



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

31 January 2014

Consultation on a Draft National Policy Statement for the National Road and Rail Networks

On behalf of Liverpool and Sefton Chambers of Commerce and its members, please accept this letter by way of response to the Consultation on the draft *National Policy Statement for the National Road and Rail Networks*.

Liverpool and Sefton Chambers of Commerce represent businesses and business interests throughout the Liverpool City Region (LCR) – an area that provides essential goods and services to, and supports employment for, the fast growing regional economy that extends beyond LCR to include West Cheshire and North East Wales, thus serving a population of 2.5m, and generating an annual GVA of £43bn.

We note that this NPS does not cover HS2; we are concerned at the omission of any reference to HS2 as context, in terms of how the Government envisages a high speed rail network evolving beyond HS2. While HS2 does certainly provide significant new capacity to parts of the rail network thereby relieving pressure on these areas, it in itself does not negate the need for capacity improvements on the existing network.

We query the “predict and provide” approach; all transport modes should be used to their best and maximum capability as an integrated transport system, and as historic trends show, whilst “travel” is growing, that doesn’t necessarily equate to an increase in road transport. Indeed, car traffic levels have stagnated and declined over the last 10 years (down 2.8bn miles). Therefore whilst making allowances for the effect of the recession, growth in traffic has been negative relative to growth in GDP, motoring-age populations and rail travel demand. DfT forecasts would seem to ignore this trend and assume a return to car traffic growth at levels last seen in the 1990s.

Light van traffic has risen sharply - up 61% - over the last 20 years, possibly as a result of the increase in online shopping. If van traffic continues to grow at such a level due to internet retail, there will be a fairly dramatic and negative impact on the economy of high streets, with localised economic and social problems that would need to be planned for.

The UK economy is increasingly dependent on its major cities and their associated City Regions; the main drivers of the economy outside London and the Greater South East. The former metropolitan counties, together with the Bristol, Nottingham, Cardiff and Glasgow city regions:

- Deliver 23% of the national economy (Regional GVA, 2011);
- Contain 25% of private sector jobs (Business register and employment survey, 2011);
- Contain 26% of the working age population (Census 2011).

If the UK economy is to remain internationally competitive and develop in a sustainable manner, it is necessary to make greater use of the cities and regions outside of London, and this requires improved connectivity. Therefore in establishing the need for the development and enhancement of national networks, the NN NPS needs to focus on rebalancing the economy through:

- Improved connectivity for key cities outside the London & Greater South East;
- Capacity improvements that will enable northern and western ports to expand which will help ease the pressure on the South East Coast ports and transport networks;
- Improvements that will enable regional airports to release capacity pressures on London and the Southeast;
- Importance of infrastructure development making use of local supply chains wherever possible in order to maximise local jobs and economic benefits; and
- Improved workforce health and productivity through more emphasis on sustainable transport modes.

The NN NPS must recognise that adequate transport links are a key enabler of tourism – both domestic and international. Tourism is an important growth market, generating £127bn GVA for the UK economy and supporting 3 million jobs, according to a 2013 report by Visit Britain. For international markets, good national links can help generate a “dispersal” effort, more than would be the case otherwise, from core international arrival hotspots such as London and Edinburgh. For domestic markets, good links are important in ensuring convenient, value for money access. Therefore improving the connectivity of our key cities, such as Liverpool, via the national networks both domestically and internationally, is vital to sustained growth of this sector.

Rail travel must:

- Be a viable option for both business and leisure travel;
- Support regional and local public transport to connect communities with public services, workplaces with each other;
- Provide for the transport of freight across the country, and to and from ports in order to help meet environmental goals; and
- Improve the quality of life.

Indeed, it is widely acknowledged that Britain’s railways are experiencing the highest levels of growth for both passengers and freight for decades. We welcome acknowledgement that substantial investment in rail infrastructure capacity – particularly on interurban routes between our key cities, London & South East routes and major city commuter routes – will be needed. We also welcome acknowledgement that where major new inter-urban alignments are required, high speed rail

alignments are expected to offer the most effective way to provide a step change in inter-city capacity and connectivity, as well as helping to deliver long term sustainable economic growth.

For many freight movements, rail can be unable to undertake a full end-to-end journey for the goods concerned. The Government therefore needs to ensure that freight generators are rail connected, so that the opportunity for rail can be maximised. We welcome the recognition that there is a compelling need for an expanded network of strategic rail freight interchanges; however we consider that this should also equate to greater encouragement for both freight generators and distribution hubs to be adequately rail connected.

It must also be acknowledged that the export market is as important as the import market, since export is critical for growth, and since we are an island nation, international connectivity is equally as important. Indeed the “Eddington Transport Study” of 2006 recognised that “transport corridors are the arteries of domestic and international trade, boosting the competitiveness of the UK economy.”

Whilst the NN NPS focuses on the rail and road networks, it should acknowledge the links with the Ports National Policy Statement published in Feb 2012, given the contribution water freight (both coastal shipping and inland waterways) can make as part of an integrated multimodal transport system. This is particularly relevant since 95% of freight arrives in the UK via its sea-ports. It should therefore ensure that ports are adequately linked to the National Networks so that goods can be distributed by the most appropriate mode of sustainable transport, including water and rail.

With over 50% of the UK’s container market closer to Liverpool than any other deep-sea port, shipping through the Liverpool2 deepwater container port will offer significant savings on the total door-to-door journey of freight. Liverpool2 will be the quickest and most cost-effective route to market, not just for goods destined for Northern England but also for Scotland, Ireland, North Wales and the Midlands. There is, therefore likely to be an increasing need for new strategic rail freight interchanges across the UK to take into account these potential traffic flow changes.

We would also expect the NN NPS to be in line with the recommendations of the Transport Select Committee’s recent report “Access to Ports”, (the Eighth Report of Session 2013–14), which recognised that our ports are “essential to the economic well being of the nation”, but highlighted that “Ports cannot function effectively if hauliers and logistics firms struggle to get goods in and out of them, no matter how modern and efficient the infrastructure inside the port gates.”

Finally, The NN NPS needs to ensure that airports are adequately linked into the National Networks as part of an integrated transport system, along with the key passenger ferry ports (such as Holyhead, Liverpool, Plymouth and Portsmouth).



We trust that you find these general comments on the NN NPS constructive.

Yours sincerely,

A handwritten signature in black ink that reads 'Jenny Stewart'. The signature is written in a cursive, flowing style with a clear dot over the 'i' and a distinct end stroke.

Jenny Stewart

Chief Executive Officer, Liverpool and Sefton Chambers of Commerce