

**Chartered Institution of Highways & Transportation response to the Department for Transport consultation: 'Proposals for a Major Roads Network (MRN);**

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*CIHT is a charity, learned society and membership body with over 14,000 members spread across 12 UK regions and four international groups. We represent and qualify professionals who plan, design, build, manage and operate transport and infrastructure networks. Part of our vision is to demonstrate transport infrastructure's contribution to a prosperous economy and a healthy and inclusive society. Our values are to be Professional, Inclusive, Collaborative and Progressive.*

**Q1: Do you agree with the proposed core principles for the MRN outlined in this document? (Page 20)**

1. CIHT welcomes the ideas discussed in the Major Roads Network and the ambition to further improve the management of the UK roads network. The proposed core principles are vital to the success of that idea however the following areas require more details.
2. *Increase Certainty of Funding:* It must be clear that this funding is additional to existing programmes and that it is not diverted from other LA funding sources. This is in context of the ongoing 'Fair Funding Review' being conducted by MCHLG, which aims to establish a new baseline of funding allocations for local authorities through assessing objective need and resources. There is a risk that funds allocated to MRN maintenance, enhancements and renewals are used to justify lowered funding for LA's overall which would likely lead to lowered investment in the local roads network.
3. *A coordinated investment programme:* CIHT welcomes better coordination of investments in UK roads to manage the limited supply chains and resources available to the industry. By providing certainty of investment it will enable contractors to invest in skills and equipment and enhance the sectors overall productivity.

CIHT discourages the use of 'bidding processes' being used to determine where resources should be spent, this is unlikely to bring about the best results for routes, people and place as well as for the sector which will need to invest limited resource funding for uncertain rewards.

4. *A consistent network;* CIHT suggests that a consistent network also requires a sustained asset management and maintenance plan, otherwise there is the risk of a gradual diversion of standards and expectations of the network. There is a great deal of variation in the quality of locally managed roads which should be avoided as much as possible within the MRN and SRN.

The relevant parties must ensure that users receive a consistent high-quality level of service to achieve the objectives laid out in both this document and the Transport Investment Strategy.

5. *Clear Local, Regional and National Roles:* This must not just apply to the delivery of the MRN as a 'bridges and bypasses' programme but to financial sustainability, road safety and long-term management of the network. It must be clearly identified where responsibilities lie for specific sections, and where users must report issues or failures in the network.
6. *Strengthening Links with the Strategic Road Network:* CIHT highlights that most journeys begin and end on the local road network, and that this must not be ignored in favour of the MRN and SRN. There is an opportunity to examine the classification of the whole network and create better, more consistent standards.

7. *A Focus on Enhancements & Major Renewals*: CIHT questions whether this is obviously the best method of achieving the objectives and priorities of the MRN. Reducing congestion, improving journey reliability and supporting economic growth may all be better supported by a well applied asset management and road safety strategy rather than by focusing on new schemes.

This is also true from a fiscal perspective as the DfT states that RIS1 “showed that there can be significant value for money from maintenance and renewal schemes, with an average return of £13 for every £1 spent (Transport Investment Strategy, Page 28) which compares with a £4.5 to every £1 average return from RIS1 schemes (Transport Investment Strategy, Page 29).

**Q2: To what extent do you agree or disagree with the quantitative criteria outlined and their application?**

8. CIHT supports using the latest available data prior to the formal establishment of the MRN and that traffic flow and percentage of freight are useful starting criteria for identifying roads on the MRN. CIHT also support not using projected traffic levels to shape the initial network as that would take in predictions of road usage and hinder decisions being taken to ‘decide and provide’ the future functions we want our roads to provide. CIHT has produced further research on how to institutionalise better decisions when planning highways in our *CIHT Futures report* ([link to work](#)).
9. CIHT would suggest that data on cycling and pedestrian usage of roads be used to determine the MRN. “*Supporting All Users*” is a key part of the Transport Investment Strategy which the MRN will sit within. As the MRN will interact with high streets and communities to a greater extent than the SRN more attention must be paid to their needs, and to creating better places. This is especially the case if minimum standards are to be expected across the whole network which could increase the average speed or capacity of vehicles.

**Q3: To what extent do you agree or disagree with the qualitative criteria outlined and their proposed application?**

10. CIHT welcomes the use of qualitative criteria to define the MRN as it provides the ability to bring additional links into the network which, although they might fall outside of the quantitative criteria, nevertheless provide valuable resilience capacity or provide significant benefit to regional economies. This includes ‘*Ensuring a coherent Network*’ and ‘*Access to/resilience for the SRN*’.
11. CIHT welcomes ‘*Linking Economic Centres*’ through the MRN and would encourage taking the road capacity of towns and urban centres into account when increasing capacity on these roads to not overburden local roads with new demand. It may be necessary to use these qualitative criteria to exclude certain sections of road that match quantitatively from the network to divert traffic into more suitable corridors.
12. CIHT encourages the proposals to seriously examine the links between transport and planning as a key qualitative factor in establishing the MRN. This will tie together major strands of the government’s programme such as building housing, delivering the industrial strategy and rebalancing the economy. This could mean looking at future major housing developments and the demands they are expected to place on the road network and how they will be tied to future jobs and services. This will require a greater emphasis on integrating planning and transport right from the initial stages of project planning, an area CIHT continues to work on.

**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?**

13. CIHT believes that specifying which roads are included is best done at a local level.

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

14. CIHT believes that specifying which roads are included is best done at a local level.

**Q6: Do you agree with the proposal for how the MRN should be reviewed in future years? (P26)**

15. CIHT welcomes linking five-year updates of the MRN with the RIS process to provide long term stability to the industry and its suppliers. Having regularly scheduled assessments will reduce the administrative burden on local authorities, provide an opportunity for evaluation and identify new parts of the network which needs attention.

16. CIHT would question the requirement to refresh regional evidence basis every two years (page 8), as STBs will have varying resources and ability to undertake that work. Further there are still unanswered questions over how powers and responsibility will be shared in areas without STBs which must be considered in a planned review.

17. CIHT encourages any review to address the overall impact of the MRN, including on communities, local government finance and on the overarching aims. This could take place via a meta-analysis of the Post Opening Project Evaluations that will be performed on new schemes to avoid larger pieces of work.

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

18. CIHT supports the MRN's focus on management of the network rather than which tier of government has statutory responsibility, as users are unlikely to be concerned with who the final owner is, but rather the overall level of service provided.

19. CIHT welcomes the focus on sub-national transport bodies, regional distribution of funding and the impact on regional economies. The *Strategic Case Supplementary Guidance: Rebalancing Toolkit* (DfT 2017) is a valuable addition to Transport Appraisal Guidance and one that encourages the authors of strategic cases to better consider the needs of regional economies. This should help avoid reinforcing existing inequities in regional funding and support aims of rebalancing the national economy.

20. CIHT has concerns that the relationships between the DfT, STBs, and LAs have not been clearly laid out. The document is clear that the Secretary of State will have the final say over what makes up the major road network, but also that local highways authorities will retain management of those roads. Local Enterprise Partnerships also provide funding for highways activities via Local Growth Funds and will want to influence decision making.

21. As David Quarmbly and Phil Carey highlight, it will be necessary to “*devise an integrated planning and funding regime for both the SRN and the local authority parts of the MRN, to maximise the potential of this MRN and to get best value for money from it*” or there is risk of competing political goals due to those divisions which could result in greater local levels of local opposition to new schemes and therefore higher costs.

22. CIHT has concerns that of all the identified STBs, only Transport for the North has official statutory footing. The lack of statutory backing for bodies which are informing or leading decisions must be considered in terms of planning appeals, local opposition to schemes and democratic accountability.

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

23. CIHT notes that the proposals rely highly on the Regional Evidence Bases that STBS will develop as part of existing statutory responsibilities. For areas of the country without combined authorities it is unclear how these will be created, funded and maintained. While County, District, Unitary and Metropolitan authorities deliver benefits to their local areas many do not have sufficient resources to develop a strong evidence base for transport need.
24. If funding is provided on a bidding basis then this could disadvantage the approximately 40 per cent of England's population that lives in these areas. This could ultimately reinforce regional disadvantages rather than encourage economic rebalancing.
25. There is a need to define how STBs are funded to develop and manage Regional Evidence Bases to ensure that they are comparable for the purposes of the MRN and future Road Investment Strategies.
26. CIHT highlights that many of the financial benefits of the RJ report were due to the benefits of having a unified network, especially asset management and road safety. It will also be necessary to identify who is responsible for; ensuring a seamless connection between the SRN, MRN and local roads; providing live data for routeing, hazards and delays; and journey time and reliability.

***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?***

27. The structures proposed for areas of the country without STBS are insufficiently identified and at best will lead to unclear lines of accountability and decision making. It should be made clear that this shaping the regional evidence basis is not just for Highways Authorities but also Planning Authorities and Housing bodies.
28. DfT should have a realistic assessment of the skills and capabilities that exist within LA's to ensure that they are able to provide a useful evidence base. CIHT would encourage coordinating a plan with the Local Government Association and its special interest groups including the District Councils' Network and County Councils Network as well as ADEPT and TAG.

***Q10: Are there any other factors, or evidence, that should be included within the scope of the Regional Evidence Bases?***

29. CIHT believes that there is room for innovation and forward thinking in the funding of the road network. Regional Evidence Bases may include evidence of land value uplift as a result of specific schemes, and develop proposals to take advantage of that through taxation to maintain the roads which create that value.
30. There should be coordination with local plans to ensure that planning and housing are working together to provide the five-year land supply required, and that the housing is sustainable in terms of transport to employment and jobs.
31. CIHT argues that capacity for modal shift between walking, cycling, public transport and vehicles should be assessed at the strategic level. The strategic questions of congestion and capacity that the STB's seek to answer can only be addressed by making best use of our existing network, and spatially efficient modes of transport must be better understood.

32. CIHT suggests that the assessment of the networks overall condition and performance should be considered in terms of total expenditure (TOTEX) rather than separating capital expenditure and operations expenditure. It is the overall finance envelope which should determine decision making rather than at what stage money is spent.
33. The future potential for regions to cope with Connected and Autonomous Vehicles may also be worth assessing using the work DfT and HE are performing in other projects. This will ensure that the Regional Evidence Bases are preparing for future developments in technology which will affect long term strategic planning.

**Q11: Do you agree with the role that has been outlined for Highways England?**

34. CIHT supports the role for HE laid out in the proposals, including
  - Programme Support
  - Analytical Support
  - Cost Estimate Support
  - Delivery Support
35. CIHT would also encourage HE to offer strategic transport planning support and strategic asset management support as part of their remit to shape the strategic network of England's Roads. This could take place within the wider context of skills and capability issues within the industry. In order to fulfil this role HE will require proper resourcing to ensure that its other strategic functions such as determining the upcoming Road Investment Strategy are not affected.
36. There is a need to establish whether HE is leading or responding to local concerns when it comes to developing new schemes. There is clearly an existing understanding of where improvements are needed on local roads and the impact on the SRN, this information should be used to create the best possible outcome regardless of road ownership.
37. Given the planned changes to the *Design Manual for Roads and Bridges* which will remove much of the information local authorities rely upon, there is a role for HE to support consistent engineering and design standards across the MRN.

**Q12: Do you agree with the cost thresholds outlined?**

38. CIHT believes that eligibility should be assessed under Total Expenditure (TOTEX) rather than Capital Expenditure (CAPEX) alone as long term strategic improvement will rely on overall network management. It will also be difficult to win local authority approval for schemes that they will be responsible for maintaining, without demonstrating medium to long term cost savings.
39. CIHT questions the lower threshold of £20 million as it will exclude many cycling and walking schemes that can have significant impact on managing network capacity, be it by improving alternative routes or providing new segregated capacity. Given that more than half of car driver trips [are under 5 miles](#) this could be effective at reducing congestion on the MRN.
40. The relevant factor to the benefit of schemes is the outcome for the overall network so the restrictions may not be necessary, and if schemes which are below the £20 million cost but which are technically complex or have a significant impact on the SRN require funding this should be considered for MRN funding.

**Q13: Do you agree with the eligibility criteria outlined? (Page 32)**

41. CIHT raises concerns over the focus on major enhancements and renewals without sufficient focus on the overall objectives in the Transport Investment Strategy and RJ report. The original proposal was focused on the overall benefits of managing a network as an integrated whole which may not be achieved by funding individual schemes.
42. CIHT questions why the proposals identify that “*measures to revive the old routes through town and village centres to benefit communities, for example through traffic calming and facilities for pedestrians and cyclists*” but that this will be possible but only in the context of bypasses or other new alignments. Given the focus is on the overall objectives which included encouraging growth, housing development and decreasing congestion which can be encouraged through schemes which encourage cycling and walking this could be considered a missed opportunity.

Similarly, to HE’s remit to spend money outside the SRN when it can provide a positive benefit to the SRN itself there is an argument to be made for MRN funds to provide the same function.

43. CIHT queries the absence of eligibility for asset management and maintenance programming, particularly when some of the eligible schemes such as Variable Message Signs will result in a long-term funding commitment from the relevant local authority.
44. It is important that the money available from the MRN, and the types of schemes that it is willing to fund, must not bias investment decisions towards pure road schemes and that investment which meets the MRN objectives by sustainable transport such as improving facilities for public transport, pedestrian access including road crossings and cycling.

**Q14: Do you agree with the investment assessment criteria outlined?**

45. The core investment assessment criteria are broadly but with some areas of concern, including;
46. *Reducing Congestion*: In the initial objectives this is placed squarely in the context of economic growth, with ‘adding capacity to reduce congestion and crowding’ being seen as an important instigator of growing the economy. CIHT would question whether the figures used in HE’s economic assessments are derived from realistic assumptions as to the costs of congestion, and the benefits that will be gained by the type of schemes proposed.
47. The consultation document states that there has been a 9.7% increase in average delays on the local road network since December 2014. In ‘real terms’ this is equivalent to an increase of 4.1 seconds per mile, on average, compared to free flow. For an average 11-mile commuter trip by car in the South-East this is an approximately 46 second increase in duration, which is not likely noticeable to the average road user.
48. Equally the estimates in RIS1 which show congestion on the SRN costing the road freight industry £37 billion in 2040 is not automatically an argument for building new road infrastructure, without exploring alternative methods. Embracing new methods of freight delivery in the UK via recently upgraded port infrastructure (such as Liverpool 1 or London Gateway) has the potential to reduce the amount of time freight vehicles need to spend on our road network at all.
49. Exploring new methods of road management, such as congestion charging, road pricing or average speed cameras can also increase the overall reliability and capacity of the network as and should be considered eligible for funding.
50. “*Managing congestion needs to be environmentally sustainable*” is also stated as an aim within this objective which may not be compatible with enhancements that lead to greater distances travelled or “*making possible new trips*”.

51. Prioritising these conflicting goals is a key reason the UK needs to an integrated and long term national transport plan. This cannot be based on a simply predicting future growth and building for it regardless of costs, but needs to make decisions as to how we want our transport system to function and develop real options.
52. CIHT welcomes the reference to 'unpredictable delays', as our members find that consistency of travel time can be more valuable to users than speed improvements alone. With that being the case, CIHT suggests that active maintenance and improved asset management can result in smoother and more reliable journeys for the user than enhancements alone, and that there is a case to be made for the extra funding to be used in a more flexible way.
53. CIHT also encourages DfT to consider how the MRN works in sync with the SRN, as in certain circumstances such as during enhancements, renewals and asset maintenance traffic can be routed from one to the other. How this interface is managed is key to the success of the road network delivering consistent and reliable journeys.
54. Road congestion is a multi-faceted issue but one that cannot be solved without addressing the fundamental questions of induced demand, and how we plan and integrate our transport network.
55. *Support Housing Development.* CIHT welcomes the MRN commitment to increasing house building in areas of need, and the recognition in the Government's housing white paper that transport infrastructure is key to addressing those concerns.
56. CIHT is concerned that the drive to produce houses is neglecting the criteria laid out in the NPPF which states that new developments should "*actively manage patterns of growth to make the fullest use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.*" (Article 19, NPPF) with the focus being on pure numbers of houses built. If private car usage is the dominant method of transport used by new residents in an area this will have consequences for congestion, the environment and local integration. This is particularly relevant given the focus of the new NPPF and Cycling and Walking strategy consultations.
57. CIHT would encourage the MRN to focus on supporting sustainable housing development, which enables public transport usage, cycling and walking and be cautious about progressing road infrastructure that supports the opposite. The spending of money from a separate pot such as the MRN to "unlock land for housing developments" can change the financial calculations for development in an area and it must acknowledge that roads are a necessary and integral part of new development but are not sufficient to enable long term liveable areas.
58. CIHT welcomes the offer to "help to improve how transport is planned for new developments from the outset" and would like clarity of how that takes place if schemes are managed by Local Highways Authorities and if Highways England will be willing to share transport planning expertise.
59. The proposals also state that road schemes can provide "new routes on city and commuter networks" which is directly opposed to the stated goals of the elected Mayors of Greater London, Greater Manchester and Liverpool City region. These are three of the biggest centres of employment in the country and who all aim to reduce the number of car journeys within their areas. This is another example of the political difficulties that will be encountered by the split nature of the SRN/MRN network.
60. CIHT states that these potential conflicts between sustainable housing development and road schemes must be examined in the context of the UK's environmental and social goals. The money from the MRN pot must not be used to bias housing development in favour of road centred schemes.

61. CIHT highlights that while the proposals mention that road schemes can “contribute to creating places that promote wellbeing”, health outcomes are not an integral goal of the MRN. CIHT would encourage the DfT and Highways England to include health outcomes as integral parts of their development process.

***Q15: 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.***

62. CIHT considers that the UK has identified ill health as placing major demands on public expenditure, through obesity, mental health issues and adult social care, with the latter taking up almost 40% of some local authority budgets. As a key determinant of public health it should be a major part of assessment for transport investment.

63. There has been a great deal of work performed by bodies such as Public Health England, NHS England and the National Institute of Clinical Excellence on the importance of active travel in keeping our population healthy. Proposals for MRN funding should include health impact assessments to ensure that they are not discouraging active travel and are achieving the potential to save money for the public sector overall rather than focusing on a narrowly defined purpose of transport.

***Q16: Is there anything further you would like added to the MRN proposals?***

64. CIHT would encourage DfT, HE and local authorities to recognise that a large percentage of the roads that will make up part of the MRN will have a significant place making role as well as being used for transport. In the RJ report they estimate such roads could make up as much as 23 per cent of the network (13 percent classified as ‘multiple-access – urban and 10 per cent classified as ‘limited-access – urban’.)

65. There is an opportunity for government to examine what we want the role of local and urban roads to be, and to examine the role highways play in encouraging health, community and economic growth as well as in terms of movement,

This will mean that that the MRN will have to adapt to challenging urban environments, and CIHT suggests that design principles such as those identified in our recent shared spaces report are considered, such as;

- Inclusive environment
- Ease of movement
- Safety and public health
- Quality of place
- Economic benefits