

Jesse Norman MP  
Parliamentary Under Secretary of State  
Department for Transport  
Great Minster House  
33 Horseferry Road  
London SW1P 4DR

7 February 2018

Dear Mr Norman,

### **Shaping the future of England's strategic roads: Strategic Road Network Initial Report**

We are a group of environmental, recreational and transport NGOs, with a common interest in securing a more sustainable future for the road network.

Our joint report, "Rising to the Challenge", sets out a shared green vision for the Road Investment Strategy and now we write in response to the SRN Initial Report which sets out Highways England's investment proposals and priorities for network improvements for 2020-25. While organisations will be submitting their own responses to the consultation, this letter responds in the context of our shared green vision for the Road Investment Strategy.

We propose three policy priorities:

- fix it first, prioritising improving the existing network, making it safer, greener and more accessible to all, rather than adding new capacity
- an integrated approach, connecting up with local and sustainable transport
- environmental leadership, protecting the landscape and biodiversity, tackling pollution and cutting CO2 emissions.

We welcome the references to our joint report and the aspiration to retain designated funds for the environment and for integration in RIS2.

We urge that these funds are retained and should as a minimum increase pro rata with the overall RIS2 funding allocation. We look to Highways England to maintain the commitment that the designated funds will not be used for 'business as usual' and incorporate the lessons, evidence and best practice accrued through these funds, into future practice.

#### **Fix it first**

We welcome the emphasis on safety, operations and maintenance, and agree that these should be a greater priority than new road capacity. The second Road Investment Strategy will have access to a significantly larger funding allocation than RIS1, thanks to the ring fencing of Vehicle Excise Duty from 2020. We believe that some of this money, raised from vehicle owners across the country, should be ring-fenced for maintenance, safety and environmental improvements on local A roads (the 'Major Road Network') in addition to the SRN.

We note that expressways will be a key feature of RIS2. We welcome the potential for improved provision for cyclists, walkers, equestrians and bus users on these corridors, in particular the implementation of the new design standards for cycling provision. It is vital that non-motorists are not cut off from safe and easy navigation of local routes by expressway plans.

We are also concerned that the proposals for expressway development could lead to 'motorways by stealth'. We do not believe it is appropriate to create any new motorways and that the RIS needs to give greater clarity about these proposals.

We are also gravely concerned about the proposal for new 'strategic orbital routes'. The green belts around towns and cities are a cherished asset, and should not be seen as a blank canvas for new roads. New ring roads will generate more traffic while permanently eroding the countryside. Investing in local transport and better public transport connectivity would deliver greater social and economic benefits while protecting the environment.

We also seek reassurances that the proposed 'key route upgrades' would uphold the strong presumption against any significant road widening or the building of new roads through National Parks, ancient woodlands and designated wildlife sites and that any investment in trunk roads should not lead to more long distance traffic through protected landscapes.

### **An integrated approach**

We welcome the retention of dedicated funding for walking, cycling, horse riding and public transport integration in the proposed 'connecting communities' fund. While some good progress has been made on cycling, better integration with bus operators and their passengers has been slow.

We look to Highways England to commit to additional enhancement for the network to enable integration with local road networks and with other networks such as the National Cycle Network, contributing to a national network of traffic-free safe routes.

More generally, where schemes affecting the SRN are being planned and delivered, high quality provision for people cycling, walking and horse riding should be incorporated from the outset and funded as an integral part of the scheme budget.

While reserving the right to comment on individual schemes as they arise, we broadly support the emphasis on last mile improvements and integration hubs, and welcome the potential for better integration with railway stations and other multi modal passenger and freight interchanges.

On bus and coach integration in particular, we feel there is much more to be done in RIS2, such as better signposting to Park & Ride or improving bus priority at key junctions.

### **Environmental leadership**

Meeting CO2 emissions targets will be a critical challenge for RIS2, something that is not given sufficient priority in the report. We believe that the RIS must have a clear carbon target, with carbon caps and potential carbon vetoes for individual road schemes, and should contribute to a balanced transport strategy that promotes healthy and sustainable travel. Highways England should carry out a Strategic Environmental Assessment of the cumulative impact of the RIS.

RIS2 should continue to invest in green retrofit of the existing network. We welcome the commitment to restore and enhance the soft estate and to manage lighting on the network more responsibly.

However, we are disappointed that the priorities for asset management (section 5.2) do not incorporate environmental features such as green infrastructure to provide greater connectivity for people and wildlife, noise reducing surfacing or sustainable drainage. This is a major missed opportunity and we urge that this be reconsidered.

We welcome greater support for electric vehicles but note the lack of specific targets for RIS2: this should be an urgent priority, with clear targets for delivering a comprehensive fast charging network.

In addition to electrification, the UK CCC notes that an overall cut of 5 per cent in vehicle miles is required: we are disappointed that despite the strong focus on technology in the report, there is little or no reference to demand management or potential to accommodate future road user pricing. The report still relies on the discredited “predict and provide” approach to road building.

We welcome the positive words on protecting the landscape and enhancing biodiversity, but note that there is still a lot to do. The Government’s recent commitment to embed an environmental net gain principal for development in its 25 Year plan for the environment should accelerate Highways England’s own aspirations for net gain for biodiversity.

These positive words require firm commitments, clear standards and targets and milestones for delivery. Highways England and its stakeholders would find it easier to assess and deliver this aspiration if it were to publish its two outstanding and overdue annual reports on its Biodiversity Action Plan.

RIS1 has delivered a few excellent projects, including green bridges and linear green networks: we look forward to these approaches becoming mainstream in RIS2.

We note the proposal to merge funding for air quality with environment in a new ‘wellbeing’ fund. We welcome the potential for greater co-ordination of projects and a streamlined funding process: however, this must not be at the cost of reduced funding for each strand.

We also welcome the proposals for a strengthened role for the Strategic Design Panel and look to Highways England to commit the necessary resources to deliver this.

We welcome the overall aspiration for RIS2 *“not just to minimise harm, but to run a network which works harmoniously with its surroundings to deliver an overall positive impact on the environment.”* This must be underpinned by clear, outcome-based performance targets.

We believe that by taking on board our recommendations, Highways England will be better able to deliver that aspiration in practice.

Yours sincerely,



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Campaign for Better Transport

Crispin Truman  
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Campaign to Protect Rural England



Fiona Howie  
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Dr Sue Young,  
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