

## PROPOSALS FOR THE CREATION OF A MAJOR ROAD NETWORK

### The Confederation of Passenger Transport UK response to the Consultation

The Confederation of Passenger Transport UK is the trade association of the bus and coach industry, representing over 1000 operators including large bus and coach companies and numerous SME companies

#### Core Principles

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

CPT agrees in general with the six core principles for the MRN.

The increased certainty of funding using the national roads fund is to be welcomed in order to maximise the long term benefits of the network. Coordinated investment and a consistent network are essential principals, as ensure roads that cross local authority boundaries retain the same priority, and that improvements in performance are delivered along entire routes.

We agree that links between the MRN and SRN need to be strong, and as seamless as possible, but this will only be achieved if funding and planning processes are closely aligned.

It is essential that there is a clear definition of the roles and responsibilities for local, regional and national bodies. We have concern that some STB's may not yet be in a position to take a leading role, and that areas of the country without current plans to establish one may be disadvantaged.

However we would question an exclusive focus on enhancement and major renewals whilst leaving the general maintenance of the MRN to separate funding through existing arrangements. This does not give any certainty that sufficient funding will be available, especially when Local Authorities already face shortages. If, as stated MRN funding needs to bring about improvements in standards and performance across the network it is obvious that securing reliable and consistent funding for maintaining the existing and any future enhanced network as well as for the day to day operation of the network should be an important part of the core principals.

The guiding principle of the MRN, that local highways maintenance funding should not be adversely affected by the creation of the MRN does not offer enough assurance that funding to maintain the enhancements and renewals will always be available.

### Defining the Network

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

CPT strongly agree with the proposal to use traffic flow levels as measured by Average Annual Daily Flow as the identification tool to define the initial set of roads to be included in the MRN. We also strongly agree that there is an additional criterion to include roads where the AADR falls below the defined level but where HGV/LGV flow is higher than defined. We would also consider that roads where PSV traffic flow exceeds the defined level should also be included within this category.

We agree that the definition of a Level 2 network as included in the Rees Jeffrey's Road Fund report "A Major Road Network for England" should be updated to ensure it is based on the latest data.

We would question the proposal to include de-trunked roads within the MRN "where appropriate". CPT considers that the same criteria should be used for all roads that are to be included in the MRN with no consideration given to any previous designation.

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

CPT strongly agrees that in order to make the MRN a consistent and coherent network, with completed routes a qualitative approach should also be used in defining the roads to be included.

We agree that the qualitative criteria used by Rees Jeffrey's are appropriate for this, although we believe that there may be locations where proximity to economic centres is as important a criterion as direct links.

We also strongly suggest that the qualitative criteria be expanded to include those roads that provide important diversion routes at times of stress on the SRN, but do not meet the requirement to directly link economic centres.

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?*

As stated above in our answer to Q3, CPT strongly believes that roads that often serve as diversion routes at times of stress to the SRN, but do not meet either the quantitative or qualitative criteria should be included in the MRN.

An obvious example of this is the A38 south of East Brent, through Bridgwater, Taunton and continuing to the A361. This route serves as the only diversion when there are problems on the M5 which in turn is also the only route from the Midlands and Bristol towards Somerset, Devon and Cornwall.

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

As stated above in our answer to Q2 CPT do not agree that de-trunked roads that do not meet the agreed criteria, or do not serve as agreed diversionary routes should be included in the MRN

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

CPT agrees with the proposal to review the MRN every five years to coincide with the existing SRN review cycle in order to maintain a consistent and stable network.

### Investment Planning

7. *To what extent do you agree or disagree with the roles outlined in the consultation document*

CPT agrees that local, regional and national should all have a clearly defined role, and agrees with the roles outlined in the document. We continue to have concerns that the areas of the country that are without a STB, or where the STB will not receive statutory powers soon, could be at a disadvantage.

We believe that further consideration should be given to ensuring that a mechanism is in place to ensure local authorities and local highways authorities work in partnership in areas where no STB exists.

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

CPT is in agreement with the responsibilities outlined for the various roles outlined in the document and has nothing further to add at this time.

9. *Do you agree with our proposals to agree regional groupings to support the investment planning of the MRN where no STBs exist?*

CPT agrees that these areas require regional groups and partnerships to be involved in the investment planning of the MRN. We continue to be concerned that these potential groupings will not be sufficiently large or broad based to have the same significance as the STBs in influencing and supporting the overall planning of the MRN.

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

CPT considers that additional factors such as the potential impact of HE schemes included in RIS1 and RIS2, and the reverse impact on those schemes from the MRN, also the impacts of major rail schemes such as HS2 should be included in the evidence base

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

CPT strongly agrees with the role outlined for Highways England in relation to the MRN. The Road Investment Strategy and Strategic Road Network must work in close conjunction with the MRN, and HE will have a number of important roles to ensure that can happen. For Highways England to become involved beyond the four support functions outlined in the Consultation would be in our view be inappropriate.

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

CPT believes that the Department for Transport is best placed to set these thresholds, but we would hope that there will be some flexibility with the allowance for some schemes that may fall below the threshold, and in areas where a whole package of measures are appropriate some flexibility to allow larger amounts to be spent in conjunction with funding from other sources.

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

CPT welcomes the clearly stated eligibility criteria included in the consultation.

An emphasis on focusing on packages of improvements along a particular road or route could go a long way to raising the road standard to the required level without costly and disruptive structural work being undertaken.

CPT believe that filling missing links, and building bypasses are an important areas to focus on, for both improving congestion and journey times, but also reducing journey distances and from an environmental viewpoint reducing emissions by avoiding congestion and allowing vehicles to travel at consistent speeds.

CPT also believes that some roads in the proposed MRN should be eligible to be brought up to Expressway standard in line with current plans for the SRN, with a subsequent improvement in safety and overall performance.

CPT does not agree with the all of the exclusions outlined.

We can agree with exclusions 1 and 4

We would not agree with there being any case where funding allocated to the MRN is used for schemes that are wholly part of the SRN

CPT rigorously objects to the exclusion of public transport enhancements (except where part of a wider intervention). We believe strongly that incorporating improvements and enhancements for bus and coach traffic will have a significant impact on the first of the five central policy objectives, reducing congestion. Buses and Coaches take a significant number of private cars off the road, and as such it must be essential that public transport enhancements are eligible for investment and in many cases they will be central to achieving the targeted improvements where the MRN forms part of an urban corridor.

14. *Do you agree with the investment assessment criteria outlined in the consultation document?*

CPT strongly agrees with the investment assessment criteria.

We do however consider that environmental impacts should be given a higher prominence within the criteria as laid out in the document, and separated from the criteria to alleviate congestion

15. *In addition to the eligibility and assessment criteria described what, if any, additional criteria should be included in the proposal?*

CPT agrees with the criteria outlined in the proposal. We feel that the criteria to alleviate congestion should be expanded and include measures to improve public transport links, specifically enhancing journey times, and also a focus on taking traffic where possible out of urban areas in order to reduce congestion on local routes outside of the MRN

### Other Considerations

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

The consultation document makes no reference to any performance measures that will be used to measure whether or not the MRN is delivering on its objectives. Additionally in the Rees Jeffrey Report it specifically calls for separate Tiers within the MRN, and “different treatment of, and expectations from,” the various tiers.

We believe that the MRN should be subject to a performance specification that takes account of these differences in order to properly evaluate its success.

CPT also believes that having different Tiers of roads within the MRN should not mean that the all of the roads included do not meet a minimum specification, and that they should be suitable for all vehicles to utilise, including PSV and HGV traffic.

In summary, CPT supports the establishment of a Major Road Network that opens up funding for enhancements and improvements, but also provides a certainty of funding to ensure proper maintenance.

We strongly believe that bus and coach transport provide a real solution to improving congestion and reducing the environmental impact of emissions throughout the network, both on inter-urban and urban routes and would urge that they are given proper priority within all schemes on the network.

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