



National Highways Strategic Road Network Initial Report

Response on behalf of National Parks England

National Parks England exists to support policy and practice by coordinating the views of the eight English National Park Authorities (NPAs). We do this by:

- Providing a collective voice for the views of the English NPAs
- Raising the profile of the work of the authorities to policy makers, Parliamentarians and other decision makers
- Facilitating discussions amongst NPAs on issues of common concern
- Supporting the development and capacity of the NPAs to effect change
- Working in partnership with other bodies where this adds value.

The work of National Park Authorities is directed towards the fulfilment of two statutory purposes as set out in the National Parks and access to the countryside act (1949) and restated in the Environment Act (1995); these are: -

- i) To seek the conservation and enhancement of the landscape, wildlife and cultural heritage of the National Park, and
- ii) To promote opportunities for the enjoyment and understanding of the special qualities of the National Park

National Park Authorities also have a statutory duty to seek to foster the economic and social well-being of local communities within the National Park.

National Parks England welcomes the opportunity provided by National Highways to respond to the Strategic Road Network Initial Report. The following response has been brought together by Officers of the National Parks England Transport Group and focuses on the areas of the document pertaining to the priorities of the National Parks.

Overall, there are a lot of good parts to be found within this initial report, in particular the pledge towards a 'Decide and Provide' approach and the emphasis given to environmental and decarbonisation goals. There are still a number of concerns and areas where we believe that a more ambitious plan can be set out for road period 3, and beyond, especially as National Highways (NH) has set a goal to evolve their remit as a highway operator. While our focus is on the environmental, landscape, NMO and decarbonisation approaches, we concur that safety is an essential focus.

Introduction and Overview

It is noted that NH has recognised that 'Predict and Provide' is not an appropriate paradigm of forecasting and we are happy to see a pledge towards using a 'Decide and Provide' approach as advocated by TRICS and a number of Sub-National Transport Bodies (STBs). It should also be noted, however, that while there is much quoting of 'Decide and Provide' there needs to be a clearer statement of what future NH is deciding upon. There is a concern that being

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built on trend/horizon scanning, the 'future needs' identified will lead back to simply building to meet predicted demand, rather than active demand management. Being beholden to 'future needs' has to be tempered with an active push towards adjusting traffic levels to meet sustainable development goals.

While it is appreciated that 'this report is intended to advise government on needs of the SRN... to inform decisions on outcomes, priorities and funding' there are still some gaps, for instance, there is no information on how this strategy ties into the National Planning Policy Framework (NPPF) or new National Networks National Policy Statement (NNPS).

Additionally, there is no mention of the Section 62 duty of the Environment Act (1995) or the Section 84 duty of the CROW act (2000), requiring NH to have due regard to the statutory Purposes and Duty of National Parks and Areas of Outstanding Natural Beauty (AONB). Acknowledgement of these would send a clear message supporting NHs desire towards a much more collaborative approach with stakeholders.

Landscape and Environment

In general, the protected landscapes' view aligns with other environmental stakeholders on page 63 in that demand management, and a drive to improve viable alternative provision, is paramount, especially over building new or expanding existing roads. Page 82 contains a good note on the hierarchy of mitigation, with avoidance being the first point, but all schemes will need to incorporate BNG from the outset to 'halt and reverse the historic decline in biodiversity'.

There is a chance for an ambitious program that integrates environmental and NMU needs into every scheme from the outset, not just 'nice-to-have' additions to a road-based scheme. Assets can be integrated with blue and green infrastructure from the off (SUDS, Green Bridges, Carbon sequestrant planting) to mitigate historic loss of biodiversity and improve BNG capabilities.

The recognition of the scale and potential of NHs roadside verges and other soft estates is welcomed, as is the statement that 'We will manage our land as an environmental asset, building it into our project and management decision-making', as these provide a large opportunity for nature recovery and for linear corridors. Page 86 states that NH will look at 'better understanding the true value of our land' for which a Natural Capital approach should be employed, which can be much easier applied to any CBR exercises to give a true reflection of the costs involved. There does, however, need to be improvements to combat severance, whether that is incorporating green elements in all bridges, installing new green-bridges, using living cladding (see Millbrook roundabout in Southampton), etc. Underpasses for mammals can help reduce severance effects and roadkill issues.

As soft estate management should be sustainable and encourage bio-diversity, the intention to use soft estates for BNG nature-based solutions is welcome. There is an opportunity to employ diversity boosting cut-and-collect methods, such as those used by Dorset CC, and make use of arisings in bio-digesters to refine bio-fuels and establish a circular economy. There have, however, been concerns about NHs previous track record concerning maintenance of verges and other soft estate. There are examples of poor management by NH, or poor communication about management responsibilities, having led to BNG projects being stymied by either overgrowth of individual species (A3 Hindhead tunnel and overgrowth of gorse) or outright failure (A14 Cambridge, ~1/3 planting failure). It should also be noted that

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it is not just trees that can sequester carbon, alternative species mix can be used for carbon capture and investigations can be done into native species suitable for this.

In the assessment of lighting provision, please be aware of the importance of dark night skies in rural areas, protected landscapes and the location of dark sky reserves and parks. If lighting can be removed from these areas, there are benefits to the nature recovery, decreasing CO₂ emissions and people's sense of tranquillity experienced in protected landscapes. Where new or replacement lighting is considered, we would encourage NH to install warm-white LED (less than 3000k) lighting, which is better for nocturnal wildlife and more appropriate for rural communities.

Drainage

Renewals of drainage systems are appreciated as this gives opportunities to increase sustainability and resilience by incorporating SUDS features into drainage solutions.

NMU

The emphasis on NMUs, along with pledges towards improving active travel and public transport take-up is appreciated, however it does need to be pointed out that 'Customers' are not just 'car users'; public transport and NMU needs must be integrated from the start, not just be 'nice to haves'. While an investment in increased numbers of safer bus stops and shelters is welcomed, options for buses can also include more dedicated space for buses, Bus Rapid Transit corridors or guided busways.

NMUs need to be prioritised and given the focus and investment required, this includes things like ensuring infrastructure is built to LTN 1/20 standards, with the increased safety and width prescriptions, over relying on DMRB figures. Safety needs to cover both actual, measurable accident reduction and the perception of safety, separation is required via initiatives such as earthworks, planting or both, to provide that psychological barrier, as much as a physical one. With the rise of e-bikes, greater distances and terrains are able to be navigated, therefore longer commutes are possible alongside leisure riding. Better dedicated, LTN 1/20 compliant routes are necessary to allow for active travel connectivity. The NMU route alongside the A27 between Firle and Polegate is a good example of providing a route, though the amount of felling prescribed for the work area was arguably excessive and schemes like this need to better consider these impacts.

Electric Vehicles

Charging infrastructure needs to be installed in a sustainable way, with upgrading and retrofitting existing facilities being a priority before constructing new facilities, especially around protected landscapes. Need for charging should not be a reason to run roughshod over Section 62/85 duties. NH also need to be aware that EV is potentially not the solution for heavy vehicles such as HGVs and plant, may need to incorporate additional fuels such as green hydrogen into plans.

Simply switching to Electric Vehicle (EV) fleets is not a total solution, reduction in traffic numbers is required as simply electrifying the fleets will not solve issues of congestion and pollution from tyre and brake particulates.

Approach

The overall corridor perspective to RIS3 determinations is welcome, as it allows a holistic approach to improvements not just tied to on-highway solutions. Some examples of the

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interactions between corridors would be appreciated, e.g. how does the South Coast Central route tie into the London Orbital route (A3, A21 etc). There is a concern around being siloed by route and not integrating with cross boundary schemes, especially a risk when looking to improve long distance multi modal trips.

We agree that maintenance and renewal should be priorities above new road building and alternative modes need to be supported i.e. public and active travel. The build strategies are helpful, and 'Build Nothing' should remain at the forefront of decision making, presuming to find other solutions to situations besides building more road/capacity. All other strategies need to incorporate environmental components (BNG, Blue/Green infrastructure) from the outset, as this greatly contributes to 'building clever' and 'building efficiently'. All schemes need to consider a multi-modal approach and how to encourage mode shift.

Safe speeds are essential, especially where the SRN interacts with more populated and built-up areas, and we appreciate that this is one of the considering factors. Speeds should be selected appropriately and if measures are required to adjust the road feel to accommodate this, they should be factored into the design needs. Meeting the desired speeds through road design is preferable to relying on additional enforcement measures i.e. speed cameras, especially in rural areas. Given that there are significantly lower emissions at 50mph compared to 70mph, the environmental benefits of lowered speed limits must be considered alongside the safety and resident community impacts.

NH cannot exist in a silo, there needs to be constant work with partner organisations to produce a joined up, holistic strategy to encourage mode shift away from single occupancy private vehicles, and a commitment to long term behaviour change programs. On that note, there needs to be a greater synergy between transport and spatial planning. It is counterproductive to simply state on page 74, concerns with 'new garden communities, where reliance on the SRN is high' when NH could be deeply involved in the development of such locations, advocating and investing in viable alternatives, whether that is more integrated mix, placing jobs within the community, improved public transport options or improved ability to work at home and reducing the need to travel. We appreciate this is touched upon on page 76, but these pledges need to be actioned. Demand Management is key and NH cannot afford to declare that anything outside the immediate SRN is simply none of their business.

It is important that investments in all areas should be accompanied by environmental enhancements from the outset. Green/Blue infrastructure needs to be a core pillar of scheme design, not just squeezed in at the end if there's space/money/time. This would provide a better approach to environmental investment rather than just delaying it to designated funds schemes that may or may not happen depending on the cost. Designated funds should not be seen as the solution/alternative to BNG and environmental issues with main schemes.

Construction

The agreement towards sustainable construction measures, such as using warm mix asphalt, rather than hot mix as an option is appreciated. However this should be more ambitious, for example recommending warm mix as standard across the whole network as a large, and easy, carbon and energy saving technique. The outcomes of developments such as the Oxfordshire road repair trials should also be incorporated.

While modular and standard approaches are efficient, there needs to be some acknowledgment of specific context, especially in regard the landscapes in and around

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Protected Landscapes. These areas are looking for much more integrated solutions, often bespoke, as opposed to standardised 'anywhere' construction.

Legacy and Next Steps

Page 32 notes that 'there is still a significant number of schemes, committed in RIS1 and RIS2... that we will continue to consider in our decision making for RIS3', which is a concern. All holdover and pipeline schemes (especially remaining RIS1 schemes) should be re-evaluated against the new vision, changed legislation, targets and cost/benefits including Natural Capital costs. A re-iteration of not building more roads on this page is appreciated, however, there is a risk that road building schemes are implemented because of sunk costs and their ongoing presence in the program. If the issues that these schemes seek to solve are still a concern, they should be re-developed in line with the changed policies and commitments.

A selection of core KPIs with specific, measurable, targets are welcome though there are some queries as to what the actions for failing to meet these KPIs would actually be. However, the statement that these metrics will continue to be monitored and addressed throughout the RIS3 period and beyond is welcome.

The pledges towards additional and enhanced training are good, though with environmental concerns put to the forefront of scheme development, there should be training for all staff in environmental needs, NMU provision and, landscape-led development, to eliminate a mindset of environmental and NMU improvements being 'nice-to-haves' bolted on to the end of schemes. Training should also be used to improve stakeholder collaboration, where there has often been a sense of dismissal when views from topic experts have been sought, especially in the realms of landscape & environment and NMU provision. For example, the quoted case study on page 126 of the Lower Thames Crossing is not a glowing example of joined up working as multiple comments on the consultation, including from STB TfSE, noted a lack of consideration for local authorities, local networks and integration.

There is a lot to commend in the vision going forward for RIS3 and beyond. We, along with other stakeholders, will be looking to NH keep to these pledges it has made. Past experiences have given a perception that NH do not always give environmental and landscape concerns raised by topic experts due weight and priority. Additionally, it often feels like NMUs are treated as a tertiary demographic, provision for which undermines the 'true' purpose of NH. This does level doubt at these pledges being adhered to in an appreciable way at a time when these key principles (collaborative working outside of the SRN silo, BNG and environmental maintenance and, viable mode-shifting alternatives) are so essential.

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