

Appendix 1

Draft TfSE Response to Consultation on Proposals for the Creation of a Major Road Network

Dear Jesse Norman MP

PROPOSALS FOR THE CREATION OF A MAJOR ROAD NETWORK

I am pleased to respond, as Chair of the Shadow Partnership Board of Transport for the South East, to the Department for Transport's consultation launched on 23 December 2017. The Board appreciates the opportunity to shape this new approach to managing and funding the road network, and to ensure it can meet the priorities for our region.

TfSE welcomes the creation of the Major Road Network (MRN) and the additional investment this will bring to a wide range of the most economically important roads in the South East. Our full response to the consultation exercise is attached at Annex A but I wanted to highlight in this letter our position on a number of key issues. We see as a particular priority the need for full alignment of the investment planning process for the SRN and MRN networks together, if a single coherent system of main roads is to be developed for the benefit of users and the regional economy. Those beneficiaries are rightly central to the objectives set out for the MRN, but we think it important that greater prominence should also be given to environmental and safety imperatives.

On **network definition**, the first of the three main aspects of the consultation, TfSE commissioned Atkins to help build our evidence base and advise on the quantitative and qualitative criteria for defining the MRN in the South East; their report is attached in full at Annex B.

We support the proposal to use quantitative two-tier traffic flow criteria as the starting point for identifying the most economically important local authority roads. However, we challenge the suggestion that this should be augmented by the automatic inclusion of all recently de-trunked roads: many of these roads were removed from the SRN because of the development of new higher standard links, such that they now carry insufficient traffic to pass any nationally consistent threshold.

We agree with the use of qualitative criteria to ensure that a coherent network emerges that recognises regional and local characteristics and works most effectively alongside the SRN. The Atkins work has led us to propose an adjusted structure of three qualitative criteria to complete the definition of the MRN nationally. Our consultation response sets out our approach to the three: Completing Economic Connections; Resilience for the SRN; and Relief for the SRN.

Applying those criteria, we have identified some additions needed to the indicative MRN in the South East put forward by the Department, along with a smaller number of deletions. These are shown on the map in Annex C. We seek to add more miles

than we remove, but believe this is justified by what should be as far as possible a consistent approach across the English regions.

We support a five-year cycle for reviewing the MRN, in a joint exercise with review of the SRN; and are keen that MRN definition takes full account of future growth areas, and recognises the potentially transformational role of major improvement in the region's road network.

On **investment planning**, we are content with the general balance of responsibilities for local highway authorities and STBs, with STBs managing the Regional Evidence Bases that will be used to identify suitable investment schemes. We would expect the Department's investigation of the potential requirements for Regional Evidence Bases to lead to appropriate funding support for the STBs work in preparing them. The cost implications for local highway authorities of preparatory scheme development work also need to be recognised; the approach to the MRN should be aligned with that for the SRN, where funding is allocated within the RIS for scheme development work and strategic studies, a significant proportion of which is revenue funded.

The shared responsibility of the Department and STBs' for updating the Programme and Evidence Bases every two years will need to be adapted to ensure the process remains aligned with the five-year cycle for the MRN and SRN as a whole.

On **eligibility and assessment criteria** we strongly support the inclusion of Packages of Improvements in the types of scheme that will be eligible for funding; we agree that these could play a crucial part in raising the standard of the MRN and in meeting TfSE strategic objectives for the road network in the region. We note the prominence of bypass schemes in the presentation of the MRN concept so far. These would clearly do much to enhance the performance of MRN roads and significantly reduce their local impacts; however, we think it important that they be developed as far as possible as part of a strategy for that MRN corridor as a whole, so that they can contribute most effectively to unlocking growth potential.

We challenge the suggestion that some schemes on the SRN of a 'distinct local sub-national nature' could qualify for MRN funding; it will be important to hold to the principle that all work on the SRN itself is to be funded by Highways England through the RIS.

We note the general presumption against funding public transport improvements, but believe that the exception cited, where such investment forms part of a wider package of interventions, should in practice allow a substantial element of facilitation of bus and coach travel in plans for enhancing the MRN, on both urban and rural stretches.

Finally, we seek assurance that the revenue spending implications of any capital investments schemes will be addressed, through adjustment to existing funding channels for local highway authorities. We very much welcome the guiding principle for the MRN that its creation should in no way adversely affect local highways

maintenance funding. We, and the local highway authorities themselves, will rely on the Department ensuring adherence to this principle.

The creation of the MRN is a welcome recognition of the importance of major local highway authority roads and their key role in providing a seamless service alongside the SRN. We look forward to working closely with the Department as the concept is firmed up and detailed operational arrangements are put in place. We would welcome the opportunity to discuss our response and how the MRN in the South East can best support the needs of the region.

Cllr Keith Glazier

Leader, East Sussex County Council

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Annex A - Response to Consultation Questions

Core Principles

1. Do you agree with the proposed core principles for the MRN outlined in this document?

We fully agree with five of the six proposed *core principles*, although we are concerned about an exclusive focus on enhancement and major renewals, to the detriment of revenue funding for maintenance. From the five *objectives* for the MRN from which these principles are derived, we question the approach taken to Supporting the SRN, but otherwise agree that these will enable the MRN to help deliver the Government's Transport Investment Strategy.

Core principles: We are pleased to see *Increased Certainty of Funding* as the first principle. It will be important to build in safeguards to the bidding process to give some confidence on availability of funding beyond a single five-year period, to maximise the effectiveness of investment planning and efficient use of the supply chain. A *Consistent Network* is also key, but can only refer to consistency of definition, not to consistency of standard or user experience (which we pick up on in our response to Q16). We strongly agree, in respect of *Strengthening Links with the SRN*, that the MRN and SRN investment programmes must be complementary. There must be full alignment of the investment planning process for the two networks if the STBs are to carry out their key function of developing a single coherent system of main roads for the benefit of users and the regional economy.

Improved standards and performance across the MRN depend as much on sufficient revenue funding for traffic management, information provision and day-to-day maintenance as they do on capital enhancements or major renewals. If this cannot be accommodated within the MRN Investment Programme itself, it is essential that existing funding arrangements for local highway authorities are adjusted to channel extra revenue resources to authorities in proportion to the extent of MRN road for which they are responsible, to enable them to meet the higher expectations and maintenance cost that MRN status will generate.

Objectives: *Support the SRN* only needs to be included because Government is progressing the MRN as comprising local roads only, not the broader concept, embracing the SRN too, that was put forward by Rees Jeffreys. This objective might be better formulated as 'provide a single seamless service'. We recognise there is in places a particular need to improve flows between the SRN and MRN, but this should be a priority for Highways England-led investment in the SRN.

We are concerned that the set of five objectives for the MRN gives insufficient prominence to environmental and safety considerations. Safety must be a key element of the 'better journeys' implicit in *Support all Users*; and the environmental imperatives picked up in passing under *Reduce Congestion* may merit being separately highlighted. This broadening of the objectives for the MRN is needed to underpin a more comprehensive set of criteria for investment assessment (see our response to Q14).

Defining the MRN

Transport for the South East commissioned Atkins to advise on the quantitative and qualitative criteria for MRN definition that best meet the needs of the South East region; their report is attached in full at Annex B, and forms the basis for our responses to Q2-6. We set out here TfSE's current agreed view on defining our MRN, but this will need to evolve to take account of the development of the Transport Strategy for the region in due course.

2. To what extent do you agree or disagree with the quantitative criteria outlined and their proposed application?

We agree with the use of the two-tier traffic flow criterion as the starting point for identifying the most economically important local authority roads. We note that Rees Jeffreys investigated as an alternative to traffic flow the use of other metrics that might more accurately reflect the economic importance of the road, such as a possible formula based on the GVA of the hubs at each end and the distance they are apart, although it struggled to find a readily accessible comprehensive dataset on GVA. We therefore agree with the Rees Jeffreys conclusion that AADF itself should be able to act as a simple and effective proxy.

The Consultation Document does not specify what AADF thresholds the Department has used to generate the new indicative MRN; TfSE has come to the view that the specific criteria used by Rees Jeffreys remain appropriate for our needs, but with two modifications:

Fine-tune the threshold test to avoid distortions: using the simple Rees Jeffreys approach means a road with traffic flow only just below 20k AADF, and with HGV and LGV proportions only just below the 5% / 15% thresholds, would not qualify for inclusion; whereas a road only just over 10,000 AADF and just exceeding, say, the 15% threshold would qualify. We propose a scoring system to apply the three tests in a more graduated way, with roads in the 10 to 20k AADF band qualifying for inclusion only if they either fully meet one of the qualifying conditions, or score more than the equivalent of meeting two out of the three¹.

¹ Relevant links with traffic flows of between 10,000 and 20,000 to be identified for inclusion in the MRN using a score calculated as the average of:

- the extent to which AADF exceeds 10k $(AADF - 10,000) / (20,000 - 10,000)$;
- the extent to which the HGV percentage reaches the 5% level $(HGV \text{ percentage} / 5\%)$;
- and
- the extent to which the LGV percentage reaches the 15% level $(LGV \text{ percentage} / 15\%)$

Links scoring more than 0.67 (i.e. the equivalent of fully meeting two of the three criteria) to be included in the indicative MRN network in addition to those passing on one test alone; this therefore allows those links with moderate scores against each criterion to be included, as well as those with a high score against only one criterion.

Use a five-year average of traffic count data: we see some risk in relying on a single year's traffic count as it could be unrepresentative as a result of temporary peaks or troughs in traffic flow, or equipment faults. Any inconsistencies could be smoothed out by using the average of both the latest data available (2016?) and the four preceding years.

We agree with the Department's proposal not to attempt to factor forecast future traffic growth into the AADF data used to determine inclusion in the MRN. Rees Jeffreys' use of varying growth rates to 2040 from the NRTF by region and road type is not specific enough to add value. Atkins have suggested we might derive a shorter-term forecast derived from the Highways England Regional Traffic Model, for the South East, when available. At this stage, however, we concur with the consultation proposal to use 'current' data only. Nonetheless, the qualitative criteria used take account now of designated growth areas (see response to Q3); this should not be left as a consideration only in future reviews of the network. And is essential that the approach to the MRN in each region recognises that investment in it could be transformational, supporting a step change in planned economic and housing growth.

We disagree with the consultation proposal to include all de-trunked roads; the reference in the paper to 'where appropriate' is unclear, but we feel this could only mean where they meet the other criteria - in which case there is no need to make special reference to detrunked roads. We recognise that, across the country, many former trunk roads continue to play a very important regional role, and so are likely to qualify for inclusion on the basis of traffic flow, for example. But a blanket policy to include all roads detrunked between 2001 and 2009 would undermine a consistent national approach to MRN definition, as the pre-2001 trunk road network was biased towards the Midlands and North (particularly after previous rounds of detrunking of e.g. the A4 and A30 in the 1970s). The South East (and South West) had by 2001 a relatively thin network of trunk roads, and still does. We believe the South East has many roads with a stronger claim for MRN status than some detrunked stretches elsewhere in the country². (Nonetheless, this concern applies to one section of proposed MRN in the South East too: the A259 between Brenzett and Folkestone in Kent which was detrunked when replaced by the A2070 and now carries 9,500 AADF or less.)

It should be noted that some anomalies may arise, not just in the South East, because the starting point for MRN definition is limited to the set of 'A' roads across England. Some 'B' roads perform an important function in connecting economic activity and resilience for the SRN: in the South East, this is the case for 5 miles of the B3270 connecting J10 and J11 of the M4 through business parks on the southern edge of Reading, and a short stretch of the B255 from the A2 Bean Interchange in Kent. We are not however proposing these for the MRN at this stage, as the onus should first be on the relevant local highway authority to reclassify the road as 'A'.

² for example, the formerly trunk A167 in County Durham has 2016 AADF of only 3,269 at Chilton.

3. To what extent do you agree or disagree with the qualitative criteria outlined and their application?

Ensuring a Coherent Network is presented as the first of three qualitative criteria, but we see it as more of a methodological requirement than a substantive addition to the set of roads included in the MRN. Adding and removing individual links as proposed is essential to convert the raw output from applying the quantitative criteria into a meaningful set of through routes. (It only becomes a truly coherent network when presented in combination with the SRN.). We agree with the methodology proposed.

The other two qualitative criteria pick up the key substantive elements that need to be added, but they are umbrella terms covering several distinct considerations.

Atkins have aided our understanding of what the two headings should embrace and how they could be applied consistently at the national level by focusing on five available national datasets, in addition to the set of population centres and gateways or transport hubs identified in the proposal.

- employment density (NOMIS data)
- Enterprise Zones and 'Economic Opportunity Areas' (as used by Highways England³)
- proximity of adjacent economic centres (population hubs)
- Agreed Diversion Routes from the SRN
- SRN performance - average speed by link

This leads us to propose an adjusted structure of three qualitative criteria to complete the definition of the MRN nationally:

1: Completing economic connections: additions to the quantitative-derived MRN to ensure that all qualifying economic centres are connected to the combined SRN / MRN. We are content with the approach taken by Rees Jeffreys, based on centres over 50k population and exceptionally 25k. (That lower limit is invoked for the Isle of Wight, to connect Newport (population 25,500) to the MRN, and hence opening up access to the island as a whole, population 140,000.) We propose that these be complemented by identified growth areas, to ensure that the MRN is fit for the coming decade and can help facilitate growth.

But the MRN definition requires clarity on two aspects:

- the level of activity at international gateways and other road freight hubs that justifies them having SRN / MRN access (with all more important gateways having SRN rather than MRN connection). The methodology should specify minimum tonnage or passenger volumes (recognising wherever possible the extent to which this traffic impacts on the road network as opposed to rail).

³ The 'Economic Opportunity Areas' were developed in conjunction with regional stakeholders as part of Highways England's Strategic Economic Growth Plan and are currently under further review.

- whilst the MRN needs to be designated right up to the entrance to the port or airport, it is less clear how far MRN roads should continue into the centres of towns and cities: should they only form part of the network if they then continue as through routes, or should spurs off the MRN consistently also be included in the MRN? We believe that such spurs are only justified exceptionally if they serve major coastal towns or in situations where it is possible to pinpoint the traffic-generating heart of an urban area. Main urban corridors otherwise only belong in the MRN if they form through routes, and hence are able to support criteria (2) and / or (3) below, not just completing economic connections. We set out, in response to Q13 below, how the stretches of urban MRN require special treatment in recognition of the multiple roles they need to perform and the need to maximise space-efficient modes⁴.

2: Resilience for the SRN: The SRN is the most important transport infrastructure supporting England's economy, but sections consistently provide a poor service through overloading. This particularly applies to the South East, where the length of SRN is unusually small in relation to population and economic activity (see response to Q4), and where the concentration of international gateways serving the whole country places exceptional pressures on the region's SRN. The MRN must be able to work seamlessly in conjunction with the SRN such that the two together most effectively meet the needs of business. This may mean designating as MRN some additional major roads running parallel to the busiest SRN stretches, where those local roads are capable, with some investment in extra capacity, of backing up the SRN road which is approaching the limits of deliverable extra capacity. We suggest however that local roads parallel to the SRN that run through sensitive urban or rural environments should not be included unless the SRN stretch in question is even less suited for expansion, and unless MRN investment can bring environmental benefits.

This resilience criterion should not in our view entail including in the MRN the full set of Agreed Diversion Routes for the SRN: these perform a specific role, in the case of incidents and roadworks only, of carrying traffic from one SRN junction to the next. Improvements needed to these roads should be covered, as currently envisaged in the RIS, from SRN funding and not as part of the new MRN programme.

3: Relief for the SRN: The MRN should also complement the SRN in a broader sense, ensuring it provides additional connectivity further away from the SRN itself that amongst other things takes pressure off the SRN. MRN designation should not just aim to hook all qualifying economic centres up to an SRN core, but should also embrace direct connections between economic centres that might currently be marginal in MRN terms on traffic grounds. Maximum value can be gained from the MRN programme when it opens up more direct options for journeys from A to B which currently have no realistic choice but to take a longer route via overloaded stretches of the SRN, such as the M25. And of course many of the links to be included on the grounds of relief to the SRN will also directly support economic connections (qualitative criterion 1), particularly to growth areas.

⁴ Urban MRN roads should be carrying a higher proportion of bus/coach movement than elsewhere. It could in theory make sense to allow a lower overall AADF threshold for such roads, in conjunction with introducing a minimum proportion for Public Service Vehicle traffic. However, we reject this approach as the focus should be on the potential for modal shift to public transport, rather than having achieved it already.

We have considered whether there is a case for a *fourth qualitative consideration*, in the form of a commitment not to designate as MRN any road that runs through environmentally sensitive areas. Atkins have mapped all parts of the TfSE region that are protected as National Park, AONBs or Ramsar sites, some of which is already crossed by SRN roads (see Fig 6-1, in the Atkins report in Annex B). Where there is a good case for an MRN connection impinging on a protected landscape, extra investment arising could be directed not at increasing capacity but, through a package approach, at improving the standard of local environmental mitigation and preventing rat-running on less suitable local roads that cut further into the protected area. For that reason, we are not seeking to rule out MRN designation in these areas.

4. Have both the quantitative and qualitative criteria proposed in the consultation document identified all sections of road you feel should be included in the MRN?

No. Applying the modified criteria set out above, Transport for the South East has identified some additions needed to the indicative MRN for its region, and some deletions. We seek to add more miles than we remove, but we believe this is justified by what should be as far as possible a consistent approach across the English regions. We note that the total length of the indicative MRN proposed by DfT is some 5,000 miles⁵, around 19% longer than the 4,200 miles of SRN. Our proposed MRN in the South East amounts to 930 miles, around 34% longer than the 695 miles of SRN in our region. We believe there is a strong case for a disproportionately large MRN in the South East: with 67 miles of SRN per million population, 15% below the English average, the SE SRN is unusually sparse; and it is significantly more heavily trafficked (SE motorways carry 10% more traffic per mile than the national average, and dual carriageways here are nearly 40% busier).

We seek a net addition of 350 miles of road to the 580 mile long indicative MRN in the South East. Some minor adjustments arise from application of the modified quantitative criteria we propose, but the list of additions is mainly generated by the richer approach to qualitative criteria. In total, 106 miles of this increase provides direct additional resilience to overstretched parallel SRN roads. Many of these additions, and also of those put forward for reasons of connectivity and relief to the SRN, already meet the quantitative traffic criteria; we are simply seeking restoration to the MRN of links in heavily trafficked suburban areas of Berkshire, Surrey and Kent which Rees Jeffreys had removed (and DfT have provisionally confirmed) when aiming for a more spatially balanced network.

5. Have the quantitative or qualitative criteria proposed in the consultation identified sections of road you feel should not be included in the MRN?

Yes. As noted above, the blanket inclusion of detrunked roads has led to inappropriate inclusions across the country, including, as noted, the easternmost stretch of the A259 in Kent

⁵ We assume that this national length (as noted in the 19 December DfT press notice) is the 'appropriate' size referred to on p22 of the Consultation Document, being small enough for 'an improvement in performance to be achievable across its entirety' (p20).

6. Do you agree with the proposal for how the MRN should be reviewed in future years?

Yes. We agree with the recognition that a balance needs to be struck between stability of the MRN - for planning, operation, and public perception - and maintaining relevance to the country's needs. The five-year cycle, reviewing the MRN, in a joint exercise with the SRN, is appropriate; with perhaps the expectation that more fundamental challenge of the extent of both networks is only carried out in preparation for alternate Road Periods, every ten years.

Investment planning

7. To what extent do you agree or disagree with the roles outlined for local, regional and national bodies?

8. What additional responsibilities, if any, should be included? Please state at which level these roles should be allocated.

We are content with the general balance of responsibilities across the different levels, and welcome the focus on a programme of investment proposals from the STB. Greater clarity will be needed about the Department's role in assessing and prioritising the Regional Evidence Bases, and we seek assurance that this would not simply entail ranking one region's submission over another's. We comment in response to Q11 on the proposed role for Highways England.

We agree that the STBs are best-placed to take on the important strategic role for the MRN as proposed. Each STB should have full responsibility for the development of its Regional Evidence Base, subject only to guidance from the Department, but working closely with local highway authorities and LEPs and taking account of their Strategic Economic Plans. We welcome the recognition in this consultation of the additional work that this will entail for regions; we would expect the Department's investigation of the potential requirements here to lead to appropriate funding support for the STBs for Regional Evidence Base preparation. The cost implications for LHAs of preparatory work also need to be recognised; the approach to the MRN should be aligned with that for the SRN, where funding is allocated within the RIS for scheme development work and strategic studies.

The shared Department and STBs' responsibility for updating the Programme and Evidence Bases every two years should be adapted to ensure the process remains aligned with the five-year cycle for the MRN and SRN as a whole; we suggest that the interim review takes place only in years 2 and 4 of each Road Period.

The STBs will want to work in partnership with Government on longer-term planning for the National Road Fund, having a say on the approach to future funding and distribution between the SRN and the MRN. A pipeline of schemes will be most effectively built up if there is visibility of likely funding levels for the MRN running into the next five-year planning period.

We welcome the proposed flexibility for regions to design and manage the process of submitting for consideration by the Department schemes which are supported by the local authority and relevant LEP. There also needs to be ongoing flexibility over the region's programme of schemes so that spend can be managed effectively; this has worked well with the Local Growth Fund.

It will often be more appropriate for the STB, rather than an individual local authority, to take the lead in identifying and prioritising investment proposals, particularly where the road affected crosses an LHA border and so is the responsibility of multiple authorities. Whilst the South East has no Combined Authority areas, the Thames Valley area is characterised by smaller highway authorities and TfSE leadership may be particularly appropriate for schemes there. LHAs nonetheless have a central role in identifying the need for enhancements to the MRN, ensuring local dialogue feeds in expertise about the most effective solutions, for example in the last mile approach to international gateways.

And the STB should not be the owner of the scheme itself once funding has been approved. As noted on p31, a single local highway authority should take overall responsibility for delivery of each scheme, although in many cases this would be a lead authority, working closely with neighbouring authorities also having an ownership interest in the road

Where appropriate, the relevant LEP should be an active partner in development plans for an MRN road, particularly where the primary rationale is completing economic connections. It is important that proposed investments on the MRN align with the delivery of LEP Growth Deals and that the LEPs have a substantial input into the STB's overall prioritisation of projects.

9. Do you agree with our proposals to agree regional groupings to support the investment planning of the MRN in areas where no sub-national transport bodies (STBs) exist?

TfSE's interest in this question is limited to seeking assurance that arrangements for managing the development of the MRN in non-STB areas take full account of the impacts on neighbouring STBs. We look forward to effective cooperation with the regional grouping put in place for the South West in respect of strategic and local issues arising at our boundary with Dorset and with Wiltshire. It is also important that Transport for London plays an active role in the MRN programme, as many MRN corridors in our region continue into the Greater London area.

10. Are there any other factors, or evidence, that should be included within the scope of the Regional Evidence Bases?

We believe strongly that an effective Regional Evidence Base must embrace the role of Highways England's roads within the region: investment proposals for the MRN must be founded on an assessment of the role of the two networks in combination. And the Regional Evidence Base should also take account of major investment plans for the rail network which could affect demand for road-based transport.

Whilst the proposed fast-tracking of a number of schemes for early entry this year into the MRN Investment Programme means such proposals will not be underpinned by the full Regional Evidence Base, we recognise the value in making early progress with the MRN concept. It is likely that our constituent authorities will have proposals that they wish to be fast tracked.

11. Do you agree with the role that has been outlined for Highways England?

We fully support an active role for Highways England in the MRN Programme, in all English regions, whether or not an STB is in place, and so it will need to be sufficiently resourced for this role. As noted earlier, priorities for the MRN must take full account of plans in the RIS for the Highways England network. The consultation on Highways England's SRN Initial Report just concluded asked whether there should be any changes in the roads included in the SRN⁶, and so should soon settle the boundary between SRN and local authority roads for at least the next Roads Period. As a result, the Highways England role in the MRN should be limited to the four support activities proposed in the Consultation Document; any greater intervention in the responsibilities of local highway authorities or STBs would be inappropriate.

Eligibility & Investment Assessment

13. Do you agree with the eligibility criteria outlined?

(We address this question first, ahead of commenting, re Q12, on the cost thresholds that are then appropriate.) This early guidance on the types of scheme the Department feels should be eligible for funding is key to understanding the intended impact of the MRN Programme. We strongly support the inclusion of *Packages of Improvements*, and agree that these could play a crucial part in raising the standard of the MRN and in meeting TfSE strategic objectives for the road network in the region. A focus on a package of minor enhancements along an MRN corridor would be the most effective way of addressing deficiencies in the performance and safety of a road, and its environmental impact, along the lines of the Rees Jeffreys vision of an MRN that is fit for purpose. This could include adding separate cycling provision off-line, which could dramatically improve safety and traffic flow.

We see a potential model for the approach to key MRN corridors in the phased upgrading of All-Purpose Trunk Roads to expressways set out in Highways England's SRN Initial Report, with its aim of consistent treatment for longer stretches of road to improve their overall performance. The roll-out of the expressway concept to the busiest sections of the MRN as well as the SRN should be considered in the longer term.

As the Department sets out, some *Widening* and *Junction Improvements* will be sufficiently large-scale to qualify as MRN schemes in their own right, or indeed could be

⁶ In its response to that consultation TfSE has proposed for transfer to the SRN a number of roads in Kent which are treated here as remaining under LHA control and hence part of the MRN. Some of these roads perform an important role within the SRN, for longer-distance traffic; if they are to remain as MRN, there may be a case for allocating some RIS2 funding to the relevant LHA so that the road can best perform that support function.

proposed in combination for a short stretch of road, where investment needs to be more concentrated than for the longer corridor that would be the subject of a Package of Improvements. We would however expect improvement to junctions that link the MRN to the SRN to be led by Highways England and funded through the RIS.

Similarly, it is possible that some *Missing Links*, where they lead off the SRN, would better form part of the SRN and so should also be led by Highways England and funded through the RIS. We would expect all other Missing Links to gain MRN status once funded as part of the MRN Programme.

We note that *Major Structural Renewals* should also play a big role in raising the standard of the MRN, and indeed may be essential in ensuring the network is fully accessible to the freight traffic that is a key part of its rationale (see also response to Q16).

We welcome the inclusion of schemes focused on *VMS, Traffic Management and the Use of Smart Technology and Data*, and envisage that these would cover subsets of the Network rather than just individual stretches of road: these should as far as possible be fully integrated with (and use the same technologies as) existing and proposed new Highways England systems.

We note the prominence of *Bypasses* in the presentation of the MRN concept so far. These would clearly do much to enhance the performance of MRN roads and significantly reduce their local impacts – and so would be widely welcomed – but we think it important that they be developed as far as possible as part of a strategy for the MRN corridor as a whole, in which context they will be able to contribute most effectively to unlocking growth potential. Account must be taken of the effect, in terms of increased traffic, of taking forward only the most pressing bypass candidate on a road on communities elsewhere on the road.

We should comment on the proposed exclusions from programme eligibility too. We support the first and fourth exclusions proposed. We challenge however the suggestion in the second exclusion that some schemes on the SRN of a 'distinct local sub-national nature' could qualify for MRN funding; it will be important to hold to the principle that all work on the SRN itself is to be funded by Highways England through the RIS.

There is a presumption against covering **public transport improvements**, but the exception cited should in fact allow a substantial element of facilitation of bus and coach travel in plans for enhancing the MRN: this is potentially a significant contributor to reducing congestion, the first of the objectives for the MRN. All MRN roads should support better access to bus and coach services as a means of ensuring the whole network can be used as efficiently as possible.

Public transport, and other alternatives to the private car, should form a central component of a distinct approach to the needs of MRN corridors in urban areas. We endorse the special treatment proposed by the Rees Jeffreys report to what it classed as 'Tier 3' roads within the MRN, recognising how these roads serve the needs of 'place' as much as 'movement', and how management of such roads must be firmly in the context of the wider transportation policies for that urban area. We would expect

bus priority schemes and careful attention to enhancing the local streetscape to be prominent features of corridor improvements on urban MRN roads.

In all cases, we seek assurance that the revenue spending implications of all these capital investments will be addressed, through adjustment to existing funding channels for local highway authorities. We accept that the day-to-day maintenance of the MRN will remain the responsibility of LHAs through existing separate funding channels; we, and the authorities themselves, will rely on the Department ensuring adherence to the guiding principle for the MRN that local highways maintenance funding should not in any way be adversely affected by its creation. This could entail maintenance funding being increased where MRN interventions add to an authority's total road mileage.

12. Do you agree with the cost thresholds outlined?

Yes; we agree that the majority of cost-effective interventions should fall within the £20-50 million range, but we note that Packages of Improvement in particular may present a strong case for funding up to the £100 million limit. There may be need for some flexibility in the lower £20m floor, particularly where schemes are to be taken forward by smaller unitary LHAs, and given the constraints on local contributions.

14. Do you agree with the investment assessment criteria outlined?

15. In addition to the eligibility and investment assessment criteria described what, if any, additional criteria should be included in the proposal? Please be as detailed as possible.

We believe there is scope to adjust these criteria in line with the broadening of the overall objectives for the MRN that we suggest in response to Q1. Under *Support All Road Users*, safety for all users deserves most prominence, followed by a focus on journey quality for users: this should apply across the road network as a whole the assessments of end-to-end journey times, reliability and resilience that are proposed here under the narrower heading of *Support the SRN*. Greater buy-in from all stakeholders to investment in the MRN should be secured if the environmental impacts currently noted under *Reduce Congestion* were highlighted separately. As a new sixth objective, this could be expanded to also assess severance and design aspects of MRN investment proposals.

Other considerations

16. Is there anything further you would like added to the MRN proposals?

(a) The Consultation Document makes only passing references to the goal of **improving the performance of roads in the MRN**, but this must be a pre-condition for the network achieving its objective of supporting the economy. The MRN will be managed and funded alongside the SRN, which is now subject to a detailed performance specification, carefully monitored by the Office of Rail and Road. TfSE believes there should be a commitment, for the longer term, to move towards a comparable regime for the MRN. The success of the MRN programme will not come from a series of isolated enhancements alone, but from a concerted effort over several

investment cycles to improve the user experience of roads included in the network. To prepare for this necessary holistic focus on performance on the entirety of an MRN route, it is crucial that local highway authorities secure balanced funding, capital and revenue, to be able to live up to the raised expectations that MRN status will bring.

(b) There is also the key prior consideration of **standards for the infrastructure of MRN roads**. Even after a prolonged period of substantial investment, the MRN will vary greatly in standard of road; Rees Jeffreys proposed a permanent sub-division of MRN roads according to the context in which they operate, but TfSE sees no pressing need to work up a system of classification within the MRN (other than the need for a distinct approach to urban MRN roads). It will however be important to ensure that all roads in the MRN meet a certain minimum standard of capability, particularly with regard to HGV traffic and structures: investment, possibly smaller scale and outside the scope of the bidding process, will need to be directed to ensure that height and weight limits do not exclude some classes of motorised traffic from using the MRN.

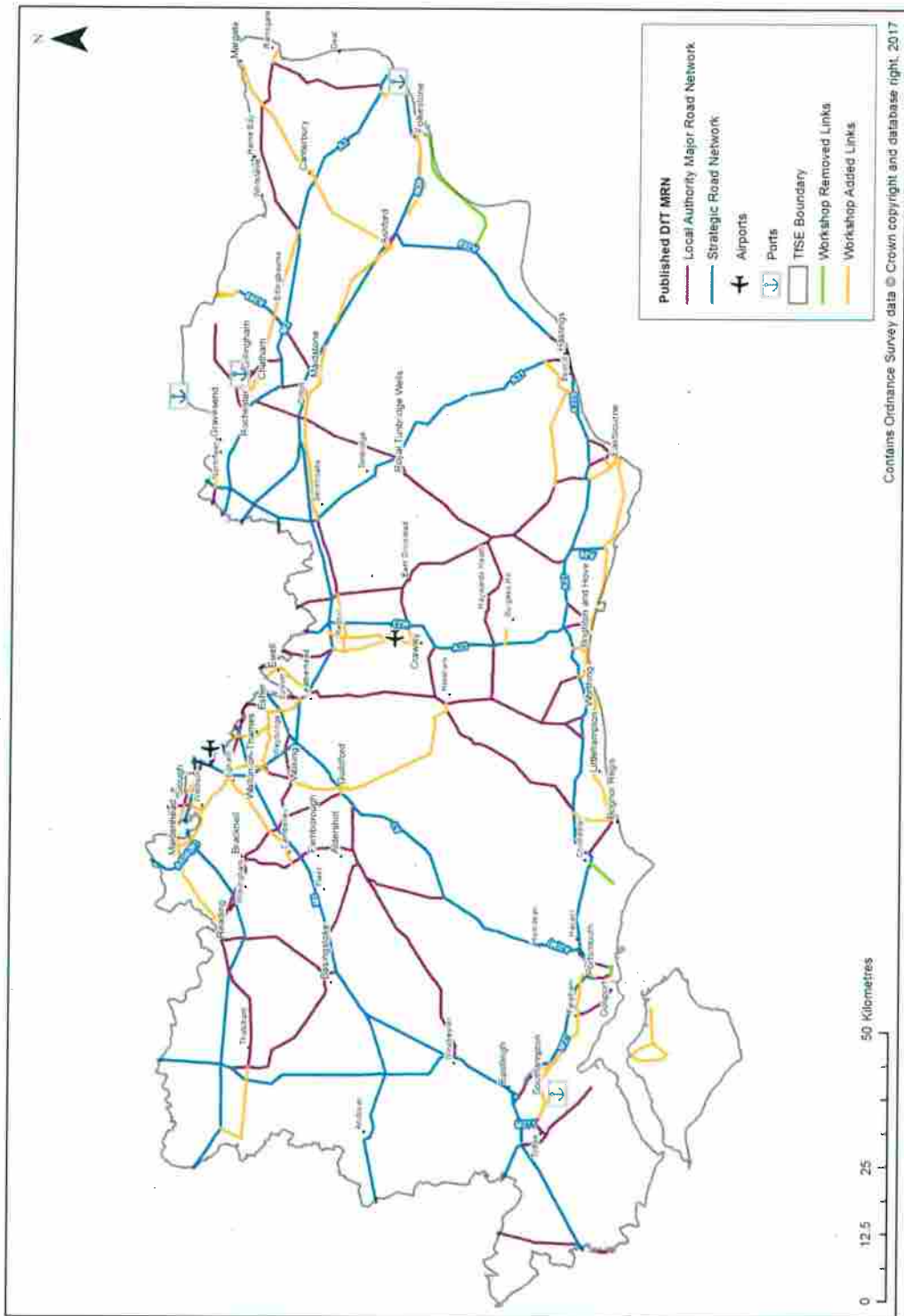
(c) Finally, we would appreciate clarification of the Government's intentions in relation to development consent and **applicability of the National Policy Statement for National Networks**: will the MRN, once designated, be classed alongside the SRN such that larger developments on the MRN automatically come within scope of the planning requirements for nationally significant infrastructure projects?

Annex B – Atkins Technical Report – Major Road Network Review

See separate document.

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Annex C. A map showing suggested changes to the proposed MRN in the South East



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