



Department  
for Transport

## Shaping the future of England's strategic roads (RIS2)

### Personal details

1. Are you responding as: \*

an individual? (Go to question 4 below)

**X** on behalf of an organisation?

### Organisational details

2. Your organisation's name?

Campaign for Better Transport

### 3. What category best represents your organisation?

Representative group

Transport provider

Highways England supplier

National public sector body

Local public sector body

Local or combined authority

Local Enterprise Partnership

Business

**X** **Charity**

Other organisation:

### Initial report proposals

4. Do you think Highways England's proposals will deliver what users of the SRN want? \*

Yes

**X** **No**

Don't know

### Different way

5. If you answered no, what could be done differently?

The priority for road users, as reported by Transport Focus, is maintenance, safety and reliability.

A continued focus RIS2 on new road capacity will take resource away from maintenance and will only serve to generate more traffic, leading to more congestion and less reliability in future. Expanding the network will also increase the long term maintenance costs, further exacerbating the current situation. This is the opposite of what road users want.

Network resilience requires future-proofing against climate change, both through resilient design and by proactively reducing CO2 emissions. The most recent statistics on UK emissions (2016 figures, published by BEIS in February 2018) confirm that transport is the largest sector for greenhouse gas pollution. The UK Committee on Climate Change requires a 5% reduction in vehicle kms to achieve CO2 targets: the Strategic Road Network Initial Report (SRN IR) wholly fails to address this.

A package of good maintenance, sustainable design, better integration with other modes, and demand management would help deliver a responsible low carbon future and a range of other Government priority areas such as health and social mobility. The SRN IR misses the opportunity to show leadership on these crucial agendas.

The SRN IR acknowledges the importance of “meeting the needs of bus and coach operators and their passengers” yet proposes no measures that would achieve this. RIS2 should seek to ‘bus-proof’ the SRN with bus priority measures for services both using the SRN and crossing it and better infrastructure including bus stops and passenger crossing points to access the bus services. Expressway design should be developed in partnership with bus and coach operators and local authorities to ensure that current and future needs of bus users are met.

The priorities for non-motorised users are safe and easy access to and across the network. The SRN IR is largely silent on this, and the expressway model risks increasing the exclusion of cyclists, pedestrians and bus passengers from the network.

There are some areas to welcome, including proposals for more funding for local safety schemes, better rest areas and measures to reduce light pollution.

However overall the priorities set out in the SRN IR need changing towards sustainable transport and development and away from enlarging the strategic road network. Virtually no road journeys are made solely on the SRN: adding new capacity to the SRN will do little or nothing to improve every day end-to-end journeys, and, by encouraging more traffic onto the local road network, is likely to make congestion worse.

RIS2 could and should do more to focus on making the existing network better, rather than speculative building of new roads which go against both the trends of falling car ownership, and the environmental imperative to reduce vehicle miles. It also goes against the evidence that shows that congestion is likely to get worse as a result of more road building and as such risks wasting vast amounts of public money.

### Initial report proposals

**6. Do you think Highways England's proposals will deliver what businesses want? \***

Yes

**X No**

Don't know

**Different way**

**7. If you answered no, what could be done differently?**

Squandering funds on new roads that will soon fill up with new traffic is a poor investment for businesses' future. Businesses are particularly adversely affected by congestion and poor road maintenance, causing delay and disruption to their schedules. RIS2 should focus on maintenance ahead of capacity, combined with better integration with public transport to support efficient commuter and customer travel, as this would be best for improving reliable access for business.

Electrification of the fleet is a far more significant trend than moves to autonomous vehicles. As set out in our RIS2 submission, HE could and should show leadership in accelerating the rollout of fast charging points for SRN users in addition to electrification of the HE operation fleet. This will give businesses the confidence to deliver the greener fleet vision that underpins the UK Clean Growth Strategy and is a vital strand in achieving the country's CO2 emission targets.

With moves to distance-based charging for HGVs, and increasing controls on safety design and emissions from HGVs entering cities, businesses will be looking for consistency and certainty on future road user charging. RIS2 should give a clearer steer that this is an emerging policy for which the SRN will be technically prepared.

**Initial report proposals**

**8. Do you think Highways England's proposals meet the needs of people affected by the presence of the Strategic Road Network? \***

Yes

**X No**

Don't know

**Different way**

### 9. If you answered no, what could be done differently?

The SRN has a major impact on physical and mental health of the communities living on and around it. These impacts include but are not limited to:

- Severance – cutting through communities and disrupting ‘desire line’ crossing routes
- Noise pollution – both direct health impacts and wider impacts on tranquillity
- Air pollution – this is already at illegal levels and HE work to date has had little impact
- Visual impact – including damage to protected landscapes and ancient woodlands
- Increasing traffic levels and congestion off the SRN

To address these impacts, the RIS needs to refocus on environmental retrofit and away from new road capacity, as set out in our report ‘Rising to the Challenge’. The aspiration in the SRN IR “to run a network which works harmoniously with its surroundings to deliver an overall positive impact on the environment” is welcome, but needs to be backed by more specific policies and, crucially, a move away from such potentially damaging new road capacity.

For example, we look in vain in the SRN IR for a comprehensive low noise resurfacing programme, a commitment to employ sustainable drainage systems (SUDS) or other forms of green infrastructure, despite the multiple benefits such approaches can deliver.

We are concerned about proposals for new orbital routes, widespread road widening, and new motorway-standard expressways, which will inevitably increase the overall adverse impact of the SRN, as set out in our responses to q10 below.

### Initial report proposals

#### 10. Do you agree with Highways England's proposals for:

	Yes	No [ <i>not entirely</i> ]
the four categories of road and the development of Expressways (initial report sections 4.4.3 and 5.3.6)	<input type="checkbox"/>	X
the operational priorities (initial report section 5.1)	<input type="checkbox"/>	X
the infrastructure priorities (initial report section 5.2)	<input type="checkbox"/>	X
the investment priorities (initial report section 5.3)	<input type="checkbox"/>	X
a local priorities fund (initial report section 5.3.8)	<input type="checkbox"/>	X
the future studies (initial report section 5.3.11)	<input type="checkbox"/>	X
the designated funds (initial report section 5.4)	<input type="checkbox"/>	X

Yes

No [*not entirely*]

the performance  
measures and targets  
(initial report section 6.3)

X

If you said no to any, what could be done differently (referencing the topic)?

We would have preferred a “Partially” option, rather than a blanket Yes or No given the range of proposals under each heading, some but not all of which we can support.

#### **Four categories of road 4.4.3**

We are not persuaded that the differentiation of smart motorways from other motorways or expressways, and expressways from all-purpose trunk roads is of itself particularly helpful. The key point is how such roads are managed and what the priorities are within the RIS, not the designation of individual roads.

The RIS should provide more clarity over which routes are planned to become expressways, how these will differ from motorways and which routes will remain as all-purpose trunk roads.

It is important that non-smart motorways, and non-expressway trunk roads, do not become ‘poor relations’ and that they continue to receive a fair share of funding for maintenance, safety, local integration and environmental enhancements.

#### **Operational priorities 5.1**

It is a serious omission that cutting CO2, improving air quality and other environmental improvements are not seen as operational priorities for the SRN. All infrastructure programmes must play their part in actively meeting critical environmental targets, not simply acknowledging them as a constraint. If not addressed in the RIS, this will be a significant policy failure.

We support making better maintenance and safety, better use of information, local integration and provision for electric vehicles as priorities for RIS2. Better roadworks and good customer service are also sensible priorities. We are less persuaded by prioritising work on connected and autonomous vehicles.

#### **Infrastructure priorities 5.2**

We welcome the emphasis on maintenance: following a construction-heavy RIS1, and an ageing network, the priority of RIS2 should be on consolidation, maintenance and retrofit.

We would like to see the environmental approaches set out in our report ‘Rising to the Challenge’ reflected here, including a commitment to low-noise resurfacing, sustainable drainage systems and wider use of green infrastructure, which have benefits for both enhancement and resilience.

We note the comment that “With limited funding, we need to make difficult decisions about how we prioritise between extending the life of some of our oldest and busiest roads, and building new roads to ease congestion”: as new roads have only a temporary impact on congestion, and noting the priority given by road users to maintenance, we believe the case is already made for a fix it first approach.

#### **Investment priorities 5.3**

### **Strategic Studies 5.3.2**

We have contributed our views on the six RIS1 strategic studies, including the strategic study on the M25 SW Quadrant which rejected further widening. We are sceptical about the need for costly new roads, particularly the Trans Pennine Tunnel and the Oxford-Cambridge Expressway, believing that the connectivity needs of both these routes would be better served by rail.

### **Other studies 5.3.3**

The North of England Wider Transport Connectivity Study has exposed the weakness of the argument that a Trans Pennine Road Tunnel would improve connectivity, as it would require numerous junction upgrades to manage the multiple negative impacts on the wider road network.

We agree with the SRN IR comment that the Midlands Motorway Hub study should take a cross-modal approach rather than pursue new road building. In particular, any plans for a western motorway bypass should be quashed: this approach has been rightly rejected over the years given the severe environmental constraints on any potential route.

### **Future RIS schemes 5.3.4**

We note the 15 locations identified, ranging from schemes already in consultation (e.g. Lower Thames Crossing) and others at an exploratory stage (e.g. A417 'missing link') and will comment on individual schemes as they arise. However, our basic position remains that new road capacity should be a last resort; that national parks, ancient woodlands and other designated sites should always be protected, with maintenance, safety measures, demand management and integration with other modes, taking priority.

### **Smart motorways 5.3.5**

The original concept of smart motorways, making full use of new technology to manage speeds and capacity and maximise safety, is one we support and one we would like to see potentially used on all motorways. We are keen to see RIS2 explore ways to minimise the visual intrusion of smart technology while extending its coverage and its integration with local transport systems.

However, we are not persuaded that the current deployment of 'all lane running' is the right solution and share widespread concerns raised over operational safety and user satisfaction.

### **Expressways 5.3.6**

We are concerned that expressways as set out in the SRN IR may be a retrograde step. The SRN IR says that "The major development will be the presence of the expressway network across the length and breadth of the country."

If the focus of expressways is on enhancing provision for non-motorised users and reducing severance, while also improving safety and flow for motorists, we acknowledge that could lead to improvements. In particular, we have welcomed the potential to deliver a comprehensive cycling SRN, designed to the latest IAN standard (195/16).

However, the vision for expressways in the SRN IR is to deliver "a motorway-like experience", which would increase the adverse environmental impact on surrounding communities without any local transport benefit.

The four-stage approach could be used to specify the appropriate end stage for each road, recognising that for many parts of the SRN, a motorway-style route is wholly inappropriate. However the SRN IR suggests that all routes designated as expressways would eventually complete stage 4 and become a motorway.

We reject any programme of motorways by stealth and urge this area of the SRN IR to be given a serious rethink. As a minimum, there should be consultation on the principle of a given route becoming an expressway in advance of any consultation on specific measures.

### **Local priorities fund 5.3.8**

We support more funding for local schemes and agree with the SRN IR that that “smaller schemes can offer high value for money and benefit local areas”. However, we would want RIS2 to ensure that schemes were required to contribute positively to environmental objectives and include high quality provision for non-motorised users, not simply additional road capacity.

We note the success of the Local Sustainable Transport Fund, which was successful in achieving its objectives, particularly in relation to the local economy, carbon emissions, wider social and economic benefits, and physical activity, and demonstrated excellent value for money. The remit of the RIS2 local priorities fund should be extended to include such measures.

### **Future studies 5.3.11**

**Free-flow junctions:** studies for free-flow junctions should be prioritised on safety grounds, and must be designed to ensure high quality alternative provision for other modes. Where addressing congestion is the priority, then speed controls and demand reduction measures should be considered ahead of additional capacity.

**Last mile improvements:** if linked to integration hubs, we would support this approach. The SRN should complement not undermine local transport strategies by designating key routes, designing these to minimise adverse environmental impact, and seeking to reduce overall traffic levels.

**Integration hubs:** we strongly support an integrated approach, including maximising use of interventions such as park & ride bus and rail routes, multi-modal freight interchanges, and local consolidation centres.

**Key route upgrades:** we are concerned about a continued emphasis on new capacity despite the evidence that this is not a sustainable investment. However, as a minimum we would expect RIS2 to protect National Parks, ancient woodlands and other nationally important landscapes and wildlife sites from new road building or major widening.

The SRN IR identifies three potential studies: upgrading “the entire A1 in England” to be a motorway, further upgrading of the M60 South East quadrant, and potentially adding capacity to the M6 corridor between Manchester and Birmingham. Each of these raises concerns, for example, impacts respectively on the Great Ouse, Stretford Meadows and the Cannock Chase AONB. The RIS1 strategic study on the M25 SW Quadrant rightly rejected further widening: we urge caution on assuming that widening of key routes would be an effective use of resources in RIS2.

**Orbitals:** We support the aims in section 5.3.11 of the SRN IR “to provide better end to end journeys, relieve congestion in cities, to reflect increased urbanisation and to provide improved integration with public transport” but strongly reject the flawed idea that these

goals could be delivered by building new orbital motorways or trunk roads. Such roads would be likely to result in additional traffic, more congestion and no benefit to public transport.

Better options would be to work with bus and coach operators to improve the performance of the SRN for these users, and to oppose ribbon development along the SRN which undermines the urbanisation agenda. Both of these important areas are unaddressed in the SRN IR.

#### **Designated funds 5.4**

We called for the creation of designated funds in RIS1 and strongly support their retention in RIS2 with as a minimum, an increase pro rata with the overall RIS2 funding allocation. We look to Highways England to maintain the commitment that the designated funds will not be used for 'business as usual' and to mainstream the lessons, evidence and best practice accrued through these funds to date.

We note the proposal to merge funding for air quality with environment in a new 'wellbeing' fund. We welcome the potential for greater co-ordination of projects and a streamlined funding process: however, this must not be at the cost of reduced funding for each strand. In particular, air quality remains an area for urgent action. RIS2 should include an earmarked budget to deliver the Air Quality strategy. Highways England should be empowered to use designated funds to contribute to the delivery of Clean Air Zones in partnership with local authorities affected by the SRN.

We welcome the retention of dedicated funding for walking, cycling and integration in the proposed 'connecting communities' fund for additional, retrospective enhancement for the network. The integration strand should be retained and expanded in RIS2 with an additional specific allocation to support bus and coach integration on the SRN. The level of funding should be increased pro rata with the overall increase in the RIS2 budget.

Where new road schemes are being delivered, high quality provision for cyclists and other non-motorised users should be an integral part of the scheme budget and not rely on the designated funds for delivery. In particular, the proposals for expressways could see a range of users excluded from the network. It is vital that should this happen, that high quality alternative provision is funded as part of the expressway plans and not from designated funds.

We welcome additional designated funding for roadside facilities, noting that these have an impact on the environmental quality of the network as well as the user experience.

We welcome the suggestion that environmental groups and other NGOs could be engaged as partners in proposing and delivering schemes supported by designated funds in RIS2.

#### **Performance measures 6.3**

We note the proposals in the SRN IR for "a performance framework that measures the things that are important to customers and our shareholders": it is also important to measure impacts on the wider community and our shared environment.

It is also important that any metrics measure outcomes rather than activity. Our report *Rising to the Challenge* makes detailed suggestions for meaningful performance metrics, and we look forward to continuing to engage with DfT, ORR and HE in developing performance measures for RIS2.

11. Are there any other proposals that you do not agree with? \*



Yes

No

### Disagreed proposals

#### 12. State the proposals you disagree with and what could be done differently?

Our concerns extend beyond specific proposals to wide areas of omission.

While we are grateful for the acknowledgement of our work in developing thinking on environmental priorities for RIS2 in our joint report 'Rising to the Challenge' we must emphasise that we set these priorities for the whole RIS, not only for the designated funds.

While environmental mitigation and retrofit to undo the harm caused by past road building is necessary, it is not sufficient: we are advocating a sustainable approach for the whole RIS, and this is still not evident from the SRN IR. We look forward to the DfT undertaking a Strategic Environmental Assessment (SEA) of the RIS including its impact on climate, public health and the natural environment.

In considering future schemes, RIS2 should as a minimum confirm a presumption against any new road construction in protected landscapes, ancient woodlands, designated wildlife sites and World Heritage Sites.

In addition to the other issues raised in this response, we note 5.3.9 "working closely with Heathrow and the Department for Transport to support the government's preferred option of the development of a third runway." We are concerned about proposals to expand Heathrow, including the adverse impacts on the SRN and the rest of the surface transport network. Instead of supporting this expansion, the SRN IR should be open on the risks this poses to a sustainable network.

We welcomed the suggestion from Transport Focus that RIS2 should give responsibility for litter clearance, junctions and slip roads on all SRN roads to Highways England. This is missing from the SRN IR.

### Future needs

13. Do you agree with Highways England's assessment of the future needs of the strategic road network? (See Initial Report section 4.4.) \*

Yes

No

Don't know

### Future needs alteration

14. If you answered no, how would you change the assessment?

The single greatest future need is to meet CO2 reduction targets to avoid catastrophic climate change impacts. The UK CCC sets targets for traffic reduction as part of the minimum changes needed to meet CO2 budgets that are already off track. The SRN IR does nothing to address this.

RIS2 should be an opportunity to show leadership and proactively support sustainable development and the Government's Clean Growth strategy, by focusing on a safe, well-maintained, and fully-integrated transport network.

The sections on economic growth (4.2.3) and future trends (4.4) continue to overstate the economic benefits of new roads, and the demand for future greater road capacity. Repeated studies, based on POPE reports, show that the economic benefits of new roads are at best over-stated and worst exacerbate congestion and journey time unreliability on the road network as a whole.

Traditional transport appraisal has consistently underestimated the economic benefits of bus services, walking and cycling provision and overstated the value of small scale savings in road travel time. This has led to an imbalance in favour of unsustainable investment in road capacity which appears to be perpetuated in the SRN IR.

While welcoming the use of different future scenarios in developing the SRN IR, we are deeply concerned about the validity of its conclusions and in particular that greater use of buses and public transport is seen only as part of a 'diminished prosperity' scenario (in 'Connecting the Country: Planning for the long term'). This is both offensive and misguided. Modern buses are an integral part of vibrant, prosperous cities that achieve sustainable growth while managing congestion.

We welcome the potential for smart technology to improve integration with local transport systems for smarter traffic management and journey planning. We look to the RIS to move the focus of new technology from vehicles to data, with less focus on autonomous vehicles and more on the wider connectivity benefits of information and communications technology, including reducing the need to travel.

Despite acknowledging critical trends such as the growth in online commerce, remote and flexible working, and falling car ownership, the SRN IR still concludes that growing road capacity is both inevitable and desirable. This is setting the RIS on a course for waste and failure.

## **Aims**

**Our 5 aims, central to how we aspire to measure success in Road Period 2 (2020 to 2025), are:**

**economy**, providing investment that yields increased productivity and economic output

**network capability**, we need a network that can meet future demands on it and support growth for the long term

**safety**, England has some of the safest roads in the world and the SRN is the safest part of all, per mile driven, however this is no cause for complacency and we remain committed to reducing deaths and injuries on our nation's roads

**integration**, very few journeys start or end on the SRN, almost all will use other transport networks, we will therefore seek new opportunities for linking the SRN with local roads, major roads and other modes of transport

**environment**, it is vital that we continue to drive the transition to a decarbonised network that is environmentally and locally sensitive, we will continue to tackle the negative external impacts of the SRN, and aim for RIS2 to make a positive contribution to the environment and air quality

**15. How far does the initial report meet the government’s aims of:**

	1 - doesn't meet aim at all	2	3	4	5	6	7 - completely meets aim
economy?	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
network capability?	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
safety?	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
integration?	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
environment?	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Which aims could Highways England do more to meet and how?

Economy – prioritise a well-maintained network that plays its part in a fully integrated, multi-modal network. Invest in non-road measures, such as public transport, that reduce traffic levels and pressures on the SRN

Network capability – prioritise safety and information ahead of new capacity, work with travel generators to develop and implement travel plans and demand management measures.

Safety – reverse the rollout of All Lane Running, reduce speeds, improve safe provision for vulnerable users

Integration – give bus and coach services and passengers long overdue attention, improve integration with multi-modal interchanges for both passengers and freight

Environment – set targets for CO2 reductions for the RIS as a whole, and CO2 caps for individual schemes, including a ‘carbon cap’ where traffic growth would breach UK CCC targets. Make better use of green infrastructure throughout the RIS. Partners with local authorities to deliver air quality targets.

### Other questions

16. Do you think there should be any change in the roads included in the SRN? (See consultation document, section 1.3) \*

Yes

No

**Don't know**

### Roads

17. Which roads would you propose are added to or removed from the SRN, and why?

The key point is how such roads are managed and what the priorities are within the RIS, not the designation of individual roads. The SRN should be planned and managed as part of an integrated, multi-modal transport network, rather than in isolation.

Inclusion in the SRN should not necessarily mean increasing capacity but should ensure standards of safety, maintenance and high quality design, including environmental retrofit, recognising the adverse impact that major roads have on the environment.

Given its location close to the South Downs National Park, the failure of the Chichester bypass plans and controversy over plans for the Arundel section, and the alternative options to deliver transport capacity through public transport improvements, there is a case for removing the A27 from the SRN and treating it as part of the MRN instead.

### Other questions

18. Is there anything else we need to consider when making decisions about investment in the network? \*

**Yes**

No

Don't know

### Other factors

19. What other factors do you want considered?

The SRN IR is limited from the start by taking a mono-modal approach. The RIS should be part of a truly integrated transport strategy that seeks to deliver 'good growth' by following the smarter travel hierarchy: reduce demand, widen travel choice, maximise efficiency, and make new road capacity a last resort.

RIS2 should adopt an integrated approach to option appraisal on congested corridors, rather than consider road schemes in isolation, and have an explicit remit to improve integration with public transport as part of a multi modal approach. For example, to support better use of

the SRN, the DfT should consider allowing reallocation of funds within the Road Investment Strategy to reinvest in increased rail freight capacity and enhanced bus and rail passenger interchanges and parallel corridors. This is a legitimate use of RIS funding, given the significant potential of rail freight to replace multiple HGV loads, thereby improving the capacity of the SRN and reducing the adverse impacts, including maintenance costs, of HGV traffic.

RIS2 should contribute to wider sustainable development goals that support reduced car dependence and appraise road schemes on that basis. Future investment should focus on establishing a safe and well-maintained network, with budget allocations to match this priority.

Such an approach would naturally come out of a Strategic Environmental Assessment (SEA). The failure to carry out such a process is one reason RIS2 risks having multiple negative impacts while missing the opportunity to help the Government deliver on many other policy priorities. We urge that an SEA is carried out as a matter of urgency to help steer this major transport investment programme onto a more sustainable trajectory.

### **Analysis balance**

20. Does the analytical approach taken have the right balance between ambition, robustness, and proportionality? (See chapter 6 of consultation document) \*

Yes

No

X **Don't know**

### **Different balance**

21. What do you suggest we do differently?

### **Final comments**

22. Any other comments?

The priorities for the SRN should be maintenance, including safety measures; integration, with a truly multi-modal approach; and environmental leadership, including a serious commitment to CO2 reduction and demand management, with new road capacity a last resort.