



Department for Transport

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EEH Business Unit
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County Hall
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Date: 18/7/2023

Dear Sir/Madam,

National Highways Strategic Road Network Initial Report consultation

As the Sub-national Transport Body (STB) for the England's Economic Heartland (EEH) region we welcome the opportunity to participate in DfT's consultation on the Strategic Road Network (SRN) Initial Report.

STBs play a key role in setting the ambitions for strategic transport connectivity in regions across England as well as setting a direction of travel with the publication of regional transport strategies. 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 consultation on the SRN initial Report, which outlines the view of the current state of the SRN, potential future needs and proposed priorities for the next road period (RP3).

The Strategic Road Network (SRN) plays an important role in the transport system in the EEH region, supporting economic growth and connecting people and places within our region. It also provides key links between our region and the rest of the UK and provides a vital role in supporting the freight and logistics sector. Our transport strategy (policy 24) highlights support for investment in the Strategic Road Network (SRN) and Major Road Network (MRN) where we will support investment in the Strategic Road Network and Major Road Network



where it meets one or more of the following criteria and is consistent with wider environmental objectives;

- Protects and enhances the existing infrastructure asset
- Delivers a solution to an identified problem on the existing infrastructure asset
- Enables access to new economic opportunities and/or housing growth.
- Enables delivery of sustainable transport linkages such as public transport and active travel improvements

The SRN should be viewed as part of a wider transport system, and we therefore welcome the acknowledgement of integration of modes and networks throughout the SRN Initial Report.

Annex 1 of this document summarises some of the key points EEH wishes to highlight as well as more detailed comments on each section of the report. This response is being submitted alongside the consultation questionnaire provided on the Department for Transport's consultation webpage.

Once again, we thank you for the opportunity to respond to this consultation.

Yours sincerely,



Cllr Liz Leffman
Interim Chair, England's Economic Heartland



Annex 1: EEH response to Strategic Road Network Initial Report

EEH's response to the SRN Initial Report has been structured so that key overarching points are listed in bullet point below, followed by a full response.

Our overarching comments are listed in bullet point form below:

- We are supportive of taking the vision led approach outlined in the SRN Initial Report, noting that the outcomes of interventions should be at the heart of decision making in investment, as opposed to the tradition approach of predict and provide.
- The SRN Initial Report's acknowledgement that making best use of existing asset is important and that bringing forward maintenance schemes and small-scale enhancements to ensure that the SRN operates as effectively as possible, providing reliability for users. The need for targeted investment mirrors our policy position from EEH's Transport Strategy, published in 2021.
- The need for investment certainty, for both existing schemes and emerging priorities. Uncertainty and delays in investment is detrimental to the UK economy and our ability to lever the maximum return on investment from the infrastructure.
- The need to consider the transport system as a whole and consideration of integration of strategic networks and local networks is an important element of the SRN Initial report, most journeys begin on a local network and engagement with STBs and Local Authorities is essential to plan a coherent network, with funding parity regardless of road type.
- We welcome consideration of future proofing of the network and the role and function that roads play, specifically with consideration for all users, including public transport and active travel. Early engagement with Local Authorities is essential if this is to succeed.
- A focus on the customer and communities is also welcomed. Better information provision and journey experience, including a choice of travel, and consideration of accessible and inclusive all users including non-motorised users is an important element of the Initial Report
- There are several schemes committed in RIS1 and RIS2 which have yet to be delivered. The delay in schemes can cause uncertainty for partners in network planning. In the EEH region, there are 3 RIS 3 pipeline schemes – the Initial Report acknowledges that if pipeline schemes are to progress, they would need to be delivered across multi-year periods. We are committed to working with National Highways and Local Authority partners to express the strategic case for pipeline schemes in the region, where they are supported by the Local Authority.
- There is a need for consistency between the SRN Initial Report and the Route Strategies (currently out for consultation).

EEH response

National Highways vision for the third road period is that *'The SRN is part of a seamlessly integrated transport system that meets our customers' needs by connecting the country safely and reliably, delivering economic prosperity, social value and a thriving environment'*. This vision aligns with EEH's ambition as outlined in our Transport Strategy published in 2021, which highlights sustainable growth and improving the quality of life through a decarbonised transport system which builds on our region's expertise in technology and innovation.

We are supportive of taking the vision led approach outlined in the SRN Initial Report, noting that the outcomes of interventions should be at the heart of decision making in investment, as opposed to the tradition approach of predict and provide. The areas of focus of; improving safety for all, making the most of the network, evolving customer and community services (including end to end journeys), taking a targeted approach to enhancing the network and



driving decarbonisation and environmental sustainability outcomes are a sensible approach of moving the vision forwards.

Overarchingly we are supportive of the SRN Initial Report's acknowledgement that making best use of existing asset is important and that bringing forward maintenance schemes and small-scale enhancements to ensure that the SRN operates as effectively as possible, providing reliability for users. The need for targeted investment mirrors our policy position from our Transport Strategy published in 2021, where road investment is supported under specific conditions – including targeted investment where it protects and enhances existing infrastructure asset, delivers a solution to an identified problem on the existing asset, enables access to new economic opportunities and enables delivery of sustainable transport linkages.

However, if we are to support a more targeted approach to investment, investment decision making must be much more transparent and certain. A lack of clarity of process along with uncertainty and delays in securing funding are all to the detriment of the UK economy and result in delivery of infrastructure that is not maximised in terms of its potential contribution to the county.

We are supportive of the document's acknowledgement that making best use of existing asset is essential and that bringing forward maintenance schemes and small-scale enhancements to ensure that the SRN operates as effectively as possible. A need for targeted investment is particularly important in relation to a challenging fiscal environment and a move towards net zero. The investment in maintenance must benefit all users of the network – as highlighted through the consultation responses from non-motorised users surface condition and maintenance is important for safety purposes.

The SRN Initial Report outlines that investment should first and foremost make the most of the network by keeping it in good order and offer increased choice to enable customers to travel differently and it is only after those steps that the network is improved by increasing capacity through technology, providing more physical space and junctions and providing more physical space on the main carriageway. Where large scale intervention is required, it should be targeted and bring benefit to local communities and the carbon implications and impact on future demand must be considered.

While this is admirable, to plan these interventions effectively requires a much closer and cooperative engagement with local authorities and STBs, allowing a single and shared approach to planning investment priorities. Smaller interventions do not operate in isolation of the wider network and therefore prioritisation of investment can not either.

The Initial Report outlines the ambition that the 'SRN will be decarbonised, placing roads at the heart of the UK's net zero future'. While we welcome efforts to decarbonise the SRN through electrification and construction activities, mode shift will play an important role in net zero as well as providing additional benefits of reducing congestion. Our EEH transport strategy outlines the requirement for modal shift and facilitation of transport choice to contribute towards net zero, alongside decarbonisation of the fleet.

It is positive to see an intent to consider all modes raised throughout the document and we would encourage National Highways to engage in debate about emissions – longer trips which likely utilise the SRN are disproportionately responsible for emissions and therefore there is a collective need to deliver mode shift.

We support the continued approach to working with Local Authorities to deliver the right journeys on the right road. There is currently a 26% "emissions gap" in government transport decarbonisation policy¹ and addressing this will require changes to the way the transport system is used. National Highways can not consider their responsibility to start and stop only

¹ <https://green-alliance.org.uk/publication/net-zero-policy-tracker-june-2023-update/>).



on the SRN, it must be part of a joint up approach with local authorities, STBs and National Highways working together to identify the best solution. Prioritising investment at the regional level, across road “types” is likely to bring much greater outcomes in this area.

Work undertaken by STBs on the requirement for electric vehicle (EV) charge point provision, shows that (as of Summer 2022) by 2030 we will need 3500 – 5000 rapid charge points in the EEH region. Support from National Highways in the delivery to accelerate the availability of electric vehicle charge points on the SRN is essential if we are to respond to the technical solution to decarbonisation that is currently being planned.

National Highways approach of applying PAS2080 to investment decision and managing infrastructure carbon should be applauded. The approach challenges the root cause of construction and delivering only when a problem can't be fixed by another solution; moving from building nothing (using technological solutions) through to building less, building cleverly and building efficiently. We would like to encourage National Highways to play a leading role in cascading knowledge from embedding this approach, working with local stakeholders to provide thought leadership in application of PAS2080.

National Highways works towards key performance indicators under safety; network and asset management; customers and communities; environment; and delivery.

EEH is supportive of interventions which improve the safety of the network, and therefore, the reduction of casualties. Our own transport strategy outlines prioritising a safe transport system and that where safety or perceptions of safety impair the ability to improve connectivity that we will work with infrastructure owners and operators to address this using a safe system approach. EEH is keen to support our partners wishing to pursue the application of 'vision zero' principles at the local level and National Highways zero harm ambition.

A focus on the customer and communities is also welcomed. Our own strategy emphasises the importance of the user. Better information provision and journey experience, including a choice of travel, and consideration of accessible and inclusive all users including non-motorised users is an important element of the Initial Report. The SRN can also have an impact on local communities, impacted by knock on effect of diversionary routes, and those living close to the SRN, where there are issues of air quality and noise – future planning for the SRN must take these considerations into account.

EEH, as a Sub-national Transport Body (STB), agrees with this sentiment that transport should be considered as part of a whole system approach, one which considers all modes of travel and how they interact. The majority of journeys start and end on a local network and therefore the interaction with the SRN and local roads (including the MRN) and the wider transport system must be considered. This must, however, come with funding for improvements to the local road network (including MRN) and forward planning about the impact on the whole network. There must be parity of funding for roads improvements regardless of who is responsible for it.

EEH welcomes National Highways ongoing engagement with STBs as well as National Highways proposed evolving approach of working with Local Transport Authorities in local ambitions and targets, this will be valuable for overall network coherence.

Early engagement with STBs and Local Authorities is vital to understand local plans and networks, including the impact of the SRN on local communities. Forward planning integration between rail, bus and active travel is essential to ensure choice and a coherent, joined up network as well as planning for the right traffic on the right roads. We therefore welcome the prospect of National Highways undertaking an assessment of active travel integration along their routes - this must include engagement with local partners and STBs to ensure future plans are integrated as well as integration into the national cycle network.



We welcome the ambition to make designated funds more accessible and simpler to apply for. Anecdotal evidence has suggested that the process for application can be difficult to navigate and therefore a clear approach is welcomed. We believe the elements such as active travel should be considered as part of the core schemes rather than an 'add on' where additional funding must be applied for and therefore, we are supportive of the statement to examine how the outputs delivered through designated funds might be carried out more effectively as part of business as usual.

The SRN Initial Report recognises the complementary role the SRN provides to the major road networks and local roads with the strategic and long-distance nature of the SRN providing long distance traffic with a safe and efficient route, freeing up local roads for genuinely local journeys and active travel.

The SRN plays an important role in the transport system in the EEH region, supporting economic growth and connecting people and places within our region. It also provides key links between our region and the rest of the UK and provides a vital role in supporting the freight and logistics sector and therefore the vision that *'Freight will move freely across the SRN, enabled by network improvements on key freight corridors, around international gateways and at major consolidation centres'* is welcomed. However, as outlined in the paragraphs below there should be increased cross-modal collaboration and partnership in this area.

The intent to undertake future work with Network Rail to understand the interaction between road and rail freight on major routes is welcomed. We are supportive of a shift from road to rail freight where possible, for environmental benefits as well as the benefits this can bring to a reduction in vehicles on the SRN. We would welcome engagement with National Highways and Network Rail in studies into the potential for mode shift for freight. By utilising the vision led approach described in the document, rather than 'predict and provide', the outcomes of an intervention must be considered in relation to whether they meet the vision and policy set. The consideration of alternatives and the outcome which they could provide must be a key consideration in investment decision making. For example, the solution to a road's performance issue may well be most effectively solved by an investment elsewhere – be it another form of infrastructure or through a connectivity-solution. Where these solutions can be demonstrated, access to funding should be mode-agnostic.

Taking a holistic view of a corridor (in a corridor led approach) would have the benefit of enabling the right solution to be found for the right place. By the way of example, the constraints on rail connectivity between Felixstowe and the Midlands and North places additional pressure on our strategic road infrastructure, with consequential implications for the logistics sector operation and carbon emissions. Investment in infrastructure to increase rail freight such as that at Ely junction will realise benefits on the strategic road network.

Driving a future proof networked where assets are digital by default via investment in technology for maintaining, managing and driving net zero in manufacturing is welcomed. The approach to future proofing the network must be applied when planning and delivering schemes (enhancements and maintenance) in order that there is a coherent approach to enabling the use of technology. We are supportive that national corridors will be CAV enabled providing congestion and safety benefits.

Future trends due to increased home working should also be monitored in the future to understand the impact on future demand. The consultation document acknowledges that the future is not certain and outlines that National Highways have examined alternative futures and the range of uncertainties ahead, including demand for road travel.

Integrating sectors such as transport and environment for example, water management or climate change adaptation, both for resilience purposes, as outlined in the document can bring about efficiencies over time and provide wider benefits for communities. We are therefore

supportive of the intent to consider climate change adaptation in National Highways operations.

It is noted in the SRN Initial Report that there are a number of schemes committed in RIS1 and RIS2 which have yet to be delivered. The delay in schemes can cause uncertainty for partners in network planning. In the EEH region, there are 3 RIS 3 pipeline schemes – the Initial Report acknowledges that if pipeline schemes are to progress, they would need to be delivered across multi-year periods. We are committed to working with National Highways and Local Authority partners to express the strategic case for pipeline schemes in the region, where they are supported by the Local Authority. Targeted schemes such as the A404/ M40 Handy Cross junction has long been a priority for the Local Authority, and we are keen that this is considered as a corridor approach along with the A404 Bisham pipeline scheme.

There are opportunities to integrate sectors such as transport and environment for example, water management or climate change adaptation. Combining thinking and delivery in different sectors can capture wider benefits for our communities by integrating solutions at early points in scheme development. It is in this context that our transport strategy outlines that all new transport-related development should protect and enhance the environment and be based on the principles of net zero carbon, net biodiversity gain, net environmental gain and contribute towards doubling the land actively managed for nature.

Our consultation responses to the Route Strategies (currently being consulted on by National Highways) will outline our route specific comments. As an over-riding comment it would be helpful for there to be consistency between the bodies of text in the Route Strategies which identify locational challenges and issues and those outlined in the Route objectives. It would also be beneficial to mirror the SRN Initial Report through to the Route Strategy, for example, there are missed opportunities for specific objectives about 'integration' (of modes and networks) in some of the Route Strategy documents.

Although this consultation does not include comments on the options for de-trunking, it is important to note that more discussion is required into the options for trunking and de-trunking. The A5 Luton – Rugby is proposed for de-trunking and there are major concerns over inheriting end of life asset (including structures), and the associated maintenance costs.

Finally, we welcome engagement with National Highways on the skills agenda, as outlined in the report.