

Proposals for the creation of a Major Road Network

1. Introduction

As part of the Transport Investment Strategy, the government announced that it would take forward proposals to create the Major Road Network (MRN).

This middle-tier of economically and strategically important local authority 'A' roads will sit between the nationally-managed Strategic Road Network (SRN) and the rest of the Local Road Network. These roads will benefit from targeted funding available through a share of the National Roads Fund, with the aim to improve productivity and connectivity in our towns and cities.

In creating this network, the government has 5 central policy objectives. These are:

- **Reduce congestion** – alleviating local and regional congestion, reducing traffic jams and bottlenecks.
- **Support economic growth and rebalancing** – support the delivery of the industrial strategy, contributing to a positive economic impact that is felt across the regions.
- **Support housing delivery** – unlocking land for new housing developments.
- **Support all road users** – recognising the needs of all users, including cyclists, pedestrians and disabled people.
- **Support the SRN** – complementing and supporting the existing SRN by creating a more resilient road network in England.

This consultation seeks views on the government's proposals for how the MRN will achieve these policy objectives across 3 themes. These are:

- **defining the network**
- **investment planning**
- **eligibility and investment assessment criteria**

The proposals in this consultation outline how the MRN will:

- form a consistent, coherent network alongside the SRN that brings about the opportunity to better co-ordinate roads investment
- provide funding certainty to roads in the network, through use of the National Roads Fund, and raise standards and performance across the new network
- provide clear roles for local and regional partners, who will support the government to deliver and develop MRN schemes

Confidentiality

We thank all respondents for taking the time to read the consultation document and to respond to the consultation questions. Your views on the programme's core objectives and principles, as well as the major themes set out in the consultation, will contribute to the formulation of MRN policy.

2. Respondent details

Your contact details. We will only contact you if we need to clarify any of the answers you give us.

Your name

Your email

In what capacity are you responding?

- Central government, executive agency or non-departmental public body
- Local authority or combined authority
- Sub-national transport body, ADEPT or other regional partnership (public sector)
- Industry or business (private sector)
- MP / Councillor
- Member of the public
- Other (please specify):

In which region are you based?

- East Midlands
- London
- East of England
- North East
- North West
- South East
- South West
- West Midlands
- Yorkshire and the Humber

3. MRN core principles

Questions in this section relate to pages 20 to 21 of the consultation document, 'MRN Core Principles'.

In order to deliver our objectives for the MRN, we believe there are a number of fundamental principles that must be at the heart of our plans for a MRN and its programme of investment. These are:

- **increased certainty of funding**
- **a consistent network**
- **a coordinated investment programme**
- **a focus on enhancement and major renewals**
- **clear local, regional and national roles**
- **strengthening links with the Strategic Road Network**

Q1. Do you agree with the proposed core principles for the MRN outlined in the consultation document?

- Yes
- No
- Don't know

4. MRN core principles

If you answered no, which core principle(s) do you disagree with? Provide an explanation why.

East Sussex County Council (ESCC) supports the six proposed core principles and feels that these will be an effective way of delivering the objectives of the Major Road Network (MRN). We are slightly concerned, however, about the extent of the focus on enhancement and major renewals and the lack of clarity on implications for the funding and delivery of routine maintenance activities.

MRN status will lead to higher expectations of the standard of routes amongst the public and if sufficient revenue funding isn't provided by the MRN Investment Programme it will be necessary to adjust the existing funding arrangements for local authorities to recognise the greater responsibilities placed on them by the MRN. Traffic management, information provision and day-to-day maintenance will be as important as capital enhancements to delivering improved standards and performance on the network, and it's important that funding for routine maintenance is provided to meet these commitments if the full benefits of the MRN are to be realised.

5. Defining the network

Questions in this section relate to pages 22 to 27 of the consultation document, 'Defining the Network'.

The extent of the network must strike a balance between capturing the most economically important regional roads and ensuring that its size is appropriate, enabling investments that can drive an improvement to the level of funding available.

Any definition must make the best use of local and regional knowledge to ensure that the most economically important roads are captured. To strike this balance appropriately, we are proposing the use of both quantitative and qualitative criteria to define the network. This approach ensures:

- the network is coherent, i.e. more than just a set of fragmented sections of road
- the network has a sound, objective analytical basis, yet also has the flexibility to factor in local knowledge and requirements

Q2. To what extent do you agree or disagree with the quantitative criteria outlined in the consultation document and their proposed application?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

6. Defining the network - quantitative criteria

If you disagree or strongly disagree, what should be the quantitative criteria?

ESCC agrees with the use of the two-tier traffic flow criteria as the starting point for identifying the most economically important local authority roads, but would argue that some amendments are needed.

The thresholds applied in the consultation are applied individually with sharp cut off points, which produces a bias against roads that have fairly high scores against each of the criteria, e.g. a road with traffic flow only just below 20k Average Annual Daily Flow (AADF) and with HGV and LGV proportions only just below the 5% and 15% thresholds would not be included; whereas a road only just over the 10k AADF and just exceeding the 15% LGV threshold would qualify. This could result in roads which are economically valuable and/or provide resilience to the wider road network being excluded from the MRN. Applying the thresholds in a more graduated way would help resolve this issue. We propose a scoring system in which roads in the 10k to 20k AADF band qualify for inclusion only if they score more than the equivalent of meeting two of the three qualifying conditions¹

The use of AADF data from a single year has some vulnerability to individual counts being unrepresentative, e.g. due to equipment faults or peaks and troughs in traffic flow. Inconsistencies in this method could be reduced by using a five-year average of recently observed traffic flows.

We agree with the Department for Transport's (DfT) proposal not to forecast future traffic growth to determine inclusion in the MRN. However we feel that qualitative criteria should be used to take account of designated growth areas in the current plans, and not be reliant on inclusion in future reviews.

ESCC disagrees with the proposal in the consultation to include all de-trunked roads in the MRN, assuming that the reference to 'where appropriate' means that these roads meet some other criteria we can't see a justification in singling them out. Although many of these roads will still play an important regional role and would justify inclusion in the MRN on the basis of the criteria already established in the consultation, their blanket inclusion undermines the aims for a consistent national approach in the creation of the MRN and the pre-2000 trunk road network was biased towards the Midlands and the North. East Sussex had, and still has, a relatively small trunk road network compared to other counties across the South East and nationally, and there are roads in the county which we feel have a stronger claim for inclusion in the MRN than some detrunked sections in other parts of the country.

¹ Relevant links with traffic flows of between 10,000 and 20,000 to be identified for inclusion in the MRN using a score calculated as the average of:

- the extent to which AADF exceeds 10k $(AADF - 10,000) / (20,000 - 10,000)$;
- the extent to which the HGV percentage reaches the 5% level $(HGV \text{ percentage} / 5\%)$; and
- the extent to which the LGV percentage reaches the 15% level $(LGV \text{ percentage} / 15\%)$

Links scoring more than 0.67 (i.e. the equivalent of fully meeting two of the three criteria) to be included in the indicative MRN network, thereby allowing those links with moderate scores against each criterion to be included, as well as those with a high score against only one criterion.

7. Defining the network - qualitative criteria

Q3. To what extent do you agree or disagree with the qualitative criteria outlined in the consultation document and their application?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

8. Defining the network - qualitative criteria

If you disagree or strongly disagree, what should be the qualitative criteria?

ESCC believes that the qualitative criteria 'Linking Economic Centres' and 'Access to/Resilience for the SRN' could be improved by focusing on five nationally available datasets, as well as the population centres and gateways or transport hubs identified in the consultation. The five datasets are:

- Employment areas/hubs – represented by density of employment by Middle Layer Super Output Area.
- Opportunity Areas/Enterprise Zones – as identified in Highways England's Mapinsight mapping tool.
- Proximity to adjacent economic areas – represented by buffers around main urban centres to help identify centres in close proximity to one another.
- Diversion routes – to indicate routes identified as diversions for SRN roads and therefore provide network resilience.
- SRN performance – to provide an indication of the sections of the SRN closest to capacity and likely to be most susceptible to incidents and in need of resilience.

Taking these datasets into account we would propose three qualitative criteria which would complete the definition of the MRN nationally:

1. Completing economic connections: ensuring that all qualifying economic centres are connected to the SRN/MRN. We are happy with the criteria in the Rees Jeffreys report; centres with a population over 50,000, or in exceptional circumstances over 25,000. We would propose that this is complemented by Economic Opportunity Areas, including Hastings, and Enterprise Zones such as Newhaven, to ensure the MRN continues to facilitate growth over the coming years. Greater clarity and consistency is needed on the MRN definition for:
 - The level of activity at international gateways and other road freight hubs that justifies their access to the SRN/MRN (with all more important gateways having access to the SRN rather than the MRN). Newhaven Port in East Sussex carries international freight and work is ongoing with our partners to encourage more freight use of the port. The methodology should specify minimum tonnage or passenger volumes necessary for access to the SRN/MRN.
 - How far MRN roads should continue into town or city centres, and whether these should only form part of the route if they then continue as through routes, or whether spurs off the MRN should also be included. We believe that spurs off the main MRN are only justified if they serve major coastal towns; urban corridors should only be included in the MRN if they form through routes, and hence are able to support criteria 2 and/or 3 below. We have detailed, in response to question 13, how stretches of urban MRN require special treatment in recognition of the multiple roles they perform.
2. Resilience for the SRN: The SRN in East Sussex is consistently overloaded and its inconsistent nature means it is not fit for purpose for performing its function of carrying longer distance strategic traffic. There are a number of roads in the county – both A class and lower order roads – which run parallel to busy SRN roads, and because of the deficiencies of the SRN in the county, it results in traffic rerouting on these roads. Extra investment in capacity on the A class roads would provide greater support to the SRN where it is running at, or near, capacity. We believe the benefits these roads bring warrants inclusion in the MRN.

We would not propose including roads which run through sensitive urban or rural areas,

unless expansion of the corresponding stretch of SRN is even less suitable.

We would not envisage inclusion of the Agreed Diversion Routes for the SRN in the MRN unless there is a specific requirement in terms of connecting economic centres or growth areas. Improvements to these routes should continue to be funded from SRN funding.

3. Relief for the SRN: The MRN shouldn't just aim to provide access to the SRN, but should provide alternative routes to economic centres and growth areas independent of the SRN. The limited length and capacity of the SRN in East Sussex makes this more significant locally, providing an MRN network which connected economic centres without using the SRN would also reduce pressure on strategic roads.

We considered the case for a fourth qualitative criteria, a commitment not to designate any road in the MRN which runs through environmentally sensitive areas. Where there is a good case for an MRN road running through a protected/sensitive area investment could be directed, not at increasing the capacity of the road, but at improving the standard of local environmental mitigation and preventing rat-running on less suitable local roads that go further into the protected area; with these considerations inclusion of these roads in the MRN need not lead to additional traffic growth. As such we don't see the need to rule out MRN designation in these areas completely.

9. Defining the network

Q4. 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?

- Yes
- No
- Don't know

If no, explain how the criteria are failing to identify a section of road you feel should be included.

The suggested changes to the quantitative and qualitative criteria detailed earlier in our response would lead to a number of additional roads being added to the MRN. The new roads that we feel should be included meet one, or both, of two criteria; completing economic connections, and operating as parallel routes to a road in the SRN.

Road	Reason for inclusion
A259 Brighton to Newhaven and Seaford	Completing economic connections / Parallel route
A259 Seaford to Eastbourne	Completing economic connections / Parallel route
A22 Golden Jubilee Way/A2270/A2280/A2021 in Eastbourne	Completing economic connection from the strategic road network into economic growth location
A271/A269 Hailsham to Bexhill	Completing economic connections / Parallel route
Bexhill Hastings Link Road between A259 and A21 (A2690)	Completing economic connections / Parallel route

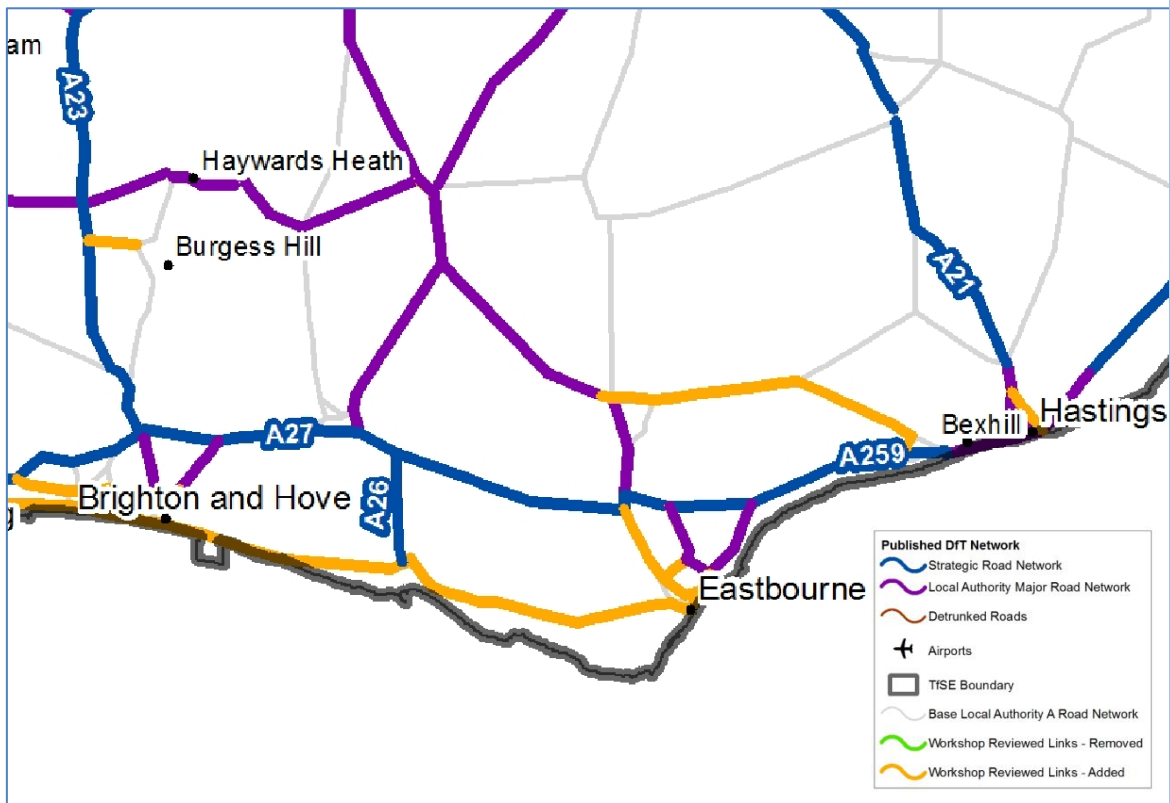
Completing economic connections: all of the routes identified above are in line with the Rees Jeffreys approach of ensuring key economic centres are connected to the network, but also these provide resilience to the overall network.

Parallel routes: The A259 Brighton to Seaford and the A259 Seaford to Eastbourne meet the Rees Jeffreys flow criteria for inclusion in the MRN as set out in the consultation, however they were removed as part of the rationalisation process as they were considered too close and parallel to existing SRN links.

A review undertaken using our additional suggested criteria shows there is a strong case for including all of the parallel routes as identified above as:

- They have large flow volumes and/or high freight proportions despite the parallel SEN route, suggesting that they serve their own economic function.
- They provide resilience for the busy sections of the SRN. This is particularly relevant for the A27/A259 which is sensitive to incidents as it is operating at near capacity, and beyond capacity at peak times, and for many stretches only has single lane provision.

The suggested MRN (including the SRN) for East Sussex is as shown on the plan below:



Q5. Have the quantitative or qualitative criteria proposed in the consultation document identified sections of road you feel should not be included in the MRN?

- Yes
- No
- Don't know

If they have, explain why these roads should not be included in the MRN.

10. Defining the network – refreshing the MRN

It will be important for the MRN to remain relevant and reflect the latest data and changes to economic centres and road use. However, this must be balanced against the need to provide a stable platform on which the MRN investment programme can be delivered.

We propose to review the MRN every 5 years to coincide with the existing Road Investment Strategy (RIS) timetable. This will involve updating and reviewing the data that are used and engagement with all bodies involved in the delivery of the MRN programme.

Q6. Do you agree with the proposal for how the MRN should be reviewed in future years?

- Yes
- No
- Don't know

If you answered no, how should the MRN be reviewed in future years?

11. Investment planning

Questions in this section relate to pages 28 to 31 of the consultation document, 'Investment Planning'.

The creation of the MRN should support long-term strategic consideration of investment needs in order to make best use of the targeted funding that will be made available from the National Roads Fund and deliver the best possible result for the user. The important national and regional role played by roads included in the MRN means that individual local authorities cannot plan investments in isolation, nor can decisions be completely centralised at either a regional or national level.

As set out in the core principles section of the consultation document we propose that, alongside the local role of highways authorities, there needs to be a strong regional focus for investment planning within a consistent national network. The consultation document sets out roles for:

- **local bodies (such as local authorities and local highways authorities)**
- **regional bodies (such as sub-national transport bodies)**
- **national bodies (such as the department)**

Q7. To what extent do you agree or disagree with the roles outlined in the consultation document for:

	Strongly agree	Agree	Neither agree not disagree	Disagree	Strongly disagree
Local bodies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Regional bodies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
National bodies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you have selected Disagree or Disagree Strongly for any of the proposed roles, what should the role involve? Specify which role you're referring to, ie local, regional or national.

Please see our response to question 8.

12. Additional roles and responsibilities

Q8. What additional responsibilities, if any, should be included? State at which level these roles should be allocated.

ESCC is generally content with the balance of responsibilities as set out in the consultation document. Greater clarity will be needed on the DfT's role in assessing and prioritising the Regional Evidence Bases (REB), this should not simply entail ranking one region's submission over another's.

We agree that Sub-national Transport Bodies (STBs) are the most appropriate organisations to take on the proposed strategic role for the MRN. STBs should have full responsibility for the development of the REB, with the DfT operating in an advisory role. There needs to be recognition from the DfT that the creation of the REB by the STB, and the preparatory work ESCC will have to do to contribute to this, should receive appropriate funding support.

The responsibility for updating the Programme and REB, which will be shared between the DfT and STBs, should be amended to align with the five-year Roads Investment funding cycle for the MRN and SRN, we propose an interim review is held in years two and four of each road period.

ESCC believes the STBs should have an input into long-term planning for the National Road Fund, and the distribution of funds between the SRN and the MRN. The most effective way to build up the best possible pipeline of schemes is if there is visibility of funding levels for the MRN running into the next five year planning period.

ESCC welcomes the proposed flexibility for regions to design and manage the process of submitting schemes for consideration by the DfT. The most effective way of managing investment proposals will be for multiple highways authorities, each with a stake in the proposals, to work through STBs. However once the scheme is approved, responsibility for delivery should sit with an individual local authority, although stakeholders would also have ownership and input into the project, with Local Enterprise Partnerships (LEPs) as an active partner in plans for the road, especially where the primary driver is to complete economic connections.

Q9. 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?

- Yes
- No
- Don't know

If you answered no, explain how the MRN should be managed in regions where no STBs exist.

13. Investment planning – regional evidence base

We propose that STBs or regional groups would be responsible for developing a regional evidence base which would be the basis for the development of the MRN investment programme. Where STBs exist we expect that the regional evidence base would be developed from the existing statutory transport strategies for which STBs are responsible.

The regional evidence base would be evidence-based and should not be limited to performing a mechanical sifting exercise. As a minimum, the department would expect them to comprise the following:

- an assessment of the overall condition of the existing network and its performance.
- the identification of network-wide issues and priority corridors.
- analysis of potential region-wide solutions and the development of specific interventions to tackle the issues identified over at least a 5 year period, although we expect and encourage STBs or regions to look beyond this in their strategic planning.
- an assessment of the potential sequencing of the schemes identified.

Q10. Are there any other factors, or evidence, that should be included within the scope of the regional evidence bases?

- Yes
- No
- Don't know

If you answered yes, describe the additional factors or evidence you feel should be within the scope of the regional evidence bases.

ESCC believes that an effective REB must include an assessment of both the SRN and MRN in combination. Investment proposals must take account of effects on both networks, not one in isolation. We recognise the benefits in making early progress with the MRN concept, and although this may lead to schemes being fast tracked before they are underpinned by the full REB, we believe in some instances this may be justified.

The REB should take account of the Strategic Economic Plans for the two LEPs in East Sussex; the South East Local Enterprise Partnership, and Coast to Capital. The prospectuses contained within the Strategic Economic Plans will have transport implications so should be considered in any full assessment of transport in the county.

14. Investment planning – the role of Highways England

A core principle of the MRN programme is to bring more coordinated planning to these important roads. Given Highways England's experience in road investment planning, and the need to ensure a seamless transition between the SRN and MRN, we propose that Highways England, the body responsible for running the SRN, should also have a role in the MRN Programme. This role could include:

- **programme support** - Highways England could have a role in the governance of the MRN investment programme advising the department on the development of the MRN pipeline and its interactions with the SRN, and providing wider support as needed.
- **analytical support** - Highways England could support the department in analysing the regional evidence bases in order to prepare advice to ministers on the MRN investment programme.
- **cost estimate support** - Highways England could support the department in assessing scheme cost estimates.
- **delivery support** - Highways England could support, if required, LAs in the delivery of agreed MRN schemes. This could include advising LAs on design and development as well as supporting access to the supply chain to enable LAs to take advantage of economies of scale that may be available.

Q11. Do you agree with the role that has been outlined in the consultation document for Highways England?

- Yes
- No
- Don't know

If you answered no, what should be the role of Highways England?

ESCC welcomes an active role for Highways England in the MRN programme, as long as they are provided with sufficient resources to fulfil this role. We believe the MRN priorities should take account of the plans laid out in the current and future RIS to ensure investments in the SRN and MRN complement one another. We believe the four responsibilities for Highways England set out in the Consultation provide a good balance, and their role should be limited to the activities mentioned.

15. Eligibility criteria

Questions in this section relate to pages 32 to 35 of the consultation document, 'Eligibility and investment assessment criteria'.

The department does not intend to replace existing funding streams such as formula funding for Highway Maintenance or Integrated Transport Block funding which may be directed to any LA roads including the MRN network. For that reason, we propose that funding to improve and enhance the MRN should be targeted towards significant interventions that will transform important stretches of the network.

We propose that only proposals for contributions of £20 million or over will be considered for MRN funding. As we want this fund to benefit all areas of the country and produce an improvement for users across the network we would expect that most funding requests would not exceed £50 million, where there is a strong case we would be willing to consider scheme proposals requiring higher contributions, up to a maximum of £100 million.

To get the best value for money, regions and local authority promoters should work to minimise scheme costs through scheme optimisation and the securing of third party contributions, alongside local contributions. We are proposing the following schemes would be eligible for MRN funding:

- **bypasses**
- **missing road links**
- **widening of existing MRN roads**
- **major structural renewals**
- **major junction improvements**
- **variable message signs**
- **traffic management and the use of smart technology and data**
- **packages of improvements**

Q12. Do you agree with the cost thresholds outlined in the consultation document?

- Yes**
- No**
- Don't know**

If you answered no, what should be the cost thresholds?

Q13. Do you agree with the eligibility criteria outlined in the consultation document?

- Yes
- No
- Don't know

If you answered no, what should the eligibility criteria be?

Types of scheme that will be eligible for funding:

Bypasses:

The Council supports the inclusion of bypasses in the eligibility criteria and recognises the significant benefits new bypasses can have on the performance of routes. Consideration should be given to the potential knock on effects of new bypasses to other communities, which may lie outside of the local authority in which the new road is being built, so the effect on the whole transport corridor, as well as the immediate community involved, needs to be considered.

Missing Links:

We support the inclusion of missing links in the MRN, although where any such links interface directly with the SRN, consideration needs to be given as to whether they should be funded by the MRN or SRN. Each case will be different, but it will be important to establish responsibility and ownership.

Widening of Existing MRN roads / Major Junction Improvements / Packages of Improvements:

Packages of improvements will play an important role in raising the standard of the MRN. A package of improvements to the proposed MRN roads in East Sussex could potentially help to improve performance, safety and the environmental impact of the roads. The widening of existing roads or major junction improvements is also potentially significant to a number of routes in the county. As described above, consideration will need to be given as to whether improvements to junctions which link the MRN to the SRN should be funded through the MRN or the SRN.

We believe the Highways England SRN Initial Report sets out a potential model for key MRN corridors with the phased upgrading of All-Purpose Trunk Roads to expressways, with a consistent treatment for longer stretches of roads which would improve overall performance. The rollout of the expressway model to the busiest sections of the SRN and MRN should be considered.

Major Structural Renewals:

Renewals will play a key part in improving the network, ensuring and improving continued accessibility to the MRN, which should have an economic benefit.

Variable Message Signs, Traffic Management and the Use of Smart Technology and Data:

These schemes should, as far as possible, fully integrate with existing and proposed Highways England systems and cover full subsets of the network and not just individual stretches of roads.

Exclusions:

ESCC does not agree with the second exclusion, that some schemes on the SRN 'of a distinct local sub-national nature' may qualify for MRN funding. All funding for SRN schemes should come from the RIS and not from funding allocated for the MRN.

The exclusions preclude public transport enhancements, except in some circumstances. We would argue the exception stipulated in the exclusion should enable substantial bus and coach travel enhancements to take place. Increased use of buses and coaches could significantly reduce congestion, which is an objective of the MRN programme.

We believe that in urban areas public transport, and other alternatives to private cars, should form a central component of the distinct approach to the needs of the MRN. The Rees Jeffreys

report proposed special treatment of 'Tier 3' roads within the MRN, recognising these roads serve the needs of 'place' as much as 'movement', and how the management of such roads must sit within the wider transportation policies for the urban area. Bus priority schemes and schemes that enhance the local streetscape should be prominent features of corridor improvements on urban MRN roads.

16. Investment assessment criteria

To support the development of regional evidence bases and a national investment programme we are proposing that a clear set of criteria be developed. These support the government's overarching objectives for the MRN programme whilst providing local and regional bodies the flexibility to develop proposals that support the delivery of local and regional objectives.

We propose that these criteria should be as follows:

Objective	Criteria
Reduce Congestion	<ul style="list-style-type: none">○ Alleviate Congestion○ Environmental Impacts:<ul style="list-style-type: none">○ Improve air quality and biodiversity○ Reduce noise and risk of flooding○ Protect water quality, landscape and cultural heritage sites
Support Economic Growth & Rebalancing	<ul style="list-style-type: none">○ Industrial Strategy: Supports regional strategic goals to boost economic growth○ Economic Impact: Improve ability to access new or existing employment sites○ Trade & Gateways Impact: Improve international connectivity, e.g. access to ports & airports
Support Housing Delivery	<ul style="list-style-type: none">○ Support the creation of new housing developments by improving access to future development sites and boosting suitable land capacity
Supporting All Road Users	<ul style="list-style-type: none">○ Deliver benefits for non-motorised users, including cyclists, pedestrians and disabled people○ Safety Benefits: Reduce the risk of deaths/serious injuries for all users of the MRN
Support the SRN	<ul style="list-style-type: none">○ Improve end to end journey times across both networks.○ Improve journey time reliability○ Improve SRN resilience

Q14. Do you agree with the investment assessment criteria outlined in the consultation document?

- Yes
- No
- Don't know

If you answered no, what should the investment assessment criteria be?

We believe that more prominence should be given to Safety Benefits, within the 'Support All Road Users' section. This should be followed by a focus on journey quality for users, which would apply the assessments of end-to-end journey times, reliability, and resilience, which are currently included in the 'Support the SRN' section.

Q15. In addition to the eligibility and assessment criteria described what, if any, additional criteria should be included in the proposal? Please be as detailed as possible.

Environmental Impacts, which are currently included in the 'Reduce Congestion' section, justifies being an objective in its own right. This would result in a greater buy in from all interested parties and as a standalone objective could be expanded to also assess landscape and design aspects of MRN investment proposals.

17. Other considerations

Q16. Is there anything further you would like added to the MRN proposal?

The Council believes there should be greater emphasis given to improving the performance of roads in the MRN, which currently only receives passing comment in the consultation, as this will be key to ensuring the network supports the economy. We believe a hierarchy of responsibility which is comparable to that which manages the SRN, with a detailed performance specification which is carefully monitored by the Office of Rail and Road, should be introduced. Balanced funding, for both revenue and capital, being assigned to local authorities will be key to ensuring that improvements are seen across the MRN, and that the raised expectations which accompany the new network are met.

Although the standard of road on the MRN will vary greatly it will be important to ensure that all roads meet a minimum standard. Particular focus should be given to HGV traffic and structures, ensuring that height and weight restrictions don't limit access to any sections of the MRN for certain classes of vehicles.

The proposals would benefit from further clarification as to whether the MRN, once designated, will be classed alongside the SRN, so that larger developments on the MRN automatically come within the scope of the planning requirements for nationally significant infrastructure projects.

