

LGA response to Major Road Network proposal

19 March 2018



About the Local Government Association (LGA)

The Local Government Association (LGA) is the national voice of local government. We work with councils to support, promote and improve local government.

We are a politically-led, cross party organisation which works on behalf of councils to ensure local government has a strong, credible voice with national government. We aim to influence and set the political agenda on the issues that matter to councils so they are able to deliver local solutions to national problems.

Summary

The LGA has called for a fairer balance in the way Government treats and funds the Strategic Roads Network (SRN), which makes up less than 3 per cent of the country's road network, compared to the local roads network, which makes the remaining 97%. The creation of the Major Roads Network is a step in the right direction. However, we have some concerns on the details of the proposals which we would like to work with Government to address.

We welcome:

- The new money being made available from the national roads fund.
- The recognition that longer term funding certainty will benefit local authority roads.
- The movement away from annual competitions as a means of funding major improvements.
- The involvement of sub national transport bodies in directing large scale investment in local road networks.

However we believe that there are some instances where the core principles and the details of the proposals appear to be in conflict. We have detailed instances below:

- A presumption against money being spent on local transport is the wrong approach.
- The development of this network should be aligned with the Road Investment Strategy and highway authorities, central government and Highways England should be joint partners in the whole network.
- Within a broad national framework, the network should be allowed to look different across the country to reflect local and regional circumstances and priorities.

Submission

We also believe that:

- There should be indicative regional allocations to aid areas plan what they will put forward for their programme.
- The DfT should agree to forward fund the production of regional evidence bases developed by Sub-National Transport Bodies (STBs) and other groupings of local authorities.
- Whilst out of the scope of these proposals, maintenance funding for local networks is still a significant concern for local highway authorities.

General Comments

The LGA welcomes the creation of a major road network (MRN) although the proposals could be improved to ensure that the implementation of the policy lives up to its potential. The MRN could be an opportunity to significantly improve the way we manage our significant local roads by taking a long term programme approach to ensuring there is a constant pipeline of investments. This approach would be best for local authorities, for the construction industry and for users of the network.

We believe that the proposals are a significant improvement on the way the Government provides existing funding for major local roads and could be further improved by some changes of emphasis and refinements of the process proposed above.

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

We agree with the core principles that have been included in the consultation. Rebalancing the economy and delivering more homes are priorities for the LGA across many policy areas and improving co-ordination across the road network, ensuring transport investment helps all users and tackling congestion are key parts of our wider calls for transport policy.

However we believe that the proposals will need some refinement in order to reflect these principles in practise. We also believe that the proposals would be improved by adding additional principles to bring them in line with those that underpin investment in the strategic network. These are economy, network capability, safety, integration and environment.

Reduce Congestion

We are very supportive of reducing congestion and agree that this should be a key principle guiding the major road network. We published a series of proposals for reducing congestion ourselves in 2017 which can be found here <https://www.local.gov.uk/tackling-congestion>. We would welcome greater focus on how technology and demand management approaches on the MRN could help us deal with congestion.

Support Economic Growth and Rebalancing

The LGA is supportive of the commitment to rebalance the economy and ensure that this is part of the delivery of the MRN. The Government should be flexible about the outcomes from investment in the MRN as for some local areas and regions it may be about easing congestion, but in other

places the important outcome is connectivity and rebalancing of local economies.

Support Housing Development

We support the principle of using these funds for unlocking housing land as there will undoubtedly be some schemes where infrastructure upgrades will improve housing delivery. However, road capacity will not be the primary constraint on housing delivery in most places.

Support all users

Local roads serve a range of road users, road funding should support all types of road users as is the case with the current RIS proposals. If schemes across reasonable corridors support the outcomes that the proposals are seeking we should not be overly proscriptive of the methods used. Prioritising one type of user may be beneficial for overall economic or congestions outcomes. The programme and network as a whole should seek to support all users including freight users, pedestrians and cyclists etc but should recognise which bits of the network will need to prioritise what types of traffic for the benefit of the network as a whole.

Support the SRN

We would welcome a change of tone and emphasis on the priority regarding the SRN. It would be better framed as an objective concerned with integration. The two networks should function seamlessly together. This means they need to be mutually supportive and means that Highways England (HE), the DFT, Highways Authorities and STBs should collaborate as equal partners to make this happen. The MRN is not an inferior part of the SRN and there should be a duty for all parties to co-operate for the best operation of the road network as a whole.

The resilience of the SRN could be improved by greater collaboration by Highways England (HE). HE has made significant improvement in collaborating with local authorities since the transition from the Highways Agency however given the investment that is being made it is vital that HE continues to increase this collaboration. Many of the roads included in the MRN will be diversionary routes from the SRN. This means that the ongoing works to improve the SRN will have a direct impact on this network. It is vital that the two programmes of work are co-ordinated to ensure the network remains resilient.

Other objectives

The RIS process includes commitments to improving the environment and safety for road users. It would be remiss if the MRN did not also make similar commitments. Whilst we know that the UK road network is one of the safest in the world we cannot afford to be complacent and should include commitment to continually improve. The network should also seek to improve environmental standards especially where air quality is concerned. Where these are identified as priorities for the regional evidence base they should be treated as equally valid objectives when assessing schemes.

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

We believe that many of the suggestions for both qualitative and quantitative criteria are sensible and form a good starting point for defining the network.

We welcome the acknowledgment that an objective list of criteria cannot adequately reflect the most important routes throughout the country where different conditions and circumstances will result in a network that suits different areas across the country.

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

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?

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

We are sure that different areas will make different proposals for how the network should look in their area reflecting local circumstances. We will not comment on what network will be appropriate but we would urge the department to consider two principles:

1. Defining the network should be an opportunity for all partners to agree proposals through dialogue. All partners should be given a voice to agree a mutually satisfactory network and the Department's role should not be to impose a centrally determined view.
2. Uniformity of networks should not be sought for its own sake. There will be diverse views on how the network should look in different areas with different types of road included in order to reflect local circumstances and the varied purposes that major local roads serve across the country. This should be accommodated as much as possible. The department should embrace this difference as the network will be performing different functions across the country. For example it seems logical that the network will not be the same in areas that have good coverage of the strategic network compared to areas that the strategic network does not serve.

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

We would like to see the MRN planning process aligned as far as possible with the road investment strategy (RIS) process. The original proposal for the MRN saw it as one network including the SRN. Whilst we can understand the Government's proposals limiting the MRN to local roads only we would welcome getting as close to the original proposals by aligning the processes of the MRN and the RIS with 5 year review programmes. This principle is acknowledged on p.26 of the proposals.

However the two year update of regional evidence bases proposed on p.30 will involve significant use of resources for little benefit. The review of the evidence should be aligned with the five year process to ensure that the programme results in a long term pipeline of investments. The regional evidence base is unlikely to change significantly over the course of two years and simply committing to a programme of improvements that is two years long will not maximise the benefits that we believe can be achieved by giving authorities long term funding certainty over this network to plan a comprehensive programme of improvements.

To what extent do you agree or disagree with the roles outlined for

local, regional and national bodies?

The proposals set out a significant shift away of allocating funding on a strict competitive basis, which we welcome. Competitions involve significant wastage and result in a stop start approach to improvement which will not help deliver a cohesive network. The LGA has called for greater long term certainty of funding for transport funds. Where this has been trialled, for instance through the RIS process, and the Greater Manchester transport fund, it has proved successful in reducing the risk of delivery of schemes and has provided long-term confidence for investors and infrastructure users.

We believe in particular that the process should be aligned with the RIS process and as far as possible this should be viewed as one process with opportunity for the decisions across both programmes to reflect each other.

As part of the construction of regional evidence bases and in advance of generating the evidence, each region should receive an indicative multiyear allocation. This will help STBs and local authorities to plan programmes as the level of resource available will influence the priority that schemes are given and should be known before money is wasted planning an evidence base for schemes that are not realistic.

Where the MRN interacts with major conurbations the only sustainable way to create extra capacity and reduce congestion is to dovetail with existing multi modal travel plans. The regional evidence base should take account of existing travel plans and look at how traffic flows on key corridors could be improved by diverting transport towards public and active travel.

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

Ultimately the DfT has retained control over the whole process and retained the right to act as ultimate arbitrator over proposals. We would urge the department to follow through on the logic of the proposals and see itself as an equal partner with local authorities, STBs and HE rather than the ultimate arbitrator. Decisions over how these proposals should be taken forward would be best made jointly in dialogue bearing in mind the requirements of the entire road network.

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?

We are pleased that the Government does not wish to dictate the implementation of STBs across the country. The process outside those areas should be managed by the authorities responsible and we welcome this approach.

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

The process of collating the regional evidence base will be a significant revenue expense that will fall on either STBs or directly on highway authorities. The consultation states that the department will engage with areas to discuss their needs but we would welcome a commitment to fund the evidence bases. Local authority budgets are severely constrained,

especially when it comes to revenue funding, as a result of reductions in Government funding and ongoing demand-side pressure from statutory services. It would be difficult to take on extra revenue commitments at this time.

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

HE has a potential conflict with its own priorities which may not be the same as the local authorities who will manage their roads in these areas. We are concerned about the statement that “Highways England could have a role in the governance of the MRN Investment Programme” and “Highways England could support the Department in analysing the Regional Evidence Bases in order to prepare advice to Ministers on the MRN Investment Programme”

HE also lacks expertise in running networks of this nature. Knowledge and experience in running a national strategic network does not necessarily translate into the skills and knowledge needed to plan local roads, even ones as strategically significant as the proposed MRN. As we have stated we would envisage the production being a co-production between the various stakeholders and envisage HEs role being part of this. Their role in this co-production should take place by honest and upfront engagement with STBs and regional groupings rather than a role evaluating schemes.

Do you agree with the cost thresholds outlined?

The eligibility criteria are helpful in that they give authorities a clear idea what the additional funding is for. However they should remain as guidelines rather than hard and fast rules as there will be exceptions where they will not be appropriate. There are also some specific areas where we disagree with the criteria put forward.

Firstly it should be stated that we support the decision to retain the maintenance block however as things stand this money is not adequate to maintain the local network (including the roads that will make up the MRN) in a steady state. Consistent standards of roads across the network are part of the original Rees Jeffrey proposals and we understand why they have not been taken forward by the department at this time. If this is an issue that the Government wishes to revisit in the future, especially considering the network condition data that will be collected, it is important to recognise the financial pressures local authorities face. There is currently a £12bn maintenance backlog as identified by the ALARM survey. We must ensure that the maintenance of the local road network is adequately funded before we can have a meaningful discussion about common and improved standards across the MRN.

We believe that the current eligibility guideline figures of schemes needing to be between £20m and £50m risk not satisfying the needs of the programme. It is unlikely that significant new stretches of road or major improvements will be funded for less than £50m.

At the same time, it may be that a package of smaller improvements may prove to be unrealistically comprehensive or cover a very wide geographical area in order to reach the £20m threshold. We very much welcome the inclusion of large capital renewal schemes within the programme but setting the £20m criteria means that a large stretch of road

would have to fail at the same time in order to qualify, which seems unlikely.

These amounts may not reflect the reality of types of programmes envisioned and we would welcome them being regarded as merely guidelines with flexibility. Whilst we understand the inclusion of these figures to make the point that this programme is intended for large schemes, it would be disappointing if they discouraged authorities from suggesting schemes that fell outside the criteria but otherwise delivered on the objectives of the programme.

Do you agree with the eligibility criteria outlined?

As we have stated very clearly throughout we would welcome the presumption against this money being used for public transport improvements being removed.

We are sceptical that simply building more and bigger roads will deal with congestion problems everywhere. In the list of eligible schemes four of the six examples given involve major road building. This will not be appropriate in all areas the MRN covers. For example it is also not practical to engage in significant road building in dense urban environments where the problems of congestion are most acute. The department should welcome a range of potential solutions and focus on whether the solutions proposed deliver against the objectives rather than whether it fits a list of pre-approved solutions.

We are also concerned that the presumption against using MRN funding to improve public transport is in direct contradiction with the idea of improving congestion. Increasing public transport capacity and encouraging modal shift towards public and active travel is the only realistic option for dealing with congestion in many areas. A presumption against public transport funding for this network is not helpful.

We understand the principle of a local contribution but would once again restate the difficult financial position that local authorities find themselves in. We would like the contribution to be viewed as a contribution to the package as a whole and not done on a scheme by scheme basis. This is because the ability to access third party funds or local resources will vary by the type of scheme considered. A scheme that unlocks significant development land may have obvious additional sources of funding through the land value increases and economic activity it will unlock. Major programmes of improvements for existing assets may be more difficult to fund. A flexible programme wide approach will allow these problems to be balanced out across the programme as a whole.

It is also not clear how local growth funding and arrangements for capturing planning gain will be organised in the long term. This uncertainty should be factored into any proposals for local authority contributions.

Do you agree with the investment assessment criteria outlined?

We welcome the idea of establishing a base line assessment for the condition of these assets as part of the process of collecting a regional evidence base. However we would restate the difficulty of local authorities funding this exercise without additional resource. The current amount of maintenance funding available means it will be difficult to maintain

standards over the long term let alone improve them.

This evidence base will allow us to work together to improve standards over the network in the long term, but the only way we can do this is with more funding.

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.

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

The proposals overall are ambitious and welcome. However STBs still exist mostly in a shadow form, and as the Government see them as being the primary body for engagement on the development of the MRN, it is important that the resources and capacity of formative STBs and regional groupings are recognised and financial support is made available for them to work.