

**GAP Feedback to Consultation on DfT's Draft Road and Rail Networks National Policy Statement, 26 February 2014**

The following notes provide feedback on behalf of Gateshead Access Panel (GAP) and its members, and refer to sections of the "**Draft National Policy Statement for National Networks**" (the main consultation document of 88 pages) and its related annex documents where appropriate.

GAP is a registered charity and a pan-disability user led organisation.

**4. Consultation questions**

**4.1** These consultation questions are intended to be read with the draft NN NPS and its supporting documents.

**4.2** In responding to each question, please provide comments to explain the reason for your response, along with any relevant data or analysis that supports your view.

**Draft National Networks National Policy Statement**

*The draft NN NPS is at Annex A of this consultation document.*

*Chapter 2 of the draft NN NPS sets out the need for the development of the national networks, and the Government's policy for addressing that need. Chapter 3 sets out wider Government policy on the national networks, covering the environment, safety, technology, sustainable travel and accessibility.*

**Q1.** Does the draft NN NPS clearly establish the need for development of the national networks? If not why not? (see Chapter 2 of the NN NPS)

**Yes.** The draft NN NPS appears to clearly establish the need for development.

**Q2.** Does the draft NN NPS adequately explain the Government's policy for addressing the need set out in the NN NPS? If not why not? (see Chapters 2 and 3 of the NN NPS)

We do not consider the Government's policy and intentions to be adequately expressed within the Government's stated objectives or in the explanation of these objectives as explained below, making reference to the texts in Chapter 2. We believe there needs to be a more directly defined commitment stated within these objectives with regard to equality to give adequate recognition to the need for applicants to address equality, particularly where there are either existing barriers to accessibility for disabled people or to mitigate barriers resulting from and during proposed developments:

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*“The Government will deliver national networks that meet the country’s long-term needs; supporting a prosperous and competitive economy and improving overall quality of life, as part of a wider transport system. This means:*

- Networks with the capacity and connectivity to support national and local economic activity and facilitate growth and create jobs.
- Networks which support and improve journey quality, reliability and safety.
- Networks which support the delivery of environmental goals and the move to a low carbon economy.
- Networks which join up our communities and link effectively to each other.”

There appears to be no reference within the Government’s vision and strategic objectives in regard to equality of opportunity or removal of barriers to social inclusion for people who may need to use the network or be affected by the network and its use. Whilst issues related to equality and social inclusion are referenced later, and appear to be predominantly addressed by making reference to other documents separate to though potentially impacting on this NN NPS. As such, we feel that the importance of equality and social inclusion should be identified and specifically mentioned in this vision statement, as it is an expectation of this NPS.

We also wish to point out that references, such as at 2.15 to “...enhance accessibility for pedestrians and cyclist” does not automatically confer enhancement of equality and social inclusion, although it may provide some improvement; in some situations it could actually work against the safety of access for disabled and older persons or persons with young children, such as where schemes result in unsegregated shared use of routes by pedestrians and cyclists.

In relation to the issue of shared surfaces, greater confidence would be provided to many disabled people, if this NPS stated that any proposed network improvements would not result in shared surface provisions whereby unsegregated use between pedestrians and cyclists results. We do not consider that the current use of tactile warning surfaces can adequately mitigate the hazard to pedestrians in such unsegregated routes, which as such often do not conform to the DfT’s own national guidance on the use of tactile warning surfaces or their guidance on unsegregated routes; yet some highways authorities appear to ignore such guidance based on their consideration of the priority to provide safe routes for cyclists, ignoring concerns of vulnerable groups of pedestrians.

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3.14 makes reference to the need to make junctions safe for cyclists. Whilst we fully concur with such needs, we wish to point out that all too often that such improvements for cycle routes often have a knock-on effect on the location and route for pedestrians. We therefore believe this NPS should recognise the priority of pedestrian safety, which particularly impacts on older and disabled people as well as young children, to confer the requirement that any schemes to improve the safety of access for cyclists and other road users gives priority to the need to avoid the creation of barriers to ease of access and safety for pedestrians, and wherever possibly provides enhanced ease and safety for pedestrian access.

3.17 states:

“The Government expects applicants to look for opportunities to improve access for all on and around the national networks by designing and delivering schemes that take account of accessibility and the diverse requirements of users, and through delivering small-scale improvements that improve accessibility and reduce community severance, where that is appropriate.”

We consider this statement to be weakened in its intentions, by virtue of the phrase “The Government expects applicants to look for opportunities...”. This does not appear to confer a “requirement on the applicant” or a “commitment by the Government” to “improve access for all”.

We therefore respectfully suggest this wording requires revision to confer a requirement on applicants to:

- look for such opportunities with schemes;
- to seek specialist advice on what opportunities may exist locally;
- to involve relevant community representatives including those representing disabled and older persons, cyclists, children and young persons;
- to identify what advice has been taken; and
- to identify what opportunities have been given consideration; and
- to identify why any opportunities may have been discounted.

*Chapter 4 of the draft NN NPS sets out assessment principles and Chapter 5 sets out guidance on generic impacts.*

**Q3.** Do the Assessment Principles provide adequate guidance to the Secretary of State on how he should assess applications for developments of the national networks? If not why not? (see Chapter 4 of the NN NPS)

In relation to the assessment of criteria for “good design” as discussed at 4.26 – 4.30, we consider there should be a requirement for the applicant to identify what

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engagement has taken place with local communities that will be affected by the proposals, and in particular who they have consulted and how this has been used in developing the proposals. Such engagement should include all groups of road, rail and highway users who are likely to be affected, and should include local representatives for disabled people for whom the impact of infrastructure changes relating to transport and routes are likely to have a higher potential impact.

**Q4.** Does the draft NN NPS give appropriate guidance to scheme promoters? If not why not? (see Chapter 5 of the NN NPS)

Reflecting on our response at Question 3 and the current guidance in the draft NN NPS document, we advise the provision of additional guidance to promoters on the need for engagement with communities, what such engagement should include, and that it should be funded to support the involvement of under-represented groups, particularly recognising that many disability groups including user-led organisations are under-resourced and require support to be included in such engagement: such support may include the cost of transport to attend a meeting or discussion, funding of an assistant to support such attendance, the provision of other auxiliary aids or information in alternative formats, etc.

**Q5.** Does the draft NN NPS consider all of the significant potential impacts of national network development? If not, what other impacts should be included and why? (see Chapters 4 and 5 of the NN NPS)

Whilst “Impacts of transport networks” and mitigation of such impacts are considered and discussed at 5.184 – 5.193, we believe this does not adequately address this matter as 5.184 appears to suggest such impact only require consideration for projects related to “strategic rail freight interchanges (SRFIs) and of construction sites on the networks whilst a scheme is being developed”: this appears to indicate any such impacts are either unlikely or are to be ignored where projects and construction sites are not associated with SRFIs; which cannot be the case. We therefore recommend the intentions of the statement at 5.184 and wording be reviewed and revised more appropriately to include all NN NPS proposals and sites; as the existence of “impacts on transport networks” requires consideration in each and every case on a case-by-case basis taking account of the location and local circumstances.

**Q6.** Does the draft NN NPS give appropriate guidance on appropriate mitigation measures? If not why not? (see Chapter 5 of the NN NPS)

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In regard to the statement on Mitigation at 5.192 and reference to travel planning, we recommend additional guidance be provided to promoters on what should be considered in regard to the needs of disabled people for their access and use of transport networks and routes, to ensure a greater awareness of their needs for access.

### Appraisal of Sustainability

*The draft Appraisal of Sustainability document is at Annex B, C, D and E of this consultation document. A non-technical summary is at Annex F.*

**Q7.** Do you have any comments on the Appraisal of Sustainability of the NN NPS?

From review of the non-technical summary at Annex F, it appears the Appraisal of Sustainability (AoS) has been relatively thorough in utilizing the criteria listed for the assessment. However, we believe the list of AoS Objectives in Table 2 do not give adequate recognition to the need to provide or assess for improvements in accessibility specifically for disabled people. Giving due regard to the current equality duties on public authorities, we believe there should be a specific AoS Objective to:  
 “Improve the access for disabled people to transport and routes.”

### Appropriate Assessment

*The Appropriate Assessment under the Habitats Regulation is at Annex G.*

**Q8.** Do you have any comments on the Appropriate Assessment on the draft NN NPS?

No comment

### General

**Q9.** Please provide any further comments regarding any aspect of this consultation.

Having previously response to earlier DfT consultations, including our most recent responses to the “Consultation on transforming the Highways Agency into a government-owned company, October 2013” and “Consultation on local authority parking, December 2013”, we are most concerned that we are not being made directly aware of new consultations such as this current NN NPS consultation.

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We only became aware of the NN NPS consultation a few days ago, following information circulated by the Access Association.

Being a previous respondent to Government and DfT consultations and an obvious interested party representing disabled people, we consider it important that the Government makes us aware of any new consultations that can impact on environments, facilities and services.

We therefore ask that consideration be given to how we and the Government can ensure greater awareness of such public consultations and preferably that we are contacted directly to have an opportunity to be involved.

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