

Chartered Institution of Highways & Transportation response to the Department for Transport consultation: 'Shaping the future of England's strategic roads (RIS2)

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CIHT is a charity, learned society and membership body with over 14,000 members spread across 12 UK regions and four international groups. We represent and qualify professionals who plan, design, build, manage and operate transport and infrastructure networks. Part of our vision is to demonstrate transport infrastructure's contribution to a prosperous economy and a healthy and inclusive society. Our values are to be Professional, Inclusive, Collaborative and Progressive.

CIHT welcomes the progress that has been made in the creation of Highways England (HE) and the government's approach to funding the Strategic Roads Network (SRN) since its original proposals in 2013. It has formed the basis of a significant change in the way we manage and operate our highways network.

CIHT welcomes the opportunity to respond to this consultation and will continue to work collaboratively with the Department for Transport (DfT), HE and all the other organisations who provide world class infrastructure and services for those who use and rely on our highway networks.

It is worth noting CIHT's original response to the DfT in October 2013 when it was consulting about proposed changes to the management of the SRN. The following key points made then (highlighted below) still serve a useful check against the proposals set out in this consultation and we refer to them as appropriate in our response to the questions.

Standards and expertise: *The standard of highway expertise in the United Kingdom is very high and is recognised worldwide. Our networks are amongst the safest in the world and our professional standards are highly regarded. The United Kingdom has contributed significantly to the development of highways as an increasingly more efficient sector of industry.*

HE remains the focal point for the development of expertise and standards in the highways sector. CIHT would urge the government to ensure that the continuing development of that expertise is not at the expense of standards and expertise across the rest of the highways network. Recent developments to the standards used in highways are noted but how they are to be used by the rest of the organisations involved needs to be clearly addressed by government in the response to this consultation.

Sector needs certainty - *Certainty, and continuity of investment over a sustained period is important if overall improvements to the network are to be delivered effectively and efficiently. Government needs to provide the commitment needed by the supply chain side of the sector to invest in resource and capability to deliver the investment envisaged.*

CIHT is clear that this is still of fundamental importance as we move into RP2. There has been overall improvement, however more must be done in terms of clear programme management during RP2. The introduction of the roads fund is welcome but what this will enable HE to deliver needs to be clearly set out.

Clear strategy required - *CIHT has continued to call for a transportation strategy that sets a clear framework of requirements over a sustained period for all elements of our transportation networks. This strategy (or strategies) should include the strategic and local road networks, rail, aviation and ports and set out how those networks integrate with one another.*

The government has provided more clarity about what the SRN needs to achieve but CIHT believes that there is still more clarity required on how different government departments will contribute to the overall development of the highway network, given its importance to a wide range of policy areas, including different transport modes. In addition, how the network interacts with networks in other nations of the UK, where transport is devolved needs to be stated clearly.

Recognition of the degree of change required – CIHT welcomes the progress made by HE and would like to see a continued focus given to a clear appreciation of customer requirements and an expanded commercial capability, informed by other sectors. There is also a need to ensure continued innovation and agility in decision making.

HE has made significant, welcome changes but further development will be required as wider demographic and technological changes affect use of the network. Government should also consider how the relationship between itself, HE, Office for Rail and Road and Transport Focus develops as we move into RP2. As an Institution, CIHT is committed to valuing and respecting the diversity of individuals and launched a Diversity and Inclusion Charter. CIHT would like to see HE continue to support measures to increasing diversity and inclusion in the sector.

Local roads are a key part of the network - Government should recognise that the success of an improved strategic network in meeting customer needs cannot be met without the local road network being also considered as part of a holistic solution that customers require.

CIHT is clear that continuing to consider the local and strategic networks separately in the way that they are funded and considered at a government level will lead to an underperforming network and potentially negate the value of investment in the SRN. The introduction of a Major Roads Network (MRN) gives the opportunity for government to properly consider how the entire highway network can best meet the needs of everybody who uses and depends on it. That should be clearly recognised in the response to this consultation.

Question 1

Do you think Highways England's proposals will deliver what users of the SRN want? If not, what could be done differently?

1. CIHT agree that the current proposals will offer significant benefits to users and that the focus on levels of service to the customer is key to ensuring that the sector is making correct investment decisions.
2. HE needs to undertake further work to ensure that customers can use their networks effectively as misunderstandings around smart motorways has been an issue.
3. CIHT would observe that the users of the SRN and equally those who do not use the SRN, but depend on it, are very diverse and vary in the reasons, frequency and purpose when they rely the network. This means that the costs and benefits of road infrastructure investment could affect users disproportionately. This should be considered when planning investment strategies, as the national priorities of home building and regional growth that HE is responding to cannot be addressed in isolation from one other.
4. CIHT would encourage HE to focus on a strategic vision of the future to ensure that the SRN will continue to deliver for all users over the next 30 years in the context of large scale technological change.

Question 2

Do you think Highways England's proposals will deliver what businesses want? If not, what could be done differently?

5. CIHT welcomes the HE focus on reliability and consistency as beneficial to businesses whom can operate with assurance about the network. However, the 2017-18 World Economic Forum global competitiveness study [ranked the UK 27th](#)¹ in its road condition, below many of its peers. This ranking is based on views from business leaders around the world and demonstrates improvements must be made to both the SRN and local road network to deliver what businesses want. RIS2 goes some way to addressing this, but the local road network still requires attention.
6. CIHT notes that the investment strategy does not address the impact of Britain leaving the European Union, which could have a major impact on the network and RIS2. Given that in 2016 ["98% of goods lifted by UK HGVs were to and from the EU15"](#) there will need to be advance planning to avoid critical failures.
7. Operation Stack, the most comparable recent event, had significant impact on businesses and tourism in the South-East region and similar circumstances could be seen again. HE has not begun consultation on a permanent replacement to Operation Stack and [does not plan to apply for a planning application until 2019](#).
8. Business will look to HE to deliver a consistency of service for them to export and import goods, this will require collaboration between HE, DfT and DExEU to ensure minimal impact is felt at major freight entry sites. This could form a part of HE strategic economic ambitions to *"provide reliable and resilient access to international gateways"* and further as the initial plan highlights *"The SRN's performance impacts on production costs, as well as the competitiveness and attractiveness of England as a place to invest in"*.
9. HE cannot deliver RIS2 alone, the success will depend on how it integrates with suppliers, manufactures and contractors. Learning from CIHT members experiences of RIS1, suggests that the time profile of new schemes should be considered from the outset to avoid undue demand on skills and equipment, and to minimise the risk of re-profiling later in the road period.
10. CIHT members have also observed that smaller contractors and suppliers continue not to be fully engaged in process of innovation within HE. Given their often-specialised function the importance of their roles should be highlighted and recognition should be given for their role in delivering new ideas and efficiencies throughout RP2.
11. CIHT observes that bus and coach companies, are key business users of the SRN and their needs must inform future investment in maintenance and enhancements, but there is currently no investment priority aimed at encouraging their usage. They are major users of roads and provide cheap and efficient transport to many groups that do not have private motor vehicles.
12. There is a note made of the nine road users priorities identified by Transport focus, which include "Meeting the needs of bus and coach operators and their passengers" but little analysis as to how those needs will inform future investment. The importance of the overall urban environment to passenger journeys is outlined in the CIHT report [Buses in Urban Developments](#) (Tim Pharoah, 2018).

¹ World Economic Forum, The Global Competitiveness Report 2017–2018
<https://www.weforum.org/reports/the-global-competitiveness-report-2017-2018>

Question 3

Do you think that Highways England's proposals meet the needs of people affected by the presence of the SRN? If not, what could be done differently?

13. CIHT welcomes HE's identifying that one of its key challenges is "*Making roads work for everyone: Providing for the needs of all customers – not just those who are driving on our roads*" (page 46) and recognises that identifying the nature of the SRN's impact on the environment, health, growth and development is a difficult task.
14. CIHT has consistently advocated a holistic approach which considers people, place and vehicles when designing and constructing new developments. The balance of movement between the three is an aspect that CIHT highlighted in its Shared Space review [Creating better streets: Inclusive and accessible places](#) (2018) and is something that can have significant impact on localities.
15. Key needs of people affected by the presence of the SRN that are not sufficiently discussed in the Initial Report are health outcomes and public transport. There is a risk that when the SRN encounters communities it can cause poorer health outcomes, including through noise pollution, air pollution, litter and area degradation, and road traffic collisions. HE should outline how it will monitor and address the health outcomes of its schemes and consider working with public health bodies to estimate the costs of ill health and build those into its assessment impacts for new schemes.
16. HE highlights the £100 million Growth and Housing Fund's role in unlocking stalled developments but how those developments will interact the transport network is key to long term sustainability. Designing for public transport requires thought from the early stages and CIHT suggests that HE considers regularly sharing skills in Transport Planning with local authorities as it has done previously in major developments.
17. The development of expressways may also impact public transport networks if they discourage slow and stopping vehicles such as buses from using those routes. Care must be taken that alternate routes are equal in quality as not to discourage public transport and cycling.
18. CIHT encourages HE to make the updated regional traffic models described in *Highways England's analytical methods to inform proposals for the second Road Period (2020-2025)* publicly available to inform the decision making of sub-national transport bodies, local government and other organisations. This will help achieve common understanding and cooperation in producing schemes.
19. CIHT welcomes the regional traffic models discussing improving labour access to support socio-economic goals, but observes that this must include providing access to high quality public transport. Article 17 of the National Policy Planning Framework says that new developments should "*actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.*" HE schemes should encourage that goal and not generate land usage change that creates dependency on private motor vehicles.

Question 4

Do you agree with Highways England's proposals for:

Four categories of road and the development of Expressways (initial report sections 4.4.3 and 5.3.6)

20. CIHT welcomes the development and roll out of smart motorways but encourages HE to examine further how to increase users understanding of the information provided due to the lack of understanding many users have towards variable message signalling, 'hard shoulder running', and other interventions.
21. CIHT broadly welcomes changing some A roads to expressways and recognises the ambitions of HE to deliver greater capacity, resilience and reliability.
22. CIHT observes that expressways are not simple upgrades to existing roads, they have the potential to change the relationship between users and the highway and affect patterns of travel and employment, particularly as some proposed routes pass through denser communities than existing motorways. The consequences of this on localities must be understood before committing to specific schemes.
23. The initial report provides example diagrams of the level of service an expressway should provide to vehicles (page 59), however the accompanying dedicated provision for pedestrians, cyclists and public transport are not shown. If HE is committed to a SRN "Making Roads work for everyone" (page 87) non-motor vehicles and buses must also be able to expect a consistent level of service. The development of expressways may also impact public transport if they discourage slow and stopping vehicles such as buses from using those routes.
24. Designated funds are useful and provide the opportunity to think innovatively about multiple modes of transport, but it is not enough to rely on specific projects without considering the impacts of other major schemes.
25. CIHT has concerns that if expressways are not developed on a route basis they may encourage inappropriate speeds due to their resemblance to motorways, this may result in a worse safety outcome overall.
26. CIHT further welcomes high standards being applied to All Purpose Trunk Roads, and encourages that, particularly through urban areas, they should be planned in conjunction with the local highway and planning authorities to ensure an integrated approach to travel demand management.
27. For all levels of highway CIHT would encourage moving away from cost-benefit analysis to a real options analysis which would allow for better adaptability to unanticipated change. This has been termed a 'decide and provide' model versus the current patterns of 'predict and provide'. More detailed information can be found in our [CIHT futures report](#).

Operational priorities (initial report section 5.1)

28. CIHT welcomes the operational priorities laid out in section 5.1 but would highlight that as HE develops over RIS2 we would welcome spending plans focused around TOTEX rather than CAPEX and OPEX as it is the overall cost of delivering a service that is key. Moving to a performance system that considers the whole life costs of assets will be key to ensuring the road network is financially sustainable in future years.
29. OPEX in RIS is currently delivered on an annual basis, which can be considered an artificial distinction. Including OPEX in multi-year funding periods will allow more efficient usage of resource.

Infrastructure priorities (initial report section 5.2)

30. No comment

Enhancement priorities (initial report section 5.3)

31. CIHT welcomes the collaboration between HE and the Sub-National Transport Bodies (STBs) such as England's Economic Heartland and Transport for the North in developing strategic studies. The success of enhancement schemes will depend on integration into wider economic and social planning. There are questions over influence, decision making and division of responsibility between DfT, HE and the STBs, especially if there are financial contributions and requirements from combined authorities.
32. CIHT observes that the reprofiling of several schemes has a large cost implication for RIS2, and would encourage HE to publish more information about the consequences of these. A few of those schemes such as the Lower Thames Crossing are significant enough to have consequences for spending on other schemes.
33. CIHT suggests that lessons must be learnt from RIS1 (and prior) especially regarding engagement with the supply chain and sharing knowledge as to how schemes will be prioritised.

A local priorities fund (initial report section 5.3.8)

34. CIHT observes that in section 5.3.8 this is referred to as a "*congestion relief fund*" and that it mentions "*smaller schemes, to address local safety, capacity and journey time*" it should be clear that these are community focused and are not solely focused on private motorists. The needs of residents must be considered within the overall planning context for an area.
35. There is the opportunity to ensure that RIS2 supports the uptake of use of public transport (see CIHT publication, Buses in Urban Developments, 2018), and use of walking and cycling.
36. There is the question of governance in terms of who takes decisions for the Major Road Network. The role and remit of the SRN, MRN and STBs needs to be clear

Future studies (initial report section 5.3.11)

37. CIHT welcomes a commitment to further research in those areas, and indicates that our recent work on CIHT FUTURES may be of use when it comes to addressing further questions.

Designated funds (initial report section 5.4)

38. CIHT welcomes attention paid by HE to these key areas and highlights that the aims of these funds should not be siloed, and should be built into every maintenance and enhancement project.
39. The initial plan suggests a "*model, where environmental groups or non-motorised user groups could suggest proposals or bid for funding would benefit everyone and could work toward a better integrated SRN*" and CIHT welcomes engagement with community groups, however this does not mean the principles behind the designated funds can be ignored in other projects. Further, bidding for funding can be an expensive process for smaller organisations and that must be taken into account.

Performance measures and targets (initial report section 6.3)

40. CIHT acknowledges the discussion in section 6.3 *Measuring our performance* and accepts that the most appropriate performance metrics are those which are measurable and within the control of HE. CIHT looks forward to commenting on future performance measures as they are developed and government and HE should provide the opportunity for comment at the earliest opportunity.
41. It is noted that the targets around safety appear not to be being achieved and that this should be acknowledged and explained. There is a need for safety to be paramount across all road networks.

Question 5

Are there any other proposals in the initial report that you do not agree with? If so, which ones and what could be done differently?

42. No comment

Question 6

Do you agree with Highways England's assessment of the future needs of the SRN (initial report section 4.4)

43. CIHT observes that Section 4.4. is a detailed analysis of the future needs of the SRN but it may not be appropriate as a basis for developing future action. CIHT has questioned the current decision-making pathways used in UK transport in our recent CIHT Futures report. It discussed the use of 'real options analysis' replacing cost-benefit analysis, this leads to a model which lets decisions makers focus on active policy making that shapes the areas we live in. This has been referred to as moving from 'predict and provide' to 'decide and provide'

Question 7

How far does the initial report meet the Governments aims for RIS2 (economy, network capability, safety, integration and environment – described in paragraph 2.3)?

44. CIHT observes that the initial report is strongly focused but it misses opportunities to pull various strands together. The respective outcomes of public transport, demand management, walking and cycling within a corridor and planning outcomes are affected by each of the five strands.

45. CIHT welcomes HE intentions to integrate SRN planning with HS2 and encourages work to integrate the SRN with other forms of public transport to support the Governments aims.

46. CIHT observes that sufficient attention must be paid by HE to induced demand, propensity to travel, creating increased pressure on the local roads network and impact on urban environments. Without focus on exposing uncertainty in transport planning methodology there may be unintended consequences of schemes that undermine those goals in the medium and long term.

47. There is also limited description of the prioritisation of these goals, as there will be trade-offs between housing development and environmental goals that will need to be considered.

Question 8

Do you think there should be any change in the roads included in the SRN (described in paragraph 1.3)?

48. CIHT will be responding in detail to the consultation on the proposed Major Roads Network which may contain the need to reconsider the SRN in that wider consideration of classification of highways and proposes that any change should best be considered when that consultation is complete.

Question 9

Is there anything else we need to consider when making decisions about investment in the SRN? If so, what other factors do you want considered? Please provide links to any published information that you consider relevant.

49. In addition, in relation to the analytical approach summarised in Chapter 6 and set out in more detail in the strategy document accompanying this consultation

50. CIHT would like to see metrics developed to quantify the following:

- How lack of investment in the local roads network may negate investment in the strategic roads network
- Socio-economic benefits of road maintenance
- Road condition quality comparator of UK against Europe and WEF countries
- Network performance of RIS1 interventions to inform RIS2 investment.
- Health considerations should be considered as per PHE suggestions (Health high roads, etc)
- Public transport orientated developments (See Buses in Urban Development)

Question 10

Does the analytical approach taken have the right balance between ambition, robustness, and proportionality? If not, what do you suggest we do differently?

51. CIHT would encourage evaluation of RIS1 to be published based upon Post-opening project analysis among other factors such as asset performance, road condition and public perception. That learning should inform and adjust RIS2 investment.

CIHT welcomes this detailed consultation by Highways England and we would welcome clarity of timetabling for future work to enable CIHT to contribute in detail on future proposals.