

THE RT. HON. ANDREA LEADSOM MP



HOUSE OF COMMONS

LONDON SW1A 0AA

MRN Consultation
Department for Transport
2/15 Great Minster House
33 Horseferry Road
London
SW1P 4DR

16th March 2018

Ref: AL/TG/1803

To whom it may concern,

RE: Proposals for the creation of a Major Road Network – Open Consultation

I am writing to you to formally submit my response to the Department for Transport's consultation on proposals for the creation of a Major Road Network.

Please find my comments broken down into sections: introduction; core principles; defining the network; investment planning; eligibility & investment assessment criteria; other considerations; conclusion.

I have also included the ten specific points that have arisen from my consultation response at the end of this document.

I confirm that I am responding in my capacity as the Member of Parliament for South Northamptonshire and on behalf of my constituents.

With best wishes,

A handwritten signature in blue ink that reads "Andrea Leadsom".

The Rt Hon. Andrea Leadsom MP
Member of Parliament for South Northamptonshire

Cc: Jesse Norman MP, Parliamentary Under Secretary of State for Transport
Hilary Chipping, Acting Chief Executive, South East Midlands Local Enterprise Partnership
Cllr Ian Morris, Transport Portfolio Holder, Northamptonshire County Council
Cllr John Grant, Traffic Portfolio Holder, Farthinghoe Parish Council

Member of Parliament for South Northamptonshire



**Submission by the Rt Hon. Andrea Leadsom MP to the Department for Transport's
consultation on the proposals for the creation of a Major Road Network**

1. Introduction

- 1.1 I wholly welcome the Government's commitment to create a Major Road Network (MRN) which will complement the existing Strategic Road Network (SRN). I agree that the creation of the MRN will help meet the five central policy objectives identified by the Transport Investment Strategy: reducing congestion; supporting economic growth and rebalancing this across the regions; supporting housing delivery; supporting all road users; and supporting the SRN.
- 1.2 I am pleased that the consultation proposals have built upon the work of the Rees Jeffreys (RJ) Road Fund report, *A Major Road Network for England*, published in October 2016 which identified the need for a designated, coherent network of major roads, including but not limited to the SRN, with good connectivity and geographical coverage.¹
- 1.3 It is clear that the busiest roads in the existing local authority network deserve special recognition because of their importance to the economic wellbeing of regions and to the country as a whole. The busiest 4,400 miles of the local road network (approximately equivalent to the total length of the roads within the SRN) carry around 16 per cent of all traffic in England.²
- 1.4 Whilst significant reforms have been undertaken for the national SRN through the new network operator Highways England, planning and funding certainty through the Roads Investment Strategy process, and an independently monitored rigorous performance regime, no equivalent has been applied to arrangements for any part of the local road network.³
- 1.5 The RJ Report correctly highlighted that many of these regionally important roads cross numerous local authority boundaries, and that their management can be inconsistent as different local authorities take different approaches to different stretches of the same road. These major roads require more consistent and coordinated management than the rest of the local road network.
- 1.6 Although my comments in this submission to the consultation apply to the MRN proposals at large, I am responding specifically in relation to the A422 which connects Bedford and Worcester. The road passes through the south-west of my constituency between junction 11 of the M40 on the outskirts of Banbury and Brackley, and has been included as part of the proposed MRN on the indicative consultation map. The road forms a vital link for road users travelling between the M1, A5, A43 and M40, and is an integral part of the Oxford – Milton Keynes – Cambridge corridor.

¹ A Major Road Network for England | Rees Jeffreys Road Fund | October 2016

² Development of a Major Road Network | pg. 47 | Transport Investment Strategy | Department for Transport | July 2017

³ Ibid.



- 1.7 Supported by Northamptonshire County Council (NCC) and the South East Midlands Local Enterprise Partnership (SEMLEP), I have considered the MRN proposals in the context of whether the National Roads Fund could deliver a much-needed bypass for the village of Farthinghoe situated on the A422 in my constituency, should a future bid to the Fund be considered. I also have the support of the local parish council and many local residents.
- 1.8 I have also considered whether the proposals could further facilitate the early delivery of a relief road for Towcester which would be fit for purpose and allow for the removal of through-traffic from the town centre. Additionally, I have looked at the proposals to see if they would support a bypass for the village of Roade on the A508.

2. Core Principles

- 2.1 It is vital that the MRN is able to deliver on its core aim of providing funding certainty to roads in the network through the use of the National Roads Fund. There are examples of many roads in South Northamptonshire, and in other constituencies, which are deserving of investment and upgrade works but which fall too low in the overall priority list of the relevant local authority.
- 2.2 I agree that local and regional bodies should play a key part in developing and applying the criteria for the MRN in their area. Local authorities and parish councils have specific knowledge about traffic flows and incident hot-spots that must be incorporated into proposals, and I would encourage wide engagement at all levels.
- 2.3 I agree that MRN funding must bring about improvements in standards and performance across the network, and that investment must therefore focus on enhancements and major renewal schemes. I am encouraged that bypasses or other alignments to relieve congestion in villages and towns are specifically referred to as the types of schemes that would be eligible for funding.
- 2.4 The links between the MRN and SRN, as well as into the wider local authority road network, are vital and there must be oversight at a national level by the Department with consent from the relevant local authorities. Work to improve the MRN should not adversely affect the SRN, and vice versa.

3. Defining the Network

- 3.1 I support using current traffic data as the starting point by which to identify those roads that should be considered for inclusion in the MRN, as well as evidence from local and regional partners concerning spatial variations, as part of the methodology of defining the network.
- 3.2 However, if upgrade and investment works are undertaken on a particular road or stretch of road, **I would ask if it would be worth considering projected traffic growth.** Whilst I note that the proposals specifically reject attempts to 'future-proof' the network, it would seem opportune to ensure capacity is expanded to prevent communities being further disturbed by works at a later date.



- 3.3 The proposals state that the MRN must be consistent and coherent across the country when considered alongside the SRN, specifically adding links to join up stretches that meet the traffic thresholds to form continuous stretches of road.
- 3.4 I note that the indicative map is not the final proposal. On this point, **I would ask why Hennef Way (the route the A422 takes in Banbury from junction 11 of the M40 to the roundabout with the A423 Southam Road) is not included as part of the MRN.** If we are considering a coherent network that links economic centres and adds resilience for and access to the SRN, then Hennef Way should be added to the proposals. Otherwise the MRN in this area would result in a series of fragmented road links.
- 3.5 As the MP representing Banbury, I know that my colleague Victoria Prentis would support including Hennef Way in the MRN, and **I would encourage the Department to undertake further consultation with local representatives – including parish councils and road users – before publishing the final agreed network.**

4. Investment Planning

- 4.1 The Secretary of State for Transport has previously advised that it would be advantageous for NCC and SEMLEP to work together on a future bid through the National Roads Fund to deliver a bypass of the A422 through Farthinghoe. I therefore welcome the proposals that, where Sub-national Transport Boards have yet to be formed, local authorities and local enterprise partnerships should jointly agree to deliver investment and upgrade works.
- 4.2 Following public consultation and further to discussions with SEMLEP, NCC has confirmed that the Farthinghoe bypass should follow a northern route. The scheme has been added to NCC's list of major projects, and falls within the council's county-wide transport strategy.
- 4.3 This meets the Department's aspiration for local authorities and local enterprise partnerships to work together within their regions. As Cllr André Gonzales De Savage, NCC's portfolio holder for strategic infrastructure and economic growth, has said: *"There is quite a severe congestion problem in the village of Farthinghoe due to the road width being insufficient for two HGVs to pass, and this will be exacerbated by the level of development proposed in Banbury and Brackley. The challenge still remains to find funding for the project in a time when there is little money available nationally."* The MRN and the investment from the National Roads Fund is vital to deliver upon these regional needs.
- 4.4 I note that the proposals outline that MRN funding will principally be focused on the development and delivery of schemes accepted for development as part of the MRN Investment Programme. **I would ask that the detailed design work, including technical and environmental assessments, for schemes will also be included in the MRN funding,** as this is not immediately clear in the consultation documentation.
- 4.5 The proposals also state that there should be a requirement for local contributions towards the final cost of the scheme. Whilst I understand the Department's rationale that this will act



as an incentive to ensure that agreed schemes are delivered to programme and to budget, this may be prohibitive to local authorities that are fiscally challenged. **I would ask what specific level of contribution will be required: match funding, a percentage of the total cost of the scheme, or other.**

- 4.6 On the role of Highways England, it is suggested that this could involve governance of the MRN Investment Programme, and supporting the Department in preparing advice to Ministers on whether to green-light specific schemes. It is important that Highways England is not able to wield a veto on projects entering the MRN pipeline, and **my constituents have asked that any advice given to Ministers is transparent and available in the public domain.** Given Highways England's focus on and remit over the SRN, it would be most improper if proposals for the MRN were blocked or assigned a lower priority because they conflicted with the Roads Investment Strategy.

5. Eligibility & Investment Assessment Criteria

- 5.1 I am concerned that the proposals only allow for the funding of projects with a capital requirement greater than £20m; this would prevent lower value schemes coming forward which may be good value for taxpayer money. There are various improvements that could be made to the A422 and the A508 in my South Northamptonshire constituency, such as variable message signs or other technology schemes, which would come in below the cost threshold and would therefore not otherwise be viable.
- 5.2 I am aware that these concerns are shared by NCC which has stated that a cost threshold of £20m *"is likely to mitigate against good value for money schemes of lower value can be delivered, such as pinch-point schemes or the relief of bottlenecks. Other sources of funding available are focused on 'wider' issues such as growth or housing delivery rather than the effective operation of the road network, so purely 'transport' schemes may not be eligible. Furthermore, such funding sources have no certainty that they will continue in the future. The limited amounts available via Local Transport Block Integrated Transport Funding mean that it is difficult to fund any scheme over £1m from that source."*
- 5.3 Department guidance has previously stated that, in order to qualify for major scheme funding, the total cost of the scheme (including preparatory costs between Programme Entry and Full Approval) must be at least £5m.⁴ **I would ask that this guidance is upheld for MRN funding through the National Roads Fund.**
- 5.4 I support the steer that scheme promoters should work to minimise costs through optimisation and the securing of third party contributions. I return to my earlier point on the benefits of future-proofing the network by incorporating forecasted traffic growth. **I would also ask specifically if the HS2 Community & Environment Fund and the HS2 Business & Local Economy Fund would be considered as appropriate third party contributors for schemes along the A422 which will be badly affected by HS2 construction traffic.**

⁴ Minimum Cost Threshold | pg. 6 | Guidance for Local Authorities Seeking Government Funding for Major Transport Schemes | Department for Transport | 2007



- 5.5 As noted earlier, I am delighted that bypasses or other alignments to alleviate congestion in villages and towns are included in the types of schemes that would be eligible for funding. In addition to the long-overdue Farthinghoe bypass for the A422, **I would ask if MRN funding could be used to support the delivery of the Towcester Relief Road.** The Department is very aware of the issues surrounding the early delivery of this relief road and the current requirement for the developer to sell 1016 houses before the road is completed. Funding support through the National Roads Fund would ensure that the road is designed and built to a standard which would allow for it to achieve the locally-set aims of removing all through-traffic from the centre of Towcester, improving air quality in the town, and easing the bottleneck along this stretch of the A5 Watling Street for all road users.
- 5.6 I note that schemes that are wholly on the SRN will not be considered for MRN funding unless there is a compelling case that the benefit is of a distinct local sub-national nature that would not warrant consideration through the Roads Investment Strategy process. Although some funding has been allocated to the Towcester Relief Road through this process, I would wholly support the consideration of further funding for this road, and the subsequent realignment of SRN and MRN status through trunking and de-trunking once complete, given that its delivery, fit for purpose, is of vital importance to the local and regional economy.
- 5.7 The proposals include schemes that incorporate packages of improvements along a stretch of road or corridor where a known issue has been identified. **I would ask how far apart these improvements can be along a stretch of road** i.e. could two improvements in different local authority areas at either end of a relatively long road be included under one package? What would the minimum thresholds and other requirements be for packages of improvements?
- 5.8 Under the MRN Investment Assessment criteria:
- a) The Support Economic Growth & Rebalancing objective should include distribution hubs as a consideration for improving international connectivity;
 - b) The Support the SRN objective includes improving journey time reliability – I would suggest that journey times should be reduced regardless of the interaction with the SRN.

6. Other Considerations

- 6.1 The proposals state that Highways England will take on a significant role in shaping the MRN programme. Given that the role of Highways England in the MRN is currently subject to consultation, this statement is premature. I would ask that my previous points on Highways England be taken into consideration.
- 6.2 The underlying principle on all the MRN proposals is that they must be capable of supporting and delivering on local priorities for transport infrastructure. Community-led bottom-up development is vital for the MRN and must originate from within the local and regional areas.



7. Conclusions

- 7.1 I am wholly supportive of the proposals contained within the consultation on the creation of a Major Road Network, and welcome the opportunity to target investment on some of our most economically important local and regional roads. These routes have had the misfortune of sitting just below those within the Strategic Road Network, and not being able to benefit from ring-fenced funding beyond that which is available for the plethora of other local authority roads.
- 7.2 The new MRN will correct this imbalance, and allow local authorities to support the roads that are heavily used and in need of investment and/or improvement. As noted previously, these roads deserve special recognition because of their importance to the economic wellbeing of regions and to the country as a whole.
- 7.3 The specific points I have made on the proposals, as outlined in my consultation response above, are as follows:
- i. Projected traffic growth should be considered to future-proof the network when undertaking investment in improvement works, thus ensuring scheme optimisation and overall lower costs to the taxpayer;
 - ii. Hennef Way should be included as part of the MRN;
 - iii. Further consultation with local representatives and road users should be undertaken before publishing the final agreed network;
 - iv. Detailed design work, including technical and environmental assessments, for schemes should also be included in the MRN funding;
 - v. Details on specific levels of local contributions should be outlined;
 - vi. Advice given by Highways England on the development of the MRN pipeline should be available in the public domain to ensure confidence that there is no conflict of interest with the SRN;
 - vii. The funding threshold for MRN schemes should be lowered from £20m to £5m;
 - viii. Contributions from the HS2 CEF and BLEF funds should be considered as appropriate third party contributors for schemes in areas affected by HS2 construction traffic;
 - ix. MRN funding should be able to support projects on the SRN and supplement funding provided through the Roads Investment Strategy;
 - x. Requirements for packages of improvements schemes should be further detailed.
- 7.4 I look forward to the MRN being established, and I will be supporting schemes in my South Northamptonshire constituency that are seeking funding through the National Roads Fund, including but not limited to the:
- a) Farthinghoe Bypass (A422)
 - b) Towcester Relief Road (A5)
 - c) Roade Bypass (A508)

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