

Transport Planning Society

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Response to ORR Consultation on monitoring Highways England

The Transport Planning Society is an independent institutional body in the UK, established to facilitate, develop and promote best practice in transport planning and to provide a focus for dialogue between practitioners and others interested in the field. It is supported by four long established professional institutions – ICE, CIHT, CILT and RTPI - all of whom have an interest in transport planning as well as their own core activities.

The Transport Planning Society administers its own Professional Development Scheme for transport planners, leading to award of the Transport Planning Professional (TPP) qualification which is the only professional qualification uniquely aimed at transport planners. The Society has over 1000 individual members and 30 corporate member providers of transport planning services in the UK and elsewhere. Many of our members are active in highway planning and management, including extensive experience of working with or within the former Highways Agency and now Highways England.

Although our individual members may have views on a wider range of issues, as a Society we would like to respond to consultation questions 1, 3, 4, 5 and 6. Our focus is on the interface between the SRN and its users, as well as its external effects on other facets of life. Our response has been drafted by the Policy Group within the Transport Planning Society Board, all of whom were elected by the membership as a whole. The Policy Group is in constant dialogue with other members of the Society and the views expressed here may be taken as representative of those held generally by our membership.

Q1 Are you clear what our role will involve? Are there aspects of our role which you would like more clarity about?

We comment on the ORR's powers to potentially levy fines on Highways England for lack of performance. While we agree that enforcement action may be necessary in such cases, we are concerned that fining the company and thereby presumably reducing funds for investment is not the appropriate solution, albeit that we appreciate that such an action may be only be taken after improvement notices have been issued. The overriding objective

must be to achieve the specified performance rather than penalising lack of it, and ways need to be found to secure this. If ultimately, Highways England cannot find ways to deliver, then there should be a mechanism to review the management of the company and the positions of the key Directors responsible.

Q3 Are there specific ways you would like us to engage with you beyond the industry forums already referred to in this document?

A representative of the Transport Planning Society participated in meetings with ORR on 14th January 2015 and with DfT on 19th January 2015, and we would like to continue this engagement.

Our primary interest lies in the fact that the SRN is a crucial part of England's wider transport network and it is imperative that its development and monitoring should be undertaken within a broad transport planning context, rather than simply meeting internal goals. In particular, the interfaces between the SRN and local authority highway networks, the environment including climate change, and the social and economic needs of the population are paramount.

We also believe that a wide range of solutions need to be assessed when addressing problems on the SRN, including investment in competing modes (most notably, rail), improved network operation, the application of technology, and the application of demand management to limit traffic growth. The RIS should reflect this approach and we can assist ORR to assess the RIS in this respect.

Our profession has extensive expertise in transport modelling and we would be pleased to offer this expertise to ensure that the RIS is soundly based and robustly appraised. In particular, DfT's National Traffic Model has been subject to criticism over its forecasts and lack of transparency and we would be glad to assist DfT in preparing the best possible traffic forecasts for use in developing the SRN. We are pleased to note that Highways England is already procuring regional traffic models and we would be glad to assist in this process by, for example, by advising in general terms, reviewing progress or auditing models.

In summary, we believe that we have a strong role to play in ensuring that best transport planning practice is applied in developing, appraising and monitoring the RIS. We would be glad to be included in bilateral meetings and stakeholder forums for this purpose.

Q4 Have we identified the key areas that require monitoring? Are there particular areas of Highways England's performance and efficiency which you consider require specific focus or an alternative monitoring approach?

We firstly comment on the various aspects of the Performance Specification set out in the consultation document.

Making the network safer

We recommend that the numbers of KSI's be disaggregated by road user type killed, injured or involved. This will prevent adverse trends in one area being disguised by an overall improvement. For example, particular issues for vulnerable road users or, say, HGV's could then be identified, understood and addressed.

We add one further comment. Safety-driven investment is well established on the SRN but given that so much has been done, there may be a limit to the scale of further investment in infrastructure and highway operation that will be cost-effective. We recommend that the RIS encourages Highways England to engage with vehicle manufacturers and to look at the human factors which contribute to incidents, and that this outreach is monitored. While most drivers drive most of the time without safety issues, it is the exceptions that need to be understood.

Improving user satisfaction

Transport has many external, third party impacts and the environmental impacts of the SRN produced by motorised vehicles on others can be significant, including frontagers and non-motorised users of the network such as pedestrians, cyclists and even equestrians. We would wish to see frontagers and non-motorised users of the network included in any NRUSS.

On a separate issue, the information given to road users during an incident is often poor, unhelpful or non-existent. We recommend that the NRUSS includes a specific question on this point.

Finally, given that one bad experience of using the network can outweigh many good ones in the user's mind, there is a need to validate user responses against factual data. For example, user concerns about congestion can be validated against directly collected data re. network performance, as noted in our response to Question 6.

Supporting the smooth flow of traffic

We feel that lane availability alone is a weak measure and that lane closures or non-availability should be linked to prevailing traffic demand. For example, a lane closure at a time when the remaining carriageway has sufficient capacity for the prevailing flow has little or no effect on smooth traffic flow, apart from the possible imposition of a speed limit for safety reasons. On the other hand, closure of a lane at peak times on a carriageway running at or near capacity will have significant effects on traffic flow and delay.

Similarly, while rapid clearance of an incident is usually helpful, the more important factor is the delay to traffic, and we recommend that steps are taken to monitor this rather than simply the time to clear an incident. Indeed, there are sometimes occasions when it is more

expeditious to leave incident clearance until after a peak period rather than deal with it immediately.

We also note that there is no measure of the effect of incidents on non-motorways, These can be equally disruptive (if not more so in some cases due to the absence of any hard shoulder for rapid access to the incident scene by emergency vehicles). We recommend that the KPI be extended to the whole SRN.

Encouraging economic growth

Average delay/vehicle/mile should be disaggregated by broad-brush cause (eg roadworks, incidents and general congestion). Planned roadworks, undertaken in support of other objectives, can increase delay in the short-term but this would not necessarily be a concern. On the other hand, increases in delay due to incidents and congestion in general will be warning signs.

While user delay is an accepted economic disbenefit, the wider role of the SRN in facilitating land-use and economic development should also be recognised and monitored. Highways England will presumably continue to be a statutory consultee re. planning applications impacting on the SRN and its responses could be monitored. The links between land-use development and transport networks are critical to a smooth functioning economy, and Highways England's role in facilitating this (including objecting to developments which are inappropriately sited from a transport perspective) should be monitored.

Delivering better environmental outcomes

Vehicle emissions on the SRN should be estimated and monitored. These are important at a local level in terms of AQMA's and at a national level in terms of the government's climate change and carbon emission objectives. The SRN has a significant impact on air quality and this should not be ignored. Targets should be set for emission levels and performance against national assumptions for reductions in greenhouse emissions should be monitored.

We also recommend that forecast emission changes for future schemes that are at "Preferred Scheme" stage of preparation should be monitored (as extracted from the scheme Appraisal Summary Table) again to check whether the SRN is on track to achieve future targets.

Helping cyclists, walkers, and other vulnerable users of the network

On the non-motorway network, we recommend that the amount of use made of the network by vulnerable users should be monitored. This would ensure that such users are being catered for and would avoid the risk of difficulties for such users appearing to be reduced when in fact all that is happening is that the risks of using the SRN are simply deterring them.

Achieving real efficiency

We have no comment on this point.

Keeping the network in good condition

Emphasis is placed on the pavement but other aspects of the network condition are of equal importance to users such as road markings and signing, including the condition of electronic signing. In the past, we have found that infrequently used VMS are often out of order at a critical time following an incident. We recommend that marking and signing be separately monitored.

Q5 We have set out initial plans for reporting on Highways England's performance and efficiency. Is there further information or analysis that you think we should produce?

We comment on other aspects of Highways England's performance which we consider should be monitored.

Liaison with local highway authorities

Local authority roads and the SRN are perceived by the user as a single network. The management of the network as one is particularly important and it is vital that there is full co-operation to ensure that decisions taken by one authority do not inadvertently and adversely impinge on the other.

Relating back to the performance specification, it is vital that improved performance on the SRN is not achieved simply at the expense of transferring traffic to the local authority network. There will be times when it is necessary to do so on a temporary basis but this must be agreed either in advance or, in the case of an emergency, at the time. Equally, it would be unfair on Highways England if a local authority were to cause traffic to be diverted to the SRN without prior agreement.

Highways England should be required to formally liaise with local highway authorities and consult with them re. day-to-day network operation and scheme development, and the effectiveness of this should be monitored.

Skills development

Our comment applies particularly to transport planning skills. Our profession has become concerned about the loss of expert skills over the years from the former Highways Agency, resulting in the SRN development being driven by budgets and deadlines without necessarily the appropriate technical input. We recommend that the skills base within Highways England is assessed and that targets for strengthening it where necessary are set and monitored. In our own profession, we would like Highways England's recognition of the

Transport Planning Professional (TPP) qualification to be monitored as a means of ensuring that its transport planners are of an approved level of competence.

Q6 Is there specific information relating to Highways England which is not currently in the public domain which you think should be prioritised for publication?

We comment on the following.

Disaggregated traffic data

There is a lack of understanding about the components and drivers of traffic growth on the SRN (and, indeed, on other networks) which is an essential starting point for forecasting future changes in traffic. We recommend that traffic flow data should be monitored and disaggregated by vehicle type such as coaches, different types of HGV (rigid/artic, number of axles), LGVs and cars. Much of this data is already available but tends to be presented at an aggregate level only. Propulsion type and use will also be critical for calculating emissions, and for forecasting the effects of the government's Ultra Low Emission Vehicle targets. Goods vehicle data is important for SRN planning – for example, weight is useful and can be collected without stopping vehicles.

Traffic flow characteristics

For planning future RIS's, there is a need to monitor more closely journey patterns on the SRN as well as journey times and journey time variability. The use of anonymised GPS data should be of great help for journey pattern analysis and can be used to provide greatly improved measures of journey times and of variability within and between days to generate good time series data. Volatility can then be seen in relation to time of travel and the impacts of roadworks or incidents.

Traffic model performance

Most SRN developments are designed and appraised on the basis of traffic model output. We have already (Question 3) referred to the need to make modelling more robust and an important element of that is monitoring the outcomes of SRN development against forecasts. There is already substantial data available from the POPE process but further results should be made more readily and quickly available. Differences between forecasts and outturns can then be reviewed and used to refine the modelling process.

In conclusion

We have commented on selected aspects of the consultation document which are particularly relevant to transport planning. We are happy to continue to be involved in the discussions to develop the monitoring undertaken by ORR so as to ensure that best value is achieved from the funds allocated to Highways England, and that the development of the SRN is undertaken in the broader context of good transport planning.