DfT Shaping the Future of Englands Strategic Roads (RIS2)

7 February 2018

https://www.gov.uk/government/consultations/shaping-the-future-of-englands-strategic-roads-ris2

This consultation response is on behalf of the London Cycling Campaign (LCC), the capital's leading cycling organisation with more than 12,000 members and 30,000 supporters. This response was developed with input from representatives of LCC's borough groups.

This response is in support of the points raised by Cycling UK's response on this consultation.

As a London-based organisation we think it is worth noting, at the outset, that the capital's authorities (in the draft Mayor's Transport Strategy 2017 and London Plan 2017) have concluded that key to achieving what the London Mayor describes as "good growth" is a modal shift away from private motor vehicle use to public transport, walking and cycling. This is essential, and strongly supported by LCC, to secure the future economic success of the capital which gains from the improved transport capacity created by road space reallocation to "more efficient modes," as well as better air quality and public health.

Instead of building more roads to meet anticipated traffic growth, London is seeking to reduce traffic by 3 million vehicles per day in a period when the population in expected to increase by over 15% (from 8.6 million to over 10 million). This will help reduce congestion, yet cater for the growing transport needs of the city.

As well as investment in public transport infrastructure such as "Crossrail", London (as well as in some other major capitals) is reallocating road space from private motor vehicles to walking and cycling – with large traffic interchanges being redesigned and traffic lanes replaced with cycle tracks and wider pavements.

We note that the CEOs of 180 London employers supported a major cross-London cycle track because of the knowledge that their employees need access to fast, efficient, healthy transport. Developers report that clients no longer demand more car parking spaces but instead ask for cycle parking. At the east London Westfield shopping centre a floor of car parking space is being converted to shops because the anticipated demand for spaces was lower than expected.

We note also that essential elements of the draft London Plan include world-class broadband infrastructure, an improved rail system and improved town centres that enable development without increasing the need to travel by car.

This approach will be increasingly vital to ensure not just an efficient transport system that works for all users, across all modes, but for our health as a nation too.

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

Given well-established issues around “induced demand” that the RSI2 document itself mentions, then increasing capacity on the Strategic Road Network (SRN) may deliver in the short-term what some users say they want, but in the medium to long-term, is unlikely to deliver what the majority of users will want and need – an efficient transport system.

Measuring the efficiency of a transport network by private motor vehicle journey times is not likely to tackle the many pressing issues that are also vital to incorporate into any understanding of transport planning – climate change, congestion, pollution, inactivity etc. And simply building more roads has been shown time and again to simply create more private motor vehicle journeys, and thus more congestion, pollution, climate change, inactivity and other negative externalities. The only viable alternative is to prioritise spending strategically, and holistically, on sustainable and active travel modes.

In summary, instead of building and improving long-distance roads, the government’s priority for DfT spending should primarily be to enable many more people to walk, cycle and take public transport for far more journeys. This would, in turn, reduce the need for improvements to the SRN for the primary benefit of private motor car journey times.

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

The efficient transport of freight and other materials vital for business should also be planned to be as sustainable and efficient as possible as a priority, rather than to maximise network capacity. This may mean enabling and encouraging more consolidation, last-mile cargo bikes and other methods of delivery as a priority, or encouraging re-timing of deliveries, or other modes (train, boat etc.) again over simply improving overall private motor vehicle capacity on the SRN.

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?

The existing SRN demonstrably has severed many communities. This in turn has encouraged more development of housing, employment centres and other amenities designed primarily for arrival to/departure from/ servicing etc. by private motor vehicle. Schemes that increase private motor vehicle capacity on the SRN will only exacerbate such issues and spread them.

Given this, priority should be given to fixing current severance issues and enabling far more of those people living near to the SRN to make journeys by other modes than private motor vehicles. Any new SRN schemes and any new housing etc. development near the SRN should also be done with the priority of not introducing any further severance or reliance on private motor vehicles.

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)

As above, increasing capacity for private motor vehicles should be a tool of last resort in transport planning, given the negative externalities of such an approach. Rather than focus on developing Expressways, the government should focus on “cycle-proofing” the SRN, and boosting public transport, with the priority being to enable far more journeys currently happening on the SRN to be done by other modes.

Given this, the document should have clearly highlighted that all SRN development must use Interim Advice Note 195/16, “Cycle Traffic and the Strategic Road Network” at the very least.

Operational priorities (Initial Report section 5.1)

Operational priorities such as seamless journeys and journey time reliability are important, but should be considered across all modes, with a view to improving the efficiency of the wider transport network, not the efficiency of private motor vehicles (often to the detriment of other modes and the public).

As the DfT’s own study shows, spending on cycling offers far better benefit-to-cost ratios than road building schemes – and as recent experience in London shows, when done well, enables the more efficient movement of people on the transport network.

Infrastructure priorities (Initial Report section 5.2)

As above, and as advocated by Cycling UK and Campaign for Better Transport, the priority should be “fix it first”.

Future studies (Initial Report section 5.3.11)

The priority here should be on finding ways to rapidly move far more journeys from private motor vehicle journeys on the SRN onto other, more sustainable modes. On that basis, study of “last mile” and “integration hubs” would be welcome, but studies and schemes designed primarily to increase SRN private motor vehicle capacity, particularly as a first priority, are not welcome.

Performance measures and targets (Initial Report section 6.3)

New targets and metrics are urgently needed to steer the government, DfT, transport planners and those using the road network and SRN away from the current car-dominated norm and towards envisioning the broader transport network holistically, with efficiency across the entire network and externalities of the network included. Care must also be taken to not misguidedly create metrics that act against the priorities of more sustainable and active travel. For instance, measuring collisions with those cycling and walking in itself can incentivise the creation of hostile road environments where no one walks or cycles; what is needed is data on collisions per journey by mode for the SRN.

Other metrics could include predicted health outcomes for new schemes (using the WHO’s HEAT tool), scoring systems such as TfL’s Cycling Level of Service or Healthy Streets Check to assess new schemes on their likely outcomes for active travel, predicted and measured mode shift and increase in journeys by mode etc.

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?

Again, "predict and provide" is another way of saying "induced demand". The National Transport Model (NTM) predictions assume that it is acceptable to simply follow the growth of motor vehicle use, rather than restrict it, charge for it, and provide alternatives. And, as Cycling UK points out, the NTM has been wrong before – predicting private motor vehicle traffic growth that has not been realised.

In a densely developed and populated country, road capacity increases will be increasingly difficult to achieve as well as, as already detailed, increasingly negative in effect. Instead, alternative approaches must be prioritised – from changing the way we move goods and people around, to the places people live and work and how these connect.

In London, our Mayor and transport authority increasingly are moving to an approach that restricts capacity for private motor vehicles and reprioritises that capacity towards more sustainable and active modes. This approach is popular with the population and is also increasingly seen in other large UK cities – such as Cambridge, Manchester, Glasgow etc. Similar approaches, but adapted for more suburban and rural areas, should be the priority.

Even outside of urban areas and between them, the idea that private motor vehicle capacity on roads is needed for regional and sub-regional growth is wrong-headed. There are again far more effective ways of generating growth than investing in road capacity even when looking outside our urban centres – trains and other public transport, high-speed digital connectivity, bus networks, improvements to design of housing and other major developments, as well as walking and cycling schemes to suburban and rural transport hubs.

On top of this, the models of the NTM appear to take little account of already-changing models of transport usage, living and technology. Autonomous vehicles, homeworking, mobility-as-a-service, e-bikes and other new technologies and approaches will very likely disrupt long-term predictions for motor vehicle usage and long-distance network usage or importance.

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?

The strategy will over-deliver on network capability (by focussing too narrowly on private motor vehicle capacity), but will not meet the other and more pressing aims of the RIS2.

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?

The SRN should be re-planned within a broader context of transport planning medium and long-term for far more sustainable and active travel.

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?

Any scheme in RIS/RIS2 and on the SRN should go through a process to assess its knock-on impact on the broader transport network and on sustainable and active travel. For instance, many SRN roads terminate on the periphery of London. Any changes to these roads could result in far more private motor vehicle traffic (or conversely far more traffic by other modes) arriving into London – and as such, impacts for each scheme, and collectively the SRN network, beyond the boundaries of the scheme itself, should be rigorously assessed before anything moves forward.

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?

As above, given the failure of the NTM in the past to predict motor traffic growth accurately, given the likely technological disruptions to the transport network already visible, and given the pressing need to move far more journeys from private motor vehicles to other modes, the current plans are not proportional or robust.

General points:

- Providing space for cycling is a more efficient use of road space than providing space for driving private motor vehicles, particularly for journeys of 5km or less. In terms of providing maximum efficiency for space and energy use, walking, cycling, then public transport are key.

- As demonstrated by the success of recent Cycle Superhighways and mini-Holland projects etc., people cycle when they feel safe. For cycling to become mainstream, a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic is required to/from all key destinations and residential areas in an area. Schemes should be planned, designed and implemented to maximise potential to increase journeys – with links to nearby amenities, residential centres, transport hubs considered from the outset.

- Spending money on cycling infrastructure has been shown to dramatically boost health outcomes in an area. Spending on cycling schemes outranks all other transport mode for return on investment according to a DfT study. Schemes which promote cycling meet TfL's "Healthy Streets" checklist. A healthy street is one where people choose to cycle.

- All schemes should be designed to enable people of all ages and abilities to cycle, including disabled people.

- LCC wants, as a condition of funding, all highway development designed to London Cycling Design Standards (LCDS), with a Cycling Level of Service (CLoS) rating of 70 or above, with all "critical issues" eliminated.