

Introduction

1 What is your name?

Name:
Chris Todd

2 What is your email address?

Email:

3 What is your organisation?

Organisation:
Transport Action Network

Consultation Questions

4 Would you like your response to be confidential?

No

5 Do you agree or disagree with the proposal to designate National Highways as a "Relevant Public Authority"? Do you:

Strongly agree

6 Please set out any evidence you wish to provide in support of your answer to question 5).

Free text response:

National Highways is responsible for a large number of roads passing through or close too large settlements such as along the south coast, Reading, Bristol, Birmingham, Manchester, London, etc. These can be significant sources of air pollution for the surrounding areas which National Highways has to date done little about.

National Highways (Highways Agency as it was then) reluctance to take any responsibility for local exceedances along the M4 corridor was evident at the Examination on the M4 J3 - 12 Smart motorway where it resisted monitoring and an action plan being established if air pollution was bad enough to require further mitigation. Ultimately this was imposed as part of the DCO requirements.

Without the engagement of National Highways and a requirement for them to take action to reduce emissions, local authorities can be severely restricted in their ability to take meaningful action. It's not just about the traffic on the Strategic Roads Network but the extra traffic that the SRN generates on the surrounding road network.

7 Do you agree or disagree that designating National Highways as a "Relevant Air Public Authority" would increase the effectiveness of local air quality management?

Strongly agree

8 What do you think of the draft statutory guidance "working with National Highways" (please see Annex A)? Please set out any comments or suggested improvements you think we should consider.

Free text response:

The current text is good as far as it goes, but it focusses solely on traffic on the SRN. For example it states: "In the event of source apportionment identifying transport on the SRN as contributing to an exceedance, or likely exceedance, of an air quality objective the LA should contact NH."

As we stated above, the SRN can generate traffic on the wider road network, so consideration of National Highways' responsibilities needs to include traffic it is encouraging on the wider road network as a result of, or impacted by, the SRN.

Addressing problems this causes might then require some demand management measures to be implemented, or road capacity increases to be abandoned to help reduce overall traffic and pollution levels quickly enough. Pretending there is no interaction between the SRN and and what might be termed local traffic on the wider road network is unhelpful in delivering a rapid reduction in road emissions.

The wording should be changed to something to the following, or similar:

"In the event of source apportionment identifying transport on, or associated with (e.g. travelling on the surrounding road network, accessing or leaving the SRN), the SRN as contributing to an exceedance, or likely exceedance, of an air quality objective the LA should contact NH."

9 Do you agree or disagree with our assessment of impacts set out in the Regulatory Triage Assessment document (please see Annex B)? Please set out your reasons for agreement/disagreement.

Free text response:

Some of the benefits of traffic reduction are not explicitly mentioned such as increased reliability. Indeed, reliability of a journey is often more important to a business than actual speed / journey time. This should be mentioned in the assessment of impacts.

Another benefit of reduced speed is fewer and less severe crashes which helps reduce overall delays (as well as increasing reliability) and so lower speed limits may not necessarily lead to overall journey time increases. Fewer and less severe crashes also mean less likelihood of diversions of traffic off the SRN onto local roads, where the impact of traffic (and air pollution) is likely to be more severe.

The use of localised road capacity increases to reduce congestion and air pollution is likely to only lead to short term benefits and longer term will only cause more traffic onto the road network, creating further problems across a wider area. Given that the science is pointing to the need for reductions in air pollution far beyond the current legal limits - see latest WHO guideline levels for NO₂ and PM_{2.5} - this should be a consideration in any assessments and action taken. Just treating the symptoms rather than the cause risks perpetuating the problems of bad air, even if the current legal levels might be addressed. This risks pursuing solutions that are not the most cost effective longer term.

10 Do you have any further comments or views on the designation of National Highways as a Relevant Public Authority?

Free text response:

Traffic reduction is the best way of tackling a multitude of environmental and social problems and Government priorities and should be featuring much more prominently in any consideration of solutions and as such is relevant to this consultation.