



# URBAN TRANSPORT GROUP

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Consultation response

## Proposals for the creation of a Major Road Network

Department for Transport

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## 1. Introduction

- 1.1. The Urban Transport Group (UTG) represents the seven largest city region strategic transport bodies in England, which, between them, serve over twenty million people in Greater Manchester (Transport for Greater Manchester), London (Transport for London), the Liverpool City region (Merseytravel), Tyne and Wear (NEXUS), the Sheffield City region (South Yorkshire Passenger Transport Executive), the West Midlands (Transport for West Midlands) and West Yorkshire (West Yorkshire Combined Authority).
- 1.2. This response was drawn up in consultation with the City Region Strategic Highways Group which draws on representation from across Districts and city region wide bodies in the areas that UTG serves.
- 1.3. Following on from the Rees Jeffreys report in October 2016, UTG acknowledged the benefits of developing this concept into a wider Major Road Network (MRN) proposition for England. The Urban Transport Group therefore supports the principle of developing the MRN (and an associated funding stream) for the country as whole.
- 1.4. As key partners of the Sub national Transport Bodies (STBs), UTG members recognise and would like to highlight the importance of the strategic and local network in major cities to the national economy, and the role it could play in unlocking employment and housing growth.

*The Key Principles which inform this response are:*

- 1.5. We support the need to establish a MRN network of regionally important roads. The MRN should form part of a wider interlocking hierarchy consisting of a national Strategic Highways Network (SHN), important City region Key Route Networks and local urban and rural roads, which are all part of an overall world class national transport system which achieves sustainable, inclusive growth for the UK.
- 1.6. Outcomes for the MRN should be aimed at the effective movement of people and goods with improved reliability and resilience and an improved environment, not just solely on congestion reduction. The MRN must also be fit for purpose – putting service for its users, adhering to established local transport policies and the wider needs of communities and the environment.
- 1.7. It should be recognised this will mean road links which provide a reliable and multi modal service including public transport services and high quality conditions for walking and cycling – reflecting the importance of a healthier, cleaner and safer environment.
- 1.8. Long term, stable funding is welcomed for the MRN but it must include investment in public transport, technology, cycling and walking.
- 1.9. Technology is driving change across the transport network and it is felt this should be acknowledged as part of the MRN. Technology and future proofing could drive improvements in reliability and efficiency on the MRN.
- 1.10. Consideration should also be given to five year funding allocations for roads investment - covering RIS2, New Roads Fund, ITB, NPIF, Transforming Cities Fund, Highways Maintenance Block and Local Major Schemes to Combined Authorities.



- 1.11. Absolutely critical is that this network of regionally important roads is planned and operated by the appropriate form of Governance, and that in city regions, this means that city region authorities have primacy in planning and prioritisation of schemes.
- 1.12. The design standards and form of urban links of the MRN will be different to inter-urban links of the MRN and this should be explicitly set out and supported in MRN strategy and funding bid processes.

## 2. Response

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

The need for a MRN was identified in the Rees Jeffreys report and we support this concept. UTG members have been working closely with the STBs to develop an MRN network that supports the city regions wider environmental and economic objectives and which identifies appropriate priorities for investment.

We welcome the principle of increased certainty of funding for the MRN and specific allocations for city regions should be considered which reflect the greater challenges that can exist in city regions in relation to congestion, air quality and the multiple roles of major roads in urban areas.

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

The consultation quantitative criteria are a good fit with the work that the various STBs and its city region partners have undertaken, in advance of the DfT consultation.

However, UTG would like to highlight that on many of the MRN links within city regions areas, the movement of people - in the most efficient and effective way - is the key priority for Authorities. There are also critical issues around air quality, improving urban realm, reducing the severance of communities that busy urban highways can cause and improving access to opportunity.

Prioritising improving capacity into urban centres for single occupancy vehicles also risks creating significant problems at a time when many urban centres are actively reducing the space available for cars in line with the priorities set out above. This is why the MRN in urban areas should also encompass approaches which allow for better public transport, active travel and traffic restraint.

The focus should not always be on the volume movement of vehicles.

We agree that any definition must make the best use of local and regional knowledge to ensure that the most economically important roads are captured.

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

The principles behind the qualitative criteria are sound, but in applying them to the development of MRN networks in individual areas, they could benefit from more detailed guidance on their application. This may include greater emphasis on their role in providing



better connectivity to economic centres and their role in supporting development opportunities such as housing sites as well as, in some cases, providing greater resilience in support of the SRN during major incidents and events.

#### **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?**

There are still a number of key strategic links missing in many city region areas. The DfT should work closely with these authorities and the STBs to develop a Network that matches local needs and benefits city region areas.

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

In response to questions 4 and 5, individual city regions and STBs have identified a number of proposed deletions and additions to the proposition within the consultation document.

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

UTG supports future reviews of the MRN. This will be particularly important in where major housing and employment sites become more certain over time, and in relation to the construction / completion of other new highway schemes.

In designating the MRN we think it should consider schemes that are approved or under construction, as these may be a reason for changes to the current network (in terms of MRN definition) on completion of committed schemes.

Similarly, if there are housing or employment sites currently under construction then it would be logical to include any forecast changes in traffic flow associated with such developments within the baseline MRN at the start of that five-year period.

Failure to adequately consider certain development or schemes could constrain the most appropriate MRN solution of any given region or area.

#### *Investment Planning*

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

UTG agrees with the principles behind the roles outlined in the consultation document for local and regional bodies including a possible role for STBs in coordinating programmes. Where funding programme decisions and approvals are made by STBs - these should be based on having the gained the approval of the city regions in the areas covered by those STBs.

Furthermore, a robust monitoring framework should be in place to oversee the role and performance of STBs.

UTG agrees that Local Highway Authorities should retain responsibility for maintaining and operating their existing networks; STBs or Highways England should not intervene in the day-to-day running of local roads.

To support the objective around supporting and rebalancing the economy, the role of Local Enterprise Partnerships should be clarified in the proposals. The consultation notes that the



aspiration is for LEPs and Local Authorities to work together, this is recognised. LEP's can have a broader role in defining current and future business trends, the growth that comes with that and some of the high-level opportunities for development.

This role of the LEP includes working with their Combined Authority and Local Authority partners.

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

UTG supports long term funding programmes for transport as this leads to greater efficiencies and certainty. We therefore support a five year investment period for the MRN which would also map onto the RIS process for national roads.

It is felt that Mayoral Combined Authorities and Combined Authorities (on behalf of their constituent district authorities) are best placed to align funding streams, ensuring that overall best value is secured. This would support city regions in developing long term investment and maintenance plans for urban sections of the MRN.

The Mayoral Combined Authorities and Combined Authorities are already allocated ITB, HMF, Pot Hole Action Fund, NPIF and Transforming Cities Fund to develop and deliver schemes, in line with wider Devolution Deal agreements. This process should continue. Any changes would not benefit current scheme development and would lead to slower scheme delivery.

**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?**

No comments.

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

Greater emphasis should be given to the role of MRN investment in unlocking economic growth and housing, and the investment prioritisation process should be designed to encourage the promotion of schemes that are particularly central to the region's economic priorities.

We also recommend that greater focus is given to improving air quality, managing long term resilience of the network, and mitigating negative health impacts that the MRN may have (in line with the objectives set out for RIS2).

A useful example of a balanced approach is in Greater Manchester and their "Streets for All" approach to the highway network. The draft Streets for All document, covers all modes but has a clear focus on multi-modal services and improving 'place'. This will ensure that the highway infrastructure and capacity is available to support/open up new development.

The approach in Greater Manchester and other city regions is on the movement of people rather than just vehicles.

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

UTG supports Highways England providing a role in, where beneficial:



- *Programming support*; utilising long term expertise;
- *Analytical support*; building on the current RIS process;
- *Cost estimate support*; building on the current RIS process but understanding the differences in design standards that the MRN will have compared to the SRN; and
- *Delivery support*; it is felt that this should not be to the detriment of the committed RIS1 delivery programme and planned programme for RIS2.

### *Eligibility & Investment Assessment*

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

Whilst we understand the rationale for the cost thresholds there is a risk, as with any arbitrary threshold, that an intervention could have a very strong business case but beneath the level to be considered.

Furthermore, recent RIS1, future RIS2 and Large Major schemes in many city region areas that may have suitably matched the criteria for MRN funding, would have been discounted from MRN funding based on their average cost.

The current funding eligibility criteria would not have funded the schemes outlined. Therefore, we question whether the thresholds proposed in the consultation are realistic.

UTG would welcome the eligibility of 'packages', which to some extent may mitigate against the above, but nonetheless scope for discretionary decisions on a case by case basis would strengthen the criteria.

The consultation does not fully consider the asset management of the network. If the network is to be maintained to a differing standard to current LA practices any residual cost should not impact on the funding available to maintain other LA roads. In essence major renewals and asset management should be available through the National Roads Fund.

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

UTG support the eligibility criteria but greater clarity is needed on the eligibility of public transport and non-motorised improvements, as many MRN corridors have multiple roles (for example as major bus corridors, active travel routes or as shopping and residential centres), and this needs to be taken into account in any future guidance. In addition, thought needs to be given to the potential of technological innovation to contribute to objectives for the MRN and to ensuring the network is future-proofed.

Where the MRN extends into urban areas, then one of the most effective measures for reducing congestion and improving the movement of goods and people overall could be supporting public transport, walking and cycling and technological innovation with complementary local policies to reduce travel demand. Additional funding for maintenance programmes may also generate increased performance benefits on the MRN and should be considered.

The MRN needs to be capable of being developed in locally appropriate ways in urban areas which, to reflect its differing role to the SRN, and its impact on the residential and commercial



areas it passes through and the wider role it performs in relation to public transport and the promotion of active travel

An additional eligibility criteria should be: 'Scheme delivered in an area with air quality issues as identified by the 2017 UK Plan for tackling roadside nitrogen dioxide concentrations and will lead to a demonstrable improvement in roadside air quality'. This would demonstrate joined up thinking within Government. Air Quality is identified as an investment assessment criteria but should also be an eligibility criteria.

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

We recommend that the investment criteria are reviewed and re-ordered to avoid what could be interpreted as a disproportionate bias towards reducing traffic congestion per se. This objective should also be widened to cover both the SRN and MRN.

Investment funding should also be targeted at improving the performance on the MRN. This would ensure secondary benefits to the SRN - through a shift of traffic to alternative routes (alongside wider resilience benefits) or to alternatives to using the MRN. Reducing congestion will be part of the package of measures to ensure an effective MRN and SRN.

The investment criteria should include objectives and criteria which reflect the challenges and needs urban areas are facing. Space can be limited with high demand for people and goods movements and it is essential to focus on making better use of road space and encouraging modal shift away from cars towards sustainable modes of transport.

#### **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 recommend that the investment criteria are reviewed to reflect major cities' priorities and thought is required on how improved collaboration between stakeholders is achieved. In addition thought is needed around how the criteria link to wider Government priorities, including air quality.

In developing the guidance for the funding application process, it will be important to consider how these investment criteria are both weighted and assessed.

#### *Other Considerations*

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

Consideration should be given to five-year funding allocations for roads investment – covering RIS2, New Roads funding, ITB, NPIF, Transforming Cities Fund, Highways Maintenance Block and Local Major Schemes to the Combined Authorities. This would link to the wider RIS process.

The Mayoral CA's and CA's are the best placed Authorities to align the current funding streams together, ensuring that best value is secured to improve the urban sections of the MRN.