



Department  
for Transport

# Shaping the future of England's strategic roads

Summary of public consultation responses to National Highways' Strategic Road Network Initial Report for RIS3

August 2025

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# Executive summary

## Introduction

From 18 May 2023 to 13 July 2023, the Department for Transport held a public consultation on the National Highways Strategic Road Network (SRN) *Initial Report*<sup>1</sup>. The *Initial Report*, which was published at the same time as the consultation document, set out National Highways' proposals and priorities for the management and development of England's motorway and major A road network (the Strategic Road Network) during the third road period (RP3), from 1 April 2026 to 31 March 2031. This consultation was the first step in the statutory process for setting the third Road Investment Strategy (RIS3), which is the Government's statement of the funding available and performance and delivery expectations.

Following the end of the Second Road Period in March 2025, the Secretary of State for Transport announced a one-year Interim Settlement covering the period April 2025 to March 2026, to prepare for RIS3. This interim period has ensured that current programmes and committed enhancements can continue as planned.

The consultation received 453 responses, of which 68% were from individual members of the public, with the remaining 32% from organisations, comprising principally local authorities, Sub-national Transport Bodies, business groups, safety and environmental campaign groups, and road user groups.

The Department has also carefully considered the views of the various Sub-national Transport Bodies (STBs) and Transport for London. These organisations represent the interests of local authorities and businesses in their regions, and have a holistic view of the transport needs of their areas as well as providing local insight into the current performance and resilience of the Strategic Road Network and future investment priorities.

## Campaign Responses

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<sup>1</sup> <https://nationalhighways.co.uk/our-roads/future-roads/strategic-road-network-initial-report/>

Two organised campaigns contributed to the consultation, representing 46% of the total responses. A short summary of these responses is below but these are considered in more detail in chapter 2.

195 responses were received from a campaign organised by Transport Action Network, in the form of a broadly standardised response. The response argued that the focus of RIS3 should be on reducing motor vehicle traffic, and that all road schemes that add capacity (including committed RIS2 schemes) should be stopped. Instead, greater emphasis and investment should be placed on active travel, public transport and increasing vehicle occupancy.

12 responses were received on behalf of a second campaign organised by a community action group led by the local MP, which urged improvements to the A1 and at-grade junctions between Biggleswade North and Buckden (specifically near Sandy and Beeston), Bedfordshire, also following a standardised format. Although the consultation received a range of responses supporting specific enhancement proposals to the SRN, this was the only organised, standardised response for a specific network enhancement proposal.

For both campaigns, we have counted each as a single response in the quantitative and qualitative analysis which is considered in detail in chapter 3.

Over half of investment in the SRN in RIS2 was spent on operating, maintaining and renewing the network. The need for spending on these activities will increase in RIS3 and beyond, reflecting the ageing network, much of which is reaching the end of its design life and needs to be replaced. As set out in the draft RIS3 document (published alongside this summary of responses), investment in enhancements to the network will continue to focus on those stretches of the network or pinch points where congestion and delay is at its most acute and will be made where no other practical alternative exists. Schemes will be designed with supporting active travel in mind and the SRN's role in supporting access to other transport modes.

The draft RIS does not detail individual proposals for capital enhancements to the network. Specific proposals to enhance the SRN identified in responses to this consultation will be considered as the formal investment plan for RIS3 is developed.

## Consultation questions

The consultation asked a series of specific questions regarding proposals in the *Initial Report* and DfT's analytical approach for RIS3. For the most part, respondents were broadly supportive of the strategic objectives for RIS3, and the proposals set out by National Highways in its *Initial Report*.

Respondents were most supportive of objectives and underpinning actions to improve road safety and deliver environmental objectives linked to reducing carbon emissions and enhancing the natural and built environment. 91% said improving safety was important or very important as an objective, and 53% agreed or strongly agreed with National Highways' approach. 91% also considered improved environmental outcomes as important or very important, with 45% either agreeing, or strongly agreeing with National Highways' approach.

Respondents were least supportive of investing in a technology-enabled network as a strategic objective (61% said this was important or very important). Nonetheless, 52% of respondents agreed or strongly agreed that National Highways' plans for digital put the company on the right track to meet future road user needs and network management. 67% of respondents considered the SRN's role in supporting economic growth as important or very important as an objective. 38% agreed or strongly agreed with National Highways' approach to its future enhancement programme and 55% with its proposals to make the most of the existing network. A more detailed description of the responses to individual questions are considered in chapter 3 of this document.

## General themes

Respondents were asked to provide additional comments where they disagreed or strongly disagreed with the strategic objectives for RIS3 or National Highways' proposals for RIS3. Qualitative analysis of these comments has enabled broad recurring themes to be identified in consultation responses, as well as captured as part of the final section of the consultation asking respondents to capture any additional comments they may have as part of their response. These are set out in the table below.

For each theme, it is important to recognise that there is a level of subjectivity to the categorisation and that a spectrum of different views was expressed on the topic. These themes are captured below, with a fuller exploration of their content throughout this document, principally in chapter 3.

The table below outlines the top themes; the number of topics they comprised and the total count of their references across all consultation answers. The topics for each theme captured a range of perspectives and is set in varying contexts, for example, the 'Safety' theme comprised but was not limited to speed enforcement, road worker safety, dangerous driving, and unsafe parking amongst the 20 total topics. This broad spectrum of topics was replicated across each theme and contributed to the total count of references to each theme across the consultation.

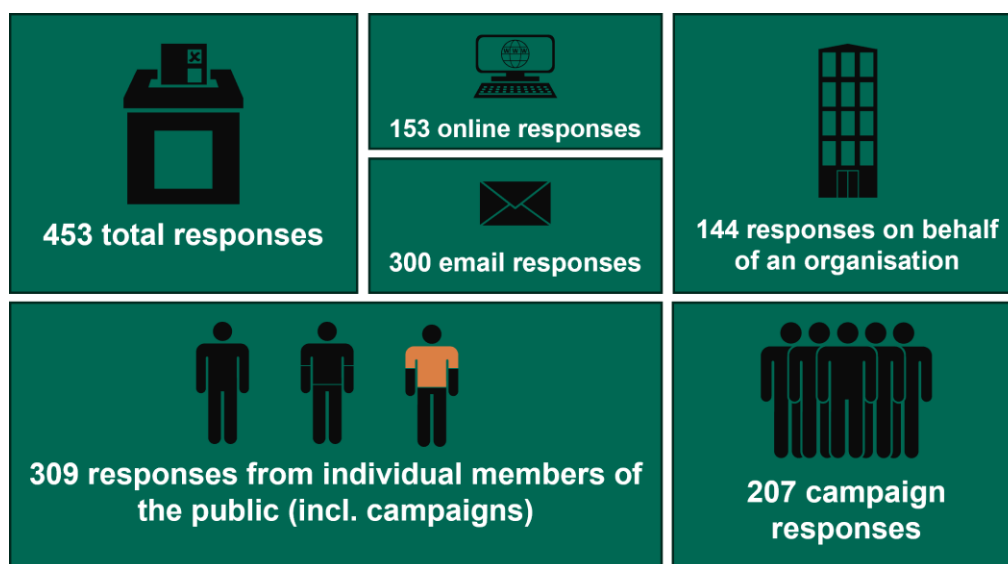
Theme	Number of topics	Total Count
Active travel	6	269
Carbon/Decarbonisation	10	264
Enhancements/New roads	9	207
Safety	20	207
Demand	12	200
Public transport	7	192
Promoting a specific road enhancement	5	180
Natural environment	9	138
Technology	23	131
Public health	7	124
Underpinning modelling	8	106

Theme	Number of topics	Total Count
Maintenance	8	103
Multimodal considerations	9	97
Integration	7	88
Collaboration	1	57
Low carbon fuels	3	57

# Chapter 1: Headline numbers at a glance

## Introduction

The below graphic and table sets out the headline numbers for the consultation as well as the composition of the organisations and individuals that responded.



Category	Response Total	Response as % (rounded to the nearest whole number)
Individuals (incl. campaigns)	302	67%
Local/Combined Authorities	43	9%
Business Groups	24	5%
Environmental Groups	23	5%
Government Department/ Executive Agencies	21	5%
Road User Groups	11	2%
Sub-national Transport Bodies	8	2%
Parliamentarians	7	2%
Supply Chain Bodies	6	1%
Local Highway Groups	4	1%
Academic Bodies	2	<1%
Local Enterprise Partnerships	1	<1%
Other	1	<1%



# Chapter 2: Campaign responses

## Introduction

This chapter addresses the issues raised by two campaigns, which represented 207 of the 453 consultation responses, 46% of overall responses. The largest campaign, organised by Transport Action Network, discussed SRN-wide concerns surrounding both safety and the environment and comprised 195 of the 207 responses, while a second, smaller campaign urged for improvements to the A1 near the towns of Sandy and Beeston, Bedfordshire.

### a.) Transport Action Network

The campaign coordinated by Transport Action Network (TAN) was responsible for the majority of campaign responses, of which 195 individuals submitted a broadly standardised response. The campaign was largely unsupportive of the proposals set out in the *Initial Report* as well as the strategic objectives for RIS3 more broadly with a particular objection to increasing road capacity/expansion, and the potential this would have for traffic generation and growth. The common thread through campaign responses was that increasing network capacity and reducing carbon were contradictory as objectives, and the focus should be on reducing motor traffic. Responses supported improved active travel provision and public transport services, as well as encouraging shared occupancy of vehicles and a faster move to electric vehicles.

Responses considered the strategic objectives for RIS3 of ‘improving safety for all’ and ‘improving environment outcomes’ as “very important”. In relation to safety, respondents said the focus should be on implementing cheaper and smaller scale interventions (such as speed enforcement), to improve safety and perceptions of it. Regarding the environment, the campaign considered that the current proposals have in their view not appropriately considered the significant role that carbon from road users plays in wider transport emissions and the impact this has on national efforts for meeting environmental and net zero carbon targets.

### b.) Other campaigns

We received 12 responses on behalf of a second campaign, which sought improvements to the A1 between Biggleswade North and Buckden (specifically near Sandy and

Beeston), in Bedfordshire, also following a standardised format. This was organised by a community action group led by the local MP, who are residents of Sandy and regular users of this stretch of the SRN.

Safety was a key issue, specifically, its impacts on congestion and delay.

*“This part of the A1 is dangerous, slow and subject to multiple lengthy delays which occur in the same places at the same times every day.”*

*“Accidents happen that see the road blocked, especially at the junction of New Road with the A1, sometimes necessitating the air ambulance to be called out.”*

The impact of the A1 on local residential areas was also an area of concern, particularly the health and environmental impacts of queuing vehicles.

*“Stationary vehicles queuing for the roundabout on the A1 at Sandy emit poisonous exhaust fumes that have created an affected area defined by the local authority as an AQMA.”*

Responses additionally highlighted the strategic importance of the A1 between Biggleswade North and Buckden as part of the Oxford/Cambridge arc and its role in unlocking economic growth; supporting surrounding local housing and business developments, particularly around Biggleswade and St Neots; and serving Tempsford railway station as part of a future East West Rail link. Funding for Tempsford railway station was announced by the Chancellor of the Exchequer, Rachel Reeves, in January 2025.

# Chapter 3: Consultation questions

## Introduction

The consultation asked a series of specific questions regarding proposals in National Highways' *Initial Report* in addition to the Department for Transport's proposed analytical approach for RIS3. This chapter considers the findings of the remaining 247 non-campaign responses (the campaign responses having been considered in chapter 2).

The consultation comprised thirteen [13] questions regarding the contents of National Highways' *Initial Report* in addition to the broader development of RIS3. These questions and the overall findings of the responses are explored individually throughout this chapter. The quantitative representation of findings provides a total percentage as well as a breakdown of responses between individuals offering a personal insight, and organisations providing a broader set of views. Respondents were asked to provide additional insights as narrative comments where they disagreed with the proposals in the *Initial Report*.

## Q1.) Strategic objectives for RIS3

We provisionally identified six [6] strategic objectives in *Planning Ahead*<sup>2</sup>, published in December 2021. These have shaped National Highways' initial evidence gathering through its route strategy process and framed the analytical evidence that will underpin investment and performance outcome decisions later in the RIS3 setting process.

Our six [6] strategic objectives are:

1. Growing the economy
2. Improving safety for all
3. Network performance to meet customer needs
4. A technology-enabled network
5. Managing and planning the SRN for the future

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<sup>2</sup> <https://www.gov.uk/government/publications/preparing-the-third-road-investment-strategy>

## 6. Improved environmental outcomes

The consultation sought feedback on each of these objectives and asks respondents to score their views on the importance of these objectives for RIS3, along with the opportunity to provide additional insight on their views, where respondents disagreed or strongly disagreed.

Respondents recognised the importance of each of the strategic objectives with the majority of responses scoring each objective as either 'very important' or important'. *Improving safety for all* and *Improving environmental outcomes* ranked as the most important objectives for respondents, with 91% of the approximately 216 responses to this question scoring these objectives as either 'important' or 'very important'. Table 1 and Figure 1 below sets out the results in more detail and the extent to which respondents ranked the importance of each objective.

Objectives	Very important	Important	Neither important nor unimportant	Unimportant	Very unimportant	Don't know
<b>Growing the economy</b>	36%	31%	15%	6%	9%	2%
<b>Improving safety for all</b>	68%	23%	4%	1%	1%	2%
<b>Network performance to meet customer needs</b>	42%	30%	14%	3%	8%	2%
<b>A technology enabled network</b>	26%	34%	22%	6%	9%	2%
<b>Managing and planning the strategic road network for the future</b>	47%	36%	6%	2%	7%	1%
<b>Improved environmental outcomes</b>	70%	21%	3%	1%	4%	1%

Table 1 - Strategic objectives (216 responses - not including campaign responses) [rounded to the nearest whole number]

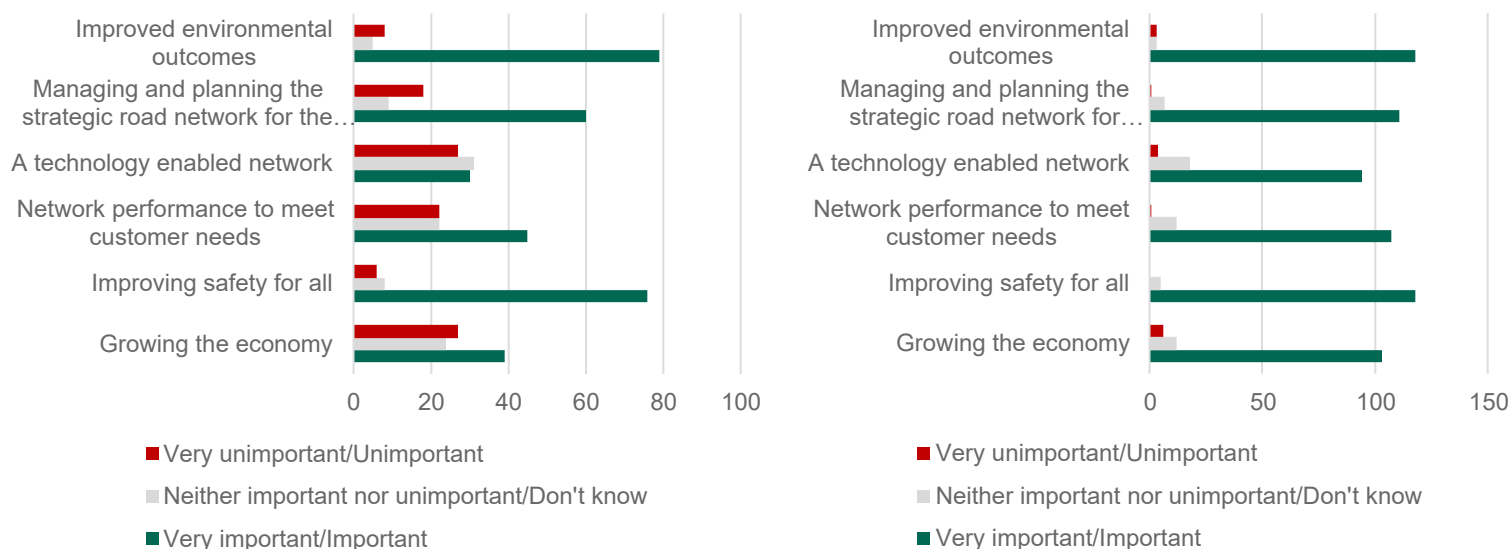


Figure 1: Strategic objectives – Individuals (left) and Organisations (right)

### Strategic Objectives - Common topics

The top ten most common topics that were captured as part of the review of the additional insight and comments to support the ranking of the objectives are set out in Figure 2 below.

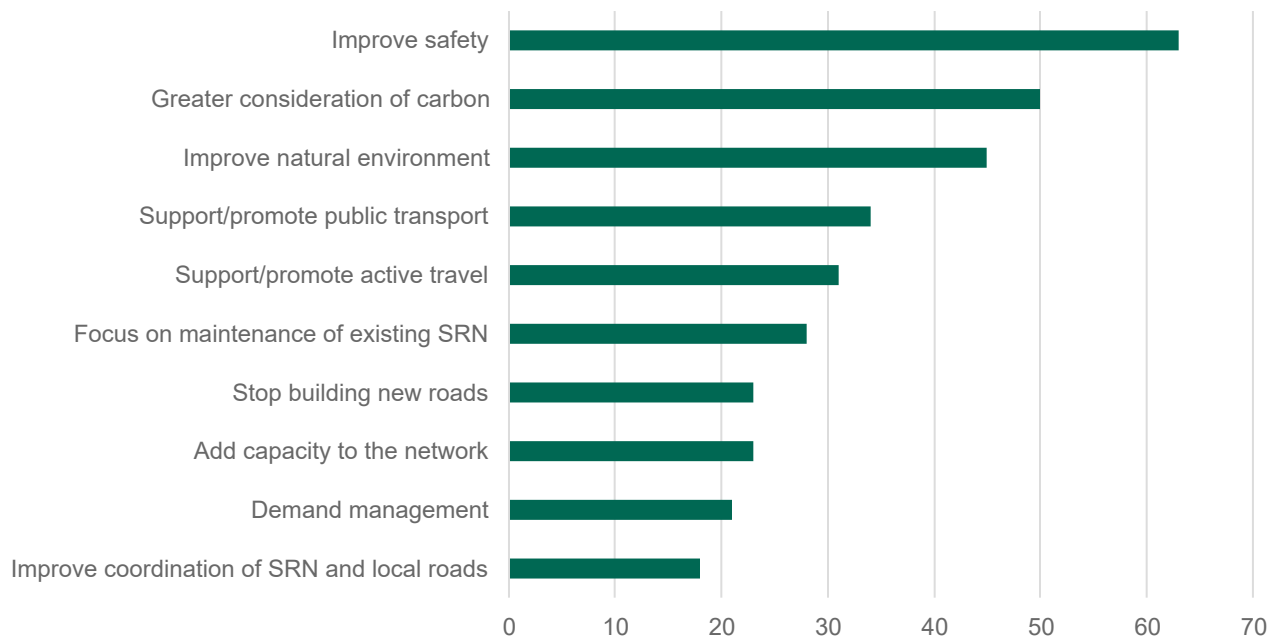


Figure 2: Strategic Objectives - Common topics

*"All the objectives are important but improved environmental outcomes must be the highest priority if we are to successfully address climate change and ... [improve]"*

*biodiversity in England. ... Improved environmental outcomes and decarbonisation are themes that must be embedded as essential components in all other objectives."*

*"The main priorities for the strategic road network should be around utilising technology to improve services for customers, creating a safer road network and supporting the environment...Whilst no less important, growing the economy and managing and planning the strategic road network for the future should be seen as key additional benefits for getting RIS3 right..."*

*"Safety is always the number one priority for our business, with a 'safety first' focus. It is heavily embedded in our training, operational practices and investment decisions...Growing the economy, managing and planning the SRN and ensuring strong network performance are all linked in our view and vital to ensure we can offer an efficient operation to our customers and keep costs low."*

*"The objectives for RIS3 (2025-2030) must be focused on what must be achieved by 2030. In the midst of the climate and nature emergencies environmental outcomes are the most important objective..."*

*"The SRN has a pivotal role to play in supporting growth aspirations and ensuring a well-managed and free-flowing network. Local Plans and future investment will rely upon an evolving SRN that supports sustainable development and provision of connectivity to growth areas."*

Whilst the responses were broadly supportive of the importance of the objectives as currently proposed, respondents provided a range of contrasting views mostly supported by insightful feedback on each of the objectives.

**Growing the economy:** The importance of this objective was recognised by respondents to the consultation, especially businesses, who agreed that one of the key roles of the SRN was to support growth, albeit respondents overall attached a lower priority than most other RIS3 strategic objectives.

**Improving safety for all:** As noted previously, this objective was ranked with the highest importance from respondents. Responses to the consultation suggested specific routes and roads where safety improvements should be considered. The role of speed limits and speed enforcement and a greater emphasis on the safety of cyclists and pedestrians were also identified.

**Network performance to meet customer needs:** Respondents to the consultation considered meeting the needs of road users as important within the overall set of RIS3 strategic objectives. Many recognised the need to invest in maintaining the existing network, even if they didn't specifically favour building new roads, and that both the SRN and local roads need to be properly integrated.

**A technology enabled network:** Overall, respondents to the consultation were less interested in the development and application of technology as a strategic objective in itself but recognised it as an important lever for positive change users of the network would like, particularly beyond the third road period. Respondents also cautioned against over-reliance on technology, particularly highlighting the link to road safety.

**Managing and planning the network for the future:** Respondents to the consultation attached a high level of importance to acting now in anticipation of future challenges. A recurring theme was maintaining the resilience of the network, particularly climate resilience in addition to planning the network to support the uptake and increasing fleet of low carbon vehicles. Others highlighted that by planning for the future, we should not assume business as usual traffic growth, but rather take a greater consideration of the role the SRN will play in the delivery of a decarbonised future - including that with lower overall demand for transport, specifically private car use.

**Improved environmental outcomes:** Alongside safety, this objective was ranked with the highest importance of all the objectives. Respondents highlighted the need for the RIS to be fully integrated with wider climate and environment objectives and public health priorities such as local air quality and noise. The need for emissions from traffic to be considered as part of climate change outcomes was a recurring theme in responses as was that environmental priorities should go beyond biodiversity to include water pollution, the historic built environment, as well as visual impacts of the network.

### Summary of Sub-National Transport Body views

Six STBs provided scores for this question, considering all strategic objectives to be either 'very important' or 'important'. They also highlighted the potential role of the SRN in improving public health and supporting social inclusion. All six said that growing the economy was 'very important' in supporting regional economic and international transport hubs but indicated that this must be achieved in a sustainable way. Safety was also considered a key priority; notably, improving safety in local areas impacted by severance. STBs suggested environmental outcomes can be improved through enhancing resilience of the SRN to extreme weather and climate change, reducing the need to travel, and protecting biodiversity and the historic environment. Slightly less emphasis was placed on network performance - where the value of collaboration with local authorities and other modes was highlighted, managing the network for the future - with the need for effective integration with local transport plans, and a technology enabled network.

## Q2.) Review of the extent of the strategic road network (trunking/detrunking)

As travel demand patterns change, it is important to be ready to consider the geographic extent of the SRN, so that roads best managed at a local level to meet a community's needs are in the hands of local highway authorities. Similarly, where a road's strategic significance or the composition and nature of traffic suggests it should be managed by National Highways, the department is willing to examine the case for adding it to the SRN with the support of the relevant local highway authority.

To support this periodic review of the extent of the SRN, the consultation sought insight on the existing list of potential candidates to be added or removed from the SRN (trunked/detrunked) as part of RIS3, including those identified in RIS2. In total, 96 responses were received from members of the public and organisations either suggesting wholly new potential candidate routes, supporting or flagging concern with existing candidate routes, or providing more general insight and feedback on the extent and purpose of the SRN more broadly and the use of trunking or detrunking powers to enable change relating to the operation, function and purpose of the existing SRN.

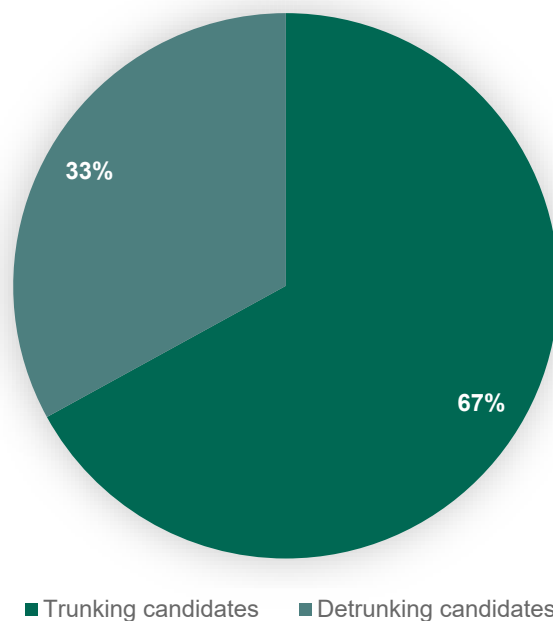


Figure 3: What, if any, other specific roads do you think we should consider as: (96 responses)

A number of respondents also shared their views on the concept of reviewing the extent of the SRN, as set out below.

*"Any SRN link / spur that doesn't support RIS3 strategic objectives and the operation, resilience and maintenance of the SRN should be de trunked. Detrunking should also consider the rationale of retaining obsolete Service Areas / Maintenance Compounds etc."*

*"The SRN should integrate with locations that are key nodes in the flow of goods/services to support a strong, growing and thriving UK economy. This should therefore include integration with transport (ports/rail/air) hubs, distribution hubs and manufacturing centres."*

*"[We] encourage the Department to work with National Highways to ensure that this is a data driven exercise using origin and destination information to determine where there is a significant use of local authority-managed roads ... as part of otherwise SRN journeys and developing trunking proposals on that basis."*

*"...while we do not make any specific comments on the (de-)trunking of any roads in this response, we do call upon National Highways to take decisions that guarantee the best possible performance of the routes used by our vital logistics businesses. Any decisions must ensure that where roads are transferred to National Highways, their integration with the local network continues to be supported and enhanced through an ongoing dialogue and co-investment with local stakeholders and businesses."*

*"...as part of modal shift and traffic reduction, fewer roads should be run by National Highways, with local and sub-national authorities taking on greater responsibilities."*



Most respondents proposed either a wholly new specific road to be considered or provided support or opposition to the existing candidate routes to be added or removed from the SRN. The rationale for these proposals was not always clear but respondents generally felt that if a route were part of the SRN, this would improve its performance through access to additional investment, thus generating more economic growth and opportunities for businesses and broader investment.

The Department is working closely with National Highways to determine which of the existing candidate routes could be taken forward for detailed development and possible consideration for RIS3 ahead of the publication of the final RIS in 2026 and is evaluating new routes identified in the consultation. The views expressed on candidate schemes, coupled with the range of broader insight captured as part of the consultation and *Route Strategy*<sup>3</sup> process, will play an important role in supporting that decision making.

### Q3.) Focus areas of the SRN Initial Report

The *Initial Report* sets out National Highways' understanding of what its customers want; a safe, reliable network, which supports net zero and better environmental outcomes and that is integrated, and customer focussed. Having assessed the current state of its network and future trends, the report identifies the challenges that National Highways needs to address in the third road period and beyond and uses this insight to set out its plans for RIS3 in the context of its long-term vision considered more fully in *Connecting the Country*<sup>4</sup>. The external focus areas that National Highways identify are principally:

- *How much its customers will travel:* growth and levelling up, car travel, freight and logistics
- *How its customers will experience travel:* safety, digital and decarbonisation
- *How it will manage its network:* customer experience, sustainable network development and asset resilience

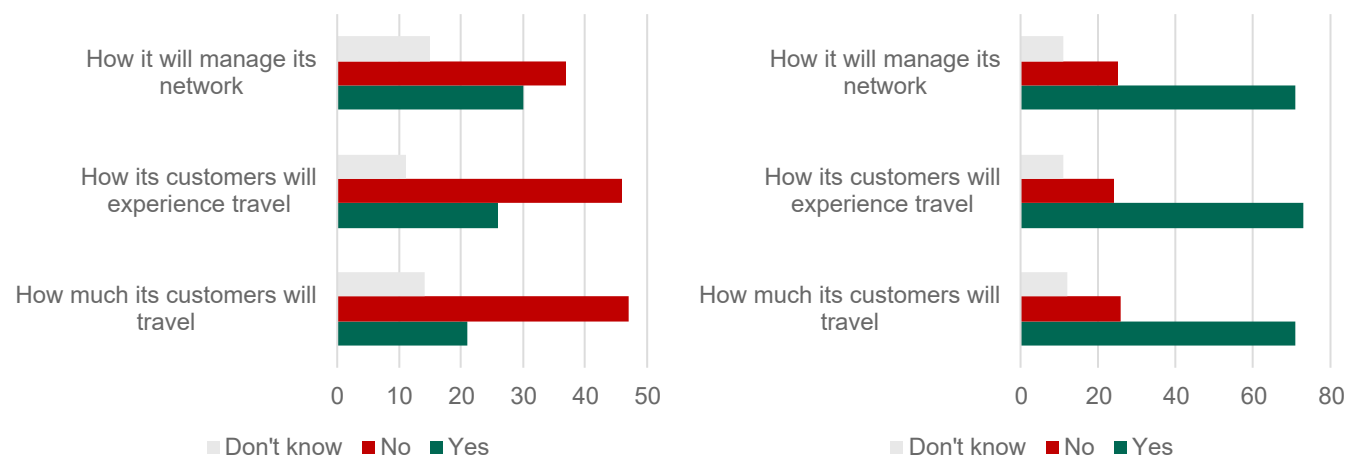
The consultation asked respondents if they believed National Highways had identified the right focus areas. Of the 192 responses to this question, the balance of respondents agreed that National Highways had identified the right focus areas, with those agreeing, outweighing those disagreeing. The results are described in more detail in Table 2 and Figure 4 below.

Answer choices	Yes	No	Don't know
How much its customers will travel;	48%	38%	13%
How its customers will experience travel;	52%	36%	11%
How it will manage its network;	53%	33%	14%

<sup>3</sup> <https://nationalhighways.co.uk/our-roads/future-roads/our-route-strategies/>

<sup>4</sup> <https://nationalhighways.co.uk/our-roads/future-roads/connecting-the-country/>

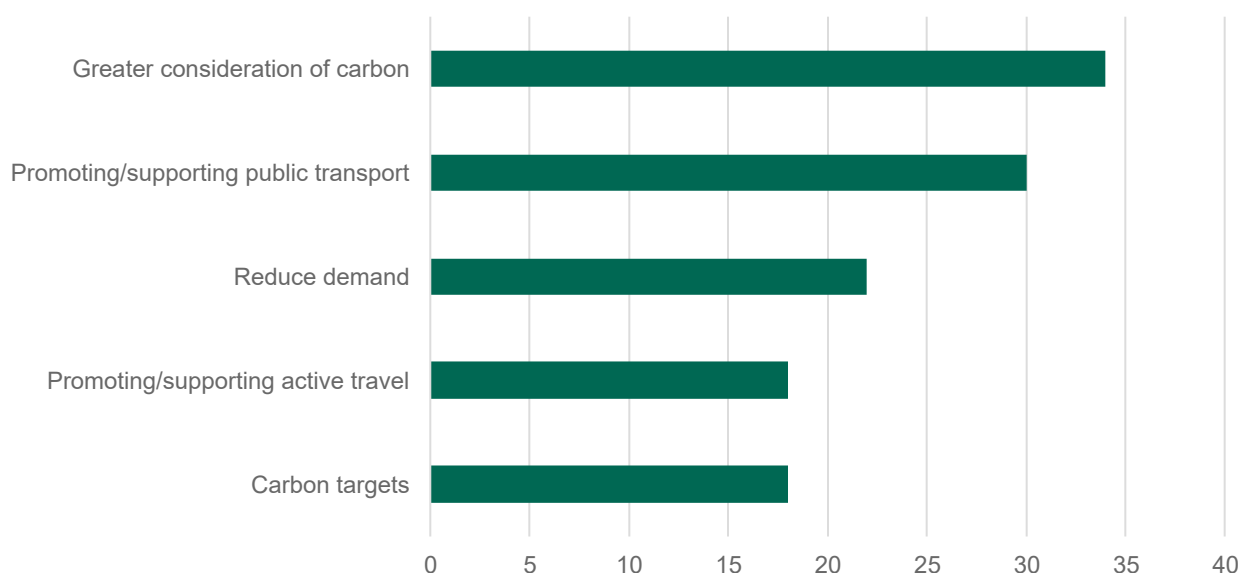
**Table 2: Do you think National Highways has identified the right focus areas [in the Initial Report]? (192 total responses) [rounded to the nearest whole number]**



**Figure 4 Do you think National Highways has identified the right focus areas [in the Initial Report]? Individuals (left) Organisations (right)**

### Focus Areas - Common topics

Where respondents disagreed, the top five most common topics captured as part of the review of the additional insight and comments are set out in Figure 5 below.



**Figure 5: Focus Areas - Common topics**

*"[We] support the proposed focus areas set out within the Connecting the Country Report. In particular, [we] support the vision for Net Zero of National Highways' activities by 2030 and the network users by 2050. However, the vision should include milestone objectives of what needs to be accomplished by 2030 in order to hit the 2050 target, particularly with regard to EV infrastructure. This would support [our] emerging*

*strategy objective of developing EV infrastructure over coming years, which is particularly important to support longer distance visitors and business users."*

*"I believe public transport should be prioritised (bus, coach, and rail travel) to help reduce traffic congestion, which will be beneficial for heavy goods vehicle (HGV) companies to deliver goods and freight early or on time, along with reducing carbon emissions."*

*"This should recognise that the transport network that customers depend on is not uniform with some areas/customers less reliant on sections of the SRN and other areas/customers, such as more rural areas, particularly dependent on good road connectivity provided by the SRN for longer and shorter journeys. This distinction in geography, connectivity and also access to alternative modes should be reflected in these challenges to be addressed."*

*"There must be a shift in focus to how to reduce car travel. Roads are not just about cars and lorries. National Highways must also consider how the road network can be used effectively, efficiently and safely for public transport and active transport. Funds should be invested for cycle ways and bus corridors, for example."*

*"We support National Highway's move to a decide and provide approach, working to be proactive in shaping the future for customers and the network. This aligns with our approach set out in the [our] Transport Plan, recognising that we cannot continue to support unfettered growth of travel by car. The nine focus areas set out a comprehensive framework for future trends and plans."*

Although respondents, on balance, agreed that National Highways had indeed identified the right focus areas as part of the *Initial Report*, a range of views were captured as part of the consultation.

### How much its customers will travel

**Growth and levelling up:** Respondents highlighted their views on likely spatial changes in demand, noting likely significant increases in population in wider urban conurbations and the reliance these communities will have on road transport, and trends in freight-reliant economic growth in areas less well served by existing transport infrastructure, such as off-shore wind and nuclear in East Anglia, and a wider spread of ports to provide greater resilience to industry supply chain.

The role of local plans in supporting decisions on future local growth needs was noted, and the value of National Highways' collaboration with STBs and local authorities. Some highlighted the need to consider future SRN development as part of a longer-term set of infrastructure priorities, with planning carried out in collaboration with other infrastructure operators. Others highlighted the competing objectives of the SRN supporting growth and levelling up with other objectives such as decarbonising travel.

**Car travel:** Some respondents suggested that the focus should be on reducing demand for private car use, and that new roads should not be built to provide additional highways capacity. In many cases reducing demand was linked to wider objectives around achieving net zero and decarbonising. Some respondents made the case for demand management

measures on the network to achieve this. Others highlighted the need to update traffic forecasts to avoid over-estimating future road traffic growth and embedding this to road enhancements and not assuming that traffic will grow, taking a revised approach at alternative future scenarios predicated around traffic reduction.

A similar proportion of responses to this question noted that there should be greater focus on modal shift and promoting greater uptake of local journeys by public transport. Some highlighted the work already being undertaken by local authorities in relation to public transport and active travel through local plans. A similar proportion noted that there should be greater emphasis on supporting active travel, and greater priority given to active travel infrastructure investment, often noted as an alternative to investment on the SRN.

**Freight and logistics:** Some respondents commented that the SRN would continue to be needed to support freight needs. A number of respondents noted a desire that greater focus should be placed on moving freight from road to rail.

### How its customers will experience travel

**Safety:** A number of respondents reinforced the importance of safety as a focus area. A number of respondents noted the importance of speed reduction in supporting safety objectives, but this view was not universally held. A further group highlighted the synergies between safety, for example through reduced speeds, and reducing carbon as outcomes.

**Digital:** Respondents noted the role of connected autonomous vehicles in supporting additional network capacity and highlighted the need to maximize the use of technology to achieve wider objectives, such as integration, safety and carbon reduction – through demand management.

**Decarbonisation:** Respondents said that there needed to be a greater focus on decarbonisation that focussed on road user carbon as well as carbon emissions from National Highways operations and that of its contractors. The need to improve electric vehicle charging infrastructure regularly featured in these responses. Where respondents commented on Publicly Available Specification 2080 (PAS2080), the global standard for managing carbon in infrastructure, National Highways' approach was generally supported.

### How National Highways will manage its network

**Customer experience:** A number of responses highlighted the importance of National Highways improving customer experience and satisfaction as part of its long-term plans. Improving reliability and reducing delay on the network was seen as a key enabler of user satisfaction. The importance of focussing on the maintenance and renewal of the existing SRN, particularly around road surface quality, signage and markings was regularly highlighted. Other respondents highlighted the importance of improving National Highways' customer offer, particularly in relation to incident management.

**Sustainable network development:** Where respondents expressed a view, there was support for sustainable development as a priority, particularly in relation to considering development of the SRN as part of a whole system approach that considered local roads, other transport modes and hubs that facilitate mode change. Others considered that National Highways' role in supporting sustainable development could go further in relation

to tackling community severance, transport related social exclusion, noise and poor air quality. The case was also made for greater synergy between transport and spatial planning, with greater focus on investing in viable alternatives that reduce the need for private car travel. A further group of respondents highlighted the need for greater focus on improving the natural environment adjacent or near to the SRN.

**Asset resilience:** Respondents supported a greater focus on asset resilience and highlighted wider network resilience as a priority. In some cases, the link was made with the asset and network needing to be able to cope with more extreme weather and improved climate resilience. In other cases, it reflected the demands that were placed on the network in terms of the wear heavier electric vehicles have on the network, and resilience of the network for freight and logistics operators, particularly at night when the most disruptive maintenance and renewals work is often undertaken.

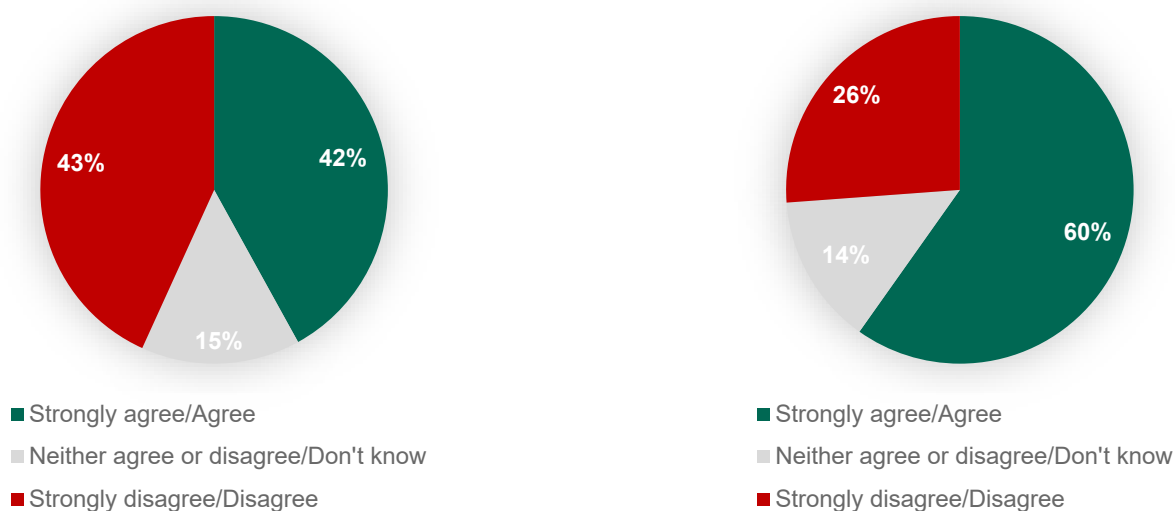
### Summary of Sub-National Transport Body views

Six STBs responded to this question, broadly agreeing that National Highways had identified the correct focus areas. They emphasised the SRN's vital role in connecting people and businesses, often as part of a journey that uses local roads at the beginning and the end, and its contribution to regional as well as national growth and connectivity. Freight was seen as a priority by all STBs and Transport for London, with unanimous appetite for more and better facilities for HGV drivers. There was also support for interventions to improve reliability and resilience, as well as capacity, on key freight routes to major ports and airports. The integrated role of the SRN as part of wider transport networks means future plans must consider its direct and indirect effects on communities close to the SRN, such as congestion and air and noise quality, and ensure effective integration between the SRN and local transport modes.

## Q4.) Improving safety on the network

Maintaining current safety performance will not be enough if National Highways is to achieve its long-term goals, including the long-term commitment to zero fatal and serious injury accidents. This will mean investing across every aspect of safety, from enhancement schemes and route treatments to improve the roads which present the highest risk, technology providing warning messages and instructions to drivers, training for National Highways staff and its contractors, and education campaigns for road users. It will also mean ever closer cooperation with the police and other stakeholders.

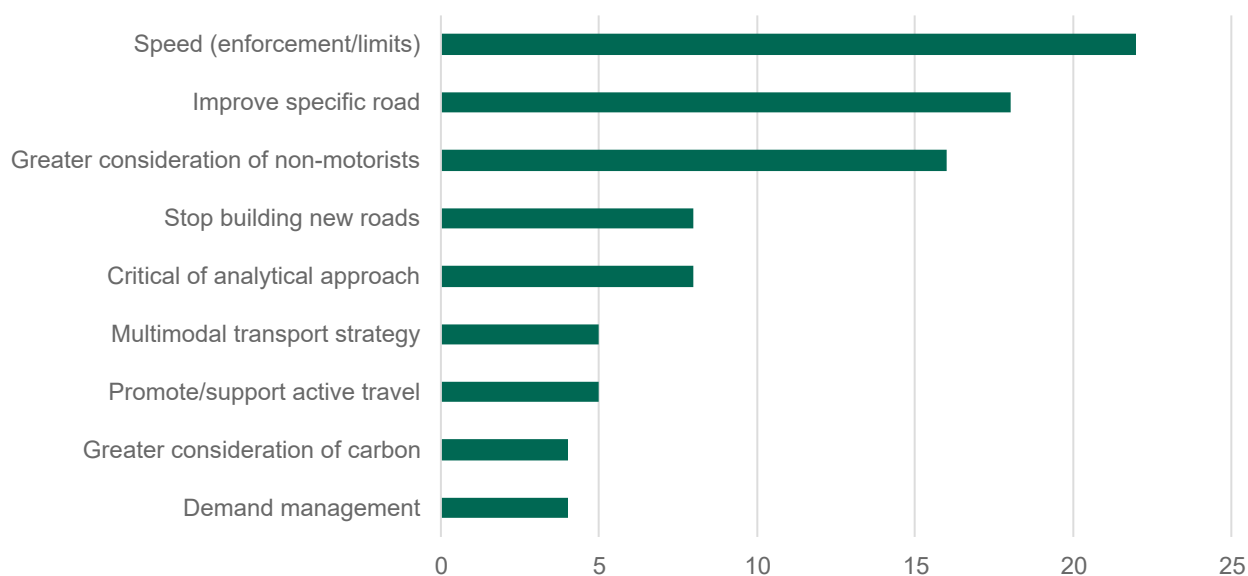
The *Initial Report* includes the intention to improve road safety in RIS3 through a holistic 'safe systems' approach, based on six pillars of safe roads, safe people, safe vehicles, safe speeds, road safety management, and post-collision response. The consultation asked respondents to what extent they agreed or disagreed with National Highways' approach to improving safety on its network. Of the 189 responses received for this question, 52% of total responses either 'strongly agreed' or 'agreed' with National Highways approach. The full detail of the responses are reflected below in Figure 6.



**Figure 6: To what extent do you agree or disagree with National Highways' approach to improving safety on its network? - Individuals - 81 (left) Organisations – 108 (right)**

### Improving safety on the network - Common topics

Where respondents disagreed with National Highways' proposed approach, the top nine most common topics captured as part of the review of the additional insight and comments to support the responses to this question are set out in Figure 7 below.



**Figure 7 Improving safety on the network - Common topics**

*"We agree improving safety for motor-vehicle users should be a top priority for the SRN. However, we would like to extend this to other users of the network or who interact with the network, including people walking, wheeling and cycling. Non-motorised road users are the most vulnerable users of the SRN, and their safety is paramount to delivering a safe environment for all users."*



*"We strongly agree with the approach to focus on roads currently with a 1-star and 2-star iRAP (International Road Assessment Programme) rating and would welcome lifting these to 3-star or better. Focus should be on those roads with a disproportionate number of road traffic collisions."*

*"[Our] members recognise National Highways continued focus on improving safety but feel that further work is needed to reduce the risk of incursions across the network. We note plans to further educate the road user, and improvements to driver education, and suggest that the current road safety KSI is updated, combined with further investment and focus on the safety of the road worker. This is particularly prudent given the move to deliver smaller schemes, which will have different safety requirements."*

*"We support the clear focus on improving safety for all SRN users, with an emphasis on "reducing the risk on 1-star and 2-star roads, rated by the International Road Assessment Programme (iRAP), lifting the rating to 3-star or better." We also support the commitment to work on influencing driver behaviour, to improve facilities for disabled drivers and invest in infrastructure improving safety for walkers, cyclists and equestrians."*

*"...Speed limits are poorly enforced on the SRN: in 2021 nearly half of cars on motorways exceeded the speed limit with 10% exceeding it by 10mph or more. Enforcement of existing speeds is an area where urgent action should be taken on all motorways..."*

Narrative comments from respondents focussed on the following themes.

**Speed and safety:** The link between speed and road safety was the most prominent theme in the narrative responses to this question, with respondents noting that the speed safety 'pillar' as outlined in the *Initial Report* needed greater prominence. Many responses proposed a reduction of speed limits on the SRN, particularly in urban and built-up areas, as the most effective way of reducing accidents where people are Killed or Seriously Injured (KSI) on the network. The link between speed and accident severity was regularly made. Some respondents commenting on speed suggested greater use of enforcement and increasing the use of average speed cameras to support safety on the network, with some respondents noting associated benefits for vehicle flow alongside safety benefits. Others argued for greater speed enforcement activity more generally without specific suggestions.

**Safety schemes:** A number of routes and specific safety pinch points on the SRN were identified in anecdotal feedback for further consideration for investment in roads which have particularly poor safety records and higher than average rates of KSIs. The insights will be fed into National Highways' route strategy review process for more detailed consideration.

**Risk exposure:** Another key theme across a range of responses was the desire to reduce demand for private car use to reduce overall risk exposure. Respondents highlighted the risk that a disproportionate emphasis on personal safety could mask wider harms to society of road use associated with air pollution, noise and carbon emissions. Others emphasised the best way to improve road safety was to encourage drivers to adopt other modes of transport which would also lead to improvements in congestion and pollution.

**Non-motorised road users:** A further theme regularly highlighted was creating a safer environment for non-motorised users, particularly in local communities where severance creates a greater interaction with the traffic using the SRN. To improve journeys, greater priority needed to be placed on improved paths, paths physically segregated from the main carriageway, and accessible crossings.

**Road design and maintenance:** A number of respondents commented on the link between road design and maintenance and road safety. Inconsistent standards at junctions between local roads and SRN roads were noted. Specific issues were also noted around vegetation, drainage, road markings, and signage. Several respondents wanted investment prioritised on roads which had the poorest safety record and supported National Highways' use of iRAP in conjunction with other outcome measures of safety performance, such as KSI accidents to give a more comprehensive assessment of a road's all-round safety.

**Vehicle technology:** Several respondents thought National Highways needed to focus more on emerging vehicle technology & innovation which could enhance safety or change motorists' perceptions of risk. This included safer vehicle standards and increased collaboration with vehicle manufactures and technology companies, particularly in the areas of researching autonomous emergency braking and autonomous vehicle technology.

### Summary of Sub-National Transport Body views

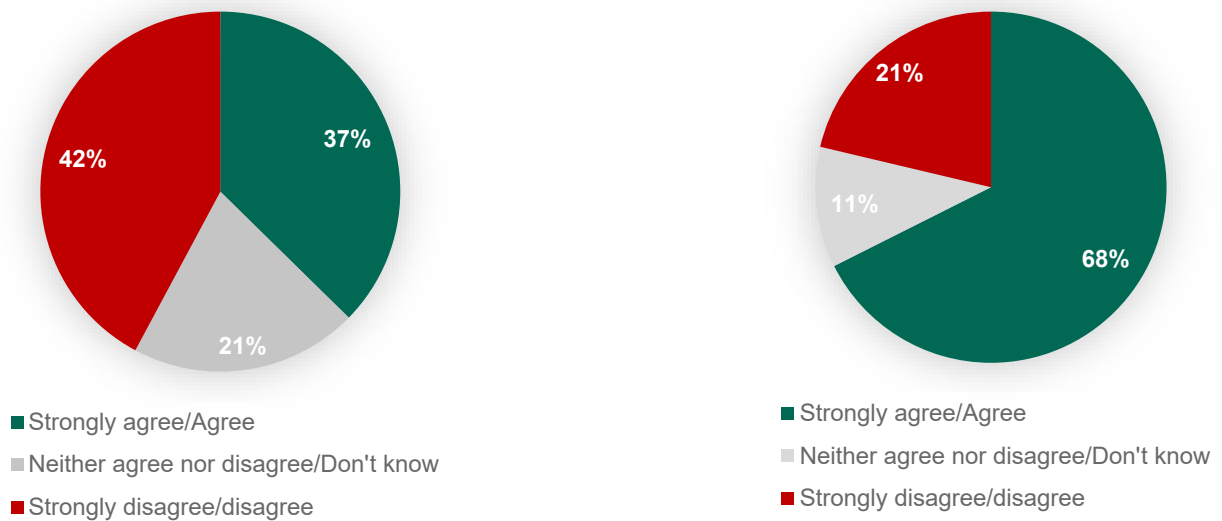
STBs strongly agreed with National Highways' proposals for improving road safety. Whilst their views are generally aligned to National Highways on the use of iRAP ratings as an appropriate tool to identify and prioritise safety improvements across the SRN, some STBs expressed views that iRAP data may underplay the risks on some sections of the SRN and recommended that additional safety and KSI data is referenced and overlayed by National Highways. More widely, National Highways should have an ambitious safety KPI that drives improvements across all its activities: network, company and supply chain.

## Q5.) Making the most of the network

The *Initial Report* considers the role of National Highways' 24/7 operational services in managing the network, including improved incident response capability and the safety and reliability of everyday journeys for road users. It examines the case for expanding its maintenance programme, including increasing proactive maintenance to reduce large repairs and avoid unnecessary restrictions and closures. It also highlights the increasing emphasis on renewal activities needed to keep the SRN open, safe, and serviceable, in particular, replacing worn out road surfaces, renewing ageing structures and replacing operational technology that requires major work to improve reliability and security.

Of the 192 responses received for this question, 55% of the total responses either 'strongly agree' or 'agree' with National Highways' proposed approach for making the best use of the existing network. The full detail of responses is set out in Figure 8 below.

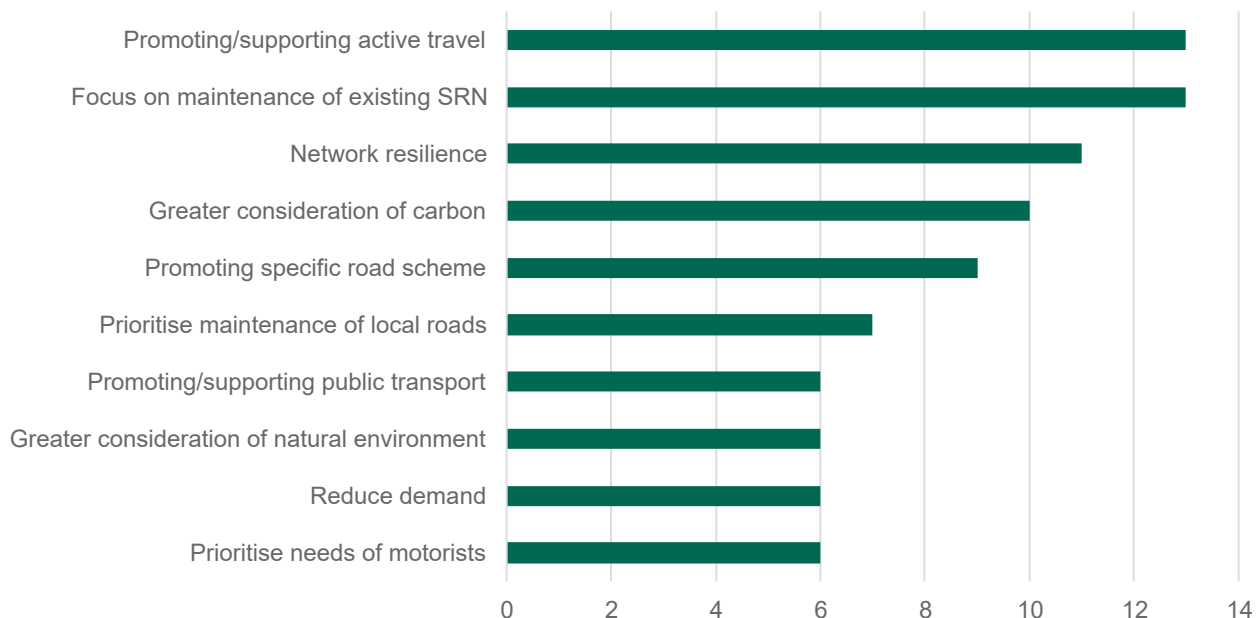




**Figure 8: To what extent do you agree or disagree with National Highways' approach for making the best use of the existing strategic road network? Individuals - 83 (left) Organisations - 109 (right)**

### Making the most of the network - Common topics

Where respondents disagreed with National Highways' proposed approach the top ten most common topics to support the responses to this question are set out in Figure 9 below.



**Figure 9: Making the most of the network - Common topics**

*"The priority to make the most of the existing network before building more is supported and is in line with carbon reduction ambitions. The increase in renewals of assets will reduce disruption as a result of asset failure, however care should be taken to ensure that this priority does not conflict with those to use less carbon intensive resources and innovative solutions should be continually researched and developed."*

*"National Highways should prioritise ensuring the current network is in good condition above developing new roads. The commitment of National Highways to ensure good condition and a program of renewal is pleasing. For community transport operators using the network, the conditions of roads are of the utmost importance. High-quality roads help to ensure safety, comfort for passengers and protect vehicles."*

*"The emphasis on better understanding SRN assets as set out in the Initial Report is therefore welcome and must be accompanied by an intelligent, proactive maintenance programme that identifies and remedies problems before they pose a threat to the safety or reliability of a route. In doing so, National Highways must strike the right balance between keeping interventions (and therefore disruption) to the minimum level needed to maintain the asset and ensuring that the whole asset lifecycle and broader economic impact are considered."*

*"We support recognition of the need for greater investment in maintaining the existing network and adaptation to impacts of climate change. Increased resilience of the network is a key priority in mitigating the potential for community and economic impacts of severe weather, with significant investment required to maintain and upgrade existing assets."*

*"While clearly it is important to undertake preventative maintenance and renewals before there are safety risks, there should be a far greater focus on traffic reduction to reduce ongoing maintenance costs."*

Narrative comments from respondents focussed on the following themes.

**Prioritising maintenance and renewals:** A proactive approach to maintenance and renewals of the SRN, was generally accepted as the right approach by the majority of respondents as more assets age and near or reach end of life. The benefits of such a programme to reduce the need for large-scale more disruptive repairs and avoid unnecessary emergency closures and restrictions in the future was also recognised.

A smaller number of responses provided anecdotal feedback on specific approaches to this maintenance. This included adopting a 'place-proportional approach' prioritising regions which are more dependent on the SRN for connectivity and recognising pressures on freight and logistics and single points of failure where there are few alternative routes available. Others highlighted that in addition to dealing with an ageing asset, future renewals and maintenance may be affected by the heavier weight of electric vehicles.

Whilst keeping users and freight moving on an ageing asset will require an increasing funding envelope, some respondents raised concerns that increases in maintenance and renewals are potentially funded by reducing investment in major projects aimed at policy objectives of economic growth, safety, housing, and carbon reduction. Others saw a move in funding away from enhancements to the upkeep of the existing network as a positive in reducing future growth in car travel.

**Network and asset resilience:** Equally, views were generally consistent on the importance of improving resilience of the network through active incident management and

enhanced maintenance. There was recognition of the increased need to protect against extreme heat and flooding, particularly on key corridors that are vulnerable as a result of topography, or underlying soil substrate. The role of technology was highlighted as particularly important by some respondents as underpinning a data-led asset management approach, and proactive maintenance to avoid costly reactive repairs.

**Upkeep of local roads and active travel infrastructure:** Some respondents highlighted the case for refocussing funding away from maintenance and renewal of the SRN and instead proposing investment on the upkeep of local roads and active travel infrastructure. Some went further and said that capital funding should be allocated to public transport provision in addition to active travel to provide attractive, accessible, low carbon alternatives to car journeys on the SRN. For others, it was recognised that a balance needed to be struck and reducing maintenance and renewal spending on the SRN would mean more traffic, and wear, on local roads.

**Prioritising carbon reduction:** Respondents noted that National Highways should give greater consideration to carbon and the natural environment through its operation, maintenance and renewal of the existing SRN. Comments in relation to carbon, focussed on reducing embedded carbon and carbon intensity of management, maintenance and other functions of the SRN. In considering the natural environment, comments focussed on reducing the impacts of existing infrastructure on water quality and run-off as well as habitat fragmentation.

**Role of technology:** Some respondents highlighted the need to maximise the application of technology. To support best use of the network more that could be achieved by wider application of technology already in place, with examples such as introducing more variable message signs on dual carriageway A-roads to improve safety and better inform users.

**Road user priorities:** Responses from road user groups highlighted the need to improve journey times and reducing delay from roadworks and the principal outcome to any approach of making best use of the network. Alongside this, greater attention needed to be paid to users' priorities from their experience of the network. Improved surface quality was identified as users' top priority, but the importance of the condition of road markings and signage, and consideration of welfare on diversionary routes was noted as a key user priority too.

**Making best use of the SRN with a wider transport network:** The need to take a holistic approach to making the best of the network was also raised by respondents. This emphasised the importance of collaboration with STBs, local highway authorities and other transport network operators in areas of resilience and diversionary routes, congestion hot-spots at the interface between the SRN and local roads, and technology to provide a more seamless user experience. A further group of respondents noted that there should be a greater consideration of local plans in future network planning decisions.

### Summary of Sub-National Transport Body views

STBs generally agreed with National Highways' approach to making the best use of the SRN. There was a general recognition that investment needed to be increased in renewals and maintenance, given the age of many of the assets. However, although they supported

a need for safe and reliable infrastructure, there was concern that this would divert funding from major enhancement schemes, that they argued were essential to achieve the economic growth expectations of the Government.

## Q6.) National Highways customer & community offer and proposals for Designated Funds

The needs of users of the SRN and those who live and work nearby are complex and diverse. National Highways proposes in its *Initial Report* evolving and growing its customer and community services capabilities. It proposes to broaden its activities around supporting better end-to-end journeys, continue to improve active travel provision and continue to address legacy impacts of the SRN, including but not limited to air quality and noise. Specifically for road users, National Highways would provide users of the SRN with more real-time, personalised route information, both before and during their journeys and support those wanting to take advantage of increasing vehicle connectivity. A new targeted programme for Designated Funds will be established to fulfil these activities.

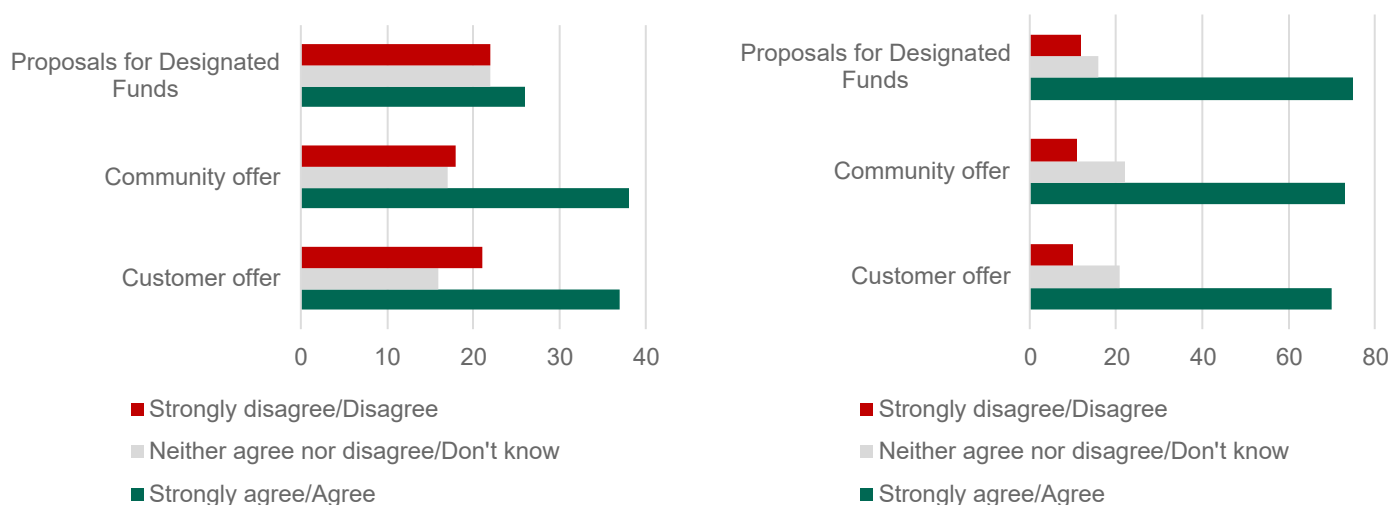
The consultation asked respondents to review these proposals in the *Initial Report* and outline to what extent they agree with National Highways proposals to evolve its:

- Customer offer;
- Community offer;
- Proposals for Designated Funds;

Broadly, respondents were supportive of National Highways' proposals to evolve its offers, with each of these approaches scoring 61%, 62% and 58% as 'strongly agree' or 'agree' respectively across the total of responses. The full detail of this scoring is set out below in Table 3 and Figure 10.

Answer choice	Strongly agree	Agree	Neither agree not disagree	Disagree	Strongly disagree	Don't know
Customer offer	25%	36%	18%	11%	7%	3%
Community offer	28%	34%	20%	10%	7%	2%
Proposals for Designated Funds	25%	33%	21%	12%	8%	1%

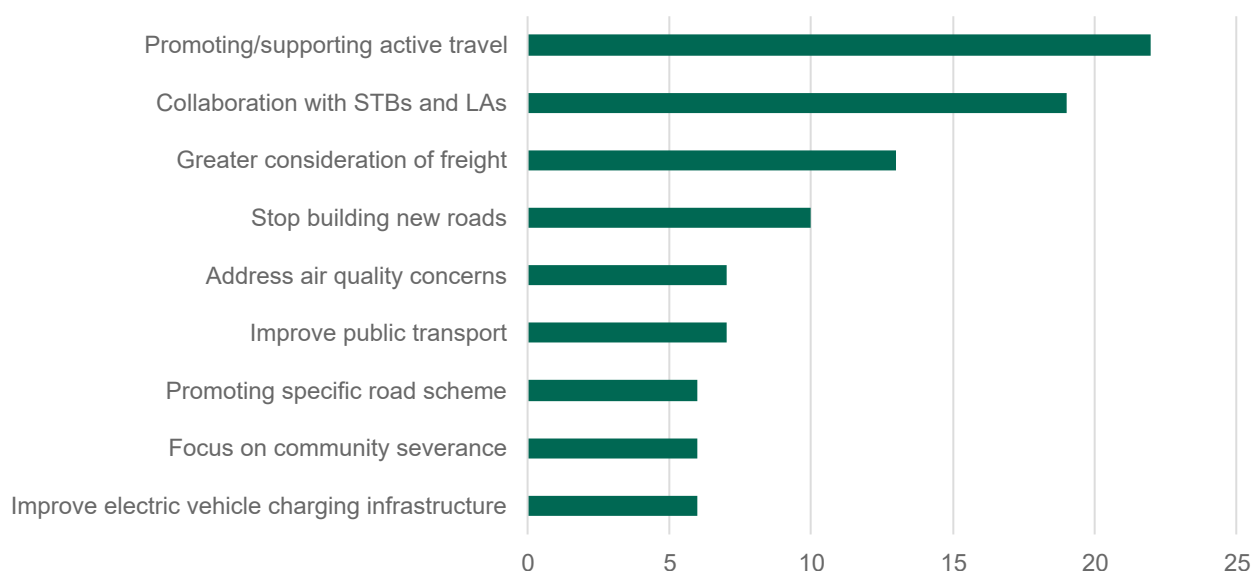
**Table 3: To what extent do you agree or disagree that National Highways should evolve its: Total responses [rounded to the nearest whole number]**



**Figure 10: To what extent do you agree or disagree that National Highways should evolve its: Individuals (left) Organisations (right)**

## National Highways' customer & community offer and proposals for Designated Funds - Common topics

Where respondents disagreed with National Highways' proposed approach, the top nine most common topics that were captured as part of the review of the additional insight and comments to support the responses to this question are set out in Figure 11 below.



**Figure 11: National Highways Customer & Community offer and proposals for Designated Funds - Common topics**

*"We would request that the designated funds are increased to provide greater flexibility and provide an additional focus on mitigating impacts along the Strategic Road Network from small to medium-scale development. We would also want to see a focus of the*

*designated funds on future-proofing the road network for electric vehicles, through increasing electric charging infrastructure including for larger vehicles, such as HGVs."*

*"Customer and community offer would benefit from a specific recognition to improving outcomes for community wellbeing, particularly where affected communities are most impacted by the effects of severance, social exclusion, poor air quality and traffic noise"*

*"Overall, we believe a greater priority needs to be given to users of the SRN who do not use a private motor vehicle and those crossing the SRN. The mentions of improving provision for active travel are welcome, but do not go far enough. We believe greater focus on active travel is needed, with a more strategic approach to delivery that aligns with local walking and cycling plans and networks, improves safety and accessibility. The ambition for designated funding for active travel should reflect this need."*

*"Evolving National Highways' customer and community services: The logistics industry relies on the ability to effectively and efficiently plan freight movements, yet often the unreliability of infrastructure makes this extremely difficult. [We] therefore agrees with the desire set out in the Initial Report to improve and expand the real-time information provided by National Highways. We agree that this should be greater in breadth than simply journey times and should cover planned roadworks, incident and event management and the availability of charging points. We also support the ambition to share far more National Highways data with third parties to enable better planning and investment."*

*"National Highways approach to customer and community services and in particular taking a broader approach to end-to-end journeys is supported. The importance of addressing the legacy impact of the SRN around air quality and noise remain key issues for our constituent authorities..."*

Narrative comments from respondents focussed on the following themes.

#### Customer offer:

**Active Travel:** Responses supported National Highways' proposals to invest in active travel or proposed that they needed to go further. The need to differentiate between different types of active travel requirements across the SRN was highlighted. Many of those responding supported measures to physically separate active travel users from the live carriageway, although it was noted that physical separation isn't always possible, so proactive speed management is often part of the solution. A number of responses mentioned the need for better integration of active travel infrastructure on the SRN with local authority cycling and walking plans, recognising the dependency on local authority funding.

**Freight:** The balance of responses were predominantly in favour of National Highways' proposals in relation to freight or asking that they go further. There was support from stakeholders for increased lorry parking and driver rest area capacity, HGV low-carbon refuelling infrastructure, and for a direct role for National Highways in its provision and implementation. Respondents also said there was a need to ensure that from the beginning of scheme development, there was an understanding of opportunities for freight warehousing and facilities. Others highlighted the role of the SRN in supporting trans-

shipment facilities outside urban areas to reduce HGV traffic in cities and make use of local delivery vehicles with low emissions and direct vision safety features that reduce risks to cyclists and pedestrians.

**Public transport:** Public transport was a common theme, although many observations were focused on the need for greater funding and provision of public transport, often instead of investment in the SRN without any specific comment on National Highways' proposals.

**Road user information:** A number of responses specifically mentioned improved information for the user. Several respondents expressed support for real-time data, and highlighted the value of including planned roadworks, EV charge point availability, incident and event management, as well as delay. Others said that there were many existing sources for this and no need for another; and mentioned the need to avoid digital exclusion. It could be inferred that there was a general recognition amongst respondents of the importance of information and it being readily available to users.

**Autonomous vehicles:** Respondents' views on autonomous vehicles were mixed. Some supported a gradual and pragmatic approach to connected and autonomous vehicles. Some highlighted the value of focussing on specific activities such as infrastructure to support in-vehicle digital services and the needs of specific user groups, such as freight. However, others noted concerns around autonomous vehicles specifically around safety, and urged that there should be greater caution with their inclusion in the general vehicle fleet.

#### Community offer:

A large number of responses either supported the offer to communities affected by the SRN or asked that it go further. Addressing community severance was a particularly common sub-theme with local authorities sharing concerns around focussing on major and complex severance issues. Local authorities expressed a desire for greater collaboration with National Highways in setting Local Transport Plans. Potential areas for increased collaboration included sustainable transport and managing congestion, and integration with other modes. Other respondents referenced National Highways' potential role in supporting greater strategic planning alongside local authorities in relation to sustainable development, for example ensuring that new housing developments are not entirely car dependent, and between National Highways and Active Travel England in relation to supporting active travel.

#### Proposals for Designated Funds:

Responses indicated broad support for the historic use and continuation of Designated Funds. Several respondents noted in their view Designated Funds needed greater funding to meet the scale of community and user needs. The need to respond to a range of environmental impacts of the SRN through the use of Designated Funds was also a common theme. Air quality and noise impacts on communities were frequently referenced, with respondents noting that funding to reduce pollutants should also concern water quality and flooding, light and vibration. Specific examples around the integration with Local Nature Recovery Strategies, and more general support for increased biodiversity connectivity were also cited.



Responses from local authorities and STBs expressed concerns over the complexity of accessing Designated Funds and called for greater transparency on the process as well as monitoring outcomes of the use of these funds more generally. A number of responses welcomed attempts to engage better with local authorities and communities in delivery of Designated Funds but highlighted the need to be more engaged from bidding through to delivery. Others highlighted the need for stability of Designated Funds pots between road periods and the need to avoid competing objectives within the same pot.

### Summary of Sub-national Transport Body views

STBs asked for more action to enable, support and encourage mode shift for freight and car-users – for the purposes of decarbonisation and freeing up SRN capacity. A particular proposal championed by the majority of organisations was that National Highways should proactively fund or contribute to off-network interventions that benefit the SRN by shifting local journeys onto other transport networks, thereby relieving congestion and enabling more strategic trips, especially freight, to be prioritised. Potential solutions included park and ride, improving local roads, mass transit and active travel improvements.

Collaboration through the development of RIS3 by both DfT and National Highways was recognised and welcomed universally but there was a demand for more co-operation and engagement with local authorities and STBs to develop a single and shared approach to planning investment priorities, including smaller interventions. Several STBs felt that investment was planned in siloes and over different time periods. They argued that this led to a series of transport networks that are not as integrated as they need to be to deliver effective end-to-end journeys.

Concerning Designated Funds, two STBs explicitly stated support for the suggested Designated Funds programme pipeline. Common themes for improving Designated Funds included better aligned with local transport plans and planned local growth and greater consideration of active travel.

## Q7.) National Highways' approach to driving decarbonisation and environmental sustainability

The roads sector is responsible for a significant proportion of the UK's domestic greenhouse gas (GHG) emissions, and the SRN has a key role to play in supporting the transition to net zero. The sector can also have a negative impact on the natural environment, and where this is the case, we must continue to make progress to tackle it. A road network where delays are minimised and journeys are smooth reduces emissions from vehicles, in addition to bringing economic benefits.

The government is leading action to reduce tailpipe emissions by driving the transition towards zero emission vehicles, and National Highways recognises its part in the *Initial Report* in supporting uptake of zero emission vehicles, through for example roll-out of charging infrastructure on the SRN, and through its own operations and those of its supply chain.

The *Initial Report* also recognises National Highways' role in demonstrating wider environmental leadership, supporting health and wellbeing in communities adjacent to the SRN, improving ecosystems and conserving and enhancing the natural environment. An



important part of this will be the new legal requirement to deliver biodiversity net gain on Nationally Significant Infrastructure Projects submitted for examination, which is expected to apply from November 2025 onwards, and acting in accordance with the environmental targets set under the Environment Act 2021<sup>5</sup> in relation to air quality and water quality. In parallel, National Highways will deliver a programme of improvements to the existing network and nature-based solutions to support climate resilience. Against the backdrop of the UK's long-term commitments to net zero carbon and improving the natural environment, RIS3 will need to place significant emphasis on the contribution made by the operation and use of the SRN.

The consultation asked for views on National Highways' approach to driving decarbonisation and environmental sustainability on the SRN and the extent to which respondents agreed or disagreed with this approach. There were a range of opinions and insight with a near even split of views. 44% of responses either 'strongly agreed' or 'agreed' with National Highways' approach, while 42% either 'strongly disagreed' or 'disagreed'. More detail is set out in Figure 12 below.

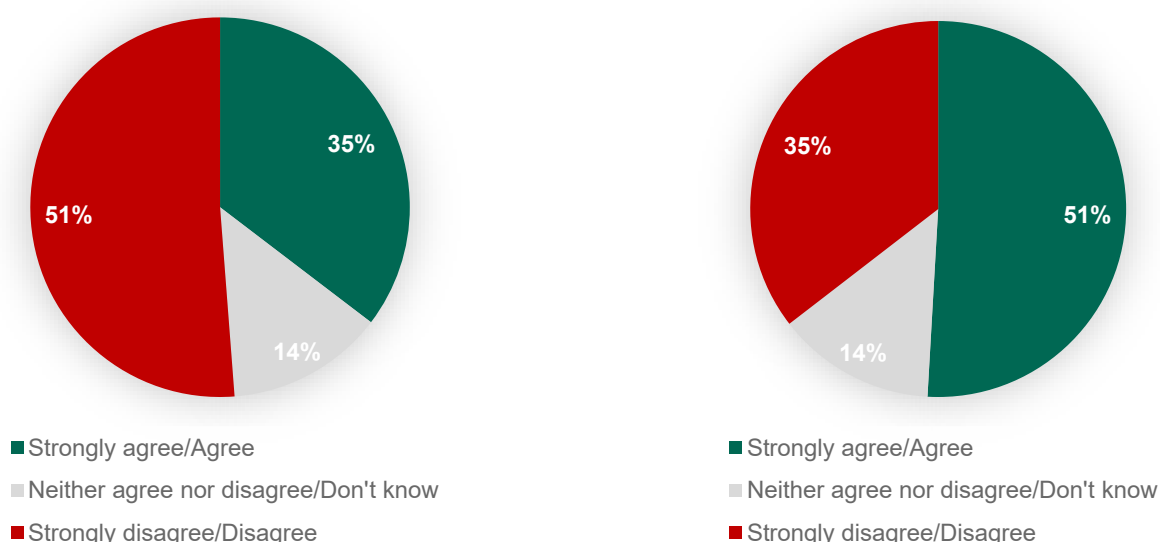
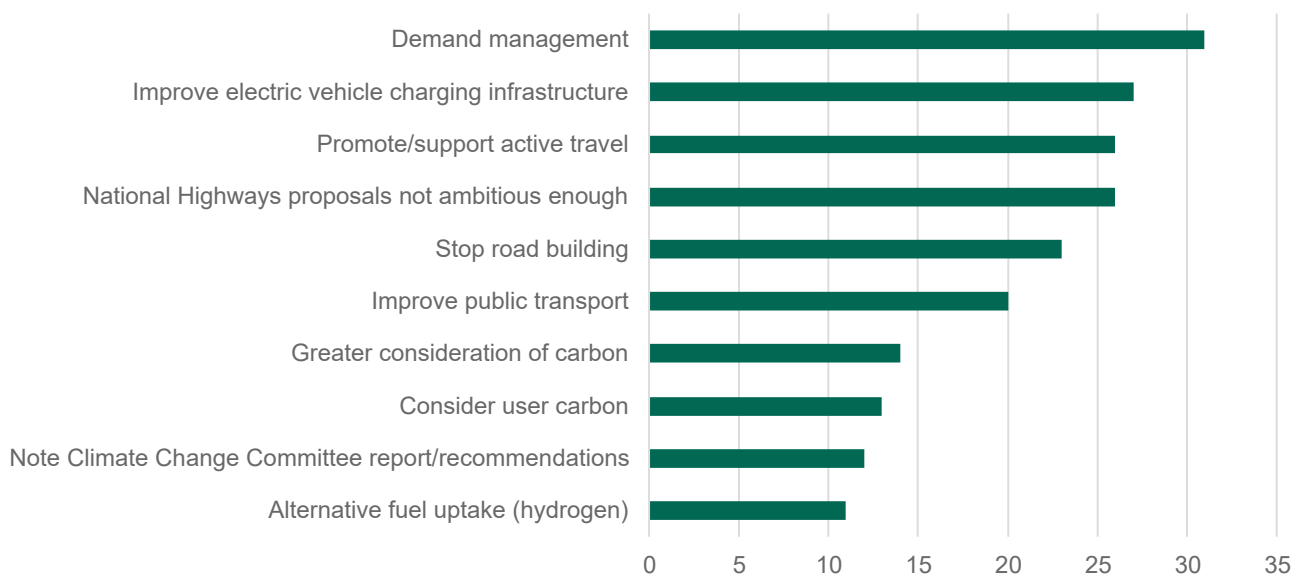


Figure 12: To what extent do you agree or disagree with National Highways approach for driving decarbonisation and environmental sustainability on the SRN? Individuals - 82 (left) Organisations - 110 (right)

### National Highways approach to driving decarbonisation and environmental sustainability - Common topics

Where respondents disagreed with National Highways' approach, the top ten most common topics that were captured as part of the review of the additional insight and comments to support the responses to this question are set out in Figure 13 below.

<sup>5</sup> <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>



**Figure 13: National Highways approach for driving decarbonisation and environmental sustainability - Common topics**

*“[We], welcome National Highways commitment to drive decarbonisation and environment sustainability during the next road period, but we are disappointed that the SRN IR fails to look for or implement innovative opportunities in tackling tailpipe emissions and air quality. We feel that National Highways are on the right path in supporting a step change in construction practices and welcome the PAS 2080 approach. A similar bold approach to incentivise sustainable options for the movement of people and goods should be investigated.”*

*“While we generally support the majority of points regarding decarbonisation of the organisation and operations, we want National Highways to also consider carbon emissions generated by the user of the road network. This should include consideration of end-to-end journeys, and alternative modes of transport in order to help achieve decarbonisation.”*

*“It is essential that decarbonisation and environmental sustainability are an integral part of National Highway’s plan for operations, construction and road users. As a leading organisation in the field of construction in the UK, we will be looking to National Highways to be pioneering and leading best practice on low carbon construction, and to be sharing this experience with local highway authorities. Where offsetting is required to achieve carbon neutral, schemes that directly benefit communities impacted by the SRN should be prioritised.”*

*“To achieve the Government’s decarbonisation targets there is likely to be a need for demand management measures (i.e., making car travel less attractive). The draft document does not acknowledge the need for demand management. As such there is a risk that without demand management and a clear strategy on how behaviour change can be achieved, the amount people travel will continue to increase. This will continue to drive demand for additional capacity on the SRN, particularly if mode shift ambitions do not materialise.”*

*“The Initial Report sets out a proposal of rolling out 2,500 open access rapid charging points across the network by 2030, funded by the governments Rapid Charging Fund from the Office for Zero Emissions. This pace of rollout does not appear to match the demand forecasts for this time period. Details of the provision within RIS3 to further expand this rollout of EV infrastructure investment should be provided. [We] are concerned this proposed expansion will not create the capacity to support the growth in electric vehicles forecast over the RIS3 period.”*

Narrative comments from respondents focussed on the following themes.

**Demand management:** A strong theme from respondents in relation to decarbonisation and environmental sustainability related to introducing an alternative approach for managing and reducing use of the network, through demand management tools. The responses generally recognised this is not something National Highways can implement in isolation but needed a cross-government commitment to supporting modal shift away from private car use to more sustainable modes of transport.

**Decarbonisation and alternative fuels:** As noted earlier in the document, responses welcomed National Highways’ adoption of international standards for carbon management in infrastructure construction (PAS2080). There was a strong perception from respondents that National Highways is not doing enough to recognise road user carbon as a key contributor to UK GHG emissions, and that there should be greater overall consideration of carbon in the company’s plans, and that National Highways should have a more proactive role in driving decarbonisation. A number of respondents proposed a RIS target to reduce user carbon from the SRN.

One of the key themes across the majority of responses was supporting the uptake of zero emission vehicles through improving the availability and capacity of electric charging infrastructure on the SRN, making long distance journeys by electric vehicles easier, and a role in supporting the development of a network of hydrogen refuelling infrastructure for HGVs. A smaller number of respondents considered vehicle fleet decarbonisation in the context of wider transport policy around reducing GHG emissions through demand management of vehicles using the network, and that decarbonisation of the vehicle fleet in isolation does not go far enough, fast enough.

A number of respondents commented that National Highways’ proposals to reduce its own corporate carbon emission and those of its contractors are not ambitious enough, and goals to reduce construction and operational carbon do not go far enough. However, there was support for National Highways’ proposals in the *Initial Report* to adopt international “carbon management in infrastructure” (PAS2080) principles in its future plans and activities.

**Role of public transport and active travel:** Respondents noted the importance of improving public transport in supporting decarbonisation goals. They also highlighted the case for supporting active travel through infrastructure investment and improved accessibility as a direct alternative to adding capacity to the SRN in appropriate locations such as urban areas. Across these responses there was a general consensus that alternative, more sustainable modes of transport should be considered for investment in the first instance as opposed to solely highways-focused interventions predicated on supporting private car use and future traffic growth.

**Environmental sustainability:** Respondents also highlighted opportunities for National Highways to go further on environmental sustainability. This included National Highways striving to achieve no harm to irreplaceable habitats, such as ancient woodlands and ancient veteran trees, in any current or future schemes where possible.

**Future SRN capacity enhancements:** A further view regularly featuring in responses was that road capacity enhancements are inconsistent with supporting decarbonisation, and decisions risk locking in unsustainable levels of traffic growth. As noted earlier in the document, responses proposed adopting a review of current and future schemes in the light of net zero commitments similar to that of the Welsh Government, and in line with the recommendations of the Committee on Climate Change in its June 2023 report to Parliament. Others said that in exchange for reduced road building, maintenance of the existing network should be improved.

### Summary of Sub-national Transport Body views

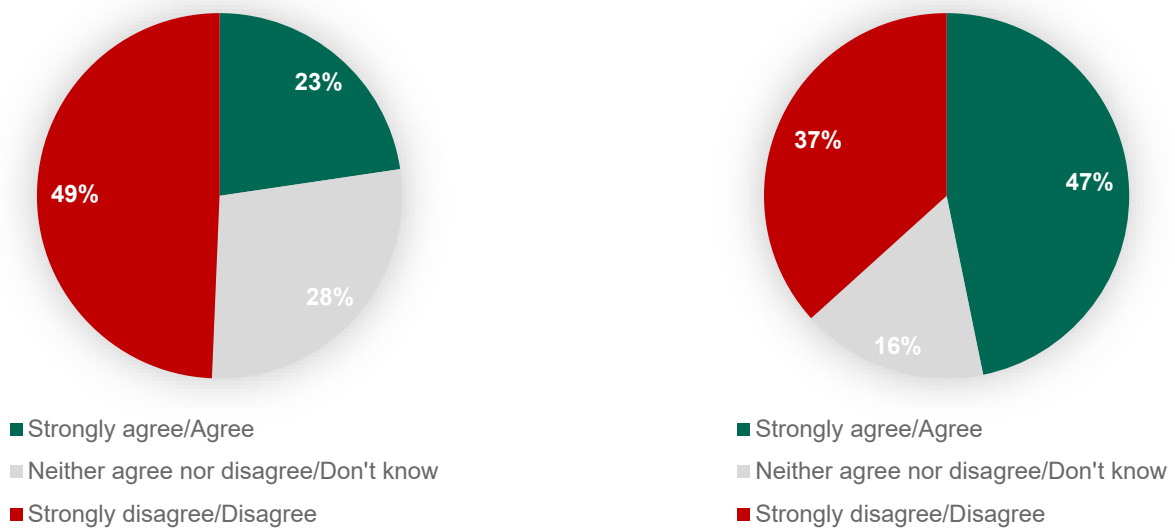
STBs stated a clear view that RIS3 needs to demonstrate more ambition in respect of decarbonising travel on the SRN by both accelerating the move towards alternative fuels, and also by changing travel behaviours through better integration, mode shift and demand management. Whilst they acknowledged and welcomed National Highways' steps towards broader approaches and considerations over the past decade, they felt that RIS3 needed a further step change if the required levels of decarbonisation were to be achieved.

## Q8.) National Highways' approach to its future enhancements programme

Despite the progress already made in RIS1 and RIS2 in the way the network is operated and managed and performance measured, and the enhancements that have been delivered, road users continue to face delays and unreliable journeys when using the SRN. In the current context of high infrastructure cost inflation and with a considerable tail of committed RIS2 scheme spend, completing these projects is likely to be the priority for enhancement spend during the RIS3 period.

Where there is the opportunity for new enhancements, users of the SRN and other stakeholders made the case for an increased priority to be given to smaller, locally focused enhancement schemes in RIS3. These schemes would tackle known issues on the network and bring tangible local benefits helping to enable local and regional growth. They can typically be delivered quickly and cost-effectively, with the benefits realised sooner. They also usually have lower disruption costs than larger, more complex schemes.

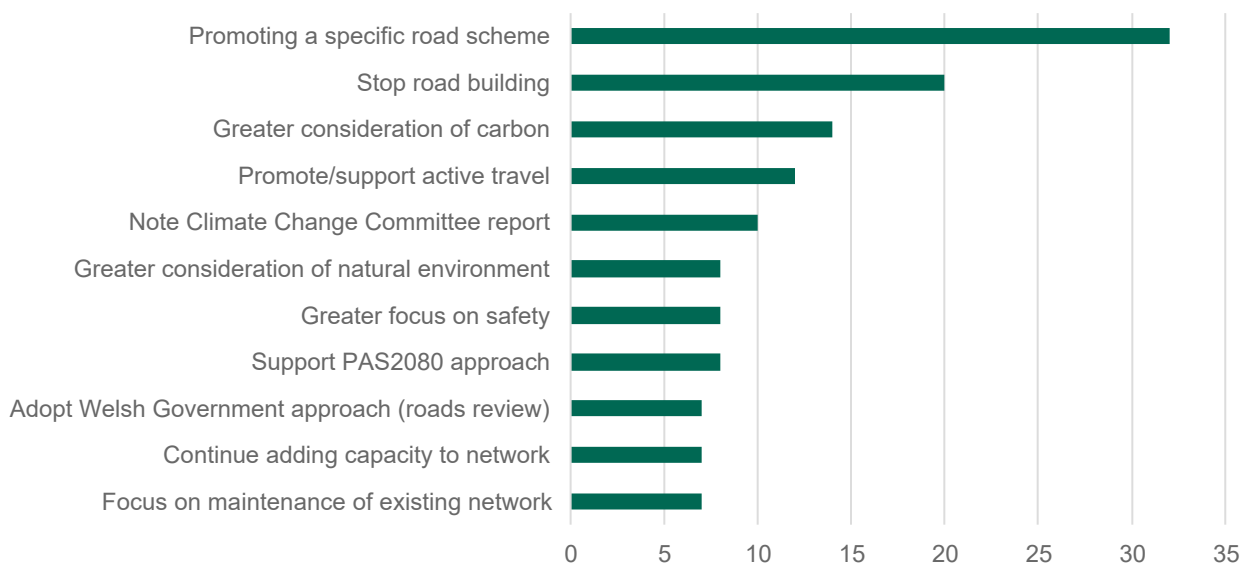
The consultation asked respondents to what extent they 'agree' or 'disagree' with National Highways' approach to future enhancements on the SRN. Of the 184 total responses to this question, there was overall a greater percentage that either 'disagree' or 'strongly disagree' with this proposed approach, comprising nearly 42% of responses compared to 37% who agreed or strongly agreed with the approach. Figure 14 below sets this out in more detail.



**Figure 14: To what extent do you agree or disagree with National Highways' approach for its future enhancements programme? Individuals - 75 (left) Organisations - 109 (right)**

### National Highways proposals for future network enhancements - Common topics

Where respondents disagreed with National Highways' approach, the top ten most common topics that were captured as part of the review of the additional insight and comments to support the responses to this question are set out in Figure 15 below.



**Figure 95: National Highways proposals for future network enhancements - Common topics**

*“[We] broadly support taking a targeted approach to enhancing the network... We agree that in many instances smaller-scale local schemes can help to address bottlenecks on the network and can be delivered more quickly than major projects. As the National Audit Office has previously identified, one issue contributing to delays in the RIS2 programme was the increased number of large and complex projects in the portfolio.”*

*“We support the commitment to assess all options against PAS2080 for managing carbon in buildings and infrastructure, from their construction and maintenance to their use.. We encourage National Highways to consistently apply the PAS 2080 hierarchy to all decision-making processes for all schemes already committed to or under evaluation, to ensure that low carbon solutions to enhance capacity are prioritised.”*

*“Although taking a targeted approach is sensible in principle, the proposed approach appears to rely heavily on delivering small-scale interventions. In some locations, this will be entirely appropriate, but network enhancements can be solutions to complex and often long-standing problems that cannot always be addressed through small scale interventions. If only small-scale solutions are delivered in RIS3, the investment will fail to address some of the long-standing structural challenges for the economy and communities...”*

*“Completely pivot away from building new roads and expanding existing ones. Instead, there should be a focus on renewals of existing infrastructure and safety improvements. In very limited circumstances, build new roads where there is a strong safety case to do so.”*

Narrative comments from respondents focussed on the following themes.

**Larger enhancement schemes:** The most common topic in response to National Highways’ approach to enhancements was support for, or opposition to, a specific enhancement, either committed for delivery in RIS2; identified as a RIS3 Pipeline scheme; or an entirely new scheme. Where schemes received support, the basis of support was primarily to tackle place-based specific pinch points or to improve the overall performance of an SRN route or corridor. Comments opposing schemes highlighted the environmental and community impact of the schemes and future traffic levels on the route. Others considered that in the current context, alternative schemes could provide better investment than existing committed schemes.

Views on future smart motorway enhancements were mixed and relatively few in number. Some respondents supported the cancellation of smart motorway plans, whilst others supported a resumption of smart motorway roll out. A further group supported a modified smart motorway roll out, for example using the hard shoulder only during periods of congestion.

**Small-scale schemes:** Stakeholders generally recognised the rationale for a focus on more targeted, smaller scale enhancements to the network. Some welcomed the potential safety-related ‘quick wins’ of such an approach but considered that they represented a finite opportunity whilst longer-term investment is planned and considered. Others argued for a balance between small scale schemes and larger schemes that tackle long-standing structural connectivity challenges for specific regions or corridors and that small scale intervention should not come at the expense of larger scale investment.

**Climate change and sustainability:** A strong general theme from respondents answering this question reinforced comments made in the climate change and environmental sustainability section of the consultation that road capacity enhancements are inappropriate and inconsistent with supporting decarbonisation, citing the



recommendations of the *Committee on Climate Change in its June 2023 report to Parliament*<sup>6</sup> and the approach adopted by the Welsh Government.

Respondents highlighted the need for greater consideration of the natural environment in enhancement plans and decisions. This included scheme funding taking full account of environmental mitigations in sensitive areas to prevent schemes stalling, and appropriate consideration of additional planning protection associated with environmentally sensitive areas.

**Consideration of local roads and wider networks:** Several respondents highlighted the need to consider local road impacts of enhancement decisions and others noted the need for greater SRN and local road coordination. Without coordination the SRN could operate as a blocker to economic growth and housing delivery, and traffic displaced from the SRN on to less suitable, less safe, lower order roads. Coordination with local authorities was also seen as important at the interface of the SRN and local roads, which can be heavily congested, and creates delays for the 'last mile' of journeys, as well as problems for drivers who need to cross the SRN.

**Active travel and public transport:** Respondents said that greater priority needed to be placed on active travel infrastructure, including segregated cycle lanes. Others supported greater priority for public transport, highlighting specific interventions where investment should be focussed, such as priority bus lanes. A further group said there should be greater emphasis on rail spending.

## Summary of Sub-National Transport Body views

**Certainty of investment plans** was raised by several STBs as critical to enable other local interventions to be planned effectively and also ensure investor confidence in their regions. The cancellation of, or delay to, critical schemes on the SRN was perceived to stymie economic growth by impacting adversely on private sector investment. All STBs said a commitment to committed RIS1 and RIS2 schemes should continue, alongside the naming of new schemes for RIS3, principally drawn from the RIS3 Pipeline.

The proposed approach of a greater focus on smaller schemes to resolve existing safety and congestion issues on the network was cautiously supported, with a degree of scepticism expressed that these would be sufficient to tackle the problems experienced on the network. The STBs wanted to understand the proposals for smaller schemes in more detail, including contributing to decisions on specific locations and solutions. Though all responses recognised the affordability challenge faced by the Government, it was argued strongly that smaller schemes were not an adequate substitute for major enhancement schemes, which were required to facilitate employment and housing growth.

## Q9.) Measuring performance

The *Initial Report* considers how National Highways delivers its vision, including how it must change as an organisation, how it evolves the way it works with its supply chain and

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<sup>6</sup> <https://www.theccc.org.uk/publication/2023-progress-report-to-parliament/>

the outcomes it intends to achieve in the third road period and the shape and nature of the performance framework that will underpin these.

The National Highways performance framework brings together the requirements that it is committed to delivering. This includes targeted key performance indicators (which together with untargeted performance indicators make up the suite of RIS performance metrics) and descriptive commitments. The *Initial Report* summarises insights on the current RIS performance metrics, including refinement of existing measures and gaps where new metrics and targets may be needed.

The consultation asked respondents to rate to what extent they agreed or disagreed with the assessments as set out in the *Initial Report* for the most important performance outcomes to measure. Of the 171 responses to this question, mixed views were received, with 36% and 35% of the total responses agreeing and disagreeing with the proposals respectively. Figure 16 below sets the split of responses out in more detail.

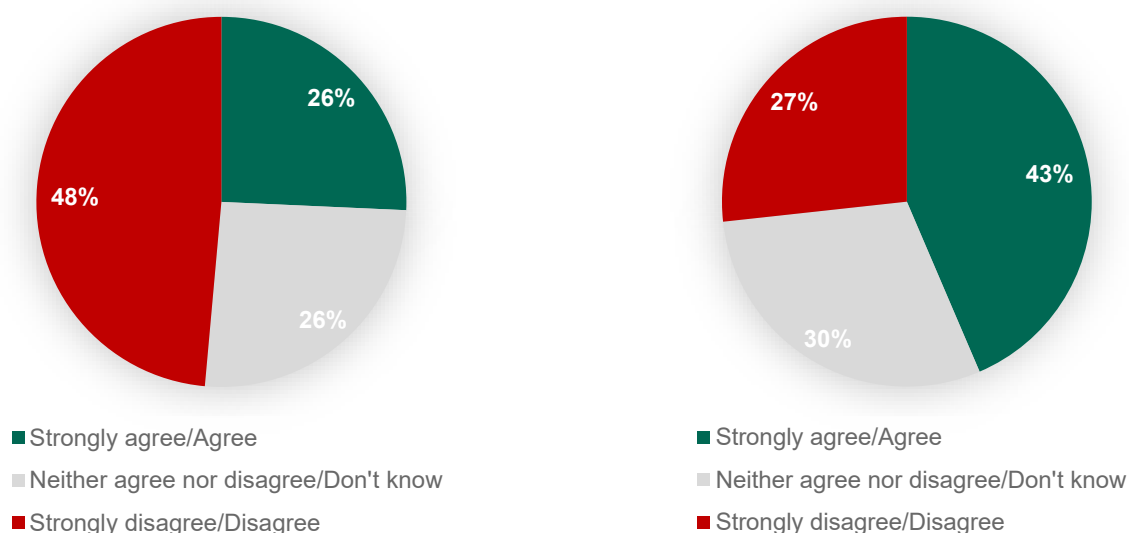
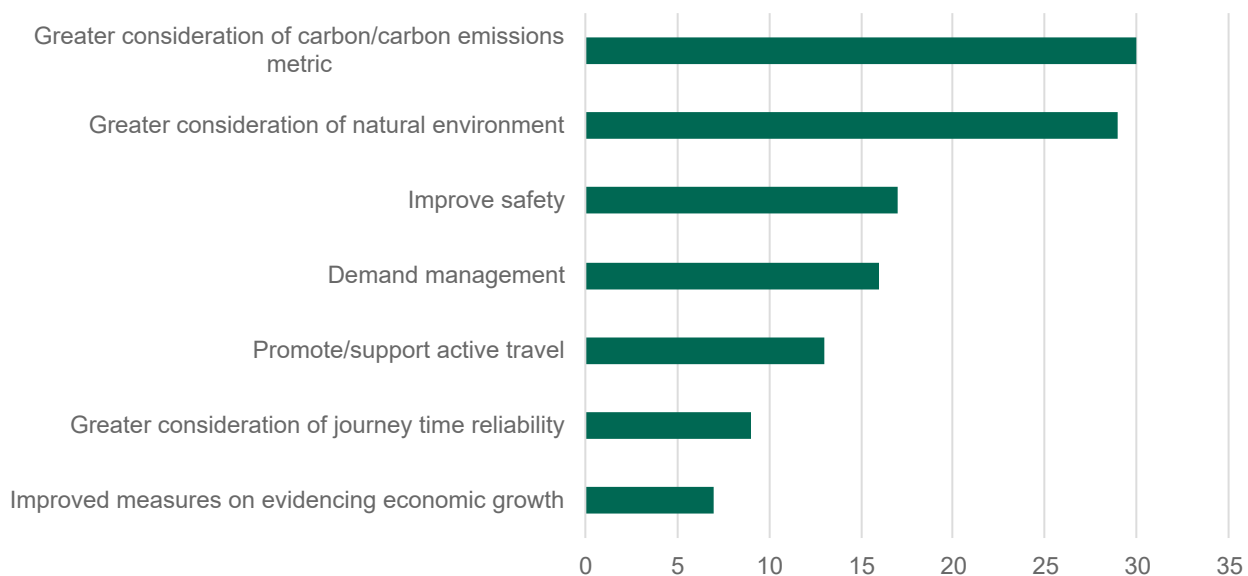


Figure 16: To what extent do you agree or disagree with the assessment in the SRN Initial Report on the most important performance outcomes to measure? Individuals - 70 (left) Organisations - 101 (right)

## Measuring Performance - Common topics

Where respondents disagreed with National Highways' approach, the top seven most common topics that were captured as part of the review of the additional insight and comments to support the responses to this question are set out in Figure 17 below.





**Figure 17: Measuring Performance - Common topics**

*“Performance needs to be monitored against milestones set with regard to achieving Net Zero. They should be customer focused and outward looking rather than focused upon internal National Highways operations. The metrics should be able to monitor the changes required in order to get to Net Zero on the SRN.”*

*“A selection of core KPIs with specific, measurable, targets are welcome though there are some queries as to what the actions for failing to meet these KPIs would actually be. However, the statement that these metrics will continue to be monitored and addressed throughout the RIS3 period and beyond is welcome.”*

*“We support the proposal to update the RIS Performance Framework, in particularly including the need for a carbon metric, an updated biodiversity net gain metric and a performance indicator that supports Active Travel.”*

*“Metrics for water quality improvement need to be quantified to provide clear targets for outfall mitigation by National Highways.”*

*“For an operation so complex, there should be more than 10 targeted KPIs for the whole of the SRN. It seems curious that National Highways would go to the lengths of measuring performance indicators that have no targets. There is the possibility of having further targets associated with performance metrics that would drive action. Currently there are no intermediate indicators of success for road safety that have targets e.g., iRAP star ratings. These are necessary to move the organisation away from ‘business as usual’ activities towards the step change necessary to reach zero harm.”*

Narrative comments from respondents focussed on the following themes.

**Safety:** Comments focussed on the need for additional KPIs, such as a specific non-motorised user metric, reflecting the complex nature of achieving zero harm on the SRN, and the need for intermediate targeted indicators of success for improving road safety.

**Fast and reliable journeys:** Respondents noted the importance of journey time reliability as a performance measure. The link between SRN performance and connectivity was also highlighted, with proposals for a measure that reflected its role in supporting rural connectivity and evidencing the link between the SRN and economic growth.

**Network maintenance and resilience:** Respondents emphasised the need to continue to measure National Highways' maintenance of SRN structures and road surface condition - particularly in rural areas. Other responses noted that a greater priority should be placed on street furniture for example lighting, signage and road markings as an essential part of supporting journeys.

**Carbon emissions and the natural environment:** A consistent theme of responses was the need for a separate performance measure for road user carbon emissions, in addition to metrics linked to National Highways' corporate emissions and its supply chain. Others suggested a metric focussed on reducing demand on the SRN as part of wider modal shift measures, and responses often cited the desire for quantifiable traffic reduction targets to support this aim. Respondents also highlighted the need for a greater consideration of the natural environment, including additional performance measures of natural environment improvement and reduction in ecological severance, improving measures of water quality and outfall mitigation, air quality, noise pollution, and cultural heritage assets to align with sustainability goals.

**Needs of road users:** A number of respondents agreed that the performance metrics needed to be more customer focussed, including greater consideration of freight and a greater focus on connectivity and data use. Other said that greater focus was needed on measuring support for public transport and levels of satisfaction from this group of users, and the uptake of active travel as alternatives to driving. A further group of respondents said that performance metrics should prioritise public transport infrastructure and active travel infrastructure.

**Efficient delivery:** The small number of views on this outcome area focussed on having a stable, transparent, pipeline of schemes which the supply chain can plan for with confidence.

### Summary of Sub-National Transport Body views

There was a commonly shared view that performance KPIs should be customer or outcome focused, rather than focused on internal National Highways operations and that the KPIs for RIS3 should not be limited to ten as proposed in the *Initial Report*. Where KPIs are vague and difficult to measure, several, more detailed, KPIs were needed to address the issue. Equally where outcomes are a legal requirement, a KPI is not necessary. Several STBs noted that performance milestones needed to be set against achieving net-zero, and that metrics should be able to monitor the changes required in order to reach Net Zero on the SRN.

## Q10.) The presence and operation of the network

A core theme running through National Highways' proposals in the *Initial Report* is the wider impacts that the company's operations and the presence of the SRN has on communities adjacent to the network. This includes how the SRN can be a better neighbour by safeguarding the environment, reducing severance, and reducing any significant noise and air quality impacts for local communities. The consultation asked respondents what in their view could be done differently to meet the needs of people and communities affected by the presence and operation of the SRN and 245 responses to this question were received.

### The presence and operation of the SRN - Common topics

The top five topics that were captured as part of the review of the additional insight and comments to support the responses to this question are set out in Figure 18 below.

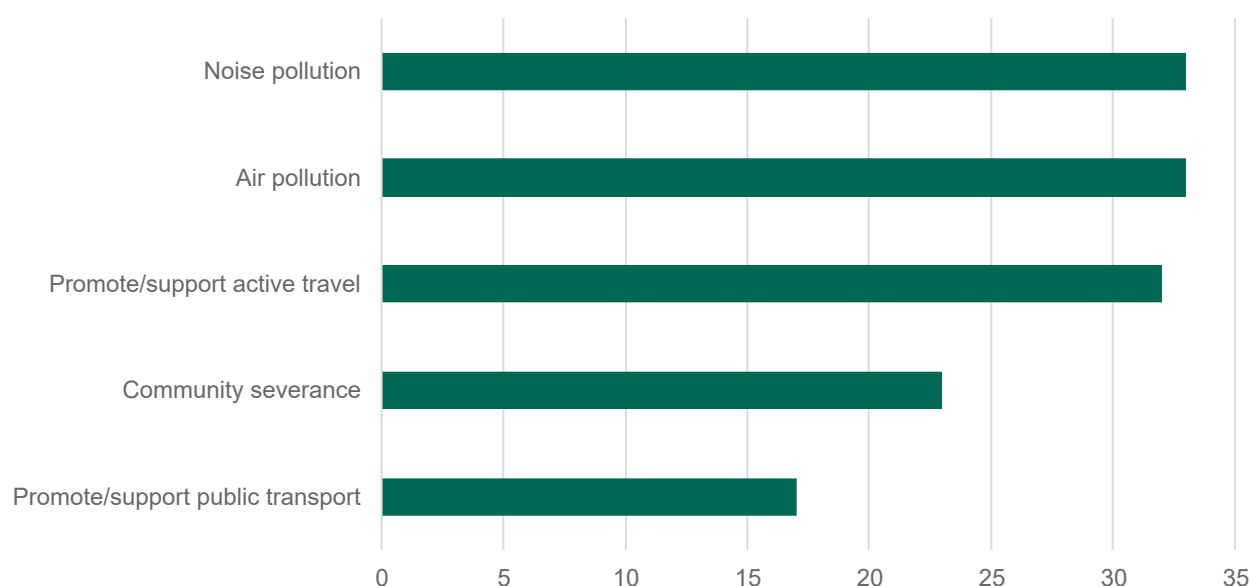


Figure 108: The presence and operation of the SRN – Top 5 topics

*“For those who live/work/are educated on the SRN, lower speed limits and better cycle and walking facility provision are a necessity. It is easy to forget that there are lots of single carriageway sections that go through people’s villages and towns and that these places need to be liveable and safe for those living there.”*

*“Continued strong focus on the impact of noise and air quality on local communities, in particular residential areas. Impact of severance on local communities, particularly where crossing the SRN is a day-to-day requirement of the community. Reliability and consistency of the SRN. Facilities on the SRN including EV and other alternative fuel infrastructure.”*

*“More consideration of the resilience of the SRN, and the negative impacts of displacing traffic onto unsuitable local roads, either temporarily for maintenance or through insufficient capacity on the SRN at pinch points. More resilience in terms of structure as*

*poor weight bearing capacity on the SRN tend to lead to abnormal loads having to travel on unsuitable local roads.”*

*“Greater focus on integration of SRN, MRN and local networks, collaborative work with LTA's on improving and managing SRN diversionary routes, improved integration of communications / traffic management between SRN and local networks.”*

*“There is a real opportunity to go further in providing access to greenspace for local communities and improving their health and wellbeing including through active travel and opportunities for modal shift. Relying on Designated Funds may not be enough to really tackle the issues facing communities.”*

Narrative comments from respondents focussed on the following themes.

**Air and Noise pollution:** Air and noise pollution were two of the most mentioned topics in responses to this question, with the desire for the reduction of both. Respondents suggested taking a more strategic evidence-led and consistent approach to delivering improvements and focussing on reducing pollution at source.

**Safety:** The importance of local communities feeling safe alongside the SRN was a consistent theme among respondents. There was support for speed limits to be reviewed and reduced where sensible in combination with speed enforcement, and for measures that increased safety for active travel and users of public transport (see below).

**Environmental impacts:** Many respondents raised concern about the general environmental impacts of the SRN, both as a result of the volume of traffic using the network, and with regard to its future development and/or expansion. They argued that this would be to the detriment of biodiversity and against the wider climate change and carbon reduction background.

**Active travel and public transport:** Respondents frequently called for improvements to the SRN that supported or enabled greater use of active travel and public transport for nearby communities to reduce pollution and other environmental impacts and support social inclusion. For active travel, proposed measures included measures to improve safety for users, supporting public rights of way along and across the network, and linkage to green spaces. Several responses mentioned that the volume of traffic and/or the design and layout of the network disincentivises active travel and reinforces severance issues created by a road and that future works should look to reverse these.

**Community severance:** Severance was a key theme raised in its own right by both individuals and organisations, who wish to ensure that communities are not separated by the presence and operation of the SRN, but are instead connected to local services, education, health, leisure and/or work, and with safe access to active travel and public transport. Safe speeds and safe crossings were identified as aspects that can help improve connectivity, together with the impact of the SRN on traffic flows on local roads.

**Integration of the SRN with the MRN and local roads, and diversionary routes:** It was widely felt that there should be better integration of the SRN with both the MRN and local road network, both from an operational, traffic management perspective and a planning/future development perspective. Respondents particularly highlighted the

challenges for communities when traffic is re-routed due to incidents on the SRN or by short or longer-term maintenance/roadwork-related diversions. Several comments referenced technology and were supportive of its further development and use. Examples include using it to manage traffic flows particularly where there is an incident on the SRN and joining up with local authorities to help better manage diversions.

**Technology:** Technology was seen as a key enabler for most of National Highways' aims to improve the operation and presence of the SRN. Though often not detailed in the responses, there was a general recognition that technology had an important role to play in providing better access to information for users, and in supporting National Highways to understand its network assets and their impacts on communities.

### Summary of Sub-national Transport Body views

Responses from STBs focussed on National Highways' work with local authorities to reduce the impacts on the SRN on local communities. STBs often noted the benefits of improving public transport across the network, as well as safer active travel infrastructure. One STB noted that heavily congested roads that go through sensitive areas such as National Parks in its region greatly undermine the quality of life of residents through pollution and severance. Other STBs urged for greater engagement with local highway authorities when planning diversionary routes.

## Q11.) Digital technology

Digital technology and its application touches on all aspects of National Highways' operations and is consequently referenced throughout the *Initial Report*. The consultation asked respondents whether they believe that National Highways' approach to digital technology puts the organisation on the right track for meeting its vision for 2050. Of the 176 total responses to this question, there was a near even split of responses stating they either believed National Highways were on the right track, or were not on the track, or that they didn't know. Figure 19 sets out the composition of responses in more detail.

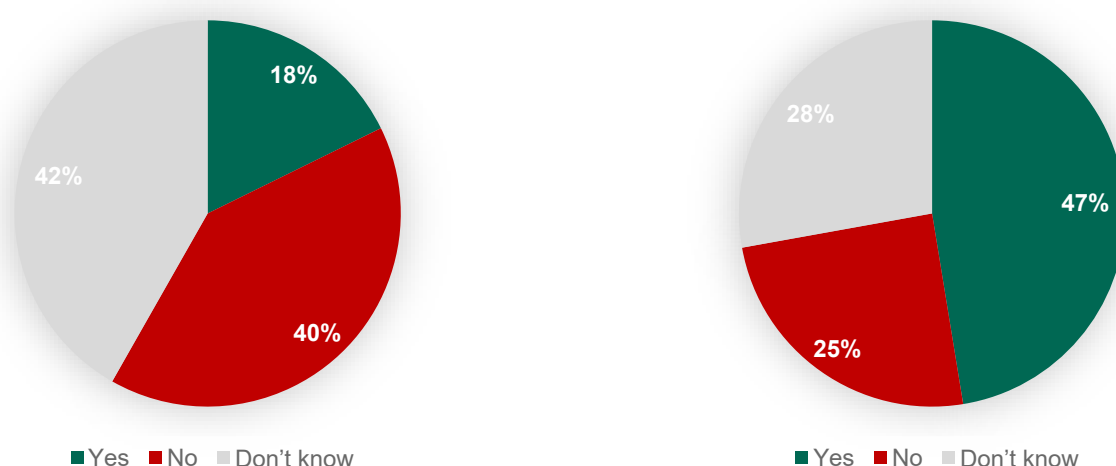


Figure 19: Do you think the approach to Digital Technology set out in the SRN Initial Report puts National Highways on the right track for meeting its vision for 2050? Individuals - 79 (left) Organisations - 97 (right)

## Digital Technology – Common topics

Where respondents disagreed with National Highways' approach, the top nine topics that were captured as part of the review of the additional insight and comments to support the responses to this question are set out in Figure 20 below.



Figure 2011: Digital Technology – Common topics

*“[We] agree that digital technology can support the reliable, fast, efficient and safe running of the SRN network and welcome the proposals. [We] would like to ensure join-up in digital technology for end-to-end journeys as many journeys that use the SRN also link to the local MRN. We want to ensure any digital technology complements the complete journey and not just that on the SRN and feel this can be done through effective engagement with local authorities and STBs.”*

*“[We] believe that National Highways can and should be more ambitious in their approach and objectives with respect to digital technology. Our primary concern is that the [initial report] as it stands, fails to recognise and articulate the pathways where digital, data and technology will bring about the transformation of the SRN that was set out in the Digital Roads Strategy. There are elements of digital, data and technology set out across all five of the targeted proposals, but there is no single proposal that leads on managing the operational and organisational requirements to support the transformation to Digital Roads.”*

*“Rightly or wrongly, public confidence in the use of technology has been damaged by smart motorways. National Highways needs a much more ambitious strategy to explain the benefits of digital technology.”*

*“We fully embrace the advantages and improvements that the right digital technology can bring to National Highways operations and construction. We are supportive of a technology-led future, and we are encouraged that National Highways are pushing this forward. We think that there needs to be faster roll out of real time information, to create*



*an environment where network users trust the information provided and do not feel the need to use other information sources, which creates risk, that provide more trusted, live, relevant information which NH do not currently provide.”*

*“We note the gradual approach taken towards automated vehicles and consider this to be sensible and pragmatic given the uncertainties of technology and driver behaviour. Greater use should be made of existing and tried and tested technology and especially through better information and messaging.”*

Overall, respondents to the consultation were less interested in the development and application of technology as a strategic objective in itself but recognised it as an important lever for positive change users of the network would like, particularly beyond RIS3. Narrative comments from respondents focussed on the following themes.

**Smart Motorways:** Broadly, respondents expressed concern around the safety of these stretches of road and welcomed the decision to stop smart motorway rollout. Some said that those smart motorways already existing should be removed. Others saw smart motorways as an example of how technology had been relied upon too much or implemented too soon, and that had undermined public confidence in digital solutions on roads. A further group, whilst supporting the stopping of smart motorway roll-out, noted that we must keep looking to the future to ensure additional capacity-enabling advances are embraced.

**Connected autonomous vehicles:** Some respondents expressed wider concerns around the safety of digital technology and the risk of overreliance. This included concern around the reliability of technology, autonomous vehicles and automated lane keeping. Others noted that safety-critical issues with technology must be addressed and adjusted if they become apparent, as a priority.

**Demand Management:** A number of respondents noted demand management in the context of technology. Some noted the use of technology to help inform user choices in the short term, for example greater access to live information and messaging as an indirect tool to influence patterns of demand on the network.

**Using technology to support wider RIS3 objectives:** Respondents highlighted a more extensive role for, and new applications for, technology across many of RIS3’s strategic objectives. This included speed-limiting and geofencing which could reduce congestion and improve safety; monitoring of asset condition; and measuring biodiversity. Respondents also saw a greater role for technology in areas that could benefit most from infrastructure improvements, particularly active travel, where patterns of usage and issues affecting users are less well understood. The role of technology in informing better user choices was also raised in responses. Live data and real time data was already available, and National Highways’ focus should be on successfully integrating these into its activities. Others highlighted that the unintended consequences and potential exclusion of users with differing capabilities in using technology needed to be considered.

**Integration:** Some local authorities noted the need for technology on the SRN to benefit and support integration, for example through ensuring that digital investment supported end-to-end journeys for users including any portions of local roads, particularly the MRN.



Overall, respondents to the consultation were less interested in the development and application of technology as a strategic objective in itself but recognised it as an important lever for positive change users of the network would like, particularly beyond the third road period. Respondents also cautioned against over-reliance on technology.

### Summary of Sub-national Transport Body views

There was widespread support among STBs for the development and deployment of new technologies that could support increases in capacity, network management and better information to customers supporting informed user choices. Digital technology had the potential to deliver significant improvements, however, dependency on this approach could result in putting off difficult enhancement decisions. For RIS3, the predominant view expressed was for RIS3 to make better use of tried and tested technology on the network.

There was general support for the cancellation of the smart motorways programme until such time that the issues raised could be resolved. However, it was noted that the congestion issues on those sections of the SRN continue to persist and urged alternative interventions to be developed and delivered.

## Q12.) RIS3 Equality Impact Assessment (EQIA)

The Equality Act 2010<sup>7</sup> promotes a fair and more equal society. It promotes good relations between people with different characteristics, prohibits discrimination and protects individuals from unfair treatment. Under the Act, public bodies including DfT must comply with the Public Sector Equality Duty (PSED). The PSED helps the Department to carry out its core business more efficiently and helps improve transport for the user.

The PSED requires public authorities to have due regard to the need to **eliminate discrimination, advance equality of opportunity** and **foster good relations**. These are commonly referred to as the three aims of the PSED that decision-makers must consider alongside the nine protected characteristics under the Act.

As part of the consultation, we asked respondents to provide any evidence or other insights they could supply to support the ongoing development of our equality impact assessment for RIS3. A range of views were shared to support this work from organisations and individuals, with some the key points including but not limited to:

*"RIS3 must consider those people who do not have a car (particularly the most vulnerable in our society). Many of these people can be impacted by the developments in their areas (particularly the various types of pollution) despite not owning a vehicle themselves."*

*"The RIS EIA should apportion an appropriate weighting to the EIA impact in the same way that scheme benefits are quantified and captured to justify and prioritise investment."*

*"An appropriate EqIA must allow for the consideration of the likely impact of the work of NH on different population groups including likely disproportionate impacts on persons"*

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<sup>7</sup> <https://www.legislation.gov.uk/ukpga/2010/15/contents>

*from protected characteristic groups and those living in communities experiencing deprivation."*

*"...Any EIA must recognise that for RIS3 to support greater equality, diversity and inclusion it must also be a network for other users of transport, namely public transport and active travel. RIS3 must also ensure investment and action helps to close the transport accessibility gap..."*

*"...Air & noise pollution affects poorest and minorities most. Poorest don't have cars. Need to encourage public & active transport..."*

Throughout the process of developing the RIS, starting in the evidence gathering phase, we have been considering the impacts and benefits of RIS3 for users of the SRN, those who live and work near to it, and those otherwise affected by it. The range of insights received as part of the consultation will be essential in supporting the continued development of the Equalities Impact Assessment, which will in turn inform development of the final RIS.

### Q13.) Analytical approach

Analysis is a complex and important part of how we gather and utilise evidence as part of the development of RIS3. The department's analysts are working closely with colleagues in National Highways to ensure there is a sound, well-understood evidence base available for both organisations to draw on through the decision-making process. Alongside this consultation we have also published a strategic outline of the approach we are taking on analysis for RIS3<sup>8</sup>.

Our aim is for relevant, robust, and trusted analysis to support decision making in all key RIS3 areas. Analysis that provides sound information that can be relied upon when forming decisions, and where policymakers, analysts and key stakeholders have confidence in the methods used to produce the results.

Our strategy describes the analytical platform we have in place to support the development of RIS3 and summarises our analytical approach for assessing different types of RIS3 investment working with National Highways, the Office of Rail and Road, and Transport Focus. It also explains how investment appraisal takes account of the interests of users, as identified by Transport Focus. In addition, it sets out how we are working to develop our appraisal methods and models compared to RIS2m, including in the following areas.

**Environmental Impacts:** Addressing our environment key aim for RIS3 demands a good understanding of how the decisions we make can reduce environmental impacts and improve environmental assets and services, such as natural capital, biodiversity, air quality, emissions; and reduce noise and water pollution. To support decisions by Ministers, an environmental principles policy assessment has been undertaken alongside the draft RIS and will be updated for the final RIS.

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<sup>8</sup> <https://www.gov.uk/government/consultations/shaping-the-future-of-englands-strategic-roads/analysis-to-inform-ris3>

**Traffic demand forecasts:** Updating our traffic demand forecasts to ensure analysis is based on the latest assumptions.

**Uncertainty:** There is considerable uncertainty about how the transport system will evolve in the future, particularly with the potential for emerging trends in behaviour and technology to drive significant change over time. RIS3 demands improving our approach to understanding and communicating uncertainty.

Finally, our analytical approach sets our assurance system for ensuring RIS3 analysis is robust and trusted. We have put in place a carefully considered approach to assuring the analysis, tailoring the level of assurance based on the complexity of the analysis and the decision it will inform. This involves multiple lines of assurance across the organisations and includes the use of internationally recognised external experts for technically complex RIS3 analytical products. We believe the approach we have developed is fit for purpose, and advances analysis for RIS3 in line with the DfT's appraisal development strategy.

The consultation sought feedback from respondents on the content of the draft analytical approach document, and 96 responses to this question were received. The feedback touched on a range of subjects and offered a variety of views.

The most common theme among responses focused on greater collaboration between transport bodies, local authorities and other stakeholders in the development of analysis. We will continue to ensure we collaborate with key stakeholders throughout the process and take onboard lessons for the remainder of RIS3 development and beyond. Several responses expressed a desire for transparency in analytical methods and results.

Other responses addressed traffic forecasts used in the analysis, with several questioning the use of National Road Traffic Projections 2022 and the assumption that traffic will continue to grow.

A number of responses questioned how different modes are considered on a consistent basis in the analytical work, as well as questioning how environmental impacts are considered.

*"There is a need for an enhanced role for Sub-national Transport Bodies and Local Highway Authorities who often have a lot of useful data which could support the NH analysis."*

*"Our main concern around the analysis is that it will rely on the DfT Transport Analysis Guidance (TAG), to inform investment decisions. Whilst we can't expect this to change in time for RIS3, TAG has always had shortcomings when calculating the intrinsic value of freight movements and onward economic impacts of delays or failure to deliver...We would welcome further discussion with DfT on how this could be improved to properly calculate the catalytic economic impacts of disruptions on the SRN, and better inform investment decisions."*

*"It is important that NH collate better evidence on the need to support large infrastructure projects across our region. The Combined Authority, alongside the Sub National Transport Bodies and other interested groups, have undertaken a significant*

*amount of work to progress options and plans over recent years and it is important that NH take account of this in analysis and evidence gathering."*

*"We are happy to see a pledge towards using a 'Decide and Provide' approach, however there is a concern that being built on trend/horizon scanning, the 'future needs' identified will lead back to simply building to meet predicted demand, rather than active demand management. Being beholden to 'future needs' needs to be tempered with an active push towards adjusting traffic levels to meet goals."*

*"We strongly support the enhanced analytical approach set out for RIS3, and the commitment to create a line of sight between investment and outcomes that customers care about. It is important to increase understanding of the impacts of interventions on road users and the quality of their journeys, with a particular focus on operations, maintenance and renewals expenditure. We are keen to continue working with the Department on the development of performance metrics such as journey time reliability to more directly reflect how road users consider aspects of their SRN journey."*

Our analysis will continue to be based on the sound application of the DfT's comprehensive appraisal framework, outlined in Transport Appraisal Guidance<sup>9</sup>. This will include robust assessment of economic, environmental, and social issues. In addition, our Objective Impact Analysis will look at the impact of interventions of DfT's RIS3 strategic objectives and whether they are cost-effective in achieving these objectives.

We believe the approach we have developed is fit for purpose, and advances analysis for RIS3 in line with the DfT's appraisal development strategy. We will continue to work with National Highways to refine and update our analysis, based on the feedback received through the consultation, so that it is up-to-date and robust through to the publication of RIS3.

### Summary of Sub-National Transport Body (STB) views

Several STBs expressed a concern that the demand forecasts used for RIS3, derived from the National Trip End Model (NTEM), were incompatible with the Government's decarbonisation objective. It was further highlighted that NTEM does not reflect local plans for housing and employment and was therefore blunt as a tool.

STBs also argued that National Road Traffic Projections (NRTP) are substantially higher than that assumed by the Climate Change Committee (CCC) and supported the CCC recommendation that scheme appraisal should not rely on the NRTP core scenario.

There was also a call for a greater emphasis on the strategic case in investment appraisal, greater weight being given to wider social and environmental needs, and consideration of a broader combination of interventions and benefits. For example, how off-network investment can provide solutions to remove traffic from congested parts of the SRN.

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<sup>9</sup> <https://www.gov.uk/guidance/transport-analysis-guidance-tag>