

# Transport Committee Inquiry on the Strategic Roads Network

Evidence from Campaign for Better Transport, Oct 2013

## Introduction

Since 1973, Campaign for Better Transport has been helping to create transport policies and programmes that give people better lives and support the environment. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

## 1. How will the policies set out in the Government's "Action for Roads" command paper improve the strategic road network for all road users, whilst also improving the environment?

The Government published *Action for Roads* in July 2013, following up the spending plans initially announced in the Spending Round in June and outlined in *Investing in Britain's Future*.

### A) Policies we welcome

These include a renewed emphasis on maintenance, the ability of the Highways Agency to fund projects outside the strategic road network, specific policies on cycling and walking, and a range of initiatives to reduce the environmental and landscape impact of new and existing roads.

### B) An unwelcome (and irrational) return to 'predict and provide'

We are very concerned with several of the assumptions behind the policies in *Action for Roads*:

1. The UK's strategic road network (SRN) is inadequate
2. Traffic growth and new roads to accommodate it are essential for economic growth
3. Forecasts predict traffic will grow rapidly
4. A large road-building programme will reduce congestion in the long term

We will tackle the third assumption in answer to the Committee's third question, below.

The first assumption has been stated repeatedly in recent documents and speeches:

- "The UK is now ranked twenty-fourth in the world for roads"<sup>1</sup>
- "The World Economic Forum ranks the UK 24th in the world for the quality of its road network at the moment"<sup>2</sup>
- "UK is currently ranked 24th in the world for quality of roads"<sup>3</sup>

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<sup>1</sup> Executive Summary, Action for Roads, Department for Transport, July 2013

<https://www.gov.uk/government/publications/action-for-roads-a-network-for-the-21st-century>

<sup>2</sup> Speech, Stephen Hammond, 15 Jul 2013 <https://www.gov.uk/government/speeches/the-governments-plan-for-the-uks-road-network>

<sup>3</sup> Investing in Britain's Future, Treasury, June 2013 <https://www.gov.uk/government/publications/investing-in-britains-future>

However, this statistic turns out to be based on the replies of a sample of company executives to a single survey question in the World Economic Forum's annual Executive Opinion Survey. In 2012, the sample size for this survey from the UK was just 93.<sup>4</sup> In contrast, the much more rigorous and extensive Eddington Transport Study of 2006 found that the UK was very well connected in transport terms, with good networks linking major towns and cities and many alternative routes providing a high level of resilience.<sup>5</sup>

*Action for Roads* provides no evidence for the second assumption above. The whole of Section 1 on 'Roads and the economy' only includes two references to external analyses (the other references are to basic statistics for chart data) and these are both relatively limited surveys of businesses (the WEF and an EEF document based on a survey of manufacturing companies<sup>6</sup>). The Government should be challenged on why it has used such small and narrow range of sources as a key supporting plank for a major new policy and spending programme.

In terms of policies to support economic growth, the Eddington Study also contradicts the assertion that large new road infrastructure will deliver growth, saying: "Today, in mature economies like the UK, with well-established networks and where connectivity between economic centres is already in place, the evidence suggests that there is considerably less scope for transport improvements to deliver the periods of rapid growth seen historically."<sup>7</sup>

Eddington also recognised that congestion is primarily an urban problem and championed smaller, low-cost interventions based on evidence of the benefits of "smarter choices" programmes and the cycling demonstration towns. Since then, the evidence base for this approach has grown rapidly, with the Local Sustainable Transport Fund supporting nearly 100 packages of projects and initial (as yet unpublished) assessments showing very high benefit-cost ratios.

Many UK cities, such as Nottingham, Cambridge and London, have shown that economic and population growth can be achieved without corresponding traffic increases and, across the country, traffic and economic growth have been decoupling since the 1990s.

Other recent evidence comes from the USA where research into stimulus spending has shown that a 'fix it first' strategy is more effective than big new road-building projects at creating jobs.<sup>8, 9, 10</sup>

Even on its own terms, the fourth assumption – that a return to major road building will reduce congestion in the long term – fails to stand up. The new 2013 traffic forecasts and the maps shown in *Action for Roads* predict higher than ever traffic in the future, with a 43 per cent rise in traffic on all roads and a 46 per cent increase on the SRN by 2040. It is clear that no amount of road-building could possibly keep up with this predicted level of demand and that – if the forecasts are believed – policies aimed at reducing demand are the only rational response.

There is no acknowledgement in these new policy documents of the principle of induced traffic or that the new policies, ostensibly designed to tackle growing traffic, will in fact be responsible for making the problem worse. These are not controversial statements to make. These principles have been firmly established since

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<sup>4</sup> Section 1.3 of the Global Competitiveness Report 2012/13, World Economic Forum, May 2012 [http://www3.weforum.org/docs/WEF\\_GlobalCompetitivenessReport\\_2012-13.pdf](http://www3.weforum.org/docs/WEF_GlobalCompetitivenessReport_2012-13.pdf)

<sup>5</sup> Eddington Transport Study Volume 1, Department for Transport, 2006

<http://webarchive.nationalarchives.gov.uk/20090104005813/http://www.dft.gov.uk/about/strategy/transportstrategy/eddingtonstudy/>

<sup>6</sup> EEF Transport for Growth, April 2013 <http://www.eef.org.uk/NR/rdonlyres/43C9E81E-D27B-454C-97FB-05493949E368/22348/TransportforGrowth2.pdf>

<sup>7</sup> *ibid*

<sup>8</sup> The Best Stimulus for the Money: Briefing Papers on the Economics of Transportation Spending. Nelson AC et al, April 2009 <http://stimulus.smartgrowthamerica.org/484>

<sup>9</sup> Transportation Funding and Job Creation. Smart Growth America, February 2011

<sup>10</sup> An Economic Analysis of Infrastructure Investment. Department of the Treasury with the Council of Economic Advisers, October 2010

the first SACTRA report was published in 1994<sup>11</sup> and it is much more controversial that the Government appears to have forgotten them.

### **C) Environmental impact**

The planned expansion of the SRN would have a huge impact on the environment, with new land required for bypasses and widening projects. Particularly worrying is the proposal for a new 'expressway' standard – effectively a policy for the long-term dualling of most of the network. With Campaign to Protect Rural England, Friends of the Earth, Greenpeace, the Wildlife Trusts, Woodland Trust and RSPB, we recently warned of the potential impact of this on National Parks, AONBs and the World Heritage Site at Stonehenge.<sup>12</sup>

We have also warned about the impact of two major current Highways Agency proposal on air pollution. Our submissions to the A556 Knutsford to Bowden Improvement examination and the A14 route consultation show these projects are likely to raise pollution above EU legal limits.<sup>13, 14</sup> This issue has been given greater urgency by the UK Supreme Court ruling in May 2013 that the Government is failing in its legal duty to protect people from the effects of dangerously high air pollution.<sup>15</sup>

### **D) Effects on local roads**

While acknowledging that locally managed roads make up ninety-eight per cent of the network, *Action for Roads* fails to recognise that a policy which increases traffic on the SRN would have a huge knock-on effect on local roads, increasing congestion in towns, cities and rural areas around the SRN. In many cases, the expansion of the SRN close to urban areas would be in direct contradiction with local policies intended to reduce the need to travel and reduce road traffic.

## **2. How does the Government's policy for roads link with planning for other transport modes?**

We welcome the new ability of the Highways Agency to invest outside the SRN. However, the strategies outlined in *Action for Roads* and the work that has taken place so far on the new Route Based Strategies do not demonstrate that the Government is working towards better integration between modes or collaboration with other departments.

### **A) Link with rail?**

We strongly support closer links between strategic road and rail investment programmes. However, despite the switch to longer term funding for the Highways Agency, and the similarity of the funding period covered by *Action for Roads* and the current HLOS period, there is no evidence for proposals being put together in conjunction with Network Rail or using information from them. Our campaigners have taken part in the recent Route Based Strategy workshops (covering 18 routes across the SRN). These seek to establish the 'problems and opportunities' faced by each route but the maps provided only include roads and don't even feature current rail lines, let alone planned improvements.

### **B) Link with buses?**

The focus in recent budgets has been for revenue spending to be cut while capital spending is increased. This means that, except for a small number of capital schemes, buses have suffered cuts due to lower local authority budgets and a reduction in the Bus Service Operators Grant. *Action for Roads* acknowledges in

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<sup>11</sup> Trunk Roads and the Generation of Traffic. Department for Transport, 1994  
<http://webarchive.nationalarchives.gov.uk/20120830120423/http://www.dft.gov.uk/publications/trunk-roads-and-the-generation-of-traffic/>

<sup>12</sup> Charities warn National Parks under threat from Highways Agency dual carriageways,  
<http://www.bettertransport.org.uk/media/15-july-NGO-roads-map>

<sup>13</sup> Response to Examining Authority's First Questions and first Written Representation on the A556 Knutsford to Bowden Improvement, Campaign for Better Transport, October 2013  
[http://www.bettertransport.org.uk/files/CfBT\\_A556\\_WR1\\_final\\_071013.pdf](http://www.bettertransport.org.uk/files/CfBT_A556_WR1_final_071013.pdf)

<sup>14</sup> A14 plans could breach EU air pollution limits, Campaign for Better Transport, October 2013  
<http://www.bettertransport.org.uk/media/16-10-2013-A14-air-pollution>

<sup>15</sup> <http://www.healthyair.org.uk/clientearth-triumph-in-the-supreme-court/>

bullet points on the benefits of roads that they are "vital for those travelling by bus or bicycle" and mentions that some pinch-point schemes will improve bus priority at junctions. However, there is no section covering measures to support public transport on the SRN, despite the potential for express coaches (for example), to reduce congestion.

### **C) Link with active travel and smarter choices?**

Policies on smarter travel, travel planning and demand management are completely absent from *Action for Roads* and there is only a brief mention of the LSTF (in the section on walking and cycling). Whilst we welcome the new cycling feasibility studies, there is a huge missed opportunity for active travel and smarter choices programmes to relieve pressure on the SRN, particularly on congested stretches around cities.

### **D) Link with planning policies?**

A new circular on how the Highways Agency engages with the planning system was published in 2013.<sup>16</sup> We welcomed some aspects, such as the Highways Agency having a role in both the plan-making and decision-making stages of the planning process. However, we also urged that the programme requiring travel plans for developments near the SRN should be reinstated.

### **E) Cross-departmental objectives**

We and others have made the case for greater collaboration between departments, for example with the Department of Health on active travel, DECC on climate change emissions, Defra on complying with legal requirements on air pollution or DWP on access to work and training.

An example of a possible collaboration is the Active Travel Fund proposed by a range of groups in the run up to the Spending Round. This fund could combine a share of the transport budget with contributions from public health funds.

## **3. How reliable is the Government's forecast for growth in demand for the strategic road network? How should the Government deal with uncertainty in its forecast?**

We have challenged the reliability of the Government's traffic forecasts for many years, and have been disappointed with recent responses to these challenges. DfT maintains that its forecasts are fit for purpose, despite evidence that they have overestimated demand since the end of the 1980s.

### **A) Why traffic forecasts matter**

The problem with over-estimating traffic growth lies not only in how forecasts are used to support policies of 'predict and provide' (in fact they could equally support urgent policies of traffic reduction) but also in how they underlie economic cases for schemes and lend systematic support to projects that add road capacity.

The WebTAG method of assessment – in particular the way cost-benefit ratios are calculated – relies heavily on forecasts of traffic growth. Time savings often constitute eighty to ninety per cent of the calculated benefits of a scheme (the controversial Bexhill-Hastings Link Road is a typical example at 84%<sup>17</sup>) and these time 'savings' are calculated against what is predicted to be the case with no scheme in place. It is mainly because strong long-term traffic growth is predicted that time savings tend to dominate BCRs.

### **B) Recent changes in traffic trends**

Traffic in Great Britain has diverged from historical trends in the past two decades. There has been a flattening of growth since the 1990s; a plateau/peak in the mid-2000s followed by a decline; then a flattening

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<sup>16</sup> Strategic road network and the delivery of sustainable development, Department for Transport, September 2013 <https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development>

<sup>17</sup> Review of the transport business case for the Bexhill-Hastings Link Road. Urban and Regional Policy, October 2011 <http://www.bettertransport.org.uk/files/bhllr-aws-rpt14oct2011-final-pdf.pdf>

off of this decline since around 2010. DfT traffic statistics for 2012 show that the total amount of traffic is now below that of 2003.<sup>18</sup>

The most recent National Travel Survey (NTS) illustrates how driving patterns are changing on a per-person basis. Key results include.<sup>19,20</sup>

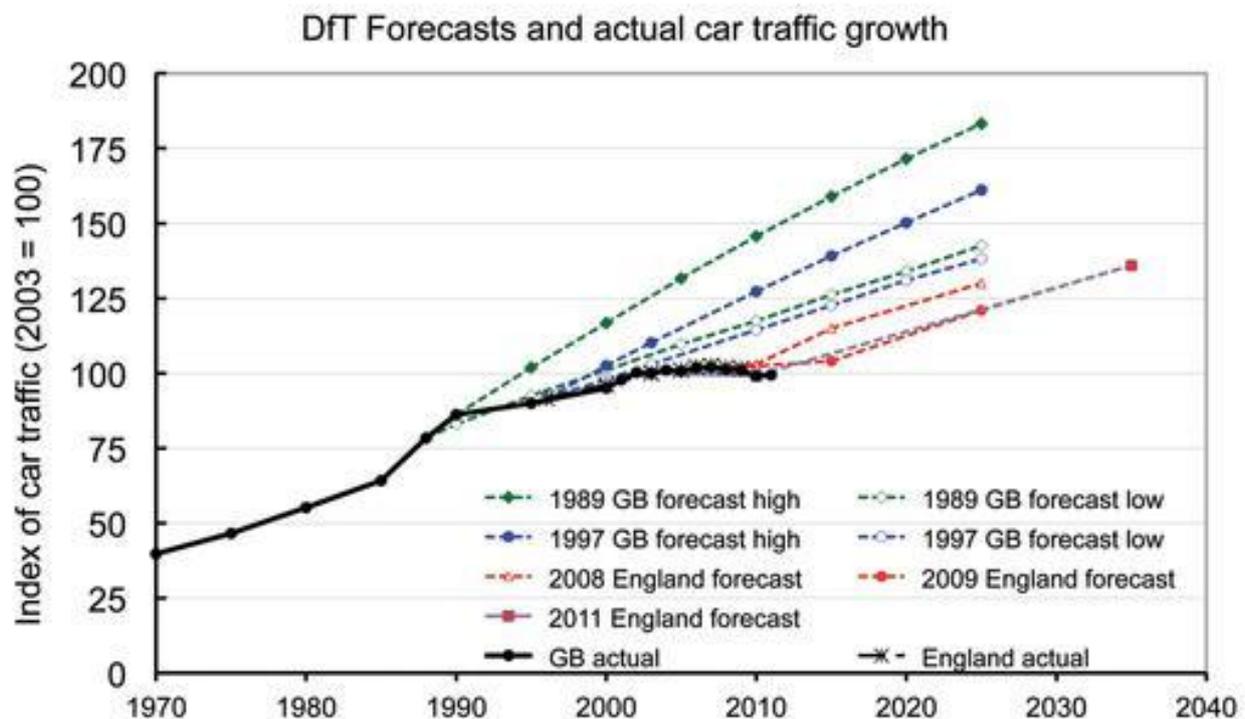
- The number of trips per person (by any mode) has been in steep decline since 1997 – down 12% over this 15 year period.
- Car travel is also down. The distance travelled per person per year is 4% below 1997 for all modes of transport and 7% below 1997 for driving in a car or van.
- The average distance travelled per car has fallen 11% since 2002
- Car ownership levels are now lower than in 2005 at 1.13 cars per household (in 2005 it was 1.15 cars per household)

These trends all call into question the wisdom of building new roads now. Congestion and traffic are below what they have been at their peak, with several years of growth needed just to bring them up to levels that have previously been experienced. Far better to take advantage of the 'breathing space' provided by the recent trends to support sustainable transport alternatives.

### C) Problem with the accuracy of recent forecasts

DfT forecasts have over-estimated traffic growth since the 1980s, particularly when it comes to long-term trends.

**Fig 3.1: Performance of DfT traffic forecasts since 1989**



The chart in Fig 3.1 shows a comparison of traffic in England with forecasts from 1989 to 2011.<sup>21</sup> DfT contends that the accuracy of its forecasts is better than implied by the chart above by including earlier forecasts in its own reports and describing forecasts since the early 1970s as "generally under-forecasted",<sup>22</sup>

<sup>18</sup> Department for Transport road traffic statistics 2012, table TRA5102

<https://www.gov.uk/government/organisations/department-for-transport/series/road-traffic-statistics>

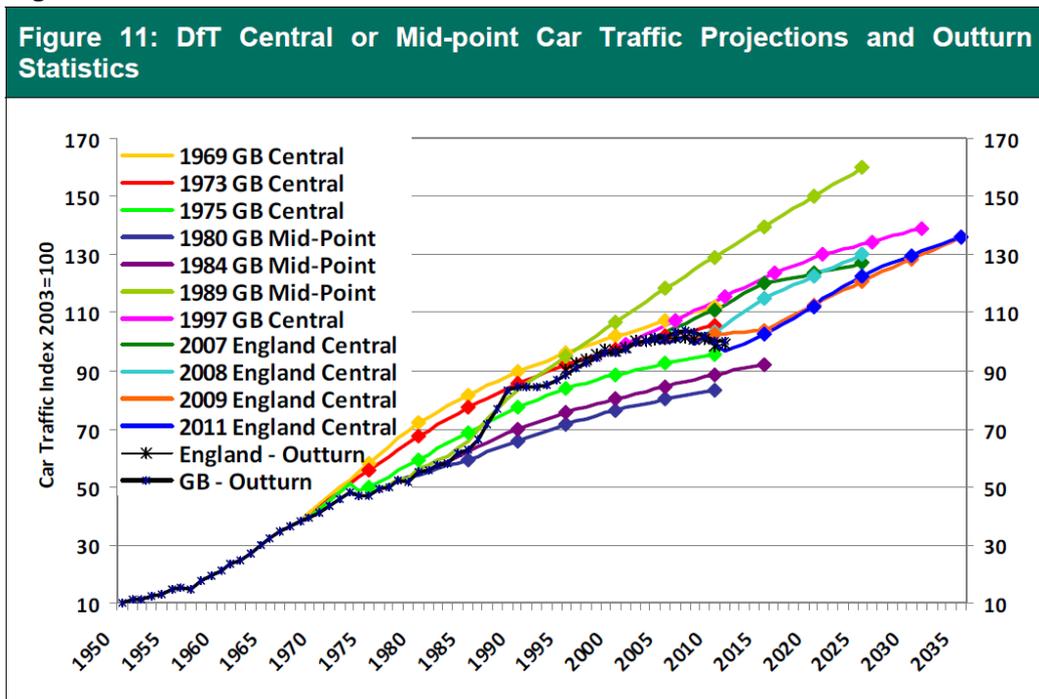
<sup>19</sup> National Travel Survey statistics <https://www.gov.uk/government/organisations/department-for-transport/series/national-travel-survey-statistics>

<sup>20</sup> Campaign for Better Transport briefing on the National Travel Survey, July 2013

[http://www.bettertransport.org.uk/files/CfBT\\_NTS\\_2012\\_new\\_data\\_FINAL.pdf](http://www.bettertransport.org.uk/files/CfBT_NTS_2012_new_data_FINAL.pdf)

<sup>21</sup> Due diligence, traffic forecasts and pensions, Goodwin P, LTT April 2012, <http://www.bettertransport.org.uk/campaigns/roads-to-nowhere/ltt-130412>

Fig 3.2: DfT forecasts vs outturn chart



In Fig 3.2 over-forecasting in recent years is obscured by the longer timescale and large point markers, but it can be seen that the closest fit to the long term trend up to 2005 is the 1973 forecast and that the even lower gradient of the post-oil crisis 1975 'under' forecast is about to become the most accurate in the long term. A continuing plateau or decline in line with theories of 'peak car' would see the outturn line meet the 1980 and 1984 'under-forecasts' by around 2020, but none of the DfT's current scenarios produce figures even close to these possibilities.

Another crucial issue is that – whether accurate or not – these forecasts are unsustainable: if road travel were really to grow as forecasts predict (a 43% increase in road traffic by 2040), climate change targets will be impossible to meet and, however much we expand roads, congestion will get worse.

#### D) Problems with the underlying National Transport Model (NTM)

The main problems with the methodology behind forecasts and the underlying NTM are the limited number of 'key drivers' and a number of out-of-date assumptions.

Road Transport Forecasts 2013<sup>23</sup> outlines these three key drivers and their assumed effects on traffic:

- **Population**
- **Economic Growth**
- **Cost of Driving**

As the NTM is a closed model, it is not possible to interrogate its detailed workings. However we believe that the National Trip End Model (NTEM) does consider factors such as population density, new developments and demographics in working out local variations in demand for travel by car, but that ultimately these are 'constrained' or adjusted to fit in with the macro picture determined by these three factors.

By using so few factors in estimating macro-level changes in demand, the forecasts ignore how open to question future behaviour is and leave aside a range of important nationwide changes in technology,

<sup>22</sup> Road Transport Forecasts 2013. Department for Transport, July 2013  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/225483/road-transport-forecasts-2013-extended-version.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/225483/road-transport-forecasts-2013-extended-version.pdf)

<sup>23</sup> Road Transport Forecasts 2013. Department for Transport, July 2013  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/225483/road-transport-forecasts-2013-extended-version.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/225483/road-transport-forecasts-2013-extended-version.pdf)

demographics and land-use. These failings are acknowledged in the chapter 'Uncertainty and modelling' in the forecast documents, but they are currently not used to alter the model:

- **Changes in technology and connectivity that affect behaviour** – especially relevant to the steady reduction in trip rates seen since 1997
- **Changes in culture between generations** – younger people are currently assumed as they age to adopt the driving patterns of people in today's older age groups. It is much more likely that people raised since the 1990s will have different driving habits to those growing up in the 1970s or 1950s.
- **Changes in town planning** – for example the 'town centre first' planning policies that are attributed to a proportion of the reduction in driving seen in the 'On the Move' report (see next section).

### **Out of date assumptions**

The following assumptions are also out of date. There are plans to update these in the near future, but this is not represented in the 2013 forecasts upon which the policies in *Action for Roads* rely.

- **Trip rates** – the 2013 Road Transport Forecasts document admits that trip rate data is based on NTS results from 1988-96 and that they are assumed to be constant over time for each type of person (split according to age, car ownership and employment)<sup>24</sup>
- **Population distribution** – the NTEM uses ONS population projections from 2010.<sup>25</sup> These are in turn based on data from the 2001 census. The next set of detailed data on population, from the 2011 Census, is likely to show a higher level of overall population growth but a very different distribution, focused mainly on larger cities that have lower cultural and practical levels of car use and better public transport.

### **E) Policy changes needed**

DfT should hold a root and branch review of the processes of appraisal and forecasting. This would have three aspects, including – importantly – the opening up of the new NTM:

1. **Full review of appraisal and the NTM**
2. **A new simpler, publicly owned NTM**, built to match the results of the review and available on an open licence for interested parties to interrogate and experiment with (for example by altering the underlying assumptions)
3. **The wider use of scenarios in appraisal**, not just in the production of the forecasts. The range of scenarios should include a comparison of the benefits of schemes with the current situation, not just with a range of predicted 'do minimum' futures

We have requested the opening up of DfT models to match practices in the Treasury for some economic models. However, we have been told that issues of complexity – the merging and linking of many different data models – and the inclusion of proprietary software prevents this with the NTM.

## **4. How can we improve the reliability and efficiency of travel on the strategic road network? What impact will new technology have?**

We welcome this question – WebTAG gives priority to maximising even small time savings but surveys show people and businesses most want reliability. We believe that technological innovation can help provide this and relieve a number of current problems on the SRN. These include:

- Congestion at peak times, especially close to urban centres
- Safety
- Community severance, social and environmental impacts of existing roads

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<sup>24</sup> Road Transport Forecasts 2013. Department for Transport, July 2013  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/225483/road-transport-forecasts-2013-extended-version.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/225483/road-transport-forecasts-2013-extended-version.pdf)

<sup>25</sup> *ibid*

### A) Congestion around urban areas

On congested sections of the SRN, current (and more advanced) ITS aspects of the Managed Motorway (and new 'Smart Roads') schemes can do much to manage congestion, reliability and driver information via variable speed limits and improved warning and information signs.

### B) Safety

Lower or variable speed limits, enforced by average speed cameras, may also be suitable for improving the safety record of busy parts of the SRN as well as many rural single carriageway A roads, on and off the SRN.

### C) Community severance, social and environmental impacts of existing roads

The Highways Agency is working to improve its environmental record, and there are some welcome references to this in *Action for Roads*. We also welcome the start of a cycling project pipeline. This is currently, however, a slightly piecemeal process and could be much better integrated with other initiatives including the pinch-point programme, maintenance and major projects.

There is also enormous scope (with additional funding being provided to the Agency) for a much more extensive 'retrofitting' programme to tackle the environmental and social problems caused by the network in a much more concerted way. However, evidence of the first *Performance Specification* for the Highways Agency for 2013-15 is not encouraging.<sup>26</sup> Only two requirements (on noise and air quality) cover effects on the environment and wider community, with no measures for the social effects of new roads. Carbon measures are limited to cuts in the operational carbon footprint of the Agency not the network's wider contribution to the national carbon budget.

## 5. What mechanisms are there for Government to increase investment in strategic roads and attract new investors? Are there good examples from other countries that could be applied in the UK?

Our 2012 report *Problems with private roads* looked at the issue of attracting private finance into road building and management,<sup>27</sup> considering the range of models then being discussed by the Government. This concluded, for each model:

- **Toll funding:** the need for large guarantees to mitigate high risks for private investors, including over-optimistic traffic forecasts, low public tolerance for tolls, a network with many alternative routes.
- **Shadow tolls:** the huge cost to the public purse of these PFI-style schemes.
- **Hypothecation of part of VED as a source of income:** this would have major regulation issues, and the Treasury normally avoids hypothecation because of the need for ministers to have discretion to set priorities for spending tax revenue under a democratic framework.

On toll roads, the Government has also experienced real difficulties. The two potential projects so far mooted to be funded through tolls – the M4 Relief Road in Wales and the A14 in Cambridgeshire – have proved deeply controversial.<sup>28, 29</sup> Finding private investors for anything less costly than PFI-style schemes will depend on finding or developing a revenue stream from drivers, but all the models described above have also proved very unpopular with the public.<sup>30</sup>

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<sup>26</sup> Strategic Road Network Performance Specification 2013-15, Department for Transport, April 2013  
<https://www.gov.uk/government/publications/strategic-road-network-performance-specification-2013-to-2015>

<sup>27</sup> Problems with private roads, Campaign for Better Transport, August 2012  
[http://www.bettertransport.org.uk/files/admin/Problems\\_with\\_Private\\_Roads\\_FinalWeb.pdf](http://www.bettertransport.org.uk/files/admin/Problems_with_Private_Roads_FinalWeb.pdf)

<sup>28</sup> M4 relief road: Chancellor 'to approve toll plan' BBC News 2 April 2013 <http://www.bbc.co.uk/news/uk-wales-21999518>

<sup>29</sup> Toll roads don't add up. Campaign for Better Transport, November 2012  
<http://www.bettertransport.org.uk/blogs/roads/281112-a14-tolls>

<sup>30</sup> YouGov/Sunday Times survey results, February 2013

[http://cdn.yougov.com/cumulus\\_uploads/document/zo540gm94e/YG-Archive-Pol-Sunday-Times-results-08-10213.pdf](http://cdn.yougov.com/cumulus_uploads/document/zo540gm94e/YG-Archive-Pol-Sunday-Times-results-08-10213.pdf)

## **6. How should the Highways Agency be reformed to make it "the world's leading highway operator"? What roles should Government and the private sector play to ensure better management of the strategic road network?**

Our response to Alan Cook's review of the Highways Agency, *A fresh start for the strategic road network*,<sup>31</sup> welcomed its emphasis on better managing the network rather than major expansion.

However, we had serious doubts about taking primary responsibility for the SRN away from the Secretary of State for Transport.

Another concern was the proposed remit for the DfT as a 'champion of road users'. The response of the then Secretary of State to this proposal was relatively robust, saying:<sup>32</sup>

"We accept this recommendation though with some qualifications. It is clearly important for the Government to represent the interests of road users as, in the absence of a commercial relationship between drivers and the network operator, customers rely on the Government to feed back their concerns and represent their interests. However, in order to reach balanced and well informed decisions, the Government also needs to take full account of all stakeholders in the roads, including the wider community that this network serves."

However, it appears these qualifications have not emerged intact from the processes that led to *Action for Roads*.

Finally, we question whether all the aims for the new roads strategy given in the Secretary of State's response to Cook are in fact being delivered.<sup>33</sup> These aims included demand management, but there is no sign of policies for managing demand in *Action for Roads*.

**October 2013**

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<sup>31</sup> A fresh start for the Strategic Road Network, Department for Transport, November 2011 <https://www.gov.uk/government/publications/a-fresh-start-for-the-strategic-road-network>

<sup>32</sup> Roads reform - a fresh start for the strategic road network: government response and feasibility study terms of reference, Department for Transport, May 2012 <https://www.gov.uk/government/publications/roads-reform-a-fresh-start-for-the-strategic-road-network-government-response-and-feasibility-study-terms-of-reference>

<sup>33</sup> Section 2.7 'Aims for the new roads strategy' from 32