



Association of Directors of
Environment, Economy, Planning & Transport

PROPOSALS FOR THE CREATION OF A MAJOR ROAD NETWORK

Consultation Response from the Association of Directors of Environment, Economy, Planning and Transport (ADEPT)

General Comments

ADEPT is pleased to provide this response to the Department for Transport (DfT's) consultation document dated 23 December 2017 on the creation and operation of a Major Roads Network (MRN). Responses to the individual consultation questions are set out below, but ADEPT would wish to stress its support for the principles of creating and supporting the MRN and also its willingness to play an active role in ensuring that the initiative meets its objectives.

ADEPT notes that the definition of the MRN is restricted to local authority roads and will exist in parallel to, rather than being fully integrated with the Strategic Road Network (SRN). This will inevitably lead to concerns over the equitable distribution of resources, although the proposed Regional Evidence Bases should become instrumental in making the case for sufficient investment in the MRN.

Answers to Consultation Questions

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

ADEPT supports the core principles set out in the consultation document, and welcomes the recognition that successful operation of the MRN will depend upon strategic maintenance of the asset as well as 'improvement' schemes. It is recognised that the National Roads Fund is not intended to substitute routine maintenance funding, but ADEPT will look to work with partners through Regional Evidence Bases to ensure that the need for the latter is fully recognised. This will require an ongoing dialogue over the function of the MRN relative to the SRN and their resource needs.

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

ADEPT recognises the need for quantitative criteria in defining the MRN. It is inevitable, though, that some of the economic importance of potential MRN routes lies in the value of goods being carried or the economic role of the destinations served. It is important, therefore, that quantitative criteria are not imposed too rigidly.

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

Given the response to question 2 above, it is essential that sensible qualitative criteria are applied. ADEPT would not oppose the use of those set out in the consultation document but would also stress the need for Government to work closely with partners at sub-national level to ensure a sensible outcome and national consistency. ADEPT itself will not offer, at

national level, any comments on specific roads to be included or excluded (under questions 4 and 5).

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

It is essential that the definition and management of the MRN is dynamic and able to respond to changing needs. There is a balance to be struck between the resources required to review the MRN and those required to bring forward projects, and with this in mind a five-year review cycle appears sensible.

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

ADEPT supports the proposals that MRN roads should continue to be managed at local level and also that sub-national transport bodies (STBs) should take a key role in defining investment needs and in the selection process for projects. STBs will be well placed to ensure integrated approaches to the SRN and MRN with the objective of a consistent user experience. ADEPT would not wish to see any area penalised through the lack of a functioning STB and will wish to work closely with both Government and local partners to ensure that suitable Regional Evidence Bases are in place for all areas. The proposed role for DfT is sensible, but see the response to question 11 below regarding Highways England.

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

None which would necessarily apply across all areas.

9. Do you agree with our proposals to agree regional groupings to support the investment planning of the MRN in areas where no STBs exist?

Yes, and ADEPT will offer an active role in supporting these areas.

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

Not that would necessarily apply at national level. However ADEPT would encourage DfT to allow STBs (and others as appropriate) the flexibility to produce Regional Evidence Bases incorporating whatever evidence is appropriate at sub-national level. It would also be sensible to allow some flexibility over the review periods for these in order to ensure that the resources required are used sensibly. Notwithstanding this, ADEPT would strongly support the creation of a clear investment programmes (over at least five-year periods) at sub-national level to provide sufficient certainty to scheme promoters and suppliers.

ADEPT has been made aware of the further comments on 'fitness for purpose' criteria offered by David Quarmby and Phil Carey in their consultation response, and would support consideration being given to these [repeated in the Annex below for clarity].

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

ADEPT would have some concerns over Highways England both being dependent on the National Roads Fund for its own (SRN) programmes and having a direct role in assessing the MRN programme. There is some potential conflict of interests brought about through this. It would be hoped that Regional Evidence Bases, and the role of Highways England in STBs, will bring about an appropriate level of involvement for Highways England which falls short of being an assessor of MRN investment plans.

12. *Do you agree with the cost thresholds outlined?*

ADEPT accepts the need for cost thresholds in some form. However, there will be a significant gap for most promoters between the maximum which might be afforded through other means (such as Local Transport Plan capital) and an entry threshold of £20 million for the National Roads Fund. Clearly, the assembly of scheme 'packages' may assist, and it will be essential that these are holistic and ensure that the benefits of increased roadspace are 'locked in' through support for public and sustainable transport. There may also be a case for considering smaller schemes with particularly strong business cases.

13. *Do you agree with the eligibility criteria outlined?*

Clearly, any project will need to demonstrate benefits to the operation of the MRN. There is no particular need, though, to adopt tight criteria in advance of the production of Regional Evidence Bases or the consideration of candidate projects. Whilst it is understood that DfT will wish to ensure that the National Roads Fund is not substituting other investment streams it is possible to envisage, for example, major public transport projects which would benefit the MRN but not be deliverable through other means.

14. and 15. *Do you agree with the investment criteria outlined, and should any additional criteria be included?*

ADEPT agrees with the criteria suggested, although weightings for these will be worth considering to reflect the findings of Regional Evidence Bases.

16. *Anything more to add?*

ADEPT, as noted above, is aware of the comments offered by David Quarmby and Phil Carey on the adoption of a performance specification for the MRN comparable to that already in place for the SRN, and would offer tentative support; however, complete comparability with the SRN would imply funding support for the MRN which goes beyond the major improvement projects currently envisaged.

Annex – Extract from David Quarmby and Phil Carey Response

We believe that REBs should also capture data to enable the MRN in that region to be assessed against the 'fitness for purpose' proposals featured in Chapter 5 of the RJRF report – a concept which is not specifically recognised in the Consultation Document. It could include the following aspects

- Fit for the user – actual standards (including road condition and maintenance as well as operational performance) which the user can expect to experience according to the Tier of road (our RJ report proposed three Tiers of road¹). In addition to the road condition proposed in the Consultation Document, we suggest each REB should include an assessment of the user performance standards on the MRN in their region. This could echo to some extent the specification in place for the SRN under the Roads Investment Strategy, and must take account of the needs of different types of users, including vulnerable users such as cyclists and pedestrians, not just on urban MRN roads.
- Fit for communities and environment. We suggest each REB should include an assessment of where MRN sections achieve worse-than-acceptable standards of environmental and community impact. There is as yet no recognised target standard for this, but the approach to the MRN could be guided by ambitions set in the RIS for the SRN, scaled appropriately for the generally less-trafficked MRN.

- Fit for purpose management. We suggest that each REB should provide an assessment of where road capacity is not being optimised where the demand is significant, and where the potential exists for investment through this programme, for example in technology and associated corridor improvements, to improve performance.

- A fit safety management regime. We suggest that each REB should provide an audit of where collision and other data indicate MRN sections that would most benefit from road infrastructure interventions to improve safety – particularly of vulnerable road users. DfT should encourage the use of predictive risk assessment to facilitate this. The Road Safety Foundation and its international partners have pioneered such methods, which Highways England has committed to use for analysing and prioritising safety improvements for the SRN. Indeed, DfT commissioned a report from TRL in 2015 which analyses and recommends practical options for predictive risk assessment in road safety planning that local highway authorities might adopt, referenced in our RJRF report (reference xxxi)²

- Fitness for purpose of the MRN in cities and conurbations. Of the three tiers into which the RJRF report classified MRN roads, Tier 1A and Tier 3 roads fall in urban areas. For these roads, interventions to improve performance on the MRN must take account of the wider and potentially more complex transport and planning policies that will have been adopted, city by city – for example policies intended to restrain road traffic, or encourage greater use of buses and more cycling and walking, perhaps through traffic management and priority measures.

- Fitness for purpose planning regime. We are pleased to see that the planning regime set out in the Consultation Document would, if implemented as proposed, achieve this aim – with three provisos:

- o first, that there should be close working, with agreed protocols, between each STB and Highways England (and the relevant combined authorities where appropriate) to ensure integrated analysis, planning, scheme development and prioritisation of the MRN and that region of the SRN;

- o second, that the STB, working with Network Rail, should ensure that the REB and the planning process for the MRN must fully take account (where relevant) of the role of, and plans for, the rail network in the region, particularly for commuting;

- o third that the STB should take the lead with LAs and LEAs in ensuring that the REB embraces the spatial and economic plans for the region, especially where they influence or are influenced by the MRN (and SRN).

1 Tier 1 are limited purpose-built dual carriageways (Tier 1A are in urban areas); Tier 2 are multiple access, all-purpose, rural roads; Tier 3 are multiple access, all-purpose urban roads (p15 of the RJRF report)

2 Road Safety Models, Report PPR 70, Transport Research Laboratory 2015