DfT consultation on National Highways Initial Report
July 2023

Q5. What importance, if any, would you give to the following strategic objectives:

- Improving safety for all (very important/important/neither important or unimportant/unimportant/very unimportant)
- Improved environmental outcomes (very important/important/neither important or unimportant/unimportant/very unimportant)
- Network performance to meet customer needs (very important/important/neither important or unimportant/unimportant/very unimportant)
- Growing the economy (very important/important/neither important or unimportant/unimportant/very unimportant)
- Managing and planning the SRN for the future (very important/important/neither important or unimportant/unimportant/very unimportant)
- A technology-enabled network (very important/important/neither important or unimportant/unimportant/very unimportant)

The Department for Transport and National Highways should make improved environmental outcomes their most important objective for RIS3, and should specifically focus on decarbonising road transport.

In contrast to other objectives, National Highways has had much less success in this area, with surface transport still accounting for nearly one quarter of UK emissions. A short-term emphasis on decarbonising operations and reliance on the proliferation of electric vehicles in the longer term is insufficient. As the Climate Change Committee wrote in their recent report to Parliament, "A pathway that is almost exclusively technology dependent is likely to be less cost effective, entails higher delivery risk … and risks missing out on opportunities to realise co-benefits to society. (p. 108)"

In particular, increasing Strategic Road Network capacity is incompatible with the Government's net zero targets, as laid out by Transport for Quality of Life (TQL). TQL's analysis suggests that the current (i.e. second) Roads Investment Strategy (RIS2) is inconsistent with the UK's carbon targets, whereas the Department for Transport's (DfT's) analysis underplays RIS2's carbon impacts in ways that are potentially misleading. They also point out that none of the scenarios presented in DfT's 2022 National Road Traffic Projections are consistent with the Committee on Climate Change's pathway for reducing CO_2 from surface transport, or with DfT's own Transport Decarbonisation Plan (TDP). Transport investment should seek to reduce car-dependence, not entrench it further.

Improved safety for all is another important objective. To meet its promise of supporting active travel, National Highways must prioritise solutions to severance issues. Severance occurs when the presence of the SRN or junctions associated with it prevents people from

cycling safely and conveniently – e.g. from homes on one side of a trunk road to schools on the other side.

Additionally, National Highways should itself drive the market for safe 'direct vision' lorries by committing to procure these for all NH construction work. Direct vision lorries reduce collisions with pedestrians and cyclists, both on and off the SRN.

Technology can be valuable for prioritising which improvements are needed, including improved provision for Non-Motorised Users (NMUs). We support NH's proposal to collaborate with Cycling UK and Active Travel England on this. We recommend that NH should use the Propensity to Cycle Tool to prioritise the locations with the greatest need for active travel improvements.

One technological innovation that may present a particularly useful opportunity for increased safety on the SRN – as well as air quality and economic vitality elsewhere – is autonomous lorries. Autonomous vehicles will likely be safe to operate on the SRN much sooner than on local roads. The use of autonomous lorries on the SRN could potentially yield significant cost-savings for businesses (and hence wider economic benefits), as well as improving road safety, both on the SRN itself and on the local road network. However, achieving safety benefits on urban streets will require the setting up of trans-shipment depots outside urban areas, where the cargo from larger autonomous (and indeed non-autonomous) lorries can be transferred on to sustainable urban delivery vehicles, including cargo bikes, allowing freight to reach destinations safely on urban streets that are shared with cycle and pedestrian traffic. We believe NH should be tasked with facilitating such arrangements.

As for the economic objective, we do not believe this should be a significant factor for RIS3. For one thing, the research literature on the relationship between transport and the economy presents a consistent message of uncertainty over whether roads investment does in fact have an overall economic benefit, or whether other forms of transport investment would achieve greater economic benefits with fewer disbenefits.

The relevant literature includes:

- The seminal report by the Standing Advisory Committee on Trunk Road Assessment (1999)
- DTZ Pieda Consulting for the Welsh Government (2004)
- Frontier Economics for the UK Department for Transport (2017)
- Dr Steve Melia (University of the West of England, 2018)
- The Centre for Cities (2020)
- The What Works Centre for Local Economic Growth (2015)

In summary, these and similar studies typically find that roads investment can have short-term localised benefits in terms of (a) reducing local congestion, and hence reduced transport costs faced by businesses in locations which benefit from this; (b) access to a wider labour market, and (c) opening up sites for economic development. However it is far

from clear that road schemes (particularly longer-distance road schemes) are the best way to achieve overall economic benefits; it may well be that they simply move economic activity to different locations. Moreover, some of these studies indicate that improving public transport and other alternatives to private vehicles within and around urban areas could have greater overall benefits.

There is also evidence (summarised by CPRE and in a recent briefing by Phil Goodwin and Lisa Hopkinson) that road schemes generate additional road traffic, thereby increasing the overall economic costs of congestion, pollution and other adverse impacts. These impacts are very substantial:

- Congestion is estimated to cost the UK economy £30 billion per year.
- Air pollution is estimated to hasten between 28,000 and 36,000 deaths annually in the UK, at an economic cost of £20 billion or more.
- Collisions were estimated to cost the country £30 billion in 2021.
- Physical inactivity leads to ill health, costing the UK around £7.4 billion annually.

Melia (2018) notes that "current [road-building] policies are effectively trading the certainty of environmental damage for the hope of a small increase in economic growth. The analysis in this paper suggests that hope may be illusory."

Transport planners and academics have consistently warned against the simplistic assumption that roads investment has economic benefits. In 2022, the Transport Planning Society called for all road schemes in the 2nd Roads Investment Strategy (RIS2) to be reviewed. The Roads Scrutiny Panel, including eight transport professors, issued a similar call in early 2023.

In any case, DfT-commissioned research found that the benefit to cost ratio of investments in active travel is 5.62:1, in comparison to 2.0:1 for the major schemes in RIS2.

We therefore contend that rebalancing transport investment to favour active travel and sustainable transport is likely to yield greater economic benefits, as well as being far more beneficial (and a lot less damaging) in terms of environmental, safety, health and wider societal impacts.

Q6. What, if any, other specific roads do you think we should consider as:

- Trunking candidates?
- De-trunking candidates?

N/A

Q7. Do you think National Highways has identified the right focus areas?

- How much its customers will travel (Yes / No / Don't know)
- How its customers will experience travel (Yes / No / Don't know)
- How it will manage its network (Yes / No / Don't know)

We suggest that the decarbonisation focus area has much more relevance to the question of "How much our customers will travel" than it does to "How our customers will experience travel".

While it is clearly important to consider future travel behaviours, NH incorrectly describes its approach as "decide and provide". Decide and provide would mean selecting a desired outcome and planning accordingly. Instead, NH has assumed (or "predicted") that demand for car travel will continue to increase, and is for the most part planning to accommodate that increase.

Research has shown that road traffic must decline by at least 20% by 2030 to meet the government's net zero objective. We also know that demand for vehicle travel is driven by the ease and cost of driving relative to alternatives. Therefore, government funding must prioritise the improvement of public transport and active travel.

Whilst the Digital focus area rightly highlights overlaps with automation of freight, the 'Freight and logistics' focus area needs to reflect this. It should refer to providing for autonomous lorries on the SRN, backed up by trans-shipment depots on the edges of towns and cities, where HGV loads can be transferred onto safe urban delivery vehicles including cargo bikes for onward delivery (see answer to Question 5).

The 'Safety' focus area needs to highlight action to improve safety for those walking or cycling along or across the SRN corridors, in order to contribute to other wider objectives such as decarbonisation, health, air quality, and local economic vitality. For more on safety, see our response to Q9.

Q8. To what extent do you agree with National Highways' approach to improving safety on its network?
(Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know)

Q9 [If applicable] Why do you disagree?

National Highways does not devote sufficient attention to the safety of Non-Motorised Users (NMUs). Cyclists and walkers are put particularly at risk by poorly designed junctures between the SRN and local roads or active travel networks. Moreover, increased traffic levels on the SRN (which is accepted and accommodated within NH' planning for the future) will correspond with increased traffic elsewhere. This presents a risk for pedestrians and cyclists, who are much more likely to be killed than to cause the deaths of other road users.

NH does aim to address NMU safety issues through its Designated Funds (DF) programme, but the allocated proportion must be much larger to make a difference. Although NH tells us that it delivered 160 new and upgraded cycle ways during the period of RIS1, it has presented no evidence of whether these increased cycle use or improved cycle safety.

This is in part because NH has failed to put in place arrangements to monitor the impact of either the DF programme or its wider activities on cycle (and indeed pedestrian and equestrian) travel along and across the SRN, and the safety of these journeys. We urge that all future NH schemes (whatever their purpose and however they are funded) should include 'before and after' monitoring of cycling and other NMU activity, as well as casualty rates. Casualty rates should be relative to overall cycling (or pedestrian or equestrian) rates, to avoid creating a perverse incentive to reduce cycle use as a way of reducing cyclist casualties.

Finally, as a major employer within the construction sector, NH has the opportunity to drive an increase in the uptake of direct vision lorries. HGVs are involved in a disproportionately high percentage of cyclist and pedestrian deaths. By shrinking blind spots, direct vision lorries significantly decrease this risk. NH should commit to procure direct vision lorries for all of its construction work.

Q10. To what extent do you agree with National Highways' priorities for making the best use of the existing Strategic Road Network?
(Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know)

Q11 [If applicable] Why do you disagree?

We agree with the prioritisation of existing road asset maintenance over construction of new roads. However, DfT must allocate a greater proportion of its funding to the maintenance of local roads and active travel networks. The Government has rightly aimed for half of all short urban journeys to be walked or cycled by 2030, and yet recently slashed its funding for active travel infrastructure by 75%. Meanwhile, active travel rates remain stubbornly low: in England, cycling still accounts for just 2% of all journeys. The Government cannot meet its net zero objectives whilst continuing to prioritise private vehicle travel over sustainable forms of transport (see also answer to Q 14).

Q12. To what extent do you agree that National Highways should evolve its:

- **Customer offer**
- **Community offer**
- **Proposals for designated funds**

(Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know)

[If applicable] Why do you disagree?

We agree on sharing data and preparing for autonomous vehicles (see also answer to Q 5).

We also strongly agree on integration with local roads and other transport modes and welcome the proposal to assess what NMU provision is needed. This should involve assessing the cost of NH's contribution to fulfilling DfT's ambition to "deliver a world class cycling and walking network by 2040" (see Transport Decarbonisation Plan). For this and other reasons, the Designated Funds (DF) need to be a much greater proportion of overall RIS3 budget (currently only about 4%).

Regarding freight, we agree on expanding NH's role in developing freight facilities. This should be coupled with its work on preparing the SRN for autonomous vehicles (AVs), and specifically for autonomous lorries – given that AVs are likely to be useable on motorways and trunk roads a long time before they are deemed fit for use on urban streets and rural single-carriageways (where they must share space with NMUs). Hence there is a need for trans-shipment depots outside urban areas, where large HGV loads can be transferred onto smaller urban delivery vehicles, including cargo-bikes.

NH should also drive demand for safe 'direct vision' lorries by committing to use these for all its construction work (see also answer to Q9). HGVs are involved in a disproportionately high number of cyclist and pedestrian fatalities. Direct vision lorries significantly decrease this risk by reducing the area for which drivers must look at their mirrors, enabling them to see directly whether a pedestrian or cyclist is in danger. NH should commit to procure direct vision lorries for all of its construction work.

Finally, we broadly support the priorities for Designated Funds. However:

- The DF should be a much larger proportion of the overall RIS3 budget
- Under the safety fund, we seek assurance that there will be an assumption of provision for all NMUs, for example by replacing the reference to "footbridges and footpaths" with "bridges and other facilities for active travel".
- Whilst the four proposed DF will doubtless have distinct objectives, the DF process should seek to prioritise projects which achieve multiple objectives, such as flood defences with walking and cycling provision along them.
- NH needs to drastically improve its monitoring of the performance of the DFs against agreed outcome objectives. At present, NH can tell us how many active schemes it has delivered but not whether these have increased movement on foot or by cycle along or across the SRN, or improved the safety of these activities.

Q13. To what extent do you agree with National Highways' approach for driving decarbonisation and environmental sustainability on the SRN?
(Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know)

Q14 [If applicable] Why do you disagree?

A short-term emphasis on decarbonising operations and reliance on the proliferation of electric vehicles in the longer term is insufficient. As the Climate Change Committee wrote in their recent report to Parliament, "A pathway that is almost exclusively technology dependent is likely to be less cost effective, entails higher delivery risk … and risks missing out on opportunities to realise co-benefits to society. (p. 108)"

In particular, increasing Strategic Road Network capacity is incompatible with the Government's net zero targets, as laid out by Transport for Quality of Life (TQL). TQL's analysis suggests that the current (i.e. second) Roads Investment Strategy (RIS2) is inconsistent with the UK's carbon targets, whereas the Department for Transport's (DfT's) analysis underplays RIS2's carbon impacts in ways that are potentially misleading. TQL also points out that none of the scenarios presented in DfT's 2022 National Road Traffic Projections are consistent with the Committee on Climate Change's pathway for reducing CO_2 from surface transport, or with DfT's own Transport Decarbonisation Plan (TDP). The evidence is clear: making driving easier or quicker leads to more driving, which – particularly in the absence of widespread EV adoption – will mean ever more emissions. Transport investment should seek to reduce car-dependence, not entrench it further.

Q15. To what extent, do you agree with National Highways' approach for its future enhancements programme?
(Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know)

Q16 [If applicable] Why do you disagree?

Even a 'targeted' programme of future enhancements is incompatible with 'net zero'. The Climate Change Committee has recently called for a review of all road schemes (similar to that undertaken by the Welsh Government) to assess whether they are compatible with net zero and other objectives. Making driving easier and quicker generates more traffic, thus locking in car dependence (see answer to Q 14).

Q17. To what extent do you agree with the insights in the SRNIR on the most important performance outcomes to measure?
(Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know)

Q18 [If applicable] Why do you disagree?

Although we welcome the proposal to explore a cycling and walking indicator based on "understanding the views of our cyclists and walkers", this is no substitute for developing the capacity to monitor levels of walking and cycling activity along and across SRN corridors (this would be one Performance Indicator), and hence to be able to assess the safety of these movements (a second PI, which would comprise the usage indicators divided by an indicator for the numbers of pedestrian and cyclist injuries arising from travel along and across SRN corridors).

NH's contribution to the Government's 2nd Cycling and Walking Investment Strategy (CWIS2) amounts to £90m. Yet we know virtually nothing about whether this is delivering value for money – a failing recently criticised in the NAOs recent report on Active Travel in England. This needs to be addressed, particularly if (as Cycling UK hopes) the DF programme is to be substantially increased in RIS3.

Q19. What, in your view, could be done differently to meet the needs of people affected by the:

- presence of the SRN?
- operation of the SRN?

To meet its promise of supporting active travel, National Highways must prioritise solutions to severance issues. Severance occurs when the presence of the SRN or junctions associated with it prevents people from cycling safely and conveniently – e.g. from homes on one side of a trunk road to schools on the other side. RIS3 needs to include a major programme to improve provision for people to cross the SRN on foot, cycle or horseback – whether through separate grade-separated crossings or improved crossing facilities at junctions. These should be linked to local authorities' Local Cycling and Walking Infrastructure Plans (LCWIPs) and Rights of Way Improvement Plans (RoWIPs). The scale of this programme needs to be sufficient to contribute to the fulfilment of the Government's aspiration to "deliver a world class cycling and walking network for England by 2040".

Q20. Do you think the approach to digital technology set out in the SRN Initial Report puts National Highways on the right track for meeting its vision for 2050?
(Yes / No / Don't know)

Q21 [If applicable] Why not?

Technology can be valuable for prioritising which improvements are needed, including improved provision for NMUs. NH should use the Propensity to Cycle Tool to determine which areas have the greatest need for active travel improvements.

One technological innovation that may present a particularly useful opportunity for increased safety on the SRN – as well as air quality and economic vitality elsewhere – is autonomous lorries. They will likely be safe to operate on the SRN much sooner than on local roads. NH should consider facilitating the development of trans-shipment depots outside urban areas, to allow autonomous lorries to unload to sustainable delivery vehicles such as cargo bikes (see also answer to Q 5).

Q22. What, if any, evidence or other insights can you supply towards the development of the RIS3 equality impact assessment?

Equality assessment should consider how poor walking and cycling conditions disproportionately affect not just people with (physical) disabilities, but also children, women, older people and people with non-physical disabilities.

Q23. What, if any, other comments do you have on the analytical approach?

The approach is fundamentally flawed, as it uncritically accepts the assumption (made under all scenarios in the 2018 National Road Traffic Forecasts quoted in SRNIR, as well as the more recent 2022 National Road Traffic Projections) that road traffic will inevitably continue grow. This is not 'decide and provide' (contrary to the claim made in SRNIR); it is still 'predict and provide'. It is also inherently contrary to meeting 'net zero', which will require a 20% reduction in road traffic.

What is needed instead is a national transport model that can assess the impacts of policy measures (such as road pricing) to achieve reductions. Dr Crispin Cooper of the University of Cardiff has built a proof-of-concept model of this kind to inform recent research by the Green Alliance. DfT needs to overhaul its National Transport Model to be capable of doing likewise. This is essential for any genuine shift to a "decide and provide approach" and thus to inform policy-making for a low carbon era (see also answer to Q 7).

Q24. Are there any other issues you think the government should consider as part of this consultation?

Re detrunking (Q2), the management of road networks should generally take much greater account of the needs of local people.