



London Cycling Campaign response to the DEFRA Consultation on Designation of National Highways as a "Relevant Public Authority"

May 2022

The London Cycling Campaign welcomes the opportunity to submit evidence to the Consultation on the Designation of National Highways as a "Relevant Public Authority" and we stand ready to provide further information if requested.

About LCC

London Cycling Campaign (LCC) is a charity with more than 20,000 supporters, of whom more than 11,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

Introduction and policy statement

While National Highways is only responsible for a small number of roads in Greater London the substantial traffic travelling to and from those roads into and out of London contributes significantly to the capital's air pollution, carbon emissions and congestion, and impacts negatively on active travel. As we elaborate below, traffic schemes on the Strategic Road Network ultimately impact all of London's roads and the choices Londoners make about their mode of transport.

London's London Cycling Campaign strongly agrees with the proposal to designate National Highways as a "Relevant Public Authority." As the documentation accompanying the consultation states:

"Poor air quality is the greatest environmental risk to public health in the UK. It is known to worsen pre-existing health conditions, such as respiratory and cardio-vascular illnesses, especially for the elderly and infants"

National Highways, which facilitates road transport in the UK, has a leading strategic role managing car trips on the Strategic Road Network (SRN) and, in turn, managing traffic on other roads. **National Highways must partner with local authorities to help meet government targets to achieve better air quality, reduced emissions, fewer car trips and increased active travel.**

As the consultation document notes road transport accounts for 20% of carbon emissions as well as 28% of NOx and 12.5% of PM 2.5 particles (mainly from tyre and brake wear). Thus a switch to electric vehicles will not eliminate the health damage from motor traffic.

We note that the consultation identifies two key measures that National Highways can use to improve air quality: speed reduction and traffic management. While both measures can contribute to improved air quality (AQ) we note the consultation documents state that while traffic management may improve AQ conditions at a specific site it does not necessarily reduce demand:

"Traffic management measures are more effective for an isolated exceedance but less effective on their own to tackle several exceedances in an area. This is because traffic management does not decrease overall traffic demand and the reduction in flow on one road can be offset by an increase in flow elsewhere."

This statement would seem to fly in the face of decades of data and evidence on twin concepts 'induced demand' and 'traffic evaporation', and the underlying decisions people make on how they travel. Even relatively small traffic management measures, changing the capacity or flow of a road or junction, can impact journey times over a broader area – and this leads to people switching to or away from car use.

A new road or faster junction flow for example, can contribute to an overall increase in traffic, because of car journeys becoming faster and therefore more

attractive to car owners. Any increase in car trips will increase air pollution, and emissions.

As a “Relevant Public Authority” National Highways may then face a conflict of interest: reducing journey times for motorists, usually considered a benefit in traffic scheme assessments, will likely encourage more journeys and further reductions in air quality. **To eliminate such conflicts National Highways must be mandated not only to improve air quality by working in partnership with local authorities *but also* to contribute to reduced car use and increased public transport, walking and cycling trips.**

While National Highways traffic schemes may deal primarily with faster roads, which may exclude cycle users and walkers, their junctions also frequently create hazards for cyclists and walkers (often deterring active travel) that must be addressed and eliminated. Access to cycle lanes and tracks alongside, and crossing, SRN roads must be facilitated, as well as connections from SRN roads to public transport and shared-mobility hubs.

Consideration and promotion of active travel needs to be integral to National Highways traffic schemes and the maintenance of SRN roads. All traffic schemes on SRN roads should, by default, include protected or parallel space for cycle users, as they do in the Netherlands. We note that the popularity of e-bikes has made longer cycle journeys more popular and that in the Netherlands inter-urban cycleways are now being built to enable such trips.

The danger of first predicting higher traffic flows and then providing for those increased flows is that increased traffic becomes a self-fulfilling prophecy. Air quality, carbon emissions and public health suffer as a result. Instead, the “predict and provide” approach must be abandoned, and roads must be managed to reduce traffic so as to achieve public policy goals^[AS1].

We note that London’s Mayor, in his Transport Strategy and London Plan (a statutory document), declares a strategic target of increasing public transport, walking and cycling journeys from 63% to 80% by 2041. This requires a reduction of car trips from 37% to 20%. National Highways, as a Relevant Public Authority, has the opportunity to actively contribute to this goal in London, and fulfil national targets beyond as well.

Consultation Questions

Section 1 – Introduction: about you

Q1. Organisation

- London Cycling Campaign

Q2. Contact

- For publication: info@lcc.org.uk For DfT correspondence: tom.bogdanowicz@lcc.org.uk

Q3. Which best describes you?

- Charity or Social Enterprise

Section 2 – Consultation questions

Q5. Do you agree or disagree with the proposal to designate National Highways as a “Relevant Public Authority”?

- Strongly agree

Q6. Would you agree or disagree that designating National Highways as a “Relevant Air Public Authority” would increase the effectiveness of local air quality management?

- Strongly agree

Q7. What do you think of the draft statutory guidance “working with National Highways” (please see Annex A)?

Please set out any comments or suggested improvements you think we should consider.

- See statement above

Q8. Do you agree or disagree with our assessment of impacts set out in the Regulatory Triage Assessment document (please see Annex B)? Please set out your reasons for agreement/disagreement.

- See statement above

Q9. Do you have any further comments or views on the designation of National Highways as a Relevant Public Authority

- See statement above