

RIS3 SRN Initial Report Consultation
Department for Transport
Great Minster House
33 Horseferry Road
LONDON SW1P 4DR

RIS3Consultation@dft.gov.uk

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Transport Focus response to DfT's consultation: Shaping the future of England's strategic roads

Introduction

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) managed by National Highways on behalf of the Department for Transport (the Department)). We have already provided our [recommendations](#)¹ to Government about priorities for the third Road Investment Strategy (RIS3) from a road user perspective. Our recommendations were informed by extensive [research](#)² among road users which we published in 2021. This response is shaped by how well we feel National Highways' Initial Report addresses our recommendations. There is much to welcome in the Initial Report, but there are areas in which we believe it should be stronger from a road user perspective. In drawing up RIS3 the Department should ensure that it is guided by road users' interests and priorities.

Key message:

The SRN must first and foremost meet the needs of those who use it, and so the RIS3 process must put road users at the heart of planning for the next Road Period. Transport Focus' recommendations set out what should be required from National Highways to achieve this. All our recommendations are important, but heading the list are those which relate to road users' top priorities for improvement to SRN journeys (improved quality of road surface; safer design and upkeep of the network; better management of roadworks) and to increasing satisfaction with journey time as the factor with greatest influence on overall satisfaction.

The Initial Report does not in our view sufficiently prioritise these outcomes in its proposals; the RIS itself needs to have a clear focus on ensuring better, safer journeys, and on specifying what improvement the Department expects to see. In doing so, care must be taken to ensure that service from the SRN is attuned to the needs of different groups of users: meeting the needs of the freight sector is at the heart of the rationale for the SRN, but investment must also ensure a better experience for older drivers, cyclists, walkers and others.

¹ [Putting road users at the heart of the Road Investment Strategy for 2025-30, published October 2022](#)

² [Road users' priorities for improvement to journeys on England's motorways and major 'A' roads](#)

And there is a need for greater clarity on the ambition for integration, with a firmer commitment to achieving seamless connection with the rest of the road network and to encouraging more sustainable use of the SRN, including on bus and coach services.

Question 1 – DfT Strategic Objectives

Question 1 asks what importance we give to each of the strategic objectives set by the Department; we endorse all six. As the consultation document notes, Transport Focus had established from research with a wide range of road users in 2021 that the objectives, then in draft, aligned with what they felt were the most important priorities, with *Network Performance* most front-of-mind. We welcome the Department’s specifying this is to *Meet Customer Needs*, and its focus on infrastructure condition not for its own sake but to ensure the network can support reliable long-distance journeys. The confidence that that will give business users in particular underpins another prominent objective, *Growing the Economy*. But *Improving Safety for All* must be at the forefront of the strategic objectives: completing a journey safely is an underlying consumer requirement of any transport system.

Question 2 - Network extent

We note the list of roads proposed for trunking and de-trunking. Transport Focus encourages the Department to work with National Highways to ensure that this is a data-driven exercise using origin and destination information to determine where there is significant use of local authority-managed roads, including by lorries, as part of otherwise strategic road network journeys and bringing forward trunking proposals on that basis. This will ensure that one organisation is responsible for providing the whole service for a larger proportion of strategic journeys, including by the freight sector.

We also remind the Department of the safety and user experience benefits of one organisation having responsibility for all elements of junctions with the SRN, pointing to the benefits of making minor adjustments to current boundaries. And also of the consistent, higher standards road users would be likely to experience on their strategic journey if short sections of local authority-managed road between ‘services’ and the current SRN boundary were managed by National Highways.

Question 3 - the National Highways approach

In respect of Question 3, National Highways’ choice of three focus areas for its long-term vision rightly follows up the customer-centric approach set by the Department. However we feel that the focus gets lost in transition to the five core themes for *Planning for the Third Road Period*. The user rationale does not seem to be central to *Making the Most of our Network*, and there is no sense of ambition for reducing delay and improving reliability (even though satisfaction with journey time has greatest influence on overall satisfaction). The long-term vision section of the Initial Report refers to the aim of customers enjoying ‘stress-free end-to-end journeys’, but this is not developed as an idea or explicitly brought into the plans for RIS3.

In summarising its proposals, National Highways returns to focus on network performance to meet customer needs, but its overall proposition is in our view weakened by missing that linkage to the three focus areas. This is surprising given the care with which extensive

insight work by both Transport Focus and National Highways is explained (although user needs are unhelpfully classed as part of ‘wider priorities’ rather than the core rationale for the SRN). And it is disappointing that the Initial Report does not refer to the recommendations that Transport Focus made in 2022 for putting users’ interests at the heart of planning for RIS3. However, we are pleased that several of the initiatives we recommended do feature in the specific proposals. And we are encouraged that DfT’s Analytical Approach document which accompanies this consultation asserts that our recommendations have been built into the analytical framework.

Furthermore, Transport Focus thinks it essential that the RIS reinforces the close relationship between network performance and service to the customer; and sets targets for delay and reliability to ensure better journeys for SRN users.

Turning to specific aspects of the three core themes that most directly embrace the user interest:

Question 4 - improving Safety for All

We welcome National Highways’ proposal to target safety interventions on reducing the risk on roads rated 1-star and 2-star by the International Road Assessment Programme (iRAP), and on its all-purpose trunk roads more generally. Little detail is given under this theme heading of what form these interventions should take, although the outlined programme of ‘route treatments’ should make a valuable contribution to raising performance against the iRAP measure. Recent insight work by Transport Focus has, as noted in the Initial Report, found a clear user preference in enhancement projects for smaller-scale schemes such as these. It will be important however to also make improvements more extensively on ‘A’ roads, paying attention to clarity of signing and road markings.

We agree that there should be a debate around the role of speed in helping to deliver the zero-harm ambition alongside that of facilitating fast and reliable journeys.

- *We ask the Department to note that Transport Focus made recommendations under two headings: Safer Design and Upkeep, where only some of the issues have been picked up in the Initial Report; and Better Behaved Drivers, which features more strongly in the Initial Report but misses specific proposals we have made*

Question 5 – Making the Most of our Network

The failure of the Initial Report to position this theme as a core part of service to the customer results in insufficient attention being paid to users’ priorities from their experience of the network. Reference to asphalt road surfaces alludes to our consistent research finding that improved surface quality is users’ top priority for improvement to journeys on the SRN. Yet that is not followed through into the consideration of concrete surfaces. And there is no reference to working towards making the new ride quality metric a future key performance indicator for the network as road users might reasonably expect.

We are also disappointed that, in running through the different asset types making up the SRN infrastructure, key components such as road markings and street furniture get

mentioned only as ‘other assets’; these are highly visible aspects of National Highways’ work for users, and improving rather than just maintaining current overall levels of condition could make a significant contribution to safety as well as to user experience.

- *We ask the Department to note that there is little on the issues raised in our recommendations on Improved Quality of Road Surface or Increased Reliability / Shorter Journey Times: we are particularly concerned at the lack of proposals around welfare and diversion routes, or of improving journey times and reducing delay from roadworks.*

Question 6 - Evolving our Customer and Community Services

A significant weakness of the Initial Report is the decision to group road users, communities and other stakeholder interests into one theme, weakening the laser focus we believe is needed on the *users* of National Highways’ product. ‘Non-motorised users’ are presented as distinct from ‘road users’, which seems to refer only to drivers and passengers in cars and vans, apparently ignoring motorcyclists.

RIS3 will need to take greater account than is apparent from the Initial Report of the diversity of road users, including but by no means only the needs of disabled drivers and increasingly, in an ageing population, of older drivers.

Serving the freight and logistics sector is at the heart of the rationale for the SRN, and yet there is no compelling narrative about how National Highways will pursue this. Operators’ specific needs are identified, but the Plan for RIS3 gives insufficient prominence to responding to them. There is no sign of a strategy to meet the needs of the freight sector as a whole, and action on roadside facilities and lorry parking deserves greater urgency than is currently implied.

Increasing integration of the SRN with other transport modes and infrastructure is an important element in this theme. We applaud the headline commitment in the 2050 vision for the SRN as ‘part of a seamlessly integrated transport system that meets our customers’ needs’, but are concerned about the lack of substantive proposals to move towards this in RIS3. We see three distinct dimensions of integration, all requiring firmer action than the Initial Report sets out:

- Integration with bus, coach and rail services warrants more than ‘further consideration’ of options for promoting Park & Ride and for increasing occupancy of bus and coach services to boost the efficiency of SRN corridors at peak times.
- Integration with, and encouragement of, active travel. A long-term plan to create segregated provision for riding, walking and wheeling on SRN corridors needs to start in earnest in Road Period 3.
- Integration of the SRN with the local road network for the benefit of all users. It is good to see that the emphasis in the proposal for more locally focused enhancements is to be ‘on the edges of the network’; this should entail specific action to address delays and safety shortcomings when getting on and off the SRN.

Effective use of technology is a running theme in the Initial Report, but particularly prominent under the Customer and Community Services theme; it is right that it is seen as a means to an end rather than an investment area in its own right. The Initial Report refers to the opportunities from 'digital connectivity'; the RIS will need to be more specific about National Highways' role in developing infrastructure-to-vehicle services, which have the potential to transform the information available to drivers.

- *We ask the Department to note that Transport Focus recommendations cover a wide range of aspects of improving customer service. The Initial Report picks up some of these around Freight and Logistics and Active Travel, along with Electric Vehicles and Park & Ride. We are particularly disappointed, though, how few of our recommendations around Bus/Coach and Technology are reflected in the Initial Report.*

Question 13 - Analytical approach

We strongly support the enhanced analytical approach set out for RIS3, and the commitment to create a line of sight between investment and outcomes that customers care about. It is important to increase understanding of the impacts of interventions on road users and the quality of their journeys, with a particular focus on operations, maintenance and renewals expenditure. We are keen to continue working with the Department on the development of performance metrics such as journey time reliability to more directly reflect how road users consider aspects of their SRN journey.

Transport Focus
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