



Response of the Road Haulage Association to the Department for Transport.

“Roads Investment Strategy 2”

**6th February 2018
V.2**

Summary

1. The Department for Transport and Highways England are now planning for Road Investment Strategy 2 (**RIS2**). RIS2 is the programme of major improvement projects for the Strategic Road Network (**SRN**) and the Major Road Network (MRN) that covers the period 2020 to 2025.
2. Highways England has produced an initial report that sets out their assessment of the current state of the SRN, its potential future needs and their proposed priorities for RIS2.
3. The Department for Transport is consulting on the proposals made by Highways England in the SRN initial report, in particular whether the analytical approach is sufficiently robust and whether they have heard the full range of views that should be incorporated into the RIS2 programme, including about the shape of the SRN

Background about the RHA

4. The RHA is the leading trade association representing road haulage and distribution companies, which operate HGVs as profit centres. Our 7,000 members, operating near to 100,000 HGVs, range from single-truck firms to those with thousands of vehicles. These companies provide essential services on which the people and businesses of the UK depend.
5. We proactively encourage a spirit of entrepreneurship, compliance, profitability, safety and social responsibility. We do so through a range of advice, representation and services, including training.
6. We would like to thank the Department for Transport for the consultation and the opportunity to comment on the issues raised.
7. In addition to answering the questions directly we have added further comments on related issues where we feel these are relevant.

General Comments

8. The movement of goods (regardless of how it is done) is fundamentally important to the economic performance of the UK. The competitiveness of UK business is directly impacted by the costs and efficiency of freight transportation. In terms of road freight that includes the serious and worsening impact of congestion and unreliable journey times for road haulage operators.
9. Improving journey times generally, reducing unreliability and completing infrastructure upgrades as quickly and efficiently as possible will be a key task in delivering RIS2.
10. The current Road Investment Strategy (RIS1) programme will end in 2019, it consisted of 112 Major Improvement projects. To date 12 have been completed and 20 more have been started. A number of other projects have been halted, or reconfigured, following re-evaluations.
11. The patchy delivery of RIS1 does give rise to concerns over RIS2.

Responses to the Questions

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

Users want improved performance from the SRN, the proposals should deliver improvements, but we would point out to Highways England they need to take into account a number of factors.

Congestion and consistent journey times are the top key issues for the road freight sector. In addition, facilities for operators and drivers using the SRN are critical. There are too few lay-by and other rest facilities.

There is a lack of resilience across the network. When incidents happen the ability to continue to operate within reasonable limits is diminishing. There should be clear and effective alternative routes on key parts of the network.

The RHA is not confident that congestion and unreliable journey times will be eased. Programmes take too long and disruption during construction processes and roadworks needs significant improvement.

In 2006 the RHA identified a list of the 15 “pinchpoints” of most concern to the Road Haulage Association:

- The A2 from Lydden to Dover
- The A20 Townwall Street, Dover
- The A12 onto the A120 towards Harwich
- The A14 from Huntingdon to Cambridge and then again from Cambridge to Felixstowe
- The A63 through Hull Town Centre
- The A562 / A533 Widnes / Runcorn Mersey Crossing

- The A36 Salisbury Ring Road
- The A33 / A3025 Southampton
- The A350 Poole to Warminster
- The A299 Ramsgate
- The A40 St Clears to Fishguard
- The A282 Dartford Crossing
- The A19 Tyne Tunnel
- The A187 to Newcastle International Ferry Terminal

In the intervening period the Runcorn Mersey crossing and A229 have been improved, we do not consider tangible improvement has been made to the others. It has taken ten years to start the A14 Huntingdon to Cambridge section. RHA members have specifically mentioned access to the port of Dover, as the main cross channel crossing route, as a problem area.

Operation STACK is an example where the SRN has no resilience and surrounding roads cannot cope with situations where Op STACK is implemented. The failure of the Stanford West parking area illustrates the lack of priority that is being given to freight and the need to deal with predictable disruption events in key locations.

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

Please see the answer to Question 1.

In the Transport Focus study in 2016 the Number one priority for everyone was the road surface. Highways England did have a target some years ago that 80% of the SRN would be Tarmac. We still have major sections of concrete which are noisy and which produce large amounts of surface spray when it rains – does not make for pleasant driving conditions.

We could see quicker roadworks and more priority being given to increasing capacity and resilience more quickly. The demand for freight is driven by the consumers and businesses in the UK, it is of critical importance for the competitiveness of the UK that we have an infrastructure that works effectively for goods transport.

Ways to improve the time to reopening roads following incidents and collisions should be investigated, as a priority. The Department for Transport estimated the cost to the economy of unforeseen closures was £1bn in 2011.

Improvements on different roads operated by different stakeholders, with separate budgets, should be considered. This will require a lot of management and interaction to obtain effective and joined up solutions – but this should be selectively considered.

Communication of overnight road closures and diversions arising from closures needs to be improved, together with diversion signage on diversion routes which are operated by local authorities.

Corridor studies were undertaken some years ago. There is a need to understand end to end journeys irrespective of road classification. This is particularly relevant when adverse weather conditions occur. The SRN may be cleared from snow and ice but the more local roads leading to the SRN are not, leaving vehicles unable to move from their depots.

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?

More can be done to improve the visual surroundings of infrastructure, as in the Lower Thames Crossing proposals. Screening with earth banks has been successfully used and is encouraged where this will improve public acceptability of proposals. Highways England should consider noise barriers and mitigation of light pollution and quiet road surface material e.g. M25 junction 9, planning condition by Mole Valley District Council to use porous asphalt.

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

i. Four categories of road and the development of Expressways (Initial Report sections 4.4.3 and 5.3.6)

Expressways provide an alternative and effective option to support the SRN. There is considerable evidence to show that duelling and expressways will moderate traffic congestion, improve air quality and improve journey times.

ii. Operational priorities (Initial Report section 5.1)

The operational priorities do largely reflect the priorities of the RHA members. The top one of the operational priorities is the need to support more reliable journeys. We do not see the preparation for autonomous vehicles as an operational priority at this time (although it is something that needs to be considered for enhancements and infrastructure).

iii. Infrastructure priorities (Initial Report section 5.2)

Vehicle restraint systems have proved their value in preventing cross-over collisions.

Road surfaces are inconsistent and of different quality. Pot hole identification and repair must be a priority. These are the potential cause of collisions where drivers take avoiding action to prevent damage to their vehicles.

Road signage can be used to reduce congestion and improve air quality by offering alternative routes, when there are known delays.

Where STGO movements are likely to take place around Critical National Infrastructure sites, the approach roads must be designed and this includes street furniture, to accommodate the size, both physical and weight of vehicles conveying plant to these sites.

iv. Enhancement priorities (Initial Report section 5.3)

The RHA agrees in principle with Enhancement priorities.

v. A local priorities fund (Initial Report section 5.3.8)

We strongly welcome the local priorities fund. Ensuring the SRN is well supported by high quality local roads will help network resilience.

Parking provision and welfare facilities should be made a planning condition on new developments.

vi. Future studies (Initial Report section 5.3.11)

There are a number of key locations that require urgent remedial work these include the Birmingham Box, where a study is currently in progress. The M6 at J7 is a hotspot, as is the M25 / J15 at Heathrow. The A69 and A66 should be dual-carriageway their whole length.

vii. Designated funds (Initial Report section 5.4)

The provision of roadside facilities, especially lorry parking is a major consideration on any development. Lorry parking has been neglected and urgent provision must be made. The problem is particularly acute in the south east and Kent.

viii. Performance measures and targets (Initial Report section 6.3) If you disagree with any of these, what could be done differently?

Journey time would be a significant indicator and would demonstrate improvement, or deterioration of network performance. Journey time variation is a vital measure that will highlight places of distress.

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?

No.

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?

The RHA considers that technological advances make it difficult and costly to anticipate what will be available or required in ten years' time. Investment should be made for systems that are available in the foreseeable future, not for speculative systems that have yet to be developed or shown to be a viable long term requirement.

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?

Congestion and consistent journey times are key issues. Traffic volumes continue to increase across the network and in and around many urban areas. All major city routes are heavily congested, especially at peak hour times.

Highways England should look more closely at using technology for example dynamic traffic light phasing. This has already been considered in Liverpool when a ship comes in and discharges. The major routes are given priority and dwell times increased or decreased accordingly. This keeps the lorries moving and reduces emissions. Traffic flows on the M5 in the holiday season would benefit from these measures, so that commercial vehicle operations transporting perishable goods are less impeded.

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?

Feedback from members highlighted the following;

- The A15 should be added for the entire length, this is a north / south resilience route on the east side of the A1.
- A4123 should be added to provide relief to the M6.
- A457 should be added, this is an east west link to the west of Birmingham.
- The A515 should be added, this is a resilience route for the A38 and A50 and needs to be able to effectively carry freight traffic.



The Road Haulage Association

There are a number of roads suggested by members that most appropriately be part of the New Major Road network. These will be highlighted in March when we reply to the Major Road Network consultation.

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. In addition, in relation to the analytical approach summarised in Chapter 6 and set out in more detail in the strategy document accompanying this consultation:

The movement of freight is a fundamental requirement of a modern society – the competitiveness of all businesses, and indeed the UK as a whole is dependent upon efficient freight movement. Most freight moves by road, and the SRN in particular. Its use of the SRN is less concentrated on time of day than private vehicle use. Need to look at what else is being built as part of the growth agenda e.g. Port Expansion, Railheads, Logistic Parks, RDCs. These plans will drive what additional investment is required in the SRN.

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?

All programmes and projects must be deliverable. RIS1 was too ambitious and speculative, many of the objectives have not been delivered. It would be fair to assume that money has been spent with minimal return on those projects which have stopped or deferred.

Final Comments

12. The RHA will continue to discuss RIS2 issues with the Department for Transport and Highways England up to and after the commencement in 2020.

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