

To:

**National Highways**



By email:

[routestrategies@highwaysengland.co.uk](mailto:routestrategies@highwaysengland.co.uk)

South Downs Network  
CPRE office  
Browning Farm  
Uckfield  
East Sussex  
TN22 5HG

E: [vic.ient.SDN@gmail.com](mailto:vic.ient.SDN@gmail.com)

W: <https://southdownsnetwork.org.uk/>

Dear National Highways,

Date: 30<sup>th</sup> Dec 2021

**Re: National Highways Route Strategies**

With reference to your future Road Investment Strategy (RIS3) please consider our comments on the following pages.

**[About the South Downs Network \(SDN\)](#)**

The SDN was formed to campaign for the formation of the South Downs National Park and the protection of the environment. The SDN is made up of over 40 independent groups and charities across the South Downs National Park including organisations such as CPRE and the Wildlife Trusts in Hampshire & Sussex.

We share information and campaign for the best possible environment to protect the beauty and landscape of the National Park and its environs in East Sussex, West Sussex and Hampshire with the aim of a sustainable future and meeting the carbon challenge.

Thank you for the opportunity to share these concerns in this round of public consultations

Acknowledgements: Research by Harry Robson, MLitt., BA Hons.,

Yours faithfully

Victor S Ient, MSc.,

Volunteer Organiser  
South Downs Network

T: 07788720929

E: [vic.ient.SDN@gmail.com](mailto:vic.ient.SDN@gmail.com)

## Re: National Highways Route Strategies

[Please see references in Appendix A]

We write with reference to:

1. National Highways web consultation publication: [Our Route Strategies 'Planning for the future of our roads'](#)
2. DfT publication: [Planning ahead for the Strategic Road Network Developing the third Road Investment Strategy](#) Published 1 December 2021

If RIS3 is to play its part in decarbonising transport, growing the economy and building a technologically advanced network, the following should be taken into consideration for the sake of generations to come:

## Principles:

### Carbon emissions

- The UK Government must honour its commitment to achieve net zero by 2050
- Surface transport is the largest emitting sector in the UK, accounting for 27% of carbon emissions
- RIS1 and RIS2 failed to make a meaningful impact on carbon emissions and encourages private car use
- RIS2 contributed to 33 million tonnes of extra carbon emissions
- Air pollution is contributing to a growing public health crisis, which will cost lives and further burden the NHS
- **RIS3 cannot repeat the mistakes of RIS1 and RIS2 on carbon emissions** *See Appendix A item J*
- **A multimodal network which prioritises rail, bus and active travel is the most effective way to reduce carbon emissions, by making significant reductions in private car usage** *See Appendix A item B, F and J*

### Induced traffic

- Increased road capacity not only fails to address the issue of congestion, in the long term it contributes to an increase in traffic *See Appendix A item C*
- When new roads are built, new traffic is diverted onto them *See Appendix A item C*
- Previous traffic forecasts on infrastructure projects have been underestimated
- **It is essential that National Highways reviews how traffic forecasts are calculated in future projects**
- **Evaluations must be clearer on the proportion of traffic flow caused by traffic generation versus traffic re-assignment from other routes**
- **The road network must be better, not bigger**

## Nature and biodiversity

- The UK's natural landscape is unique, inimitable and irreplaceable
- Habitat destruction should be avoided altogether until all viable alternatives are exhausted
- The 10% net biodiversity gain required by law in all future projects is a minimum requirement, not a target [See Appendix A item E](#)
- **Our National Parks protect natural beauty, wildlife, cultural heritage, and recreation – future infrastructure projects must not encroach on them** [See Appendix A item D](#)
- **Improvement of existing networks and investment in public transport is a greater safeguard for our nation's biodiversity – habitat creation and compensation are far more costly in the long run than habitat protection** [See Appendix A item E](#)

## Future of transport

- The Transport Secretary has expressed his desire for a future in which 'public transport and active travel will be the natural first choice for our daily activities' [See Appendix A item H](#)
- Trends in travel habits show that young people are less interested in private car ownership than their parents
- **To best serve future generations, infrastructure projects must evolve beyond the 20<sup>th</sup> century, and prepare for a new generation of digitally-literate, environmentally conscious travellers**

## Economy

- Sustainable economic recovery from the pandemic should be a priority in future infrastructure projects [See Appendix A item I](#)
- To achieve this, infrastructure projects must link businesses and residential areas with affordable and accessible public transport networks [See Appendix A item B,F, H](#)
- **RIS1 and RIS2 projects irresponsibly underestimated the costs of construction and biodiversity compensation, unnecessarily burdening the UK taxpayer - as we emerge from a period of severe economic downturn, National Highways must display more budget responsibility and favour road improvement over road construction** [See Appendix A item B](#)
- **Biodiversity and natural resources should be considered as economic factors in future evaluations** [See Appendix A item I](#)

We also ask you to accept:

## Biodiversity Net Gain

That major infrastructure from should not be excluded from Biodiversity Net Gain as it undermines the Government's wider environmental agenda. This harmful impact will not only be measured in

environmental terms – there will also be long-term consequences for our economy. As Professor Dasgupta’s recent report on the economics of biodiversity makes clear, nature and the services it provides (from providing water to boosting public health) are economic assets, just as infrastructure projects are assets. As Professor Dasgupta warns, continuing to damage natural assets to secure short-term profits ‘presents extreme risks and uncertainty for our economies’. [See Appendix A item E](#)

## **Accelerate the transition from private, car-centred transport to a multimodal strategy**

That as the UK emerges from the pandemic, it is imperative that the health, wealth and happiness of its citizens are at the heart of all future development. A transportation network which ensures all three will be the cornerstone of our economic recovery and a bulwark against the climate crisis. However, we cannot fix 21<sup>st</sup> century problems with 20<sup>th</sup> century solutions. We must accelerate the transition from private, car-centred transport to a multimodal public network of rail, bus and active travel. [See Appendix A item B,C, G](#)

## **National Parks**

National Highways should avoid the construction of Major roads in or near National Parks and their 'Setting' [See Appendix A item D](#)

## **Achieving Net Zero Carbon Emissions**

National Highways should provide evidence in RIS3 how they propose to achieve the Government’s commitment to Net Zero Carbon emissions by 2050 [See Appendix A item A, B, G, H, I](#)

## **Integrated Transport Solutions**

National Highways should demonstrate in detail how in RIS3 how they intend to integrate their road plans with bus, rail and active travel plans [See Appendix A item B, F, G](#)

See Appendix A for references on the following pages:

## Appendix A References:

### A) Carbon emissions

UK Government: [UK becomes first major economy to pass net zero emissions law](#). New target will require the UK to bring all greenhouse gas emissions to net zero by 2050.

Transport Action Networks research: [ROADS & CARBON – 'Building new roads increases traffic, leading to more carbon emissions'](#).

DfT – Overall Emission Reduction of 62%: [Greening Government Commitment](#)

New Civil Engineer: [DfT set to target procurement to deliver on sustainability aspirations](#)

### B) National Highways Plan

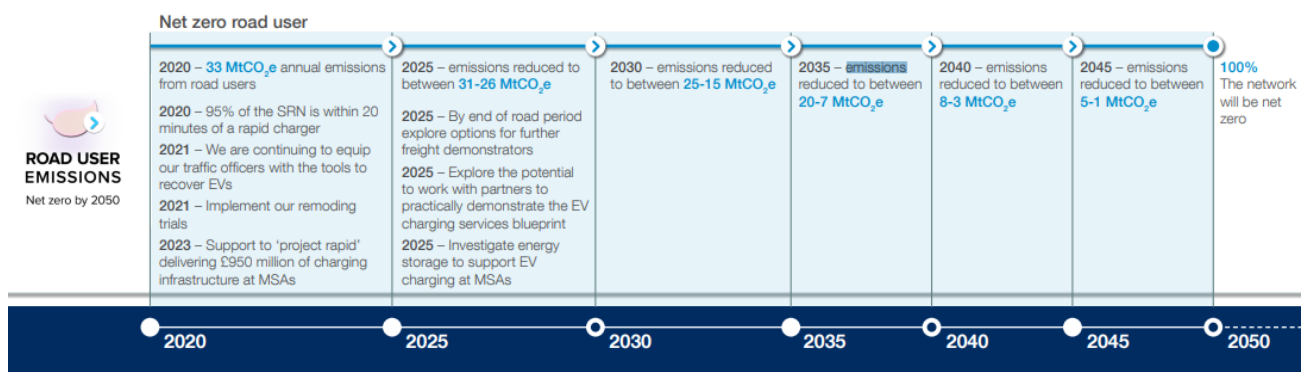
National Highways: Net zero highways: our 2030 / 2040 / 2050 plan: [National Highways commits to achieving net zero greenhouse gas emissions for our strategic road network](#)

The document says "We will publish our proposed approach to zero carbon HGV trials by the end of 2022" and "We will publish a blueprint for EV charging services on our roads by 2023"

The plan also says:

- Report in 2023 how we can help reduce empty lorry movements
- Present a report to the Secretary of State for Transport on global HGV technology trials and our proposals for UK trials in 2022
- Publish a blueprint for EV charging services and energy storage by 2023
- Have a preferred investment plan for HGV charging by 2028, for RP4 implementation
- Publish a plan to improve public transport on the SRN in 2023 and implement through RP3

On page 8 this table is published:



It seems to rely on the provision of EV chargers and the phrase 'emissions reduced'

On page 2 it says "Reducing emissions to net zero is a journey. Over time new solutions will become available and the path will become clearer. This plan provides a snapshot of what we intend now. We will use a process of continual improvement to refine our course into the future."

On Page 5 it says "The largest source of emissions comes from the vehicles driving on our network. Government has set its trajectory for net zero road transport by 2050. This is a rapid transition with up to a 55% reduction in emissions by 2030 and up to a 90% reduction in emissions by 2040. Our plan will enable this transition by providing the infrastructure needed for zero carbon motoring on the Strategic Road Network".

On page 12 it says "We will take the following actions: Set out how we will manage our green space for carbon removal, renewable generation, safety and biodiversity in an Environmental Sustainability Strategy we publish every road period and in our five year Delivery Plans"

The plan does not commit to Net Biodiversity Gain.

On page 25 there is a section on:

#### MODAL SHIFT AND OTHER ACTIONS

It says:

We also support other actions recommended by Committee on Climate Change on modal shift and managing the demand as these will help reduce the growth in traffic on our network.

We will take the following actions:

- Integrate net zero into our statutory consultee responses to planning applications from 2022
- Work with the sub-national transport bodies to agree priorities and actions to support delivery of our net zero strategies by 2022
- Develop and implement a programme to improve public transport operations on the SRN, promotion of walking and cycling, and measures
- to reduce the need to travel Implement a comprehensive plan to reduce, remode and retime journeys in the third road period
- Work with HS2 to provide good access to their new stations, such as our £280m investment to increase capacity on the M42 near Solihull. Work with Network Rail to increase freight and passengers on rail as part of the updates of our 18 Route Strategies
- Deliver our RP2 commitment to make the SRN more accessible for walkers, cyclists and horseriders. For example, the A30 scheme near Honiton and upgrading the Whitemare Pool cycleway on the A19

Modal shift will help cut emissions from our network in the short and medium term. By 2050, however, the transition to zero carbon vehicles will mean that the carbon impact of modal shift will be small. We also fully recognise that modal shift brings a wider range of benefits.

### **C) Induced Traffic**

Campaign for better Transport – [Induced Traffic](#)

DfT: [TRUNK ROADS AND THE GENERATION OF TRAFFIC](#)

John Elliott, Independent Transport Consultant [Silvertown Tunnel](#)

### **D) National Parks and their 'Setting'**

Para 5.152 of the National Policy Statement for National Networks published in 2014, it states that "there is a strong presumption against any significant road widening or the building of new roads and strategic rail freight interchanges in a National Park, the Broads and Areas of Outstanding Natural Beauty, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly. Planning of the Strategic Road Network should encourage routes that avoid National Parks, the Broads and Areas of Outstanding Natural Beauty."

In addition, paragraphs 5.150 and 5.151 of the National Policy Statement reiterate the more general presumption against major development in National Parks,

Para 176 of the National Planning Policy Framework (NPPF) has also recently been updated to include protection for the setting of National Parks. In relation to the setting of National Parks and infrastructure it says: "should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas".

## **E) Nature and Biodiversity**

Environment Secretary : In June 2021 [The Guardian](#) quoted the Environment Secretary, George Eustice when he said: "If we want to realise the aspiration set out in Prof Dasgupta's landmark review to rebalance humanity's relationship with nature, then we need policies that will both protect and enhance the supply of our natural assets. "This is what lies at the heart of the government's 25-year environment plan, and our new measures to embed biodiversity net gain further in the planning system for major infrastructure, through our landmark environment bill".

Ramboll – Biodiversity Net Gain – [How greening developments can benefit us all](#)

## **F) Multimodal transport**

International Growth Centre – [Key considerations for integrated multimodal transport planning](#)

Campaign for Better Transport: [Covid-19 Recovery Renewing the transport system July 2020](#)

Green Transport Solutions: The importance of [Accelerating modal shift to public and active transport](#) to combated climate change.

The C40 Knowledge Hub: [How to drive a modal shift from private vehicles to public transport, walking and cycling](#)

## **G) Bus & Rail Travel**

UK Government: [Great British Railways: Williams-Shapps plan for rail](#)

UK Government: [Bus back better - A long-term strategy for buses in England, outside London.](#)

## **H) Government Policy on Climate Change**

UK Government: [Net Zero Strategy: Build Back Greener October 2021](#)

Under section 8 on page 156 it says "We cannot simply rely on the electrification of road transport, or believe that zero emission cars and lorries will solve all our problems. As we build back better from the pandemic, it will be essential to avoid a car-led recovery. Alongside road vehicle decarbonisation, we must increase the share of trips taken by public transport, cycling and walking. We want to make these modes the natural first choice for all who can take them. As more journeys are cycled or walked, and taken by public transport, the carbon, air quality, noise and congestion benefits will be complemented by significant improvements in public health and wellbeing.

It goes on to say: " We will support and encourage modal shift of freight from road to more sustainable alternatives, such as rail, cargo bikes and inland waterways. We will transform last mile deliveries, with zero emission HGVs and decarbonised deliveries made possible through the adoption of new delivery models, supported by accurate data and digital innovations which drive greater efficiencies

16. Cycling and walking can help us tackle some of the most challenging issues we face as a society, not just climate change, but improving air quality, health and wellbeing, addressing

inequalities, and tackling congestion and noise pollution on our roads. Increased levels of active travel can improve everyday life for us all.

24. We will build extra capacity on our rail network to meet growing passenger and freight demand and support significant shifts from road and air to rail.

45. We will support and encourage modal shift of freight from road to more sustainable alternatives, such as rail, cargo bike and inland waterways. This will be supported by a package of policies including:

- Investing in the capacity and capability of the rail network for freight, including infill
- electrification schemes;
- The Mode Shift Revenue Support and Waterborne Freight Grant Schemes;
- Introducing a rail freight growth target; and
- "Last mile" measures to support more sustainable freight in urban areas

52. We will take action to increase average road vehicle occupancy by 2030. Increasing car occupancy from 1.55 to 1.7 could save nearly 3 Mt of carbon a year by 2030. We are building our evidence base to understand the barriers and potential policies to increase the uptake of shared mobility.

DfT – Transport decarbonisation plan: [Decarbonising transport: a better, greener Britain](#)

UK Government – 25 Year Environment Plan '[A Green Future: Our 25 Year Plan to Improve the Environment](#)'

Page 12 Chapter 1: Using and managing land sustainably item 1: Embedding an 'environmental net gain' principle for development, including housing and infrastructure

Page 32 item 1. Embedding an 'environmental net gain' principle for development including housing and infrastructure

## **I) Economy**

HM Treasury – The Economics of Biodiversity: [The Dasgupta Review](#)

## **J) Other references**

DfT Operational Sustainability Strategy 2021 – 2025: [Operational Sustainability Strategy 2021 – 2025](#)

[DfT's Road Investment Strategy 2: 2020–2025 dated 11th March 2020](#) says:

"Progress has been made against the Biodiversity Action Plan On page 30 it says, "Biodiversity No net loss of biodiversity from Highways England's activities, both from new schemes and its operational estate." On page 61 it says "In RIS2, the biodiversity KPI will go further by requiring Highways England to deliver No Net Loss of biodiversity across its soft estate over the course of the road period, using Natural England's assessment approach. This would measure both the contribution of the enhancement schemes under construction in RP2 and the status of Highways England's soft estate".

National Infrastructure Commission: Design Principles National Infrastructure (March 2020): '[climate people places value](#)'