

This is the response of DB Schenker Rail UK to the ORR consultation document "Monitoring Highways England" issued in March 2015.

The ORR's new role represents an opportunity to improve integration between the different transport modes given that are significant similarities and challenges faced by both the road and rail networks.

We welcome the opportunity for ORR to use its existing skills in assessing performance which it can use to analyse projects, set benchmarks and monitor expenditure against budgets. ORR will develop a unique ability to compare costs, subsidies and benefits across both modes which will be useful in assisting Government in;

- \* ensuring a level playing field between modes

- \* advising Governments on levels of funding.

DB Schenker believes that the ORR's ability to make modal comparisons will become an important element of the advice they will give to the Secretary of State on the next Road Investment Strategy.

#### Specific questions

Question 1. We agree that the consultation makes the existing role clear. No doubt the role will evolve over time.

Question 2 We believe that ORR should be given a role monitoring road safety because of the overall cost of road accidents to the UK economy.

Lorries are involved in an increasing percentage of fatal traffic accidents on Britain's roads. In 2012, HGVs were implicated in more than half of fatal motorway accidents and one-in-five fatal accidents on A-roads.

Question 3 We suggest there is a lack of integration in corridor planning in and between Highways Agency and DfT strategic planning. In future, the ORR should make sure that Highways England does not produce strategic road / transport corridors reports without including analysis of parallel rail routes.

A disappointing feature of the Highways Agency Road Based Studies was that they did 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 this omission was highlighted by the rail sector on several occasions.

Without proper corridor analysis, there is a danger that planned upgrades to the Strategic Rail Freight Network will not take into account the latest view of Government thinking, which could result in a false picture of demand on the strategic road network.

Question 4 We suggest that the ORR should develop metrics to assess the performance of the Highways England Integration Fund which is designed to link public transport and rail freight terminals with the Strategic Road Network.

Question 6 We suggest that Highways England should issue proper environmental and traffic impact assessments to the public as part of consultations even if planning permission is not necessary and therefore there is no statutory requirement to do so. In the past, it has proved difficult to get details on options considered in the Route based Studies and interested parties have been forced to make freedom of information requests for detailed reports such as "how junctions will perform". Therefore, at the consultation stage, Highways England should make live traffic data available and share its forecasting and modelling data.

We also suggest that Highways England should be obliged to take into account, and advise local authorities of, the impact of upgrades to the strategic road network on the local road network for which local authorities are responsible.

Please contact me if you would like clarification or amplification of any of these points.

Regards

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