to each other is not outlined in considerable detail. The combined implications (negative and positive) of NSIPs can have considerable impact on a local area. For example, in the EEH region impacts from major projects such as HS2 and East West Rail in the construction phase have had adverse impacts on local roads and communities, including increased construction vehicles impacting local roads and communities. Phasing of the NSIPs, and associated works, should therefore need to be tested in order to minimise disruption.

Viewing interventions in strategic networks a whole as part of the entire transport system is crucial to the development of a well-planned, designed and co-ordinated approach ensuring a journey from A to B is as seamless as possible for the user. Therefore, we are supportive that NSIP applicants should seek to offer an integrated transport outcome, significantly considering opportunities to support other sustainable transport modes, as well as improving local connectivity and accessibility in developing infrastructure and this being in line with the principles of a road user hierarchy. Application of the principles must be applied to NSIPs during development and at scrutiny.

We are pleased that the document notes the need to produce travel plans in consideration of sustainable modes and accessibility and for the need to align with local transport plans and Local Plans. Para 5.279 suggests schemes should be developed, and options considered, in the light of relevant policies and plans, both national and local, taking into account local models where appropriate. Through their Boards, STBs have democratic accountability for developing regional transport strategies that, in the Cities and Local Government Act 2016 the Secretary of State for transport has an obligation to have regard to in determining national policy in relation to transport and how such policies are to be implemented within the defined STB



area⁴. As a result, Regional Transport Strategies, produced by STBs should be listed within the NSIP process for key consideration.

The impact of enhancements to the SRN may also be felt across other routes, modes, and a wider geography than the location of the intervention. Investment in the region's local network, including the Major Road Network, should be viewed in tandem and allocated where intervention is required. We therefore welcome increasing project scope so that applicants avoid impacts on surrounding infrastructure and to provide resilience to the wider network.

Paragraph 5.263 suggests that different transport networks may need to share space within an area whilst serving different travel needs. For example, bus lanes, shared cycle lanes, green lanes, or bus and rail routes on the same corridor. Given the conflicting demands on highways space, the NSIP should be explicit in the need for DfT to provide greater clarity on balancing the needs of different modes within limited space

Specifically, there should also be consideration given to how the impacts of interventions will be monitored on an ongoing basis to apply lessons learned in the future. This could be included as an additional paragraph in the document.

Other

The Development Consent Order process is complex and often subject to lengthy timescales. Certainty over planning and delivery timescales is important to provide confidence in delivery, to the supply chain and to communities, with early engagement to minimise delay to delivery.

The draft consultation documentation widens the aspects covering the need for National Networks and consideration of impacts, in line with updated Government policy but does not provide information or detail about how delays in the process will be prevented.

The consultation document does not see out how the process timelines will be streamlined but more information about the considerations for application may help reduce the number of challenges posed.

We understand that the National Highways SRN Initial Report (currently out for consultation) has been developed with awareness of the updated NNNPS. It will be important for RIS3 to align and take account of the new NNNPS when being developed.

⁴ [Cities and Local Government Devolution Act 2016 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

