

September 2024



Department for Transport Capital Spend Review:
Submission from Transport Action Network



**Cancel New Roads
To Boost Growth**

Kickstart Labour's growth Mission: Cancel Conservative road schemes, fix potholes, invest in public transport, slash the deficit

"If we cannot afford it, we cannot do it"

Chancellor of the Exchequer

In this submission to the Department for Transport's transport infrastructure review to scrutinise the DfT's capital spend portfolio, Transport Action Network (TAN) invites the new Secretary of State for Transport Louise Haigh MP to finish the process begun by the new Chancellor of the Exchequer Rachel Reeves MP on 29 July 2024 when she cancelled the unaffordable A303 and A27 road schemes: namely to cancel the rest of the Conservatives' roads programme in England and pause any schemes that might have merit for further scrutiny.

The very next day on 30 July, Transport Secretary Louise Haigh MP informed Parliament that £2.9bn of the £22bn public spending gap this year is from unfunded transport commitments¹. She duly commissioned an internal review of the Department for Transport's capital spend portfolio.

The review is to support the development of Labour's new long-term strategy for transport, creating a modern and integrated network with people at its heart. It will allow the Secretary of State to move quickly and make recommendations about current and future schemes.

It also builds on the five strategic priorities announced by the Transport Secretary immediately after Labour's General Election victory:

- Improving performance on the railways and driving forward rail reform
- Improving bus services and growing usage across the country
- Transforming infrastructure to work for the whole country, promoting social mobility and tackling regional inequality
- Delivering greener transport
- Better integrating transport networks².

Transport Action Network (TAN) helps communities press for better and more sustainable transport through investment in bus and rail services and active travel. We also seek better maintenance of existing roads, especially tackling the scourge of potholes. We have consistently sounded the alarm on the damaging consequences of the previous Conservative Government's outdated obsession with road building.



“A modern and integrated network with people at its heart”

Secretary of State for Transport

TAN supports sensible and proportionate road improvements that are designed to drive modal shift, accelerate decarbonisation and protect nature. However, the Conservatives’ roads programme brings none of those benefits. It was based on ideas debunked 30 years ago that all road building generates economic growth and eases congestion.

In our submission we list the top 16 road projects which should either be cancelled or paused for further scrutiny so they can be reviewed against other transport solutions and wider government priorities. This will ensure value for money for the taxpayer.

It will also relieve planning blight and create clarity ahead of the forthcoming 2024-25 spending review and development of the next Road Investment Strategy, RIS3 (2025-2030). Any available savings should be diverted into fixing the existing road network alongside delivering modern and integrated public transport and active travel networks across the country. This would support modal shift to accelerate decarbonisation while growing the economy, protecting nature and improving both opportunity for all and productivity.



The Conservatives' roads programme is unaffordable

TAN considers the Conservatives' roads programme to be unaffordable as well as being an outdated relic of mid-twentieth century thinking. It will generate vast carbon emissions from both scheme construction and early decades of operation.

The total cost of these 16 road expansions is a staggering £15bn. However, while the figures in the table on page 6 are from National Highways, many are out of date and the total cost is likely to be even higher. With some, like the £9bn Lower Thames Crossing, National Highways has tried to keep costs under control by jettisoning associated road projects needed to make it function, thus hiding the true cost of the scheme.

It is worth noting only two schemes have a Benefit Cost Ratio (BCR) of more than 3 and that is being optimistic given costs are likely to have risen since official figures were last published. Most of the roads listed have lower BCRs with many at risk of costing more than any benefits they might realise. The £1.5bn A66 scheme has an adjusted BCR of just 0.92 and will harm national landscapes. While an alternative public transport scheme like the delayed Portishead – Bristol rail project will cost around £200m and with an initial BCR of over 2 has a high public value. The scheme would reduce congestion on the M5, reduce car-km by 4,000 in morning peak and 2,000 in evening peak on A369 and provide 50,000 people with a station in their direct catchment. This will deliver modal shift to accelerate decarbonisation, increase opportunity and grow the economy. It, and schemes like it, represent a far better investment.

The following table shows the top 16 National Highways schemes by value that remain in the Conservatives' roads programme, where main works have not yet started. In many cases, a Full Business Case (which includes all the information needed to make a decision on whether the scheme should go ahead or not) has not been produced or approved. TAN asks the Secretary of State for Transport to cancel all those that are unaffordable and to pause the rest subject to the outcome of next year's spending review, alongside a more in depth assessment similar to that carried out by the Welsh Government's 2021 Roads Review³.

In addition, the DfT's Large Local Majors (LLM) programme, which funds local authority roads, needs reviewing. It contains many unaffordable, deeply unpopular and highly damaging schemes, particularly for nature. Examples include the £274m Norwich Western Link and £140m Shrewsbury North West Relief Road. Other funding streams that facilitate road building also need scrutiny, such as the Housing Infrastructure Fund.

The unaffordable Conservatives' roads programme is not the only legacy issue facing the new Labour Government. It has also inherited a structure that is not fit for purpose.

National Highways is a company wholly owned by the UK Government and supposedly accountable to the Department for Transport (DfT). It is tasked with managing and improving England's motorways and major 'A' roads. Roads in Scotland and Wales are fully devolved. Yet all too often National Highways is allowed to mark its own homework and has delegated authority to approve its own Full Business Cases for schemes up to £500m with no Departmental or ministerial oversight.

It is also rarely held to account for its failings, for example, National Highways claims that safety is its number one priority⁴, yet the Office of Rail and Road's (ORR) annual assessment found it was "not on course to achieve the RIS2 safety target... and that increasing traffic levels would make this harder to achieve"⁵. Additionally, safety didn't feature in the ORR's recent investigation, despite National Highways also being off course for its ambition of Zero Harm by 2040. It is also failing to tackle flooding on its network⁶ (see page 13).

The Transport Secretary's capital spend review therefore is an opportunity to look at reforming National Highways and its accountability mechanisms, which consistently fail to deliver on wider Government objectives and, worse still, actively undermine them.

Conservative Roads Programme: Biggest Schemes

Scheme	Cost – £m	Initial BCR ¹	Adjusted BCR ²	Value for money ³	Carbon emissions (tCO ₂ e) ⁴	Other issues
Lower Thames Crossing	9,000 ⁵	0.48 ⁶	1.22 ⁷	Low	6,600,000 ⁸	Opposed by all local MPs and councils. Impacts on Kent Downs National Landscape (AONB), ancient woodland and Thames Estuary SAC
A66 Northern Trans-Pennine	1,490 ⁹	0.48 ¹⁰	0.92 ¹¹	Poor	2,709,014 ¹²	Impacts on two SACs and the North Pennines National Landscape (AONB). Subject to legal challenge
A12 Chelmsford to A120 widening	1,300 ¹³	0.8 ¹⁴	1.7	Medium	1,964,185 ¹⁵	Subject to legal challenge
A46 Newark	686.4 ¹⁶	0.83 ¹⁷	1.2 ¹⁸	Low	683,200 ¹⁹	Net worsening of air quality
A358 Taunton to Southfields	397 ²⁰		1.2 ²¹	Low	2,043,000 ²²	Opposed by parish councils
A5036 Port of Liverpool Access Road	335 ²³				555,232 ²⁴	Opposed by local council, Regional Mayor and MPs. Severely damages country park
A1 Morpeth to Ellingham	261.6 ²⁵		0.8 ²⁶	Poor	2,487,000 ²⁷	Threatens ancient woodland
M60 Simister Island	230 ²⁸	0.86 ²⁹	1.17 ³⁰	Low	213,103 ³¹	Increases noise and air pollution near schools
A38 Derby Junctions	229 ³²	33	34		279,313 ³⁵	Threatens 11.38 hectares of trees. Subject to legal challenge
M3 Junction 9	215 ³⁶	1.44 ³⁷	1.81 ³⁸	Medium	176,870 ³⁹	Impacts on South Downs National Park and opposed by the Park Authority
M54-M6 link road	200 ⁴⁰	3 ⁴¹		High	206,860 ⁴²	Carbon emissions are an underestimate, as only up to 2032
A47 North Tuddenham to Easton	195.27 ⁴³	1.7 ⁴⁴	2.2 ⁴⁵	High	596,790 ⁴⁶	Links to the contentious Norwich Western Link
A57 Link Roads	180.6 ⁴⁷	1.45 ⁴⁸	2.45 ⁴⁹	High	438,837	Increases pressure for more road building in Peak District National Park
A46 Coventry Junctions	112.5 ⁵⁰				51	
A47 – A1 Thickthorn Junction	91.2 ⁵²	1.7 ⁵³	2.4 ⁵⁴	High	163,751 ⁵⁵	
A47 Blofield to North Burlingham	89.5 ⁵⁶	2.4 ⁵⁷	3.3 ⁵⁸	High	159,102 ⁵⁹	
Totals	£15 billion				19,277,417 tonnes of CO₂	

Conservative Roads Programme

Scheme:

Lower Thames Crossing

Cost: **£9bn**

Adjusted Benefit Cost Ratio*: **1.22**

Carbon emissions**: **6,600,000** (tCO₂e)

Scheme:

A66 Northern Trans-Pennine

Cost: **£1.49bn**

Adjusted Benefit Cost Ratio*: **0.92**

Carbon emissions**: **2,709,014** (tCO₂e)

Scheme:

A46 Newark

Cost: **£680m**

Adjusted Benefit Cost Ratio*: **1.2**

Carbon emissions**: **683,200** (tCO₂e)

Scheme:

M60 Simister Island

Cost: **£230m**

Adjusted Benefit Cost Ratio*: **1.17**

Carbon emissions**: **213,103** (tCO₂e)

Scheme:

A12 Chelmsford to A120 widening

Cost: **£1.3bn**

Adjusted Benefit Cost Ratio*: **1.7**

Carbon emissions**: **1,964,185** (tCO₂e)

Potential Mission-compatible regional schemes

Scheme:

Ely Area Capacity Enhancement

Transforming rail freight connections between Port of Felixstowe, the Midlands & the North

Cost: **£500m**

Scheme:

Cumbrian Coast Railway Line Electrification

Would allow clean, electric trains to run direct from Manchester to Lake District and increase freight

Cost: **£16m (in 2011)**

Scheme:

Nottingham-Newark-Lincoln Rail Improvements

Transform slow, infrequent services between two cities

Cost: **£18m**

Benefit Cost Ratio: **2.0**

Scheme:

West Yorkshire Mass Transit Phase 1

Provides two lines between Leeds City Centre and White Rose (Leeds Line), Leeds City Centre and Bradford City Centre (Bradford Line)

Cost: **£2bn**

Benefit Cost Ratio: **2.0**

Scheme:

Haughley rail junction upgrade, Suffolk

To remove 150,000 freight lorry journeys a year from the A14

Cost: **£20m**

* The Adjusted Benefit Cost Ratio (BCR) is a calculation that values all the benefits (time savings, etc) and costs (carbon emissions, etc) of a scheme, to demonstrate whether the scheme represents good value for money. It is inflated to include 'wider economic benefits'. A BCR of less than 1 indicates that a scheme's costs are higher than its benefits and therefore building it doesn't make sense.

** Construction and operational carbon over 60 year appraisal period, measured in tCO₂e

It's a myth that road building grows the economy and eases congestion

It has been 30 years since the myth that road building is good for the economy and eases congestion was debunked. These issues were addressed in reports from the Standing Advisory Committee on Trunk Road Assessment (SACTRA) commissioned by the Department for Transport⁷. The reports accepted the existence of the phenomenon of 'induced traffic' which means that increasing capacity leads to more traffic causing congestion on the wider road network to fairly quickly knock out any short term benefits from the new road. In a separate report, SACTRA also showed that the evidence that road building is good for the economy in a developed country was weak. Department for Transport analysis in 2017 states there is a lack of evaluation evidence on the impacts on economic performance of long-distance intercity road investments⁸. This is a position that still pertains today.

The SACTRA reports caused even John Major's Conservative Government to reduce its road building ambitions and then led to the Labour Government under Tony Blair slashing the inherited Conservatives' roads programme from 150 schemes to 37 by 1998.

Yet the road building lobby is tenacious. Even with the growing climate and nature crises and the carbon emissions and other pollutants from motorised transport, the lobby has played on the ideological predispositions of the Conservatives to produce a major roads programme. This threatens to add to the nation's deficit, make congestion worse, undermine modal shift and decarbonisation and harm nature.

Even a cursory look at the Department for Transport's 2022 National Road Traffic Projections⁹ shows how congestion will worsen across the country despite all the new roads promised by the Conservatives.

A succession of studies has highlighted a key reason for the UK's low productivity is actually due to the lack of availability of good public transport in cities other than London. Centre for Cities research shows that poor urban transport limits people's job opportunities which negatively impacts the productivity and economic performance of UK big cities, costing the economy more than £23.1 billion per year¹⁰.

Not only is the previous Conservative government's roads programme unaffordable but it would fail on its own terms. Labour's transport infrastructure review gives it a once-in-a-generation chance to consign this outdated and wasteful approach permanently to the past.





There are better ways to invest any available money

The Conservatives' roads programme should be cancelled to reduce the deficit but there are innumerable ways in which some of the money saved could be reinvested for much greater benefit to society.

Our existing road network is critical for facilitating journeys by bus, cycle, car and lorry. The cost of maintaining and indeed future-proofing that network is already a huge burden for public spending.

Yet, if some of the money saved from cancelling new schemes were invested in other ways, it could significantly reduce the number of potholes and reduce the £16.3bn maintenance backlog in England's local roads¹¹. The National Audit Office said fixing our roads would give an economic return of 7:1, far higher than building new ones¹². Delivering on this essential programme of road works will have a tangible economic benefit with international research showing road maintenance spending creates 16% more jobs per dollar than road building. Spending on public transport created 31% more jobs than road building¹³.

Labour prioritised potholes in its 2024 General Election manifesto, saying "The potholes cratering our roads are a visible sign of the decline after 14 years of Conservative rule."¹⁴ This reflected a growing public concern about the state of our roads¹⁵.

Furthermore, some of the funding saved from the roads programme could be put to work enacting the Labour Government's vision for active travel described by the Transport Secretary in August 2024¹⁶. This reflects the findings of the Eddington Transport Study (2006) stating:





“Small can be beautiful: many of the very high return schemes are small projects including walking and cycling schemes”¹⁷, as well as for making important investments in the rail freight and passenger networks and transforming bus services.

A recent 2024 report by Lord Layard, emeritus professor at the London School of Economics highlights that large road infrastructure such as the Lower Thames Crossing offer very poor value compared to investing in mental health services by a factor of ten.¹⁸

Redeploying funds in this way would support all 5 of Labour’s Missions for Government:

Mission	Benefit from redeploying National Highways new roads programme funds
Kickstart economic growth	Reduce the deficit and reinvest available funds in wealth-generating sustainable transport
Make Britain a clean energy superpower	Reduce carbon emissions from road transport and increase reliance on clean British energy rather than imported oil
Take back our streets	Making our streets safer will help with modal shift and boost decarbonisation. Investing in public transport and active travel, will turbo charge that change while increasing opportunities
Break down barriers to opportunity	Increase access to jobs and services through better local public and active travel provision (many job seekers do not have a car)
Build an NHS fit for the future	Reduce the huge burden on the NHS and emergency services by the 30,000 people killed or seriously injured every year on our roads. Modal shift would lead to a healthier population, reducing long term pressure on the NHS

How should road building be assessed in the future?

TAN is not opposed to all road building but wants to see a rational, transparent and modern process for assessing need, similar to that used by the Welsh Labour Government.

The Welsh Labour Government's road building tests

All new roads in Wales need to contribute towards achieving modal shift – both to tackle climate change and to reduce congestion on the road network for freight. As a result, the Welsh Government will continue to consider investment in roads (both new and existing) if scheme proposals pass the following four tests¹⁹:

1. supports modal shift to public transport and active travel and reduce carbon emissions
2. improves safety through small-scale changes
3. adapts to the impacts of climate change
4. provides access and connectivity to jobs and centres of economic activity in a way that supports modal shift

“In developing schemes, the focus should be on minimising carbon emissions, not increasing road capacity, not increasing emissions through higher vehicle speeds and not adversely affecting ecologically valuable sites”

Welsh Government 2021

This is also something that the Climate Change Committee recommended (R2023-148):

“Conduct a systematic review of current and future road-building projects to assess their consistency with the Government’s environmental goals. This should ensure that decisions do not lock in unsustainable levels of traffic growth and develop conditions (which can be included in the Roads Investment Strategy 3 process and beyond) that permit schemes to be taken forward only if they meaningfully support cost-effective delivery of Net Zero and climate adaptation.”²⁰



Quite often, the answer to an issue (such as safety or congestion) on the road network is not to build a bigger road as that can cause wider problems. Currently however, National Highways tries to solve the problem using a default position of building a bigger road, even when this intervention will only slow down the increase in congestion, rather than reduce it. Given its remit is purely roads based, it is in no position to consider and deliver a non-road alternative which might provide a better solution such as improved passenger and freight rail services. This is particularly pertinent for road schemes such as the Lower Thames Crossing, A66 Northern Trans-Pennine and the A5036 Port of Liverpool Access Road.

This current failure to make a holistic assessment was highlighted as far back as 2006 by the Labour Government's Eddington Transport Study which found that a full range of policy options need to be explored including making better use of existing networks: "it has become clear that some schemes are promoted as solutions without having defined the problem and without having considered a range of options."²¹

Roads policy for England needs to sit in the context of a national transport strategy that covers all modes, similar to the one developed in Wales²². This is precisely what is advocated in Juergen Maier's Rail and Urban Transport Review published on 21 August 2024 and commissioned by the present Transport Secretary when in opposition²³.

Such a strategy needs to address the increasing challenges brought about by climate change. The increased stress on the road network due to extreme weather events could also lead to greater maintenance requirements, as will greater traffic levels, further exacerbating a situation of traditional underinvestment. National Highways' failure on adaptation is illustrated by this recent comment by the ORR which found: "drainage resilience performance had declined from the previous year... 36% of the SRN had an observed significant susceptibility to flooding...five percentage points worse than the previous year."²⁴



Private finance won't make bad road schemes good

Some have suggested new roads such as the £9bn Lower Thames Crossing could be taken forward using private finance. However, **a bad investment is a bad investment whether taken forward using public or private finance.** Both the head of the National Audit Office and former Cabinet Secretary Lord O'Donnell have recently warned of the pitfalls of private finance for major infrastructure projects.²⁵

Even if new infrastructure can be kept off the UK's books, it is still an investment that has to be paid for by the public, directly or indirectly. In most cases, privately financed roads would still undermine productivity, growth and wider Government aspirations around modal shift to accelerate decarbonisation, to protect nature and for a cleaner, greener society with greater opportunities.

Conclusion

TAN urges the Secretary of State for Transport to kickstart Labour's growth Mission by cancelling the Conservatives' roads programme, fixing potholes and maintaining the current road network, investing in public transport and active travel, and slashing the deficit.

We would be delighted to provide further information and advice to support the views expressed in this paper if this would be helpful.

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