

The Rt Hon Justine Greening MP

Secretary of State for Transport
Department for Transport
Great Minster House
33 Horseferry Road
LONDON SW1P 4DR

7 February 2012

Dear Ms Greening,

Response to the Cook report on managing the strategic road network

We understand that you are currently considering your response to this report and will be producing this in the coming weeks. We are writing to you to say that, while we can support and welcome some of the recommendations made – in particular that the focus should be on managing the network better, rather than major new roads – we have serious concerns about other recommendations in the report.

Our principal concern goes to the heart of the report's recommendations: while improvements should be made to transparency and accountability within the Highways Agency and a clearer brief provided, we believe that the Secretary of State should retain primary responsibility for strategic decision-making about the road network, and that the agency model currently employed should be retained, with these improvements.

We also have real concerns about the narrow scope of the proposed remit for the Department for Transport as a 'champion of road users'. This approach threatens to ignore both the conflicting interests of different road users and the wider impacts of roads on all members of society and the environment. Similarly, we would urge that any new outcome-based specification for the Highways Agency is expanded from what the report recommends to include a much wider range of environmental and social goals.

Below, we have set out these concerns in more detail in a joint response from Campaign for Better Transport and Campaign to Protect Rural England to the eight recommendations made by the Cook report.

We hope you will find these comments useful in formulating your response, and in deciding how to proceed with any changes to the Highways Agency. We would also be very happy to meet with you to discuss these issues further.

Yours sincerely,



Shaun Spiers
Chief Executive, Campaign to Protect Rural England



Stephen Joseph
Chief Executive, Campaign for Better Transport

cc Patricia Hayes, Director, Roads, Department for Transport

Comments on the individual recommendations of the Cook report, from Campaign for Better Transport and Campaign to Protect Rural England

Recommendation 1: A long-term strategy for motorways and trunk roads

We agree with the need for a long-term strategy for these roads, and would welcome a role in shaping this, as we believe strongly that this strategy should be based on the overall priorities and goals of the Government, with full reference to climate change and other long-term commitments.

The strategy should also be mindful of the painful lessons learned in previous decades of road planning, in particular the failures of 'predict and provide' and the well-established evidence that major road building does more to fuel traffic growth than it does to contain it. The forthcoming National Policy Statement on National Networks could fulfil the role of such a strategy.

Another important consideration is that the current National Transport Model continues to predict large increases in road traffic when recent evidence shows that traffic is reducing, and that growth in volume has decoupled from both population and economic growth. A long-term strategy formulated now runs the risk of being based on out-of-date predictions and such a strategy could result in large amounts of public and private money being wasted on new roads that are not necessary, and which will undermine the growing trend for less car travel and the use of more sustainable modes.

Any strategy needs to acknowledge that the NTM represents just one possible future scenario, and that future demand for transport is not fixed but will be affected by factors that are under the influence of public policy (such as planning policy, the use of demand-management measures, and tax and spending policies that influence relative pricing) as well as factors that are outside this influence (such as fuel prices, conflict in oil-producing areas, and the general state of the economy).

A strategy that recognised this would not be a passive one, asking "*how do we meet this rising demand and accommodate X vehicles by 2025?*" but a more dynamic, scenario-based strategy that considered a range of possible futures. These scenarios could then be used to test proposed changes to the network for effectiveness and resilience against different future situations.

Recommendation 2: An outcome-based specification for the next five years

A specification for the network based on outcomes could be a very useful improvement, but a wider range of outcomes should be included in the specification than those listed in the report (the report includes network capacity and performance, environmental and safety standards, and financial efficiency).

Journey reliability is known to have greater importance for travellers than small time savings, particularly for businesses, and should be included as an important primary aim of the network within this specification.

'Environmental standards' in this context does not refer specifically to climate change. However, the government has a legal commitment in the Climate Change Act to an 80% reduction in carbon emissions by 2050, in which transport has a key role to play. Actions by the Highways Agency can have a large effect on levels of these emissions so carbon targets should also be included in the specification.

Other outcomes that should be included are:

- Air quality, and the impact of the network on the UK's ability to meet EU standards
- Noise, including impacts on areas of tranquillity
- Social and distributional targets

- Accessibility to people with different capacities and needs
- Affordability and issues of transport poverty

Recommendation 3: Ministers and the DfT to focus on a distinctive new role as the champion of road users

As set out in our response to recommendations 6 and 7, we believe that the Department for Transport and the Secretary of State should remain the primary strategic decision-maker in relation to the road network. However, should the DfT take on a less supervisory role, with the Highways Agency fulfilling long-term goals set by the DfT in relative freedom, it is crucial that a more balanced remit is proposed for the role of the Department.

The Department for Transport's vision is *"for a transport system that is an engine for economic growth, but one that is also greener and safer and improves quality of life in our communities"* so any new role for the Department in relation to the Highways Agency should be consistent with these aims.

The proposal that the DfT should be the *"champion of road users"* sounds attractive but runs the risk of being too simplistic. The aim of the Highways Agency's work should be to find the best solutions that consider the different needs of different road users (such as those using cars, HGVs, coaches, motorcycles, cycles and horses, as well as those on foot and the needs of communities adjacent to trunk roads).

This approach also ignores the numerous effects of road transport and road-building on the wider population and the countryside. Ministers, in setting goals for the Highways Agency should not, as the report states *"focus their efforts on the best possible outcomes for road users"*, but on the best outcomes for the UK as a whole, with regard to social, economic and environmental goals and the effects of policies in the long term.

Recommendation 4: A five year funding package, with commercial freedom within this budget for the network manager

Greater clarity over long-term funding for the implementation of a motorway and trunk road strategy has merit. However, the proposed commercial freedom given to the network manager is likely to be at the expense of transparency and the limited current processes of consultation with people in local areas who will be affected by individual changes.

In fact, the provision of long-term funding offers the opportunity to consult more thoroughly and more widely when funding decisions are made than is currently the case. As with the current review of its programme, the Highways Agency has not up to now been obliged to consult the public and other stakeholders before changing priorities for funding major projects, and this approach contrasts with the way the DfT and the former regional bodies have conducted their own processes for major schemes. Wherever possible, local communities and the wider public must have a say in both funding and planning decisions for major transport schemes, and this principle should be built into any new framework for the Highways Agency.

Recommendation 5: Examine the business case for new roads as private toll roads first

We welcome the acknowledgement in the report that the UK's road network is extensive already and that the focus should be on managing and improving existing routes. However, we are sceptical about private toll roads for the UK and are concerned that promoting such a model may result in many miles of highly unnecessary new highway through the countryside that will do enormous environmental damage while not even making a profit for investors.

The highly interconnected nature of our existing roads, providing UK road users with alternatives to any paid-for route, is just one reason why new toll roads would not be viable in the UK. Campaign for Better Transport recently warned of the risks to investors. In a briefing, it was pointed out that these risks included:¹

- Uncertainty about timescales for regulatory approval and delivery of the new infrastructure, caused by community opposition
- The need for large guarantees from local or national governments to make these investments attractive, which are vulnerable to political changes
- The unpopularity of road pricing of any kind in the UK
- Evidence that forecasts for traffic on existing toll roads worldwide are over-optimistic

Recommendations 6 and 7: Change the Highways Agency to reflect other infrastructure companies with greater independence from Government

For the foreseeable future, the only significant funder for the Highways Agency is likely to be taxpayers via the Government and therefore the current agency model – with the Department for Transport as the primary strategic decision-maker – has many advantages, giving clear responsibilities to Ministers and Parliament, and to the Departmental Accounting Officer for the spending voted to the DfT by Parliament.

That said, we would like to see several improvements in the way the Highways Agency operates, particularly around transparency in the selection and prioritisation of schemes within the roads programme, and the relative opacity of the Agency's current brief. Our responses to recommendations 2, 3 and 4 set out several ways in which these areas could be improved.

However, we do not believe that the Cook report has made a sufficient case that the model itself results in problems that would justify such a change, and seeking to find a model from other sectors with different models of funding for infrastructure could lead to complex structures lacking clear lines of democratic accountability, which would not be fit for purpose.

Recommendation 8: Development of route-based strategies

We consider this approach to be broadly positive, but would strongly recommend that the strategies are not based only on long-distance 'routes' but around much wider 'corridors' that recognise the very large effect that the configuration and use of the local road network and area-wide transport policies have on each part of the strategic road network.

These strategies would look at the full range of multi-modal trip options available in the corridor and the real-world 'end to end' journeys made by travellers and goods, including the effects of local planning and sustainable transport policies on mode choice and congestion. Last year's Local Transport White Paper highlighted the success of the Highways Agency's *Influencing Travel Behaviour* programme, which secured benefit-cost ratios as high as 13:1. As well as the welcome aim expressed in section 9.21 of the report to exploit "*smarter and better-coordinated traffic management and information services*" to reduce congestion before making the case for major infrastructure changes, there is an equally valid role for behaviour change initiatives to promote other modes of transport and, indeed, alternatives to travel such as teleconferencing. It is important that any future strategy identifies how funding can be secured for these types of interventions, as funding was ended in the Comprehensive Spending Review.

¹ Briefing on the risks of toll road investment in the UK, Campaign for Better Transport, November 2011, <http://www.bettertransport.org.uk/system/files/toll-road-investment-briefing.pdf>

The report does look at how Local Enterprise Partnerships and local authorities might be involved in developing these strategies, but we recommend that the scope of the studies themselves is widened, and that a much greater focus is placed on the interplay between local transport needs and the effect on the strategic network.

Campaign for Better Transport's recent response to the A14 Challenge is an example of how our suggested approach might work.² Corridor planning was at the heart of these proposals and many of the suggested first wave of solutions to congestion on the A14 in Cambridgeshire were focused on short journeys in and around nearby urban centres, rather than on changes to the road itself. The proposal was also able to look at the effect of wider policies outside the study area, such as signalling improvements at Leicester to increase the capacity for rail freight to be used within the A14 corridor.

We highly recommend embedding a similar corridor-planning approach in the way the Highways Agency works, as well as making sure that local policy-makers are closely involved in creating new strategies.

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² Response to the 'A14 Challenge' – Campaign for Better Transport
http://www.bettertransport.org.uk/files/A14_response_CBT_final.pdf