



Transport Action Network

Response to:

**Future road investment
consultation (route
strategies)**

Introduction

Transport Action Network (TAN) welcomes the opportunity to input into the consultation on future road investment and route strategies. We firmly believe that a new approach to transport is required with a more neutral strategic oversight to deliver transport, rather than exclusively road solutions, with road investment then flowing, if required, from that holistic oversight.

The preparation for RIS3 offers an opportunity to rethink the approach to roadbuilding and how roads are managed.

The climate emergency

Parliament declared a climate emergency in 2019 and shortly after net-zero was written into law. Since then, the UK Government adopted the 6th carbon budget, equivalent to a 78% reduction in carbon emissions by 2035 (on 1990 levels) and adopted a 68% cut in carbon emissions by 2030 (on 1990 levels) as part of its Nationally Determined Contribution ahead of COP26.

It is clear from COP26 that far more urgent action is required to keep the Paris Agreement's ambitions to limit warming to 1.5 degrees Celsius alive. There is also concern as expressed by the Climate Change Committee (CCC) that *"clear targets and a credible policy to reduce traffic"* is one of the *"important areas [that] remain to be resolved"*¹. The CCC also says that: *"While the recognition of the need to reduce traffic growth is a big step forward, a more comprehensive set of measures and more measurable targets (including on total car-kilometres) are needed to give confidence that the continuing trend of traffic growth can be reversed."*²

Furthermore, the CCC goes on to state that: *"We still have some concerns around the relative size of the road-building budget compared to these funding pots [for walking, cycling and public transport], however."*

This would all point to the need to reduce, not increase, traffic to start to bring transport back on track in terms of carbon reduction, given there has been very little drop in emissions to date since 1990.

A new approach is needed

Given that new roads create new traffic and increase carbon emissions through a variety of means, many of which are not captured at present, there should be a moratorium on all roadbuilding. The critical need to dramatically reduce carbon emissions by 2030 should

¹ Table 2, page 28, Independent Assessment of the UK Net Zero Strategy – CCC, October 2021

² Progress summary, page 39, Independent Assessment of the UK Net Zero Strategy – CCC, October 2021

result in RIS3 not containing new road proposals but should focusing instead on maintenance and renewal, tackling historic problems associated with the Strategic Roads Network (SRN). These include addressing safety issues through technology, speed, or small-scale interventions, improving driver information and tackling some of the significant environmental impacts on local communities and the wider environment from air and noise pollution, severance and visual intrusion. The RIS3 budget should also be focused on improving outcomes for biodiversity and wildlife, such as retrofitting green bridges onto schemes that have severed important wildlife habitats.

Given the need to reduce traffic levels, many of the reasons behind new roads fall away. A number of studies have repeatedly highlighted the need for significant traffic reduction of 20% or more. Traffic reduction on this scale completely undermines the need for most if not all new roads and certainly National Highway's constant insistence that only dual carriageways are capable of handling the projected traffic growth. This is particularly true for the A358 Taunton to Southfields and A27 schemes, where there might be a case for some small-scale interventions, but not the over the top and highly damaging proposals currently on the table.

So far, we have not seen any evidence that sustainable alternatives are properly considered, with them being dismissed in a very superficial way. This was certainly true for the A27 Arundel Bypass. Little or no thought is given to the viability of packages of measures to address the perceived issues, including demand management measures. Given the impact of some proposals such as the A3056 Port of Liverpool Access Road which involves building a dual carriageway down the middle of a long, linear Country Park with devastating consequences, National Highways really needs to develop a new approach.

Many of the short-term gains made by building new roads are often wiped out by out-of-town car dependent developments which rapidly fill up the new road and overload the surrounding road network. This fuels further car use and increases overall levels of congestion. It does not solve the problem, merely exacerbates it. Road building needs to be unhitched from providing for new housing development which is undermining the strategic role of the SRN.

There are significant issues with many of the schemes identified as potential pipeline schemes for RIS3, such as the A27 schemes which will increase traffic growth and impact on the South Downs National Park and other protected landscapes. Likewise, the undefined "A303 Phase 2 upgrade" schemes which would increase traffic, carbon and pressure on the South West, and the Tilbury Link Road which is part of the Lower Thames Crossing and will lead to reliance on road freight and divert funds from rail freight alternatives.

Many of the "existing strategic studies" and new studies for the RIS3 period also perpetuate outdated predict-and-provide strategies from the 20th century, and will lead to traffic growth rather than traffic reduction. Of particular concern is the Trans-Pennines Tunnel study which would significantly impact on the Peak District National Park. Also, the M4-Dorset Coast

study would resurrect outdated, controversial and destructive schemes around the A36/A46/A350, whilst the M60 Manchester North West Quadrant would increase traffic and lock in car based development.

Wider issues associated with the SRN

Noise

Few places are immune from traffic noise, but the SRN is a significant source of noise pollution for both local communities and the wider countryside, including many nationally protected landscapes and nationally important heritage assets. One of the benefits of lockdown was the rediscovery by many people of the joys of birdsong and silence. While having very little travel is not viable in the long term, lockdown highlighted the pernicious invasion that society has suffered from noise. A new approach is needed to reduce noise, wherever possible to reduce health impacts [REF] and increase enjoyment of the countryside.

Whether it be through speed limits, quieter road surfaces, better noise barriers or other measures, an audit of the SRN is required to address where most would benefit further intervention.

The current remedy for homes close to the SRN is to offer them double glazing, which does nothing to address residents' ability to enjoy their garden or the surrounding area. Access to the outdoors and green space, such as gardens, has been demonstrated to be important for public health during the lockdown. Far greater consideration needs to be given to reducing noise levels in nearby gardens and green spaces by tackling the cause of the problem, rather than trying to address some of its symptoms.

Air Pollution

National Highways needs to take far more responsibility for the air pollution that is generated on the SRN. It needs to look at reducing this as much as possible and go beyond what it has done to date. Given the World Health Organisation has significantly lowered its guideline levels for nitrogen dioxide and particulates and stated that there are no safe levels for these pollutants, it is no longer good enough just to reduce pollution to below legal limits.

In the UK these are currently:

Nitrogen dioxide (annual mean): $40\mu\text{g}/\text{m}^3$

Particulates (PM_{2.5}): $25\mu\text{g}/\text{m}^3$

The new WHO guideline levels³ are:

³ [Ambient \(outdoor\) air pollution](#) – World Health Organisation, September 2021

Nitrogen dioxide (annual mean): $10\mu\text{g}/\text{m}^3$

Particulates ($\text{PM}_{2.5}$): $5\mu\text{g}/\text{m}^3$

This demonstrates that just reducing pollution to below legal limits will still result in significant impacts on human health and that's why more needs to be done. A significant number of roads in the SRN run close to or through urban areas and these should be investigated to see how air pollution levels could be further reduced.

Severance

New roads almost inevitably increase community severance through increasing traffic both on the SRN and the surrounding road network. They also increase it physically by closing off quieter lanes and rights of way, often with quite substantial diversions in place. Even when diversions may not be considered to be excessive, the impact on the right of way, certainly for recreational purposes is significant. The diversion often routes the right of way alongside a faster, noisier and more polluted road, making the diversion far from pleasant. Crossing the new road can also be far from attractive. Where the local road or right of way now crosses a bridge instead of at grade, there may be some local benefit, but this does not happen for every crossing and therefore overall it is difficult to see that the road delivers any overall benefits.

Local communities can become more isolated and cut off from neighbours with the current approach and is one reason why there is so much opposition to the A358 Taunton to Southfields dual carriageway and why inspectors recommended (in part) against the A303 Sparkford to Ilchester dual carriageway.

RIS3 needs to focus on addressing the severance the SRN has created, rather than making things worse. It needs to make a positive contribution to the health of the nation by getting people to be more active by reducing severance and encouraging people to walk and cycle more for local journeys.

Public transport

More thought needs to be given to public transport using the SRN. Whether it be through smarter signalling, bus and coach lanes, better bus stops or other measures, greater priority should be given to public transport, not just for its lower carbon footprint but because of its more efficient use of road space.

The same is true for public transport services crossing the SRN. NH needs to take greater responsibility for the traffic it is generating and provide the necessary capability to allow public transport services crossing the SRN, often at busy junctions, a priority route through the most congested areas within 500m of the network. At present, many of these issues are ignored.

Active travel

Increasing active travel is a Government priority and should be for NH too, for carbon, health and wider societal reasons. However, all too often NH has not delivered high quality infrastructure, has ignored its own standards and can often end up making active travel less attractive, even when it has nominally installed pedestrian or cycle infrastructure. The latter can come about when pedestrians and cyclists are expected to make numerous crossings, taking an extremely long time just to get around a junction. An example of this are the designs put forward for the A27 Worthing to Lancing upgrade which required pedestrians crossing diagonally over the junction at Offington Corner to use seven crossings. The length of time this would take would deter everyone but the most desperate and encourage most people to drive across it instead, exacerbating the congestion in this area. It would also unnecessarily expose people to excessive air and noise pollution while they wait for signals to go green, or to dash across while they were red potentially putting themselves at risk.

This does not make sense. Either at-grade crossings need to be grossly simplified, or NH needs to provide grade separation for pedestrians and cyclists which would improve safety, attractiveness, reduce exposure to pollution and reduce delays on the road. Not only does it need to stop proposing and building the sort of infrastructure that 'ticks' the boxes but provides few, if any, benefits, NH also needs to go back and retrofit solutions where it can.

NH also needs to think about how it can help increase active travel use and also reduce pressure on the SRN. However, its current approach is to do-minimum for walking and cycling, not seeing it as relevant or important. For example, the building of the A428 Black Cat to Caxton Gibbett will see very little active travel improvement. Putting aside whether a dual carriageway is needed at a time when we must reduce traffic levels, this was the perfect opportunity to deliver a cycle superhighway connecting St Neots to Camborne, connecting with intermediate places such as Croxton and Eltisley. The distance equates approximately to the average distance cycled on one of the Danish cycle superhighways⁴ and given the fairly gentle topography would make such a route viable. There would then be a strong argument for extending this into Cambridge, helping give Camborne, a growing settlement, high quality active travel infrastructure in both directions and helping reduce pressure on the A428.

The building of the new road and the detrunking of the existing A428 provide the perfect opportunity to provide such infrastructure. Without intervention little active travel will happen along this corridor, especially with the road still subject to the national speed limit. There is virtually no active travel provision at present and what there is mostly consists of a few short sections of shared path or cycleway to provide an alternative way of crossing over the new dual carriageway. This will do nothing other than tick a few boxes to say that active

⁴ [Cycle Superhighways – Capital Region of Denmark](#) (2018) – Office for Cycle Superhighways

travel has been accommodated as what's being proposed will hardly encourage more people to cycle along this route.

More generally, greater priority also needs to be given to more high quality, convenient and direct crossing points of the SRN to encourage active travel and reduce the exposure to noise and air pollution caused by diversions. Junctions are especially problematic and need revisiting as these are major blockages for people travelling through an area by active travel. Again, the sheer unattractiveness and difficulty of using them deters many people, encouraging them to use a car instead, if they are able to.

Safety

The current focus of NH seems to be about capacity expansion, with safety tagged onto the back of that as a reason for the need for change. This is despite the fact that increasing traffic through roadbuilding will encourage greater road incidences across the wider road network.

NH needs to take a new approach to safety and actually address the specific issues, which may well be able to be addressed in other ways such as lowered speed limits, enforcement, driver awareness, minor road changes, demand management, etc without the need to expand capacity. This would enable to NH to address more safety issues, more quickly if it was able to roll out cheaper measures.

Given that the drop in road casualties has stagnated in recent years, and without the pandemic, NH was highly likely to miss its safety key performance indicator in 2020⁵. Therefore, it needs to focus much more on how to aim for zero road casualties and target appropriate and more affordable interventions on the worst performing roads to quickly lower casualties still further.

Landscape and biodiversity

Much greater consideration of landscape and biodiversity needs to be taken during the options and design stage. As we saw at the A27 Arundel Bypass, until National Highways was threatened with judicial review by the South Downs National Park Authority, it was ready to ignore its legal obligations to look at alternative solutions, including developing outside of the area.

However, many RIS2 road schemes threaten AONBs / National Parks either directly or indirectly, including A417 Missing Link, A27 Arundel bypass (through increased traffic and impacting its setting), A66 Northern Trans-Pennine, Lower Thames Crossing, etc. Furthermore, at least two potential RIS3 schemes: A27 Chichester bypass and A27 east of Lewes threaten the South Downs National Park.

⁵ Paragraphs 9 – 11, page 4, [Annual Assessment of Highways England End of Road Period 1, 2015-2020: Performance update: November 2020](#) – Office of Rail and Road, November 2020

Much of the impact on landscape, whether nationally designated or not, comes from the direct visual impact and the noise it generates, shattering the tranquillity of an area and undermining its recreational and health opportunities. Roads designed with lower speeds, enable a road to more comfortably fit within the landscape – the faster a road, the straighter it has to be and hence stand out as a visual intrusion. Lower speeds also reduce the noise pollution and impact on tranquillity.

More weight needs to be given to these aspects and not just thousands of small-time savings justifying damaging proposals.

On biodiversity, we are very sceptical of biodiversity net gain. There is no current way of verifying that proposals are sound and that they will actually deliver net gain in the long term. Additionally, not all aspects are currently considered in this equation, such as how does increased nitrogen deposition count against this, or the increase in low level ozone on suppressing plant growth. Another factor is that rising traffic and car use, that current proposals in RIS2 and RIS3 enable, will lead to an increase in road kill. This year has seen a big increase in roadkill due to more people holidaying in the UK⁶

Whether this happens on the SRN or not, the extra traffic that SRN expansion generates also uses local roads so increases in road kill on local roads needs to be partly attributed to SRN projects. How such an assessment of biodiversity net gain is then calculated remains unclear.

Future proofing

The focus of new investment in the SRN should be on future proofing around connectivity and information provision. Indeed, one of the potential longer term gains would be the ability to remove a lot of the visual clutter from huge gantries, electronic signs and even some road signs which currently form a large blight on the landscape. As information technology becomes more widespread over time, information could be sent direct to vehicles for internal display or announcement, removing the need for the intrusive and expensive signs.

Aside from rolling out more vehicle charging points, stopped vehicle technology could also be rolled out on conventional motorways and dual carriageways to improve safety once it has been proven to work.

Maintenance

We would like to see more focus on maintenance and renewal, rather than new build. Keeping the infrastructure that we have in good order to minimise delays and closures to keep the network moving. When this work is done, it should also be used as an opportunity

⁶ [Roadkill rates have jumped as coronavirus travel restrictions forced millions of us to holiday at home](#) - i article, 17 November, 2021

to make other interventions such as improving active travel infrastructure or technology improvements.

Conclusion

For RIS3 and beyond, NH should be focussing on maintenance and renewal plus addressing the long-term severance and environmental issues that the development of the SRN has caused. These have not been adequately addressed to date while new proposals continue to exacerbate issues rather than solve them. This needs to change in order for future investment to offer value for money and to support wider government objectives.

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Transport Action Network provides free support to people and groups pressing for more sustainable transport in their area and opposing cuts to bus services, damaging road schemes and large unsustainable developments

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