# Shaping the future of England's strategic roads

RoSPA's response to Department for Transport and National Highways' consultation

July 2023

## Introduction

This is the response of The Royal Society for the Prevention of Accidents (RoSPA) to the Department for Transport and National Highways' consultation on shaping the future of England's strategic roads. It has been produced following consultation with RoSPA's National Road Safety Committee. We have no objection to our response being reproduced or attributed.

The consultation seeks views on the set of proposals made in National Highways' Initial Report. The report outlines National Highways':

- view on the current state of the strategic road network (SRN)
- potential future needs
- proposed priorities for the next road period (RP3), covering the financial years 2025-26 to 2029-30.

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## About you

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**Are you responding as an individual or on behalf of an organisation?**

On behalf of an organisation.

**Your organisation's type is best described as:**

Road user group.

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## Proposals

RIS3 has six strategic objectives, a summary of these objectives are stated below, although the full text is available in the planning ahead document.

### 1. Growing the economy

If the SRN performs its role of supporting long distance journeys then businesses prosper, by dependably connecting people to jobs and companies to customers. This includes ensuring resilient integration with our ports, airports and rail terminals through which we access global markets. It also means using roads to unlock housing and improving connectivity for communities that are poorly served. As we seek to build a stronger economy the role the SRN will play is vital.

### 2. Improving safety for all

Safety is our top priority for the SRN. RIS3 investments should increase reductions on the numbers of people killed or injured and working on our roads. England's SRN is already one of the safest in the world and we plan to do even more to prevent incidents arising and reduce the severity when they do occur. We may build the safest roads in the world, but if there are users who use them in an unsafe way these safe roads become dangerous. Working with National Highways and others we will invest in tackling behaviours that make road traffic collisions more likely.

### 3. Network performance to meet customer needs

We will explore what can be done to make journeys more reliable, less congested and safer while protecting the environment plus health and wellbeing. This will involve trying to meet the particular needs of all users, from freight firms to pedestrians, and where they interact with the network. The SRN is an aging asset with many structures nearing the end of their design life. As these assets age they are less predictable and resilient. To reduce this deterioration and retain the networks capacity we will need to continue to invest in maintenance and renewals.

### 4. A technology-enabled network

The context in which National Highways and the SRN operates is evolving. Changing ways of living, working, new services and technologies will change what we expect from the SRN and how it interacts with the local roads and wider transport. RIS3 will not be able to predict all these changes, but it should help prepare the ground for them, building in flexibility to respond as they emerge. We want to be ready to harness the possibilities of new technology to change the way people think about transport plus how vehicles and physical infrastructure respond to each other. Technology is not an end in itself, but it will play an important role to help improve network capability.

### 5. Managing and planning the SRN for the future

To develop a more sustainable and resilient economy, it will be crucial for the SRN to be in a good condition. We need to continue to improve our understanding of the condition of the SRN, its structures and associated

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equipment and ensure they are systematically renewed so they continue to serve the country while still well placed to deal with the challenges of climate change.

**6. Improved environmental outcomes**

Road travels future is decarbonised, with vehicles powered by electricity, hydrogen and biofuels, running on infrastructure that has been built, maintained and operated using near zero carbon products and techniques. The SRN's impact on the natural, built and historic environment is something that can, and must, continue to be reduced. In particular, we will consider how best to achieve biodiversity net gain, minimise light pollution and flooding risks, reduce impacts of air pollution and noise plus protect water quality.

## What level of importance, if any, do you assign to the RIS3 strategic objective of:

| | Very important | Important | Neither important or unimportant | Unimportant | Very unimportant | Don't know |
|---|---|---|---|---|---|---|
| Growing the economy | | X | | | | |
| Improving safety for all | X | | | | | |
| Network performance to meet customer needs | X | | | | | |
| A technology-enabled network | | X | | | | |
| Managing and planning the strategic road network for the future | X | | | | | |
| Improved environmental outcomes | X | | | | | |

## Why?

### RoSPA response

For RoSPA, the key priority is improving safety for all. We agree that any investment should be designed to reduce the number of people sadly killed or seriously injured on our roads each year. Although the Strategic Road Network (SRN) comprises some of our best performing and safest roads, more must be done to continually improve safety and to meet zero harm targets. There must also be a focus on our roads which are not performing as well, with a proportion of the funds invested in roads that receive a one- or two-star iRAP rating, aiming to raise them to a three-star rating or higher.

RoSPA also recognises the importance of network performance meeting customer needs to make journeys more reliable and less affected by congestion, which can be inconvenient and frustrating for customers. Therefore, roads must be maintained to ensure their continued performance and where necessary, renewed.

Technology can play a part in making journeys smoother and more reliable, but also in improving the safety of our roads. For example, on smart motorways, the use of stopped vehicle detection is increasing the speed at which National Highways operators can identify a stranded vehicle in a live lane, allowing them to close the lane and dispatch traffic officers to the stranded motorist. The continual review of technological assets, maintaining and renewing those at the end of life, also contributes to keeping our roads safe.

Given that the annual mortality of human-made air pollution in the UK is estimated to be equivalent to between 28,000 and 36,000 deaths every year[1], RoSPA strongly agrees that more must be done to improve environmental outcomes. RoSPA welcomes plans to facilitate the uptake of low-carbon vehicles, including providing the charging infrastructure necessary and would like to see further incentives to encourage the motoring public to consider changing to a low-carbon vehicle.

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[1] Office for Health Improvement & Disparities (2022) 'Air pollution: applying All Our Health'
https://www.gov.uk/government/publications/air-pollution-applying-all-our-health/air-pollution-applying-all-our-health
Date Accessed: 05/07/2023.

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## Proposals

The principal purpose of the SRN is to enable:

- safe

- reliable

- predictable

- rapid

often long-distance, journeys of both:

- people, whether as drivers or passengers

- freight

in England.

The SRN has a 4 point definition of:

1. Linking our main centres of population.
2. Facilitating access to major ports, airports, and rail terminals.
3. Enabling access to geographically peripheral regions of England.
4. Providing the main cross-border routes to Scotland and Wales

We are inviting suggestions about trunking and de-trunking. We propose to continue to use this four-point definition and any suggestions we receive will be judged against those criteria.

We are not making any new proposals for the transfer of specific roads to or from the SRN at this stage.

We are inviting suggestions about:

- trunking, adding roads to the SRN that are currently locally managed, candidates

- de-trunking, transferring parts of the SRN to the relevant local highway authorities,

candidates

Any changes of ownership between National Highways and local highway authorities would be subject to:

- discussion

- assessment

between the relevant parties before they are finalised.

A change in ownership does not necessarily mean a change in level of investment in a road or its performance.

The trunking candidates for the next road period from 2025 are:

- east region of the A12, Ipswich to Lowestoft

- east region of the A127, M25 J29 to Southend on Sea

- east region of the A13, A1014 to DP World London Gateway Port

- east region of the A13, A130A13 and A130, Stanford-le-Hope to Southend-on-Sea

- east of the A140, Ipswich (A14) to Norwich (A47)

- Midlands A15, Lincoln to M180 J4 at Broughton

- north-east A15, M180 junction 5 to Humber Bridge (A63)

- south-east A229, M2 junction 3 (Chatham) to M20 junction 6 (Maidstone)

- south-east A249, M2 junction 5 (Sittingbourne) to M20 junction 7 (Maidstone)

- south-east A299, M2 junction 7 to Port of Ramsgate

- south-east A329(M), A322, A329(M), A329 and A322, Reading to Guildford

- south-east A33 and A339, Reading (M4 junction 11) to Basingstoke

- Midlands A453, M1 to East Midlands Airport

- Midlands A46, Lincoln to Grimsby

- north-west A5300, Knowsley Expressway

- north-west A590, Dalton-in-Furness to Port of Barrow

- north-west A689, Warwick Bridge swap for A69 (Carlisle)

- north-west M62, junction 6 to junction 4 (Liverpool)

- Midlands A45 and M42, junction 6 to Clock Interchange (Solihull)

The detrunking candidates for the next road period from 2025 are:

- Midlands A40, M5 junction 11 to Boxbush

- Midlands A5, Luton to Rugby

- north-west A585 and M55, junction 3 to Fleetwood

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- north-west A69 Carlisle, Warwick bridge exchange

- Midlands Eastway, (National Exhibition Centre) Birmingham

- south-west, M32, M32 junction 1 to junction 3

We are not considering consulting on this existing list and are only seeking views on additional routes that you think should be considered.

**What, if any, other specific roads do you think we should consider as:**

- **trunking candidates**
- **detrunking candidates?**

**RoSPA response**

RoSPA has no further comment.

## National Highways Strategic Road Network initial report

The initial report sets out National Highways' understanding of what its customers want, a safe, reliable network, which:

- supports net zero

- support better environmental outcomes

- is integrated

- is customer focussed

Having assessed the current state of its network and future trends, the initial report identifies the challenges that National Highways needs to address in the third road period in working towards its long-term vision and uses this insight to set out its plans. It identifies 9 focus areas in how it will respond to those challenges, split across 3 groups.

How much its customers will travel:

- growth and levelling up

- car travel

- freight and logistics

How its customers will experience travel:

- safety

- digital

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- decarbonisation

How it will manage its network towards:

- customer experience

- sustainable network development

- asset resilience

**Do you think National Highways has identified the right focus areas?**

| | Yes | No | Don't know |
|---|---|---|---|
| How much its customers will travel | **X** | | |
| How its customers will experience travel | **X** | | |
| How it will manage its network | **X** | | |

## Planning for the third road period (2025-2030)

To meet National Highways' vision for the third road period and address the forecast challenges, the SRN Initial Report sets out a series of proposals. These proposals are grouped under five core themes:

- improving safety for all

- making the most of the network

- evolving NH customer and community services

- driving decarbonisation and environmental sustainability

- taking a targeted approach to enhancing the network

The core themes are summarised below, but greater information is available in the SRN initial report.

**Improving safety for all**

This will involve reducing the risk on our 1-star and 2-star iRAP (International Road Assessment Programme) rated roads, lifting the rating to A 3-star or better rating where possible, and play a stronger role in influencing user behaviour and vehicle standards.

**Making the most of the network**

This will be done by operating increasingly connected roads, undertaking increasing proactive maintenance, making our technology more resilient and investing in vital renewals to deliver safer, more reliable journeys.

**Evolving NH customer and community services**

This will be done by improving the data and information we provide to our customers. Taking a broader approach to supporting end to end journeys, including improved facilities for freight and non-motorised users. Supporting growth and development alongside the SRN and addressing legacy impacts on our network, including air quality and noise

**Driving decarbonisation and environmental sustainability**

National Highways is to achieve net zero corporate emissions, and reduce maintenance and construction emissions between 40 and 50%. Facilitate low-carbon travel and demonstrate wider environmental leadership, including around biodiversity and climate resilience. Invest in low carbon technology to drive a step change in manufacturing

**Taking a targeted approach to enhancing the network**

National Highways will continue to invest in the network, following the carbon management principles of PAS 2080M and only building when the problem cannot be fixed by other approaches. Meeting network needs by completing committed schemes, investing in Lower Thames Crossing, and producing more, smaller value, £2 million to £25 million schemes.

Greater information on 'improving safety for all' is provided in the 'Planning for the third road period' and 'Improving safety for all' section of the SRN Initial report.

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## Improving safety for all

### To what extent do you agree or disagree with National Highways' approach to improving safety on its network?

### RoSPA response

Disagree.

### Why do you disagree with the approach?

### RoSPA response

Although RoSPA supports and welcomes the ambition to improve safety for all, we do not feel that the approach goes far enough. RoSPA notes that in the document, National Highways has a key performance indicator to reduce the number of people killed or seriously on the SRN to 50% of the 2005-2009 baseline by 2025. By 2019 there was a 32% reduction and by 2020, there was a 54% reduction. Although we recognise that the reductions in the number of people killed and injured in 2020 are likely to be due to the pandemic, we do not believe that it is ambitious enough to continue to strive for a target that has been surpassed.

The document also mentions reducing the risk on one and two-star iRAP rated roads, lifting the rating to three or more stars or more where possible, with the aim to improve 50 per cent during RIS3. Again, we would urge National Highways to be more ambitious about this target. We would like to see a commitment in line with the Global Plan for Road Safety that all new roads are built to a 3-star or better standard for all road users, and more than 75 per cent of travel is on the equivalent of 3-star or better roads for all road users by 2030.

We are pleased to see a commitment for National Highways to invest more into safety communications campaigns, working in consultation with partners and stakeholders with the aim to help educate drivers and make positive improvements to their behaviour while using our network. RoSPA would be happy to support the development and dissemination of these campaigns.

We also welcome the commitment from National Highways to adopt the safe systems approach, although what actions will be covered under each of the five pillars could be set out more clearly to allow for international comparison. We are very concerned that the document does not detail any information about how the 'safe speeds' pillar of the safe system will be implemented. Given National Highways' responsibility for the safety of the strategic road network, which includes much of the high-speed motorway network, it seems unusual that there is only a very brief mention of speed in the document. Higher speeds mean that drivers have less time to identify and react to what is happening around them, and it takes longer for the vehicle to stop. It removes the driver's safety margin and turns near misses into crashes. We would expect more to be done to manage speed on the network.

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## Approach to making the most of the existing network

Information on 'making the most of the network' is provided in the 'making the most of our network section' of the SRN initial report.

**To what extent do you agree or disagree with National Highways' approach for making the best use of the existing Strategic Road Network?**

**RoSPA response**

Agree.

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## Evolving National Highways' customer and community services

Information on 'evolving National Highways' customer and communities offer' is provided in the 'Evolving our customer and community services' section of the SRN initial report.

**To what extent do you agree or disagree that National Highways should evolve its:**

|  | Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree | Don't know |
|---|---|---|---|---|---|---|
| Customer offer? |  | X |  |  |  |  |
| Community offer? |  | X |  |  |  |  |
| Proposals for designated funds? |  | X |  |  |  |  |

# Decarbonisation and environmental sustainability

Information on 'decarbonisation and environmental sustainability' is given in the 'driving decarbonisation and environmental sustainability' of the SRN initial report.

**To what extent do you agree or disagree with National Highways' approach for driving decarbonisation and environmental sustainability on the SRN?**

**RoSPA response**

Strongly agree.

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## Taking a targeted approach to enhancing the network

Information on 'taking a targeted approach to enhancing the network' is given in the 'taking a targeted approach to enhancing the network' of the SRN initial report.

**To what extent, do you agree or disagree with National Highways' approach for its future enhancements programme?**

**RoSPA response**

Agree.

## National Highways performance

National Highways performance framework brings together the requirements that it is committed to achieving.

This includes targeted:

- key performance indicators

- performance indicators, which together make up the suite of RIS performance metrics,

- descriptive commitments

The initial report summarises insights on the current RIS performance metrics, including improvements that could be made to the:

- existing measures

- gaps where new metrics and targets may be needed

**To what extent do you agree or disagree with the assessment in the SRN Initial Report on the most important performance outcomes to measure?**

**RoSPA response**

Agree, on the understanding that safety KPIs will be maintained. We would be interested to understand more detail about how the impact of this strategy will be evaluated and how often it will be reported on.

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## Cross cutting proposals

The five core themes in the initial report:

- improving safety for all

- making the most of the network

- evolving NH's customer and community services

- driving decarbonisation and environmental sustainability

- taking a targeted approach to enhancing the network

cut across a number of aspects of SRN operation and use on which we would also welcome your views.

**What, in your view, could be done differently to meet the needs of people affected by the:**

- **presence of the SRN**
- **operation of the SRN?**

### RoSPA response

RoSPA welcomes the environmental sustainability and decarbonisation approach being taken to improve air quality, which will have positive impacts for those living close to the SRN.

We also welcome the commitment to explore active travel and would welcome any schemes that make cycling and walking safer. Those living near to busy parts of the SRN network may be encouraged to choose active travel modes if the infrastructure to help them feel safe while doing so is in place. We would welcome any announcement that funding would be allocated to these schemes.

## Digital technology set out in the SRN initial report

National Highways assesses the role of technology in supporting its 5 core themes that underpin its plans for the third road period.

This includes using and improving digital and technology to:

- run the network

- renew assets – including tackling the backlog of technology assets that are at:
  - end-of-life
  - need upgrading
  and increase consistency

- meet customer expectations and connectivity through technology

- improve the SRN in a sustainable way

**Do you think the approach to digital technology set out in the SRN initial report puts National Highways on the right track for meeting its vision for 2050?**

**RoSPA response**

Yes, but adjustments should be made as necessary if there are any safety critical issues with technology, with these prioritised.

## Equality impact assessment

**What, if any, evidence and other insights can you supply towards the development of our RIS3 equality impact assessment?**

**RoSPA response**

RoSPA is not in a position to comment.

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## Analytical approach

Analysis is a complex and important part of how we both gather and utilise evidence as part of the development of RIS3. Alongside this consultation we have also published a strategic outline of the approach we are taking on analysis for RIS3 for which we are seeking your views.

### What, if any, comments do you have on the analytical approach?

### RoSPA response

RoSPA supports the aim for relevant, robust, and trusted analysis to support decision making in all key RIS3 areas. We expect that safety data will be taken into consideration when making decisions.

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## Final comments

**Are there any other issues you think the government should consider as part of this consultation?**

**RoSPA response**

No.

**Any other comments?**

**RoSPA response**

RoSPA has some comments on the five themes of the document. Under the making the most of our network priority, although we agree with the approach as a whole, which is in line with the public's wishes to focus investment on keeping current roads in good working order before building new ones, RoSPA has some concerns about the commitment to tackling the backlog of technology assets. National Highways are increasingly reliant on the varied and extensive operational technology available to identify incidents, control traffic flow and provide information to customers. These assets, of which there is a backlog, are described as being end-of-life and there is a proposal to upgrade legacy or out-dated systems to current standards and increase consistency across the technology estate. In principle, we agree that this should be done, but as far as we are aware, there is no information publicly available on what the effects of this known backlog of end-of-life assets is on the safety of our roads. This potential impacts of this should be assessed, and if there are negative impacts for safety, the replacement of these assets must be prioritised.

RoSPA agrees with taking a targeted approach to enhancing the network, but seeks clarification on some of the content in this section. Firstly, we would like to see the timeline for completion of all stocktake actions for smart motorways included. We also support the focus on local schemes, where funding allows, but would like to understand whether National Highways will be actively applying for additional funding for these projects. Finally, we are pleased to see a commitment to increasing safety on single carriageway and other A roads, but seek more detail about this proposal.

RoSPA has no further comments to make on the consultation process, other than to thank Department for Transport and National Highways for the opportunity to comment. We have no objection to our response being reproduced or attributed.