

Monitoring Highways England Consultation

1. Freight on Rail thanks the ORR for this opportunity to comment on the new duties of ORR with regard to Highways England (HE).
2. Freight on Rail, a partnership of the rail freight industry, the transport trade unions and Campaign for Better Transport, works to promote the economic, social and environmental benefits of rail freight to local and central Government in the UK and to the European Commission, Parliament and Council of Ministers.

3. Summary

We welcome the new role and believe that the proposed approach is reasonable for the first year and is expected to develop. We acknowledge that the consultation is about how ORR implements the powers which you have been given. Additionally we have suggested areas where ORR could work, if the Secretary of State asks ORR to do so or if the ORR felt able to within the scope already given. We support the approach for the following reasons:-

Represents a key opportunity to improve integration between the different freight modes. There are significant similarities and challenges faced across the road and rail network.

- a) ORR already has core skills in assessing performance which it can use to analyse outcomes on HE projects, set benchmarking and monitor expenditure against budgets. Ability to compare costs and subsidies across both modes would be very valuable as it would enable Government to fully compare the costs and benefits of different modes, social outcomes and opportunities for efficiency. The subsidy which HGVs receive currently means that HGVs are paying less than a third of the external costs they impose on the economy and society. It is therefore hard for rail to compete on price as it gets ten times less subsidy than HGVs. If rail is to play its full role in the logistics industry, the Government needs to support rail freight accordingly.

<http://www.freightonrail.org.uk/HotTopicsDangerousDirty&Damaging.htm>

Related documents:

[Addendum-to-MTRU-2014-report.pdf](#)

[Dangerous, dirty and damaging - New research reveals impact of HGVs](#)

- b) Allow better management of assets long term.
- c) Advisory role to Government on level of funding.
- d) DfT is underestimating the significant reductions in congestion from shifting to rail on key congested corridors. Government research has played down the potential benefits of the



Freightliner



Freight on Rail is a partnership of many organisations promoting the economic, safety and environmental benefits of rail

transfer from trucks to sustainable methods by only looking at national averages across all strategic roads. Department for Transport figures state that a modest decrease in traffic of around 2 per cent, results in congestion falling by 10 per cent. A 50 per cent increase in rail alone could reduce HGV traffic on busier roads by 12 per cent and road congestion by 9-12 per cent.

But this new research also looked at specific routes which typically tend to be more congested because of more long-distance HGV traffic, particularly to ports. [Potential reductions in congestion on the strategic road network from alternatives to HGV use.](#)

Metropolitan Transport Research Unit, April 2015

- e) Secure improved performance and value for money from the strategic road network
- f) ORR's role can encourage economic growth
- g) Deliver better environmental outcomes
- h) Help cyclists walkers and other vulnerable road users.
- i) Help keep the network in good condition.
- j) It will be able to improve the level of transparency and benchmarking of economic analysis.
- k) It will be able to advise Secretary of State on the next Road Investment Strategy.
- l) Role in enforcing performance, issuing warnings and fining HE with data being issued into public domain.
- m) We look forward to seeing the consultation on bench marking programmes
- n) The secondary legislation to get the legal powers for the ORR to carry out the monitoring role should be introduced as soon as possible.

Seeking our views paragraph 32 Page 11 –

Where we believe there are omissions in the monitoring role.

Question 1. Agree that consultation makes role clear

Question 2 We believe that ORR should be given a role monitoring road safety because lorries are involved in a increasing percentage of fatal traffic accidents on Britain's roads. In 2012, HGVs were



Freightliner.



Freight on Rail is a partnership of many organisations promoting the economic, safety and environmental benefits of rail

implicated in more than half of fatal motorway accidents and one-in-five fatal accidents on A-roads, continuing negative trends over the last five years. (See note 1)

Question 3

Lack of integration in corridor planning in Highways Agency and DfT strategic planning.

In future, the ORR should make sure that Highways England never produces strategic road reports again on transport corridors without including the parallel rail routes.

A glaring fault in the Highways Agency Road Based Studies was that they would not take account of any of the parallel rail routes when analyzing the corridors from either Southampton or Felixstowe to the West Midlands even though rail handles almost a third of the freight traffic out of both ports. This was despite the fact that Freight on Rail highlighted this omission on several occasions both orally and in writing. Without proper corridor analysis, there is a danger that the latest and planned upgrades to the Strategic Rail Freight Network will not be taken into account in Government planning which could result in a false picture of demand on the strategic road network.

Question 4 HE Integration Fund- ORR should develop metrics to assess the performance of the integration fund designed to link public transport and rail freight terminals with the Strategic Road Network.

Question 6

HE should issue proper environmental and traffic impact assessments to the public as part of consultations even if the HE does not need to get planning permission and is therefore not part of its statutory duty. In the past, campaigners have experienced difficulty in getting details on options considered in the Route based Studies and have been forced had to make freedom of information requests for detailed reports such as how all junctions will perform . Therefore, at the consultation stage, HE should make live traffic data available. HE should share its forecasting and modelling data. HE should be obliged to take into account and advise local authorities on the impacts of upgrading the strategic network on the local road network for which local authorities are responsible.

Note 1

HGV traffic and fatal accidents by road type

Traffic in billion veh kms	HGV traffic	All motorised traffic	HGV %	% fatalities involving at least 1 HGV	Ratio of HGV to all motor vehicles
Motorway	10.9	99.8	10.9%	52.3%	480%



Freight on Rail is a partnership of many organisations promoting the economic, safety and environmental benefits of rail

FREIGHT on RAIL

A	11.7	217.3	5.4%	18.1%	335%
Minor	2.4	167.0	1.4%	7.2%	514%

Source: Traffic statistics table TRA0104, Accident statistics Table RAS 30017, both DfT

Philippa Edmunds, Freight on Rail Manager June 18th 2015



Direct
Rail Services

Freightliner.



Campaign for
Better Transport



SCHENKER

tssa
the union
for people
in transport

RFG
Rail Freight Group

Freight on Rail is a partnership of many organisations promoting the economic, safety and environmental benefits of rail