

# **Proposals for the creation of a Major Road Network; Transport East consultation response**

The following response to the consultation on the *Proposals for the Creation of a Major Road Network* is submitted on behalf of Transport East, the Sub-National Transport Forum representing the East of England.

The response was discussed and endorsed at the meeting of Transport East that took place on 13<sup>th</sup> March 2018.

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## **MRN core principles**

**Q1.** Transport East agrees with the proposed core principles for the MRN outlined in the consultation document. In particular:

- The MRN must be consistent across England and defined via a set of criteria and centrally agreed, with the final decision on inclusions resting with the Secretary of State;
- Local Authorities will remain responsible for the roads included in the MRN;
- MRN funding needs to bring about improvements in standards and performance across the network, with investments focusing on enhancements or major renewal schemes

## **Defining the Network**

**Q2.** Transport East disagrees with the quantitative criteria and in particular would wish to make the following points:

- The criteria focus solely on traffic flow levels. Transport East would like to see some flexibility to reflect the role and function of specific routes rather than an assessment based solely upon traffic levels;
- There is a need to consider the role and function of roads that are put forward for inclusion in the MRN, particularly those that serve sparsely populated communities in rural areas;
- Planned economic and housing growth issues, including the need to ensure appropriate sustainable transport connectivity, should be considered given the timescales involved in developing major improvements to ensure the MRN evolves in a timely manner that supports and enables growth.
- Transport East welcomes the inclusion of roads in the MRN that were previously part of the trunk road network

**Q3.** Transport East agrees with the quantitative criteria and in particular would wish to make the following points:

- the MRN cannot be defined by quantitative criteria alone as this would fail to recognise local and regional characteristics and would produce a series of fragmented road links across the country;
- The MRN must be consistent and coherent across the country when considered alongside the SRN;

- Major conurbations, airports, ports and other significant economic centres are connected via the MRN.
- It is noted that the proposals include connecting all towns/cities with a population greater than 50,000 and in specific circumstances connecting to economic centres with a population below this threshold.
- Transport East notes that there appear to be some inconsistencies in how this has been applied across the country and shown in the definition of the Indicative Major Road Network, particularly in the rural areas.

**Q4.** For the reasons outlined in the previous questions, Transport East does not agree that the Indicative Major Road Network identifies all sections of road that should be included in the MRN.

Transport East supports and would wish to refer to the specific responses made by the following local transport authorities; Essex County Council, Southend Borough Council, Thurrock Council, Suffolk County Council, Norfolk County Council, Cambridgeshire County Council, Peterborough Council, Hertfordshire County Council.

**Q5.** For the reasons outlined in the previous questions, Transport East believes that the Indicative Major Road Network includes section of road that should not be included in the MRN.

Transport East supports and would wish to refer to the specific responses made by the following local transport authorities; Essex County Council, Southend Borough Council, Thurrock Council, Suffolk County Council, Norfolk County Council, Cambridgeshire County Council, Peterborough Council, Hertfordshire County Council.

**Q6.** Transport East agrees with the proposal for how the MRN should be reviewed in future years. Consideration should be given to assessing programmed new or amended parts of the network based on their modelled traffic flows and other growth related qualitative criteria so that the MRN can be amended as these routes open rather than waiting five years until the next review takes place.

## Investment Planning

**Q7.** Transport East broadly supports the roles outlined for local, regional and national bodies, but would make the following points:

- There is no statutory Sub-National Transport Body in the East of England, although Transport East may develop as a STB at some time in the future.
- Transport East is currently best placed to perform the regional role contained within the proposal and would wish to discuss current and future roles and responsibilities with DfT.
- Transport East will need to be provided with advance funding to develop a Regional Evidence Base;
- Local Authorities will need advance funding to work up potential schemes to Strategic Outline Business Case (SOBC) level as scheme development represents a significant amount of work that cannot be funded from existing budgets;
- There should be a consistent evidence base approach across the MRN Programme;
- Highways England (HE) should be involved;
- initial scheme proposals for investment should be put forward by Local Authorities for inclusion in the Regional Evidence Base;
- Local Authorities should be responsible for the continued development of schemes included in the MRN Investment Programme.

**Q8.** There is no statutory Sub-National Transport Body in the East of England, although Transport East may develop as a STB at some time in the future. Roles and responsibilities will need to evolve as STB structures develop

**Q9.** Transport East agrees with the DfT's proposals for regional groupings to support the investment planning of the MRN in areas where no sub-national transport bodies (STBs) exist; but is concerned that there is a disparity in regional groups across England and that this may disproportionately affect the levels of investment in the MRN in the east of England.

**Q10.** Transport East would wish to stress the importance of improvements to the MRN which support economic and housing growth when developing the regional evidence base.

**Q11.** Transport East recognises:

- Highways England's experience in road investment planning; and
- the need to ensure a seamless transition between the SRN and MRN

While Transport East broadly accepts the role that Highways England could have in the MRN Programme, this appears to focus on advising Government. Transport East believes this should not be independent of or in isolation from Local Highway Authorities who are responsible for the MRN and regional planning. It is also unclear how Highways England will be funded to carry out this role.

While noting the potential role of Highways England in supporting LAs in the delivery of agreed MRN schemes, e.g. advising LAs in designing and developing projects, Transport East is concerned that this may lead to additional bureaucracy and hence costs to local authorities. Bureaucracy and costs should be kept to a minimum.

Transport East would welcome the opportunity for Local Authorities to access the Highways England's supply chain in order to take advantage of economies of scale that may be available.

### **Eligibility & Investment Assessment**

**Q12.** Transport East suggests that DfT should consider a lower threshold where effective schemes can be delivered for less than £20m. The £100m threshold, while understandable, means that the largest schemes would require funding from an alternative source: Transport East also suggests that there should be a degree of flexibility around these thresholds in order to achieve transformational benefits.

Transport East also suggests that the cost thresholds should initially be treated flexibly and be reviewed every five years to coincide with the existing RIS timetable/review of the MRN and in the light of experience in delivering the first tranche of MRN projects.

**Q13.** Transport East agrees with the eligibility criteria and welcomes the inclusion of major structural renewals within the schemes that would be eligible for MRN funding; however, for the avoidance of doubt it should be clear that structural renewals could include carriageway renewals in addition to the renewal of single point assets. The specific inclusion of Variable Message Signs is odd and should be considered as one aspect of "traffic management and the use of smart technology and data".

**Q14.** Transport East agrees with the investment assessment criteria.

**Q15.** No further comment.

## **Other Considerations**

**Q16.** Transport East would wish to make the following additional comments;

Transport East notes that “in the case of successful schemes, the Department’s funding for their delivery would be fixed with the relevant local authority responsible for its effective delivery” and it is proposed “that there should be a requirement for local contributions towards the final cost of the scheme”.

Transport East is concerned that for larger projects which have a longer gestation period, fixing the delivery contribution at an early stage of development (possibly before a Statement of Business Case) will potentially penalise promoting local authorities. SCC suggests that the process for accepting projects into the MRN programme should be flexible and phased to reduce unnecessary development costs and the risk of increased implementation costs to local authorities.

The DfT consultation document states that “Following the launch of the MRN Programme during 2018, we will consider whether there is a need to identify schemes for early entry to the MRN Investment Programme”. Transport East is concerned that:

- the process for identifying schemes for early entry to the MRN Investment Programme is not clear;
- it will take some time to develop a regional evidence base for the east of England; and
- there is a disparity in STBs/regional groups across England which may disproportionately affect the opportunity to include schemes in the east of England.

Transport East suggests that the MRN is defined as a nationally significant network and that schemes promoted on the MRN are eligible to be treated as Nationally Significant Infrastructure Projects (NSIPs). This would be consistent with the Rees Jefferys intention that the MRN embraced the SRN and local authority major roads in a single integrated network independent of ownership.