

DfT consultation, December 2017: 'Proposals for the creation of a Major Road Network'

Transport Planning Society response to consultation

1 Introduction

- 1.1 The Transport Planning Society (TPS) aims to facilitate, develop and promote best practice in transport planning and provide a focus for dialogue between all those engaged in it, whatever their background or other professional affiliation. TPS was established, and continues to be supported by four professional societies with an interest in the subject: the Institute of Civil Engineers, the Chartered Institute of Logistics and Transport, the Chartered Institution of Highways and Transportation, and the Royal Town Planning Institute.
- 1.2 The TPS has over 1400 individual members and corporate membership which includes many of the major consultancies that undertake transport work. The TPS has developed the widely-recognised qualification of Transport Planning Professional, the only such qualification in the UK and internationally regarded as an exemplar.
- 1.3 The TPS conducts regular surveys of its members' views on major public policy issues in the field of transport planning, and these inform this response. The following broad and strongly held strands of opinion are particularly relevant to the present submission:
- The recognition that transport needs and provision must be seen in the wider context of its economic, social and environmental impacts;
 - The crucial importance of a strategic sense of direction for efficient long-term planning and investment; and
 - The strong relationship of transport to spatial (land-use) planning.
- 1.4 Our vision is that transport planning should contribute to making places that are not only well-connected, but also attractive, productive and sustainable.

2 TPS perspective on the Major Road Network (MRN) proposal

- 2.1 The TPS has responded to other recent consultations with a bearing on the present proposals for a MRN. These include DfT's consultation on the future programme of investments (RIS2) in England's Strategic Road Network (SRN), and DCLG's consultations on the Housing White Paper and proposals for setting housing needs targets at District level. We pointed out:
- The need to manage traffic growth generated by capacity increases on the SRN, to integrate local proposals that would help reduce traffic, and to avoid encouraging a more dispersed and less sustainable pattern of land-use.
 - Housing policy aims to increase the number of new homes built each year by releasing more land. This additional land is almost entirely greenfield, which diverts resources from brownfield development and the regeneration of existing homes in towns and cities. Since 90% of housing choices are met by churn of existing homes and only 10% by new, we showed that the overall effect of current policy is both to reduce housing choice and to increase transport demand.
- 2.2 We are concerned that the proposals for the MRN will have the effect of prioritising inter-urban road improvements over wider intra-urban transport needs, exacerbating these problems. In addition to any such redirection of central funding, we see a risk that local authorities will be incentivised to spend more of their own funds on the MRN (given the

attraction of Government support) than on the same roads now, leaving reduced levels of funding for purely local schemes.

- 2.3 On a wider issue, much hinges on government management of the network and its influence on local traffic movements. For example, will the government be willing to fund schemes on the MRN designed to increase MRN capacity and divert traffic away from less suitable local roads. More information is needed about how government management strategy for the MRN will differ from local authority strategy for the same roads currently entirely under their control.
- 2.4 The proposals appear to have been developed without considering the possibility that they will result in more dispersed housing and labour markets, and longer supply chains. This incurs risks of loss of urban agglomeration economies, and of generated traffic dissipating the initial benefits from reduction of congestion.

3 Structure of responses

- 3.1 The consultation paper seeks responses to 16 specific questions under five main headings:
1. Core principles (Section 4, Question 1)
 2. Defining the MRN (Section 5, Questions 2-6)
 3. Investment planning (Section 6, Questions 7-11)
 4. Eligibility & investment assessment (Section 7, Questions 12-15)
 5. Other considerations (Section 8, Question 16).
- 3.2 This response groups our comments in the same order, but focuses on the specific questions most relevant to our concerns.

4 1. Core principles

- 4.1 The 'Core principles' describe the scope and administrative function of the MRN plan and programme rather than its function.

Question 1: do we agree with the Core Principles?

- 4.2 The crucial points from our perspective are that they stake a claim for a long-term funding stream, and reserve decisions about both the extent of the MRN and scheme priorities to the Secretary of State. In the context of current and future public expenditure prospects, these points have implications both for the distribution of resources between headings, and the locus of decision-making.
- 4.3 We have strong reservations on both counts:
- We have already commented on the effect of the implied shift of resources from intra urban transport to inter-urban roads. We consider that this will drive wider dispersion of locational choices by both households and businesses, primarily by churn within the already existing stocks of buildings, but exacerbated by current housing and spatial planning policies for the location of new development. This will generate additional traffic, negating initial improvements in inter-urban access.
 - The reservation of decision-making to the Secretary of State undermines the capacity of local planning and transport authorities to collaborate in more integrated transport and spatial transport policies at 'wider than local' levels. The emerging strategies of Combined Authorities and Transport Boards for transport, economic development and housing already lack coherence because they track back to separate central funding sources. Transport Secretaries, past and present, have used major road funding as form of political patronage¹, and this proposal would

¹ Local Transport Today (740, 2 February 2018), 'DfT's large local majors fund goes to Tory constituencies'. The £429m so far awarded has gone to constituencies where the local Conservative MP was a vocal supporter.

permit that practice to continue. Not only does this inhibit good local policy-making, some of the decisions are poor value for money even by DfT's own appraisal criteria.

4.4 These points are developed further under subsequent headings.

5 2. Defining the MRN

5.1 The MRN is defined primarily in terms of traffic flows above a 'defined level'. Curiously this level is not stated in the consultation paper, though the 'indicative' MRN must embody such a definition. The MRN consultation references the Rees-Jeffreys Road Fund (RJRF) study with the same title, and this set the level at an AADF >20,000 (or >10,000 as long as the proportion of HGV traffic was at least 5%, or of LGV traffic at least 15%).

5.2 In addition to this quantitative criterion, a range of more qualitative criteria were applied: adding links necessary for a 'coherent network'; removing isolated lengths; ensuring links to airports, ports and places over 50,000 population; and adding links thought necessary for resilience in case of disruption of the SRN. The extent of the RJRF network was 8,000 miles (including the 4,400 mile SRN, managed by Highways England (HE)). The 'core principles' separate off the SRN, so the implied length of MRN is some 3,600 miles – though this figure again does not appear. However, the resulting maps are very similar (though with a few extra links, perhaps representing the 'resilience' criterion).

Question 2: Quantitative criteria

5.3 We have major concerns about the dominance of existing traffic levels as the basis for the MRN definition. The failure to consider and differentiate between the purposes that such traffic may be serving seems to undermine the idea that the MRN expresses vital underlying functions of wider than local importance.

5.4 Without such distinctions, the underlying policy becomes 'predict and provide' applied to links meeting the chosen thresholds. As pointed out in our response to the SRN consultation, unless there is effective management of demand, traffic growth (including that generated by the improvements themselves) will erode the initial benefits.

Question 3: qualitative criteria

5.5 The purpose of the MRN is stated as being strategic, but the extent and nature of the network is not directly influenced by the origins, destinations and purposes of travel. We may speak of the 'circulation of traffic', but the implied similarity with the circulation of blood is misleading. Vehicles are independently mobile units, are not driven by a common vital purpose, and the number and identity of those in circulation is not constant. Even on motorways, a large proportion of the traffic is making short journeys or only using short sections of the route. Such traffic significantly impedes any strategic purpose that depends on facilitating longer distance connections.

5.6 It is unsafe to assume that a continuously high volume of traffic along a route implies continuity of journeys or a strategic purpose. The qualitative criteria favouring continuity may be justified in some circumstances, for example where there is a polycentric cluster of economically interactive centres, or where a centre of production is particularly dependent on a port or airport for personnel or materials. However, drawing links purely for continuity, without understanding the actual purposes of the traffic using them is potentially wasteful 'helicopter planning'. There are examples of this on the indicative network (see response to Question 5 below).

5.7 While there is some logic in including links for connectivity purposes or as diversionary routes to improve resilience of the SRN, it is unclear how the Business Case for improvements to such links would be made under normal WebTAG criteria. How would improved resilience of the SRN be valued, for example? A new methodology will be needed to identify the true value of such links

Questions 4 and 5: Does the consultation network identify all sections of road that should be included in the MRN? Are there sections that should not be included?

5.8 Without an alternative data base it is difficult to comment on specific links in the light of the criticisms made above, but there are some categories for which it is hard to envisage a strategic rather than primarily local purpose. Giving such routes preferential access to improvement funding runs strong risks of unintended side effects (discussed in relation to Questions 7-10 below).

- In many places MRN status is proposed for routes accessing local centres from the SRN (for instance, small non-port towns along the south coast like Bosham, Bognor, Hastings, Romney).
- In contrast major conurbations, including London, have much sparser MRN proposals. This may appropriately reflect better provision of public transport, though that does not appear amongst MRN criteria, and begs the question about the relationship with interurban rail elsewhere.
- Similarly, there are many long cross-country strands of MRN, beginning and ending in sizeable places but far more likely to be used mainly for local purposes by much smaller places in between (eg Cheltenham-Oxford, Kidderminster-Tenbury (Ludlow), Stoke-Shrewsbury, Eastbourne-Hastings-Ashford).

Question 6: Future reviews of MRN

5.9 It is proposed to review the MRN every five years, to coincide with the RIS cycle for the SRN.

5.10 While there is logic in this approach, we would note that continuity will be important to network stability and return on long-term investments.

6 3. Investment planning

6.1 It is proposed that LAs, LEAs and RTBs should collaborate to produce a Regional Evidence Base, and on this basis identify common issues and priority corridors. Decisions on funding support for MRN schemes would be central, but responsibility for delivery would be local, and local contributions to the cost would normally be required.

Question 7: Do you agree with the roles for local, regional and national bodies?

Question 8: What additional responsibilities, if any, should be included? At what level?

Question 9: Regional groupings to support the investment planning of the MRN in areas where no sub-national transport bodies (STBs) exist?

6.2 In many respects the funding regime is similar to the Regional Funding Allocations operated 2004-2010. This has its merits, but these are compromised by the context:

- the scope is MRN-specific, rather than including other aspects of transport or other sectors such as housing;
- the proposed Regional Evidence Base would exist in isolation from any other region-specific institutional, planning or legislative basis.

6.3 Carving out a dedicated funding stream for MRN, defined in the terms proposed, would shift the overall transport funding balance in favour of improving inter-urban roads. Past failures to improve intra-urban transport has fuelled a process of dispersion of urban critical mass (de-agglomeration) in the UK since at least the 1960s, and this risks making matters worse.

6.4 The 1996 RJRF 'New Realism' study expressed a consensus in favour of new approaches to manage travel demand and a focus on transport's wider and longer-term aims. The SACTRA report on Transport and the Economy (1999) showed that time-savings from congestion reduction are converted into changed patterns of location and travel, and are

tradition of better integrated, planned and funded intra-urban transport (which also contributes to London's relative success in these terms - +40% on the same metric)².

- 6.9 We therefore consider that the Regional Evidence Base for transport planning purposes (including MRN) should cover a wider range than the proposed focus on network condition and performance, network-wide issues and solutions, and the potential and sequencing of interventions. At a minimum it should include information and analysis relevant to the interaction of transport with spatial and place-making aims (economic, social and environmental).

Question 11: Do you agree with the role that has been outlined for Highways England?

- 6.10 It is proposed that Highways England could provide programme support to DfT and technical advice and delivery support to LAs. We have no comment on this proposal.

7 4. Eligibility and investment assessment

- 7.1 MRN funding will be separate from Highway Maintenance and Transport Block funding to local authority roads (which include work on the MRN), and is to be '*targeted towards significant interventions that will transform important stretches of the MRN*' (eg by-passes, missing links, widening, major structural renewals and junction improvements, VMS signing, and corridor packages). Bids for funding contributions are expected to be in the range £20-50m, up to a maximum of £100m. Schemes that form a link to the MRN or are wholly on the SRN will not be eligible, nor will public transport enhancements or LA-wide MRN funding pots.

Question 12: Do you agree with the cost thresholds outlined?

Question 13: Do you agree with the eligibility criteria outlined?

- 7.2 We have commented in response to Questions 1, 2, 3, 7, 8, 9 and 10 on the impact on other transport priorities of defining a new transport funding stream for the MRN. We note that no indication of the amount of such funding is given in the consultation, and without this it is difficult to know how significant such impacts might be. However, it is clear that central earmarking of funds in such a way interferes with the local decision-making that is important to integrating transport with other place-making actions.

Question 14: Do you agree with the investment assessment criteria outlined?

Question 15: What, if any, additional criteria should be included in the proposal?

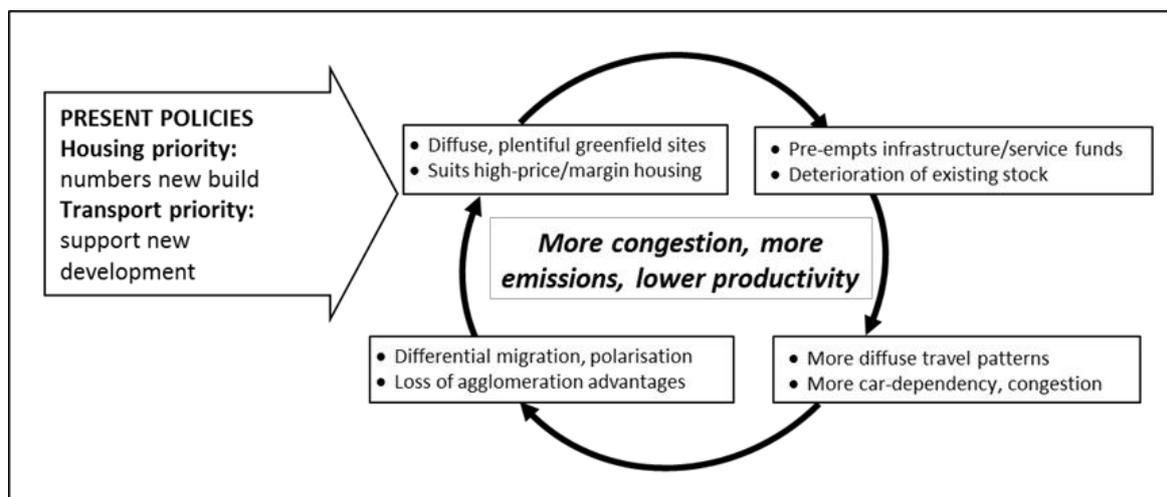
- 7.3 The investment criteria (congestion reduction, environmental impact, economic growth, housing delivery, safety, non-motorised users, end-to-end SRN and MRN journey times, reliability and resilience) broadly follow WebTAG, though with some significant variations.
- 7.4 **Congestion reduction:** Our main comment is that the focus on user time savings that comes with the WebTAG methodology increases our concern that the effect of MRN designation will be to reinforce the tendency to 'predict and provide' as the main driver of investment priorities. As noted in our responses to Questions 12 and 13 this interferes with the local decision-making that is important to integrating transport with other place-making actions.
- 7.5 **Economic growth:** the criterion now includes reference to industrial strategy and rebalancing, and a 'Rebalancing Toolkit' has been published alongside the MRN consultation. The main section of the 'Toolkit' (Part 1) is devoted to scheme level examination, so by definition cannot address inter-regional imbalances. We would comment that Part 1 adds nothing to existing WebTAG units on 'wider economic benefits', which in practice depend heavily on interpretation (and factoring up) of user time savings.

² M Parkinson (2011), '*Secondary Cities in Europe: Performance, Policies and Prospects*' – Presentation of ESPON research

This adds little of value in terms of understanding the dynamics of local economic growth, or contributing to it.

- 7.6 Potentially more significant is that Part 2 deals with rebalancing programmes between regions, taking into account the balance of spending per capita, options and strategic alternatives, the impacts on regional imbalance (now and in the future), and the attitudes of key regional stakeholders. We would comment that the proposed criteria should be applied to the MRN proposal itself, and that it is clearly the responsibility of DfT to do so.
- 7.7 **Housing delivery:** support for this aim is placed next to economic growth and rebalancing, clearly implying a high priority. TPS has commented in response to MHCLG consultations³ that because housing policy to improve affordability depend heavily on additional homes for sale it will have very serious transport implications. Our submission demonstrated that provision of land is proposed that in aggregate exceeds effective demand for viable development. This will increase travel demands, both through dispersion of new homes and, to a much greater extent, changing occupancy of existing ones ('churn'). This risks swamping the benefits of even the best practice integration of transport within new developments at the local level.
- 7.8 Urban regeneration and social housing provision have more important roles in meeting housing needs than additional homes for sale⁴. Urban regeneration, particularly where well-integrated with public transport provision has an important role in counteracting the growth in transport demand, whereas making housing delivery a key aim of MRN improvements will drive dispersion. Because of their significance to transport we append both submissions to this response.
- 7.9 Some hope that the planning system can limit the damage done by dispersion driven by inter-urban roads. This is not the case, because 90% of housing choice is accommodated by 'churn' of existing properties, and is largely immune to planning. Figure 2 below is taken from our response to the Housing White Paper.

Figure 2: Effects of current housing and transport policies – a vicious circle



- 7.10 We drew particular attention in our response on Planning Policy Guidance *'The right homes in the right places'* to the implications for transport of the effects of:

³ TPS responses (May and November 2017 respectively) to DCLG consultations on the Housing White Paper (*'Fixing the broken housing market'*) and Planning Policy Guidance (*'The right homes in the right places'*).

⁴ New market housing is mostly aimed at existing owner-occupiers, and priced well above levels affordable to first time buyers. Around 80% of newly forming households over the next 20 years are currently under 25, and their needs are met mainly by lower priced existing stock. Benefits to them from new build depend largely on the vagaries of 'trickle down'.

- a) Estimating housing needs at individual District level rather than wider Housing Market Areas, preventing coherent planning of transport for labour markets;
 - b) Long-term commitments to land on the basis of volatile projections inhibiting efficient planning and provision of infrastructure and services that require longer lead times, such as transport;
 - c) The use of the ratio of workplace house prices to incomes as the indicator of 'affordability' for the purpose of adding housing provision for 'market signals'.
Dormitory suburbs typically have expensive houses and few (and poorly paid) jobs, so these would have the highest ratios and be required to add most housing. Unless this is social housing, these homes will remain unaffordable to local workers (as builders price for the existing market), and will increase commuting in vicious circle.
- 7.11 We pointed out that there is a serious risk of 'good' transport policies adding fuel to the fire. The scenario already being played out in London (and to some extent other conurbations) is that high-priced ex-urban housing will attract highly paid commuters to the centres London, encouraged by public transport improvements. Meanwhile genuinely affordable and social rented housing nearer the centre is being replaced by high density but high rent investor housing, with the present inhabitants (often working locally in lower paid jobs) being displaced to cheaper but more distant suburbs. Most of these movements will be accommodated by churn of existing homes rather new building, generating additional transport demands on both road and rail.

8 5. Other considerations

Question 16: Is there anything further you would like added to the MRN proposals?

- 8.1 We have no other comments