

Office of Road and Rail

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EEH Business Unit  
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County Hall  
Walton Street  
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Date: 28/01/2022

Dear Sir/Madam,

**Office of Road and Rail (ORR) consultation on the Road Investment Strategy 3 process**

As the Sub-national Transport Body (STB) for the England's Economic Heartland (EEH) region we welcome the opportunity to participate in ORR's consultation on the Road Investment Strategy 3 (RIS3) process consultation.

STBs play a key role in setting the ambitions for strategic transport connectivity in regions across England and have growing profile within central and local government for the significant role we play. EEH covers the area from Swindon and Oxfordshire in the west to Cambridgeshire in the east, and Hertfordshire up to Northamptonshire.

In February 2021 EEH published our [transport strategy](#) outlining the connectivity priorities for the region, underpinned by 4 principles;

- Achieving net zero carbon emissions from transport no later than 2050, with an ambition to reach this by 2040
- Improving quality of life and wellbeing through a safe and inclusive transport system accessible to all which emphasises sustainable and active travel
- Supporting the regional economy by connecting people and businesses to markets and opportunities
- Ensuring the Heartland works for the UK by enabling the efficient movement of people and goods through the region and to/from international gateways, in a way which lessens its environmental impact

EEH welcomes the opportunity for early consultation on ORR's proposals for the process for assessing the costs and deliverability of the RIS3 enhancement portfolio and plans for operations, maintenance and renewals. EEH's focus is on delivering a user-centred transport system in our region, bringing better outcomes for all users. This is a focus that is shared with ORR in its role as Monitor.

The Strategic Road Network (SRN) plays an important role in the transport system in the Heartland region, supporting economic growth and connecting people and places. It provides

key links between our region and the rest of the UK and provides a vital role in supporting the freight and logistics sector.

Transparency and a clear process for assessing developing, assessing, and delivering the RIS and increased engagement is key to ensuring partner 'buy in' for Road Investment Strategies. This response takes each consultation question in turn giving views and, where relevant, examples to illustrate a need for clear process to ultimately deliver priorities identified through the RIS process.

We understand the role of the ORR is not to set investment priorities, responses are provided on that basis. We will continue to engage with National Highways in the development of RIS3.

Yours sincerely,



Naomi Green  
Interim Director, England's Economic Heartland

Annex 1: Consultation response (please note question b has not feature in this response, we do not feel that a response is required from STBs to this question)

### **Key issues and risks that could impact on National Highways' performance and efficiency during road period 3 and how we should address them**

RIS3 is being developed in a more uncertain world and policy context. The impact of COVID on transport is yet to be fully understood on a long-term basis, leading to the need to plan for future uncertainty.

The Government's legal target for net zero carbon emissions also leads to uncertainty for National Highways, who will have to plan and meet the target. EEH's transport strategy sets out a clear ambition for net zero ahead for 2040 and is working to develop pathways to meet the decarbonisation ambitions. The transport decarbonisation plan represents a step towards achieving net zero, with strong ambitions and targets, around the fleet transition to electric vehicles (EVs) and innovation in mobility. However, this alone will not be enough to reach net zero.

EEH, working with our partners, have developed a series of 'uncertain futures', which consider which drivers of change are uncertain and how important they will be on the future of transport in the EEH region. The outputs are a series of futures which the region could face and is being utilised to assess resilience of our future connectivity priorities. We would encourage the requirement for a consistent approach for National Highways working with STBs, many of whom have been developing narratives for alternative futures for their regions, to help consider assessment of the resilience of RIS interventions. More information on EEH's alternative futures can be found [here](#). The DfT's Uncertainty Toolkit should also provide some clarity about how to plan to future unknowns.

Across the sector the level of ambition and expectation amongst users and wider communities when it comes to planning for net zero is growing, with the legal target by 2050. EEH has set an ambition to meet net zero by 2040. EEH's own transport strategy outlines key policies in relation to decarbonisation of the transport system:

- In identifying future investment requirements we will prioritise those which contribute to a reduction in car journeys in line with the recommendations delivered by the UK Climate Assembly: to facilitate a reduction in the number of private car journeys by a minimum of 5% per decade (of total traffic flow compared with 2019).
- We will support and plan for the decarbonisation of the road fleet, working with the private sector, the energy sector, local authorities and Highways England to ensure the infrastructure required to support a zero-emission fleet (including buses, public transport and freight) is available
- In identifying future investment requirements, we will prioritise proposals on the basis of value for money, their contribution towards achieving net zero carbon targets, and their contribution to wider sustainability, environmental net gains and health outcomes

STBs collectively are collaborating on their work to develop pathways to net zero. The pathway to net zero cannot wait for future RIS periods and the ORR needs to ensure that National Highways actively responds to changing policy directions and priorities during individual RIS periods. RIS3 should be viewed as an opportunity to plan and assess schemes differently to meet the decarbonisation challenge and provides the opportunity to think more widely about the whole transport system.

We would support the ORR, through assessment or test, to ensure that RIS3 is compliant with the UK's legal requirement for net zero greenhouse gas emissions by 2050 and by default with the DfT's Transport Decarbonisation Plan.



The complexity of large-scale infrastructure projects remains challenging. Development and delivery take several years, leading to potential for increased costs and pressures on programme timelines. Sector skills in planning, managing construction costs will be important to ensure the programme is deliverable.

Certainty in delivery will also be important for the supply chain, and contractors who will ultimately deliver the work. In other sectors we have seen the effects of supply chain uncertainty. To ensure smooth delivery of RIS3, while balancing the needs of other infrastructure sectors (including rail, major road network), the supply chain would benefit from a need clear communication of schemes, allowing a sector wide approach to ensuring we have the skills available to match the scale of delivery.

It is important that National Highways, and ORR in its assessment of schemes, learn lessons from successfully delivered schemes such as the A14, which was opened ahead of schedule. Certainty for users and planning for minimal disruption for communities is important. To this end we are keen to ensure certainty of delivery of the RIS programme and therefore support a forward-looking approach to identify and resolve issues early.

Setting and meeting expectations will be challenging with many competing priorities. Continued engagement with partners will be key to ensure that processes and decisions resulting in the RIS document are communicated with clarity. Historically, input has been provided into the RIS development process but feedback has been limited until the publication of the RIS. This has led to uncertainty about how decisions on interventions have been made. Engagement will continue to be important to all stakeholders.

**Efficiency challenge based on National Highways' capabilities and advantages and disadvantages of the proposal to undertake capability reviews aligned to key areas of delivery.**

EEH agrees that ORR should take a pragmatic approach to assessment and issues advice on where the biggest impact can be made. Key areas of delivery should be assessed but ORR should also ensure that National Highways deliver towards policy aspects such as new technology, planning for net zero and the environment. For example, the implications of new technologies and processes should be assessed. In its role of monitor the ORR must ensure that changes and progress is being made, rather than just assessing progress ie. there is a role for ORR to ensure delivery. We strongly agree with the necessity to assess the impact of changes and learn lessons to ensure delivery can be efficient and impactful.

Ensuring there is capability within the National Highways organisation to effectively identify efficiencies as well as take forward the 'pre-efficient' costings, bringing in knowledge and evidence from lessons learned on previous schemes. As an STB considering the transport system as a whole we would like to see that the core scheme costs includes active travel links (compliant with LTN 1/20) and opportunities for shared transport, rather than these being outside the core scheme costings (they should not be an 'add on' but embedded within).

National Highways capability and approach in wider elements such as engagement should also be considered. An important element of this is playing back to partners the outcomes of engagement sessions and having ongoing conversations with STBs and Local Authorities. The STB Joint Engagement Action Plans between National Highways and STBs could be used as a base for information share and lessons learned.

**Proposed approach to assessing the costs and deliverability of the RIS3 enhancement portfolio. In particular we would appreciate your views on the relative merits of portfolio level and project level assessment**

Assessing the costs and deliverability of RIS 3



ORR should consider previous lessons learned in the assessment of cost and deliverability of the RIS3 enhancement portfolio. This should include delivery in previous RIS periods where enhancements listed in the RIS programme, where it has been challenging for National Highways to deliver the programme on enhancements. Certainty of delivery is critical for increasing confidence in the programme and future RIS cycles.

A RIS which also remains flexible and 'live' to the changing challenges and uncertainties is also welcomed, an approach which we understand National Highways are adopting for the RIS 3 process and beyond. To this email the ORR process should consider the effectiveness of delivery of the current RIS period, particularly assessing whether the schemes that form part of the 'tail' into 2025 – 2030 remain priorities and if and how this has been assessed.

Increasingly important in the development and assessment of interventions is the strategic case and overarching narrative. The importance on the strategic narrative during assessment should be considered by the ORR, as well as the deliverability and cost effectiveness of project – financial assessment should not be the sole consideration in assessment, particularly in the context of the future uncertainties faced by the sector and set out in the opening section of our response.

National Highways has a key role to play in ensuring the wider quality of life for communities is improved and enhancements should be assessed against this backdrop. EEH's transport strategy sets out the policy that: *'In identifying future investment requirements, we will prioritise proposals on the basis of value for money, their contribution towards achieving net zero carbon targets, and their contribution to wider sustainability, environmental net gain and health outcomes.'* This is a significant shift in the way we see roads investment in the future: for all sectors of society, not just road users. ORR should ensure its approach to monitoring and assessment of National Highways' performance consider this.

The Oxford Cambridge Arc Environment Group has collectively set a series of [environment principles](#), encompassing ambitious and aspirational targets for doubling nature, sustainable living and working and innovative solutions to energy and water. Where National Highways is delivering enhancements, they should be cognisant of locally or regionally set ambitions. For example, the current National Highways net biodiversity targets are below that of the Arc Environment Principles which aim for the delivery of 20% biodiversity net gain for all developments with a minimum requirement of 10% including Nationally Significant Infrastructure. Where the SRN currently causes issues such as poor air quality, National Highways should demonstrate that it has plans to address the issue, with the ORR ensuring plans are set and adhered to.

#### Good use of public money

The RIS should represent a considered programme which can hold up to scrutiny as being good value for money. Schemes that are good use of public money should enhance the end-to-end journey for users and ensure benefits for local communities, agreed at the time by those communities most affected. Alignment and a joined-up approach to enhancements and renewals would be beneficial, as would consideration of the whole life costing of infrastructure from the beginning of each project.

Future proofing the transport network through rapid and widespread adoption of new and emerging technologies, together with investment in digital infrastructure that is available to users beyond the highway network, need to be critical components of future investment programme. ORR, in its role as Monitor, must ensure that National highways actively invest in new technologies and facilitate innovation and foster a good use of public money.

#### Stakeholder engagement



Clear and transparent stakeholder engagement is of key importance in the development of any investment pipeline such as the RIS. ORR's role should be to monitor how National Highways are engaging and the stakeholder satisfaction with the engagement activities. ORR's monitoring of stakeholder engagement needs to go beyond monitoring a plan and focus on the approach to engagement – collaborative, responsive, open and transparent.

Important in this engagement is a clear communication of the process of how a final RIS process is set. Historically, schemes or interventions have been put forward but have not appeared in a RIS document without clear understanding of the interim period between initial engagement exercises and the final document.

National Highways Licence was published prior to the formation of STBs: the implications of which can be significant. There is currently no specific reference to STBs relating to engagement in the development of the RIS, although we do note that RIS2 outlined the importance of STBs playing an active role in articulating the benefits of proposals in their areas and the continued commitment to working with STBs and utilising a shared evidence base as outlined in the 'Planning Ahead for the Strategic Road Network' publication. In holding National Highways accountable to the licence, it is also important that engagement with STBs continues in the development of RIS3. This includes aligning RIS 3 principles with strategic regional priorities as set out in each of the STBs transport strategies, both on an investment and policy basis and throughout each of the stages of the RIS development process.

There are further process challenges relating to National Highways Licence. National Highways are required to provide options to the DfT for a scheme but lack the flexibility to amend the project specification – they are licenced to deliver what is commissioned. In turn, the DfT's structure does not encompass an opportunity to analyse situations where the commission is incorrect or needs to be flexible to changing circumstances.

#### Monitoring commitments set out in the delivery plan

Monitoring and evaluating by the ORR of National Highways' compliance against the objective to support all road users (including active travel, public transport and freight) is essential as we move towards a more tailored people-centred approach to transport planning in the future.

More emphasis should be given on how the predicted benefits of their proposals are measured and the outcomes of enhancements should be monitored. The impact of enhancements to the SRN may be felt across other routes, modes, and a wider geography than the location of the intervention.

The consultation document notes that ORR's ability to perform their assessment of National Highways is largely dictated by the quality of data provided by National Highways itself. EEH would support benchmarking of information provided against other schemes similar in nature, potentially from overseas or other large scale roads programmes.

#### Project and portfolio assessment

Undeniably, assessing projects at an individual level is important to ensure they are delivered to time, quality and budget. However, from a regional perspective, there is huge benefits to taking a portfolio assessment approach.

The combined benefits and implications of enhancements (or operations, renewals and maintenance) can have considerable impact on a local area. Viewing these as a whole as part of the entire transport system is crucial to the development of a well-planned, designed and co-ordinated approach ensuring a journey from A to B is as seamless as possible for the user. As part of the Route Strategies process, National Highways are considering where the Major Road Network impacts the SRN. Investment in the region's Major Road network will be key to the strategically important road network, consisting of the SRN and MRN and the ORR should

ensure that funding for the combined road network is assessed and allocated to where intervention is required.

At a delivery level, viewing the impact of a programme of works would be beneficial. The Heartland region has many major projects such as HS2 and East West Rail in construction phases, leading to increased construction vehicles impacting local roads and communities. Phasing of the works will need to be considered to minimise disruption. In addition, maintaining a long-distance travel option for users will be key if one journey mode is impacted during delivery phases.

**Proposed approach to assessing plans for operations, maintenance and renewals. In particular, whether you agree with our planned focus on the quality of National Highways plans for maintaining and renewing the network**

EEH's transport strategy supports a whole system approach to transport – a co-ordinated approach to shaping connectivity and place making.

The whole system approach is extended to a recognition to invest in maintaining our existing infrastructure assets and deliver planned investment in a co-ordinated manner which encompasses the whole life costing on the asset. We are supportive of assessing the asset maintenance plans on an evidential basis, particularly noting that a significant proportion of the network is reaching its end of design life.

A focus on quality is supported to ensure that maintenance and renewals are fit for long term purpose, rather than a 'quick fix'. A long-lasting maintenance or renewal activity brings benefits for long term cost savings, reduced disruption and potential reduction in associated carbon emissions through undertaking work once rather than multiple times.

Managing and planning the SRN for the future is one of the Government's objectives provisionally identified for RIS3. Ensuring the opportunity to future proof the network during renewals is an opportunity that should be harnessed where possible, rather than retrofitting in future years (for example, digital provision).

We would also support planning operations, maintenance and renewals against a number of policy areas, such as flood risk management and climate change adaption, facilitating a joined-up approach between transport, utilities and environmental management.