
To: Department for Transport
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Subject: Consultation on Proposals for the Creation of a Major Road Network
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Background to Q1

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*
- *local and regional contributions*
- *strengthening links with the Strategic Road Network*

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

No.

"a focus on enhancement and major renewals [of major roads]" is too narrow. It should be secondary to achieving modal and temporal shift from use of roads at peak times. Where this is achievable, it is more effective and sustainable than increasing road capacity.

This is in the context of the first policy objective, to "reduce congestion," which can be achieved in three ways:

- 1) Reduce the volume of road traffic.
- 2) Displace peak-time trips to off-peak.
- 3) Increase road capacity.

Induced demand reduces the benefits of (3) over time, so (1) and (2) should have higher priority.

Background to Q2

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, ie 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?

Agree

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

Agree

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 (This answer applies only to Cambridgeshire)

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?

No (This answer applies only to Cambridgeshire)

Background to Q6

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

Background to Q7

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:

local bodies: Agree

regional bodies: Agree

national bodies: Strongly agree

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

Background to Q9

The SRN and MRN must be planned, developed and managed in tandem with the rail and cycle networks. The separation of these modes of transport leads to poor allocation of resources.

For instance, the Mayor of Cambridgeshire and Peterborough will request funding from the MRN budget to dual the A10 between Cambridge and Ely to relieve congestion. Congestion would be relieved more effectively and permanently by:

1. *Works that are long overdue on the parallel railway line:*

 - A. *Lengthening platforms at Waterbeach station (and ultimately moving the station north to provide better connectivity to the A10, Waterbeach New Town, and provide space for accessibility and other features currently lacking).*
 - B. *Remodelling Ely North junction to increase capacity.*
 - C. *Building a Cambridge South station to enable direct access to the fast-growing Biomedical Campus (expected to have 28,000 employees plus hospital outpatients and visitors within ten years).*

2. *Constructing a segregated cycle way from Waterbeach to north Cambridge.*
3. *Providing a bus-only shortcut from the A10 at the Milton Park & Ride to the south side of the A14, bypassing the A10-A14 interchange.*

Funding and powers must be made available at a regional level for development of the most appropriate transport modes: rail, road, busway or segregated (protected) cycleways.

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?

No.

There is a lack of transparency and accountability at the regional level. LEPs, in particular for Greater Cambridge Greater Peterborough, have been criticised for this by, amongst others, the Public Accounts Committee.

There are four LEPs covering East Anglia:

- New Anglia (Norfolk & Suffolk)
- Greater Cambridge Greater Peterborough (Cambridgeshire, Peterborough, Rutland, and parts of Norfolk, Suffolk, Lincs, Herts, Essex)
- South East (Essex)
- Herts

There are other regional bodies also engaged in economic planning, such as England's Economic Heartland.

This is messy and not conducive to transparency and clear lines of accountability. This must be sorted out before new powers are conferred on LEPs. Creating a new STB for East Anglia may be the way forward, but only if other bodies, such as LEPs, are subsumed or eliminated.

In building their Regional Evidence Base, STBs must be able to demonstrate impartiality and objectivity: politically, geographically and modally (all transport modes).

Background to Q10

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.

1. **Non-road options for achieving policy objectives:** alternative transport modes;

efficiency gains (e.g. from reducing empty-running of HGVs or incentivising temporal shift of trips that are not time critical).

2. **Induced demand:** e.g. modal shift away from more sustainable and efficient transport modes; inducement for people to live further from their places of work and leisure.
3. **Land use:** the degree of co-ordination of spatial and transport planning has a huge bearing on the level of car use and dependency. STBs need to ensure that the location and permeability of new developments maximises the attractiveness and viability of walking, cycling and public transport.
4. **Environmental sustainability:** e.g. climate change impacts, energy efficiency, flood risks, biodiversity.
5. **Social impact:** e.g. reducing viability of public transport leading to isolation of communities; severance of community ties by wider, faster roads; public health impacts from people's exposure to higher levels of noise and pollution.

(4) is inexplicably cited as part of the criteria for the policy objective of reducing congestion. (4) and (5) should be captured as distinct policy objectives.

Background to Q11

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

Background to Q12

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?

No.

The upper limit is reasonable, but should be reviewed periodically.

The lower threshold risks encouraging scheme inflation: an intervention that might

reasonably require a contribution of £16m from the MRN may be pumped up to reach the £20m threshold.

If a scheme can demonstrate a high BCR and that alternative funding sources are not available (with reasonable justification) then it should qualify, irrespective of the cost.

There needs to be much more incentive and encouragement to local authorities to implement small interventions with large benefits, such as installing variable message signs, making junctions safer for all road users, or bridging major roads to encourage more people to walk or cycle.

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

No.

“Major junction improvements” should include grade-separation of rail crossings, where funding is not allocated in the next Network Rail Control Period and the BCR is high enough to warrant earlier intervention.

Any intervention that delivers on the policy objectives should be eligible, not just road infrastructure schemes. All transport modes should be eligible. Short-term and experimental revenue interventions should also be eligible (e.g. providing information on travel options, or trialling new bus services).

DfT should be encouraging creativity and innovation and not being overly prescriptive.

Background to Q14

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
<i>Reduce congestion</i>	<i>Alleviate congestion</i> <i>Environmental impacts: improve air quality and biodiversity</i> <ul style="list-style-type: none"> • <i>reduce noise and risk of flooding</i>

Objective	Criteria
	<ul style="list-style-type: none"> • <i>protect water quality, landscape and cultural heritage sites</i>
<i>Support economic growth and rebalancing</i>	<p><i>Industrial strategy - support regional strategic goals to boost economic growth.</i></p> <p><i>Economic impact - improve ability to access new or existing employment sites.</i></p> <p><i>Trade and gateways impact - improve international connectivity, eg access to ports & airports.</i></p>
<i>Support housing delivery</i>	<i>Support the creation of new housing developments by improving access to future development sites and boosting suitable land capacity.</i>
<i>Supporting all road users</i>	<p><i>Deliver benefits for non-motorised users, including cyclists, pedestrians and disabled people.</i></p> <p><i>Safety benefits - reduce the risk of deaths/serious injuries for all users of the MRN.</i></p>
<i>Supporting the SRN</i>	<p><i>Improve end to end journey times across both networks.</i></p> <p><i>Improve journey time reliability.</i></p> <p><i>Improve SRN resilience.</i></p>

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

No.

Environmental impact criteria should be assigned their own policy objective (e.g. “Environmentally Sustainable”) - see answer to Q10.

It should be made clearer that “non-motorised users” are not a distinct and static class of people, and that all interventions should be aimed at increasing the proportion of trips that people make on foot or cycle. Therefore instead of “Deliver benefits for non-motorised users ...”:

- Improve provision for people walking and cycling, including for children and those with disabilities, so as to make walking and cycling attractive and convenient for more trips, especially where these are currently made by car.

The objective of “Supporting the SRN” should be broadened to “Supporting the Strategic Transport Network”, i.e. including rail and bus/coach. The criteria for journey times then apply equally to road, rail and bus/coach. The third criterion should be:

- Improve resilience of the Strategic Transport Network (i.e. including rail and bus/coach) when under stress or disrupted.

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.

The criteria for “Reduce congestion” should be:

- Reduce peak volumes of motor traffic [instead of “*Alleviate congestion*”]
- Increase the carrying capacity of the Strategic Transport Network (i.e. including passenger and freight rail and bus/coach)

Environmental criteria should include reference to Climate Change and Carbon Footprint, e.g.

- Enable a reduction in energy consumption and CO₂ emissions

There should be social impact criteria associated with an additional policy objective (e.g. “Welfare”) - see answer to Q10:

- Contribute to improved public health, physical and mental
- Promote social cohesion and reduce isolation

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

In summary, we would like to see the following additions and amendments to the policy objectives:

- **Reduce congestion** – reducing peak volumes of motor traffic on Strategic and Major roads, by increasing the capacity and efficiency of the road and rail network.
- **Support all road users** – improving provision for people walking and cycling, including for children and those with disabilities.
- **Support the Strategic Transport Network** – reducing end to end journey times and variability by road and rail, with greater resilience to cope with disruption.
- **Environmental sustainability** – reducing energy consumption, emissions of CO₂ and

other pollutants, and preserving natural and built heritage.

- **Welfare** – Promoting public health and social cohesion.

(Other objectives unchanged)