

7th February 2018

Dear Mr O'Sullivan,

Shaping the future of England's strategic roads (RIS2)

CPRE Herefordshire is an environmental charity that campaigns to retain all that is best in rural Herefordshire, whilst supporting farming, rural business, the building of sustainable communities, rural transport and affordable housing within the wider infrastructure needs of the countryside. While we welcome

- the opportunity to contribute to this consultation and attach our 2017 comments on the *Midlands to Wales and Gloucestershire Route Strategy* so that these can now be included in the consultation responses and
- that the environment remains one of the five aims for Road Investment Strategy 2 (RIS2)

We would respectfully disagree

- with the assertion that the strategic road network is the largest and single most important piece of infrastructure in the country. We suggest that water supply, sewerage and sewage treatment, power transmission including the internet and hospitals come well before roads in man-made infrastructure and that is even before green infrastructure is considered. This last item should be higher up scheme objectives. Section 1 below explains why.

And are concerned that

- despite spending a considerable amount of time studying your extensive evidence base it is still unclear to us precisely what balance you are proposing between competing priorities, if this is changing from RIS1, the sums of money you are seeking for each priority or the total amount of road building being considered for RIS2.

SUMMARY ANSWERS TO YOUR QUESTIONS

Q4&5 – NO, we do not think the proposals will deliver what users of the SRN want

In Section 4 below we argue that the current definition of users is too restricted and, in Section 3 that the proposals risk being diluted by focussing investment in non-priority parts of England

Q6&7 – NO, we do not think that the proposals will deliver what businesses want

This question is too broad. In Section 3 below we argue that you should focus only on strategic, national economic business types and the geographical areas where your chances of improving matters are highest.

Q8&9 – NO, we do not think that the proposals meet the needs of people affected by the presence of the SRN.

In Section 4 below we argue that their needs are largely ignored and that they are effectively excluded from this decision making process

Q10, 11 & 12

YES we agree with the high level of the proposals for future studies. See paragraphs 3.2 below

NO we do not agree with the proposals for the local priorities fund (paragraphs 2.1 and 2.4 below) or the performance measures/targets (paragraphs 1.3, 2.3 and 2.5 below)

We have NO VIEWS on the proposals for road categories and the development of expressways, the infrastructure priorities or the investment priorities

We have VIEWS both for and against the operational priorities and designated funds as currently expressed. Please see paragraph 1.5, Sections 2 and 4 as well as paragraph 5.3 below

Q13&14 – we have no views on these

Q15 In terms of your five aims

Economy (4/7). Section 3 below urges you to focus on where investment produces the most benefit and not to dissipate your efforts

Network capability (3/7) In terms of meeting future needs and supporting growth for the long term Section 3 below explains why

Safety (3/7). Section 5 below explains why we do not believe RIS2 as currently envisaged will address the issues of safety in an effective and proportionate way

Integration (2/7) See paragraphs 2.5 and 2.6 for what more you could do locally

Environment (2/7) See Section 1 below for what you could do better

Q16&17 – YES, we do think that there should be changes to the roads included in the SRN see paragraph 6.1 below.

Q18&19 - YES, see paragraphs 1.6, 2.3, 2.4 and 6.2 below for additional things you should consider when making decisions about investing in the SRN

Q20&21 - NO, the analytical approach taken does not have the right balance. You need to improve the way you deal with people and communities affected by the SRN and, focus any new schemes on where they might actually produce the greatest economic benefit and pay even more attention to the environment. See Sections 3 and 4 below

The natural environment

1.1 Despite the environment being one of the Government's five aims for RIS2 post 2020 (*Initial Report* page 46) we still feel that insufficient attention is being paid to the environmental impact of roads and that the environment generally should be given significantly more weight in RIS2 and beyond than is currently being proposed. We note that one of the seven challenges for RIS2 and its successors is to 'work more harmoniously with our environment' and that this involves 'making a positive impact on the environment, surrounding landscapes and local communities'. Unfortunately we cannot see that any major road building in rural Herefordshire will succeed in meeting this challenge. Any extension to the Strategic Roads Network (SRN) through the county cannot possibly 'work more harmoniously with its surroundings or deliver an improved environment' since by definition it would be a new addition inserted into the landscape with very direct local impacts and more widely dispersed improvements, if any.

1.2 Landscape is not just about visual impacts. In this connection we would like to draw your attention once again to the findings of the 2017 national CPRE report "*The impact of Road Projects in England*" that we summarised in our attached letter. It would appear that this critique has been accepted at least in part. We note that the *Initial Report's* section on maintaining the SRN proposes action to restore the 'soft estate' for which you are now responsible 'to deliver landscape and heritage objectives as well as supporting bio-diversity'. CPRE Herefordshire welcomes restorative action which accords with our view that there is plenty of scope for improvements along the existing SRN before additional works cause new problems.

1.3 Mitigation hides the fact that damage is done in the first place and runs the very real danger of casually accepting that there will always be a loss. Aiming for an overall positive environmental impact hides this fact. The exporting of air, light and noise pollution into Herefordshire's tranquil countryside by creating new roads is simply not sensible. Significant efforts should be made to eliminate these at source first. To this extent addressing environmental impacts through designated funds could be seen as cosmetic 'greenwash'. We will wait to see more details of the amendment to the existing environment fund to make it a more holistic in scope covering human health and well-being as well as the natural, built and historic environment before commenting further. The lack of clarity at this stage is clearly a worry.

1.4 The loss of bio-diversity is quite correctly identified as a widespread national issue but despite a separate *Bio-diversity Action Plan* your *Initial Report* hides this away within one of the 9 future

challenges for Highways England – the need to reduce the impact and increase the resilience of the SRN. This does not inspire complete confidence in Highways England’s environmental credentials or intentions. Herefordshire’s rural nature means that its bio-diversity is particularly special and in many cases includes relatively large proportions of what is rare or extinct elsewhere in England. Our good fortune does not mean that it should be reduced by new roads simply to increase the resilience of the existing SRN or reduce its impacts in other areas by diverting traffic or providing bypasses. As the *Biodiversity Action Plan* acknowledges ‘roads have the potential to compromise the quality of the environment, fragment habitats and destroy sensitive landscapes.....roads should not add to the pressures recognised in this Plan’.

1.5 We agree with the Campaign for Better Transport’s view that RIS1 failed to deal adequately with the impact of the SRN and other roads on the environment – CO², air pollution – as well as biodiversity and would hope that lessons have been learnt and advice heeded so that RIS2 will truly improve the situation. Reassurances need to be given that the importance of air quality improvements implied by changes to the designated funds is not being diminished. We support the introduction of more charging points for electric vehicles (*Initial Report* 5.1, p69) along the SRN through Herefordshire particularly at locations like the approaches to Ross on Wye, Hereford City and Leominster from where people can walk, cycle or use public transport to reach their final destination. We would urge you to work with Highways Authorities nationally to introduce a scheme where parking charges are removed, or significantly reduced at such points. Using either the proposed wellbeing and environment or the innovation and air quality dedicated funds to assist joint projects such as charging point based clean air zones and to promote modal shift would have our support

1.6 As the *Biodiversity Action Plan* makes clear Highways England needs to be aware of the public’s work on biodiversity and this means engaging with local communities. Many Herefordshire communities have produced Neighbourhood Development Plans (NDP’s) or are in the process of doing so. This is partly a response to national and particularly county wide planning policies which are totally inadequate when dealing with our diverse rural issues. While NDP’s do not generally deal with significant transport schemes they do often contain important environmental information. CPRE can demonstrate that this is often more recent and additional to that held by the County Records Centres. We commend NDP’s to you as both an additional data source and as a way of connecting with local communities upon whom your operations are likely to impact.

Priorities and Funds

2.1 The inclusion of a balanced programme as one of your eight foci for RIS2 should not mean that each region gets its share. If building new roads really can be justified then scarce resources should be directed to where they produce most benefit. Although your sections on enhancing the network include ‘addressing local priorities’ as one of seven areas of work, local priorities as explained in para 5.3.8 of the *Initial Report* are not the business of Highways England in our view. We do not believe that there is a robust case for making any new connections around Hereford or other of the county’s towns which might fall within the types of investment priorities described in the *Initial Report*. (p91) It is neither in the strategic nor national interest to make major changes to the strategic road network in Herefordshire.

2.2 Another concern is the renewed focus on small regional schemes to address safety and congestion hot spots. We actually believe that the continuation of a dedicated small schemes fund – with no certainty about which schemes might come forward at present – will work against a balance. It also works against local councils and communities in rural areas who will have less than five years notice of potential new road schemes. It is regrettable that your *Initial Report* only contains the schemes to be carried forward from RIS1 (assuming that these still represent value for money in a rapidly changing world) and those fifteen that the government has particularly asked you to

examine. This raises the very real fear of schemes emerging from behind closed doors to the very real exclusion of rural communities and their representatives.

2.3 If 'building a pipeline of schemes must involve local communities' as your *Initial Report* states (5.3.10) then RIS2 should include lists of potential medium sized and small schemes at the very least. The active engagement with communities in these localities is vital before this list is produced and published. Too often in the past consultation has been at the point when a preferred solution has already been developed and maybe routes chosen rather than when an issue with the SRN begins to be addressed and various solutions are to be considered – including taking no action. You are concerned to 'avoid the dangers of premature announcements before the right information is available' but actually not being open at an early opportunity is just as damaging. In short we believe that the performance of the SRN must be measured in terms of the level of service it provides to all users and to the communities affected by it and not just drivers.

2.4 It is unclear to us how the five funds proposed in 5.4 of the *Initial Report* together with the fund for local priorities (5.3.8) match the various other suggestions – sufficient funding for medium sized schemes, focus on small regional schemes etc. – in the report or indeed how much you are actually seeking in each case. Whatever decisions are taken by Government on the number, scope and scale of the designated funds you propose we agree that there is an opportunity to improve how they are administered in future. While we do not necessarily agree that the model of joint working adopted for the housing and growth fund is inclusive enough; the idea that environmental groups or non-motorised user groups could suggest proposals or bid for funding is to be welcomed. This would certainly allow pilots of active travel methods and as we have said earlier better outcomes may well come from taking the opportunity to commence planning and stakeholder involvement earlier.

2.5 Furthermore by advocating that sufficient funding should be made available for medium sized schemes during RIS2 there is a danger of detracting from action to reduce demand for road usage or alternatives to cars and heavy goods vehicles. To this extent we agree with the Campaign for Better Transport's proposal in *Rising to the Challenge* that one of Highways England's aims for the RIS2 period and beyond should be to reduce traffic on the SRN. Locally the "Destination Hereford" (2016) results described in our attached comments on the *Midlands to Wales and Gloucestershire Route Strategy* demonstrate how a small amount of money compared to the costs of most road schemes (<£5m) actually achieved a reduction in car usage in and around Hereford from 66% to 62%. This shows that capacity issues can be addressed by ways that do not involve road building through the countryside surrounding places like Hereford. Nationally car travel per person has been falling since 2002 as the National Travel Survey shows and a recent Association for Consulting and Engineering (ACE) report once again points to declining car ownership as have a number of Transport for London Reports in recent years.

2.6 We appreciate that Highways England is a road organisation but feel that insufficient attention is being given to alternatives like:

- rail - where there is little evidence of joined up thinking. In our attached comments on the *Midlands to Wales and Gloucestershire Route Strategy* we suggested consideration be given to transferring freight to the railway that runs parallel to the A49 for much of its length. As you're *The Road to Growth* makes clear there is a serious mismatch between the volumes of freight on road and rail and this is but one local example of how to redress the balance.
- the growth of the e-economy – where ideas and data will be the currency of the future impacting on the whole range of freight and passenger vehicle movements particularly in rural areas.
- Cycling – as the *Initial Report* indicates, investment can increase mobility, cut congestion, has individual and NHS health benefits and reduce pollution. The adoption of powered mobility scooters and electric cycles can increase access for more people and across more challenging routes. However suitable facilities may not be directly alongside the SRN because of pollution

and other dangers. Highways England should also recognise that prioritising investment in the places cyclists find most daunting – busy junctions etc. – while more expensive can increase usage more than miles of easily laid cycle paths that end where it gets dangerous.

Business and the Economy

3.1 We seriously doubt that any road in the southern Marches would produce the £3 return for every £1 invested as your *Initial Report* suggests. Tourism is an important part of Herefordshire's economy and all economic assessments of new road schemes should take full account of the potential costs to heritage and outdoor recreation/visitor economy as well as of business.

3.2 As your strategic economic growth plan *The Road to Growth* makes clear 'the SRN's primary role is to enable long-term, strategic journeys across the country'. Not many of these journeys pass through, originate or end in Herefordshire. Local safety, capacity or journey time priorities, where they exist, are just that – local issues - and should be seen as relatively low priorities in relation to the national, international and strategic issues such as new technology to be addressed by Highways England. Your proposed future studies however do appear to focus on such 'mega' transportation issues (*Initial Report* 5.3.11) and we cannot see that any part of the SRN in Herefordshire reaches anywhere near the scale and complexity of these.

3.3 Locally we do not want to see what would be a massive investment in increased road capacity at great financial and environmental cost and with limited economic benefit. Accordingly we have studied *The Road to Growth* in some detail.

- i. Figure 2 shows how few enterprises there are per hectare in Herefordshire – in the lowest two categories of the five mapped – so the opportunities for road based synergies between businesses are sparse.
- ii. Equally the population density mapped as Figure 3 shows Herefordshire – with the exception of Hereford City – as being in the lowest possible category at less than 5 per hectare. Quite simply there is neither a sizeable market nor a workforce locally. Successful SRN dependent businesses should be located near one or both of these or close to an international gateway. Road building in Herefordshire will simply induce travel as materials are imported, products are exported and employees have to travel distance to, and from work.
- iii. Figure 4 maps the forecast percentage employment growth for 2015-2031 in SRN dependent businesses across England. All of Herefordshire is in the range 0%-3%, the lowest category. Basically Herefordshire's key economic sectors are not SRN dependent.
- iv. Figure 5 maps traffic flows across the SRN. Those on the A49 corridor are in the lowest category at >20,000 vehicles per day. This is an argument for keeping the existing road in a good condition, not for making major physical improvements.
- v. The *Initial Report* (pages 52 onward) on future network demand shows, the increase in traffic levels is expected to be concentrated in hotspots across the whole SRN corresponding to areas of high population and economic activity and along the key routes which connect them. Herefordshire does not fit any of these categories.
- vi. Linked to this according to your *Interim Report's* core growth scenario – and agreeing with you that any forecast is subject to a high degree of uncertainty – the increases in daytime vehicles per day from 2015-2041 mapped along the A49 will be in the lowest category (<5000 vpd.) nationally. This is nowhere near a compelling case for a new road
- vii. The accompanying graph (pp 53 in the *Initial Report*) forecasts that the average speed in the West Midlands as a whole will only decline from 58mph to 54mph. This is not surprising given the significant overall increase in traffic forecast in an area that has some of the busiest roads outside London. However; Herefordshire has amongst the lowest traffic flows on the SRN in the West Midlands or indeed nationally and we would be surprised if this regional forecast applied even to that extent locally.

- viii. Figure 6 in *The Road to Growth* maps the total annual delay hours (April 2014 – March 2015) across the SRN. This shows a variable picture along the A49 with most of Herefordshire experiencing <100,000 hours per annum (hpa) i.e. in one of three lowest categories. Only around Hereford City does the annual total rise above this level and this is significantly below both the 200,000–500,000hpa and the 500,000+hpa categories experienced elsewhere on long stretches and at real hot spots on the SRN.
- ix. Put another way the map on page 53 of the *Initial Report* does show the forecast increase in daytime delays by 2041 exceeding 100 hours lost per day (the highest category) particularly around Hereford but this is one of a number of similarly rated locations along the A49 and the majority of the route in the lowest two categories of increase. This indicates to us that
 - a. road-building will simply move any delays experienced along to the next location
 - b. that other options to roadbuilding that smooth traffic flows might be more useful particularly when issues caused by slow moving – essentially agricultural traffic will – remain and
 - c. if the forecast delays do actually occur they are not high in real, especially national terms, and actually inconvenience relatively few people. The issue of real or perceived congestion should be kept in perspective locally which the RIS2 technical report does appear to us to begin to do although we doubt that many people will read this far.

3.4 We further note that according to Department for Transport data for 2016 published in December 2017 Herefordshire drivers are actually delayed less than most of the rest of England.

3.5 We conclude from all this that the business and economic case for major road investment in the Herefordshire countryside is very weak, that there are many higher national priorities and stretches of new road will simply not provide what is needed. Increasing road capacity in Herefordshire should be the last resort, bigger in this most rural of counties is certainly not better.

3.6 Herefordshire is not a major manufacturing area and efforts to attract such businesses to the Enterprise Zone have failed so far. Nor will Herefordshire ever be a sensible location for major distribution depots or logistics operations. We therefore welcome the long term view proposed in *Connecting the Country* that the A49 is most likely to remain an all-purpose trunk road (APTR) over the next 30+ years i.e. whose prime purpose is to deal with local and sub-regional traffic providing connectivity to more remote areas. We trust that this will remain the long term planning assumption. As we said in our comments on the *Midlands to Wales and Gloucestershire Route Strategy* ‘it is barely credible to even consider that the A49 through one of England’s most rural and scenic counties could ever become a serious alternative north-south corridor to the route via M50, M5 and M6 motorways’. If there are serious issues between the Midlands, Wales and Gloucestershire worthy of a national programme of works we would support the upgrading of these to Smart motorways at a suitably prioritised time and certainly before their current capacity is fully exhausted rather than extensive road building in Herefordshire.

3.7 Furthermore we do not see that the track record of delivery in RIS1 and the sizeable carry over of schemes into RIS2 provides huge confidence that Highways England can deliver further new schemes quickly, with adequate local involvement. By the time any such proposals can even be discussed openly, the transportation world may have changed fundamentally as your nine future challenges tend to indicate.

Customers

4.1 As the *Initial Report* says ‘Our roads connect workers to work, people to places, towns to regions and families together’ but they also divide and separate communities while damaging the

countryside. While the demand for connectivity is one of the nine future challenges identified in *Connecting the Country* for many rural communities the SRN separates, dislocates and cuts off people, families and services. Supporting the quality of life for people and communities across the country should not omit the often small rural communities along or close to your roads. Your *Health and Safety 5 Year Plan* identifies communities living near or who are affected by the SRN as being impacted and at risk – not least from vehicle air and noise pollution – and we look forward to there being more actions in future plans to engage local people in addressing these issues.

4.2 Making ‘roads work for everyone, not just those driving on them’ is one of your seven challenges and we do not believe that the current process helps at all. In fact we believe that the definition of customers/stakeholders adopted is insufficiently inclusive and shows a clear bias towards road users as page 24 of the *Initial Report* might indicate. In our view this significantly disenfranchises people who live close to strategic roads especially those who may not use the roads often or for long distances. The Transport Focus attention on road user priorities is wrong and we shall be taking this up with them direct. We will be suggesting that their current approach is partial. In particular their nine road-user priorities seem to us to potentially transfer benefits away from local communities while increasing their dis-benefits. We will always argue that future investment decisions should be informed by listening to customers and stakeholders as well as considering their priorities but that these do centrally include local communities and their representatives and that planning for the long term will be significantly improved if this is done.

4.3 If one of your ambitions is to be trusted by your customers then you must accept that these include local residents in rural communities and deal with them in an even handed way along with other vested interests amongst the business and transport world whilst accepting that they are likely to be volunteers who are likely to be disadvantaged technically, financially and organisationally. The comments in ‘*Connecting the Country – planning for the long term*’ about the inadequacy of consultation periods given the volume of paperwork are especially relevant to community engagement. They also apply to this RIS2 consultation in equal measure particularly as the timescale included the Christmas and New Year holidays and your online questionnaire is too simplistic and does not ask the correct questions.

4.4 We agree that focussing on customer needs means all those who use or are affected by the SRN and that this includes motorists, pedestrians, cyclists, horse riders, neighbouring communities, businesses and the various stakeholder groups that represent them – which includes town and parish councils. However this needs to be demonstrated much more consistently and continuously in the run up to RIS2 and further beyond if your *Customer Strategy* is to be credible. The *Initial Report* repeatedly mentions Local Enterprise Partnerships, The Freight Transport Association, emerging Sub National Transport Bodies and occasionally organised environmental groups such as the Campaign for Better Transport but there is relatively little coverage of more accountable bodies like local town or parish councils or of interest groups such as CPRE Herefordshire.

A safe, serviceable and free flowing network

5.1 We agree with the 2017 national CPRE report “*The impact of Road Projects in England*” that the longer-term safety impacts of road schemes need to be investigated further particularly in places like Hereford which you describe as a safety and congestion hotspot. In this connection we wonder if there are any results yet of the impact of your three pinch-point improvement schemes within Hereford city particularly on safety at the Asda/Belmont junction.

5.2 As our Section 3.3 shows, using your own data Hereford ranks low in absolute and relative terms for traffic volumes, safety issues and delays/congestion. We contend that your *5 year Health and Safety Plan* aim of a zero harm network is aspirational and impossible to achieve while humankind is involved. In our 2017 comments (attached) we also questioned the attribution of road safety issues in Hereford to the mix of local and long distance traffic in the city. We feel very strongly that a sense

of proportion and perspective is required when assessing the size of the investment to be made and when balancing investment priorities. While every effort should be made to reduce accidents in the county we do not believe that the local safety record on its own is a sufficient justification for major road building.

5.3 Your *Initial Report* indicates a preference for providing better roads over building new ones (5.3.7). In the attached 2017 comments on the *Midlands to Wales and Gloucestershire Route Strategy* we suggested a whole range of relatively minor works in and around Hereford city. These improvements should be made before there is any consideration of new road building. Rather than new construction we also supported improvements to the currently limited traffic incident management capability along the A49. We note that the Traffic Officer Service (TOS) is not currently available on the majority of APTR's including the A49 but our view remains that this is a worthwhile investment especially as it is primarily driver behaviour not engineering weaknesses that cause problems on the route. You state that you will be discussing the extension of the TOS along the busiest routes with the Government. If the A49 is not amongst these busiest routes then we question why major works might ever be considered along it? In our view the TOS is important in providing more reliable journeys along the A49 corridor through Herefordshire coupled with adequate, well placed signage for diversionary routes which may well be outside the county given its rural nature.

5.4 Just as we believe that aiming for a zero-harm network is unachievable while human kind and machinery are involved we also question Highways England taking total responsibility for reliable journey times. Surely there is a responsibility upon all motorists to plan ahead and the logistics industry has complicated software to assist this task?

Final points

6.1 We are surprised that the maps in Section 4.4.2 of the *Interim Report* and other places appear to have gained the A465 Abergavenny Road which was not included in the local route strategy for the A49. This appears in the Major Roads Network consultation which is also running currently. Is this a cartographical error or is it the intention to add it to the SRN?

6.2 In our 2017 comments on the *Midlands to Wales and Gloucestershire Route Strategy* we detailed a number of apparently poor planning decisions made by Herefordshire Council with the potential to adversely affect the resilience of the strategic road network locally. We would support a more robust and consistent approach by Highways England to economic development including opposition to proposals that clearly damage the SRN and suggest that this is applied from now onwards.

6.3 It is unclear to us if the proposed western bypass for Hereford proposed by Herefordshire Council is to be part of the SRN (under one of your dedicated funds) or the National Road Network (NRN) so we will leave detailed comments on this for the current NRN consultation.

Yours sincerely,

Dr Anthony Geeson
Vice Chair CPRE Herefordshire