

## Written evidence submitted by Transport Action Network (SRI0059)

### Conclusions

- The tension between the certainty and stability of RISs and uncertainty in future transport policy and the wider world has reached breaking point. It is preventing openness and honesty needed to navigate rapidly changing times.
- Governance processes are ineffective and narrowly focused on cost and delivery, not wider effectiveness, and on the road sector, rather than wider stakeholders. National Highways is able to provide inaccurate data without effective challenge.
- Far from being unexpected, challenge has been brewing from a decade of cover up of the roads programme's environmental and social impacts and promises for bold action turning out to be empty.
- The lack of strategic fit between the roads programme and wider government policy has led to delays and will lead to a further collapse in value for money for the Exchequer.
- DfT is now predicting a huge increase in congestion, unless there is a radical change in policy. The worst impact of the RIS is not the wasting of billions of pounds but giving false hope that we can build our way out of congestion, enabling ministers to put off difficult decisions about effective alternatives.
- The designation of revised roads policy and decisions on smart motorways towards the end of RIS2 pose major risks for RIS3 proceeding in a timely manner. This provides an opportunity to do things differently for the enhancements' budget.

### Recommendations

1. **Pause decision-making on RIS3** until the late-running revision of national road and rail policy is finalised.

2. Follow rail's lead by **removing enhancements** from the RIS process, in recognition that major schemes do not neatly fit into five year funding periods.
3. Create a **new multi-modal enhancements fund** across highways, rail, mass transit and active travel, available to national and sub-national bodies, backed up in time by amending the Infrastructure Act 2015.
4. Parallel to this, RIS should transition to providing **stable funding and standards for maintenance of local roads**, not just the Strategic Road Network (SRN), giving certainty for the supply chain, particularly SMEs, and all road users.
5. Change the **Performance Specification** for RIS3 substantially, so that it aligns with government priorities and resets expectations of schemes. In particular, including the user carbon metric first promised in 2014, and aligning with the targets and missions of Environment Act 2022 and Levelling-up and Regeneration Bill.
6. **Mainstream demand management into RIS3**, not just to cut congestion and carbon but also to widen transport choice, particularly for hard pressed households. This is essential before the inevitable introduction of road pricing. England has much to learn from Wales, Scotland, Northern Ireland and further afield.
7. **Radically reform the failed model of roads governance**, including:  
replacing the Office for Rail and Road (ORR) with an Office for Mobility;  
requiring greater transparency of decision-making and data, and  
considering breaking up National Highways gradually, such as through devolving its funding and role to two trailblazing regional highways areas in RIS3.

## **Introduction**

1. Transport Action Network (TAN) is a non-governmental organisation supporting local communities across England and Wales to improve sustainable travel and stop damaging road building and car-based developments. Having first asked the Department for Transport (DfT) to rethink RIS2 and its roads policy in March 2020, and seen the failure to do so causing ever increasing problems, we are delighted by this inquiry's focus. This response is based upon our unique combination of local reach and national expertise, including multiple legal challenges and input into the Infrastructure Act 2015, which created what is now National Highways (NH).

## **Responses to questions posed**

- 1. How effectively the RIS2 enhancements portfolio has been managed to date;**
2. Even before RIS2 was set in late March 2020, major challenges were obvious. TAN wrote to ministers, calling on them to pause the process to enable time for a rethink<sup>1</sup>. TAN wrote again in February 2022<sup>2</sup> noting that the 24% budget reduction in RIS2 enhancements, the pausing of smart motorways, prospect of major construction inflation and significant policy changes should each be enough to invoke the change control mechanism in NH's licence, let alone all the factors considered together. Yet when DfT eventually responded, it refused to reopen RIS2, effectively signalling that this important governance process will never be used.
3. There are three principal areas of risk: programme management, strategic fit and effectiveness. External scrutiny so far has focused on the former, specifically NH's ability to manage a far greater and more complex portfolio but not the role of DfT as client. There has been minimal scrutiny on external facing elements. Assurance by the Infrastructure and Projects Authority (IPA) and ORR has been siloed and inward looking, such as NH staffing levels and capability, rather than considering interaction of the

portfolio with a radically changing external environment and government priorities.

4. TAN set out its serious concerns regarding ORR's role in a consultation response<sup>3</sup>: put simply ORR is focusing on deliverability, rather than overall effectiveness of roads spending. TAN believes this fails to consider value for the Exchequer as a whole, regarding wider government policy.
  5. One important example is decarbonisation: the Climate Change Committee recommended that "[d]ecisions on investment in roads should be contingent on analysis justifying how they contribute to the UK's pathway to Net Zero"<sup>4</sup>. There is a long history here: the 2013 roads reform programme promised "an aggressive policy of decarbonisation"<sup>5</sup>, then in 2014 RIS1 committed to develop a user carbon metric (covering all emissions from driving on the SRN) by 2020. That commitment was quietly dropped around the same time that DfT's chief analyst included net zero in a list of "unexpected events have occurred that could have a significant impact"<sup>6</sup>. In a number of judicial reviews brought by TAN, DfT then did all it could to avoid assessing the climate impact of its full roads programme in court or to Parliament. While the CCC has raised concerns that DfT "policies to reduce or reverse traffic growth are underdeveloped", it is TAN's view that policies to tackle climate, air quality and other serious impacts have been actively suppressed in order to protect the roads programme.
  6. There is a fundamental tension between the acknowledgement of "significant uncertainty in long term travel demand" in official predictions, with "the desirability of maintaining certainty and stability" in RISs contained in legislation<sup>7</sup>. Problems will only increase unless this contradiction is first acknowledged then resolved.
- 2. Whether risks to the enhancements portfolio for the remainder of the RIS2 period are being well managed;**
7. DfT, ORR and IPA appear to be overly reliant on NH being honest and transparent about progress, updated costs and value for money. There are similar issues across infrastructure regulation, though the failings in the

transport sector have been far less in the public eye than the energy<sup>8</sup> and water sectors.

8. In terms of delivery, the major risks are cost pressures and consenting.
9. Regarding the former, it would be charitable to describe NH's attitude as "head in the sand", as costs and impacts are still being actively misrepresented and information withheld. The processes and bodies that are meant to oversee costs are opaque at best and unaccountable at worst. Minutes and audits are not being made public by various bodies such as the DfT's Investment, Portfolio and Delivery Committee (IPDC) and the Infrastructure and Projects Authority (IPA). There does not seem to be a process to independently verify data submitted to them by NH, which is essential to be able to come to a rational and reasoned conclusion about a project. This is demonstrated by the fact that Accounting Officer Assessments for all six of the Tier 1 RIS2 schemes in the Government's Major Projects Portfolio (GMPP) contain outdated and inflated BCRs<sup>9</sup>.
10. In terms of consenting, there are two key risks around process and policy. The A66 Trans-Pennine scheme is the pilot for "Project Speed", an initiative designed to speed up consenting processes. After rushing consultations, NH is now seeking 32 changes to the development consent order (DCO) halfway through examination. It now appears the scheme was simply not ready to proceed and the DCO application may have to be withdrawn, or at the very least the examination extended beyond statutory limits<sup>10</sup>. In addition, there is a disturbing wider trend with NH attempting to shift key environmental elements out of the formal consenting process, so as to reduce both weight and oversight in decision-making, increasing the risk of legal challenge later. In particular, NH is now seeking to include mitigation in the A66 Environmental Management Plan (EMP), rather than as requirements within the DCO that is signed off by the Secretary of State.
11. The biggest challenge is the much-delayed review of the National Policy Statement (NPS) on National Networks, supposedly finalised by spring 2023 but with the statutory process not even starting yet. DfT's assertion in oral evidence (Q39) that a draft NPS would have no weight in planning processes is somewhat bold, all the more with it supposed to reflect very

significant post-2014 changes in government policy and legislation that the current NPS, designated nearly a decade ago, does not. This is another example of senior officials seemingly sleep-walking into legal quicksand.

- 3. What the impacts of delays and cost overruns are on the overall programme, and whether the revised programme can be delivered to schedule and on budget;**
12. The reduction in value for money will be even more significant than the delays and cost overruns. While the recent reduction in BCRs is the most visible part, the programme's lack of strategic fit with current government priorities is under the water line and the biggest threat to the titanic of a roads programme. As the latest Treasury guidance explains—suitably using the example of a sustainable travel package replacing a road scheme, which breached environment objectives—schemes that do not meet objectives should be struck out at an early stage<sup>11</sup>.
  13. As noted in our previous answer, attempts to speed up consenting of the A66 could backfire. Accelerating the A66 will help fill a drop in spend profile caused by delays to other schemes. It is now facing delays itself and at greater risk of legal challenge. While cost inflation of other schemes may help reduce that gap, this would entail an even greater drop in delivery and value for money of the programme.
  14. There are a number of examples of Designated Funds, which were intended to undo historic harm across the SRN, being used to pay for mitigation of major enhancements, effectively subsidising them. Because of a lack of a real environment strategy (the existing one is a mere four pages long<sup>12</sup>) or effective governance of these funds, it is difficult to monitor what is happening
  15. Concerns grow that NH's estimated scheme costs are neither reliable nor credible. For instance, despite NH committing to significant land acquisition and offsetting the 6.6 MtCO<sub>2</sub>e that would be emitted by the Lower Thames Crossing, the latest estimated scheme cost has not substantially increased since 2020, prior to these latest additions. The fundamental issue is that as the programme faces ever greater internal and external challenges, NH and

DfT are attempting to deflect scrutiny, hindering the transparency and tough decisions that are urgently required.

16. One consequence of pausing smart motorways until five year data is available in 2025 is that this introduces major uncertainty into planning for RIS3. It may be that two versions of RIS3 need to be developed in parallel, one with, the other without smart motorways. If smart motorways do proceed, that would introduce a further cost pressure for RIS3, all the more as both construction inflation and the cost of extra safety will need to be added to previous budgets. If the smart motorways are cancelled, then that will leave a major gap on key sections of the SRN.

#### **4. What progress is being made on planning for the next Road Investment Strategy;**

17. The foundation of RIS planning is future transport policy. The NPS, which is supposed to set this out, should have been revised in 2019, five years after designation and when net zero was legislated, but remains delayed. Confidential ministerial briefings obtained by TAN as part of previous litigation revealed the degree of disarray within the DfT as it sought to square the circle of the largest ever roads programme with world leading climate targets. As The Economist put it, “a critical reason for the slowness in building infrastructure is not the planning system. It is the fact that British ministers have been unable to specify what they want”<sup>13</sup>.
18. The biggest issue is the future of road taxation. Over a year after the Committee’s call for an “honest conversation”, the Government has failed to respond. Worse still, despite the Treasury’s Net Zero Review, the new National Road Traffic Projections 2022 assume the cost of driving falls by 30% (3.15). Only the “mode-balanced decarbonisation scenario” keeps the cost the same. There is projected to be a 12% and 72% increase in traffic on motorways between 2025 and 2060 (4.55), though the failure to reduce emissions shown in figure 42 suggests that none of the scenarios will enable 2030 or 2035 climate targets to be met. Traffic growth at the lower of these levels, let alone traffic reduction, would decimate the business cases for all schemes.

19. The draft Strategic Business Plan for RIS2 suggested RIS3 funding rise to around £33 billion in 2019 prices. If the £3bn cut from RIS2 is rolled over, that would mean over £40bn for road period 3 (2025-2030) in current money, at a time when sustainable travel and local road maintenance are starved of funding. The opportunity of the Spring Budget should be taken to outline a sensible reallocation of funding.
20. Moreover, we are now at the stage where progressing RIS3 further, before the NPS review is complete, would be putting the cart before the horse. A key requirement should be an Appraisal of Sustainability<sup>14</sup> of the roads programme, not simply high-level NPS policies<sup>15</sup>, nor just an assessment of newly added schemes, which meant that 95% of RIS2 was not assessed. This is important to inform strategic plans<sup>16</sup>, which NH was required to produce on issues such as safety and the environment, but which it has failed to. These should be providing a key part of the analysis to develop the next Performance Specification, from which schemes can be prioritised depending on the degree they meet KPIs, rather than simply because they were put in a list by someone at some point in the past. By contrast, RIS2 schemes should not simply be carried forward into RIS3, something the DfT's policy paper on RIS3<sup>17</sup> said would happen but funding pressures now make unlikely.
21. Finally route strategies should be an important link between local needs, wider government priorities and RISs. The first and second attempts at these were poor, and the failure to produce strategic plans gives us concern that the latest versions will be no different.

**5. What lessons from RIS2 need to be incorporated into RIS3 to ensure it is achievable and delivers on policy objectives;**

22. The biggest lesson is a cultural one. There is now a vicious circle where the more schemes lose their way, officials clamp down on discussions and data. In the context of an ever more complex and uncertain world, the IPA highlights the importance of an open project culture and integrating schemes with wider needs. This requires honest conversations, sharing data and engaging with a wider range of stakeholders. Instead, our sources suggest the DfT seems ever more concerned that emissions data will give



fire power to legal challenges rather than actually being prepared to use new data to reappraise schemes and reprioritise its programmes.

23. As RIS2 comes under greater pressure, DfT and NH are withholding information. TAN assisted Prof Marsden in his appeal against the DfT's refusal to disclose the figures behind its Transport Decarbonisation Plan (TDP)<sup>18</sup>, which the ICO ruled there was "a very strong public interest in publication of"<sup>19</sup>. How can it be right that local authorities are forced to sign non-disclosure agreements with NH in order to see traffic data and then only for their area, being precluded from discussing with their neighbours?
  24. Basing work on RIS3 on current rather than outdated policy is critical, as is fundamental reform of governance processes, in particular engaging a wider range of stakeholders and professions outside the roads silo. Abandoning the purported "stability and certainty" of the enhancements pipeline is essential: in an era of unprecedented change, this fiction is making it hard for the programme to flex as society and business needs change. Related to this is a need to genuinely look at all the options, in turn requiring a multi-modal rather than roads-specific enhancement budget. The combination of the change required for culture, programme and processes are such that it is right to ask whether National Highways retaining responsibility is the right way forward or if there could be a better alternative.
- 6. Whether the Government's current and forthcoming roads investment programme is meeting the current and future needs of consumers and business;**
25. The National Road Traffic Predictions<sup>20</sup> set out different future scenarios, centred around current policy. The core scenario predicts a 27% increase in traffic and a 150% increase in motorway congestion by 2060, though by not including the full impact of cheaper motoring from more electric vehicles, is an underestimate. Even if the roads programme were doubled, it would still be entirely inadequate to deal with this issue, which is particularly acute for freight. The real danger here is not that more money will be wasted trying to build our way out of congestion. Rather than ministers use

the unrealistic promises of the roads programme to keep on putting off difficult decisions that would address congestion as opposed to stoke it.

26. According to a 2018 DfT study of public attitudes, “building more or even widening roads was generally not seen to be a viable long term solution” with people unwilling “to face the...disruption caused by work to widen roads” and believing “improvements would have little lasting impact on congestion anyway”.<sup>21</sup> This is in line with research by Transport Focus, which found that “[a]lmost two thirds (65 per cent) of car/van drivers placed more importance on the maintenance of existing roads than building new roads or adding lanes to existing ones.”<sup>22</sup>
27. Regarding the draft objectives for RIS3, safety remains a major challenge, indeed the drop in traffic from the pandemic conceals a lack of progress. Already an issue previously, the understandable controversy about smart motorways has led to even less focus on the most dangerous parts of SRN, the trunk road network. Vision Zero will simply be unachievable by 2040 if NH does not rapidly deliver improvements and high quality alternative routes for active travel and agricultural traffic.
28. Environmental objectives are an even greater challenge. NH is already failing on its biodiversity target but the nature recovery target for 2030 is set to require greater efforts still. There is much more flexibility for biodiversity net gain than for species, which require alternative replacement habitats of the right type and of suitable quality in advance of loss of existing ones. NH has a long record of committing to develop environmental metrics, then quietly abandoning them saying they are “too difficult”. It has done this regarding commitments to develop user carbon and natural capital targets. Too difficult in the sense of calling its enhancements into doubt, most likely.
29. With ever more climate records being set and rapidly broken, planning for the future is likely to require a shift in funding from the SRN to local roads to cope with climate extremes, especially as the latter are often older. Regarding the growing economy and technology objectives, we cover these issues in the previous and next answers.

**7. Whether the Government's roads investment programme aligns with other policy priorities, such as decarbonisation, levelling up, productivity and growth;**

30. The rhetoric in the TDP and RIS2 justifying high investment in roads for decarbonisation is at best deeply disingenuous. Yes, investment in highway renewals and maintenance will inevitably be required, though a future with traffic reduction as opposed to ever more growth will require less overall. Justifying road-building to reduce congestion is deceptive when we have a century of evidence that it does not. The TDP acknowledges we need modal shift and higher occupancy to reduce emissions: at risk of stating the obvious, road-building does the opposite.
31. Besides the substantial, and TAN submits, deliberate ambiguity in the TDP about modal shift, it fails to deliver the radical reductions in emissions required this decade. Analysis for the Scottish government, which adopted a target of a 20% cut in traffic by 2030 to help reduce emissions by 56% by then, makes its shortcomings clearer<sup>23</sup>. It found that the TDP scenarios deliver between a 5% and 40% reduction in transport emissions between 1990 and 2030, with a central scenario at 20%. With 10% of UK CO<sub>2</sub> emissions coming from use of England's Strategic Road Network, it is clear that very significant change is required very soon.
32. In sharp contrast, NH's Net Zero Highways plan ignores these, simply relying on DfT policies for these user emissions to be close to zero by 2050. It claims there is only potential for 2% modal shift by 2050, despite the Climate Change Committee assessing there being potential to cut traffic by 36%<sup>24</sup>. The plan is like an airport climate plan that ignores emissions from the planes that use it. Even regarding NH's own supply chain emissions, at its launch in 2021 the plan promised net zero roads but a more recent materials roadmap is rather more realistic about the limited potential to decarbonise key materials such as concrete<sup>25</sup>.
33. The strategic fit of RIS2 with levelling up is as poor as it is with decarbonisation. Although the fact that 80% of spend is focused on the south has been picked up, the lack of integration with the levelling up missions has not yet been<sup>26</sup>. Mission 1 on pay and productivity, with a

globally competitive city in each region, requires a massive increase in public transport coverage and quality, as does mission 3 about bringing the rest of the country closer to London standards. Investment in bus lanes and public transport interchanges are what would help here but they are missing from RIS2. Mission 7 on healthy lives requires far better active travel conditions: the SRN is often a barrier to active travel but NH schemes do little to help, requiring people on foot or cycles to wait for as many as seven different signals to cross a junction. There is no sign of any linkage between NH and DfT's objective to deliver a world class cycling network by 2040.

34. Finally mission 9 relates to satisfaction with town centres and pride in place: a meta-analysis of road schemes found where they had any economic impacts they were typically new development in out-of-town locations<sup>27</sup>, in other words damaging town centres. The Building Better, Building Beautiful Commission points us in a similar direction, saying "Everyone has told us we have to seriously tackle car dominance when designing places"<sup>28</sup>.
  35. In terms of productivity, as set out above, RIS2 sets the country towards ever greater congestion. The Eddington Transport Study compared road pricing with road-building, finding that if the former was introduced, most road-building would no longer be needed and that the benefits for GDP and total welfare were far greater from road pricing<sup>29</sup>. If we are serious about productivity, this is the way to go, with funding raised invested in widening travel choices for people and freight.
- 8. How RIS3 should take account of technological developments, and evidence on ways of increasing capacity on the Strategic Road Network (such as smart motorways and potential alternatives to them).**
36. The main technology focus of NH has been dot matrix gantries, about as smart as the first mobile phone that only offered text messaging. As its struggles implementing stopped vehicle detection (SVD) have shown, this bureaucratic behemoth lacks the culture and agility to do technology well. The more fundamental issue is not technology but the degree of societal change and acceptance or new business models it leads to, all of which

create major uncertainty. NH assumes that its digital roads programme will increase capacity by 1% by 2030, 8% by 2040 and 17% by 2050<sup>30</sup>, figures that seem incredibly precise given these uncertainties. Moreover, others assume that automated vehicles could lead to 20% more traffic, more than negating these best case assumptions. In any event, if local roads with their more complex junctions cannot sustain such capacity increases, these changes may simply shift traffic jams around. The most important way to manage these uncertainties is to abandon the idea of certainty and stability, and seek least regret options.

37. Although DfT has claimed that smart motorways have minimal negative or even positive environmental impacts, by increasing capacity Smart Motorways can result in a significant increase in carbon emissions. The M6 Junction 21a-26 scheme (which was not paused, despite being less than 50% complete), is the second largest carbon emitting scheme in RIS2, increasing carbon emissions by over 4MtCO<sub>2</sub>e due to the increased traffic over its lifetime<sup>31</sup>.
38. Devolved administrations have good lessons for England to learn from. Scotland and Northern Ireland are rolling out Actively Managed Hard Shoulders. This involves repurposing hard shoulders as bus lanes when there is congestion<sup>32</sup>. Crucially, these schemes manage safety risks by setting a lower speed limit for the hard shoulder and maintaining access by emergency services, while delivering modal shift through faster, more reliable and public transport that is cheaper to operate. Such schemes are long overdue in England. The low cost of these schemes means they could be managed via enlarged budget for Designated Funds in RIS3, rather than Enhancements. The remaining motorways with less regular congestion would benefit from upgrades to controlled motorways, to improve safety and reduce carbon emissions and noise and air pollution from high speeds.
39. The benefits of Influencing Travel Behaviour schemes (also known as smarter choices) have been deliberately ignored by DfT, NH and its predecessors. Despite the 2011 Local Transport White Paper highlighting how this Highways Agency programme delivered BCRs as high as 13:1, their funding had already been pulled<sup>33</sup>. Motorway operators in France have

rolled out car sharing interchanges, enabling rural residents to lift share for the final leg of their commute into congested conurbations, while Germany is accelerating electric roads for clean freight. These are the sorts of schemes that would have excellent strategic fit and even higher BCRs, in other words they are what a reset RIS3 should focus on.

February 2023

## Endnotes

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- <sup>1</sup> [Letter to Secretary of State for Transport to delay setting RIS2](#) (TAN, 4 March 2020)
  - <sup>2</sup> [Letter to SoSfT calling for RIS2 to be reopened](#) (TAN, February 2022)
  - <sup>3</sup> [Response to ORR RIS3 consultation](#) (TAN, 2022)
  - <sup>4</sup> [2021 Progress Report to Parliament](#) (CCC, 2021)
  - <sup>5</sup> [Action for roads: a network for the 21st century](#) (DfT, 2013)
  - <sup>6</sup> [Appraisal and Modelling Strategy](#) (DfT, 2020)
  - <sup>7</sup> Schedule 2, Infrastructure Act 2015 <https://www.legislation.gov.uk/ukpga/2015/7/schedule/2/enacted>
  - <sup>8</sup> See, for instance: [Shapps slams Ofgem for being in thrall to energy firms](#) (City AM, 6 February 2023)
  - <sup>9</sup> See [Letter: Accounting Officer Assessments for major road schemes](#) (TAN, 18 January 2023)
  - <sup>10</sup> [Not so fast! PINS pans plans to change A66 bid](#) (Highways, 9 January, 2023)
  - <sup>11</sup> [Green Book Supplementary Guidance: Value for Money](#) (HMT, 2022)
  - <sup>12</sup> [Highways England Environment Strategy](#) (2017)
  - <sup>13</sup> [The real reason it takes so long to build infrastructure in Britain](#) (The Economist, November 2022)
  - <sup>14</sup> This includes Strategic Environmental Assessment but also the other two strands of sustainability, so providing an important opportunity to deliver other government priorities, such as levelling up.
  - <sup>15</sup> [TAN consultation response to National Network NPS AoS scoping report](#) (TAN, May 2022)
  - <sup>16</sup> See commitments in [Highways England: Licence](#) (DfT, 2015).
  - <sup>17</sup> [Planning ahead for the Strategic Road Network: Developing the third Road Investment Strategy](#) (DfT, December 2021)
  - <sup>18</sup> [UK government blocks release of CO2 figures behind transport plan](#) (The Guardian, 19 December 2022)
  - <sup>19</sup> [Decision notice](#) (ICO, 8 November 2022)
  - <sup>20</sup> [National road traffic projections](#) (DfT, 2022)
  - <sup>21</sup> [Transport and transport technology: public attitudes tracker](#) (DfT, 2018)
  - <sup>22</sup> [Road users' priorities for improvement](#) (Transport Focus, 2021)
  - <sup>23</sup> [Decarbonising the Scottish transport sector](#) (Transport Scotland, 2021)
  - <sup>24</sup> TAN has appealed to the ICO after NH denied holding any information about this discrepancy.
  - <sup>25</sup> [Net zero highways](#) (NH, 2021)
  - <sup>26</sup> [Levelling Up the United Kingdom: missions and metrics Technical Annex](#) (HMSO, 2021)
  - <sup>27</sup> Paragraph 11.3 in [The Impact of Road Projects in England](#) (TfQL, 2017)
  - <sup>28</sup> [Creating space for beauty: interim report of the Building Better, Building Beautiful Commission](#) (MHCLG, 2019)
  - <sup>29</sup> [Eddington Transport Study](#), volume 3 (DfT, 2006)
  - <sup>30</sup> [Net zero highways - Data methods statement](#) (NH, 2022)
  - <sup>31</sup> [M6 J21a-26 Appraisal Summary Table](#), (NH, 27 November 2020)
  - <sup>32</sup> [Consultation on Actively Managed Hard Shoulder and Speed Limit Regulations 2021](#) (Transport Scotland, 2021) and [M1 and M2 Busways - overview | Department for Infrastructure](#) (NI Direct, 2020)
  - <sup>33</sup> Paragraph 7.29 in [Creating growth, cutting carbon: making sustainable local transport happen](#) (DfT, 2011)