

PROPOSALS FOR THE CREATION OF A MAJOR ROAD NETWORK

Transport for the North response to the
Department for Transport consultation - March
2018



General Comments

Transport for the North (TfN) welcomes the opportunity to comment on the Department for Transport's (DfT) proposals for the Creation of a Major Road Network.

Overall it is encouraging that the consultation document recognises the importance of major local roads in facilitating the efficient and reliable movement of people and goods, supporting transport connections to important centres of economic activity.

Fundamentally we believe that the Major Road Network (MRN) should be viewed as a seamless network of roads, encompassing both the Strategic Road Network (SRN) and economically important locally managed roads. So that although operated separately by Highways England and Local Authorities; evidence gathering, network planning, the provision of customer journey information, traffic and performance management decisions are developed collaboratively taking a holistic view of the whole MRN.

The Transport for the North (TfN) Major Roads Report agreed by TfN's Partnership Board in September 2017 forms a key part of the evidence base for TfN's Strategic Transport Plan launched for public consultation on 17th January 2018. See: <https://transportfornorth.com/reports/>

Developed collaboratively with TfN's Partners the Major Roads Report identifies a MRN for the North.

With our Partners, TfN has defined the MRN for the North, as the network which links the North's Important Economic Centres, including 'first and last miles' from the SRN.

Where the North's Important Economic Centres (IECs) are:-

- Ports and airports; supporting imports, exports and the visitor economy.
- Northern Powerhouse Independent Economic Review (NPIER) industry clusters and enabling capabilities for the NPIER economy.
- Major population centres, generally over 50,000 residents.
- Enterprise zones, universities and other key employment sites.
- Major centres of tourism.

Central to TfN's vision is a resilient MRN for the North that offers improved multi-modal options, and more reliable journey times, linked seamlessly to local networks and the Important Economic Centres critical to achieving transformational Economic Growth.

In summary the **MRN for the North, is "the road network that is most economically important to securing the North's productivity and growth; both now, and in the future."**

And within the context of TfN's multi-modal transport ambitions, as set out in the Strategic Transport Plan, TfN is working with Partners, including Highways

England, to identify the connectivity priorities that support transformational growth in the northern economy.

This response to the DfT's proposals for the Creation of a Major Road Network is therefore within the context of the MRN for the North, agreed by TfN's Partnership Board in 2017, and which is published within TfN's Draft Strategic Transport Plan, currently out for public consultation.

Response to consultation questions

Core Principles

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

TfN broadly supports the five proposed core principles, although we suggest that there should be specific acknowledgement of the importance of supporting freight movements including to international gateways, and of achieving improved multimodal opportunities for passengers and freight.

We welcome the recognition of the need for increased certainty of funding, and firmly believe that extending this approach to provide more certainty on funding over longer periods than five years suggested in the consultation document will reap major benefits including providing greater certainty on planning for a pipeline of transport improvements, generating efficiencies by allowing the supply chain to plan for the delivery of projects and building business confidence in our nation as place to invest and grow.

We strongly advocate the role of STBs in developing and agreeing the MRN at the sub regional level, and where STBs do not exist, we support allowing regional groupings to fulfil that role.

As described in the introduction, whilst we acknowledge that there will be separate funding mechanisms for the SRN and major roads managed locally, we believe the MRN should be viewed as one network. That is a seamless network of economically important roads, encompassing both the SRN and important locally managed roads. Safe, efficient and reliable end to end journeys are what matter to users. It is that seamless network that can make all the difference as to whether goods or people arrive in time, or as efficiently as possible.

Defining the MRN

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

The MRN for the North agreed by our Partnership Board in 2017, and developed collaboratively with our constituent Partners, is based on ensuring strong connectivity to the North's Important Economic Centres (IECs).

This is the network that is most economically functional to securing the North's productivity and growth; both now, and in the future.

The MRN for the North connects 198 (IECs), including towns, cities, ports, airports, enterprise zones, universities and other key employment sites. General principles for identifying the IECs include:

- Current economic centres - generally have a population of >50,000 people (or perform a strong sub-regional function, e.g. Northallerton), represent a regionally important international gateway for people or goods (e.g. Newcastle International Airport or Port of Workington) or employment cluster (e.g. Wilton International, Redcar) or university located external to a major settlement (e.g. University of Lancaster)
- Future economic growth locations - key growth centres in local Strategic Economic Plans and Local City Region Strategies, especially linked to the NPIER sectors that deliver a number of jobs/dwellings which will have a significant impact on the economy when considered at the level of the North.

Importantly, although we considered the Rees Jeffrey's study approach to defining an MRN, using Annual Average Daily Flow (AADF) traffic flow metrics, the view taken by TfN and our Partners is that the MRN should be focused on supporting economic outcomes through supporting good road connectivity to important economic assets across the North, and that using traffic flow as a quantitative metric fails to take account of the differing economic geographies across the North. Use of current traffic flows will fail to account for the impact of poor connectivity constraining the movement of people and goods, and also exclude routes to major new development or links to important new transport interchanges, for example Parkway Stations and Intermodal Freight Hubs.

We also note that the consultation document does not specify what AADF thresholds the DfT has used to generate the indicative MRN, presented in the consultation document. We can foresee the use of an AADF metric potentially giving rise to an incentive to increase traffic flows on certain routes close to the threshold value, rather than focus on the important outcomes including safety, journey quality, efficiency, reliability and resilience of the MRN. Too much emphasis on AADF could also result in the inclusion of a large number of urban roads as these generally tend to have the highest traffic flows, with the exclusion of some important pan northern routes with AADF below the threshold value.

We suggest that there is no need to make special reference to de-trunked roads, where they meet the MRN criteria they should be included, if they do not, then they should not form part of the MRN.

A further important point is how far the MRN extends into towns and cities, we believe should be a matter for Local Transport Authorities. In defining the MRN for the North, TfN worked with Partners to identify and agree the MRN, for example where roads serve multiple purposes and there are several options for selecting a radial route into a city centre, or where the MRN network should terminate, for example at an inner city or town centre ring road.

TfN would support a quantitative metric based on identifying Important Economic Centres, but does not support an approach to defining the MRN which is primarily based on AADF.

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

We support the statement that *'The MRN cannot be defined by quantitative criteria alone. This would fail to recognise local and regional characteristics and would produce a series of fragmented road links across the country.'*

We strongly agree that the MRN needs to be a coherent network, that is both linking the IECs across the country and ensuring consistency across boundaries. It is this coherent network of Major Roads that will support the success of the UK's Industrial Strategy which depends upon re-balancing the economy and transforming the economic performance of the North of England.

Ensuring a Coherent Network is presented as the first of three qualitative criteria, but is more of a methodological requirement resulting from the use of AADF as the primary metric for defining the MRN. As described previously an MRN based on connectivity to IECs, would avoid the requirement for a 'work - around' solution where sections of road fall below the AADF threshold.

As we have already advocated we believe that MRN should link *Economic Centres*, and have defined the MRN for the North on that basis, using an agreed set of criteria, as described in our response to point 2.

Access to/Resilience for the SRN is essential to the performance of our economy, which is why we view the MRN for the North as a single network, comprising of the SRN plus those important locally managed roads providing access to/from the SRN and resilience when planned works and unplanned incidents occur on the network. Evidence from TfN's engagement with the private sector has strongly underlined the importance of ensuring we have a transport network that is both reliable and resilient throughout the year. Where for example the impacts of severe weather and/or seasonal increases in traffic are better understood and managed.

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?*

No, there are substantial sections of the MRN for the North missing from the indicative plan presented in the consultation document. The plan also omits to show where the indicative MRN would link to important routes in Scotland and Wales.

The MRN for the North accounts for 7% of the road network in the North, that is the SRN (2%), plus a further 5% of roads. It is this network TfN agreed with Partners in 2017.

Key connections missing from the proposed MRN

- A. Some of our defined IECs are completely isolated from the proposed MRN, which goes against the objective of supporting growth eg North East Ports, (Port of Tyne, Port of Sunderland, Port of Blyth etc..), City of Sunderland, Northallerton, Whitby, Windermere.

This suggests that the following routes/links should be included: -

- A690 & A1018 connecting Port of Sunderland to the A19 (SRN)
- A168 & A167 connecting the County Town of Northallerton to the A19 near Thirsk and to the A66 south of Darlington.
- A171 linking Middlesbrough and Tees Valley with Whitby and Scarborough. Including links to North York Moors National Park, Boulby Potash and Sirius Minerals Polyhalite mine near Whitby (the largest and highest grade Polyhalite deposit in the world).
- A591 connecting Kendal to Windermere, Keswick and the A66.

- B. Some IECs are connected to the MRN, but only by one proposed route, which therefore does not provide for a resilient connection for these IECs, eg Hull, Hartlepool, Redcar, Blackburn, Lancaster. This suggests that the following routes/links should be included: -

- A666 connecting Blackburn (including Samlesbury Aerospace Enterprise Zone) to the M61 and Greater Manchester.
- A595 from Dove Ford to Barrow and Port of Barrow
- A595 between Carlisle and A66 (near Cockermouth)
- A689 between A69 and the M6 Junction 44
- A179 linking Hartlepool to the A19
- A66 east of Grangetown (Middlesbrough) to Redcar and Teesport
- A1079 to Hull

- C. Alternative routes to the SRN that also perform an important current/future role in supporting IER capabilities and in linking the SRN to Scotland and Wales These include the following roads, which are excluded from the indicative MRN:

- A68 & A697 north-south connections from Newcastle and Northumberland to Scotland and Edinburgh. Both alternatives to the A1 and the A68 providing access to Kielder Forest and Northumberland National Park
- A59 connecting to Skipton to Harrogate and onto the A1(M). This is also part of an east-west route linking North & West Yorkshire to East Lancashire.
- A534 connecting Crewe (including the HS2 Station) to Wrexham in North Wales
- A34 connecting East Cheshire to the M60 and Greater Manchester Life Sciences facility at Alderley Park
- A54 connecting East and West Cheshire

This is not an exhaustive list, and following the outcome of the consultation TfN commits to working with the DfT to ensure that the MRN routes agreed by TfN and Partners in the North are included within the MRN for England.

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

As noted in our response to point 2 the blanket inclusion of all de-trunked roads may have led to inappropriate inclusions across the country.

We are aware that some of our TfN Partners plan to express their view on the de-trunked routes that they would or would not wish to see included within the MRN, and anticipate that they will highlight those routes in their response to the MRN consultation.

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

We agree that a five-year cycle for reviewing the MRN is appropriate. As we have stated we view the MRN as a single network that includes the SRN and important local roads. Therefore, we would expect the MRN review to be a collaborative exercise encompassing the SRN.

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

We welcome the proposal that STBs, where they exist, are best placed to carry out the strategic role in planning for the improvement and enhancement of the MRN, in conjunction with partners.

Indeed, TfN and its Partners have already made representation to Highways England and the DfT as to what the North believes is an appropriate set of interventions across both the SRN and the MRN for the period between 2020 and 2025, and an indicative list for 2025-35. The estimated cost of these interventions strikes an appropriate balance between the likely level of funding available for the MRN and the stated objective to rebalance the UK economy. We look forward to a positive response on these recommendations when the Secretary of State announces an initial package of works on the MRN later in 2018.

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

We support the proposed balance of responsibilities, though we would like to see further information and clarity on the DfT's role in assessing and prioritising investment based upon the Regional Evidence Bases.

We strongly welcome the recognition that STBs are best placed to work together with Highways England, Local Transport Authorities and LEPs in developing a robust evidence base to underpin investment planning. We believe that STBs should lead this process, subject only to guidance from the DfT, and that here there is an important opportunity for STBs and Partners to develop more innovative approaches to delivering an MRN that both supports existing economic activity and facilitates greater productivity and growth

Gathering of a robust evidence base will entail additional work for STBs and local Partners and we anticipate that the DfT will provide appropriate levels of funding support to the preparation and ongoing operation of a Regional Evidence Base, including the collection of robust performance data. For example, on journey times, reliability, resilience and customer perception of the MRN. Key to greater efficient use of the existing network will be the availability of real-time travel information which will enable road users to make better informed choices on when and how to make their journeys.

The shared DfT and STBs responsibility for updating the Programme and Evidence Bases every two years should be adapted to ensure the process is aligned with the five-year 'plus' cycle for the MRN and SRN as a whole.

As stressed in our response to Q1, we would like to see greater visibility and certainty of likely funding levels for the MRN running beyond the next five-year planning period. And to work with the DfT and Highways England on long term planning for the National Roads Fund, having a say on the approach to future funding and distribution between the SRN and the MRN.

We welcome the proposed flexibility for regions to design and manage the process of submitting schemes for consideration by the DfT.

TfN is already leading the way on working with our Partners to develop a long-term transport investment programme, underpinned by a robust pan-northern evidence base and developed further through work on producing Strategic Outline Programmes and business cases for investment in seven strategic corridors across the North of England. This work will identify and sequence interventions over the short (2020-2025), medium (2025-2035) and long term (post 2035).

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?

TfN's response to this question is limited to seeking assurance that arrangements for managing the development of the MRN in non-STB areas take full account of the impacts on neighbouring STBs. This includes

arrangements for agreement with the Welsh and Scottish Governments, where MRN routes cross national boundaries.

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

We strongly advocate the importance in ensuring that the Regional Evidence Base encompasses the role of the SRN, as part of the MRN, and that it is forward looking, outcome based and aligned to national and regional strategies, in particular in the North to the TfN Strategic Transport Plan.

As set out in our Draft Strategic Transport Plan, TfN is taking a long term approach to identifying transport interventions; building a programme level strategic case for investment, and utilising a common analytical framework, including use of the Regional Traffic Models, a Northern Rail Model and Great Britain Freight Model to better understand and appraise the cumulative effects of transport schemes, on the economy and on performance of road and rail networks.

TfN therefore seeks assurance that in assessing evidence the DfT will take a long-term programme level approach, taking account of spatial development plans, for example Strategic Housing Sites, and considering wider economic benefits and transformational growth, so that cumulative impacts of investment on the MRN (and in other modes, e.g. HS2 and Northern Powerhouse Rail) are included within the assessment.

We agree with the proposal to consider a degree of over programming of schemes, and recommend that schemes are sequenced over at least a 15-year rolling programme, providing a pipeline of schemes and greater certainty to the supply chain and business investors.

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

We support an active role for Highways England in the MRN Programme, and would expect that for some schemes STBs will share the client role with Highways England. Both STBs and Highways England will need to be sufficiently resourced and skilled for this role.

As noted earlier, priorities for the MRN must take full account of plans in the RIS for the Highways England network.

12. Do you agree with the cost thresholds outlined?

We disagree with both the lower and upper cost thresholds proposed in the consultation.

Up to £20M is high for many of the smaller Local Authorities, given the constraints on what they or the Combined Authority / Local Enterprise Partnership might be in a position to fund. Although we support the

opportunity to fund a package of interventions along a corridor or route, where the package as a whole has a coherent strategic case.

The expectation that most schemes would not exceed £50M, with a maximum limit of £100M is too low. For example, a number of the current Large Local Major Schemes in the North have a cost in excess of £100M

13. Do you agree with the eligibility criteria outlined?

We support the types of schemes listed in the consultation as eligible for funding. Though as outlined in the response to Q8 we strongly advocate the concept of an evidence based and outcome driven long term (10 – 15yrs) programme approach to developing schemes. This should support significant schemes, but should also allow the option of funding smaller scale interventions as part of a package if they are value for money and evidenced to have a significant impact on improving performance and outcomes.

We do not support the exclusion of public transport enhancements, as opportunities to maximise the benefits of multimodal links, particularly to HS2 and Northern Powerhouse Rail should be in scope for funding.

We support the exclusion of roads which are not on the MRN, with the allowance for the construction of new roads, which once completed would be integrated into the MRN.

We agree that bids for non- specific Local Authority wide packages to cover general improvement of all MRN roads in an area should not be considered. Also, that other than by rare exception, schemes on the SRN should be funded through the Roads Investment Strategy (RIS) programme and not the funding set aside for important local roads identified as part of the MRN.

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

We strongly support the investment criteria 'Support Economic Growth & Rebalancing', though suggest that access to education and skills training should be included in addition to access to employment.

We make the following suggestions for the other criteria: -

'Environmental and Community Impacts' should be a separate objective and in addition to the three impacts listed should include: *Protecting and supporting the health and well-being (physical and economic) of local communities, reduce the severance of local communities and improve the efficiency of the MRN, contributing to a reduction in Greenhouse Gas Emissions.* A criteria on reducing Carbon emissions would support the governments Clean Growth Strategy, published in Autumn 2017.

The 'Reduce Congestion' objective, should include a criterion on improving the efficiency of movement of passengers and freight. For example, this could be through enabling multi-modal opportunities, enhanced traffic management and improved communications with drivers.

The 'Support Economic Growth & Rebalancing' objective should make specific mention of supporting the movement of freight.

The 'Support All Road Users' Objective should make reference to improving journey quality (e.g. Comfort and coherence on the MRN) and to supporting public transport /multi-modal journeys and intermodal freight journeys.

We would welcome the opportunity to work with the DfT on further developing these criteria.

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

Further to our response to Q14, we believe that in addition to safety and the environment, end-end journey time, reliability, journey quality and resilience for passengers and freight are fundamental to the performance of the whole MRN (SRN and the major local roads designated as part of the MRN).

These are the core outcomes that should apply across the whole of the MRN.

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

As stated a number of times in our response, TfN believes that the success of the MRN programme will not come from a series of isolated enhancements alone, but from a concerted effort over several investment cycles to improve the user experience of roads included in the network. To deliver a holistic focus on performance on the entirety of an MRN route, it is crucial that local highway authorities secure balanced funding, capital and revenue for maintenance, to be able to live up to the raised expectations that MRN status will bring.

The MRN for the North, as defined in TfN's Major Roads Report, makes no distinction between the type of road included within the MRN, for example dual or single carriageway. Although it will be important to ensure that all roads in the MRN meet a certain minimum standard of capability, particularly for HGV traffic. At this time, we see no need to separately define sections of the MRN, and believe it is important to emphasise that it should remain the role of Local Authorities to set policies and manage sections of the MRN within their area of responsibility. The interface between the MRN and local roads should also be a key consideration in planning improvements to, and the management of the MRN.

Finally, we would appreciate clarification on whether the whole of the MRN, once designated, will be classed alongside the SRN such that larger developments on the MRN automatically come within scope of the planning requirements for nationally significant infrastructure projects?