

## **Proposals for the creation of a Major Road Network ~ response from Campaign for Better Transport**

**March 2018**

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment.

We welcome the opportunity to respond to the Government's proposals for a Major Road Network (MRN).

### **Summary**

The Rees Jeffreys report calling for the creation of a Major Roads Network played an important role in highlighting the funding gap between SRN and local authority roads.

We welcome the allocation of more resources for local transport. It is right that some of the billions of pounds of public funds currently spent on the Strategic Road Network should also be made available for the local road network which carries most journeys.

However, we believe the funding criteria should be changed to allow for a focus on road maintenance and safety as well as provision for public transport, walking and cycling, and that the minimum project size should be reduced to allow for high quality smaller schemes to qualify for funding.

Changing the proposed criteria for MRN funding would help deliver a network that is designed around people, not cars. That is the best way to improve everyday travel for all communities and to deliver the Government's goals of connecting people, cutting congestion and supporting sustainable growth. To that end, the MRN strategy should, alongside the second Road Investment Strategy, be subject to a Strategic Environmental Assessment, to ensure that funding supports transport while avoiding environmental harm.

While we welcome broadening the Government's proposed Roads Fund to include local authority roads, we are concerned that limiting it to projects like big new bypasses and road widening will neglect the most important priorities and could make transport conditions worse.

Current proposals limit the MRN spending to road projects over £20 million. By focusing almost exclusively on roads, this misses the opportunity to invest in many high quality smaller schemes that could help the existing roads work better, and contribute to important environmental goals, by cutting overall traffic. The proposals also exclude road maintenance which is desperately in need of more funding.

The minimum project budget should be reduced from £20 million, to allow for smaller schemes to be included, and councils freed to use the funding earmarked for the MRN on vital safety and maintenance, not only new capacity. Having a high lower threshold could perversely lead to council's gold-plating improvements to get them over the bar and eligible for funding.

A package of good maintenance, sustainable design, better integration with other modes, and demand management would help deliver a responsible low carbon future and a range of other Government priority areas such as health and social mobility.

In conclusion, we believe the priorities for MRN funding should be maintenance, including safety measures; integration, with a truly multi-modal approach; and environmental leadership, including a serious commitment to CO2 reduction and demand management, with new road capacity a last resort.

## Core principles

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

The consultation proposes the following core principles:

- Increased Certainty of Funding.

We welcome the allocation of more resources for local transport. The Rees Jeffreys report calling for the creation of a Major Roads Network highlighted the funding gap between SRN and local authority roads. It is right that some of the billions of pounds of public funds currently spent on the Strategic Road Network should be used for the local road network as well.

However, for this funding to be truly effective, the proposed criteria need to be revised to address the main challenges facing the local road network; maintenance, safety and integration.

- A Consistent Network

Greater coordination and management would be welcomed as would moves towards common standards. These standards should cover provision for non-motorised users as well as motorists. Non-motorised users are important customers of the MRN, especially as more of the SRN is upgraded to expressway standard (excluding non-motorised users). Yet provision for these road users can be very variable and is often of poor quality.

- A Co-ordinated Network

We strongly support the principle of a co-ordinated transport network, not a road network in isolation. Solving road problems such as congestion is not always best done by investing in more roads. Focussing on moving people and goods by the most efficient and sustainable means, rather than moving vehicles on roads without reference to other modes, is the best way to deliver a truly co-ordinated network.

It will be important that the needs of buses and coaches are considered fully and any proposals should look at giving them priority to reduce costs and improve service reliability.

- Clear Local, Regional & National Roles

It is sensible to improve co-ordination between local, regional and national bodies, to deliver a truly integrated transport system. Such co-ordination could contribute to providing high quality door-to-door travel, and making best use of technology to join up services and cut congestion.

- A Focus on Enhancement & Major Renewals

We disagree strongly that major renewals should be the priority for the MRN. Road users report that the quality of existing roads is their primary concern, and would prioritise those enhancements that support better use, or reduced environmental impact, of the existing network. Meeting the estimated £12 billion backlog in local roads maintenance should come before adding new road capacity: making the existing network bigger without first addressing maintenance costs will place even more demands on already overstretched local authorities, and lead to an overall worsening of the road network.

- Strengthening Links with the Strategic Roads Network

The priorities for the MRN should not be based solely on the needs of the SRN. Many parts of the proposed MRN are far away from SRN routes and have a distinct role serving diverse parts of the country. MRN investment should move beyond an exclusive focus on roads and seek to improve linkages to major public transport hubs, transport corridors and sources of high travel demand.

Improving the MRN for buses, coaches, walking and cycling will help reduce traffic and therefore the pressure on the SRN.

## **Defining the network**

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

We strongly disagree with the approach being placed on vehicle movements, as calculated by Average Annual Daily Flow (AADF), alone. We note that the emphasis is on defining roads that are important to the economy. However, by focussing on traffic flow alone, the strategy is likely to miss roads that carry far greater numbers of people and therefore economically important, despite having a lower traffic flow. This is particularly true of routes into and within urban areas where there is much greater use of buses, cycling, parallel rail routes and car sharing.

Instead we advise that measurement should be done based on movements of people and freight, across all modes on the road corridor in question. Otherwise the funding risks being a reward for failure by steering funding to poorly managed roads that do not make good provision for integrated transport and compounding that failure by restricting the funds from being spent on better integration in future. Private motoring is an inefficient user of available road space, which in towns and cities can be a constrained resource. Reducing road traffic from private motoring frees up road space for more efficient modes of transport and consequently boosts the local economy as well as bringing other benefits such as reduced air pollution and fitter and happier population.

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

We welcome the principle of using qualitative as well as quantitative criteria, and note the qualitative criteria proposed in the consultation document:

- Ensuring a coherent network
- Linking Economic Centres
- Access to / resilience for the SRN.

We support the principle of ensuring a coherent network: however, an exclusive focus on roads is unhelpful in providing an overall integrated transport package, which would be the best route to address the transport needs of different locations.

A continued focus on new road capacity will take resource away from maintenance and will only serve to generate more traffic, leading to more congestion and less reliability in future. Expanding the network will also increase the long-term maintenance costs, further exacerbating the current situation.

Road transport is only one option for linking centres and moving people and goods, and alternative modes from rail freight to bus routes will often be more efficient and less damaging, yet are all too often excluded from funding, despite having a positive impact on the capacity and resilience of the road network. The best approach for MRN investment would be to identify corridors of importance and then determine the best way of serving these, recognising that this may be through local small-scale interventions alongside larger infrastructure projects.

Focusing investment on road-based criteria alone risks neglecting other areas that are economically important, while providing new road capacity in isolation risks further increasing traffic and congestion off the network and on other parts of the network.

We understand the importance of having a resilient road network at both SRN and MRN level. Any investment in the network should embrace measures to improve its resilience not simply in terms of capacity and diversionary routes, but also in environmental resilience. Climate change is a threat to us all, including the operation and maintenance of the road network. Large cuts in transport emissions of carbon dioxide are essential if the UK is to meet its climate change targets and this would also help address the challenges of congestion, air quality and road maintenance. Retrofitting existing roads to be flood resilient should be a priority, ahead of new road construction.

Committing to a fix it first approach, prioritising green retrofit and ongoing maintenance ahead of new roads, is the best option to deliver a resilient road network for the future.

**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?**

The key point is how such roads are managed and what the priorities are within the investment programme, not the designation of individual roads. The MRN should be planned and managed as part of an integrated, multi-modal transport network, rather than in isolation.

Inclusion in the MRN should not necessarily mean increasing capacity but should ensure standards of safety, maintenance and high-quality design, including environmental retrofit, recognising the adverse impact that major roads have on the environment.

Given its location close to the South Downs National Park, the failure of the Chichester bypass plans and controversy over plans for the Arundel section, and the alternative options to deliver transport capacity through public transport improvements, there is a case for removing the A27 from the SRN and treating it as part of the MRN instead.

**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?**

See our answer to Q4 above. We are also concerned at the plethora of MRN routes that pass through National Parks and AONBs and risk further undermining the special purposes of these areas.

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

We support proposals for a planned review of the MRN and would like to see this include environmental impacts, impact on communities and usage by non-motorised users as well as levels of use by motorists.

We commend to DfT the proposed metrics for RIS2 in our report "Rising to the Challenge" which could be applied to the MRN as well as to the SRN.

**Investment planning**

**Q7. To what extent do you agree or disagree with the roles outlined in the consultation document for local, regional and national bodies?**

It is sensible to encourage local and regional bodies to work together identifying investment priorities for strategic corridors. However, it is vital that this is on a multi-modal basis, enabling decisions on integrated packages, not road investment in isolation. All tiers should ensure that their proposed solutions contribute to enabling the UK Government to meet its national and international obligations on CO2 reduction and improvements to air quality.

Without freeing local and regional bodies to invest in non-road solutions to address challenges facing the road network, there is a real risk that MRN funding will distort transport investment, contrary to the Government's aims for rebalancing the economy and benefitting all regions.

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

We urge that MRN investment should be directed to integrated packages where these are the best solution to road network problems. At local level, this means joining up with LCWIPs, bus provision, clean air zones, and transport-led development. At local and regional level, this means joining up with devolved rail and light rail planning, and provision of strategic multimodal interchanges.

**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?**

The devolution agenda and sub-national groupings are evolving: the MRN should be flexible enough to be accessible to whatever structures emerge in different parts of the country rather than prescribing top-down which groupings should apply. For example, Cornwall has a strong case for being treated as a single entity for MRN purposes, while small districts in Suffolk would be expected to collaborate.

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

There is an urgent need to meet CO2 reduction targets to avoid catastrophic climate change impacts. The UK CCC sets targets for traffic reduction as part of the minimum changes needed to meet CO2 budgets that are already off track. Growing numbers of local authorities are legally required to take action to improve air quality, for which cutting levels of traffic is the most effective intervention. The regional evidence bases should be required to demonstrate how MRN investment will contribute to reducing CO2 emissions and delivering improved air quality.

We welcome the potential for smart technology to improve integration with local transport systems for smarter traffic management and journey planning. We look to the regional evidence bases to contribute to data sharing, supporting the wider connectivity benefits of information and communications technology, including reducing the need to travel.

Regional evidence bases should show an integrated approach that addresses the aims of the Government's other strategies, including policies in support of rail re-openings, greater use of rail freight, enhanced bus services, and a significant increase in walking and cycling.

Critical trends such as the growth in online commerce, remote and flexible working, and falling car ownership should also be considered in making the case for MRN investment.

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

It makes sense to co-ordinate MRN investment with the wider RIS2 programme as well as local multi-modal packages, to help deliver an integrated network. Highways England (HE) has great capacity and expertise for major road building: however, HE will not always have the appropriate design expertise to deliver smaller, multi-modal schemes that may be more appropriate for solving local transport challenges.

In addition to the technical support proposed in the consultation document, Highways England is best-placed to manage junctions, lighting, and litter collection at all SRN/MRN interchanges, and that would contribute to the aim of having a consistent network.

We would like to see MRN roads having the opportunity to benefit from a similar set-up to the HE Designated Funds, in addition to MRN funding, to deliver high quality environmental and integration enhancements, to tackle existing issues for local communities.

**Eligibility and investment criteria**

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

We strongly disagree with the £20 million minimum cost threshold. This will exclude many smaller schemes that have potential to deliver excellent value for money, and by limiting the total number of schemes that could benefit, means that many areas of the country will miss out, contrary to the policy aim of rebalancing investment. It also risks encouraging scheme promoters to over-specify their schemes to qualify. This is the opposite of a sustainable or responsible approach.

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

The consultation document proposes that 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.

We are concerned by the fresh emphasis on bypasses and missing road links as the solution to the challenges facing the road network. There is a wealth of evidence from past schemes that expanding road capacity generates increased traffic: it provides at best only a temporary relief from congestion at one location but adds to traffic levels on the wider network. Instead bids should be judged on their merits and their success in moving more people more efficiently, not vehicles.

Investments in signage, traffic management and the use of smart technology and data, are welcome, and represent a much better investment in a resilient future network than laying more tarmac would do.

We strongly support investment in packages of improvements provided such packages are truly multi-modal, integrated with wider transport and land use planning, and contribute to important environmental as well as social and economic goals.

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

The consultation document identifies the following investment criteria:

- Reduce Congestion
- Support Economic Growth & Rebalancing
- Support Housing Delivery
- Supporting All Road Users
- Support the SRN

Tackling congestion is a sensible priority: measures to address congestion should include reallocation of road space to prioritise the more efficient users of road space and promote better integration with public transport.

To best deliver economic growth and rebalancing, the funding delivered through the MRN should be available for a wider range of projects, including integrated transport packages. Such packages will be more effective than road building alone in supporting access to commerce and employment in urban centres, addressing social mobility 'cold spots' that are often poorly served by public transport, and supporting upgrades to local and regional public transport networks, where these are the best ways to improve connectivity and economic activity.

We recognise the importance of providing new homes, with housing development focussed on major public transport corridors (rail or bus), to minimise growth in road traffic. The Major Roads Network should not be used to stimulate housing developments in unsustainable locations. Instead transport investment policy should support the goals of the revised NPPF, which *"recognises the importance of making the most of existing spaces, making clear that plans should seek more intensive use of existing land and buildings and include minimum density standards in town and city centres and around transport hubs."*

We strongly support measures to support all road users, including pedestrians, cyclists, equestrians and bus passengers, as well as motorists and freight operators. Unlike much of the SRN, the MRN represents key routes for cycling, and this is likely to increase as cyclists become excluded from SRN expressways: yet much of the A road network is not fit for cycling provision due to its width and traffic conditions. There would be real benefits from a MRN programme to upgrade cycle provision to IAN standards and to link up with existing cycle routes, including co-ordinating with emerging LCWIPs.

We are concerned that the MRN consultation document appears to ignore bus users who are an important group of road users. The best way to support all road users is to focus on moving people and goods rather than moving vehicles. This will only be delivered in practice if the criteria for MRN funding can be revised to include truly multi-modal schemes.

We do not agree that the purpose of the MRN should necessarily be on improving flows between the SRN and MRN and providing resilience to the SRN during planning closures. Communities affected by increased overflow traffic from the SRN will not experience this as an improvement to their local network, nor will this help cut noise or air pollution. Instead, MRN investment should move beyond an exclusive focus on roads and seek to improve linkages to major public transport hubs, transport corridors and sources of high travel demand. By contributing to a more integrated transport system and reducing traffic levels on the road network as a whole, MRN investment could improve the performance of the SRN in a positive way.

**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 are concerned that the current criteria, combined with the minimum £20 million threshold, will lead to a focus on major road schemes. This misses the opportunity to invest in many high quality smaller schemes that could help the existing roads work better, and contribute to important environmental goals, by cutting overall traffic.

We are concerned that public transport enhancements are to be excluded from MRN funding unless they come with more road building: this is a missed opportunity to deliver non-road schemes that will relieve pressure on the MRN. Such schemes benefit all road users. For example, one double decker bus can replace up to 75 cars on the road, while multi-modal freight interchanges such as the Daventry strategic rail freight interchange can remove 64 million miles of lorry journeys from UK roads.

The proposals also exclude road maintenance which is desperately in need of more funding: local authorities and the industry report a £12 billion maintenance backlog. By expanding the size of the local road network without first funding the necessary maintenance of the existing network risks creating a negative cycle of declining road quality and an unsustainable financial burden on local highway authorities.

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.

**Other considerations**

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

The MRN should be part of a truly integrated transport strategy that seeks to deliver 'good growth' by following the smarter travel hierarchy: reduce demand, widen travel choice, maximise efficiency, and make new road capacity a last resort.

MRN investment criteria should follow an integrated approach to option appraisal on congested corridors, rather than consider road schemes in isolation, and have an explicit remit to improve integration with public transport as part of a multi modal approach.

Future investment in road schemes should focus on establishing a safe, well-maintained and smart road network, rather than growing capacity, with budget allocations to match this priority. We urge that the MRN programme, alongside RIS2, is subject to a Strategic Environmental Assessment (SEA) to help steer this major transport investment programme onto a truly sustainable trajectory.

In conclusion, we believe the priorities for MRN funding should be maintenance, including safety measures; integration, with a truly multi-modal approach; and environmental leadership, including a serious commitment to CO2 reduction and demand management, with new road capacity a last resort.

March 2018

Bridget Fox  
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

16 Waterside, 44-48 Wharf Road, London N1 7UX  
Registered Charity 1101929. Company limited by guarantee, registered in England and Wales: 4943428