

**From:** Peter Silverman - Clean Highways

**Date:** Wednesday, 23 January 2019 at 11:52

**To:** Bernadette Kelly - Permanent Secretary DfT

**Cc:** Jesse Norman MP, Richard Coates (ORR), Lilian Greenwood MP - Chair Transport Committee

**Subject:** Draft RIS 2020/25 KPIs not spelt out + litter

Dear Ms Kelly,

I want to share with you my concerns about your Department's [Draft Road Investment Strategy for 2020 – 2025](#) for Highways England.

According to the [Infrastructure Act 2015 S3\(3\)](#) a "Road Investment Strategy must specify the objectives to be achieved by the company ..."

According to HE's licence "**the Draft RIS will include details** of the requirements to be delivered by the Licence holder.. " (6.11) and the "**Highways Monitor will assess the Draft RIS** and provide advice to the Secretary of State" (6.12).

The current RIS (see Part 3 - The Performance Specification) lays down sets of Key Performance Indicators for HE. For example, under Environment there are KPIs for "noise" and "biodiversity" and references to "air quality" and "greenhouse gases" but, as I have previously pointed out, there is no mention of "litter".

The Draft RIS 2020/25 says the "**performance specification is a key part of the RIS**" (page 15) and "We **expect** that the performance specification will be split into six outcome areas outlined in the diagram below (page 16).

The diagram says under "Being environmentally responsible" – "We want to build on the progress made in RIS1 to improve environmental outcomes. For RIS2 we want a wider range of issues to be monitored and also to widen the scope of the outcome area to cover issues relating to public health and impacts on communities".

If the Draft RIS has to include **details** and the **performance specification is a key part of the RIS** why did it not include a fully detailed set of KPIs?

How can the Highways Monitor, the Office of Rail & Road, fully assess the Draft RIS with only vague references to what they might be?

In July 2018 I met with Roads Minister, Jesse Norman MP, to discuss litter on the HE network. He was not aware that there wasn't a KPI for litter in the current RIS. At his request I sent him an extract from it showing this to be the case. In response your department wrote to me on 14<sup>th</sup> July to say that HE, DEFRA and the DfT were developing a robust metric for the RIS. Has this work been completed? If so, can you please provide me with a copy of it?

It is difficult not to conclude that the reason why KPIs were not spelt out in the Draft RIS was to avoid having to say whether or not the DfT intended to introduce one for litter.

In my view one should be introduced as a matter of urgency. As I have pointed out previously it can be done without having to wait for a new RIS period to commence.

To my mind not doing so is further evidence of what I see as a tacit government [policy to dumb down Highways England's statutory duty on litter](#) in order to deflect criticism of their blatant failure to comply with it.

I would welcome your comments.

Kind regards

Peter Silverman

01895 625770

07799 404766

[www.cleanhighways.co.uk](http://www.cleanhighways.co.uk)