



*Chartered Institution of Highways and Transportation*

# **Consultation response on behalf of the Chartered Institution of Highways and Transportation**

## **Shaping the future of England's strategic roads**

**Department for Transport**

**July 2023**

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## Executive Summary

**The commitment to multi-year funding settlements for the strategic road network is very welcome but must translate into a robust pipeline of work.**

CIHT welcomes the continued commitment to multi-year funding settlements to deliver a long-term Roads Investment Strategy (RIS). It is however important that National Highways has the internal process and financial headroom to ensure that this translates into the expected volumes of activity on the ground. This has not always been the case with RIS 1 and RIS 2. Continued significant shortfalls of work in its delivery frameworks will over time reduce supply chain confidence and investment, undermining one of the key benefits of establishing the RIS. We would like to see more evidence that lessons from RIS 1 and RIS2 have been learnt and incorporated into decision making process.

**CIHT supports National Highways proposed emphasis in the RIS 3 period on making the most of the existing network and smaller, targeted enhancements.**

CIHT welcomes National Highways (NH) commitment in the Strategic Road Network Initial report to prioritise making the most of the existing network and to take a targeted approach to any enhancements. NH's recognition of the need to prioritise renewal and maintenance of an ageing infrastructure is particularly welcome as is the commitment to align decision making with the PAS 2080 standard for carbon management in buildings and infrastructure. Similarly, we fully support the commitments in the initial report to take a targeted approach to future interventions to improve safety for road users, offer improved connectivity and multi-modal integration at the local level and fulfil the remaining commitments to the Smart Motorway Safety Action Plan.

**The changing financial and policy landscape make now a good time to review and update the deliverability of major schemes carried over from RIS 1 and RIS 2 to ensure they reflect a credible pathway to transport decarbonisation.**

CIHT acknowledges the commitment to complete network enhancement schemes carried forward from RIS1 and RIS2. We are however concerned that this commitment may impair NH's ability to deliver the other priorities identified in the initial report, which with the passing of time have become more pressing. In its recent annual report to parliament<sup>1</sup> the Climate Change Committee notes:

*“At a UK level, various road-building projects have recently been pushed back due to fiscal headwinds. The Government should launch a more strategic review (similar to the Welsh Roads Review) to assess whether these projects are consistent with its environmental goals.”*

We support the proposal of a thorough review of the major enhancement schemes that the Department for Transport (DfT) and National Highways have already committed to. We are keen to see greater transparency on how DfT and NH have concluded that the proposed large enhancement schemes are consistent with a

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<sup>1</sup> Climate Change Committee (2023) [Progress in Reducing Emissions – 2023 Report to Parliament](#)

credible pathway to transport decarbonisation. We suggest that any strategic review should take a more holistic approach. The question set for road decision makers identified in the recent paper by the Roads Investment Scrutiny Panel<sup>2</sup>, chaired by CIHT Vice President Professor Glenn Lyons would be a useful place to start setting the terms of reference for this review.

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<sup>2</sup> Roads Investment Scrutiny Panel (2023) *Key Questions for Roads Investment and Spending*

## RIS3 strategic objectives

RIS3 has 6 strategic objectives:

1. Growing the economy
2. Improving safety for all
3. Network performance to meet customer needs
4. A technology enabled network
5. Managing and planning the SRN for the future
6. Improved environmental outcomes

**5. What level of importance, if any, do you assign to the RIS3 strategic objective of:**

	Very important	Important	Neither important or unimportant	Unimportant	Very unimportant	Don't know
growing the economy?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
improving safety for all?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
network performance to meet customer needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a technology-enabled network?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
managing and planning the strategic road network for the future?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Very important    Important    Neither important or unimportant    Unimportant    Very unimportant    Don't know

improved environmental outcomes?



Why?

According to a [recent CIHT survey](#), conducted in February 2023, our membership has ranked the 6 strategic objectives for RIS3 according to their importance from 1 (higher importance) to 6 (lower importance). The objectives were ranked as follow:

1. **Improving safety for all**
2. **Improved environmental outcomes**
3. **Network performance to meet customer needs**
4. **Managing and planning the Strategic Road Network for the future**
5. **Growing the economy**
6. **A technology-enabled network**

Below are some considerations of the top 3 objectives.

### **Safety**

48% of respondents identified safety as the number one objective for RIS3. More specifically, respondents highlighted how the maintenance of the Strategic Road Network needs to be prioritised to ensure a safe and high-quality performing network. When asked to provide comments or additional objectives, respondents highlighted the need to support the transition towards decarbonisation, active travel and a more sustainable transport system where car mileage is reduced.

CIHT welcomes National Highways statement that *“Safety is our top priority...for everyone who uses or works on our roads, for all our people and for the communities alongside our network”*. However, we are not convinced that this message is reflected in National Highways *“Sustainable approach to road investment”* (p.11) where it is stated that safety should be addressed after the allocation of investments to keep the network in good condition and to increase multimodal transport offers. CIHT encourages National Highways to revisit this point and ensure that safety is a key principle that shapes all types of investments, the whole delivery process of future schemes and accounts for all users and communities affected by the network.

### **Improved environmental outcomes.**

Respondents to our survey identified the need for the next Road Investment Strategy to be a driver and enabler of sustainable travel choices towards the use of public

transport and active travel. Moreover, we encourage National Highways to account for the impacts of its work on the wider environment, consisting both in climate change and biodiversity losses. The current environmental crisis needs to be addressed with an investment priority that tackles both ecosystem management and Net Zero.

### **Network performance to meet customer needs**

Our survey results highlighted how the Strategic Road Network has geographically and socially unbalanced impacts on different people and communities. Specifically, we encourage National Highways to consider how the network can enable people to choose affordable and accessible Net Zero travel solutions throughout England.

## **National Highways Strategic Road Network initial report (SRN IR)**

The [initial report](#) sets out National Highways' understanding of what its customers want, a safe, reliable network, which:

- supports net zero
- support better environmental outcomes
- is integrated
- is customer focussed

Having assessed the current state of its network and future trends, the initial report identifies the challenges that National Highways needs to address in the third road period in working towards its long-term vision and uses this insight to set out its plans. It identifies 9 focus areas in how it will respond to those challenges, split across 3 groups.

How much its customers will travel:

- growth and levelling up
- car travel

- freight and logistics










How its customers will experience travel:

- safety
- digital
- decarbonisation

How it will manage its network towards:

- customer experience
- sustainable network development
- asset resilience

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

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

If no why not?

CIHT welcomes the focused approach to support sustainable development, recognising the different impacts the network has in different locations and the willingness to prioritise more locally focused schemes that can deepen integration of modes, roads and hubs.

However, we note that the analysis in the initial report suggests that National Highways are in effect planning to accommodate predicted traffic growth. This does not seem consistent with National Highways' stated goal of shifting decisively away from *predict and provide* decision making towards a more strategic *decide and provide* approach. We are particularly concerned about the impact of this approach on England's ability to achieve transport decarbonisation within a net zero economy.

This reflects our wider concern that while National Highways have a clear, PAS 2080 aligned vision and pathway for decarbonisation of its construction and operations activity, its vision for how it will contribute to bringing down carbon associated with use of its network is much less well developed. In part this reflects the limits of NH's mandate as the operator of the physical network. In its most recent annual report to parliament the Climate Change Committee (CCC) is very clear that central government needs to act in key areas including clarifying the role of reduction in demand for car travel in achieving Net Zero and ensuring that roads investment policy is aligned to its goals. We call on DfT to respond rapidly to the CCC's advice.

### **Planning for the third road period (2025 to 2030)**

To meet National Highways' vision for the third road period and address the forecast challenges, the SRN Initial Report sets out a series of proposals. These proposals are grouped under five core themes:

- improving safety for all
- making the most of the network
- evolving NH customer and community services
- driving decarbonisation and environmental sustainability
- taking a targeted approach to enhancing the network

**8. To what extent do you agree or disagree with National Highways' approach to improving safety on its network?**





Strongly agree



Agree



Neither agree nor disagree



Disagree



Strongly disagree



Don't know

CIHT welcomes the commitment of National Highways to achieve a Zero Harm Network based on the Safe System Approach. We encourage National Highways to ensure that the sufficient financial capacity will be in place during the next investment period to ensure a consistent delivery of safety objectives.

We also encourage National Highways to further develop the *safe speed* pillar on its Zero Harm Network approach, specifically in terms of developing a speed management policy.

As highlighted by the Road Investment Scrutiny Panel <sup>3</sup> :

*“One option for delivering road safety improvement is speed management. While National Highways and other authorities have sought to adopt the internationally-recognised Safe Systems model to support planning and decision-making in this area, it is unclear how far the safe speeds pillar of the model is in practice being pursued, and if so whether it is with the same intensity as efforts directed towards safe roads and roadsides.*

*There is a well-established evidence base showing how speed management could play a role in reducing the incidence and severity of road crashes, with the associated benefits of improving traffic flow, potentially reducing the demand for new capacity, reducing emissions and improving air quality. It could also deliver more subtle benefits, such as improving the feeling of safety for some groups of road users, potentially improving the distributional impact of measures.”*

Road safety will be as important, if not more important now that plans for new Smart Motorways have been cancelled. Public concern is mainly around stopped vehicles, but these are a very small proportion of all collisions (the proportion ranges from 2.36% for controlled motorways, 2.99% for conventional motorways to 5.26% for All Lane Running motorways). Looking at the evidence provided by previous Smart Motorways Stocktake reports, more fatalities happen per mile travelled on traditional motorways than Smart Motorways. So, despite users *feeling* safer on traditional motorways, it

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<sup>3</sup> [Key questions for road investment and spending \(worktribe.com\)](https://www.worktribe.com)

could well be the case that we see more fatalities now than we would have if the Smart Motorways project had continued.

CIHT welcomes the proposal to continue working towards achieving the commitments set out in the Smart Motorway Safety: Evidence Stocktake and Action Plan and hopes that as further evidence is gathered this can be effectively communicated to help address the safety concerns of the public.

### 10. To what extent do you agree or disagree with National Highways' approach for making the best use of the existing Strategic Road Network?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

### 12. To what extent do you agree or disagree that National Highways should evolve its:

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
customer offer?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
community offer?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
proposals for designated funds?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### If you disagree, why?

CIHT encourages National Highways to take the steps forward to create partnership with local authorities to support local travel plans, especially to link the Strategic Road Network with local roads to allow for seamless interchange between modes of transport and specifically between active travel for local journeys and public transport

for long distance journeys. We recognise that the level of coordination that this will require is extensive, however we believe that National Highways has the established leadership to guide the integration required to make roads in England a valuable and generative asset for a net zero economy.

CIHT would recommend that a joint transport/planning integration team is established between National Highways and Active Travel England. Both National Highways and Active Travel England are statutory planning consultees for housing developments.

National Highways is a statutory planning consultee, providing recommendations to inform planning for over 150,000 new homes per year.

Active Travel England is now officially a statutory consultee on all planning applications for developments equal to or exceeding 150 housing units, 7,500 m<sup>2</sup> of floorspace or an area of 5 hectares.

This will see Active Travel England reviewing around 3,100 applications a year, equating to 60% of new homes. The new role will enable Active Travel England to help planning authorities in their work to implement good active travel design – for example, by ensuring developments include walking, wheeling and cycling connectivity to schools and local amenities. This will help improve public health, save people money and reduce harmful emissions. Building in active travel at design stage will also help to avoid big increases in vehicle traffic and reduce the need for costly upgrades to major road junctions or other corrective action in the future.

There would be benefit in teams from National Highways and Active Travel England collaborating to offer solutions on planning developments so that NH can demonstrate action towards their aims of: ‘Our customers are also expecting more from us about supporting journey choice across different modes, including active travel options such as walking and cycling.’

### 13. To what extent do you agree or disagree 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

#### 14. What proposals do you disagree with and why?

We are concerned that NH's approach to capacity enhancement on the SRN could inadvertently lock in levels of road user emissions incompatible with a credible pathway to Net Zero.

NH's Initial Report states that:

*The advice from the Climate Change Committee shows that some traffic growth is still possible in meeting the Sixth Carbon Budget. It emphasises the importance of other factors including the shift to electric vehicles and increased vehicle efficiency, alongside other, broader transport policies that are compatible with the UK's net zero trajectory.*

The CCC's latest annual report to parliament however warns against an over-reliance on technology solutions and that the quantified impact of policies in the government's carbon budget delivery plan will be insufficient to meet the UK's carbon reduction aspirations. In response, the CCC reiterates the call in its 2022 report for government to clarify the role for reduction in car travel and ensure that key enablers, including road building decisions are aligned to this view.

The CCC also notes that:

*At a UK level, various road-building projects have recently been pushed back due to fiscal headwinds. The Government should launch a more strategic review (similar to the Welsh Roads Review) to assess whether these projects are consistent with its environmental goals*

We support the proposal of a thorough review of the major enhancement schemes that the Department for Transport (DfT) and National Highways have already committed to. We are keen to see greater transparency on how DfT and NH have concluded that the proposed large enhancement schemes are consistent with a credible pathway to transport decarbonisation. We do however suggest that any strategic review should take a more holistic approach. The question set for roads decisions makers identified in the recent paper by the Roads Investment Scrutiny Panel<sup>2</sup>, chaired by CIHT Vice President Professor Glenn Lyons would be a useful place to start setting the terms of reference for this review.

In the interim we would like to see government act on the CCC's advice that all scheme appraisal for network capacity expansion projects, should give detailed consideration to DfT's *mode balanced* and *vehicle led* decarbonisation scenarios. These are included in the 8 scenarios published in December 2022 by DfT as part of its latest National Road Traffic Projections. This should help guard against the risk of defaulting to *predict and provide* decision making based on use of DfT's core scenario.

## 15. To what extent, do you agree or disagree with National Highways' approach for its future enhancements programme?



Strongly agree



Agree



Neither agree nor disagree



Disagree



Strongly disagree



Don't know

CIHT supports National Highways targeted approach to future enhancements and the focus on smaller local schemes to tackle socio-economic issues and enable growth.

As stated in the Initial Report, with regard to supporting sustainable growth (p.73):

“It will be vital to consider how we manage our network and its use in a way that is sustainable and helps to meet the *Sixth Carbon Budget*.

...In developing RIS3, we have also considered how we can apply the principles of PAS 2080 more broadly at our strategic planning level. This means challenging the root cause of construction and only delivering schemes where the problem cannot be fixed through other approaches.”

Namely PAS 2080 has been described in the Initial Report as: “Build nothing, Build less, Build clever, Build efficiently”.(p.73)

We support the commitment to assess all options against PAS2080 for managing carbon in buildings and infrastructure, from their construction and maintenance to their use.

We encourage National Highways to consistently apply the PAS 2080 hierarchy to all decision making processes for all schemes already committed to or under evaluation, to ensure that low carbon solutions to enhance capacity are prioritised.

## National Highways performance

National Highways performance framework brings together the requirements that it is committed to achieving.

This includes targeted:

- key performance indicators
- performance indicators, which together make up the suite of RIS performance metrics,
- descriptive commitments

### **17. To what extent do you agree or disagree with the assessment in the SRN Initial Report on the most important performance outcomes to measure?**



Strongly agree



Agree



✗ Neither agree nor disagree



Disagree



Strongly disagree



Don't know

CIHT calls for more comprehensive review on the use and analysis of the performance outcomes to measure, specifically an indication of the benchmark against which they will be assessed.

We feel like the Strategic Road Initial Report does not provide enough information for a more structured comment on the measures. We encourage National Highways to consider the recent paper by the Road Investment Scrutiny Panel- Key questions for road investment and spending<sup>4</sup>.

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<sup>4</sup> [Key questions for road investment and spending \(worktribe.com\)](https://www.worktribe.com)

