

Shaping the future of England's strategic roads
Response (July 2023) on behalf of the Stonehenge Alliance
to the set of proposals made in National Highways' Initial Report

Foreword

The Stonehenge Alliance is supported by Ancient Sacred Landscape Network, CPRE, FoE, Rescue, the British Archaeological Trust, Transport Action Network and many individuals worldwide.

The Alliance has for many years campaigned for a solution to congestion on the A303 at Stonehenge that does not compromise protection of the World Heritage Site and its outstanding universal value. We have looked at all potential transport and other alternatives to the damaging road scheme currently under consideration. We are increasingly aware of the need for any solution, not only to protect the World Heritage Site, but also to fully address Government policy on decarbonisation and environmental protection.

This response to the public consultation on National Highways' strategic road network Initial Report has been prepared by our transport specialists and agreed by members of the Committee.

Introduction

The Stonehenge Alliance strongly objects to the RIS3 proposals and approach as set out in this consultation on National Highways' Initial Report.

We find it necessary to repeat here many of the points which we raised in the recent consultation on the draft National Policy Statement for National Networks because, perhaps unsurprisingly, we find the proposed strategic objectives for RIS3 are based on the same flawed premises.

To re-iterate: in the High Court judgment on the Stonehenge scheme the significant conclusion was that the promoters of the scheme should have considered alternatives. The response so far from National Highways has been to posit alternative road schemes and then dismiss them for various reasons. This seems entirely to miss the point, that transport problems require transport solutions. It is completely understandable that National Highways should take the point of view it does, because it is not a transport-oriented organisation. National Highways exists entirely to build and manage part of the road system. Its very existence and, consequently, all its careers, its defence mechanisms and its thinking, are dependent on the building of roads. It not only has no interest in other modes of transport, it has a self-interest in finding reasons to oppose them.

However, one might have hoped that the Department for Transport would take a broader view, being concerned with finding the best solutions to transport problems. Specifically one would expect that the Government's commitment to reach net zero emissions by 2050 might be a prime focus for the DfT, and that they would therefore be taking urgent steps to steer transport onto a more sustainable course which meets this goal.

The [Carbon Budget Delivery Plan](#) [March 2023] makes it clear that *"The government is committed to delivering its international commitments, including the 2030 Nationally Determined Contribution (NDC) under the Paris Agreement.... We have quantified emissions savings to deliver 88 Mt or 92% of the NDC. We are confident the delivery of emissions savings by unquantified policies detailed in this package will largely close this gap and the government will bring forward further measures to ensure that the UK will meet its international commitments if required."* [Paras 28,29]

However, as has been made clear from further information released to Dr Greg Marsden, after considerable delay, the Government's Transport Decarbonisation Strategy assumes traffic levels will be considerably lower than the National Road Traffic Projections used by the DfT to justify its road building. As Dr Marsden has stated in a Feb 2023 article [The route to Net Zero: DfT assumptions look well off course](#) [TransportExtra Magazine, 8 February 2023] *"... we are currently appraising our major infrastructure investments on the basis of a set of assumptions about future traffic levels and carbon emissions which are not even close to being net zero compliant."*

The assumptions being made by National Highways include projected traffic growth varying from 13% - 36% between 2015 and 2041 depending on the selected scenario (see Initial Report p.72). This is at variance with the recommendations of the Climate Change Committee whose informed work in this area has led them to summarise, in their [2022 report to Parliament](#) that *"...the Government has not yet set out a clear vision of the extent of traffic reduction that is desirable, nor a coherent set of policies to deliver this. Actions and funding need to be more joined-up across the country and between transportation modes, and key enablers such as spatial planning and transport appraisal methodologies must be better aligned to the objective of providing widely available, cost-competitive, sustainable alternatives to private car travel."* [CCC, Progress in reducing emissions, June 2022, p.130]

The Climate Change Committee's [2023 report to Parliament](#) reiterated the lack of progress in curbing transport emissions, stating that *"The Government has made no progress on our recommendations on clarifying the role for car demand reduction and ensuring that key enablers (road-building decisions and taxation) are aligned to delivering this."* [CCC, Progress in reducing emissions, June 2023, p.109]

Consultation Questionnaire

To answer some of the questions posed in the consultation document in the light of the overriding concerns expressed above:

5. What level of importance do you assign to the RIS3 strategic objectives?

As mentioned above, we consider ‘**improved environmental outcomes**’ to be very important. This must encompass the net zero target referred to above, in addition to other environmental goals, and requires a complete reset of the road strategy since the current plans disregard the induced demand which will result from extra road capacity and place an undue reliance on a switch to alternative fuels. The environmental costs associated with the manufacture and operation of vehicles of any type need to be taken into account, as does the ongoing particulate pollution associated with brake and tyre wear and the negative impacts of congestion on the economy and environment.

This also needs to encompass heritage assets and needs to give a greater focus to conserving and enhancing them, rather than trying to bulldoze through roads which are highly damaging. While schemes such as A303 Stonehenge, opposed by UNESCO, remain on the books there can be little faith that the system is being reformed and environmental protection prioritised.

Regarding the objective of ‘**Improving safety for all**’, this we would also consider to be very important. However, the focus should be on cheaper, small-scale or non-physical interventions, such as speed enforcement. Small changes can rapidly improve safety and perceptions of it. Safer and convenient facilities for active travel across the network are particularly lacking, and active travel can bring positive benefits to health and wellbeing, and to the local community and economy.

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

The trends for ‘*how much our customers will travel*’ is based on the updated forecasts from the DfT and disregards the recommendations from the Climate Change Committee regarding traffic reduction and targets set elsewhere for Active Travel. The Government itself has pledged that “*We will use our cars differently and less often*” (DfT, ‘[Decarbonising Transport](#)’, July 2021, p.36), and has committed that “*Cycling and walking will be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030*” (Government Policy Paper “[The second cycling and walking investment strategy \(CWIS2\)](#), updated March 2023).

The focus should not be based on the outdated ‘predict and provide’ methodology but on how National Highways can work with other transport providers to meet traffic reduction targets and encourage modal shift.

8. To what extent do you agree or disagree with National Highways’ approach to improving safety on its network?

9. Why do you disagree with the approach?

No-one can argue with the need to make roads as safe as possible, however there are inherent dangers in road travel which are likely to increase as National Highways pursues policies which increase road capacity and add more vehicles to the road network. The levels

of deaths and seriously injured on the nation's roads would be considered completely unacceptable in any other industry or occupation.

The assumption which National Highways makes, based on the Wehtag methodology, is that a high capacity modern road has a lower incident rate than any road it replaces. In fact it has never been demonstrated that the building of such roads improves the overall safety of the network. DfT has never researched the matter, so we just do not know whether there are effects (e.g. off-junction speed behaviour) that add risk to the surrounding network. There needs to be a major shift on policies which will enable all classes of vulnerable road users to feel safer when using, joining or crossing, the road network.

As the Rail Safety and Standards Board has pointed out, a train journey is over 20 times safer than travelling the same distance by car ([see RSSB website, July 2021 news article](#)). This suggests that there would be considerable safety benefits if the Department for Transport focused on policies to encourage modal shift rather than policies to increase road traffic.

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

14. What proposals do you disagree with and why?

The target of achieving 'net zero corporate emissions by 2030' ignores the far greater direct and indirect emissions which will result from the expansion of the road network in RIS2 & RIS3 schemes. 'Enabling' and 'encouraging' a transition to zero carbon motoring is not a strong commitment, and does not encompass the intention to reduce road traffic levels and user emissions. Increasing traffic will also likely encourage greater car ownership with the extra emissions and impact that this will have.

There is a mention of the aspiration to '*remode*' journeys, focusing on those '*under 5 miles and in areas of re-occurring congestion*', and there is also talk of a '*greater emphasis on purposefully supporting active travel*'. There is little further detail however about what is proposed in these areas.

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

16. Why do you disagree?

The '*targeted approach to enhancing our network*' includes delivering committed schemes from RIS1 and RIS2. Many of these do not fit the current proposal to develop schemes '*only when problems cannot be fixed by other approaches*' and '*progressing those schemes that have wide and varied support from stakeholders and users*'. For instance, in the case of the A303 Amesbury to Berwick Down scheme the five Planning Inspectors unanimously concluded that development consent should not be granted (report dated 2 Jan 2020); however, this was over-ruled by the Secretary of State in Nov 2020. When challenged via a crowd funded judicial review, the High Court quashed the Development Consent Order in July 2021, and two

years later the scheme remains in limbo awaiting ‘redetermination’. Non-road building alternatives have not been considered, and in the face of opposition from many parties – including UNESCO, as well as nearly quarter of a million people who have signed online petitions – it is hard to see how this can be claimed to have the ‘wide and varied support’ which is now a stated requirement.

We strongly concur with the recommendations from the Climate Change Committee’s [2023 report to Parliament](#) that the DfT needs to “Conduct a systematic review of current and future road-building projects to assess their consistency with the Government’s environmental goals. This should ensure that decisions do not lock in unsustainable levels of traffic growth and develop conditions (which can be included in the Roads Investment Strategy 3 process and beyond) that permit schemes to be taken forward only if they meaningfully support cost-effective delivery of Net Zero and climate adaptation.” [CCC, Progress in reducing emissions, June 2023, Recommendation R2023-148, p.420].

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

18. Why do you disagree?

The carbon metric ‘to reflect our ambition to enable and embed low-carbon approaches’ does not sound as if is going to be a genuine attempt to measure the total carbon generated by the Strategic Road Network.

Achieving ‘10% biodiversity net gain from nationally-significant infrastructure projects’ is a laudable aim. However, it would be better to avoid harm in the first place and then minimise any harm that might arise. Just focussing on biodiversity net gain is unhelpful and can cause wider issues if particular species are negatively impacted and replacement habitat is of lower quality than what is being lost.

‘Exploring a performance indicator that supports active travel by understanding the views of our cyclists and walkers’: it is unclear what this means or what it would be used to determine.

A couple of metrics which might usefully be added are traffic volumes (which need to be on a falling trajectory) and air quality (which needs to show improvements, especially for particulates).

19. What, in your view, could be done differently to meet the needs of people affected by the presence or operation of the SRN?

There needs to be a recognition that catering for increased traffic on the SRN will inevitably result in additional traffic across the whole road network, since journeys will typically start and end on local roads. So measures to encourage a shift to public transport and to active travel would improve the quality of life of users living on and using the entire road network.

Steps need to be taken to reduce speeds and enforce speed restrictions particularly where the SRN passes through communities. The SRN can be a major barrier where it does intersect communities and consideration needs to be given to safe and convenient crossings.

The initial report refers to the aspiration to improve air quality across the network. There is increasing concern about the harm that fine particulate matter causes to human health. In view of these health concerns the Royal College of Physicians has written to urge the Government to “bring forward an ambitious suite of targets, including to reduce levels of PM2.5 pollution to 10µg m⁻³ by 2030, without delay.” ([Royal College of Physicians, Press Release, 4/11/2022](#)). Even this target is less ambitious than the [current World Health Organisation guidelines](#), which specify an annual average concentration of 5µg m⁻³. Given that EVs still cause particulate pollution from their brakes and tyres, National Highways need to supply more specific details about what they are doing to monitor and reduce levels of air pollutants along their network. The WHO recommendations include prioritising rapid urban transport, walking and cycling networks in cities and rail interurban freight and passenger travel.

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

The Climate Change Committee is an independent statutory body established under the Climate Change Act 2008. The Government should consider following the advice they are being given by this body. [The 2022 Progress report](#) made 37 recommendations which relate to Surface Transport, three of them urgent – how many of these are being actively addressed?

As an example, one recommendation from the Climate Change Committee was that HM Treasury should “*Scope and develop options for future fiscal policy to replace fuel duty, e.g. road pricing*”, with a suggested timing of Q1 2023. ([Progress in reducing emissions: 2022 Report to Parliament](#), p.534) and is now listed as overdue in the 2023 Report to Parliament. The Government’s response to this suggestion refers only to the use of vehicle excise duty (VED) to encourage the uptake of EVs. This will do nothing to encourage modal shift and has none of the potential which road pricing has, for example to incentivise the use of the road network at off-peak hours to encourage a more even flow of traffic. ([Responding to the Climate Change Committee’s \(CCC\) Annual Progress Report 2022 Recommendations](#), March 2023, Recommendation #287, p.159)

This same policy recommendation was made in the Transport Committee’s report on Road Pricing (published on 4th Feb 2022): “*The Treasury is responsible for taxation policy, including motoring taxation; the Department for Transport is responsible for road connectivity. The Government must work on a cross-departmental basis to join up policy on maintaining tax revenues, facilitating road connectivity and supporting the shift to zero emission vehicles. To that end, the Department for Transport and the Treasury must work together to (a) set out their preferred options for replacing fuel duty and vehicle excise duty and (b) establish an*

arm's-length body with an appointed individual to evaluate the potential merits of those options. The situation is urgent.” (see Transport Committee’s [Report summary](#)).

It is very disappointing that National Highways has ignored the views of the Climate Change Committee and the House of Commons Transport Committee in respect of an important topic like road pricing, which both bodies have recommended. One might hope that a section such as “Driving decarbonisation and environmental sustainability” would allow National Highways to focus on the possible options; however, it seems more intent on pursuing a ‘business as usual’ scenario.

25. Any other comments?

National Highways, and the Department for Transport, have failed to recognise that the imperatives of net zero, including the 2030 Nationally Determined Contribution (NDC) under the Paris Agreement, call for a radical change of direction. This is particularly the case since, as the [Carbon Budget Delivery Plan](#) [March 2023] reminded us *“In 2020 transport remained the biggest emitting sector of the UK economy, responsible for 24% of UK greenhouse gas emissions. Reducing transport emissions is therefore a clear priority to successfully enable carbon budgets to be met.”*

We do not need another document telling us how National Highways will be carrying on with as few changes to its ‘predict and provide’ methodology as it can get away with. Instead the DfT should focus on working collaboratively across different transport modes: there needs to be an acceleration of the delivery of the 78 commitments made in the [Transport Decarbonisation Plan \[July 2021\]](#) and advice from the Climate Change Committee and the National Audit Office must be followed. There is an urgent need to move ahead on multiple fronts to deliver modal shift, including a significant switch to active travel, as well as encouraging higher car occupancy and a faster move to electric vehicles.