SHAPING THE FUTURE OF ENGLAND'S STRATEGIC ROADS

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Summary

- The logistics industry needs a reliable, resilient Strategic Road Network (SRN) in order to operate effectively and support economic growth.
- Projects delayed from the RIS2 period remain much needed and must be delivered swiftly.
- In the absence of any new major road-building schemes, RIS3 will be assessed on whether it leaves the SRN in a better condition at the end of the five-year period.
- Logistics UK welcomes the focus on freight in the *Initial Report*, as well as specific proposals to increase the quantity and quality of HGV parking facilities.
- RIS3 must future-proof the SRN as the logistics industry continues its decarbonisation journey and explores autonomous technologies.

About Logistics UK

Logistics UK is one of the country's largest business groups, supporting, shaping and standing up for safe and efficient logistics. We are the only organisation representing the entire logistics sector.

We represent a sector delivering an increasingly innovative, productive and sustainable system of essential national infrastructure. This system ensures the availability of the products that households, businesses and public services rely on every day, and is supporting the UK's transformation for the future. Our membership of over 20,000 includes global, national and regional businesses and SMEs spanning the road, rail, sea and air industries as well as the buyers of freight services, such as retailers and manufacturers.

Response to consultation

Introduction

For an efficient logistics industry, free flowing roads with minimal delays are crucial. Road freight is an essential enabler of all business activity: in 2020, road accounted for 89% of all freight traffic, playing a crucial part in the UK's supply chain[1]. It also plays a key role in facilitating and supporting other freight modes. Transport infrastructure spending continues to be needed to improve roads across the UK, nationally and locally, to enhance capacity and reduce unreliability. Appropriate policies and funding are also needed to help provide facilities for drivers to attract sufficient resource to the industry.

Logistics UK was broadly supportive of RIS2 and felt it went a long way towards addressing infrastructure needs; providing that the Government ensured sufficient long-term funding was in place to deliver improvements both during and beyond the RIS2 period. We are therefore concerned that many of these schemes have not progressed as planned.

We have been actively engaged with the development process for RIS3 and will continue to highlight the need for investment strategies to support the growth and efficiency of the logistics sector.

Strategic objectives

Logistics is the backbone of the UK economy; enabling the movement of vital goods and services that keep industry, retail and vital public services operating every single day. Economic growth is both enabled and welcomed by our

[1] GOV.UK Statistical data set: Freight (https://www.gov.uk/government/statistical-data-sets/tsgb04-freight)

industry, and the infrastructure upon which it relies is critical to that growth. Strategic transport routes must therefore not be seen purely in relation to movement of people, but also in terms of their importance to the flow of goods and services.

Logistics UK welcomes the emphasis in RIS 3 on growing the economy, but we also urge a much longer-term view on creating an effective national freight network. The challenges our economy faces, such as the need to 'level up' and spread prosperity more widely across the country, will not be fully solved in the RIS 3 period. A clear vision of the future infrastructure needs for the economy should be the foundation upon which these shorter-term plans are built.

The UK logistics industry has an exceptional safety record, yet we accept that road haulage does inevitably bring an element of risk to those working in it. Ensuring the safety of both logistics workers and other road users should rightfully be placed at the centre of everything National Highways does. We comment further on specific proposals below, but endorse the emphasis placed on this objective.

The resilience and reliability of our Strategic Road Network is crucial to the success of the logistics industry and is one of our members' biggest frustrations. Poor road condition, overrunning works and capacity constraints all combine to make journey planning highly unpredictable. This brings with it huge business costs such as missed deliveries, unnecessary overtime, increased fuel consumption and inefficient fleet utilisation. Road congestion is a particular challenge as it creates both economic and environmental problems costing the UK economy £9.5 billion in 2022 alone[2]. Having an HGV stuck in congestion costs £1.29 per minute to the operator, thus all congestion adds friction cost into the UK economy. Congestion also has a direct impact on fuel consumption and emissions; with vehicles continuing to use fuel when left idling and stationary.

In acknowledging the need to manage a network that is fit for purpose, National Highways must commit to ensuring that network performance is stronger at the end of the RIS3 period than it is at the start.

Our industry is at the forefront of technology, be it in warehouse operations, supply chain management or zero-emission vehicles. To make the most of this investment and innovation, strategic infrastructure must keep up. The RIS3 commitment to build a 'technology-enabled network' is positive and must extend beyond National Highways' own operations into creating a road network that is fit for the future. This should involve continuous improvement of road information systems (including Smart Motorways), intelligent traffic management and preparation of the network to support low and zero emission vehicles in the near future.

Logistics UK has expressed our disappointment at both the delays to major schemes that were expected to be delivered under RIS2, as well as the announcement that RIS3 will not commit to any new road building projects. While we welcome the commitment to continue with projects such as the Lower Thames Crossing, the stop-start nature of such investment not only undermines the industry's confidence in infrastructure delivery, but also brings huge costs in terms of material and labour availability, planning delays and lost economic opportunities. In planning the network for the future, National Highways must not let the RIS3 period go to waste, but instead must develop a comprehensive, long-term plan for future capacity requirements, in conjunction with the logistics industry.

The need to achieve net-zero and improve environmental outcomes is perhaps the biggest challenge logistics faces and is one that the industry is facing up to. Logistics UK therefore welcomes the objective to improve environmental outcomes in RIS3 and calls on National Highways to play a greater role in facilitating the decarbonisation of road transport. This includes supporting the provision of far more electric charge points, working with other infrastructure bodies to ensure that our energy provision aligns effectively with the transport network and recognising the impact a free-flowing SRN can have on making the business case for investment in zero-emission vehicles.

Trunking and de-trunking

Logistics UK recognises that the relationship between the SRN and local roads is complex and multi-faceted. Our members operate in terms of routes, either between sites, to and from suppliers or to market. They do not distinguish between the SRN and other roads they may operate on.

Therefore, while we do not make any specific comments on the (de-)trunking of any roads in this response, we do call upon National Highways to take decisions that guarantee the best possible performance of the routes used by our vital logistics businesses. Any decisions must ensure that:

- Where roads are transferred to National Highways, their integration with the local network continues to be supported and enhanced through an ongoing dialogue and co-investment with local stakeholders and businesses.
- Where de-trunking takes place, that there is no significant downgrading of the importance of these assets and that their performance does not deteriorate due to a lack of resources and/or competing priorities.

[2] INRIX 2022 Global Traffic Scorecard (https://inrix.com/scorecard/)

Working towards National Highways' long-term vision

Logistics UK enjoys a positive and collaborative relationship with National Highways and has been engaged in both the development of the *Initial Report* and more broadly in shaping the long-term vision. We recognise the financial climate in which RIS3 is being prepared and the political imperatives being applied that will constrain spending. In addition, with the delays to major schemes seen during RIS2 and the need to carry some of those schemes into the RIS3 period, it would not be advisable to add any major new road building projects to the short-term pipeline.

However, as the report rightly identifies, freight movements on the SRN have been growing and will continue to do so for the foreseeable future, with road remaining the predominant mode for freight. There are already significant capacity constraints in parts of the network and this increase will only lead to further pressure on overstretched corridors and junctions. While acknowledging the wider economic and political context, RIS3 cannot be allowed to exist in isolation. In addition to delivering the projects and maintenance schemes identified, National Highways must use the next five-year period to set out a much longer-term set of investment priorities to ensure that industry is not unduly harmed by capacity and reliability issues even when funding is available to address them. This planning must be carried out in harmony with other infrastructure operators such as Network Rail and National Grid, as well as the logistics sector, to support the development of an effective National Freight Network as set out in the Government's *Future of Freight* strategy.

The modelling used to forecast future road usage is in line with the predictions of the logistics industry. We urge National Highways to continue to use a broad range of indicators to understand current and future demand, as well as continually seeking the expert views of logistics operators and customers. It is also worth remembering the role of National Highways itself in shaping the nature of future road usage. Infrastructure operators cannot simply wait for a certain level of industry demand to support alternative fuelling options for example. Businesses need confidence to invest, and in relation to zero-emission vehicles a lack of infrastructure is a frequently cited reason as to why businesses have not yet made the transition. We urge National Highways to be bold and innovative in providing, facilitating and incentivising energy, fuelling and digital infrastructure, which will encourage the logistics industry to follow suit.

The vision set out in the *Initial Report* of a network which provides "unimpeded access to domestic and world markets, driving national and international competitiveness" is one that Logistics UK fully endorses. We know that currently freight does not move as freely across the network as we would like, nor do we have the multimodal integration that the future economy will require. We believe this vision is achievable, but it will require a committed, long-term approach across the whole of Government, working in close collaboration with the logistics industry.

Improving safety for all

As set out above, Logistics UK is a fierce champion of safety within the industry. Road hauliers have a critical duty to protect both their own workers and other road users and the industry can be proud of the progress it has made in this area. However, we also know there is much more to do, and that HGVs continue to be involved in a significant number of incidents across the SRN.

We therefore endorse National Highways' approach in making the provision of safe roads a top priority. Not only will improvements in this space help to reduce incidents, injuries and fatalities, but also fewer, less serious incidents will play a major role in helping to keep the network moving. With constraints on resources, it is right that an emphasis is placed on the parts of the network with the lowest safety standards, but there must not be a loss of focus on the most critical routes on the SRN in terms of traffic and freight movements.

A busy SRN is a complex interaction between drivers of varying skill levels, experience and other complicating factors. Safe and predictable driver behaviour is crucial to preventing incidents, with continuous education and effective enforcement required to ensure this. Logistics UK therefore calls on National Highways, in conjunction with the Police and other responsible agencies, to significantly increase its educational and awareness raising activity to ensure drivers stick to the rules of the road, respond correctly in the event of an incident and respect other road users. As an industry representative, we commit to disseminating relevant information as well as continuing to champion best practice.

Similarly, Logistics UK constantly promotes and advises on the importance of correct commercial vehicle maintenance, which can have a significant impact on the likelihood of a breakdown or other incident. We want standards to remain high across the industry and are keen to work with National Highways to understand how they can support these efforts.

Technology plays an ever-increasing role in managing the safety of the SRN. In particular, the provision of rapid, real-time information to drivers allows them to mitigate any risks ahead of them and can reduce the severity and impact of incidents. This can be improved right across the network, and we call on National Highways and the Department for Transport to support investment in better overhead/roadside information and intelligent traffic management. In particular, our members feel there are major variations in the safety standards between different Smart Motorway sections of the SRN and wish to see further improvements, including best in class Stopped Vehicle Detection systems, more frequent lane information and better enforcement of the 'red X'.

Making the most of the network

Alongside safety, ensuring the SRN flows freely ought to be a top priority for National Highways. Acknowledging that there will be no significant capacity additions during the RIS3 period, it is therefore essential that we make the most of the network that we already have. However, both statistical evidence and qualitative feedback demonstrate that the condition of the SRN's assets is one of the biggest frustrations of road users, as well as being a major contributor to delays[3].

The emphasis on better understanding SRN assets as set out in the *Initial Report* is therefore welcome and must be accompanied by an intelligent, proactive maintenance programme that identifies and remedies problems before they pose a threat to the safety or reliability of a route. In doing so, National Highways must strike the right balance between keeping interventions (and therefore disruption) to the minimum level needed to maintain the asset and ensuring that the whole asset lifecycle and broader economic impact are considered. There will be instances where a single, major asset renewal will have a smaller overall impact on freight users in the long term than several smaller interventions over same period. Achieving value for money is important, but any calculations must also consider impacts on the business models of critical freight users of that route.

Alongside the physical road and structure assets, it is essential the technology used to keep the SRN moving is fit for purpose. We must aspire to have a world-leading, highly connected road network and so National Highways must not only replace ageing technology but implement new, resilient systems that help to maximise the overall performance of the network while providing quality real-time information to drivers as outlined previously in this response.

Climate change adaptation is undoubtedly one of the biggest challenges facing the SRN. Extreme weather is already taking its toll on the asset base, with problems only likely to increase in the short term in spite of efforts to reduce carbon emissions. In maintaining SRN assets, logistics has two main priorities for National Highways: firstly, to conduct a proactive maintenance program that improves resilience rather than waiting to repair issues that have already occurred, and secondly to take a whole-network approach that focuses on key corridors that are vulnerable to extreme weather, such as trans-Pennine crossings.

Evolving National Highways' customer and community services

The logistics industry relies on the ability to effectively and efficiently plan freight movements, yet often the unreliability of infrastructure makes this extremely difficult. Logistics UK therefore agrees with the desire set out in the *Initial Report* to improve and expand the real-time information provided by National Highways. We agree that this should be greater in breadth than simply journey times and should cover planned roadworks, incident and event management and the availability of charging points. We also support the ambition to share far more National Highways data with third parties to enable better planning and investment.

The adoption of Connected Autonomous Vehicles (CAV) has the potential to revolutionise the logistics industry. Despite the technology being in its relative infancy, there are a number of promising trials across different use cases currently underway in the UK. If these trials are to expand into widespread use, the SRN will need to be ready to seamlessly integrate CAVs alongside existing road users, particularly along key strategic freight corridors. We urge National Highways to engage extensively with the logistics industry to understand the technological and data needs in relation to CAVs and to invest early to prevent our economy being left behind our competitors.

The trend towards devolution in England has had significant implications for transport decision making. While it is right that these decisions are taken by those with the best knowledge of local business and community needs, it has resulted in a patchwork of responsibilities, including national and local Government, National Highways, STBs and Combined Authorities/Elected Mayors. However, businesses seek opportunities irrespective of political boundaries and simply want an effective freight network, regardless of who delivers it. National Highways must therefore ensure that its activities align with, and complement, those of regional and local bodies, as well as using its knowledge of the freight industry to raise awareness of the needs of logistics when it comes to the interaction between the SRN and local networks.

Logistics UK is extremely pleased to see the importance placed on our industry as a key stakeholder and customer of National Highways. We have consistently called for freight needs to be given greater prominence from the very outset of scheme planning and look forward to seeing this implemented in RIS3. From the beginning of any new road scheme, it is essential that requirements for both logistics sites (such as warehousing and consolidation centres) and lorry parking/driver facilities are included.

We are also pleased that the *Initial Report* recognises that National Highways also has a direct role to play in the provision of lorry parking and driver facilities. It is widely acknowledged that there is a severe shortage of such facilities, which is creating serious issues both for the welfare of current drivers and for attracting new talent to the industry. As well as facilitating the consideration of lorry parking during the planning process, we support National Highways to consider

[3] Transport Focus Strategic Roads Logistics and Coach Survey (https://d3cez36w5wymxj.cloudfront.net/wp-content/uploads/2022/05/25120723/Transport-Focus-Strategic-Roads-Logistics-and-Coach-Survey-FINAL.pdf)

where it may become directly involved in the delivery of facilities, as well as where its existing estate could be utilised and repurposed to address this problem.

Both to support the decarbonisation of logistics and to meet customer needs, our industry must become more multi-modal in its operations. While the road network will continue to support the majority of freight movements, the end-to-end journey of goods may involve one or more other forms of transport. It is therefore essential that National Highways strengthens its joint planning with Network Rail to better support modal shift, as well as engaging with industry to understand their ambitions. Similarly, as logistics continues its journey towards net zero, there will be an increasing need for alignment between the country's transport and energy networks. To give operators confidence to invest in zero-emission fleets, we must ensure that there is a significant expansion of charging points and the associated infrastructure to power them. National Highways will need to work extensively with National Grid and DNOs to achieve this.

Driving decarbonisation and environmental sustainability

The logistics industry is embracing the challenge to achieve net zero and has made significant strides in reducing emissions and investing in new technologies. However, as identified above, to go further in decarbonising long-distance freight movements, the industry needs confidence in both vehicle performance and the infrastructure that will underpin it. Logistics UK members regularly raise concerns about the availability of electric charging points, either due to demand from other road users or them simply not working. We recognise the efforts made to date by National Highways to maximise the benefits of the rapid charging fund, but more needs to be done to support the shift away from internal combustion engines. Where there is a clear market failure to provide charging points in an area of demonstrable need, Logistics UK would support interventions by National Highways to provide the necessary physical infrastructure.

Logistics UK believes that the future of road freight will rely on a variety of powertrains, and it is therefore essential that the SRN is able to facilitate this transition. National Highways must continue its support for zero emission HGV trials and work with industry to ensure that the right lessons are learned before committing to an investment plan for HGV charging and refuelling, which may include a mix of electric vehicle charging, hydrogen and other fuels.

Taking a targeted approach to enhancing the network

As noted previously, Logistics UK recognises that the economic and political climate in which RIS3 is being developed will lead to difficult choices being made about where resources should be directed. In this context, it is therefore understandable that National Highways is choosing to deliver schemes that are delayed from RIS2, rather than propose any new roadbuilding schemes in RIS3. Given the long-identified need and business case for projects such as the Lower Thames Crossing and trans-Pennine improvements, it is essential that these projects are accelerated and delivered as quickly as possible. Failure to do so brings enormous economic costs to freight operators, local communities and the economy as a whole.

As National Highways assesses the pipeline of schemes earmarked in RIS2, it must ensure that it recognises the full range of economic benefits that road improvement projects can bring. With confidence in journey time and reliability improvements, businesses will invest and create jobs. Similarly, a decision not to progress a scheme deters investment and potentially reduces the competitiveness of our logistics industry. The same broad considerations must also be used when assessing the environmental impacts of new schemes. It is right that National Highways seeks to minimise environmental harms and contribution to climate change, but road schemes must also be assessed on their ability to deliver upstream and downstream benefits in terms of more efficient traffic movement.

Logistics UK has previously supported smart motorways as a means of achieving increased utilisation from existing infrastructure, providing there is sufficient published evidence showing that they are safe. We welcome the progress National Highways has made in improving safety, however there is still more to be done. Major investment in a range of safety measures is needed, including full coverage of state-of-the-art SVD systems, increased safety refuges and more frequent driver information systems, with the aim of bringing the entire network up to the highest safety standards. This must also be accompanied by a dramatically expanded education campaign which aims to not only inform drivers how to drive on smart motorways but also what to do in the event of a breakdown or incident. Following the announcement earlier this year that no new smart motorway schemes would be built, there are also significant questions as to if and how the increased capacity they would have provided will now be delivered.

Despite the decision not to commit to any new major road schemes, Logistics UK is nonetheless supportive of the focus in delivering more, smaller, enhancements. As identified in the *Initial Report*, the fringes of the SRN are often highly congested, which creates delays for the so-called 'last mile' of freight journeys, as well as problems for operators who need to cross the SRN for local deliveries. There are also benefits of this approach to key logistics hubs such as ports and airports, which are often sited off the SRN. As previously mentioned, effective coordination with local partners is critical to maximising the benefits of these schemes by ensuring that national and local investments can dovetail to ensure a holistic approach to solving congestion, rather than simply moving the problem around.

There is also a need to ensure National Highways remains vigilant to the economic harms caused by issues on critical parts of the network such as access to South East ports and the short straits. This route is of vital importance to businesses across the country, yet capacity and other problems are leading to Operation Brock being deployed increasingly often. In addition to delivering the Lower Thames Crossing, the RIS3 period must be used to resolve infrastructure issues that contribute to delays in Dover and elsewhere on this crucial route.

While we appreciate the requirement to develop detailed, five-year plans, to avoid the problem of stop-start investment there is a clear need for a long-term strategy to outline future investment in the SRN. The Government's *Future of Freight* strategy committed to developing a National Freight Network, and so we urge National Highways to use the RIS3 period to set out where major schemes will be needed in the future in order to keep the SRN functioning and free-flowing, with freight and logistics at the forefront of that thinking.

National Highways' performance

The logistics industry values the work of National Highways in developing, maintaining and supporting traffic flow on the SRN, as well as the continued emphasis on enabling efficient freight movement. However, a culture of continuous improvement is required to build the freight network our modern economy requires.

It is clear from the work of the National Audit Office and others that ineffective processes led to a number of schemes earmarked for RIS2 being significantly delayed, particularly at the planning stage. This has been a cause of frustration among freight operators, who are being forced to endure delays and disruption for far longer than they had anticipated. Logistics UK welcomes the measures outlined in the *Initial Report* to address these procedural deficiencies and urge National Highways to maintain a relentless focus on delivering projects swiftly in order to maximise their benefits for road users.

Logistics UK appreciates that every road building, enhancement or renewal scheme is a delicate balancing act between delivery and minimising disruption. Roadworks are the inevitable cost of building the network we want, and their impact can be minimised through effective working practices, modern design processes and continual engagement with the logistics industry to communicate and understand the consequences of closures, lane restrictions and diversions. The need for this engagement is even greater given RIS3's emphasis on improving existing assets.

Above all, RIS3 must represent a step forward in the safety, condition and reliability of the SRN. Notwithstanding the financial constraints discussed elsewhere in this response, RIS3 will still represent a substantial investment in England's road network. It must therefore deliver significant benefits to road users, support more efficient freight movements and the economic growth that will bring, and leave the SRN in a much better state at the end of the five-year period than at the beginning.

Route strategies

Logistics UK welcomes the detail provided in the publication of the Route Strategies alongside the *Initial Report*. From a logistics perspective there is a huge degree of commonality across these in terms of major priorities. These are:

- the need to provide reliable, efficient connections between key freight nodes such as ports and airports, as well as supporting intermodal operations.
- Providing a significant increase in both the number and quality of HGV parking and driver welfare facilities along key freight corridors.
- Future-proofing the network to support the transition to net zero.

In addition, we have provided some summary comments on the main logistics priorities for each route below and look forward to engaging with National Highways in more detail as these develop. Please note that some of these have been grouped together where priorities overlap:

Route	**Logistics priorities**
Birmingham to Exeter	This is an important route connecting the West Midlands conurbation to South West ports and manufacturing facilities. The route is particularly vulnerable to disruption during peak holiday periods, so an emphasis on improving journey reliability and speed is essential.
East of England	Supports important local and long-distance freight traffic through access to ports and connections to North-South routes. Requires reliability improvements to enable growth of key gateways.

Felixstowe to Midlands	As above, a critical route for supporting trade flows East-West. Investment in the A14 and improvements in intermodal operability is needed, as are measures to separate strategic and local traffic as much as possible.
Kent corridors to M25	A route of national importance due to connection to the channel ports, which carry international freight to and from the entire UK. Resilience and reliability are crucial, as demonstrated in the need to deliver both the Lower Thames Crossing and improvements either side of it.
London orbital	The routes around and into London are critical not only to support trade flows into the capital, but also to enable freight growth at surrounding airports.
London to Leeds	Enables long-distance North-South freight movements and connectivity to South East ports. Focus is needed on improving access to freight hubs and improving the resilience of the route, as well as traffic flows that cross the route.
London to Scotland East (North and South)	Significant improvements needed in improving journey time reliability between major urban centres and cross-border, as well as greater resilience for non-motorway sections.
London to Scotland West (North and South)	A key route for trade flows from the South to major urban and industrial centres in the North and West Scotland. Focus is needed to improve the resilience of key interchanges and interaction with East-West routes.
London to Wales	Needs to support cross border connectivity and improved England-Wales economic flows, as well as intermodal ambitions.
Midlands and Gloucestershire	Improvements needed to gateways identified in route strategy of A5, A458, A483 and A40 for cross-border trade flows.
North and East Midlands	Area must be recognised for its importance as a key freight hub. Further expansion must be supported through connectivity to the SRN.
Pennines (North and South)	Emphasis needed on dramatically improving trans-Pennine connectivity and reliability across all routes, as well as ensuring effective interchange with urban areas and North-South routes.
Solent to Midlands	Supporting freight connective and multimodal operations of key South Coast ports.
South Midlands	As set out in route strategy, improvements are needed to facilitate East-West connectivity between freight hubs and urban centres.
South West peninsula	Improving journey time reliability and capacity for freight connections to urban and remote areas, as well as management of issues during peak holiday periods.

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