

## NATIONAL HIGHWAYS CONSULTATION

### Connecting the Country – Feedback Form

- **Are you responding as an individual or organisation?**

An organisation

- **What is your organisation's name?**

**CPRE – The countryside charity**

- **If you are responding on behalf of an Organisation, please indicate which type of Organisation**

Environmental

- Do you feel that the Connecting the country: Our long-term strategic plan reflects your view of what the future of the Strategic Road Network should be?
  - **Options – not at all, undecided, somewhat, completely**

Not at all

- **Please explain why you gave this rating**

The foreword for National Highways' long term strategic plan opens with the words "*Roads will continue to be the most common mode of travel through to 2050 and beyond*" (page 2). This statement, whilst probably accurate, is not something to be proud of. It is a damning reflection on the way the UK has failed to invest sufficiently in heavy and light rail, in off-road networks that promote active travel – such as dedicated cycle routes, a high-quality walking environment in cities, towns and villages, in greenways between settlements, in short sea shipping and in technologies that reduces the need to travel. We are particularly disturbed by the announcement by the transport secretary in March that he was cutting, by 50%, promised investment in walking and cycling and the fact that the 'Connecting the country' strategy has not been rural-proofed.

As the countryside charity, CPRE is only too well aware of how poorly served many rural areas still are by digital technology and by bus services, how many rail services have been allowed to deteriorate, how the lack of investment in rural rail stations has facilitated their decline and of the poor progress that has been made in establishing networks of off-road greenways and on-road Quiet Lanes. In addition, we are very attuned to the fact that previously sustainable local communities have lost post offices, banks and other local services, factors which have resulted in rural dwellers having to drive distances they previously did not need to in order to obtain the services they require. All of these shortfalls have contributed to the rise in carbon footprints and in harmful greenhouse gas emissions and to poor air quality.

As for the matter of road-building, CPRE's view concurs with that of the government's climate advisers, the Climate Change Committee, who, in their 2023 Progress Report to Parliament published on June 28<sup>th</sup>, are recommending that the UK follows in the footsteps of the Welsh government which scrapped a big percentage of its major road building projects because of environmental concerns (<https://www.theccc.org.uk/publication/2023-progress-report-to-parliament/>).

In future National Highways should concentrate on maintenance and tackling accident hot spots. More investment should be devoted by the DfT to the alternatives mentioned above.

- National Highways is proposing to categorise the Strategic Road Network (SRN) and define the associated levels of services our customers can expect from them. Our current thinking, which requires further development, is that the categories would be national corridors, inter-regional routes and regional connections, depending on the role the SRN plays in each part of the country (see image and definitions on page 8). Do you feel that national corridors, inter-regional routes and regional connections are the correct categories for the Strategic Road Network?
  - **Options - not at all, undecided, somewhat, completely**



Undecided

- **Do you have any further comments on how we have categorised our network?**

The matter of categorising the SRN (or not) is a management issue. There would only be an impact on road users if categorisation affected the level of funding and/or maintenance. At the moment it is unclear whether this would be the case or not.

- Do the nine focus areas match your view of where we should focus the future of the Strategic Road Network?
  - *How much our customers will travel*
    - *Growth & levelling up*
    - *Car travel*
    - *Freight & logistics*
  - *How our customers will experience travel*
    - *Safety*
    - *Digital*
    - *Decarbonisation*
  - *How we will manage our network*
    - *Customer experience*
    - *Sustainable network development*
    - *Asset resilience*
  - **Options – yes, no, undecided**

No

- **Which focus area would you like to engage with? (Select all relevant focus areas)**

CPRE wishes to continue engaging with all the focus areas, even though we are critical of their shortcomings and of the fact that there are key omissions from the lists. The consultation document admits that “*there is clear evidence of climate change impacts*” (page 13) and yet climate change is not seen as a key focus. Nor is air quality. ‘Decarbonisation’ is merely viewed from the perspective of facilitating electric and alternative fuel vehicles and ‘safety’ does not cover ensuring that the air along and alongside the SRN is fit to breathe. What about securing the safety of human health?

The UK government has been pilloried for not complying with its commitments on climate change and air quality. Environmental lawyers Client Earth had to take the UK government to court to force it to publish an air quality plan. This should be a cause of some shame. Why is it not?

- **Growth & Levelling Up**

- **Do you feel the trends outlined for 'Growth and Levelling up' reflect your view of the future?** (Pages 17-20 of CTC)
  - Options - not at all, undecided, somewhat, completely

Not at all

- Please tell us why you gave this rating

The document admits that *“people are increasingly able to enjoy accessibility for services or employment through digital connectivity and not solely the physical mobility provided by transport systems”* and that *“the rise of the digital economy and new ways of working could affect the strength of the relationship”* (ie. between the demand for road travel and economic growth). The prediction is that demand for the network will continue to increase but the rate at which it grows “could” decrease. (Page 18). This reluctant nod in the direction of massive societal changes is not an accurate reflection of what is happening. Not only are 44% of workers either working from home or hybrid working post Covid (<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/characteristicsofhomeworkersgreatbritain/september2022tojanuary2023>) but mortgage rate rises, fuel and food price rises and other inflationary impacts are all going to be reflected in a decreased demand for travel for some time to come. Quite apart from the growing realisation amongst the population that everyone is going to have to play their part in tackling climate change.

As far as the Levelling Up White Paper and Bill are concerned, CPRE has expressed strong opinions to DLUHC about both, most particularly in relation to proposals to weaken the planning system. We also cannot support the generalised, sweeping statements in the consultation document about the ‘need’ for improved physical connections between cities, town and communities (page 20).

- **Do you feel the vision outlined for 'Growth and Levelling up' reflects your view of the future?** (Page 52)
  - Options - not at all, undecided, somewhat, completely

Not at all

- Please tell us why you gave this rating

The pledges are vague and unquantified. There is a commitment (again) to ‘categorise’ the network, although it is unclear what this is intended to achieve, and there is a promise to *“be increasingly active in influencing plans for development, supporting government plans for growth and addressing network constraints”*. The latter strongly implies a ‘business as usual’ approach to road building, regardless of governmental commitments to address the climate emergency and of impacts on air quality. National Highways cannot continue to play down the need for drastic action on these two major issues which ought to be overlying and influencing everything they do. Instead, they barely receive a mention in passing and appear to have no impact whatsoever on the long term plans that are the subject of consultation.

- **Do you feel our delivery plan outlined for 'Growth and Levelling up' reflects your view of the future?** (Page 56)
  - Options - not at all, undecided, somewhat, completely

Not at all

- Please tell us why you gave this rating

The *'targeted approach'* to *'enhancing the network'* promised includes progressing all the schemes committed in the road investment strategies RIS 1 and RIS 2 – a very substantial list. Interestingly, there is one stipulation and this is that support will be “subject to the continued robustness of scheme business cases” – and there is a particular mention of the A122 Lower Thames Crossing which is described as *“an essential component in the UK’s future transport infrastructure”*. However, we would point out here – as we did in response to the consultation on *'Shaping the Future of England’s Roads'* – that the cost benefit ratio of this scheme has fallen (from an originally-estimated 3.1) to 1.22. In other words, it is now fast approaching the critical '1' mark below which schemes are not deemed to be viable. No doubt, the recently announced two-year delay to the start of the scheme will result in an even worse COBA due to the effect of inflation (currently running at 8%) and that is not even taking into consideration the inevitable cost overruns on a scheme as huge as this one. Also, we note that Thurrock Council challenges National Highways estimate that the Lower Thames Crossing would relieve the Dartford Crossing of 20% of traffic. Thurrock maintain that the figure would only be 4% and points out that no provision has been made for vehicles to switch from one crossing to the other easily when there is a major hold up on one or the other.

- **Car travel**

- **Do you feel the trends outlined for 'Car travel' reflect your view of the future?** (Pages 21-23)
  - Options - not at all, undecided, somewhat, completely

Not at all

- Please tell us why you gave this rating

The text on page 21 makes the assumption that, as the population of the UK grows, more people will live in the urban and sub-urban fringes and in 'garden communities' and that this will create more car movements into and out of urban centres. We would make two rebuttal points in response to this.

Our first point is that the pattern of work has changed forever. Currently, 16% of the working population are based permanently at home and 28% work partially from home (ie. the total of 44% either working from home or hybrid working referred to in response to an earlier question in this consultation).

Our second point is to explain that CPRE champions the regeneration of urban centres and the utilisation of brownfield sites as the only sustainable way forward. CPRE is a member of the Smart Growth Coalition (<https://smartgrowthuk.org/>) which advocates compact and accessible urban communities and which opposes urban sprawl and car dependency. It seeks traditional ways of planning towns based around local services, ease of walking and cycling and good public transport. It is important to recognise that land is a finite resource.

We cannot continue to use it in the careless and lavish way we have in the past, allowing ever more development (including new roads) to sprawl across ever more greenfields.

The text on page 22 discusses the “*shift to electric vehicles*”. In response to this we would point, again, to the annual report by the Climate Change Committee published in June which highlighted the fact that emissions from plug-in hybrid cars are five times higher than originally thought. This being the case, they have recommended that the ban on hybrid cars should be brought forward in order to help meet climate change targets.

- **Do you feel the vision outlined for 'Car travel' reflects your view of the future?** (Page 52)
  - Options - not at all, undecided, somewhat, completely

Not at all

- Please tell us why you gave this rating

The succinct and clever phrasing here appears to be holding out promises of ‘modal integration’, ‘seamless multi-modal travel’ and ‘harnessing digital technology’, but there is no explanation as to how these will be achieved and some wording bears further scrutiny. For instance, the sub-heading in this section promises “*fast and reliable journeys*”, although speed is never a priority of road users when they are surveyed. There is a determination to “*stimulate economic growth in a sustainable way*”. How do National Highways envisage doing this? And there is an interesting new twist on ‘predict and provide’, i.e. a reference to a “*decide and provide approach*”. What is the difference, we would ask?

- **Do you feel our delivery plan outlined for 'Car travel' reflects your view of the future?** (Page 57)
  - Options - not at all, undecided, somewhat, completely

Not at all

- Please tell us why you gave this rating

Whilst this page is scattered with much commendable phrasing in relation to modal shift, integration, seamless end-to-end journeys, etc., all these fine promises are negated by the words at the very beginning, under ‘Network optimisation’, i.e. “*In addition to our existing pipeline of larger scale enhancements ...*”. These are the words that speak volumes.

It is worth reminding National Highways here of the important research carried out by Transport for Quality of Life in 2020 into RIS 2. ‘*The carbon impact of the national roads programme*’ showed that the £27 bn. road investment strategy threatened the UK’s climate change commitments. They calculated that the roads programme would add 20 million tonnes of carbon dioxide to UK emissions from the Strategic Road Network between then and 2032 when the need was to cut them by 167 million tonnes to meet climate targets (<https://www.transportforqualityoflife.com/u/files/The%20carbon%20impact%20of%20the%20national%20roads%20programme%20FINAL.pdf>).

Transport for Quality of Life described the scale of carbon reduction that was needed as “*extremely challenging*” and advised the Department for Transport to set binding carbon budgets that complied with the Paris Climate Agreement for all parts of the transport sector, including Highways England. Highways England being the predecessor to National Highways.

Not only has this not happened, but National Highways are simply pressing on with their road building programme regardless.

- **Freight & Logistics**

- **Do you feel the trends outlined for 'Freight & logistics' reflect your view of the future?**  
(Pages 24-27)
  - Options - not at all, undecided, somewhat, completely

Not at all

- Please tell us why you gave this rating

Whilst it is welcome to see a reference to short sea shipping in this section, the potential impacts of it and of transferring more freight onto rail are dismissed as “likely to be modest” and there is no discussion about freight logistic innovations such as those which won the 2023 Freight Innovation Fund (<https://www.gov.uk/government/news/uk-smes-secure-funding-to-transform-future-of-freight>), nor any recognition in this section of the health and environmental impacts of the carcinogenic fine particles that tyres emit. The latter being a particular problem with heavier vehicles. (There is, however, a reference to tyre and brake emissions in the ‘Sustainable Development’ section of the consultation report). (<https://www.gov.uk/government/news/tyre-particles-are-contaminating-our-rivers-and-ocean-study-says>, <https://www.imperial.ac.uk/news/243333/prioritise-tackling-toxic-emissions-from-tyres/>, [https://www.telegraph.co.uk/money/consumer-affairs/heavy-electric-cars-toxic-tyre-particles-petrol-vehicles/?trk=public\\_post\\_comment-text](https://www.telegraph.co.uk/money/consumer-affairs/heavy-electric-cars-toxic-tyre-particles-petrol-vehicles/?trk=public_post_comment-text)).

Four years ago, in July 2019, a DEFRA air quality expert group, AQEG, predicted that particulate pollution from brakes, tyres and road wear would account for 10% of national emissions of PM 2.5 by 2030 and called for standardised methods of measuring emissions and for actions to combat this threat (<https://deframedia.blog.gov.uk/2019/07/11/air-pollution-from-tyres-and-brakes/>). Their predictions, recommendations and call to action should have been treated with some urgency, but they have not been. Most governmental transport-related reports make no reference to this issue. This is deeply concerning.

- **Do you feel the vision outlined for 'Freight & logistics' reflects your view of the future?**  
(Page 52)
  - Options - not at all, undecided, somewhat, completely

Not at all

- Please tell us why you gave this rating

The sub-heading here on page 52 says it all: “*Our network will provide unimpeded access to domestic and world markets, driving national competitiveness*”. It constitutes a blanket endorsement for unfettered growth in the freight and logistics industry, propped up by a predict and provide approach to traffic growth and all in the name of perceived economic benefits. There are no qualifications relating to impacts on people, their health, the environment or climate change. Simply a ‘Let’s go for it’ mentality. Also, we would question why the only moderating factor that is mentioned – working with partners on greater integration – is only promised for “*urban locations*”? What is the explanation, we would ask, for excluding non urban areas from work on greater consolidation?

- **Do you feel our delivery plan outlined for 'Freight & logistics' reflects your view of the future?** (Page 58)
  - Options - not at all, undecided, somewhat, completely

Not at all

- Please tell us why you gave this rating

Here again, whilst there are placatory words about exploring 'modal shift', 'consolidation' and even 'traffic reduction' (although, the latter, only in cities), none of these promises are quantified and the over-arching commitments are to be "*informed by our route strategies*" (which "*maximise the connectivity of our cities, ports and airports*").

- **Safety**

- **Do you feel the trends outlined for 'Safety' reflect your view of the future?** (Pages 29-31)
  - Options - not at all, undecided, somewhat, completely

Not at all

- Please tell us why you gave this rating

The safety performance figures illustrated in the graph and the accompanying text do not tell the whole story. According to the analysis by 'Local Transport Today' of the DfT's latest provisional road safety statistics, there has been a significant worsening in the rates of serious casualties by distance since the UK emerged from the Covid 19 pandemic (<https://www.gov.uk/government/statistics/reported-road-casualties-great-britain-provisional-results-2022>). This includes a 23% increase in car and taxi occupant deaths per billion vehicle miles (LTT 870, June 6<sup>th</sup> 2023, page 11). And it comes on top of the cancellation of the roll-out of the smart motorway programme in April this year over cost and safety concerns. Although the total number of fatalities on Britain's motorways fell in 2019 from the previous year (to 105), the number of fatalities on smart motorways rose to 14 in 2019 from 11 in 2018. It is interesting that, nowhere in the section, are smart motorways mentioned. They should be and there should be a commitment that, where they already exist, there will be refuges every 500m.

- **Do you feel the vision outlined for 'Safety' reflects your view of the future?** (Page 53)
  - Options - not at all, undecided, somewhat, completely

Somewhat

- Please tell us why you gave this rating

The resolution to reduce the level of harm to travellers on the SRN network to zero is only seen in terms of targeting the physical movements of travellers. The statement is made that what is required is "*a holistic safe systems approach*" (page 53). We agree with this. But we would argue that an holistic approach should include consideration of safety in respect of the population's respiratory systems. What are the impacts of air pollution on travellers on the SRN and people living alongside it? How 'safe' are they – especially for people who have health vulnerabilities?

- **Do you feel our delivery plan outlined for 'Safety' reflects your view of the future?** (Page 59)



- Options - not at all, undecided, somewhat, completely

Somewhat

- Please tell us why you gave this rating

The commitments in relation to speeds are too weak and woolly and, here again, there is no recognition of the safety impacts of poor air quality. There should be and there should be identified measures to deal with it.

In December 2020 there was a landmark finding by a coroner who pronounced that air pollution contributed to the death of nine-year-old Ella Adoo-Kissi-Debrah who lived near the South Circular Road in Lewisham, part of London's strategic road network. Since then, there has been the 'Prevention of Future Deaths' report and the Clean Air (Human Rights) Bill (informally dubbed 'Ella's Law') has been making its way through parliament, establishing everyone's right to breathe clean air. No-one else should suffer negative health impacts, let alone death, as a result of poor spatial planning and the down-playing the importance of air quality. National Highways should have a programme for reducing air pollution over the lifetime of their plan.

- **Digital**

- **Do you feel the trends outlined for 'Digital' reflect your view of the future?** (Pages 32-35)

- Options - not at all, undecided, somewhat, completely

Somewhat

- Please tell us why you gave this rating

The ability to access and share real time information as a result of good digital connectivity is acknowledged as being a crucial element of National Highways' plans. However, it needs to be recognised that the roll-out of fast digital services in many rural areas has been poor or non-existent and there are still many 'not-spots' and unconnected or very poorly served remote settlements. National Highways could, if they wanted to, make a financial contribution to ensure that digital connectivity was improved around those parts of their network which pass through more remote areas. This would be a very valuable civic service.

- **Do you feel the vision outlined for 'Digital' reflects your view of the future?** (Page 53)

- Options - not at all, undecided, somewhat, completely

Somewhat

- Please tell us why you gave this rating

CPRE's concern is that the promises made by National Highways in relation to providing digital infrastructure do not mention landscape. Where masts would impinge on important landscapes, there should be a commitment to seek alternatives such as satellites or the undergrounding of cables.

- **Do you feel our delivery plan outlined for 'Digital' reflects your view of the future?** (Page 60)

- Options - not at all, undecided, somewhat, completely

Somewhat



- Please tell us why you gave this rating

In all the prophecies about how 'digital' will dominate every aspect of National Highways' working, there is not one mention of back-up systems. In the event of failures, there needs to be plans in place setting out how National Highways would function in the event of a loss of part or all of its digital system.

- **Decarbonisation**

- **Do you feel the trends outlined for 'Decarbonisation' reflect your view of the future?**  
(Pages 36-38)

- Options - not at all, undecided, somewhat, completely

Not at all

- Please tell us why you gave this rating

See below – composite answer below to all three decarbonisation questions

- **Do you feel the vision outlined for 'Decarbonisation' reflects your view of the future?**  
(Page 53)

- Options - not at all, undecided, somewhat, completely

Not at all

- Please tell us why you gave this rating

See below – composite answer below to all three decarbonisation questions

- **Do you feel our delivery plan outlined for 'Decarbonisation' reflects your view of the future?** (Page 61)

- Options - not at all, undecided, somewhat, completely

Not at all

- Please tell us why you gave this rating

See below – composite answer below to all three decarbonisation questions

**Composite answer to all three decarbonisation questions**

Research by Professor Greg Marsden of the Institute for Transport Studies at the University of Leeds has revealed that the Department for Transport has significantly reduced its target to achieve decarbonised road transport under the government's recently revised Net Zero Plans. Here we reproduce his blog, posted on May 16<sup>th</sup> 2023 on his DecarboN8 website:

<https://decarbon8.org.uk/reverse-gear-the-reality-and-implications-of-national-transport-emission-reduction-policies/#more-2472>

***Reverse gear: The reality and implications of national transport emission reduction policies***

*"New analysis has shown that the Department for Transport has quietly rolled back its ambition to introduce cleaner, more efficient road travel.*

*Transport is the UK's biggest source of carbon emissions and the Transport Decarbonisation Plan published in 2021 set out a bold and detailed journey to achieve net-zero by 2050. For road travel, it built on policies to phase out fossil-fuelled vehicles and was followed by*

strategies that supported a switch from car use to efficient, lower carbon models like public transport, walking and cycling.

In 2023, the government published a new plan, the Carbon Budget Delivery Plan, which set out a different carbon reduction pathway for transport. Analysis of this new plan shows that any aspirations to reduce travel demand have been removed, along with a downgrading of the contribution of a switch to lower carbon modes of transport. In fact, the vast majority of potential ambition proposed less than two years earlier has been lost.

The remaining policy focus is on the rapid take up of electric vehicles, but at a much slower pace than originally planned. Even if this was realised, it would be insufficient to achieve interim carbon reduction targets and it will make a fair transition for all road users more difficult to deliver. Without the inclusion of traffic reduction policies alongside the move to electric vehicles, net zero will be very difficult to achieve on the necessary timeframes.

Professor Greg Marsden, author of the report, says that ‘There seems to be little appetite to depart from business as usual planning for transport. This is why transport has been the slowest to decarbonise sector and is the biggest emitter in the economy. The ambition set out by the Department for Transport less than two years ago seems to have largely gone. It is not yet too late to shift to lower carbon transport futures which deliver emission savings faster and better and fairer transport systems for users, but the window for doing this is closing’.

The full report is here: <https://www.creds.ac.uk/publications/reverse-gear-the-reality-and-implications-of-national-transport-emission-reduction-policies/>.

In the report, a joint effort between the DecarboN8 project and the Centre for Research into Energy Demand Solutions (CREDS), Professor Marsden concludes that the net effect of the Carbon Budget Delivery Plan is that 72% of the more ambitious policy outcomes projected in the 2021 Transport Decarbonisation Plan are not seen to be necessary. On the other hand, he points out that many local authorities, combined authorities and sub national transport bodies have set transport emission reduction targets for zero emissions – well in advance of what national government now deems necessary. And he queries, where is the sense in National Highways planning for growth in the National Road Traffic Projections whilst the local authorities whose areas its network runs through plan for less? A very salient question.

- **Customer Experience**

- **Do you feel the trends outlined for 'Customer Experience' reflect your view of the future?** (Pages 40-42)

- Options - not at all, undecided, somewhat, completely

Somewhat

- Please tell us why you gave this rating

The customer survey results are, by and large, accurately reported here. What road users (and travellers in general) always ask for when they are surveyed is reliable journey times. This is sometimes mis-reported as them asking for faster journey times. In fact, that never ranks as a top priority. The travelling public simply want to be able to plan their days around known journey times. As is explained here, this will be greatly assisted in future through better digital connectivity.

Oddly, this section on 'customer experience' highlights the need for better rest facilities for freight drivers, but says nothing about improving the 'rest' facilities for other drivers. The standard of motorway service facilities varies enormously. Much has been written about this in the past. Is there more that could be done to raise the standards of the poorer ones?

The final part of this section focuses on the charging infrastructure for electric vehicles. It admits that *"To encourage drivers to make and enjoy the switch to electric vehicles from petrol or diesel vehicles, the charging experience must be equal to or better than refuelling a petrol or diesel vehicle"* (page 42). Unfortunately, this aspiration has a long way to go.

'Auto Express' reported in its May 4<sup>th</sup> 2023 edition 'Charging network blamed as EV demand slowed in April'. The slip in new car sales from 16.2% to 15.4% has apparently caused the Society of Motor Manufacturers and Traders to downgrade its market share predictions for new electric car sales. The forecast for 2023 has now been adjusted to 18.4% from 19.7%, while the 2024 projection has been lowered from 23.3% to 22.6%. While these percentage shifts may appear small, any tail-off in demand for EVs is potentially worrying in the light of the government's zero emissions mandate coming into effect in 2024. This requires car makers to ensure that at least 22% of car sales are BEVs, rising incrementally to 80% by 2030 – and the DfT's projections for EVs are based on this.

- **Do you feel the vision outlined for 'Customer Experience' reflects your view of the future?** (Page 54)
  - Options - not at all, undecided, somewhat, completely

Somewhat

- Please tell us why you gave this rating

This section does in fact flag up the need for 'attractive rest areas' for all users of the SRN and acknowledges the need to improve them. However, it does not explain how it intends to do this.

- **Do you feel our delivery plan outlined for 'Customer Experience' reflects your view of the future?** (Page 62)
  - Options - not at all, undecided, somewhat, completely

Somewhat

- Please tell us why you gave this rating

Here again, there is the welcome promise to improve the quality of motorway services but, once more, it is left to speculation as to how this is going to happen.

We also note the commitment to *"work closely with third parties such as wayfinding services to improve the availability and quality of our current information channels, while also developing new channels"*. This is also welcome because better information means that drivers make better decisions.

We would use this opportunity to re-iterate a point we have made previously. That is the need for improved route navigation systems which differentiate between what routes are feasible for ordinary cars and what are suitable for HGVs. Too many rural dwellers have to regularly contend with HGVs that are stuck on unsuitable roads they should not have been directed to in the first place.

- **Sustainable network development**

- **Do you feel the trends outlined for 'Sustainable network development' reflect your view of the future?** (Pages 43-46)

- Options - not at all, undecided, somewhat, completely

Somewhat

- Please tell us why you gave this rating

CPRE are pleased to note the recognition by National Highways that biodiversity is in severe decline and their resolve to make more use of recycled and low-carbon construction materials. CPRE also commends the recognition by National Highways in this section that most PM 2.5 and PM10 emissions attributed to road transport are generated by brake and tyre wear. But, what we cannot condone is its weak reaction to this state of affairs which is, basically, restricted to a hope that low emission tyres will evolve. The fact of the matter is that, despite endorsing the government's 'State of Nature' targets and making warm noises about achieving biodiversity net gain, National Highways intends to carry on delivering new highway capacity when the answer to the problems that exist is to reduce the need to travel and the amount of road travel that actually takes place. Planting some trees is not going to be the answer. A whole different ethos is needed.

- **Do you feel the vision outlined for 'Sustainable network development' reflects your view of the future?** (Page 54)

- Options - not at all, undecided, somewhat, completely

Not at all

- Please tell us why you gave this rating

The fine words in this section ring hollow in view of National Highways' declared intention elsewhere in this document to "deliver the existing pipeline of improvements", i.e.. all the schemes committed in RIS 1 and RIS 2. This is not CPRE's 'view of the future'.

- **Do you feel our delivery plan outlined for 'Sustainable network development' reflects your view of the future?** (Page 63)

- Options - not at all, undecided, somewhat, completely

Not at all

- Please tell us why you gave this rating

CPRE cannot equate declarations in this section about promoting sustainable development and achieving no net loss in biodiversity with declarations elsewhere in this and in other consultation documents which make it quite clear that the priority for National Highways is the economy. Sustainable development, according to DEFRA, is supposed to be an even-handed approach to the economy, to social issues and to the environment. The environment encompasses, amongst other things, climate change, air quality and landscapes. The determination by National Highways to press on with a huge road-building programme cannot be endorsed. It is totally at odds with commitments made by the UK government in respect of climate change and with the emerging 'Ella's Law' on air quality. And this is not only CPRE's opinion. It is the judgement of the Climate Change Committee.

## **Asset Resilience**

- **Do you feel the trends outlined for 'Asset Resilience' reflect your view of the future?**  
(Pages 47-50)

- Options - not at all, undecided, somewhat, completely

Somewhat

- Please tell us why you gave this rating

National Highways recognise the need to maintain their assets to a very high level but, sadly, do not intend to concentrate their efforts on this. Instead, they see this happening as well as their road-building programme. This will invariably mean that the replenishment programme will take much longer than would otherwise be the case if, for instance, road building were curtailed as recommended by the Climate Change Committee in their 2023 Progress Report.

- **Do you feel the vision outlined for 'Asset Resilience' reflects your view of the future?**  
(Page 54)

- Options - not at all, undecided, somewhat, completely

Somewhat

- Please tell us why you gave this rating

The key promise here is to provide real time information about roadworks so that users of the SRN can make timely decisions about alternative routes, modes and departure times. This is a good thing. According to an analysis by the University of Leeds, electric cars put 2.24 times more stress on road surfaces than their petrol equivalent. This being likely to remain the case for at least the next decade or so, it reinforces the need for National Highways (and local highway authorities) to focus their efforts on maintenance for the foreseeable future and to drop their road building programmes.

- **Do you feel our delivery plan outlined for 'Asset Resilience' reflects your view of the future?** (Page 64)

- Options - not at all, undecided, somewhat, completely

Completely

- Please tell us why you gave this rating

The resilience programme, as set out on page 64, is impressive – but it will not be cheap. If it is to happen in the way described, then it must be the focus of National Highways' attention.

- Any further comments on Connecting the Country?

The Climate Change Committee, in its 2023 annual report published in June, came to the conclusion that the government's 2030 goal for cutting harmful emissions is further away than it was a year ago. This is largely because the government now expects road transport emissions to be about 50% higher than previous estimates. Also, it is refusing to consider a situation where emissions are cut by reducing the number of vehicles on the roads.

The committee looked at plans for cutting emissions and concluded that only a quarter of the emissions savings needed were covered by "credible plans". The rest had policies with

“some risks”, “significant risks” or “insufficient plans”. Policies to decarbonise heavy industry, buildings and agriculture were also highlighted by the committee as weak points.

The very bold stance taken by the Welsh government in halting or amending road schemes because they were incompatible with ‘net zero’ was held up as best practice. In total, Wales halted or decided to review 31 of its 48 road schemes. The committee’s opinion was that the UK should consider doing a similar thorough review. CPRE endorses that advice.