

**DEPARTMENT OF THE ENVIRONMENT,
TRANSPORT AND THE REGIONS**

WHAT ROLE FOR TRUNK ROADS IN ENGLAND?

RESPONSE FROM FRIENDS OF THE EARTH

**WRITTEN BY ROGER HIGMAN
SENIOR CAMPAIGNER
(ATMOSPHERE AND TRANSPORT)**

13 NOVEMBER 1997

Friends of the Earth

Friends of the Earth exists to campaign actively, effectively and imaginatively to protect and improve the conditions for life on earth, now and for the future.

Friends of the Earth Trust undertakes charitable status research, education and public information work programmes on environmental and related economic and social issues.

FOE believes that society must be transformed in order to prevent environmental degradation and alleviate related social misery and economic waste. We must shift the dominant paradigm of excessive consumption and ever more economic growth, which causes this degradation, misery and waste, so that the needs of people and ecological systems are met simultaneously, and not traded off against each other.

Friends of the Earth has campaigned on transport issues for almost twenty five years. Our principal concern has been the growth in road traffic. Road traffic is a major cause of air quality problems in the UK at a local and regional level. Road traffic contributes significantly to emissions of carbon dioxide, the principle cause of global warming. Traffic threatens wildlife directly through roadkill, through the transport of oil and through habitat destruction from road-building and road-based development. The manufacture of road vehicles consumes vast amounts of natural resources. Their use kills thousands of people annually and pollutes river systems. Their disposal causes further pollution - from tyre dumps to landfill.

Although measures can be taken to minimise many of these effects, it is impossible to eliminate them. Most impacts of traffic however can be reduced through reductions in the level of road traffic. Friends of the Earth is therefore campaigning for a 10% reduction in overall road traffic levels in the UK by 2010, as compared to 1990 levels. Friends of the Earth is also campaigning for the wider use of technology to reduce the impacts of traffic, particularly through changes to vehicle design.

Friends of the Earth has long been at the forefront of political campaigning to reduce the impact of trunk road construction on the environment. Friends of the Earth has opposed Government plans for the expansion of the trunk road network because of the direct damage road-building does to the countryside, because of the effect it has on development pressures and, *a priori*, because it facilitates and indeed encourages traffic growth. However Friends of the Earth does not automatically oppose all road-building.

Friends of the Earth therefore welcomes the Department of the Environment, Transport and the Region's review "*What role for trunk roads in England?*"

Introduction

Friends of the Earth welcomes the Government's commitment "to a more strategic and broadly based approach to transport planning"¹ Friends of the Earth applauds the use of the five criteria the Government has identified as fundamental to the review and the objectives inherent in them, although we make some comments below about the balance that should be struck between them.

Friends of the Earth believes the overall objectives of the review, as laid out in Box 1 below, to be appropriate. However Friends of the Earth is concerned that the questions presented in the consultation document do not invite the sort of fundamental review of the trunk road network that we believe is necessary, or indeed that is suggested by the title "What role for trunk roads in England?". In particular we are concerned that the order of the questions invites suggestions for ways in which problems on the trunk road network could be ameliorated before the purpose of the network has been established.

Box 1 - Objectives of the Roads Review²	
1.	to determine the role which trunk roads should play in an integrated transport strategy
2.	to develop a clear and open framework for the appraisal and prioritisation of investment proposals
3.	to establish and forward investment programme for the trunk road network in England

Friends of the Earth stresses the importance of the first objective of the review. We believe it is impossible to fulfil the second and third objectives, or to answer the detailed questions in the consultation document, without firstly saying something about our thoughts on the role of the trunk road network within an integrated transport strategy.

We therefore present our response almost in completely the reverse order to the order in which the consultation document is laid out. We apologise for any inconvenience this may cause. Firstly we consider the role of the trunk road network, and the related question of who should be responsible for which roads. Secondly we draw some conclusions from this about the importance of the network within an integrated transport strategy. Thirdly, in terms of the second objective of the review, we consider issues such as the funding and commercialisation of the network and fourthly the methods needed to appraise options for its improvement. This fourth section includes our thoughts on the criteria proposed by the Government. Finally we consider the issues raised by the third objective of the review including ways of making better use of existing infrastructure and of managing demand for travel by road, as well as the role of new construction.

At each stage, however, when we draw conclusions pertinent to the questions presented in the consultation, we make reference directly to these questions.

The purpose of the trunk roads network

The trunk roads network exists to cater for the national needs of through traffic³. However no definition exists to say what is through traffic and what is not and no information is available to say what proportion of traffic on the trunk road network is travelling on long journeys⁴.

The mis-use of the network

“What role for trunk roads in England?” makes clear that the trunk road network carries “*a third of car traffic, over half of goods traffic and a fifth of bus and coach traffic*”⁵. Yet not all of this can be long distance through traffic. Information on the proportion of traffic taken up by vehicles engaged on journeys of different lengths is not routinely published. However Table 1 below is informative.

Distance (miles)	Percentage of Journeys	Percentage of Distance
1-9.9	81	32
10-49.9	17	38
over 50	2	29

In general, very few journeys are long distance. More than 80% are less than 10 miles long and 98% are under 50 miles long. However, for the very reasons that the longer journeys are longer, they make up a much greater proportion of the total distance travelled.

Friends of the Earth has discussed with the Department of Transport officials responsible for the National Travel Survey the possibility of their preparing a similar table for car driver journeys. However, these staff have other priorities at present and have not been able to do so.

We do know however, from published tables in the National Travel Survey that the proportion of car driver journeys that are of different lengths is broadly similar to that of journeys as a whole⁷. Over the 1992/94 survey period, 80.2% of car driver journeys were under 10 miles long and over 98% were under 50 miles long. If this distribution of journeys is reflected in the distribution of miles travelled, it is likely that less than a third of all car mileage is driven on journeys of over 50 miles in length. Given that very few journeys of any length start and finish on the trunk roads network (and that many longer journeys will involve considerable mileage on local roads), it is therefore difficult to see how a third of all car traffic can be carried on the trunk road network without it carrying many cars engaged on journeys of less than 50 miles length. In other words, it is likely that some of the traffic on the trunk road network is not through traffic at all.

Indeed a wealth of evidence exists that many people use the trunk road network for relatively short journeys. For example, of vehicles using the M25 between junctions 12 and 13, 43% were engaged on journeys of less than 50 miles. Over half the vehicles using the M25 between junctions 13 and 15 were on such journeys⁸. On average only 35% of the traffic on the M6 through the West Midlands conurbation is through traffic. 35% is engaged on longer journeys to or from destinations within the West Midlands and 30% is purely local⁹. Of traffic on the A34 through Newbury, 38% both starts and finishes within the Newbury/Thatcham area¹⁰. As little as 9% of the traffic in Newbury was making long distance trips¹¹.

Friends of the Earth believes that this phenomenon of local traffic using a network intended for through traffic is extremely important. Although not the main cause of congestion on trunk roads, it exacerbates the problem in particular places impeding longer distance flows. This congestion, or the fear of it in the future, is then used as the major justification for investment in the trunk road network, at enormous cost.

Implications of this mis-use

The fear of congestion, especially on trunk roads, is deeply felt within the business community. A CBI discussion document started with the assertion that “*effective transport networks are an essential part of a strong internationally competitive economy*”. It said that “*there is widespread discontent in the business community about the failure of Government transport policy*” to meet businesses’ needs¹².

The solutions it identifies focus strongly on new and improved infrastructure, and mainly roads:

*“For Governments in Germany, France and the Netherlands, good transport links are a critical underpinning to growth and competitiveness. They therefore accept that they have a responsibility for ensuring that those links are identified and in place. The UK Government should do the same”*¹³.

*“Government transport policy needs to recognise that - as in other countries over the last 40 years - economic growth will bring with it more traffic. The emphasis for business must be on improving access, through key corridors, to markets in a way which respects the environment as far as possible”*¹⁴.

Thinking like this was instrumental in leading the previous Government to double the size of the National Roads Programme in 1989. As the 1989 White Paper put it:

*“Road congestion is bad for the economy. It imposes high costs on industry and other road users, by wasting time delaying deliveries and reducing reliability. ... There is no way of making accurate overall estimates, but it is clear that the costs are very high”*¹⁵

*“The Government’s conclusion is that the main way in which to deal with growing and forecast inter-urban road congestion is by widening existing roads and building new roads in a greatly expanded road programme. The scale of the problem is such that it can be relieved only by a step-change in both the size and the composition of the programme.”*¹⁶

Thinking like this has historically skewed transport spending decisions. As recently as 1995/96, spending on trunk roads accounted for nearly 60% of public spending on construction, improvement and structural maintenance of roads¹⁷. This is despite the fact that only 30% of car traffic (and only half of goods traffic) is on trunk roads and despite the fact that the costs of congestion on the trunk road network is probably only a small proportion of the costs of congestion as a whole¹⁸.

There is evidence that this excessive spending on trunk roads is leading to higher rates of traffic growth on trunk roads than on local roads. The Institution of Highways and Transportation has published figures showing that the average growth rate during the 1980s of traffic on motorways was more than twice the average growth rate on other roads¹⁹. Growth on non built-up trunk roads was significantly higher than on non trunk roads. This data was interpreted by SACTRA as evidence “*that the classes of roads with the greatest traffic growth are closely associated with those that have experienced the greatest increase in capacity*”²⁰.

The use of trunk roads for local purposes, by adding to congestion, fuels demands for trunk road investment. This then leads to further growth of traffic on the trunk road network, both through the reassignment of existing trips and their redistribution. Both are problematic.

The greater availability of funds for trunk road investment as compared to investment in local roads encourages local authorities to press for local improvements in the trunk road network as a way of solving their own congestion problems. This tendency is reinforced by the fact that money allocated for trunk road investment might go elsewhere if the authority doesn't lobby for it to be spent locally. Both factors go some way to explaining why many authorities simultaneously call for changes to transport policy while arguing for investment in trunk roads locally²¹. However this tendency undermines the purpose of the trunk roads network and distorts local transport planning.

The redistribution of trips, facilitated by road-based development following trunk road investment, directly contributes to traffic growth. It is worth noting, on this point, that many of the congestion problems noted in Volume Two of “*What role for trunk roads in England?*” seem directly related to development alongside the trunk road²².

Defining the role of the trunk road network

Friends of the Earth believes it is therefore extremely important that, in so far as is possible, trunk roads are used to cater for the needs of long distance through traffic and not for local needs. This can be achieved in two ways.

Firstly, it would be possible to reduce access to the trunk road network at key places, perhaps by closing particular junctions, or by instituting traffic reduction packages to reduce the pressure for local movement on particular sections of trunk road (or by a combination of the two). Secondly it would be possible to remove the distortion caused by the trunk road network by detrunking all roads save those that are clearly of national significance.

We consider below, when considering the role of the trunk road network in the integrated transport policy, how it might be possible to reduce the use of the trunk road network by local traffic. Beforehand, however we consider the case for de-trunking.

Friends of the Earth has not sufficient data at its disposal to recommend which individual trunk roads should or should not be detrunked. However we believe there is enough data available to suggest that a substantial number of trunk roads could be usefully transferred to local or regional ownership.

Firstly there is evidence that many trunk roads do not carry significant volumes of long distance through traffic. For example, as few as 300 vehicles per day pass along the A259 from one side of Hastings to the other²³. Other examples of trunk roads carrying small volumes of traffic include the A49 in Herefordshire, the A68 in Northumberland, the A35 in Dorset and the A16 in Lincolnshire.

Secondly there are trunk roads which, through an accident of geography, run almost in their entirety or for significant lengths within one local authority area. Examples include the A127 in Essex, the A595 in Cumbria, the A30 in Cornwall, the A47 in Norfolk and the A64 in North Yorkshire. There is a case for devolving control of these, as their development only really affects the local area concerned, especially where the road concerned cannot be considered to be on-route between two other places outside the local authority area.

Thirdly, there are cases of trunk roads in urban areas which are little more than city streets. Many are virtually indistinguishable in character from other roads alongside them. Examples include parts of the A1, the A40 and the A205 in London and the M67 in Manchester. These roads' very character raises the question of whether they should be trunk roads or not.

Fourthly, there are trunk roads which run parallel to each other, where one is clearly much more significant than the other. The best example of this would be the A5 through Bedfordshire, Buckinghamshire and Northamptonshire, but other examples include the A167 in County Durham, the A40 in Gloucestershire and the A61 in Derbyshire and South Yorkshire. Again, the existence of these parallel routes raises questions about whether the trunk roads network has been properly defined.

Finally, there are opportunities thrown up by the creation of a new tier of regional Government. There would appear to be substantial scope for further de-trunking if and when Regional Authorities are established. The M5 south of Bristol could, in theory, be devolved to a South Western Regional Authority, while the A11 and A12 could be run by an East Anglian Authority.

The major advantages of de-trunking are as follows. Firstly, it would bring decision-making on roads closer to the people who use them. If the overwhelming majority of users on a given section of road are relatively local, it makes sense for them (and the residents alongside it) to have a direct say in its management. This would fit nicely with the principle of subsidiarity.

Secondly, as we've explained above, the two-tier system for managing roads creates distortions. It encourages local highway authorities to lobby for national funds to upgrade trunk roads in their area as a means of solving local traffic problems. This then leads to the trunk roads network being mis-used. Detrunking all but those roads which are of genuine importance to through traffic would remove as many of these distortions as is practicably possible.

The major disadvantages relate to the needs of long distance travellers. It could be argued that detrunking would lead to underprovision or different standards of provision for these users. On the other hand, the mis-use of the network for local travel clearly impedes long distance travel at present. And the retention of a limited network of vital strategic trunk routes would guarantee that the interests of free movement around the country could be maintained.

“What role for trunk roads in England?” asks whether some trunk roads should be transferred to local authorities or regional bodies or vice-versa²⁴. In response, Friends of the Earth would argue that Government should:

define precisely the purpose of the trunk roads network and, in particular, what long distance through traffic is,

assess which parts of the network really are important for long distance through traffic, and

classify the network according to whether the roads are nationally, regionally or only locally important

detrunk and devolve control of those that are of only local importance to local government.

hold those of regional importance in trust until properly constituted regional authorities have been established to manage them.

The role of the network in an integrated transport policy

“What role for trunk roads in England?” argues that: *“by any measure the trunk road network is a key part of our transport system and of the economic and social fabric of the country”*²⁵. Friends of the Earth accepts that the trunk roads network is important, but believes its importance has been overstated.

We have already shown that most trips are very short. As a result, many people use the trunk roads network rarely or infrequently. Research carried out in the preparation of the Green Paper *“Paying for Better Motorways”* suggested that almost half of drivers used the motorway network less than once a month²⁶. Although the proportion who use the trunk road network will be higher, it is still likely that many drivers use the network relatively infrequently. And, of course, many people who do not have access to a car will scarcely use it at all. By contrast, almost everybody uses local roads every day.

Furthermore, research quoted above, suggests that the bulk of the annual cost of congestion on our roads occurs is due to congestion in urban areas²⁷. As much as 28% of the costs are incurred in London, 32% in the other main conurbations and another 32% in other urban areas. It is not possible, using this research, to disaggregate the level of congestion on non-motorway trunk roads from that on non-trunk parts of the principal road network, but it suggests that most congestion occurs on local roads.

Finally, of course, very few people live on trunk roads. As a result, the environmental effects of trunk-road traffic on communities alongside trunk roads are dwarfed by the environmental effects of traffic more generally. The overwhelming proportion of the 11% of the UK population which is estimated to be bothered by road traffic noise²⁸ do not live on or even near trunk roads. The vast majority of people who suffer from air pollution do not live on or near trunk roads. Very few of the millions of parents who feel impelled to walk or drive their children to school have to cross trunk roads on the way.

There is little justification, in our view, for allocating almost two-thirds of the money invested in roads in a given year to investment in the trunk roads network. A far more pressing priority is the relief of urban congestion and traffic nuisance through the provision of better public transport, facilities for cyclists and pedestrians and environmental relief to the thousands of streets up and down the country which suffer from excess traffic.

This conclusion, we feel, is mirrored in parts of the discussion paper *“Developing an integrated transport policy”*. This says clearly that *“the forecast growth in road traffic is unacceptable, because of its economic and environmental effects”*²⁹ and that the *“aims of better and more integrated public transport systems, of more environmentally acceptable cars and car use and more efficient and environmentally sustainable freight transport”* lie at the heart of the policies which the Government intends to develop³⁰.

Furthermore, it adds that *“reducing our dependence on the car and lorry through providing genuine alternatives, and promoting greater use of more attractive public transport, and safer walking and cycling, is central to achieving a more sustainable transport system”*³¹.

It is difficult to see how investing substantial sums of money in the trunk road network will contribute to meeting these aims and easy to see how it would encourage traffic growth.

“What role for trunk roads in England?” asks what role should the trunk road network play in an integrated transport strategy³². Friends of the Earth’s answer would be that the development of the trunk road network should be subservient to the integrated transport strategy, and that it has a relatively minor role to play within it. A fundamental feature of the shift to an integrated transport policy must be a shift in the balance of resources away from investment in the trunk road network to the provision of alternatives to the car.

How should trunk road investment be planned in the future

To counter some of the problems identified above, where local authorities argue for trunk road improvements in the hope that they will solve local traffic problems, we believe that proposals for the management and improvement of the trunk road network should form part of wider regional and county transport plans, covering all modes.

In this way, they can be considered alongside other options for solving the same problems and the problems that they are designed to solve can be prioritised against other problems in the region concerned. This would also enable any differences in policy between central and local Government to be discussed and resolved. That is why Friends of the Earth welcomed the previous Government's consultation on a new approach to trunk road planning³³ and the draft Supplement to Planning Policy Guidance Note 13 that was issued earlier this year³⁴. This is clearly a step forward. We were particularly pleased to see advice included in the Supplement that road schemes should only be proposed after other transport options have been fully explored.

However we believe further improvements could be made to the system. In particular, we are concerned that insufficient guidance is given on the steps that need to be undertaken to assess road projects prior to their inclusion in regional guidance. At present, the draft guidance says that regional conferences should contact the local Network and Customer Services division of the Highways Agency, who will then prepare a report "*on the current and likely future pressures on trunk roads relevant to the region, together with existing major programmed improvements and any relevant route strategies*"³⁵.

It also says that "*alternative land use and transport strategies should be analysed for their contribution towards sustainable development and their implications for transport demand*"³⁶, and that "*any new proposals for infrastructure improvements (or alternatives to existing proposals) should be defined in broad terms only*"³⁷. In this instance, "*in broad terms*" is defined to mean that "*the level of detail should be no more than the lists of schemes traditionally included in the published trunk road programme, with a short explanation of the reasons for each scheme*".

Friends of the Earth is concerned that this may enable regional conferences to do little more than rubber stamp existing proposals after a cursory analysis of a Highways Agency report based on "*predict and provide*" methodologies. We would prefer additional guidance be issued to integrate regional and local planning with route strategies and the package approach.

We still envisage that the regional conferences should contact the Highways Agency. However the report provided should be prepared in conjunction with the local highways authority or authorities, coach and train operating companies and Railtrack. It should be based on a series of modified *route identification studies* that look at the traffic flows on the trunk road corridors and consider, explicitly, the balance of local and through traffic at any given point. These route identification studies could then make some broad conclusions about the needs of through traffic (including whether additional provision should be made by road and/or rail) as well as what measures might be possible to remove local traffic from the trunk road network at particular places.

This would then make it possible for the regional conference to make broad recommendations to the Secretary of State on the balance of investment in road and rail in a given corridor, on places where investment in either is required (for the purposes of through traffic) and on places where the Highways Agency and local highway authority need to work together (with other agencies) to develop packages to remove local traffic from the trunk road network.

“What role for trunk roads in England?” invites view on the role of local authorities and regional bodies in trunk road planning³⁸. Friends of the Earth, as laid out above, believes that all proposals for trunk road investment should be assessed by local authorities and regional bodies through discussions on regional guidance as informed by route identification studies that clearly distinguish between the needs of through and local traffic. Clearly, the final say on the development of those parts of the network that remain trunk roads should rest with the Secretary of State.

Funding and Commercialisation

Friends of the Earth has no preference in principle as to whether road infrastructure should be provided by the private or public sector. We do have a preference however for publicly-accountable systems that take into consideration all the external costs and benefits of a transport project and the travel it entails.

We therefore believe that any proposals for private finance of the trunk roads network should be subjected to the same consideration by regional conferences as publicly funded schemes.

Furthermore, we remain extremely sceptical about the benefits of private finance in respect of roads. We were strongly resistant to the previous Government's proposals for motorway charging which we felt were inefficient and would only deter heavy vehicles from using motorways³⁹.

We have yet to be convinced that procedures such as "Design, Build, Finance and Operate" (DBFOs) represent good value for money. There are sound reasons for suspecting that they do not. We welcome the Government's decision to suspend the "DBFO" tender process that was underway at the time the roads review was announced. We would urge the Government to suspend all progress on "DBFO" contracts until the National Audit Office has completed and published its review of the "DBFO" contracts signed so far.

Our experience of the process by which the proposed Birmingham Northern Relief Road was approved does not instill confidence about the use of the procedures laid out in the New Roads and Streetworks Act 1991. The fact that Ministers appear to have been influenced in their decision by compensation provisions in a confidential concession agreement, signed before the public inquiry was even started, is little short of scandalous⁴⁰.

We are also extremely sceptical about existing practices for securing contributions toward improvements to roads from developers. In many cases these contravene the spirit, if not the letter, of Government policy guidance on transport, which seeks to "*reduce growth in the length and number of motorised journeys*" and "*reduce reliance on the private car*"⁴¹. We are concerned that some developments may be given the go ahead, after contributions been secured for improvement to the trunk road network, when they would have been rejected if contributions had not been forthcoming⁴².

"What role for trunk roads in England" asks how public/private partnerships should be developed in road investment, and what further opportunities exist for improving the funding of trunk road investment⁴³.

Friends of the Earth believes that the great majority of funds for the trunk roads network should still come from the public purse. Great care should be taken when considering options for the use of private funds to ensure that they represent genuine, long-term value for money and that they entail no erosion of democratic accountability or the individual's right to comment on and object to proposals.

Assessing options for trunk road improvements

We have said above that we favour a process by which improvements to the trunk road network are considered through discussions on regional guidance, as informed by route identification studies that explicitly assess the balance of local and through traffic at any given point. However, we have not how said they should be assessed or what weight should be given to the different objectives of transport policy. Here we do so.

The Proposed Criteria

Friends of the Earth applauds the use of the five criteria the Government has identified as fundamental to the review and the objectives inherent in them. Broadly, we are sympathetic to the inclusion of each of them, however we wish to comment on the balance between them and on their application.

Friends of the Earth believes that it is of paramount importance that the management of the trunk roads network is set within and subservient to an integrated transport policy. We applaud the statement in *“What role for trunk roads in England?”* that *“integration is fundamental to our approach and the key to a successful transport strategy”*⁴⁴. We also believe that transport policy as a whole should be set within a framework of sustainable development.

The UK Roundtable on Sustainable Development has defined the principles and goals of a sustainable, integrated transport policy⁴⁵. We do not wish to explore these in detail at this point, as we shall do in our response to the Government’s consultation on the integrated transport policy. However, it is briefly worth listing their implications for the trunk roads network and the balance between, and application of, the proposed criteria.

The Balance of the Criteria

Firstly, the Roundtable’s report identified six goals of a sustainable transport policy. These include that *“sustainable development should operate within critical ecological limits”*⁴⁶. In respect of this goal, the Roundtable’s report goes on to say:

“While some types of natural capital can be readily substituted (ie: traded off) for other types of natural and/or physical capital, there are environmental resources, goods and services which are unique and irreplaceable. These make up society’s stock of critical natural capital, and should be protected. For example, a range of fossil and carbon fuels can be substituted with each other to generate energy; but, there is no substitute for clean air, stable weather systems or unspoilt wildlife habitats which support populations of scarce or threatened species.

“Similarly, there are many irreplaceable cultural and historically important features of rural and urban environments for which there are no substitutes. These include ancient monuments, historic town centres and listed buildings, and sites of archaeological significance. These too should be conserved, and protected from damaging development, because they make up society’s stock of critical physical capital.

“There may be occasions when essential economic or social needs can only be met through development activities which damage or even destroy critical natural or physical capital. In these cases, the economic and/or social costs of preventing such losses may be so high, or technically difficult to do, that they are deemed unavoidable. In such extreme circumstances, society may tolerate these losses, even through compensating resources are not available. However, there should be the strongest reasonable presumption against making such trade-offs, and losses to critical natural or physical capital should only be tolerated for the most pressing reasons, such as to protect human life, maintain public health or safety, or similar imperative reasons of over-riding public interest”⁴⁷

This has implications for the application of the proposed criteria. Despite what has been said above, about the relatively minor role the trunk roads network should play within the integrated transport policy, and the obvious implications that has for the transfer of funds away from road investment toward better public transport and facilities for cyclists and pedestrians, it is also important that the need to protect critical natural and physical capital is reflected in decision-making on trunk road investments.

This has not been the case in the past. The construction of new or improved trunk roads has had a devastating effect on a number of nationally important wildlife sites, protected landscapes, ancient monuments and battlefields. The controversies surrounding the M3 through Twyford Down or the A34 Newbury Bypass are well known: the damage done to Folkestone Warren and Aston Rowant National Nature Reserve less so. Many trunk road proposals still threaten Sites of Special Scientific Interest (SSSIs), Areas of Outstanding Natural Beauty (AONBs) and a range of cultural monuments, including properties of the National Trust. Examples include the A259 schemes in East Sussex, the A650 Bingley Relief Road in West Yorkshire and the A5 Dunstable Bypass on the Bedfordshire/Hertfordshire border.

Friends of the Earth has long believed that the protection given to SSSIs and AONBs through Government policy statements on roads is inadequate. We would contrast the phraseology used to indicate policy in this area with the protection given to National Parks. In the White Paper “This Common Inheritance”, this was as follows:

“The Government has a long-standing policy of keeping roads away from protected areas such as Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest wherever possible. ... In National Parks, the Government is committed to ensuring that no new trunk road will be constructed and no existing road will be upgraded unless there is a compelling need which cannot be met by any reasonable alternative means”⁴⁸.

To our minds, the degree of protection implied for National Parks is far greater than that implied for SSSIs and AONBs. And in our experience, the degree of protection from trunk road construction given to National Parks is far greater than that given to SSSIs and AONBs.

Prior to the General Election, Labour said it was “opposed to building roads through sites of special scientific interest” and promised to “operate the strongest possible presumption against such construction”⁴⁹. However, decisions announced concurrently with the launch of “What role for trunk roads in England?” will, if implemented, lead to serious damage to at least three SSSIs⁵⁰.

Friends of the Earth applauds the increased level of protection offered by the Government to SSSIs, but feels sterner measures are needed to ensure it is reflected in future decisions. To that, we suggest the Government explicitly gives SSSIs and AONBs a similar level of protection to that afforded to National Parks by promising that no new trunk road will be constructed and no existing road will be upgraded through an SSSI or AONB unless there is a compelling need which cannot be met by any reasonable alternative means. **This implies that the prevention of environmental impact should be given a greater degree of priority than it has in the past.**

Secondly, another goal in the Roundtable's report was that "*sustainable development should satisfy economic, environmental and social needs in the present and in the future, and maintain the economic and environmental means to do so*"⁵¹. This was clarified through a third goal which said that "*sustainable development should minimise activities that cause serious environmental damage, ensure that renewable resources are managed and used in ways which do not diminish the capacity of ecological systems to continue providing these resources, and ensure that non-renewables are managed and used in ways which account for future needs and the availability of alternative resources*"⁵².

Although the application of these goals has far more to do with the integrated transport policy and the development of the economy as a whole, it is worth noting their implications for trunk roads. First and foremost, it should be said that traffic growth implies an increase in an activity that causes "*serious environmental damage*" and an increase in the use of non-renewable resources with complete disregard for the needs of future generations.

Yet the appraisal framework used to assess road schemes scarcely takes these issues into account. On the one hand, the economic appraisal treats all time savings for road users as benefits, even if, in so doing, it leads to road-building that encourages development in undesirable places. It even treats generated traffic as a benefit, save if it leads to a disproportionate amount of additional congestion. And, of course, through being based on traffic forecasts that fail to take account of the ability of the road network to accommodate additional traffic, the traffic models that are used to input into the economic appraisal seriously over-estimate the level of congestion should a road not be built and seriously under-estimate the amount of traffic that could be generated should it go ahead. On the other hand, the environmental assessment fails to consider most of the cumulative effects of road-building at all⁵³.

Friends of the Earth believes that significant improvements have been made over the last decade in the way road proposals are assessed. Volume 11 of the Design Manual for Roads and Bridges⁵⁴ is vastly superior to the old Manual of Environmental Appraisal⁵⁵. The changes made to COBA have been a more modest but still important improvement. The greater systematisation of economic and environmental assessment at an earlier stage in the planning process (including before roads programme entry) is also to be welcomed.

However, good though this evolution has been, Friends of the Earth believes that more revolutionary changes are needed if the trunk roads programme is to be properly integrated with the Government's transport policy as a whole. We are impressed with the potential of 'objectives-led' methods of assessing transport measures and believe that the Government should look into how this approach could be used to assess trunk road proposals.

“What role for trunk roads in England?” asks how a balance should be struck between the criteria; whether there are aspects of the application of cost-benefit appraisal as applied to road investments which could be improved; how environmental factors should be weighed against economic and safety factors and how alternative means of solving transport problems could best be incorporated into the appraisal process.

Friends of the Earth believes, that the current two-pronged assessment methodology, incorporating a succession of incomplete cost-benefit analyses and environmental assessments needs a dramatic overhaul. We do not have confidence that it can be easily amended to allow the appraisal of alternative means of solving transport problems. The Government should look to develop ‘objectives-led’ approaches instead.

Although the major changes in transport policy, demanded by the needs of sustainable development, are beyond the scope of this review, there are some changes that are required to the balance that is struck between different factors in decision-making on roads. Friends of the Earth believes that the strongest possible presumption should be given to the protection of natural and physical capital, and that as a measure of this, the Government should promise to give SSSIs and AONBs a similar level of protection to that currently given to National Parks. This implies that the prevention of environmental impact should be given a greater degree of priority than it has in the past.

Accessibility

We welcome the inclusion of accessibility as a criteria by which the roads programme will be reviewed. We welcome also the recognition that this *“might involve either appropriate means of transport or ensuring that the facilities we need to get to are closer together”*⁵⁶.

Friends of the Earth would support the inclusion of equity aims as a component of transport policy. Friends of the Earth believes that the promotion of equity is an essential feature of truly sustainable development⁵⁷.

There is a lot of evidence to suggest that access to different forms of transport, particularly cars, is very unevenly distributed within society. For example, 58% of the poorest fifth of households have no access to a car, whereas only 4% of the richest fifth of households are in this position⁵⁸. Furthermore, 65% of women do not have first access to a car (whereas 64% of men do)⁵⁹. Only 28% of pensioners have first access to a car (as opposed to 59% of those aged 30-59)⁵⁵. Obviously no children aged 16 and under have first access to a car. People who do not have access to a car tend to travel less⁶⁰ but use the bus more⁶¹.

Furthermore, data from the 1989/91 survey shows that 19% of households in rural areas had no car⁶², while 44% had only one car. These households are unlikely to have access to frequent bus services either. The mobility of many people in rural areas is severely constrained either because they have no car or because another member of the household is using it.

There is also good evidence that different groups within society suffer from the environmental effects of transport to different extents. The very young and the very old are particularly susceptible to air pollution⁶³. Many poorer communities are also forced to live in areas where air pollution is bad, and people within them are more likely to suffer from illnesses that make them susceptible to air pollution. The young (albeit a different age group to those that suffer most from air pollution) and the old are also more likely to die in road accidents than other members of society⁶⁴. There is also evidence that children in poorer households are disproportionately more likely to be killed or injured in road accidents⁶⁵.

Disturbingly, the groups who suffer most from transport are often those that use it least. The poor, the old and young children are all less likely to own and travel in cars than other members of society. Yet these groups are the ones most at risk from air pollution and road accidents.

Again, we believe that the inclusion of equity has implications for transport policy as a whole rather than the trunk road network in particular. It would strengthen arguments for measures to prevent traffic growth and, especially, for the transfer of resources away from trunk roads toward the provision of better public transport and facilities for cyclists and pedestrians. The poor, the old and the young, who travel least but suffer most from current transport policies, will gain little from further investment in trunk roads.

We do not believe that an equity argument for investment in the trunk road network could be justified through the benefits to people with walking difficulties, as data from the National Travel Survey shows such people walk more, use buses more and use cars less than the average citizen⁶⁶.

“What role for trunk roads in England?” asks how far equity aims should be a matter for transport policy. Friends of the Earth believes that equity should be a fundamental feature of the integrated transport policy. We also believe, in respect of trunk roads, that the promotion of equity can best be achieved through the transfer of funds away from the trunk road network to the provision of better public transport and facilities for cyclists and pedestrians.

“What role for trunk roads in England?” also asks whether there are other aspects of accessibility to be considered. Friends of the Earth believes there are, particularly the role of the trunk roads network, and investment in it, in encouraging development that is inaccessible by any other means than the car. This provides yet another reason for transferring funds from trunk roads to alternatives to the car.

Safety

Friends of the Earth fully accepts the need for measures to be implemented to reduce the number and severity of accidents on the trunk road network. We are also aware, however, that in comparison to other types of road, much of the trunk road network has relatively low accident rates (albeit in some cases, over average fatality rates).

Although the Highways Agency manages a valuable programme of low cost safety improvements to the trunk road network, much of the money it spends on trunk roads, in the name of safety, is spent on major construction projects. “*What role for trunk roads in England?*” recognises this and says that “*the safety benefits of bypasses and other larger road schemes are a significant proportion of the total scheme benefits*”⁶⁷. It is worth noting, however that few, if any of these major construction projects could be justified on safety grounds alone⁶⁸. Typically only about 20% of a scheme’s benefits relate to safety and the accident savings forecast are rarely if ever sufficient to justify the projects, unlike the schemes funded through the local safety budget.

In the past, we have argued that this road-building is an extremely costly way of reducing accidents and that money for major road construction projects would be better spent on low-cost accident remedial measures on both trunk and local roads, and on traffic calming⁶⁹. We maintain that view which was shared at the time by the Parliamentary Advisory Council for Transport Safety.

We find it disturbing that this issue isn’t explicitly addressed in the consultation document and are doubly concerned that instead, the implication is given that a conflict exists between safety schemes and the environment.

In our experience, there is very rarely a conflict between genuine safety schemes and the environment. In fact, the twin goals of saving lives and improving the environment often go hand in hand. Friends of the Earth has supported, for example, proposals for traffic calming on the trunk road network. We have also supported the use of variable speed limits on M25, which was justified as a measure that simultaneously improved traffic flow, reduced accidents and reduced the need for road widening. We would, given the opportunity, support a wider reduction in speed limits on trunk roads.

That being said, we would be interested to hear more from the Department of examples of genuine safety schemes which conflict with the environment.

“*What role for trunk roads in England?*” asks how much of the roads budget should be devoted to safety schemes? We believe this is an inappropriate question. A far better question would be to ask whether the money that is currently spent in the name of safety is being wisely spent. That proportion that is spent on road-building would be more profitably spent on low-cost accident remedial measures on trunk and other roads.

“*What role for trunk roads in England?*” asks how a balance should be struck in cases where safety schemes would conflict with the environment. Friends of the Earth thinks that in almost all cases this is a false dichotomy and that in many cases schemes that are good for the environment are good for safety. We would be interested to hear more from the Department of cases of genuine safety schemes where it feels there is a conflict with the environment.

Economy

“What role for trunk roads in England?” argues unsurprisingly that *“an effective trunk road network is crucial to UK competitiveness”*⁷⁰. However it admits *“the links between new transport infrastructure and regeneration are not well understood”*⁷¹

Friends of the Earth has long believed that the links between the provision of new transport infrastructure and economic development are more complex than they have been presented by Government in the past. We even sponsored a PhD student to investigate the relationship in the 1980s⁷². We therefore welcomed the invitation by the previous Government to the Standing Advisory Committee on Trunk Road Assessment (SACTRA) to look into the issue. We also welcome the Government’s acceptance that the links *“are not understood”*.

Because SACTRA is currently considering the issue, we don’t think it would be sensible for us to review the relationship in detail here. However we do take the opportunity of giving short responses to the specific questions asked in the consultation.

***“What role for trunk roads in England?”* asks what the priorities should be for roads investment to assist regeneration, and what impact would such road-building be likely to have. Friends of the Earth reviewed this question as part of its evidence to the public inquiry into the Bristol Spine Road in 1992⁷³. At the time we concluded that the priority was for local access roads in the immediate vicinity of particular sites, rather than improvements to the strategic network. The likely impact was dependent on other factors, including the characteristics of the sites themselves and the skills of the local labour force. We have no reason to change our view.**

***“What role for trunk roads in England?”* asks what the priorities should be for roads investment to improve business competitiveness, and what impact would such road-building be likely to have? From previous work on the issue, Friends of the Earth believes that travel costs represent only a small fraction of total business costs and that road-building will generally make a minor difference to total travel cost. Road-building of any sort is not a priority for the improvement of business competitiveness in the UK. However, one likely outcome from a programme of strategic road-building to improve competitiveness would be an increase in the rate of traffic growth.**

The question of how business can reduce its own demands on the trunk road network is obviously addressed primarily at businesses. However we would pay credit to those that have set up green commuter plans.

Environmental Impact

We welcome the acceptance in *“What role for trunk roads in England?”* that trunk road improvement needs to be sustainable and that *“short run gains are not negated by wider or longer run damage”*⁷⁴. Short run gains being negated by wider or longer run damage is exactly what we feel previous investments in the trunk road network have caused.

Friends of the Earth maintains its belief that the cumulative effect of trunk road construction over the last forty years has been a disaster for the environment: through the direct impacts of road-building on habitats; through the direct impacts of road-associated development on habitats; and through the encouragement and facilitation of traffic growth.

We have drawn attention to the damage done by road-building in a series of publications over the last decade⁷⁵, and we do not intend to do so again here.

However, there are two issues to which we would like to draw particular attention.

Firstly, the consultation document rightly says that *“bypasses have their supporters and opponents”*⁷⁶. Friends of the Earth would accept that bypasses can *“take noisy polluting traffic out of towns and villages and allow traffic calming and other measures to improve the urban environment to be implemented”*.

However, as our recent report *“Better than Bypasses”*⁷⁷ demonstrates building bypasses is expensive. For the price of just a few trunk road bypasses, traffic reduction packages could be implemented in dozens of towns. Furthermore the effect of many bypasses is often limited, especially as the size of community to be bypassed increases. The larger the town or city, the smaller the proportion of traffic within it that is travelling through and the smaller the benefits of a bypass will be. This fact was recognised by the US Government as early as 1939⁷⁸. Finally, in most cases, the provision of a trunk road bypass is not accompanied by any traffic calming or measures to improve the urban environment at all. The mechanisms used to fund trunk road bypasses are completely separate from the mechanisms used to fund improvements in the communities bypassed. Funding for the latter, if approved at all, can be delayed for many years after the construction of the bypass has been finished.

A copy of *“Better than Bypasses”* is enclosed.

“What role for trunk roads in England?” asks how the benefits of bypasses should be weighed against the damage they do to the countryside. This is a political decision which can best be made through the development of an ‘objectives-led’ approach to decision-making for the roads programme as a whole. However, Friends of the Earth believes that at present the money allocated toward trunk road bypasses would be better spent on providing less expensive forms of relief to more communities. Furthermore, the proposals we make for substantial de-trunking and for consideration of improvements on the remaining trunk road network through regional conferences should help to ensure that the benefits of any bypasses built are maximised through the simultaneous introduction of traffic calming and improvement schemes on the roads bypassed.

Secondly, Friends of the Earth believes there are occasions when it would be beneficial to close roads to increase the protection afforded to important cultural or natural sites, to allow better provision for alternative means of travel or merely to improve the amenity of an area for the people who live, work or play there. Friends of the Earth would accept that this is unlikely to happen to a trunk road in England.

However, there are many trunk roads which already pass through or nearby sites or areas that are important for wildlife, landscape or heritage. In certain circumstances, we feel it may be appropriate for the Government to invest large sums in re-routeing such roads or in burying sections of them in tunnels. An obvious example is the A303 near Stonehenge. Where such re-routeing or tunnelling takes the trunk road away from a site of significance for wildlife (through which it had previously passed), care should be taken to ensure the land occupied by the original trunk road is restored to as near as possible the quality of the land alongside it.

Furthermore, whenever a trunk new road is provided across a greenfield site, the road or roads bypassed should be taken up and the land restored to the quality of the land alongside.

“What role for trunk roads in England?” asks whether there is a case for environmental improvement of existing roads, and if so, what priority should that be given, bearing in mind the limited resources available. Friends of the Earth believes there are occasions when environmental improvements can substantially reduce the impact of an existing trunk road. However action should be focussed on protecting and enhancing the value of key wildlife sites alongside the trunk road network, rather than in a limited series of cosmetic measures applied to all roads, but which may not be effective.

Tackling Road Congestion

Friends of the Earth is concerned that so much emphasis has been placed in the consultation document on the need to tackle problems caused by congestion. We are particularly concerned that congestion is being considered without any analysis as to its causes (beyond general traffic growth), any analysis of its significance or any analysis of what might or might not be possible to relieve it.

The consultation paper presents a simplistic analysis, extending past trends into the future, to argue that *“on both economic and environmental grounds we need to develop a strategy to deal with increasing congestion”*⁷⁹. It says that *“between 1986 and 1996 traffic on motorways in England grew by 80%, while only 7% was added to the length of the motorway network”*⁸⁰ but doesn't account for why traffic on motorways grew much faster than it did on other roads or even explain why length of the motorway network (as opposed to the width of key sections of it) is a relevant indicator of its capacity.

It uses standard traffic forecasts to argue that *“by 2016 traffic is forecast to be between 36% and 57% higher than it was in 1996 if current policies are continued”*⁸¹ without any analysis to show such an increase is possible. It presents maps showing how congested the motorway network will become but doesn't consider what the effect, if any, new construction, demand management or network management might have on that congestion.

Neither, as we have said above, does it consider whether the congestion on the trunk road network is a result of an increase in the number of long distance journeys, an increase in the distance travelled for journeys that used to be local or an increase in the use of the trunk road network for local journeys.

Friends of the Earth believes a much more sophisticated analysis of the traffic trends on the trunk road network must be carried out before key questions about the best methods for dealing with trunk road congestion can be answered.

However, we also believe, as we have explained above, that the congestion problems facing the trunk road network are relatively minor in comparison with those facing our towns and cities. We know of no reason why congestion on trunk roads should be considered as more important than congestion on other roads.

Friends of the Earth accepts that, if traffic continues to grow as forecast, an increase in congestion on trunk roads is inevitable. However, the solutions to this problem lie in the realm of the integrated transport policy, not with policy toward trunk roads. For that reason we have argued that a substantial transfer of funds from the trunk roads network to the provision of better public transport and facilities for cyclists and pedestrians is needed. This will probably lead to an increase in congestion on trunk roads in the short term.

The Government should aim to manage this congestion, and minimise its negative effects, rather than seek to eliminate it. It should especially seek to avoid generating more traffic through major road-building as this will only make matters worse on other roads.

Managing Demand for Travel by Road

Developing ways of managing demand for travel by road is the key task of the integrated transport policy. There is plenty of evidence to suggest this is possible. Potential policy measures are well known and include the development control system, fiscal policy, local traffic management, the provision of quality alternatives to the car and lorry and voluntary means such as green commuter plans.

However, obviously, the Highways Agency are not key actors in this process. The Department of the Environment, Transport and the Regions, Her Majesty's Treasury, Railtrack, railway operating companies, bus operators, local planning and highway authorities all have a much greater role to play. Trunk road managers must cooperate fully with these other actors in the development of appropriate regional guidance and local traffic reduction packages.

Friends of the Earth believes that even if substantial parts of the existing trunk road network were detrunked, there could still be a role for some demand management measures on trunk roads themselves. These might be needed for two reasons. Firstly, the removal of local traffic might conceivably lead to more people using their cars for longer journeys. There may be a need to constrain this demand by reducing the capacity of sections of the network. Secondly, there may be sections of the network which cannot cope with the level of traffic making long distance journeys. In this case the Department and the Highways Agency may wish to prioritise certain users through, for example, the provision of bus and lorry-only lanes.

“What role for trunk roads in England?” asks what further adaptability there is within the system through changes in the pattern and timing of journeys? Friends of the Earth believes there is substantial potential for further adaption, although this will only delay, not prevent an inevitable increase in congestion, if nothing is done to prevent traffic growth. Friends of the Earth does not believe users should be encouraged to travel at different times of the day, as this would only generate more traffic and encourage freight vehicles to travel at unsocial hours.

“What role for trunk roads in England?” asks what options for managing demand by road should be considered. Friends of the Earth believes this is primarily a question for the integrated transport policy. However potential instruments include the development control system, fiscal policy, local traffic management, the provision of quality alternatives to the car and lorry and voluntary means such as green commuter plans.

“What role for trunk roads in England?” asks what impact such measures would have in terms of the Criteria. Friends of the Earth believes the impact would be overwhelmingly positive, particularly in terms of the environment, but also in terms of social inclusion.

“What role for trunk roads in England?” asks whether, in any attempt to manage demand, priority could or should be given to certain types of traffic. Friends of the Earth believes that, even on the trunk road network, there is scope for giving greater priority to buses and freight vehicles and that this should be investigated.

Making better use of the existing road infrastructure

Although, the trunk road network is not particularly significant in the development of demand management measures within the integrated transport policy, there is scope for minimising the extent of, and effects of, increasing congestion on it. Friends of the Earth has therefore supported the use of ramp metering and variable speed limits by the Highways Agency.

However care needs to be taken to ensure that the use of these tools does not lead to an increase in traffic that then causes greater problems on other roads. The Highways Agency needs to consult with local highways authorities to ensure that if measures on trunk roads have an adverse effect on local roads, this is taken into account in the development of local traffic reduction packages.

“What role for trunk roads in England?” asks what the objectives of a network management strategy should be. Friends of the Earth believes it should aim to minimise the extent of and the effects of increasing congestion without leading to any increase in traffic.

“What role for trunk roads in England?” asks what potential measures should be considered. Friends of the Earth believes a wide range of measures are feasible including ramp metering, variable speed limits and a lower overall speed limit.

“What role for trunk roads in England?” asks how the impact of potential trunk road measures on the local road network should best be taken into account. Friends of the Earth believes that the Highways Agency needs to work closely with local highway authorities to ensure such effects are minimised and that any impacts that do occur are taken into account in the development of local traffic reduction packages. However, we would stress that Friends of the Earth seeks to minimise use of the trunk road network by local traffic, not in a way that simply moves the traffic onto local roads, but by getting people and businesses to reduce their use of cars and lorries.

“What role for trunk roads in England?” asks whether emphasis should be given to encouraging travel at less congested times of day? Friends of the Earth believes this would be counter-productive. It would generate more traffic and merely delay the implementation of measures to reduce car and lorry use. By encouraging more temporally dispersed lifestyles, it would make the inevitable traffic reduction more difficult.

“What role for trunk roads in England?” asks what priority should be given to network control measures to relieve congestion both in the short and long term. Friends of the Earth believes that low cost measures can be useful in minimising the extent of, and effects of, increasing congestion. However, care will need to be taken in their implementation to ensure they do not lead to extra traffic by removing congestion that suppresses demand.

“What role for trunk roads in England?” asks what role there is for new technology to assist in the efficient operation of the network. Friends of the Earth believes there is plenty of scope for using new technology, for example, to enforce bus and lorry priority measures or variable speed limits.

Creating New Infrastructure

New strategic road-building should not be a priority, save in very special cases, mainly where the provision of new infrastructure can help to remove a trunk road from the immediate vicinity of an important wildlife or cultural site.

For reasons explained above, there is a far greater need for the money currently allocated to new road-building to be spent on measures to encourage people to use public transport and to cycle or walk.

There may be cases where new road infrastructure might ameliorate congestion without generating additional traffic. However, as SACTRA has pointed out, the greater the likely impact of a new road on congestion, the greater the likely time-savings will be and the greater the likelihood that additional traffic will be generated⁸². Furthermore, the removal of bottlenecks may only serve to move congestion to another point on the network.

Friends of the Earth accepts that there will be a need for road-building to access particular sites, earmarked for development. However, we believe, this is unlikely to lead to construction of new trunk roads.

“What role for trunk roads in England?” asks how bottlenecks might best be dealt with and what the priorities are in respect of them. Friends of the Earth believes that in most cases bottlenecks are best left alone. They can serve a useful function in preventing traffic growth, and their removal cannot be considered a priority. However, there is a need to manage the flow of traffic through bottlenecks to minimise the effects of the congestion they cause.

“What role for trunk roads in England?” asks to what extent new or additional capacity can relieve congestion. Friends of the Earth believes that although new or additional capacity can in the short term relieve congestion, forecast traffic growth is so high that, in the long term, no feasible amount of road-building can possibly prevent congestion from increasing.

“What role for trunk roads in England?” asks how the *“conflicting impacts on the environment, economy and safety”* can be balanced. Friends of the Earth presumes that these conflicting impacts refer to the impacts of new road construction. Friends of the Earth believes that road construction almost inevitably has a negative impact on the environment, rarely if ever benefits the economy and is an extremely inefficient way of reducing accidents. Friends of the Earth believes the best way to resolve these conflicting impacts is to develop policies that simultaneously promote the environment, the economy and safety. Traffic reduction measures can do just that.

“What role for trunk roads in England?” asks whether current environmental standards for new road building are appropriate, and if not, what changes should be made. As we have outlined above, Friends of the Earth believes there is a need for better protection from road-building of our critical natural and culture capital. We have outlined proposals above for strengthening the protection given to Sites of Special Scientific Interest and Areas of Outstanding Natural Beauty.

Conclusion

Purpose of the Network

Friends of the Earth believes that many of the problems associated with the trunk road network arise from a historic failure to clarify its role. In particular, in many key sections, it is being mis-used for local journeys.

Friends of the Earth believes that Government should therefore define precisely the purpose of the trunk roads network and, in particular, what long distance through traffic is. It should assess which parts of the network really are important for long distance through traffic and classify the network according to whether the roads are nationally, regionally or only locally important. It should detrunk and devolve control of those that are of only local importance to local government and hold those of regional importance in trust until properly constituted regional authorities have been established to manage them.

Role of the Network in the integrated transport policy

In the long run, traffic growth is forecast to be so high that no amount of road-building can possibly cope with demand on trunk or local roads. The key task of the integrated transport policy must be to reduce the use of cars and lorries in the UK. This cannot be achieved through the development of the trunk road network, which will only have a minor, subservient role within an integrated transport strategy. A fundamental feature of the shift to an integrated transport policy must be a shift in the balance of resources away from investment in the trunk road network to the provision of alternatives to the car.

Friends of the Earth believes that, in order to ensure that trunk road development fits in with the integrated transport strategy at local, regional and national levels, all proposals for trunk road investment should be assessed by local authorities and regional bodies through discussions on regional guidance as informed by route identification studies that clearly distinguish between the needs of through and local traffic. Clearly, the final say on the development of those parts of the network that remain trunk roads should rest with the Secretary of State.

Friends of the Earth believes that the great majority of funds for the trunk roads network should still come from the public purse. Great care should be taken when considering options for the use of private funds to ensure that they represent genuine, long-term value for money and that they entail no erosion of democratic accountability or the individual's right to comment on and object to proposals.

The Assessment of Roads and the Criteria

Friends of the Earth applauds the use of the five criteria the Government has identified as fundamental to the review and the objectives inherent in them.

Friends of the Earth believes, that the current two-pronged assessment methodology, incorporating a succession of incomplete cost-benefit analyses and environmental assessments needs a dramatic overhaul. We do not have confidence that it can be easily amended to allow the appraisal of alternative means of solving transport problems. The Government should look to develop 'objectives-led' approaches instead.

Although the major changes in transport policy, demanded by the needs of sustainable development, are beyond the scope of this review, there are some changes that are required to the balance that is struck between different factors in decision-making on roads. Friends of the Earth believes that the strongest possible presumption should be given to the protection of natural and physical capital, and that as a measure of this, the Government should promise to give SSSIs and AONBs a similar level of protection to that currently given to National Parks. This implies that the prevention of environmental impact should be given a greater degree of priority than it has in the past.

Friends of the Earth believes that equity should be a fundamental feature of the integrated transport policy. We also believe, in respect of trunk roads, that the promotion of equity can best be achieved through the transfer of funds away from the trunk road network to the provision of better public transport and facilities for cyclists and pedestrians.

Friends of the Earth believes that the trunk roads network, and investment in it, has served to encourage development that is inaccessible by any other means than the car. This provides yet another reason for transferring funds from trunk roads to alternatives.

Friends of the Earth believes the Government should consider whether money that is currently spent in the name of safety is being wisely spent. That proportion that is spent on road-building would be more profitably spent on low-cost accident remedial measures on trunk and other roads.

Friends of the Earth does not accept that there is a conflict between the need to protect the environment and the need to promote safety. However we would be interested to hear more from the Department of cases of genuine safety schemes where it feels there is a conflict.

Friends of the Earth believes that travel costs represent only a small fraction of total business costs and that road-building will generally make a minor difference to total travel cost. Road-building of any sort is not a priority for the improvement of business competitiveness in the UK. However, local road-building in the immediate vicinity of particular sites can help attract investment by improving access, provided other factors such as a good labour supply are also present.

Friends of the Earth believes that at present the money allocated toward trunk road bypasses would be better spent on providing less expensive forms of relief to more communities. Furthermore, the proposals we make for substantial de-trunking and for consideration of improvements on the remaining trunk road network through regional conferences should help to ensure that the benefits of any bypasses built are maximised through the simultaneous introduction of traffic calming and improvement schemes on the roads bypassed.

Friends of the Earth believes there are occasions when environmental improvements can substantially reduce the impact of an existing trunk road. However action should be focussed on protecting and enhancing the value of key wildlife sites alongside the trunk road network, rather than in a limited series of cosmetic measures applied to all roads.

Tackling congestion

Friends of the Earth is concerned that so much emphasis has been placed in the consultation document on the need to tackle problems caused by congestion. We are particularly concerned that congestion is being considered without any analysis as to its causes (beyond general traffic growth), any analysis of its significance or any analysis of what might or might not be possible to relieve it.

Friends of the Earth accepts that, if traffic continues to grow as forecast, an increase in congestion on trunk roads is inevitable. However, the solutions to this problem lie in the realm of the integrated transport policy, not with policy toward trunk roads. For that reason we have argued that a substantial transfer of funds from the trunk roads network to the provision of better public transport and facilities for cyclists and pedestrians is needed. This will probably lead to an increase in congestion on trunk roads in the short term.

The Government should aim to manage this congestion, and minimise its negative effects, rather than seek to eliminate it. It should especially seek to avoid generating more traffic through major road-building as this will only make matters worse on other roads.

Annex - comments on individual schemes

Friends of the Earth is not in a position to make detailed comments about all of the individual schemes considered in Volume 2 of “*What role for trunk roads in England?*”. However there are some schemes that we do feel merit specific comment. These, and our comments on them, are listed below by Government region. Furthermore, many of our local groups have made specific comments about particular schemes in their submissions. The omission of any particular scheme should not be taken as evidence that Friends of the Earth has no objections to it.

North West

A556(M) M6-M56 Improvement

This controversial stretch of new motorway directly damages the Cheshire Green Belt and will add to pressure for further development in a very sensitive area. Recent decisions on the 2nd runway at Manchester airport, the office development at Davenport Green and most recently over the new Manchester United training ground at Carrington show the threat. The scheme was formerly part of wider plans for the Greater Manchester Western and Northern Relief Road, which have since been scrapped. As a significant proportion of the traffic on the proposed road travels into the already congestion Greater Manchester conurbation, Friends of the Earth believes this scheme is a prime candidate for deletion from the programme.

M6 Widening Junction 16-19

This widening forms part of wider plans for the M6 in the West Midlands which link in with the Birmingham Northern Relief Road and the planned widening of the M1 to the M25. Friends of the Earth is concerned with the scale and cost of these proposals which parallel one of the most important rail corridors in the UK (and a priority route in the trans European transport network). Friends of the Earth believes that the strategic upgrade of the West Coast main line should take precedence over any strategic upgrade of the M1 and M6.

Yorkshire and Humberside

A650 Bingley Relief Road

This scheme has been in the Programme for a number of years. It severely damages Bingley South Bog SSSI and runs past a number of sites of significance for industrial heritage. In previous years, plans have existed to upgrade the A650 to the east of Bingley through Saltaire and Shipley. These have now been abandoned due to the impact on these communities. Friends of the Earth believes that, considering its environmental impact and the need to encourage greater use of trains for travel along the Aire Valley, this scheme should be deleted.

West Midlands

Birmingham Northern Relief Road (BNRR)

Friends of the Earth believes the Government's decision to approve the planned Birmingham Northern Relief Road to have been a monumental mistake. If built, the BNRR will severely damage the West Midlands Green Belt, including two SSSIs and encourage further development of green field sites. It will not solve the congestion problems on the M6 which can only be ameliorated through measures to encourage local people to travel more by public transport.

A49 Hereford Bypass

The Hereford Bypass has proved one of the most controversial in the Roads Programme for a number of years. A previous scheme was rejected on an Inspector's recommendation. Friends of the Earth does not believe that the A49 is a road of strategic significance. There are no other improvements currently in the Programme, in respect of the A49. Friends of the Earth believes that the traffic problems of Hereford can best be solved by a traffic reduction package and that the scheme should therefore be deleted.

M6 Widening Junction 11A-16

This widening forms part of wider plans for the M6 in the North West which link in with the Birmingham Northern Relief Road and the planned widening of the M1 to the M25. Friends of the Earth is concerned with the scale and cost of these proposals which parallel one of the most important rail corridors in the UK (and a priority route in the trans European transport network). Friends of the Earth believes that the strategic upgrade of the West Coast main line should take precedence over any strategic upgrade of the M1 and M6.

Eastern

A120 Stanstead-Braintree

This scheme was formerly part of the proposed East-west Route and has been designed with that in mind. Friends of the Earth recognises the problems faced by villages astride the existing A120, but believes the scheme no longer serves any strategic purpose. It should be replaced by a programme of network management measures to limit the threat of traffic to the villages affected.

A5 Dunstable Bypass

This scheme cuts runs between Dunstable and Houghton Regis through Blows Down SSSI and past Houghton Regis Quarry SSSI. It is extremely controversial locally, but serves no strategic purpose. Friends of the Earth believes it should be deleted in favour of a package of measures to alleviate traffic problems in Dunstable.

South West

A31 to Poole Link Road/Poole Harbour Crossing

These schemes serve the Port of Poole which is also served by rail. Both damage SSSIs (Uddens Heath and Poole Harbour). Friends of the Earth understands that it would be possible to develop “piggyback” services to take lorries to and from Poole and the Midlands by rail. Friends of the Earth believes this should take precedence over further road-building.

A303 schemes

These schemes include improvements from Wylde to Stockton Wood, Chicklade Bottom to Mere, Sparkford to Ilchester, the Ilminster Bypass, from Ilminster to Marsh and from Marsh to Honiton. Together they complete the upgrading of the A303 to continuous dual-carriageway standard from the M3 to Exeter. Their construction entails considerable damage to Areas of Outstanding Natural Beauty. Friends of the Earth believes that, in the light of the significance of the landscape through which the A303 passes, the potential of the route itself for tourism and the existence of a parallel railway route, the Government should think again about its plans to upgrade it. A route identification study, similar to that carried out by the Welsh Office for the A5, should be undertaken to determine whether ways of resolving the road’s problems can be developed that are more in keeping with its character.

South East

M25 Widening Junction 12-15 and 15-16

These improvements have proved extremely controversial. Friends of the Earth does not believe they will lead to significant reductions in congestion in the West London area. To that extent they cannot be seen as priorities and should be deleted.

M4 Widening Junction 4b-8/9 and M40 widening Junction 1a-3

These schemes merely widen at great cost already congested sections of motorway that are likely to remain congested even when they are widened. Friends of the Earth believes they do not represent good value for money and should be deleted.

A27/A259 schemes

These include Hastings Eastern Bypass, A259 Bexhill and Hastings Western Bypass, A259 Pevensey-Bexhill Improvement and A27 Polegate Bypass. They were previously part of wider plans to upgrade the entire A27 and A259 from Portsmouth to Folkestone. They are all controversial locally, and several damage SSSIs and/or Areas of Outstanding Natural Beauty.

Friends of the Earth believes that now a decision has been made not to upgrade the south coast route in its entirety, there is little justification for these schemes. The local traffic problems of Hastings are best resolved through a local traffic reduction package.

A3 Hindhead Improvement

This scheme is the final section of the A3, yet to be dualled. It would run in a tunnel under Hindhead Common SSSI. Friends of the Earth believes that if network management measures cannot be shown to resolve the traffic problems at Hindhead, road should be built in tunnel to protect the SSSI.

References

1. Department of the Environment, Transport and the Regions 1997 "What role for trunk roads in England?" Vol 1 para 6
2. Department of the Environment, Transport and the Regions 1997 "What role for trunk roads in England?" Vol 1 para 2
3. Highways Act 1980 [10(2)]
4. Mr Robert Key MP in response to a question by Ms Joan Walley MP Hansard 7 June 1993
5. Department of the Environment, Transport and the Regions 1997 "What role for trunk roads in England?" Vol 1 para 8
6. Royles M 1995 "Literature review of short trips" TRL Project Report 104 UG49 Table 1
7. Department of Transport 1995 "National Travel Survey 1992/94" [Table 3.7]
8. Department of Transport 1993 "M25 Junctions 12-15 - Proposals for Link Roads: Statement in response to public consultation" [Figure 2]
9. Sheppard D/The Department of Transport 1994 "Birmingham Northern Relief Road: Evidence of justification and need for BNRR" Volume 1 [6.4]
10. Metropolitan Transport Research Unit 1995 "End of the Road: managing Newbury's traffic to reduce congestion and pollution without a Western bypass" Friends of the Earth [p.5]
11. Metropolitan Transport Research Unit 1995 "End of the Road: managing Newbury's traffic to reduce congestion and pollution without a Western bypass" Friends of the Earth [Appendices]
12. Confederation of British Industry 1995 "Missing Links; settling national transport priorities" [1-2]
13. Confederation of British Industry 1995 "Missing Links; settling national transport priorities" [181]
14. Confederation of British Industry 1995 "Missing Links; settling national transport priorities" [186]
15. Department of Transport 1989 "Roads for Prosperity" [6]
16. Department of Transport 1989 "Roads for Prosperity" [16]
17. Royal Commission on Environmental Pollution 1997 "Transport and the Environment - developments since 1994" 20th Report [6.9]
18. Dodgson J and Lane B 1997 "The costs of road congestion in Great Britain: a NERA briefing paper" National Economic Research Associates
19. Institution of Highways and Transportation 1991 "Traffic congestion on the inter-urban road network" Table 2
20. Standing Advisory Committee on Trunk Road Assessment 1994 "Trunk Roads and the Generation of Traffic" HMSO [4.14]
21. British Road Federation 1994 "Trunk Roads: the local view"
22. Examples include junction 3 of the M63, junction 6 of the M6, the A180, junctions 21, 24, 28 and 34 of the M1, the A52, A46 and many more.
23. The Highways Agency 1996 Answer given under cross-examination by Save the Brede Valley at the public inquiry into the Hastings bypasses.
24. Department of the Environment, Transport and the Regions 1997 "What role for trunk roads in England?" Vol 1 [41]
25. Department of the Environment, Transport and the Regions 1997 "What role for trunk roads in England?" Vol 1 [2]
26. Department of Transport 1993 "Paying for Better Motorways"
27. Dodgson J and Lane B 1997 "The costs of road congestion in Great Britain: a NERA briefing paper" National Economic Research Associates
28. Mason K 1993 "The future road transport noise agenda in the UK" The UK Environmental Foresight Project/Centre for the Exploitation of Science and Technology p. 2
29. Department of the Environment, Transport and the Regions et al 1997 "Developing an Integrated Transport Policy" [5]
30. Department of the Environment, Transport and the Regions et al 1997 "Developing an Integrated Transport Policy" [4]
31. Department of the Environment, Transport and the Regions et al 1997 "Developing an Integrated Transport Policy" [7]
32. Department of the Environment, Transport and the Regions 1997 "What role for trunk roads in England?" Vol 1 [24]

33. Department of Transport 1996 *“Transport - the way forward”* [Annex 1]
34. Department of the Environment/Department of Transport 1997 *“Planning Policy Guidance 13 Supplement: Regional Planning Guidance and Transport”*
35. Department of the Environment/Department of Transport 1997 *“Planning Policy Guidance 13 Supplement: Regional Planning Guidance and Transport”* [11]
36. Department of the Environment/Department of Transport 1997 *“Planning Policy Guidance 13 Supplement: Regional Planning Guidance and Transport”* [8]
37. Department of the Environment/Department of Transport 1997 *“Planning Policy Guidance 13 Supplement: Regional Planning Guidance and Transport”* [9]
38. Department of the Environment, Transport and the Regions 1997 *“What role for trunk roads in England?”* Vol 1 [43]
39. Friends of the Earth 1993 *“Paying for Better Motorways: Response from Friends of the Earth”*
40. get reference for influence of compensation payments.
41. Department of the Environment/Department of Transport 1994 *“Planning Policy Guidance: Transport”* PPG13 Forward
42. Examples include development at Teesside Airport, near Otterburn in Northumberland and north of Warrington.
43. Department of the Environment, Transport and the Regions 1997 *“What role for trunk roads in England?”* Vol 1 [38]
44. Department of the Environment, Transport and the Regions 1997 *“What role for trunk roads in England?”* Vol 1 [24]
45. UK Roundtable on Sustainable Development 1996 *“Defining a sustainable transport sector”*
46. UK Roundtable on Sustainable Development 1996 *“Defining a sustainable transport sector”* Part II Working Paper prepared by the subgroup [35]
47. UK Roundtable on Sustainable Development 1996 *“Defining a sustainable transport sector”* Part II Working Paper prepared by the subgroup [36-38]
48. Department of the Environment et al 1990 *“This Common Inheritance: Britain’s Environmental Strategy”* [7.37]
49. The Labour Party 1996 *“Consensus for Change: Labour’s transport strategy for the 21st century”* [p. 19]
50. The construction of the Birmingham Northern Relief Road will damage the River Blythe SSSI and Chasewater Heath SSSI while the A2/M2 damages Cobham Woods SSSI.
51. UK Roundtable on Sustainable Development 1996 *“Defining a sustainable transport sector”* Part II Working Paper prepared by the subgroup [25]
52. UK Roundtable on Sustainable Development 1996 *“Defining a sustainable transport sector”* Part II Working Paper prepared by the subgroup [31]
53. MacLaren D and Higman R 1993 *“Environmental impact assessment of highways in the UK”* PTRC 21st Summer Annual Meeting, Seminar on Highways
54. Department of Transport 1993 *“Design Manual for Roads and Bridges: Volume 11 Environmental Assessment”*
55. Department of Transport 1983 *“Manual of Environmental Appraisal”*
56. Department of the Environment, Transport and the Regions 1997 *“What role for trunk roads in England?”* Vol 1 [25]
57. Friends of the Earth 1997 *“Tomorrow’s World”* Earthscan
58. Department of Transport 1995 *“National Travel Survey 1992/94”* [Table 3.4]
59. Department of Transport 1995 *“National Travel Survey 1992/94”* [Table 3.1]
60. Potter S 1997 *“Vital Travel Statistics: a compendium of data and analysis about transport activity in Britain”* Transport 2000/Local Transport Today/The Open University [Table 6.4] See also pages 54-59 for a discussion on how travel varies by income, age and sex.
61. Department of Transport 1995 *“National Travel Survey 1992/94”* [Tables 4.2]
62. Department of Transport 1993 *“National Travel Survey 1989/91”* [Table 10.2]
63. Holman C 1989 *“Air Pollution and Health”* Friends of the Earth
64. Department of Transport 1996 *“Road Accidents Great Britain”*
65. Hamer M 8 November 1997 *“Mean Streets: children from the poorest parts of town are being mown down”* New Scientist
66. Hillman M pers. comm.

67. Department of the Environment, Transport and the Regions 1997 *"What role for trunk roads in England?"* Vol 1 [28]
68. Department of Transport 1994 "Transport Report 1994: the Government's Expenditure Plans 1994-5 to 1996-7" [4.4.2.1] This says that for every pound spent on major road projects an accident saving of 42 pence is obtained.
69. Friends of the Earth 1987 *"Friends of the Earth's response to the Interdepartmental Review of Road Safety"*
70. Department of the Environment, Transport and the Regions 1997 *"What role for trunk roads in England?"* Vol 1 [30]
71. Department of the Environment, Transport and the Regions 1997 *"What role for trunk roads in England?"* Vol 1 [31]
72. Vanke J 1989 *"The effect of major roads upon the local economy: a study of industrial location and its effects"* University of Aston in Birmingham
73. McLaren D 1991 *"Annotated proof of evidence to the Bristol Spine Road public inquiry"* Friends of the Earth
74. Department of the Environment, Transport and the Regions 1997 *"What role for trunk roads in England?"* Vol 1 [33]
75. See for example:
 Secrett C and Cliff Hodges V 1986 *"Motorway madness: roads and their impact on the natural environment"* Friends of the Earth
 Mathew D 1987 *"Capital Schemes: the Department of Transport and road schemes in London"* Friends of the Earth
 McKinnon J 1987 *"Back to the Future: Friends of the Earth's response to the London Assessment Studies"* Friends of the Earth
 Mathew D 1988 *"Roads for the Future: a submission to the House of Commons' Select Committee for Transport inquiry"* Friends of the Earth
 Friends of the Earth 1990 *"Transport and the Environment: a response to the White Paper"* in association with CPRE, the Environment Council, Greenpeace, the Ramblers' Association, RSNC, Transport 2000, WWF and the YHA.
 Friends of the Earth 1991 *"The Roads Programme and Traffic Forecasts"*
 Friends of the Earth 1992 *"Roads round London: the M25 and the Home Counties Orbital"*
 Garland R 1994 *"Roads to Ruin: Friends of the Earth's response to the roads review in England"* Friends of the Earth
 Higman R 1995 *"Fighting Road Schemes"* Friends of the Earth
 South Coast Against Road-building 1996 *"Travelling Light: alternatives to the south coast superhighway"* SCAR/Friends of the Earth/Alarm UK/Railway Development Society
76. Department of the Environment, Transport and the Regions 1997 *"What role for trunk roads in England?"* Vol 1 [34]
77. Festing S 1997 *"Better than Bypasses: how a new approach to transport planning could solve local traffic problems better than road-building"* Friends of the Earth
78. The President of the United States 1939 *"Toll roads and free roads"* A message from the President of the United States transmitting a letter from the Secretary of Agriculture, concurred by the Secretary of War, enclosing a report of the Bureau of Public Roads, United States Department of Agriculture, on the feasibility of a system of transcontinental toll roads and a master plan for free highway development.
79. Department of the Environment, Transport and the Regions 1997 *"What role for trunk roads in England?"* Vol 1 [12]
80. Department of the Environment, Transport and the Regions 1997 *"What role for trunk roads in England?"* Vol 1 [9]
81. Department of the Environment, Transport and the Regions 1997 *"What role for trunk roads in England?"* Vol 1 [10]
82. Standing Advisory Committee on Trunk Road Assessment 1994 *"Trunk Roads and the Generation of Traffic"*