**Department of Transport Consultation**

**Proposals for the Creation of a Major Road Network**

**Response from Cheshire and Warrington Local Transport Body**

**General Comments**

The Cheshire and Warrington LTB welcomes the opportunity to comment on the Department for Transport’s (DfT) proposals for the Creation of a Major Road Network.

We welcome the consultation document recognising the importance of major local roads in facilitating the efficient and reliable movement of people and goods and supporting transport connections to important centres of economic activity. This is a critical component for supporting our Strategic Economic Plan and achieving our aim of doubling the economy of Cheshire and Warrington by 2040.

Given that road users generally do not recognise boundaries between highway authorities we consider that it is important that the Major Road Network (MRN) is viewed as a seamless network of roads, encompassing both the SRN and economically important locally managed roads. This will require a more joined up and collaborative approach to be taken by DfT, Highways England, Sub-national bodies, LEPs, local authorities (and where appropriate, neighbouring cross boundary organisations, for example Welsh Government and Midlands Connect in our case) to support a more integrated network for long-term planning, co-ordinated network improvements, consistent operation and maintenance standards.

In preparing this response we have also taken note of the Transport for the North (TfN) Major Roads Report.

**Response to consultation questions**

**Core Principles**

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

The LTB broadly supports the proposed core principles. We welcome the recognition of the need for increased certainty of funding as this will help to deliver major benefits in terms of the ability to develop a pipeline of transport improvements. However, as proposed, the certainty of funding would only be at the national level, with local schemes having to go through two levels of prioritisation process (regional and then national) with no guarantee of securing any funding. Scheme development can be an expensive process hence it will be important to identify the priorities early in the life cycle of projects to avoid expensive and abortive work. It would be helpful if indicative budgets could be indicated for sub-regions to assist with this.

Developing and agreeing MRN priorities will need to be an inclusive process; comprising constituent LEPs and local authorities and considering cross boundary priorities, which for Cheshire and Warrington sub-region includes Welsh Government and Midlands Connect.

Whilst there is an understandable focus on enhancements and major renewals it is important that the network is maintained to a consistently high standard, hence we recommend that the Government considers providing certainty of funding for maintenance for the network.

**Defining the MRN**

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

The Cheshire and Warrington local authorities contributed to work led by TfN to define a Major Road Network for the North which was agreed by the TfN Partnership Board in 2017. The LTB endorses the view that this network is considered to be that which is most economically functional to securing the North’s long term productivity and growth.

In defining the MRN for the North, TfN worked closely with local transport authorities and LEPs to identify and agree the extent of the network. The TfN defined network connects some 198 Important Economic Centres (IECs), including towns, cities, ports, airports, enterprise zones, universities and other key employment sites. General principles for identifying the IEC’s were –

* Current economic centres - generally have a population of greater than 50,000 people (or perform a strong sub-regional function); and
* 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.

The work 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 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 fails to fully 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 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. A further important point is how far the MRN extends into towns and cities. Local Transport Authorities would be best placed to advise upon this.

The LTB is supportive of the use of a quantitative metric based on identifying Important Economic Centres as already undertaken by TfN, but considers that an approach to defining the MRN which is primarily based on AADF is too restrictive.

***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 also agree that the MRN needs to be a coherent network that links the IEC’s across the country and ensures consistency across regional and national 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.

As noted by the TfN response, *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 Important Economic Centres, would avoid the requirement for a ‘work – around’ solution where sections of road fall below the AADF threshold.

As we have already stated, we believe that MRN should link *Economic Centres,* and note that TfN have defined the MRN for the North on that basis, using an agreed set of criteria.

*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.

***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. As stated above we consider that the network we identified jointly with TfN better represents the most important local roads. The current criteria mean that the following A roads are excluded when compared to TfN’s definition:

* A54 (A556 to Winsford, and Congleton to M6),
* A533 (M56 to Northwich),
* A534 (Congleton to Nantwich and Nantwich to Welsh Border),
* A34 (Congleton to Wilmslow),
* A537 (East of Macclesfield)
* A51 (South of Nantwich)
* A530 (Crewe to Middlewich)
* A483 (A55 to Chester)
* A41, A5116, A56, A51, A5115 (from A55/M56 ring road radially to Chester inner ring road)

In each case the routes represent the main A roads which either link the towns within the sub-region directly to each other or directly to the SRN.

***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 stated in the answer to question 2 the LTB considers that the MRN defined jointly with TfN best reflects the network considered to be that which is most economically functional.

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

The LTB would support periodic reviews of the MRN but also recommend that this should be done alongside the SRN to reflect any changing circumstances.

**Investment Planning**

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

The LTB is concerned about the proposed double prioritisation process and its increasing remoteness from the development of local industrial strategies. LEPs/LTBs should have a much stronger role in identifying and agreeing transport priorities that are integrated with and directly support the delivery of the local industrial strategies.

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

We await the guidance for developing Regional Evidence Bases. It will be important to avoid creating an expensive and time-consuming process. 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, and in particular how this will relate to and take account of Local Industrial Strategies.

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. Given that staffing resources are limited It is important to avoid creating an “industry” out of this process but rather ensure a proportionate process for identifying priorities.

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 have an input into 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.

***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?***

Not applicable for Cheshire and Warrington given the existence of TfN.

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

We support TfN in their view that the Regional Evidence Base should encompass the role of the SRN, as part of the MRN.

The LTB supports the view being taken by TfN to seek assurance that, in assessing evidence, the DfT will take a long-term programme level approach, 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.

The LTB also supports 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?***

The LTB considers that Highways England has a role to play in ensuring that the strategies and programmes for the SRN are aligned with those of the MRN. Highways England could also have a role supporting those authorities with limited capacity to develop MRN schemes at the behest of those authorities.

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

We consider that the proposed lower and upper cost thresholds proposed in the consultation are too restrictive. A minimum threshold of £20M seems high and potentially rules out low cost/high benefit schemes e.g. pinchpoint type schemes which could have a significant benefit foe an area. 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 seems too low. For example, a number of the current Large Local Major Schemes in the North have a cost in excess of £200M.

**Eligibility and Investment Assessment**

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

We support the types of schemes listed in the consultation as eligible for funding. We support TfN’s advocacy of 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.

Whilst we acknowledge that in defining a network routes of lower significance will be excluded it is important that the MRN is flexible to change, particularly in response to new developments and new highways. Non MRN roads will still be important for local journeys and hence funding for improvements to these roads will still be needed. Therefore the LTB would like to know what mechanism will be available for future major improvements to non MRN roads.

***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. It should also reference supporting the movement of freight.

We support TfN’s suggestions for the other criteria: -

Environmental and community impacts - this should be a separate objective and in addition to the three impacts listed should include: *reduce the severance of local communities* and *improve the efficiency of the MRN, contributing to a reduction in Greenhouse Gas Emissions*.

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

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

***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 support TfN’s position 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 MRN).

**Other considerations**

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

The LTB considers 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 have access to sufficient levels of stable funding, capital and revenue, to be able to deliver the expectations that MRN status will bring.

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?



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**Chair, Cheshire & Warrington Local Transport Body**