



Transport Action Network

Response to:

**Planning ahead for the Strategic Road
Network
Developing the third Road Investment
Strategy**

1 Introduction

- 1.1 Transport Action Network welcomes the opportunity to provide feedback on the DfT's *Planning ahead for the Strategic Road Network: Developing the third Road Investment Strategy* policy paper which outlines the six provisional objectives for the third Road Investment Strategy (RIS3). However, we are concerned that we discovered this document by chance as it has not been circulated widely nor has there been any formal consultation on it. This is despite the objective-setting being a key stage to seek input on as it will define how RIS3 is taken forward.
- 1.2 Indeed, while we are pleased that the six objectives contained within the paper are described as "provisional", the lack of awareness of this document and absence of a formal consultation on it could result in few responses. So, while the document states that the objectives will be reviewed after feedback, in the absence of many responses we are concerned that the objectives will be taken forward largely unaltered. This is of serious concern as we believe that the whole approach to RIS3 needs to be refocused to be compatible with the Government's legal obligations to reduce carbon emissions quickly enough and to support more strongly other Government objectives.

2 Headline Issues

- 2.1 Our headline points about RIS3 are:
1. Its budget should be significantly smaller than RIS2
 2. There should be a moratorium on road capacity expansion and a review of all road building proposals against climate change and mode shift objectives
 3. Maintenance and renewal should be its primary focus
 4. Safety should be a bigger priority and have more targeted interventions on the most dangerous roads on the SRN
 5. Designated funds should be significantly expanded to address historic issues such as community severance, poor active travel and public transport provision and environmental pollution
 6. It should fund off network improvements in sustainable transport to reduce pressure on the SRN and the surrounding road network

3 Need for a new strategic approach

3.1 Tackling the climate emergency

3.1.1 The policy paper is in danger of perpetuating a “business as usual” approach to the strategic roads network (SRN), following the same predict and provide model that was adopted in RIS1 and RIS2. This has failed us for decades, with road transport carbon emissions failing to decline by any significant extent since 1990. The DfT needs a completely different approach for RIS3 if it is to reduce road transport emissions quickly enough.

3.1.2 Despite the DfT recognising the need to reduce traffic to tackle climate change in its Transport Decarbonisation Plan (TDP)¹, the RIS3 policy paper appears stuck in the past, and destined to repeat the same mistakes as RIS1 and RIS2. It proposes to carry forward old schemes from RIS2 and to continue the futile attempt to build our way out of congestion. This is becoming increasingly untenable.

3.1.3 Planning RIS3 presents the opportunity to acknowledge this and to reboot outdated thinking and reframe the Road Investment Strategy as a key instrument to tackle the climate emergency. It is also vital that RIS3 reflects the priorities of the public which is for most investment to be prioritised for maintenance over new road capacity.

3.1.4 The Department for Transport should follow the lead of the Welsh Government, and accept the recommendations of the Climate Change Committee (CCC) to adopt a completely new approach to setting its Road Investment Strategy. In the joint recommendations in its 2021 Progress Report to Parliament², the CCC recommended that:

“Decisions on investment in roads should be contingent on analysis justifying how they contribute to the UK’s pathway to Net Zero. This analysis should demonstrate that the proposals would not lead to increases in overall emissions.”

3.1.5 This recommendation from the CCC (that schemes will only be included contingent on evidence they will reduce emissions) should be included in the Performance Specifications for RIS3, to demonstrate how the RIS **reduces** traffic and carbon emissions. The DfT should use this objective setting phase of RIS3 development to clearly state that reducing carbon emissions from transport is an overriding objective, and the inclusion of a scheme in RIS3 should be contingent on its ability to reduce carbon emissions faster than would otherwise happen.

¹ Ministerial Foreword to [Decarbonising Transport: Setting the Challenge](#) – DfT, March 2020

² Page 20, [Joint Recommendations](#), 2021 Report to Parliament – Climate Change Committee, June 2021

- 3.1.6 The Welsh Government has suspended its roads programme and initiated an independent review³ of how each scheme helps to deliver its objective to reduce carbon emissions and encourage modal shift. This independent review is expected to conclude in Summer 2022. The DfT should likewise use RIS3 as an opportunity to reorient its investment decisions around its decarbonisation objectives.
- 3.1.7 The policy paper currently says that any RIS2 schemes that have not yet completed construction will be automatically included in RIS3 “*without additional assessment in the RIS-setting process*”. While this might be reasonable for schemes where construction has already started it is totally inappropriate for schemes where construction has not begun. There is no justification for the proposed approach which again tries to sidestep proper scrutiny of the roads programme, which at no time has been properly assessed for net-zero or the UK’s Nationally Determined Contribution of a 68% reduction in 1990 emissions by 2030. The entire programme being considered for RIS3 (whether carried over from RIS2, or new schemes) must be assessed altogether within a Strategic Environmental Assessment as required by the Infrastructure Act 2015 and the Strategic Environmental Assessment Directive. They should also have their business cases reassessed in light of the new carbon pricing that now forms part of the TAG data book that was updated recently⁴.

3.2 Traffic reduction at the heart of RIS3

- 3.2.1 The Centre for Research into Energy Demand Solutions (CREDS)⁵, estimates that a 30-50% reduction in total car mileage is needed by 2030, relative to 2020, is required to enable the UK to meet its carbon targets. A Green Alliance report⁶ estimates that traffic reduction of 20 – 27% will be required if there is not a fast uptake of battery electric vehicles. Even if there is a fast uptake as contained in the CCC’s balanced pathway, it is worth noting that this scenario is also reliant on some demand management measures.
- 3.2.2 Research by Transport for Quality of Life⁷ also points to the same conclusion, saying that 20%-60% traffic reduction will be needed to meet climate targets, depending on the take up of electric vehicles. All the available research concludes that traffic reduction will inevitably be needed to meet our demanding climate targets, but this will be undermined with increases in capacity. Planning and building more roads to facilitate more traffic is driving us in the wrong direction.

³ [Roads Review](#) – Welsh Government, September 2021

⁴ [TAG data book](#) – DfT, 29 November, 2021

⁵ [The role of energy demand reduction in achieving net-zero in the UK](#) – Centre for Research into Energy Demand Solutions (CREDS), October 2021

⁶ [Not going the extra mile: driving less to tackle climate change](#) – Green Alliance, December 2021

⁷ [More than electric cars](#), Transport for Quality of Life, 2018

3.2.3 We disagree that the Transport Decarbonisation Plan (TDP) sets a “credible and ambitious pathway to deliver transport’s contribution to the five-year carbon budgets and meeting net zero by 2050”. The TDP is strong on rhetoric, but weak on detailed implementation plans. In its assessment of the Government’s Net Zero Strategy⁸ the Climate Change Committee, while welcoming the TDP, expressed concerns in a number of areas, relevant to new infrastructure projects such as new roads in RIS3:

“The Government has not yet put forward plans for a Net Zero Test, as we had recommended, to ensure that all policy and planning decisions are consistent with the path to Net Zero. Such a test is still needed to avoid locking in high-carbon developments.”

3.2.4 The CCC added:

*“There is less emphasis on consumer behaviour change than in the Committee’s scenarios. The Government does not address the role of diets or limiting the growth of aviation demand in reducing emissions, **while policies to reduce or reverse traffic growth are underdeveloped**. These options must be explored further to minimise delivery risks from an increased reliance on technology and to unlock wider co-benefits for improved health, reduced congestion and increased well-being.”*

3.2.5 National Highways’ Net Zero Plan is simply a document that outlines its plan to cut its own corporate emissions (through its operations and the construction process), so would have limited impact. It is not a plan to deal with national emissions from transport. Offsetting construction emissions does not eliminate those emissions which would not happen without roadbuilding, and they must be accounted for.

3.2.6 Already, in 2022 the incongruence of pledging to reduce road transport carbon emissions whilst progressing with a £24bn RIS2 roads programme is becoming increasingly stark. By 2025, when the RIS3 period starts, this contradiction will be utterly untenable. It is vital DfT changes direction now.

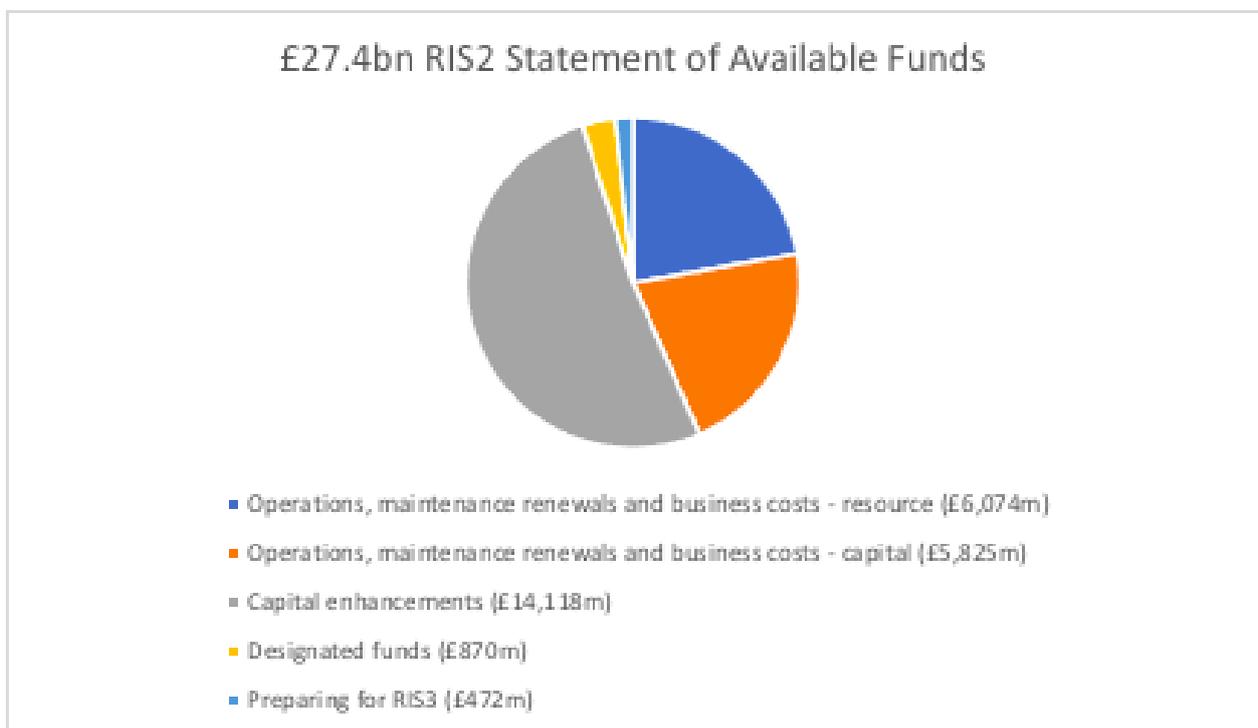
3.3 RIS3 must remove reliance on forecasted traffic growth

3.3.1 The Road Traffic Forecasts (RTF) have not been updated since 2018 and should not be used to determine RIS3 priorities. Rather than use forecasts of ever increasing traffic as an excuse for more road expansion, RIS3 needs to move away from predict and provide. Instead, it must adopt a different vision and validate approach to provide a strategy and pathway to **reduce** traffic and carbon emissions, improve public health and safety.

⁸ Page 4, Executive Summary, [Independent Assessment: The UK’s Net Zero Strategy](#) – CCC, October 2021

4 Resetting funding priorities

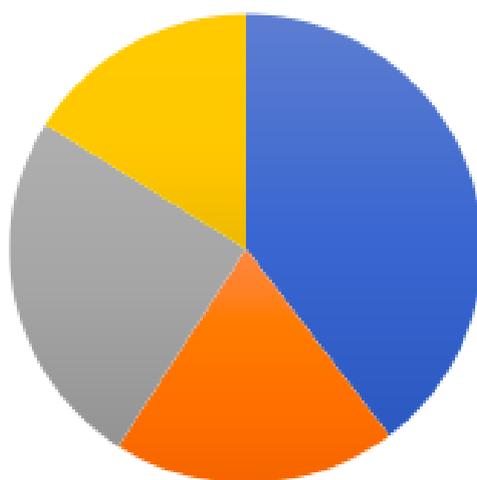
- 4.1 The Transport Focus study of Road users' priorities for improvement⁹ which is referred to in the policy, makes it very clear that the vast majority of drivers (65%) want investment to go towards maintenance, not new roadbuilding. New roads were a low priority for all road users (22-27%) when asked what would improve journey times. This was the same response for the 2015 Transport Focus research for developing RIS2¹⁰ where "improved quality of road surfaces on the SRN emerged from this research as the clear top priority for improvement for all drivers."
- 4.2 Despite this very clear response from Transport Focus, both RIS1 and RIS2 were completely dominated by capital enhancements, rather than maintenance and renewal.



⁹ [Road users' priorities for improvement](#) – Transport Focus, August 2021

¹⁰ [Road users' priorities for the Road Investment Strategy, 2020-25](#) – Transport Focus, 2017

£870m Designated Funds



■ Environment and Wellbeing £345m ■ Users and Communities £169m
■ Innovation and Modernisation £216m ■ Safety and Congestion £140m

- 4.3 In 2020, 51.6% of RIS2 funds went to capital enhancements (new roads), whilst only 21.3% went towards the capital costs of renewal and maintenance. Meanwhile just under 2% of RIS2 funds were allocated for environmental improvements, noise reduction measures and cycle infrastructure out of the designated funds (from the Environment and Wellbeing Fund and the Users and Communities Fund).
- 4.4 This same imbalance was reflected in RIS1¹¹ with over 50% spent on capital enhancements, and a small proportion spent on designated funds. This must not be allowed to happen again. The Designated Funds must not be a token gesture, or risk being seen as 'greenwash' to cover the harm caused by the new road building.
- 4.5 The DfT also needs to live up to promises made for RIS1 that historic problems caused by the SRN would be addressed through designated funds. Despite some improvements, many issues remain across the network. Work has been slow with little openness as to the process for putting forward schemes for consideration or how they will be prioritised. Opportunities to make improvements have also been wasted when maintenance and renewal operations have been carried out.
- 4.6 The overall RIS3 budget should be significantly less than RIS2 given the urgent need to invest in sustainable transport measures that deliver modal shift and carbon reduction. In this context, there is no need for new capital for expansion of the network, saving much needed funding for use elsewhere.

¹¹ [Road Investment Strategy: for the 2015/16 – 2019/20 Road Period](#) – DfT, March 2015

5 Proposed objectives

5.1 Improving safety for all

- 5.1.1 We believe that there needs to be a greater focus on improving safety on the network's most dangerous roads, especially for Non-Motorised Users (NMUs). This needs to be done in a way that rolls out rapid improvements without consuming vast resources through delivering large new roads with an increase in capacity. That not only undermines other objectives but significantly reduces the ability of National Highways to put itself on a Vision Zero pathway. Large new roads consume vast resources yet for the cost, deliver only modest improvements in safety, which often could be achieved far more cheaply in other ways.
- 5.1.2 Inclusion in RIS3 should be contingent on demonstrating a reduction in traffic and collisions without adding to capacity. Rather than rolling out more Smart Motorways in RIS3, which increase road capacity and carbon emissions, the emphasis should be on using technology and minor road layout changes to tackle safety on standard motorways and the more dangerous roads in the SRN.

5.2 Improved environmental outcomes

- 5.2.1 A step-change in improving environmental outcomes of RIS3 will only be achieved with a complete resetting of RIS3, as outlined above. The Road Investment Strategy can no longer be a strategy to facilitate ever-increasing traffic, but must be a plan to manage a rapid decline in traffic and road transport carbon emissions.
- 5.2.2 All schemes (including RIS2 schemes) should be assessed against their ability to reduce traffic and emissions. RIS3 should be consistent with the CCC recommendation that all investment decisions:

“should be contingent on analysis justifying how they contribute to the UK’s pathway to Net Zero. This analysis should demonstrate that the proposals would not lead to increases in overall emissions”.

- 5.2.3 Carbon emissions from the construction of new roads (embodied emissions) are not considered at this strategic level. Currently accounting responsibility for almost all of the embodied emissions rests with the Department for Business, Energy and Industrial Strategy (BEIS), rather than the Department for Transport (DfT). It is important that embodied carbon from construction of new roads is calculated and considered at this crucial developmental stage of preparing RIS3. This was a mistake made with RIS2 and should not be repeated with RIS3.

- 5.2.4 The ambition in the policy paper and within National Highways' Net Zero strategy to have 'near zero' construction practices should not simply be a displacement exercise, leading to elaborate offsetting schemes whilst continuing with business as usual. National Highways must be transparent and honest about schemes' carbon impacts in the critical fourth and fifth carbon budgets up to 2032.
- 5.2.5 The Environmental Fund part of the Designated Funds should be much larger than the tiny proportion in RIS2 (£345m out of £27.4bn, or 1.3%). We propose it should be at least 10% of RIS3. These funds should be used to mitigate the harm done by the existing SRN, for instance:
- Reducing community severance through creating safer crossings, especially for non-motorised users
 - Reducing air pollution in line with the new WHO guideline levels of PM2.5s and nitrogen dioxide
 - Creating more connections between habitats and to prevent roadkill, such as through tunnels or green bridges
 - Reducing pollution from the SRN, such as polluted water run off, and make sure it is properly treated before being discharged into the environment
 - Making parallel active travel routes safe and attractive
 - Prioritising public transport where it crosses the SRN but often gets delayed in traffic from the SRN

The amount of rhetoric about the environment in RIS3 must be matched by equivalent funding.

5.3 Network performance

5.3.1 In principle we welcome the proposal that in some places RIS3 should intervene to improve other transport networks that can support different ways of making local journeys off the SRN where they would enable modal shift. In particular, we strongly support measures that would assist the "Government's ambition to make walking and cycling the natural choice for short journeys". However, we would not support RIS3 being used to fund local road schemes.

5.3.2 We strongly support RIS3 funds being used for the renewal of road surfaces, to eliminate concrete and to reduce noise pollution. This is also supported by the analysis done by Transport Focus on road users' priorities.

5.4 Growing the economy

- 5.4.1 We recommend that DfT should consider using the RIS3 capital enhancements budget outside of the SRN, to the benefit of road users and communities. We believe one of the best uses of funds to relieve road congestion, and to benefit road users and communities, would be to invest in capital enhancements on the rail freight network. These rail freight capital enhancements are often cheaper, have better BCRs, and are more cost effective. They achieve multiple objectives of relieving road congestion, reducing carbon, air and noise pollution, and improving road safety.
- 5.4.2 The policy paper is correct to say that the causes of congestion are complex, and that there are “a number of solutions”. Planning for RIS3 must not default into developing a large road building programme, as happened with RIS2 and RIS1 in an attempt to build our way out of congestion.
- 5.4.3 The DfT must also utilise the evidence from the Standing Advisory Committee for Trunk Road Assessment (SACTRA) report, Transport and the Economy¹² which critiqued the assertion that road building is good for the local, regional or national economy, and decoupled traffic growth from economic growth.

5.5 Managing and planning the SRN for the future

- 5.5.1 We strongly support the emphasis on maintenance and renewal of the SRN in this objective for RIS3. As stated above, RIS3 should not be a strategy to facilitate ever-increasing traffic, but should be a plan that demonstrates how we rapidly decrease traffic and carbon emissions. It would be absurd to base RIS3 on predictions from the RTF from 2018, pre-pandemic and pre-net zero.
- 5.5.2 Our experience of “Project Speed” so far on the proposed A66 Northern Trans Pennine is that this has led to confused and inadequate public consultation. Rushing the consultations for large, complex and controversial schemes risks leading to further delays in the planning process. There are already considerable concerns with existing Nationally Significant Infrastructure Projects such as:
- when the Planning Inspectorate were set to refuse the DCO application for the Lower Thames Crossing due to inadequate consultation and an inadequate application, forcing National Highways to withdraw the application,
 - Examining Authorities recommending against approval of DCO applications as at A303 Stonehenge, A303 Sparkford Ilchester and likely others not yet published

¹² [Transport and the Economy](#) – SACTRA, 1999

- Preferred route announcements and consultations being legally challenged, as with the A27 Arundel Bypass.

5.5.3 All of these failures by National Highways have caused significantly more delays than may possibly have been saved by speeding the process up, unless it is the intention to remove all democratic involvement and accountability. We do not see why the public should be further disadvantaged by a system that is already heavily weighted against their involvement just to overcome the failures of applicants to consult properly and submit an adequate DCO application.

5.6 A technology-enabled network

5.6.1 An over reliance on technology on ‘Smart’ Motorways (SM) has not led to good outcomes, with the SM programme now paused whilst safety data is collected. The Transport Select Committee has identified concerns about the technology used on SMs, including stopped vehicle detection (SVD) radar technology in their report of November 2021¹³. The AA have also identified failings with the technology used on SMs in their evidence to the transport select committee, and called for an independent investigation into the effectiveness of SVD¹⁴. As the Lower Thames Crossing (LTC) is being built to “Smart Motorway standards” with no hard shoulder, the same vehicle restrictions and standards as motorways, and the same reliance on uncertain technology, we strongly recommend that all development of the LTC is paused while the safety data on SMs is collected.

5.6.2 We would strongly support the use of technology to reduce vehicle speeds on the SRN, as a policy measure to reduce carbon emissions, air pollution and the severity and frequency of collisions. It would also improve reliability and reduce costs, leading to economic benefits.

6 Strategic Studies

6.1 We note there is no published information about the three new strategic studies announced in RIS2 on the DfT or National Highways websites so it is difficult to comment. We strongly oppose any proposals to increase traffic growth on the M4 to Dorset Coast corridor, and wish to highlight that there is considerable opposition to routing traffic through the communities and countryside in this region. National Highways has conducted very little consultation with local communities in this region, with any contact being initiated by environmental groups. There is a strong suspicion

¹³ [Rollout and safety of smart motorways](#), Third Report of Session 2021-22 – Transport Select Committee, November 2021

¹⁴ [Written evidence submitted by the Automobile Association \(AA\)](#) to the Transport Select Committee (RSM0111), April 2021

that this study has only been conducted with those who support more roadbuilding. The pressure for these schemes comes from local authorities dominated by outdated thinking and grandiose ambitions with little or no consideration of the urgent need to reduce traffic and carbon emissions.

- 6.2 Regarding the role of the SRN in urban areas, the priority must be to address the huge negative impact of these roads on the surrounding communities. There is an urgent need to reduce air and noise pollution in line with the latest WHO guidelines for PM2.5s and nitrogen dioxide. Additionally, there needs to be more investment in sustainable transport measures within these urban areas to reduce their impact on the SRN, to improve reliability and economic performance of these key routes.

7 RIS3 pipeline schemes

- 7.1.1 All of the 32 RIS3 pipeline schemes identified in RIS2 should have their business cases assessed with the new carbon pricing and the latest construction costs to check whether these stack up financially. Then they also need to be assessed in line with the CCC recommendation that:

“Decisions on investment in roads should be contingent on analysis justifying how they contribute to the UK’s pathway to Net Zero. This analysis should demonstrate that the proposals would not lead to increases in overall emissions.”

- 7.1.2 This approach is even more important with any RIS2 schemes which are proposed to be carried over, as these proposals will most likely not have up to date costings in their business cases which consequently will be out of date and not suitable for assessment. The entire programme of road schemes which form part of RIS3, regardless of whether they have come from RIS2 or not, should be subject to SEA.

8 Sub-national transport bodies (STBs)

- 8.1 The policy paper states that the DfT will “make full use” of the evidence put together by the STBs. Transport Action Network has contributed to the development of the transport and decarbonisation policies of the STBs. Although many of them have excellent aspirations for promoting active travel and public transport, their desire for modal shift and decarbonisation is fundamentally undermined by accompanying long wishlists of road schemes.

9 Other comments

- 9.1 We would like to see greater independent verification of the many claims made about the benefits of building new roads. We have noticed, for example, for National Highways to claim credit for new active travel infrastructure when it is either just renewing worn assets or replacing the existing asset because it has changed the road layout (for non-active travel reasons). Neither is entirely honest and inflates the value of change National Highways is really delivering.
- 9.2 Additionally, it is questionable whether some interventions are beneficial at all. The propensity to create new crossings at grade for active travel, with and without signalised crossings, can lead to very awkward and long-winded movements for active travel users, who can often have multiple crossings to negotiate a junction. Counting new crossings in these circumstances as beneficial is highly questionable.
- 9.3 We would also like to see National Highways held to greater account for the negative impacts the SRN has on the surrounding road network. This can create pressure for better active travel infrastructure and bus priority measures to counter the negative impacts of more traffic, especially on feeder roads. There should be funding from RIS3 to address these issues.

2 February 2022

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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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