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MRN Consultation
Department for Transport
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By email: MRNconsultation@dft.gsi.gov.uk

18th March 2018

Dear Department for Transport

Proposals for the creation of a Major Road Network

This is the formal response of the Sussex branch of the Campaign to Protect Rural England (CPRE Sussex) to the above consultation. CPRE Sussex works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country. We encourage appropriate land use, farming, woodland and biodiversity policies and practice to improve the well-being of rural communities.

Our response is set out in Appendix A attached to this letter.

Yours sincerely,

A handwritten signature in black ink that reads 'Kia Trainor'.

**Kia Trainor,
Director
CPRE Sussex**

Appendix A

Proposals for the creation of a Major Road Network

1. Introduction

As part of the Transport Investment Strategy, the government announced that it would take forward proposals to create the Major Road Network (MRN).

This middle-tier of economically and strategically important local authority 'A' roads will sit between the nationally-managed Strategic Road Network (SRN) and the rest of the Local Road Network. These roads will benefit from targeted funding available through a share of the National Roads Fund, with the aim to improve productivity and connectivity in our towns and cities.

In creating this network, the government has 5 central policy objectives. These are:

Reduce congestion – alleviating local and regional congestion, reducing traffic jams and bottlenecks.

- Support economic growth and rebalancing – support the delivery of the industrial strategy, contributing to a positive economic impact that is felt across the regions.
- Support housing delivery – unlocking land for new housing developments.
- Support all road users – recognising the needs of all users, including cyclists, pedestrians and disabled people.
- Support the SRN – complementing and supporting the existing SRN by creating a more resilient road network in England.

This consultation seeks views on the government's proposals for how the MRN will achieve these policy objectives across 3 themes. These are:

- defining the network
- investment planning
- eligibility and investment assessment criteria

The proposals in this consultation outline how the MRN will:

- form a consistent, coherent network alongside the SRN that brings about the opportunity to better co-ordinate roads investment
- provide funding certainty to roads in the network, through use of the National Roads Fund, and raise standards and performance across the new network
- provide clear roles for local and regional partners, who will support the government to deliver and develop MRN schemes

Confidentiality

We thank all respondents for taking the time to read the consultation document and to respond to the consultation questions. **Your views on the programme's core objectives and principles, as well as the major themes set out in the consultation, will contribute to the formulation of MRN policy.**

2. Respondent details

Your contact details. We will only contact you if we need to clarify any of the answers you give us.

Your name

Your email

In what capacity are you responding?

- ☐ Central government, executive agency or non-departmental public body
- ☐ Local authority or combined authority
- ☐ Sub-national transport body, ADEPT or other regional partnership (public sector)
- ☐ Industry or business (private sector)
- ☐ MP / Councillor
- ☐ Member of the public

X Other (please specify):

In which region are you based?

- ☐ East Midlands
- ☐ London
- ☐ East of England

- ☐ North East
- ☐ North West
- X South East
- ☐ South West
- ☐ West Midlands
- ☐ Yorkshire and the Humber

3. MRN core principles

Questions in this section relate to pages 20 to 21 of the consultation document, 'MRN Core Principles'.

In order to deliver our objectives for the MRN, we believe there are a number of fundamental principles that must be at the heart of our plans for a MRN and its programme of investment. These are:

- increased certainty of funding
- a consistent network
- a coordinated investment programme
- a focus on enhancement and major renewals
- clear local, regional and national roles
- strengthening links with the Strategic Road Network

Q1. Do you agree with the proposed core principles for the MRN outlined in the consultation document?

☐ Yes

X No

☐ Don't know

4. MRN core principles

If you answered no, which core principle(s) do you disagree with? Provide an explanation why.

We would like to see environmental improvements included as an additional MRN core principle in order to ensure consistency with other Government priorities such as the Clean Growth Strategy, UK CCC and 25 year Environment Plan. See the joint report 'Rising to the challenge'

https://www.bettertransport.org.uk/sites/default/files/research-files/Rising-to-the-Challenge-2017_0.pdf

In addition to strengthening links with the SRN, the MRN should link to other multimodal transport plans. The Rees Jeffreys Road Fund Study states that

"Roads are crucial but can only perform well if managed as the core infrastructure in an overall transport strategy, to support economic growth and improve the quality of life and mobility. This must recognise the wide range of transport modes which use roads, as well as the role of rail, and embrace a willingness to consider options for demand management to contain road traffic congestion over the longer term".

However, this proposal focusses only on road transport. If the government is to follow the recommendations of its consultant, the approach should be to include other forms of transport especially rail and therefore integrate rail & road transport in one strategy.

We would also consider safety to be an important consideration in the MRN, worthy of inclusion as another core principle, given the cumulative cost of road accidents. There appear to be various statistics available but the following roads in the south east figure highly:

A 21

A 28

A 206

A 217

A 259

A 285

Therefore consideration should be given to safety improvements on the MRN.

5. Defining the network

Questions in this section relate to pages 22 to 27 of the consultation document, 'Defining the Network'.

The extent of the network must strike a balance between capturing the most economically important regional roads and ensuring that its size is appropriate, enabling investments that can drive an improvement to the level of funding available.

Any definition must make the best use of local and regional knowledge to ensure that the most economically important roads are captured. To strike this balance appropriately, we are proposing the use of both quantitative and qualitative criteria to define the network. This approach ensures:

- the network is coherent, i.e. more than just a set of fragmented sections of road
- the network has a sound, objective analytical basis, yet also has the flexibility to factor in local knowledge and requirements

Q2. To what extent do you agree or disagree with the quantitative criteria outlined in the consultation document and their proposed application?

☐ Strongly agree

☐ Agree

☐ Neither agree nor disagree

X Disagree

☐ Strongly disagree

6. Defining the network - quantitative criteria

If you disagree or strongly disagree, what should be the quantitative criteria?

The problem with using the Average Annual Daily Flow (AADF) is that it underscores roads with a higher proportion of Multimodal journeys, such as bus journeys. A better indicator would be Multimodal movement across transport corridors.

7. Defining the network - qualitative criteria

Q3. To what extent do you agree or disagree with the qualitative criteria outlined in the consultation document and their application?

☐ Strongly agree

☐ Agree

☐ Neither agree nor disagree

X ☒ Disagree

☐ Strongly disagree

8. Defining the network - qualitative criteria

If you disagree or strongly disagree, what should be the qualitative criteria?

Additional qualitative criteria should include interconnectivity with other transport modes and environmental impact. A better way of approaching road investment would be to initially assess where improvements to infrastructure or demand management interventions could be effective and use road improvements as a final option in the decision-making hierarchy.

A continued focus on new road capacity will take resource away from maintenance and/or safety improvements and will only serve to generate more traffic, leading to more congestion and less reliability in future.

9. Defining the network

Q4. 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?

☐ Yes

X No

☐ Don't know

If no, explain how the criteria are failing to identify a section of road you feel should be included.

The MRN should be planned and managed as part of an integrated, multi-modal transport network, rather than in isolation.

Q5. Have the quantitative or qualitative criteria proposed in the consultation document identified sections of road you feel should not be included in the MRN?

X Yes

☐ No

☐ Don't know

If they have, explain why these roads should not be included in the MRN.

Some sections identified would not be appropriate for expansion, for example the A22 abuts the Ashdown Forest which is an EU protected site. Increased vehicle movements and associated nitrogen deposition would contravene compliance under the Habitats Regulations. We are also concerned about the proposed MRN routes that pass through National Park/AONBs in contravention of the designation. A SEA / HRA should have been carried out as part of this analysis.

10. Defining the network – refreshing the MRN

It will be important for the MRN to remain relevant and reflect the latest data and changes to economic centres and road use. However, this must be balanced against the need to provide a stable platform on which the MRN investment programme can be delivered.

We propose to review the MRN every 5 years to coincide with the existing Road Investment Strategy (RIS) timetable. This will involve updating and reviewing the data that are used and engagement with all bodies involved in the delivery of the MRN programme.

Q6. Do you agree with the proposal for how the MRN should be reviewed in future years?

☐ Yes

X No

☐ Don't know

If you answered no, how should the MRN be reviewed in future years?

We would like to see a review which takes into account a range of environmental indicators as part of the data set, linking to other Government Strategies.

11. Investment planning

Questions in this section relate to pages 28 to 31 of the consultation document, 'Investment Planning'.

The creation of the MRN should support long-term strategic consideration of investment needs in order to make best use of the targeted funding that will be made available from the National Roads Fund and deliver the best possible result for the user. The important national and regional role played by roads included in the MRN means that individual local authorities cannot plan investments in isolation, nor can decisions be completely centralised at either a regional or national level.

As set out in the core principles section of the consultation document we propose that, alongside the local role of highways authorities, there needs to be a strong regional focus for investment planning within a consistent national network. The consultation document sets out roles for:

- local bodies (such as local authorities and local highways authorities)
- regional bodies (such as sub-national transport bodies)
- national bodies (such as the department)

Q7. To what extent do you agree or disagree with the roles outlined in the consultation document for:

	Strongly agree	Agree	Neither agree not disagree	Disagree	Strongly disagree
Local bodies	<input type="checkbox"/>	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
Regional bodies	<input type="checkbox"/>	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>
National bodies	<input type="checkbox"/>	<input type="checkbox"/>	x	<input type="checkbox"/>	<input type="checkbox"/>

If you have selected Disagree or Disagree Strongly for any of the proposed roles, what should the role involve? Specify which role you're referring to, ie local, regional or national.

12. Additional roles and responsibilities

Q8. What additional responsibilities, if any, should be included? State at which level these roles should be allocated.

Local and regional bodies should work together to identify investment priorities for strategic corridors on a multi-modal basis, of which road investment is just one part.

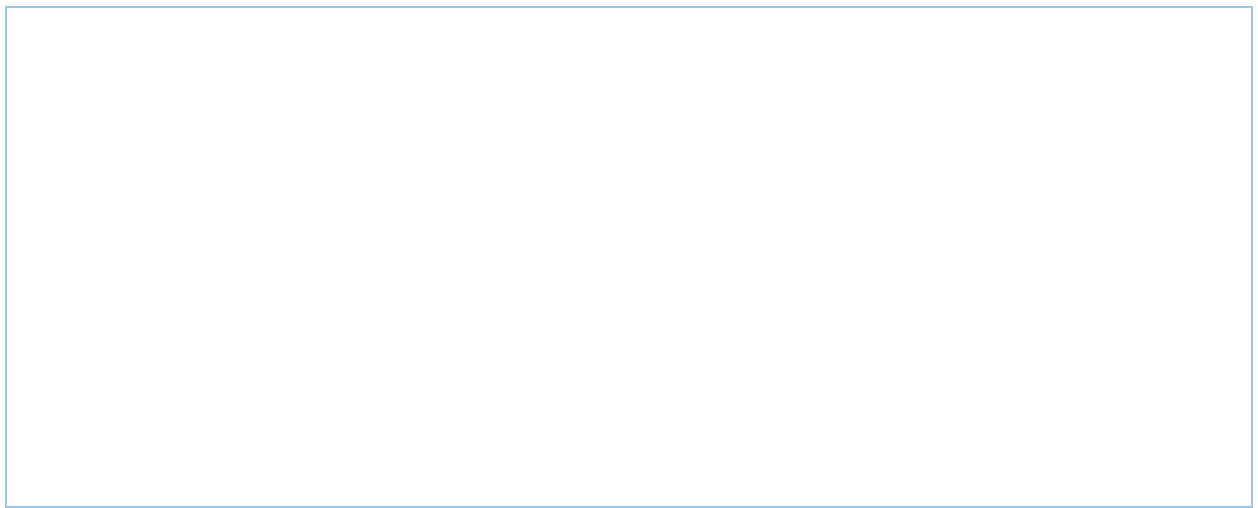
Q9. Do you agree with our proposals to agree regional groupings to support the investment planning of the MRN in areas where no sub-national transport bodies (STBs) exist?

☒ Yes

☐ No

☐ Don't know

If you answered no, explain how the MRN should be managed in regions where no STBs exist.



13. Investment planning – regional evidence base

We propose that STBs or regional groups would be responsible for developing a regional evidence base which would be the basis for the development of the MRN investment programme. Where STBs exist we expect that the regional evidence base would be developed from the existing statutory transport strategies for which STBs are responsible.

The regional evidence base would be evidence-based and should not be limited to performing a mechanical sifting exercise. As a minimum, the department would expect them to comprise the following:

- an assessment of the overall condition of the existing network and its performance.
- the identification of network-wide issues and priority corridors.
- analysis of potential region-wide solutions and the development of specific interventions to tackle the issues identified over at least a 5 year period, although we expect and encourage STBs or regions to look beyond this in their strategic planning.
- an assessment of the potential sequencing of the schemes identified.

Q10. Are there any other factors, or evidence, that should be included within the scope of the regional evidence bases?

☒ Yes

☐ No

☐ Don't know

If you answered yes, describe the additional factors or evidence you feel should be within the scope of the regional evidence bases.

Any region-wide 'solutions and specific interventions to tackle the issues identified over at least a 5 year period' should be part of a wider multimodal strategy and include environmental issues such as air quality and meeting climate change targets.

14. Investment planning – the role of Highways England

A core principle of the MRN programme is to bring more coordinated planning to these important roads. **Given Highways England's experience in road investment planning, and the need** to ensure a seamless transition between the SRN and MRN, we propose that Highways England, the body responsible for running the SRN, should also have a role in the MRN Programme. This role could include:

- programme support - Highways England could have a role in the governance of the MRN investment programme advising the department on the development of the MRN pipeline and its interactions with the SRN, and providing wider support as needed.
- analytical support - Highways England could support the department in analysing the regional evidence bases in order to prepare advice to ministers on the MRN investment programme.
- cost estimate support - Highways England could support the department in assessing scheme cost estimates.
- delivery support - Highways England could support, if required, LAs in the delivery of agreed MRN schemes. This could include advising LAs on design and development as well as supporting access to the supply chain to enable LAs to take advantage of economies of scale that may be available.

Q11. Do you agree with the role that has been outlined in the consultation document for Highways England?

☐ Yes

X No

☐ Don't know

If you answered no, what should be the role of Highways England?

Although Highways England will need to have a role in the MRN to ensure a joined-up approach, it would be more appropriate as an advisory body as it does not have the local knowledge and political influence of the SRTB or Local Authorities.

15. Eligibility criteria

Questions in this section relate to pages 32 to 35 of the consultation document, 'Eligibility and investment assessment criteria'.

The department does not intend to replace existing funding streams such as formula funding for Highway Maintenance or Integrated Transport Block funding which may be directed to any LA roads including the MRN network. For that reason, we propose that funding to improve and enhance the MRN should be targeted towards significant interventions that will transform important stretches of the network.

We propose that only proposals for contributions of £20 million or over will be considered for MRN funding. As we want this fund to benefit all areas of the country and produce an improvement for users across the network we would expect that most funding requests would not exceed £50 million, where there is a strong case we would be willing to consider scheme proposals requiring higher contributions, up to a maximum of £100 million.

To get the best value for money, regions and local authority promoters should work to minimise scheme costs through scheme optimisation and the securing of third party contributions, alongside local contributions. We are proposing the following schemes would be eligible for MRN funding:

- bypasses
- missing road links
- widening of existing MRN roads
- major structural renewals
- major junction improvements
- variable message signs
- traffic management and the use of smart technology and data
- packages of improvements

Q12. Do you agree with the cost thresholds outlined in the consultation document?

☒ Yes

☐ No

☐ Don't know

If you answered no, what should be the cost thresholds?

Q13. Do you agree with the eligibility criteria outlined in the consultation document?

☐ Yes

X No

☐ Don't know

If you answered no, what should the eligibility criteria be?

We would support 'packages of improvements' if this enables an area to meet wider environmental and safety objectives and opportunities for NMU.

16. Investment assessment criteria

To support the development of regional evidence bases and a national investment programme we are proposing that a clear set of criteria be developed. These support the government's overarching objectives for the MRN programme whilst providing local and regional bodies the flexibility to develop proposals that support the delivery of local and regional objectives.

We propose that these criteria should be as follows:

Objective	Criteria
Reduce Congestion	<ul style="list-style-type: none">○ Alleviate Congestion○ Environmental Impacts:<ul style="list-style-type: none">○ Improve air quality and biodiversity○ Reduce noise and risk of flooding○ Protect water quality, landscape and cultural heritage sites
Support Economic Growth & Rebalancing	<ul style="list-style-type: none">○ Industrial Strategy: Supports regional strategic goals to boost economic growth○ Economic Impact: Improve ability to access new or existing employment sites○ Trade & Gateways Impact: Improve international connectivity, e.g. access to ports & airports
Support Housing Delivery	<ul style="list-style-type: none">○ Support the creation of new housing developments by improving access to future development sites and boosting suitable land capacity
Supporting All Road Users	<ul style="list-style-type: none">○ Deliver benefits for non-motorised users, including cyclists, pedestrians and disabled people○ Safety Benefits: Reduce the risk of deaths/serious injuries for all users of the MRN
Support the SRN	<ul style="list-style-type: none">○ Improve end to end journey times across both networks.○ Improve journey time reliability○ Improve SRN resilience

Q14. Do you agree with the investment assessment criteria outlined in the consultation document?

☐ Yes

X No

☐ Don't know

If you answered no, what should the investment assessment criteria be?

The Major Roads Network should not be used to stimulate housing developments in unsustainable locations. Instead transport investment policy should support the National Planning Policy Framework, which requires local plans to “seek more intensive use of existing land and buildings and include minimum density standards in town and city centres and around transport hubs” to avoid ‘sprawl.’

Q15. In addition to the eligibility and assessment criteria described what, if any, additional criteria should be included in the proposal? Please be as detailed as possible.

We would like to see broader criteria for ‘environmental impacts’ to include meeting climate change targets. We would also like to see reference to irreplaceable and protected habitats such as ancient woodland.

We recommend the proposed priorities for RIS2 investment set out in our report “Rising to the Challenge” which could be applied to the MRN as well as to the SRN.

17. Other considerations

Q16. Is there anything further you would like added to the MRN proposal?

Future investment in road schemes should focus on establishing a safer, well-maintained and smart road network, rather than growing capacity, with budget allocations to match this priority.

There needs to be an integrated view of transport including rail, road, bus, cycling, and facilities for those who use mobility devices. This consultation does not offer any integration with road to rail transfer, road freight to rail freight transfer, road to bus transfer and access to airports & sea ports. HS2 is one of the biggest Investments this country is making on transport and yet this consultation makes no comment on how people will transfer from car to HS2 and vice a versa.

The report talks about how building roads will help walkers cyclists and the disabled but it makes no suggestion of how exactly this will be done!

How will a 'roads only' approach help families `who do not have a car and the growing number of young people who are not taking up car ownership?

