

## RAC Foundation's Response to the DfT's consultation:

### Shaping the Future of England's Strategic Roads, February 2018

#### Introduction

1. The RAC Foundation is an independent transport policy and research organisation which explores the economic, mobility, safety and environmental issues relating to motoring and road use. We are happy for our response to be published in full.

2. The Foundation is supportive of the direction of travel that Highways England is taking. It bears remembering that Highways England has only existed as a government-owned company in its current form for less than three years. It is still early days. Nevertheless, there is plenty of evidence for thinking that the architects of the new arrangements – in particular, first chair of the Highways Agency Alan Cook – got it right in advocating the arms' length model.

3. It has been particularly welcome that despite the political and economic trials and tribulations of the last two years, the new Government, and Chancellor Philip Hammond within it, have stuck with George Osborne's financial commitment to a five-year funding envelope for Highways England, and are still holding to the intent of creating a Roads Fund from Vehicle Excise Duty (VED) income. We do, though, have three concerns:

- the Roads Fund exists as a political promise, not a statutory scheme – it would be far preferable, and far more reassuring for the highways supply chain, for the existence of the Roads Fund and the pass through of VED income to be written into law;
- Ministers are clearly minded to share the Roads Fund between Highways England and the local highway authorities who steward the Major Road Network (MRN), which Government is in the process of defining through a consultation exercise still live at the time of writing. We support the MRN concept, but would not wish to see the solution to Highways England's financial position undone to solve a different, though still pressing, problem;
- Highways England would clearly prefer similar financial freedoms as would exist in a wholly private company, removing the tight controls that apply to the separate management of capital and resource spending and to the limits on end-year flexibility. We agree that more freedom to operate within a more all-encompassing five-year financial envelope should enable Highways England to focus more on the efficiency of spend and less on annularity or the 'colour' of money.

4. As with other DfT consultations in our response we are only concentrating on questions where we have something in particular to say.

**Question 1** - *Do you think Highways England's proposals will deliver what users of the SRN want? If not, what could be done differently?*

**Question 2** - *Do you think Highways England's proposals will deliver what businesses want? If not, what could be done differently?*

5. We have no problem with the articulation of user requirements as expressed in the Highways England Initial Report, and welcome the extent to which Highways England is striving to gain a better understanding of its customers' needs and opinions in general and in specific locations. The availability and reliability of the network are mission critical for all users, business or otherwise. Well-targeted enhancements, well-managed maintenance and better communications taking advantage of emerging technology will all help, but create challenges of their own in the interim, as the work is done.

6. Our concern is with the interaction between schemes:

- on the strategic road network,
- with schemes on other roads, and
- other major construction works (such as HS2).

Whilst we can see this challenge recognised in the development of the Route Strategies, we think it would be fair to say that the jury is still out on whether the planning and co-ordination of works, traffic management and interaction with site traffic is all going to come together in a way that will allow road users to understand the implications and take informed decisions *in good time*. We need the effective co-ordination and we need it to be effectively and widely communicated. This is particularly important for the freight sector.

7. On business users and on the freight sector, in particular, there is an issue about the availability of lorry parking on and near the SRN which is at its most acute in Kent, but is a national concern for the FTA and RHA. We would support the existence of a designated fund for roadside facilities in general, and would like to see a clearer plan for providing adequate roadside facilities specifically for short and long-stop truck parking.

8. We welcome the fact that the Initial Report talks about 'seamless journeys', of which travel on the SRN is only a part. It is very important that all Highways England staff see themselves as providing a critical part of a joined-up national system, not as the stewards of a discrete network. We note the reference to the 2010 pilot project on traffic management with Surrey County Council and would welcome evidence of more being done to improve the integration of the SRN with other roads.

**Question 3** - *Do you think Highways England's proposals meet the needs of people affected by the presence of the SRN? If not, what could be done differently?*

9. We were pleased to see the publication of Highways England's new design principles and look forward to their incorporation into the refreshed Design Manual for Roads and Bridges. Clearly much can be done to deliver sympathetic design and environmental

mitigation in new schemes. We support the retention of a designated environmental fund for 'green retrofit' and noise abatement schemes. We also welcome Highways England's commitment to work with the Department for Transport, Defra and local authorities in the context of the Litter Strategy for England to tackle the problem of litter which is a particular eyesore in certain places.

10. We suspect more could be done to design effective, less visually intrusive, noise screening barriers. We note the success of the experimental colour treatment of gantry structures from grey to brown, and would observe that rather than engaging in the expense of coating gantries and other structures it would be far preferable to order the metalwork pre-treated, which should involve no additional cost at all.

**Question 4 - Do you agree with Highways England's proposals for:**

- *Four categories of road and the development of Expressways (Initial Report sections 4.4.3 and 5.3.6)*
- *Operational priorities (Initial Report section 5.1)*
- *Infrastructure priorities (Initial Report section 5.2)*
- *Enhancement priorities (Initial Report section 5.3)*
- *A local priorities fund (Initial Report section 5.3.8)*
- *Future studies (Initial Report section 5.3.11)*
- *Designated funds (Initial Report section 5.4)*
- *Performance measures and targets (Initial Report section 6.3)*

*If you disagree with any of these, what could be done differently?*

11. We support the concept of road categories as set out in the Initial Report, and particularly commend Highways England for the very clear and helpful graphics. The development of the 'smart' concept, in particular the opening of the hard shoulder as a temporary or permanent running lane, is changing motorists' sense of what a motorway is. Too many drivers are using lane 2 or lane 3 of an all-lane running stretch of motorway because they don't recognise the conversion of the hard shoulder to become lane 1. There are ongoing concerns about the spacing and signing of refuges, and the meaning of the red X and other warnings carried on variable message signs (VMS). So, the more the nature of the road can be standardised into a limited number of familiar and readily comprehensible categories, the better.

12. We would, though, argue that the success of these new models will depend not just on the design and technology being put in, but also:

- on the removal and/or replacement of the technology that has long-since had its day. The presence of early generation warning signs in the central reservation and early model variable message signs with limited display capacity are, at best, a distraction; and
- on the capability of the overall system architecture to generate, update and remove accurate, timely messages. At present alternating variable message signs can carry inconsistent messages (set through different systems). And whilst we strongly

support the decision to drop the road safety messages – VMSs should carry only information that is relevant to the traffic in their location - it is impossible to tell whether a VMS is blank because it isn't working, or because it has nothing to convey (overseas, VMSs post the time and the temperature when not conveying a traffic warning or information message).

13. Ultimately the identification and prioritisation of enhancements should be driven by Highways England's need to achieve the performance specification set by its government shareholder/funder. It is too early to say whether this is yet feeding through.

14. As mentioned elsewhere, we are supportive of the continued provision of targeted, designated funds, and consider the spread of funds appropriate in the light of the Government's aims.

15. On performance measures, we strongly agree that there is a distinction to be drawn between the generality of data that Highways England collects and holds, all of which should be made available as 'open data' for others to analyse and interpret, the specific metrics which, over time as trends become apparent, tell us how the network is performing, and the specific performance targets on which the success of Highways England's management is judged.

16. Practically every business that seeks to incentivise its managers and staff struggles with the challenge of setting targets that are within the operational 'gift' of those tasked with achieving them. Every system is prone to windfalls (unexpected celebrity endorsement of a product) and shortfalls (ask any dealership with a high stock of 2017-model diesel-engine cars).

17. The most important point, for us, is whether the metrics identified as key performance indicators are both reflective of customers' needs and create the right focus for managers' attention. To that end we would argue for retention of a road safety KSI measure. But on network performance we would like to see development of a three-part measure of 'delay' distinguishing between planned works (enhancement and maintenance), excess traffic demand over design capacity, and delay resulting from incidents (crashes etc) above a threshold. We think this goes to the heart of network reliability better than the current lane-mile availability measure.

**Question 5** - *Are there any other proposals in the Initial Report that you do not agree with? If so, which ones and what could be done differently?*

**Question 6** - *Do you agree with Highways England's assessment of the future needs of the SRN (Initial Report section 4.4)? If not, how would you change the assessment?*

18. "The future is inherently uncertain" says the Initial Report. We could not agree more. The only thing we can say with absolute confidence about the future is that it hasn't happened yet.

19. We think Highways England has identified the right trends to track and model in thinking about the challenges and opportunities the future might bring. The key point we

would make is that when we are contemplating congestion resulting from traffic growth we are only considering how much *worse* things might get: many parts of the network are already running well-beyond design capacity. It might be an interesting exercise to back-cast how far traffic levels would have to shrink before we could be confident of a smooth reliable journey without adding additional capacity and management measures. Meantime we would urge Highways England, and Ministers, to focus at least as much on the stewardship of the existing network as on headline-catching capacity enhancement schemes: maintenance really matters!

**Question 7** - *How far does the Initial Report meet the Government's aims for RIS2 (economy, network capability, safety, integration and environment – described in paragraph 2.3)? Which aims could Highways England do more to meet and how?*

20. Given the breadth and scale of the Government's aims we think the Initial Report reflects a good attempt to cover all the bases within the available funding, recognising also the capacity of the supply chain and the need for Highways England to have taken steps, still in train, to develop its own capability as an intelligent customer.

**Question 8** - *Do you think there should be any change in the roads included in the SRN (described in paragraph 1.3)? If so, which roads would you propose are added to or removed from the SRN, and why?*

21. We see no pressing case for a fundamental review of the extent of the SRN. Highways England has enough of a challenge on its hands without taking on significantly more route miles. It is possible that there are 'tail ends' of routes that might be better managed as part of the SRN, but this requires a degree of local knowledge that we do not have, and, ultimately, depends on the effectiveness of the working arrangements between Highways England and neighbouring Highway Authorities. Given Highways England's ability to spend money 'off-network' to achieve a better traffic outcome it should be possible to achieve better outcomes without engaging in the time-consuming process of trunking/de-trunking.

**Question 9** - *Is there anything else we need to consider when making decisions about investment in the SRN? If so, what other factors do you want considered? Please provide links to any published information that you consider relevant.*

22. This appears to be the most appropriate place to argue for far better accident and incident investigation on the SRN. Our December 2017 report proposed, as an option, the establishment of some form of independent investigation unit. This is not just about safety but about the extreme traffic disruption that can ensue from even relatively minor incidents. We would be happy to discuss this further.

**Question 10** - *Does the analytical approach taken have the right balance between ambition, robustness, and proportionality? If not, what do you suggest we do differently?*

23. The analytical approach appears sensible, recognising that Highways England is, as yet, still in the process of getting a grip on its own, numerous and extensive, data sets. Alongside ambition, robustness and proportionality we might add 'uncertainty', on the

grounds that all modelling should be couched in terms of ranges, not point projections, and the ranges should not be narrowed too early in the analytical process. It will also be important for Highways England's analytical approach to stay in step with the main departmental process – it might highlight the need for changes across the piece, but it would be difficult if the approaches generated inconsistent pictures.

**RAC Foundation**

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