

APPENDIX 2

Officer response submitted on behalf of the council to DfT's consultation on proposals for a Major Road Network [MRN]

DfT Consultation Question	Comments
Core Principles	
<p>1. Do you agree with the proposed core principles for the MRN outlined in this document?</p>	<p>Officers have considered and agree with five of the six proposed core principles, although the exclusive focus on enhancement and major renewals raises concerns about the possible implications for funding necessary revenue investment in repairs.</p> <p><u>Core principles</u> The intention for 'Increased Certainty of Funding' is welcomed. This approach will require safeguards within the bidding process to provide confidence in the availability of funding beyond a single five-year period. This will maximise the effectiveness of investment planning. Having 'A Consistent Network' is also key, but only applies to definition rather than standard or user experience. It is agreed that 'Strengthening Links with the SRN' is important and that the MRN and SRN investment programmes must be complementary and fully aligned. This will assist greater strategic and regional co-ordination between authorities and agencies when seeking to achieve a single coherent system of main roads for the benefit of users and the regional economy.</p> <p>As highlighted above, improved standards and performance across the MRN will also depend on having sufficient revenue funding for traffic management, information provision and day-to-day maintenance, as well as additional capital funding for improvements or major renewals. It is therefore considered essential that existing funding arrangements are provided to local highway authorities in proportion to the extent of MRN road for which they are responsible, to enable them to meet the higher expectations and maintenance cost that MRN status will generate.</p> <p><u>Objectives</u> The inclusion of 'Support the SRN' is acknowledged, however the priority accorded to MRN improvements on local authority roads should not be significantly influenced by this factor. 'Improving connectivity with the SRN' may be a better term to use as it is recognised that safer and improved flows between the SRN and</p>

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	<p>MRN are required in some areas, but this should be a priority for Highways England as the responsible agency for the SRN.</p> <p>It is considered that insufficient importance is allocated to environmental and safety considerations within the MRN consultation. Safety is imperative in achieving 'better journeys' and will 'Support all Users'. Environmental issues should also be considered within the 'Reduce Congestion' theme. By broadening the objectives for the MRN, it will be possible to create a much more comprehensive and meaningful set of criteria for investment assessment</p>
Defining the MRN	
<p>2. To what extent do you agree or disagree with the quantitative criteria outlined and their proposed application?</p>	<p>The proposal to use a two-tier traffic flow criterion as the starting point for identifying the most economically important local authority roads is agreed and that AADF (Annual Average Daily Flow) is a suitable unit to help initially identify need/importance.</p> <p>Some further refinements to the flow criteria will also assist in creating a more robust measure. Applying single thresholds of a road with traffic flow only just below 20,000 AADF, and with HGV and LGV proportions only just below the 5% or 15% thresholds is limiting. A ranking/scoring system that enabled a range to be applied e.g 10,000 to 20,000 AADF would provide greater latitude.</p> <p>Use of a single year's flow is also not a robust measure of trends or activity and could be unrepresentative due to temporary peaks or troughs in traffic flow, or equipment faults. Use of a five-year average of traffic count data would be far more reliable. Any inconsistencies would be smoothed out by using the average figure.</p> <p>Officers agree that forecast future traffic growth should not be used to factor up the AADF data and only current data should be used to determine inclusion in the MRN. The starting point for determining the MRN's definition is limited to the set of 'A' roads across England. Some 'B' and 'C' class roads in Brighton & Hove perform an important function in connecting economic activity and also connect with the SRN. It is therefore possible that the MRN project will provide a useful basis on which to review the city's road network, classifications and hierarchy, in line with its LTP.</p>

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<p>3. To what extent do you agree or disagree with the qualitative criteria outlined and their application?</p>	<p>‘Ensuring a Coherent Network’ is arguably more of a methodological requirement than a significant qualitative requirement to determine the roads to be included in the MRN. The methodology proposed is acceptable. The other two qualitative criteria address the key substantive elements that need to be added, but they are considered to be broad terms that cover several distinct considerations.</p> <p>Other available, national datasets could also be applied, in addition to the set of population centres and gateways or transport hubs identified in the proposal, and these are:-</p> <ul style="list-style-type: none"> • employment density (NOMIS data); • Enterprise Zones and ‘Economic Opportunity Areas’ (as used by Highways England); • proximity of adjacent economic centres (population hubs); • Agreed Diversion Routes from the SRN; and • SRN performance - average speed by link.
<p>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?</p>	<p>Working closely with colleagues within the TfSE region, it is considered that the proposed MRN within the consultation does not include all roads that it should in terms of fulfilling and addressing more local and cross-boundary needs. Officers have therefore proposed the following alterations and are recommending that the council supports them :-</p> <ul style="list-style-type: none"> • Include the A259 from ESCC boundary to WSCC boundary • Include the A23 – southern section (from London Road/A270 to A259) • Include the A293 (between the A27 (Hangleton) and A259 (Portslade)) • Delete the A270 (Upper Lewes Road). <p>In summary, these are proposed as they are in line with applying a fuller approach to qualitative criteria and reasons of connectivity, and already meet the quantitative traffic criteria.</p>
<p>5. Have the quantitative or qualitative criteria proposed in the consultation identified sections of road you feel should not be included in the MRN?</p>	<p>Yes – as outlined above in Q4. The A270 Upper Lewes Road proposal should be deleted.</p>
<p>6. Do you agree with the</p>	<p>Officers agree that a balance needs to be struck</p>

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MRN should be reviewed?	between the consistency and stability of the MRN - for planning, operation, and public perception - and maintaining relevance to the country's needs. The five-year cycle, reviewing the MRN, in a joint exercise with the SRN, is considered appropriate.
Investment Planning	
7. To what extent do you agree or disagree with the roles outlined for local, regional and national bodies	The roles outlined are considered to be reasonable at this stage in the development and definition of the MRN.
8. What additional responsibilities, if any should be included? Please state at which level these roles should be allocated?	<p>The proposed balance of responsibilities across different levels is accepted and the focus on a programme of investment proposals from TfSE as an STB is welcomed in terms of overseeing the MRN on a regional basis. TfSE is best-placed to take on the important strategic role for the MRN and should have full responsibility for the development of its Regional Evidence Base [REB], working closely with local highway authorities and its constituent LEPs and taking account of their Strategic Economic Plans. The cost implications for Highway Authorities for preparatory work for the REB also need to be recognised. It is recommended that the approach to the MRN should be aligned with that for the SRN, whereby funding is allocated within the RIS for scheme development work and strategic studies.</p> <p>Officers welcome the proposed flexibility for regions to design and manage the process of submitting schemes for consideration by the DfT which are supported by the local authority and relevant LEP. There also needs to be sufficient, ongoing flexibility within the region's programme of schemes so that spend can be managed effectively and efficiently.</p> <p>Highway Authorities will have a central role in identifying the need for enhancements to the MRN, ensuring local dialogue feeds in expertise about the most effective solutions, for example in the last mile approach to international gateways. On occasions it is acknowledged that it may be appropriate for TfSE to participate in identifying and prioritising investment proposals, such as those which cross council boundaries and require joint working. The A259 is a recognised example of this within Brighton & Hove, given its connections with WSCC and ESCC.</p> <p>It is accepted that a single local Highway Authority</p>

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	<p>should take overall responsibility for delivery of each scheme, although in many cases this would be likely to be a lead authority, working closely with neighbouring authorities, as outlined above for Brighton & Hove. It is accepted that the LEP should be an active partner in development plans for the MRN locally, particularly where the primary rationale is completing economic connections. It is important that proposed investments on the MRN align with the delivery of LEP Growth Deals and the emerging Shared Prosperity Fund and that the LEPs have an input into TfSE's overall prioritisation of projects.</p>
<p>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?</p>	<p>The primary issue that must be addressed in this context is that it is essential strategically that the management of the development of the MRN in non-STB areas take full account of the impacts on neighbouring STBs. In particular, this is important for the TfSE area given that the proximity of and connectivity with London is key to the south-east's economic connectivity and activity. Transport for London will therefore be expected to play an active role in the MRN programme.</p>
<p>10. Are there any other factors, or evidence, that should be included within the scope of the Regional Evidence Base?</p>	<p>It is considered that the Regional Evidence Base must include the role of Highways England's SRN within the region. Any investment proposals for the MRN must be founded on an assessment of the role and relationship between the two networks in combination. It is also critical that the Regional Evidence Base takes account of major investment plans for the rail network which could affect demand for road-based transport, such as the Brighton Main Line.</p> <p>Whilst the proposed fast-tracking of a number of schemes for early entry this year into the MRN Investment Programme means such proposals will not be underpinned by the full Regional Evidence Base, officers recognise the value in making early progress with the MRN concept. Consideration will be given to possible proposals within the city which the council may wish to be fast-tracked.</p>
<p>11. Do you agree with the role that has been outlined for Highways England?</p>	<p>Highways England must play an active role in the MRN Programme. Priorities for the MRN in the TfSE area must take full account of plans in the RIS for the Highways England network. The interrelationship between, and the extent of, the two networks will be further informed by the future results of the recent consultation on Highways England's SRN Initial Report.</p>
<p>Eligibility and Investment Assessment</p>	
<p>12. Do you agree with the</p>	<p>It is understood that across a wide region majority of</p>

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<p>costs thresholds outline?</p>	<p>cost-effective interventions could fall within the £20-50 million range, and that Packages of Improvement in particular may present a strong case for funding up to the £100 million limit. However, it is recommended that some flexibility is introduced at the lower £20m threshold, particularly where significant schemes could achieve substantial benefits and high value for money on the MRN but would require lower levels of funding, especially in smaller, built-up authority areas such as Brighton & Hove. The improvements that will be achieved in the Valley Gardens area of the city are a good example of this.</p>
<p>13. Do you agree with the eligibility criteria outlined?</p>	<p>In considering these criteria, officers support the inclusion of Packages of Improvements that improve conditions or experiences of all road users in an integrated way, and agree that these could play a crucial part in raising the standard of the MRN and in meeting wider, strategic objectives for the road network within the TfSE region. In some areas and on certain routes, a focus on a package of minor enhancements along an MRN corridor will be the most effective way of addressing deficiencies in the performance and safety of a road, and its environmental impact. The A259 is a good example of this within the city and the Greater Brighton City Region area, where the built environment is constrained and environmental designations are significant. For example, this could include the provision of more sustainable/active travel options which improve priority, safety and convenience while maintaining traffic flow.</p> <p>The proposed approach to key MRN corridors in the phased upgrading of All-Purpose Trunk Roads to expressways set out in Highways England's SRN Initial Report is welcomed as it could provide consistent treatment for longer stretches of road to improve their overall performance for all road users. The roll-out of the expressway concept to the busiest sections of the MRN, as well as the SRN, should be considered in the longer term.</p> <p>It is acknowledged that some 'Widening and Junction Improvements' will be sufficiently large-scale to qualify as MRN schemes in their own right, or indeed could be proposed in combination for a short stretch of road, where investment needs to be more concentrated than for the longer corridor that would be the subject of a Package of Improvements.</p>

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	<p>'Major Structural Renewals' should also play a significant role in raising the condition and standard of the MRN for all road users, and in some areas may be essential in ensuring the network is fully accessible to the levels of freight traffic that need to use it.</p> <p>We welcome the inclusion of schemes focused on 'VMS, Traffic Management and the Use of Smart Technology and Data', and expect these to be fully co-ordinated across wide areas and routes rather than single stretches of road. It is essential that any such local system is fully integrated with (and use the same technologies as) existing and proposed new Highways England systems on the SRN. This is particularly important for the city given the A23 and A27 Trunk Roads roles in serving the city's residents and visitors. In terms of the proposed exclusions from programme eligibility, it is considered essential that all work on the SRN itself should be funded by Highways England through the RIS, despite the reference to some schemes on the SRN being of a 'distinct local sub-national nature' which could qualify for MRN funding.</p> <p>In terms of public transport improvements, it is essential that this process should enable a substantial element of provision and prioritisation for passengers travelling by bus and coach in plans for enhancing the MRN. As outlined above, public transport plays a significant role in reducing congestion, the first of the objectives for the MRN, as well as helping meet other objectives. All MRN roads should provide for, or support, better access to bus and coach services as a means of ensuring the whole network can be used as efficiently as possible.</p> <p>Public transport, and other alternatives to the private car, are expected to form a central component of a distinct approach to the needs of MRN corridors that are within or pass through, urban areas. Within the proposed MRN for Brighton & Hove, some roads will serve the needs of 'place' (as significant or local destinations) as much as 'movement'. The maintenance, management and improvement of such roads or corridors in the city are established within the context of its wider transport (and land use) policies, as set out in the City Plan (Part 1) and LTP.</p> <p>The revenue spending implications of all capital investments must be addressed through changes to the</p>

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	existing Highway/Transport revenue funding processes and decisions for local councils. It is accepted that the day-to-day maintenance of the MRN will remain the responsibility of local Highway Authorities via existing funding allocations. It is essential that the council's local highways maintenance funding should not be adversely affected by the creation of the MRN and its associated funding process.
14. Do you agree with the investment assessment criteria outlined?	Yes. It is also considered that a more inclusive approach to investment in the MRN will be achieved from a wider range of stakeholders if the environmental impacts currently noted under the 'Reduce Congestion' heading were highlighted separately. This would also enable issues such as severance and design to be taken into account within MRN investment proposals and decisions
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.	It is recommended that some adjustments to the criteria are required. Regarding 'Support All Road Users', the safety and security of all users is paramount and a high priority. The focus on journey quality for users is also key, irrespective of which roads are used (MRN or SRN) especially when considering end-to-end journey times, reliability and resilience.
Other Considerations	
16. Is there anything further you would like added to the MRN proposals?	It is essential that the MRN designation and its associated investment priorities improve the performance of the roads within it. This will enable the MRN to achieve its objective of supporting the economy and planned growth. The MRN will be managed and funded alongside the SRN, which is now subject to a detailed performance specification, carefully monitored by the Office of Rail and Road. At a regional and national level, it may be desirable or necessary to seek to create a similar arrangement for the MRN. The success of the MRN programme will be achieved by continuous investment in appropriate improvements that assist in improving road users' experiences of roads included in the network. To achieve this, councils require adequate and balanced levels of capital and revenue funding. The consistency of standards of infrastructure of MRN roads is also important, as it varies greatly now. It will be important to ensure that all roads in the MRN meet a certain minimum standard of capability, particularly with regard to HGV traffic and highway structures.