

**Transport Focus response to the Department for Transport's consultation:
Shaping the future of England's strategic roads - consultation on Highways
England's Initial Report
January 2018**

Transport Focus is the independent, consumer watchdog representing the interests of all users of England's motorways and major 'A' roads, the Strategic Road Network (SRN). We welcome the Department for Transport's (DfT) consultation on Highways England's Initial Report, a key milestone in development of the second Road Investment Strategy (RIS) which will cover 2020-2025. We are pleased to have worked with DfT, Highways England and the Office of Rail and Road (ORR) to ensure that there is a clear understanding of what road users want. We welcome the fact DfT and Highways England have drawn on Transport Focus's June 2017 report "*Road users' priorities for the Road Investment Strategy 2020-25*"¹ (referred to below as '*RIS2 Priorities*') in preparing their documents: all nine of the areas we highlighted as priorities are discussed. We encourage DfT to continue to refer to that document as a 'sense check' of road users' views as the RIS is finalised. Transport Focus's response to the questions raised in DfT's consultation are set out below.

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

Overall, we think Highways England's proposals will start to deliver the outcomes SRN users tell us they want, although that is in the context of expected increasing demand and the resulting impact on journey times and their reliability. Of course the devil is in the detail of what, and how much, DfT finally purchases through the RIS.

Transport Focus welcomes the strong focus in the Initial Report on delivering the basics in respect of the existing SRN, alongside enhancing capacity where needed. Facilitating comfortable, reliable journeys on the existing network is vital. We strongly encourage DfT to ensure there is sufficient capital for Highways England to renew assets, particularly road surfaces and signage, to meet road users' expectations. And also that there is sufficient funding for day-to-day maintenance, for example of white lines, 'cats eyes', signage and lighting.

Areas where the Initial Report is less strong include specific proposals regarding safety, including how Highways England can work with others to encourage 'better behaved drivers' (see also our response to Q7); how the company will seek to understand and embrace the needs of its customers in the freight logistics and coach/bus industries; and how the company will relentlessly seek to drive down the causes of delay, whether within its direct control or not and whether preventative or clearing up quickly when things go wrong. Also, there is surprisingly little substance to the section on customer service ambition (Page 65); and it remains unclear what Highways England's vision is for the SRN in respect of cyclists, pedestrians and equestrians. For instance there is no response to Transport Focus's question about whether it would be in the interests of all SRN users for alternative provision to be sufficiently good that this set of users no longer need to share the carriageway with cars and lorries.

¹ <https://www.transportfocus.org.uk/research-publications/publications/road-users-priorities-for-the-road-investment-strategy-2020-25/>

Question 2: Do you think Highways England's proposals will deliver what businesses want? If you answered no, what could be done differently?

While proposals in the Initial Report will clearly help, we think they should have gone further in relation to those businesses which rely on the SRN to operate – as mentioned above, particularly in the freight logistics and coach/bus sectors. Supporting the economy, through the efficient transport of goods and a reliable service for businesses generally, is a key part of the rationale for the SRN, and so business users' needs should explicitly underpin much of how the network is to be developed. The Initial Report could have said more about how Highways England proposes to improve journeys to/from international ports and airports. Our *RIS2 Priorities* report identified three specific requirements for business users of the SRN:

- accurate information on scheduled roadworks 14 days in advance - particularly important to freight operators, given the concentration of planned closures overnight when they account for a much greater share of traffic. Highways England make (on Page 66 of the Initial Report) only a general commitment to Better Information for users, which is not followed through in the next section on Better Roadworks.
- a strategy to ensure sufficient capacity for lorries to park in the right places and with facilities to meet drivers' needs. We welcome the proposal for a Designated Fund for roadside facilities (see below), but are concerned there is no reference at this point to the needs of the freight sector.
- more effective engagement by Highways England, through a dedicated business unit within the company. Road hauliers are recognised as the third of its four key customer groups, but there is no proposal to develop a more effective customer-supplier relationship with businesses in this sector.

Question 4: Do you agree with Highways England's proposals for If you said no to any, what could be done differently (referencing the topic)?

(a) the four categories of road and the development of Expressways (initial report sections 4.4.3 and 5.3.6)

We welcome the approach to implementing expressways and, as a response to the questions we posed in our *RIS2 Priorities*, the decision that completed expressways should be designated as motorways. This is far preferable to branding them 'expressway' with the need to explain how that differs from a motorway or an ordinary 'A' road. In short, the four categories of road are fine, but road users should not need to be conscious of more than three. We note that the explanation of expressways as an end in themselves on Page 54 appears to contradict other parts of the Initial Report.

(b) the operational priorities (initial report section 5.1)

We are pleased to see the primacy given to operations, maintenance and renewals in Highways England's aspirations for Road Period 2, and note the extensive package of measures to this end proposed in the Initial Report. Certain elements however would benefit from greater determination than is evident from the tentative approach proposed. For example, completing roadworks in shorter sections (Page 67); seeking greater freedom of action on what Variable Message Signs (VMS) messages can be displayed (Page 66); and investigating whether the Traffic Officer service could be rolled out to the busiest 'A' roads (Page 68). These last two can play a crucial role in serving customers better when

caught up unexpected, lengthy delays - a key part of the improved incident response for which we have been pressing.

At present, Highways England is responsible for clearing litter on only motorways. Transport Focus's *RIS2 Priorities* highlighted the desirability of transferring responsibilities for litter clearance on 'A' roads from district/unitary councils to Highways England so that the problem of roadside litter can be more effectively managed. DfT refers (Page 11 of the consultation document) to developing a new performance indicator. This should drive more effective action by Highways England to fulfil its existing remit, but wider improvement may be limited without formal change of responsibility on 'A' roads.

(c) the infrastructure priorities (initial report section 5.2)

We support Highways England's desire to avoid minimal, reactive maintenance, and welcome its recognition that customers place a high priority on key assets being in a good state of repair. The preferred approach of investing more in road surface condition to intervene earlier, or renew to a deeper level, should help address the user concerns highlighted in "*Road Surface Quality: what road users want from Highways England*"², research carried out in partnership with Highways England. However, it is disappointing that there is no proposal for a dedicated 'renewals backlog' fund, to deliver a public commitment to comprehensively meeting a new road user-focused standard by the end of Road Period 2. We also note that there is no explicit reference to ensuring signs are visible, for example not obscured by vegetation, as well as being in a good state of repair.

(d) the investment priorities (initial report section 5.3)

We recognise the crucial role of investment in expanding capacity or making better use of what already exists to maintain journey times for users, and the reliability of those times. We are pleased that the continued roll-out of smart motorways will take full account of recommendations from the House of Commons Transport Select Committee, and from Transport Focus's research report "*Getting to the heart of smart – road user experiences of smart motorways*"³. We believe strongly, however, that Highways England should renew its efforts to increase user input to scheme design, smart or otherwise, engaging with all types of road user as a matter of course from the inception of a scheme. Our work with Essex and Suffolk Council Councils "*The A120 between Braintree and Marks Tey – road users' experiences and desired improvements*"⁴ illustrates the value of early road user involvement. Engagement should include the final stages of scheme delivery, seeking, and acting on, user views about minimising the impact on them during construction.

(e) a local priorities fund (initial report section 5.3.8)

We encourage a continued focus on smaller-scale schemes which can bring significant journey time and safety benefits to users.

(f) the future studies (initial report section 5.3.11)

We support these proposals, but please see our response to Question 7 below regarding integration.

² <https://www.transportfocus.org.uk/research-publications/publications/road-surface-quality-road-users-want-highways-england/>

³ <https://www.transportfocus.org.uk/research-publications/publications/getting-heart-smart-road-user-experiences-smart-motorways/>

⁴ <https://www.transportfocus.org.uk/research-publications/publications/a120-braintree-marks-tey-road-users-experiences-desired-improvements/>

(g) the designated funds (initial report section 5.4)

The proposed new structure of Designated Funds brings an increased focus on the concerns of users. We welcome the proposal for a roadside facilities fund (while noting, see response to Question 2 above, the need to focus on lorry parking capacity), but urge Highways England to inform its use by first developing an updated strategy for the provision of high-quality facilities across its network. Transport Focus recommends that DfT is explicit in the RIS that road side facilities are integral to safety and customer experience using the SRN and so a legitimate, necessary area for Highways England to play a part.

It is disappointing that our recommendation has not been taken up that there be a Designated Fund to focus on the needs of bus and coach users of the SRN, whether they be passengers or the operators themselves, although we note that this is mentioned under the Connecting Communities fund. We encourage DfT to reflect on the value a separate fund could bring.

(h) the performance measures and targets (initial report section 6.3)

In March 2017 Transport Focus published “*Measuring performance of England’s strategic roads: what users want*”⁵, research conducted in partnership with the ORR, to understand what road users felt should be measured and targeted in the Road Period 2 performance specification. Since then we have been working via the DfT-led Performance Specification Working Group to ensure that the specification focuses on the things that matter to road users; and measures success in the way road users define it. A strong message from Transport Focus is that just because something is not fully within Highways England’s control, does not mean it shouldn’t have a challenging but achievable target. Key areas where the Performance Specification must deliver for road users include safety, journey time reliability, road surface quality and information.

Question 5: Are there any other proposals that you do not agree with? If so, which ones and what could be done differently?

No.

Question 6: Do you agree with Highways England’s assessment of the future needs of the strategic road network? (See Initial Report section 4.4.)

We support the Initial Report proposals, in particular recognition that the SRN must be ready to accommodate connected and autonomous vehicles and those powered by electricity. Our plea is that Highways England ensures that road users’ views are sought and taken into account as it seeks to meet future needs.

Question 7: How far does the initial report meet the government’s aims of economy, network capability, safety, integration and environment? Which aims could Highways England do more to meet and how?

Transport Focus represents the interests of users of the SRN and does not take a view on how the Initial Report aligns with government aims. However we make the following observations:

⁵ <https://www.transportfocus.org.uk/research-publications/publications/measuring-performance-englands-strategic-roads-users-want/>

- All five government aims are furthered by a focus on operation, maintenance and renewals of the existing SRN. Effective management of day-to-day traffic flows is the precondition for maintaining or improving network capability, and hence providing the service needed to support the economy.
- Safety. The summary of investment priorities for 2020-25 starts with ‘safety first’ (Page 85) but there is little in the way of explicitly safety-focused proposals in the detail. There are only two references in the whole section to the needs of cyclists, pedestrians and equestrians, and those in the context of alternative provision alongside expressways and of the Connecting Communities fund. We highlight a risk of diminishing the focus on safety by dropping the word from the existing Cycling, Safety and Integration fund, and the absence of the single-focus safety fund we had recommended.

We welcome the prominence given to current work to tackle the problem of ‘wrong way driving’ which Transport Focus has highlighted, and expect this to form part of the general commitment for Road Period 2 to improve infrastructure to reduce the likelihood of – or consequences of – drivers making mistakes. However we made two other recommendations about safety that are not picked up in the Initial Report:

- We suggested that Highways England should consider options for further investment in equipment that helps the police enforce traffic law proportionately; the proposals currently contain nothing more than a general undertaking (Page 41) to support the police in their enforcement activities.
- We recommended establishment of an independent accident investigation function for roads, but this is not discussed in either the Initial Report or the consultation document.
- Integration. Highways England commits to delivering seamless journeys, but this will need a more ambitious programme than the current plan to update trials of traffic management coordination with a local authority (Page 68). And while we are encouraged by the focus on non-SRN diversion routes and the need to invest to bring them up to agreed standards, there is no reference to the suggestion in our *RIS2 Priorities* that agreement be reached with the operator of the M6 Toll to exploit its full potential as a diversionary route when the original M6 – one of the most congested sections of the SRN – is disrupted.

Question 8. Do you think there should be any change in the roads included in the SRN? (See consultation document, section 1.3) Which roads would you propose are added to, or removed from, the SRN, and why?

Transport Focus makes three comments in this area, noting DfT’s separate consultation about creation of a Major Road Network (MRN) alongside the SRN:

- Irrespective of the outcome of the MRN consultation, we encourage Highways England to use the origin and destination data to determine where significant volumes of traffic use a section of local authority road in the ‘middle’ of an otherwise predominantly SRN journey – all, that is, apart from the ‘first mile, last mile’. High volume ‘middle sections’ should be considered for incorporation into the SRN so that one organisation, Highways England, is responsible for providing the service to road users on what are likely to be strategic, through journeys.
- In our *RIS2 Priorities*, we highlight that small adjustments might be made to the boundary between the SRN and local roads at junctions, to place all parts of the junction

under the control of Highways England. We continue to believe this would improve safety and user experience; the absence of one organisation 'owning' these aspects at a junction is unlikely to lead to the best outcomes for users.

- Also in *RIS2 Priorities* we highlight that short sections of currently-local authority road between the SRN and official service areas should be 'trunked'. Because of the volume and nature of traffic using them they are often in poor condition. We believe that from a safety and customer experience perspective Highways England should 'own' the whole journey experience.

Question 9. Is there anything else we need to consider when making decisions about investment in the network? What other factors do you want considered?

No.

Question 10: Does the analytical approach taken have the right balance between ambition, robustness, and proportionality? (See chapter 6 of consultation document). What do you suggest we do differently?

The Analysis Strategy paper states that DfT is working closely with Transport Focus to ensure the user perspective is being built into everything it does. We are pleased to do so and wish to develop this cooperation to include Highways England as well as DfT. The paper identifies five priority areas for investment (road surface quality, information provision, coverage of the Traffic Officer service, roadside facilities, and bus and coach facilities) where the analytical approach needs to be improved. We recognise that analytical capability in some of these areas is in its infancy, but stress the need to take this work forward as soon as possible to ensure that analytical tools better reflect road users' interests by the time planning for Road Period 3 starts in 2-3 years from now. It is important that analysis reflects the impact on existing users during construction, so Highways England is incentivised to implement works in the least disruptive way.

**Transport Focus
February 2018**