

Jesse Norman Esq MP
Minister of State for the Department of Transport
Great Minster House
33 Horseferry Road
Westminster
London
SW1P 4DR

15th May 2019

Dear Mr Norman,

RE: Draft Road Investment Strategy 2 – Government Objectives – October 2018

In February last year Herefordshire CPRE took part in the RIS2 consultation– Shaping the Future of England’s Strategic Roads - and sent eight pages of comments to Highways England. We have now considered the detail of your Department’s response to Highways England, published last October.

We are disappointed that so little notice has been taken of our very real concerns about the direction being proposed by Highways England. We are even more concerned now that this direction appears to have substantial Department for Transport support. RIS2 was an opportunity for the road building process to change direction for the better which is now being squandered

In particular we conclude that

There remains too much emphasis on users

The definition of users is too restricted and the emphasis upon users is too great. Transport Focus’s brief should be broadened. There remains a substantial bias towards vehicle users and thus there is a partial approach to future priorities. In our view emphasising road user priorities potentially transfers benefits away from local communities while increasing their dis-benefits. Local communities / residents also use roads but unlike cyclists, pedestrians and equestrians are not mentioned explicitly. However residents bear the costs of the Strategic Road Network 24/7 unlike those who pass along it.

Local communities are still being excluded

The proposals for RIS2 largely ignore the needs or aspirations of the local people most directly affected by the presence of the SRN because it is convenient to do so. Much emphasis is placed upon listening to customers and stakeholders but local communities and their town & parish councils are not even mentioned in your *Objectives for RIS2*. They must be given a central role in this process. Decision making is too dominated by other sectoral, un-elected groups such as the sub national transport bodies including Midlands Connect. They are non-statutory and have no formal powers. We believe that planning for the long term will be significantly improved by a more inclusive process. Your desire to ‘*Work in partnership*’ so that decisions are ‘*respectful of places*’ simply will not happen if the partnership is so deeply flawed and does not adequately reflect the places concerned.

In their *Initial Report* Highways England stated that ‘building a pipeline of schemes must involve local communities’. Their involvement is insufficient at present. The active engagement of communities in these localities is vital before any list of proposals is produced and published. Highways England was also concerned to ‘avoid the dangers of premature announcements before the right information is available’. However the ‘right information’ is quite simple; nothing more than an announcement that there is an issue with the current SRN. This can then be explored with the communities most directly concerned and options arrived at collaboratively which may, or may not include road works.

Potential RIS2 schemes should not be a state secret

There is a real and pressing need for DfT and Highways England to improve the way people and communities affected by RIS2 are informed. The fact that your *Investment Plan* does not include a list

of capital projects is quite simply appalling. Highways England has already told us that there are 55 schemes being considered for the RIS2. They are promoting 95% themselves and the remaining 2 or 3 are being promoted by local highways authorities. Where are these schemes? Do the local communities, both potential supporters and objectors, know?

Siding with Highways England you justify this secrecy with a need for *'further tests into the deliverability and value for money of front running schemes before making decisions'*. This supports our viewpoint. Road schemes should not emerge from behind closed doors having developed by vested interests to the exclusion of local communities and their representatives. Thus claims that the DfT's *long term vision and objectives* address the 'needs of road users and those affected by the road network' are simply not true. The latter continue to be excluded from the decision making process until it is too late when preferred solutions have already been developed and maybe even routes chosen. At this point they are disadvantaged technically, financially and organisationally and the process can become unnecessarily confrontational. No one likes being presented with what appears to be a done deal. Our concern is heightened by the *five themes* by which you will consider the merits of individual schemes. Not only do these omit the views of local people but run the risk of measuring the same thing twice e.g. by including stakeholder support as well as the benefits for users.

Insufficient weight is still being given to the environment

Retrospectively making changes to existing roads through the environment designated fund in RIS1 was an admission that the (often predicted) environmental damage caused by the SRN has occurred and that current standards are, thankfully, higher. Although such retro-fitting is planned to continue in RIS2; we are concerned that the lessons of past decades have not really been learnt and that RIS2 will repeat them. The casual acceptance that net gain is always a good thing hides the potential for very real losses. It is a concept driven by accounting neatness and not a real understanding of environmental improvement. In our view your intention that Highways England should demonstrate that *'environmental considerations will be mainstreamed across its everyday business'* will not be met by the *six outcome* areas proposed for their revised performance specification.

Finally

We now argue that the SRN should include a fifth road category, Rural Trunk Roads. These are where there are very few alternative high capacity roads to provide network resilience and where major engineering works are neither environmentally possible nor economically justified. Here priority should be given to better connected, technologically advanced roads with users benefitting from reliable data flows and information. Rural communities and enterprises could 'piggy back' on such SRN investment and flourish. In Herefordshire there are many Wi-Fi 'not spots' surprisingly close to major roads. Safety measures, improved maintenance and surfaces and a consistent traffic officer service should also be prioritised. You may wish to bear this in mind as you review the geographical extent of the SRN and prior to confirming Highways England's four proposed road standards.

We urge you not to lose sight of our concerns and to consider amending the Governments objectives for RIS2 even at this late stage and reflect them in your final documents to be published later in 2019.

Yours sincerely,

Dr Anthony Geeson
Vice Chair CPRE Herefordshire

Cc Bill Wiggin MP, Office of Rail and Road, Leader of Herefordshire Council