Submission by CPRE, the countryside charity), TO:
CALL FOR EVIDENCE ON GOVERNMENT'S MAJOR ROADS/MOTORWAYS INVESTMENT PLAN

CPRE has chosen to present its evidence by answering four of the eight questions posed: 1, 5, 7 and 8.

Q1: How has the RS2 enhancement portfolio been managed to date?

i. CPRE fully recognises that this is an inquiry into the management of resources on a Department for Transport (DfT) programme that is required under the Infrastructure Act of 2015 and that it emanates from a critical report about the second Road Investment Strategy (RIS2) by the National Audit Office (NAO) [1]. That said, we would contend that it is not possible to answer this question on management without also questioning the soundness of the programme itself and why it is not subject to ongoing reassessment in view of the enormous sums of public money involved and changing objectives.

ii. As far as management is concerned, it is all too obvious from the NAO report, from observations on the ground and from reports in the public domain that RIS2 is not making good progress, especially on larger projects.

iii. We can see a logic in the DfT having detailed strategies for different modes, i.e. to allow for longer term planning and provide greater certainty to supply chains. CPRE would argue that these should be part of an over-arching fully comprehensive national all-mode transport strategy. This encompasses climate change, and influences and contributes to necessary changes in complementary policies of other departments. Additionally, there would be a shift in focus to reducing travel demand and switching, and promoting, active travel and public transport in rural areas. There is also an undeniable case for tighter financial controls, particularly for large infrastructure schemes of the type being investigated here, because they are notoriously difficult to plan and cost. Overruns on costings and delivery times are commonplace, long term environmental and social impacts are often greater than anticipated and any economic benefits are difficult to measure.

iv. In view of the scale of the RIS2 budget (£27.4 billion), there ought to be ongoing/ annual re-appraisals which not only re-examine the COBA (cost and benefit analysis) of each scheme using the most appropriate methodology but which incorporate new regulations and evidence on climate change, biodiversity and inflation. These should be considered along with lessons learnt from POPE studies (post-opening projects evaluation for major schemes). These include traffic, safety, environmental and economic evaluations, carried out by National Highways on schemes one-year and five years after completion [2].

Q5: What lessons from RIS2 need to be incorporated into RIS3 to ensure it is achievable and delivers on policy objectives?

i. What lessons are being learnt from the POPE studies? (See CPRE's response to question 1). It is not apparent that lessons are. Without the willingness to learn from what has gone before, how will National Highways improve its performance?

ii. In March 2017, Transport for Quality of Life produced an assessment of the impacts of major road projects, using the POPE evaluation process that had been put in place by the then Highways Agency 20 years before [3]. This was commissioned by CPRE and, as far as we are

[1] https://www.nao.org.uk/reports/progress-with-the-second-road-investment-strategy/
[2] https://nationalhighways.co.uk/media/exypgk11/pope-methodology-note-jan-2022.pdf
[3] http://www.transportforqualityoflife.com/u/files/170320%20The%20Impact%20of%20Road%20Projects%20in%20England%20FINAL1.pdf

aware, it was the last time that an independent assessment was carried out of the POPE process.

iii. The authors' study of 13 randomly-selected schemes confirmed that road schemes generate traffic. More than half of the major road schemes for which POPE was then available (49 out of 86) affected a site or area that had local or national environmental significance, with many schemes having multiple impacts. Four case studies suggested that the impacts on the landscape and biodiversity were long-lasting and also that road building was associated with a highly car dependent pattern of land development. 15 POPE road schemes were examined from the point of view of road safety. Eight showed a reduction in collisions and seven showed an increase over the period of five years.

iv. Some six years on from that Transport for Quality of Life report, we would suggest that it is time for another independent study to be commissioned, which will feed into an appraisal of RIS2 and planning for RIS3, and we would also strongly recommend that POPE studies should be carried out 10 years after major schemes are inaugurated to see if the longer-term projections were realistic.

v. There is a big question around the accuracy and relevance of road traffic projections which do not consider the need to reduce travel to meet the government's climate change commitments. In December 2022 the DfT published its latest National Road Traffic Projections using the National Transport Model [4]. The core scenario used in this model predicts a 22% increase in traffic between 2025 and 2060. That said, the report itself admits that projecting travel demand over the long term is inherently uncertain and, as the editorial director of 'Local Transport Today', Peter Stonham, pointed out in his article in LTT's December 20th 2022 edition, *"previous forecasts have consistently over-estimated actual growth outturns"*.

vi. The Transport Committee needs to ask itself whether all of the 69 'road enhancement projects' in RIS2 should be in there. The schemes appear to be a rag-bag of projects which do not appear to come from any rigorous assessment of national priorities. The National Policy Statement, National Networks [5], which lies behind the road strategy process, was written in 2014 without any serious regard to climate change. The promised update must come forward before RIS3 is drawn up and it must take full account of climate change and its long-term impacts.

vii. The Transport Committee also need to question whether the spending balance in RIS2 is the right one to carry forward to RIS3. Currently, only half the budget is for new schemes. There is a recognition that in future more will need to be spent on maintenance and renewal. Road repair costs have spiralled since Russia's invasion of Ukraine because the UK imports much of its bitumen. Costs of this basic road building material, which now has to be sourced elsewhere than Europe, has risen due to supply chain issues - and that is only one aspect. A strong argument could be mounted for not building new road capacity when there are major problems in maintaining what we have. There have been some notable emergency closures, for example the A52 Clifton Bridge in Nottingham[6], In this respect, we would refer to the Transport Focus research which highlighted that road users (ie. of major roads) most value improved quality road surfaces, safer design and road upkeep [7]. Maintenance of the current

[4] https://www.gov.uk/government/publications/national-road-traffic-projections
[5] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/387222/npsnn-print.pdf
[6] https://nationalhighways.co.uk/our-roads/east-midlands/a52-clifton-bridge-repair-scheme/
[7] https://www.transportfocus.org.uk/publication/check-how-road-user-priorities-for-improvement-vary-by-type-of-user-and-journey/

road and highways notably road safety infrastructure should take precedent over building new roads.

viii. It needs to be recognised that the problems lie much deeper than just how RIS2 is being managed.

Q7: Whether the Government's roads investment programme aligns with other policy priorities such as decarbonisation, levelling up, productivity and growth

Decarbonisation

i. CPRE's policies on aspects of Transport [8] highlights the fact that transport policy at the national and local level is contradictory, often at odds with international and national pledges on climate change that the UK has signed up to in addition to the Climate Change Act of 2008. In doing so, we endorse the findings of the Committee on Climate Change which stated in its 2021 report: *"This sector is now significantly off-track from the cost-effective path of the committee's fifth carbon budget assessment"* [9].

ii. Similar criticisms have been made by prominent figures in the transport industry. For instance, at Landor's 'Local Transport Summit' in December Keith Mitchell, Director at Stantec and Jonny Rigall, Director at Aether, were both very questioning of how the government is addressing decarbonisation – and in particular the practicalities of the switch to electric propulsion as the main pathway to net zero. Keith Mitchell, a former chair of the Transport Planning Society, drew attention to the Paris Climate Change Agreement of December 2015. The signature countries, including the UK, committed to reducing greenhouse gas emissions by 68% by 2030 (compared to 1990) [10] However, since then, after a dip in emissions during the Covid lockdowns, they have rebounded and continue to grow [11].

iii. We note that the Office for National Statistics is due to release its latest climate change insights into the economy and transport on February 10th 2023. These, we believe, will show how transport demand has been springing back since the lockdowns (and impacting climate change). Unfortunately, the deadline for this call for evidence is February 6th. We trust that the Transport Committee will consider, when it is reviewing the evidence collected, the findings from this latest ONS survey.

iv. We contend that the UK's decarbonisation strategy lacks credibility, relying as it does on carbon capture, electric cars and technological fixes. That is not to decry these facets, but the fact of the matter is that carbon capture technology has a long way to go and the others will not be adequate [12].

v. Despite the proposed cessation of sales of petrol and diesel cars and vans by 2030 and despite the UK's 'Net Zero Strategy' announced in 2021 [13], the government itself only expects 55-60% of new cars to be electric by 2030 [14]. Any impacts on CO_2 emissions would not be felt until well into the next decade as older vehicles with internal combustion engines are gradually scrapped.

[8] https://www.cpre.org.uk/wp-content/uploads/2019/11/2472_policy_guidance_notes_transport_1.pdf
[9] https://www.theccc.org.uk/publication/2021-progress-report-to-parliament/
[10] https://www.gov.uk/government/news/uk-sets-ambitious-new-climate-target-ahead-of-un-summit
[11] https://www.iea.org/topics/transport
[12] https://www.tandfonline.com/doi/full/10.1080/14693062.2020.1728209
[13] https://www.gov.uk/government/publications/net-zero-strategy
[14] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005301/transitioning-to-zero-emission-cars-vans-2035-delivery-plan.pdf

vi. It is also apparent that it is going to be some years before there are anywhere near an adequate number of electric vehicle (EV) charging points. Roll-out plans for public charging points by local authorities (LAs) are very uneven and reveal a north-south divide. A freedom of information request by the Liberal Democrats has revealed that nearly two thirds of EV charging points planned by LAs this year are in London [15]. A lack of reliable charging points around the country is already affecting sales of EVs and there are also yet-to-be-resolved issues around the sourcing of rare minerals needed for the batteries and the recycling and disposing of them.

vii. However, to re-focus specifically on the Road Investment Strategy and its (lack of) alignment with climate change policies, we would like to draw attention to a very important piece of analytical work that was conducted into the carbon outputs that could be expected from RIS2.

viii. In 2020, Transport for Quality of Life published 'The carbon impact of the national road programme', its assessment of RIS2 [16]. The report shows the roads programme will add 20 million tonnes of CO_2 to the strategic road network in the 12 years up to 2032, whereas those emissions need to be cut by 167 million tonnes in order to meet the climate targets. It is only too clear that the RIS programme does not only not align with the declared policy of decarbonisation, but works actively against it.

Commented [J1]: Is this from the construction or use or both?

ix. If the government were factoring climate change into its thinking in respect of transport, it should be focusing on the transport hierarchy devised by the Energy Saving Trust last year [17]. This places digital communication at the top, followed by walking and wheeling (the term used for wheelchair users) and then cycling. Fourth is public and shared transport, followed by electric vehicles and car sharing in electric vehicles and then internal combustion engine vehicles and car sharing in them. At the bottom of the hierarchy is air travel, the most polluting of all transport.

x. The key need, as we stated in response to question 1, is for a fully comprehensive national transport strategy that covers all modes and that factors in climate change. But, given that the DfT is determined to produce a RIS3, we would argue there is a strong case for subjecting it to a Strategic Environmental Assessment. We would also like to endorse the suggestion made by the Transport Planning Society (TPS) in their response to 'Planning ahead for the Strategic Road Network', published late in 2021 in which the plans to develop a RIS3 were set out [18] . The TPS's recommendation was:

    a. *"that a separate objective related solely to carbon should be considered by the DfT, rather than the topic merged (as it is currently) with the 'Improved Environmental Outcomes' objective. As a minimum, the RIS3 appraisal process should ensure that every individual scheme and the overall programme is tested against the government's Transport Decarbonisation Plan objectives [19] .*

[15] https://www.thetimes.co.uk/article/2-in-3-new-charging-points-for-electric-cars-will-be-in-london-50lkmwvl7
[16] https://www.transportforqualityoflife.com/u/files/The%20carbon%20impact%20of%20the%20national%20roads%20programme%20FINAL.pdf
[17] https://energysavingtrust.org.uk/an-introduction-to-the-sustainable-travel-hierarchy/
[18] https://tps.org.uk/public/downloads/jqgPY/TPS%20RIS3%20response.pdf
[19] https://www.gov.uk/government/publications/transport-decarbonisation-plan

Levelling up, productivity and growth

i. The aspirations of 'levelling up', (still not properly defined), 'productivity' and 'growth' are somewhat intertwined and therefore we address them together.

ii. To begin with, we would like to highlight a key, if now somewhat historical, finding of the Standing Advisory Committee on Trunk Road Assessment (SACTRA). Their seminal report 'Transport and the Economy', published in 1999, found (after an exhaustive review) a *"strong theoretical expectation"* that transport investment could boost economic growth, but that direct evidence was *"weak and contested"*. They concluded that, in a developed economy such as that which exists in the UK, there is no automatic connection between transport investment and economic growth.

iii. SACTRA's report also emphasised that roads work in two ways. Just as they can bring visitors and commuters to an area, they can enable people living in one area to commute out to work – and this occurs particularly in peripheral areas [20]. Sadly, with the passage of time, these findings have been gradually forgotten about – but they are no less valid.

iv. In 2021 the government set out a vision "to level up and boost connectivity across the UK through improved transport infrastructure" [21], followed by the publication of a 'Union connectivity review' by Sir Peter Hendy [22], which recommended the establishment of a multi-modal transport network (UKNET) to improve transport connectivity.

v. The Levelling Up White Paper of February 2022 maintained that there is a need to improve transport infrastructure in areas where transport is less extensive and to aim for public transport provision closer to the London level across the country. Also, last year, the DfT published a 'Transport Business Cases: Levelling Up Toolkit' [23] and invited bids for transport projects from the Levelling Up Fund [24] .

vi. All of these actions demonstrate that the government is making assumptions about economic growth it should not be making, that it is not factoring climate change or air quality into its thinking and that it is ignoring the importance of reducing the need to travel. It may be helpful if governmental responsibilities for climate change and air quality were not divided between different government departments. Currently, the climate and carbon budgets come under the Department for Business, Energy and Industrial Strategy (BEIS). Air quality, on the other hand, comes under the Department for the Environment, Food and Rural Affairs (DEFRA). How much joint working is there between the two? Can this be improved? Are BEIS and DEFRA asked to comment on the Road Investment Strategy? The Committee may wish to address these issues.

vii. In addition, it would appear to be the case that the DfT it is not factoring into its thinking the vast growth in home working and the effects this has had on commuter movements. Between October/December 2019 and January/March 2022, home working more than doubled in the UK, increasing by 108% (up 5.2 million) from 14.5% (4.7 million) to 30.6% (9.9 million) [25]. This dramatic social change seems to point to focusing funding on providing

[20] https://www.ffue.org/wp-content/uploads/2016/08/SACTRA_Full-report.pdf
[21] https://www.gov.uk/government/news/move-to-boost-transport-connections-across-the-whole-of-the-uk
[22] https://www.gov.uk/government/collections/union-connectivity-review
[23] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1054072/transport-business-cases-levelling-up-toolkit.pdf
[24] https://www.gov.uk/government/publications/levelling-up-fund-round-2-transport-business-case-checklist
[25] https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/homeworkingintheukregionalpatterns/2019to2022

homes with office/study spaces in them rather than on 'levelling up' by building more roads and encouraging people to travel more.

viii. The question that has been posed is – does the government's road investment strategy align with other policy priorities such as decarbonisation, levelling up, productivity and growth? We would argue that it 'over-aligns' with a desire to achieve economic growth in the misguided belief that building more highway space will automatically achieve that end. In doing so, it fails to achieve any balance with the other two 'legs' of the sustainability stool, ie. social and environmental issues. They are the losers in this approach – and by a substantial amount. Not to mention the health losers who, due to poor air quality prompted by transport emissions, suffer from respiratory diseases.

ix. The government needs to re-balance its thinking on transport, overlay it with climate change considerations and give the same weight to environmental capital and social issues as to potential economic benefits. This should include adopting the Climate Change Committee's recommendation that all schemes must demonstrate they will not increase emissions. It should drop its reliance on traffic forecasts and focus on sustainable modes, road safety and road maintenance improvements in line with the public's expressed preference. Transport Focus, in its submission to government on the third RIS in October 2022, emphasised that road users' priorities were: improved road surface quality, safer design, up-keep of the network and better road works management [26].

Q8 How RIS3 should take account of technological developments, and evidence on ways of increasing capacity on the Strategic Road Network (such as smart motorways and potential alternatives to them

i. There is little sign that consideration has been given to the potential of alternatives which would reduce the need for additional capacity on the strategic road network. Most traffic which uses the strategic road network also uses the local road network and that is also constrained. Previous and current policies have not considered the limitations of both networks or the impossibility and undesirability of seeking to increase their capacity to cater for the growth proposed. The proliferation of development in close proximity to motorway junctions, usually in locations where there is unlikely to be any alternative other than by road vehicles, is a major cause of congestion.

ii. It is clear that the logistics industry in particular sees the road network as merely part of a conveyor facilitating a just-in-time process. Having regard to the difficulty of replacing diesel engines in HGVs, and their impact on the local and wider environment, consideration should be given to alternative ways of moving freight, possibly using small containers via a dedicated electrically powered automatic network. This would also reflect the limited ability of the current rail network to serve the disparate freight movements involved and the costs and other problems involved in trying to remedy those.

iii. It is vital that the spatial planning process and other government policies take full account of the limitations of the national and local road networks and ensure that they contribute to a reduction in traffic.

CPRE, February 2023

[26] https://d3cez36w5wymxj.cloudfront.net/wp-content/uploads/2022/10/10164826/Putting-road-users-at-the-heart-of-RIS3.pdf