



## **Response of the Road Haulage Association to Department for Transport.**

### **“ Proposals for the Creation of a Major Road Network Consultation”.**

**19<sup>th</sup> March 2018**

#### **Summary of Consultation**

1. As part of the Transport Investment Strategy, the government is consulting on the creation of a Major Road Network (MRN) to support the Strategic Road Network (SRN).
2. The consultation asks for views on; how to define the MRN, the role that local, regional and national bodies will play in the MRN investment programme and which schemes will be eligible for MRN funding.

#### **Background about the RHA**

3. The RHA is the leading trade association representing road haulage and distribution companies, which operate HGVs as profit centres. Our 7,000 members, operating near to 100,000 HGVs, range from single-truck firms to those with thousands of vehicles. These companies provide essential services on which the people and businesses of the UK depend.
4. We proactively encourage a spirit of entrepreneurship, compliance, profitability, safety and social responsibility. We do so through a range of advice, representation and services, including training.
5. We would like to thank the Department for Transport for the consultation and the opportunity to comment on the issues raised.

#### **Responses to the Questions**

**Question 1. Core Principles - Do you agree with the proposed core principles for the MRN outlined in this document?**

6. The RHA agrees with and supports the following core principles: increased certainty of funding, a consistent network, a coordinated investment programme, a focus on enhancement and major renewals and strengthening links with the Strategic Road Network.
7. But, we have concerns about how the local, regional and national roles will coordinate and apply their operations to ensure a fully integrated system that will function seamlessly. There may be too many individual entities involved for this to happen.
8. A consistent and resilient network are the key priorities, attached to this is a need for free flowing traffic without congestion. The MRN will be core for road freight, 100% of food is moved by road and 90% of other commodities consumed in the UK is transported by land in this way. A fully functioning MRN which strongly supports the SRN in all places is essential for economic growth, consistent journey times are required, this must be delivered, not just aspirational.

## **Defining the MRN**

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

9. We agree with the quantitative criteria of; 1) Roads where traffic flow is greater than a defined level and 2) Roads where traffic flow is greater than a defined level (but lower than in criteria 1), where, the proportion of HGV/ LCV's on that section of road is also greater than a defined level.
10. The first criterion factors in particularly heavily, and we welcome recognition of the economic importance of the transportation of freight. Whilst traffic flow data can be used to identify roads suitable for the MRN, we consider that congestion data needs higher priority, since congestion and unreliable journey time add significant cost. Congestion is the root cause of poor air quality.

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

11. The RHA supports the qualitative criteria, especially the recognition that fragmented road links are not efficient. The MRN must be consistent and coherent across the country when considered alongside the SRN.
12. We need to ensure that major conurbations, airports, ports and other significant economic centres are connected via the MRN.
13. We support connecting all major ports, airports and key transport hubs, including railheads, not already linked by the SRN.

**Question 4. Have both the quantitative and qualitative criteria proposed in the consultation document identified all sections of road you feel should be included in the MRN?**

14. Generally, yes. RHA members have been asked for their views on roads that should be included in the Strategic and Major Road Networks. The majority of the roads suggested are now included on the proposed Major Road Network map published by the Department for Transport at <http://maps.dft.gov.uk/major-road-network-consultation/>
15. Roads not shown, but we suggest are also included are; A350 Warminster to Poole, A46 Lincoln to Cleethorpes, and A35 Poole to Southampton.

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

16. No

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

17. The indicated five year review time, when linked to the RIS timeline, seems sensible.

## Investment Planning

**Question 7. To what extent do you agree or disagree with the roles outlined for local, regional and national bodies?**

18. We consider that there needs to be a consistent approach. Whilst local bodies need to be involved to identify problems, there needs to be a national standard that can be applied and monitored as to how modifications are implemented. A regulatory aspect needs to be included to ensure national standards are adhered to, for example ensuring all bridges are capable of being used by 44 tonne vehicles.

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

19. Adequate provision must be made for unforeseen circumstances, including maintenance and repair.

**Question 9. 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?**

20. This would appear to be the most sensible way forward.

**Question 10. Are there any other factors, or evidence, that should be included within the scope of the Regional Evidence Bases?**

21. No.

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

22. Yes, however the performance delivery of RIS1 has not been a total success, the reasons for this need to be identified and remedied.

## **Eligibility & Investment Assessment**

**Question 12. Do you agree with the cost thresholds outlined?**

23. The RHA considers that there should be no lower and upper financial thresholds, or limits. This could lead to schemes not progressing if they do not meet, or exceed thresholds and limits, such schemes may provide considerable benefits in their own right and should not be systematically excluded.

**Question 13. Do you agree with the eligibility criteria outlined?**

24. The RHA supports the criteria listed. Missing links need to be removed. The inclusion of pinch points, structural renewal, junction improvements especially those adjacent to the SRN are key areas for funding under the MRN.

25. Whilst Variable Message Signs and technology have their place, technology alone must not be relied on to improve traffic flow. Highways England's SRN Initial Report mentions MRN corridors, with All Purpose Trunk Roads, being upgraded to Expressways, to increase overall performance of the network and provide resilience to the SRN.

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

26. Yes.

**Question 15. 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.**

27. Road surface condition is not listed and should be included. Pot holes can rapidly increase in size over a short time period and cause congestion when drivers take action to avoid them. Also, road surface material plays an important role in reducing

noise and surface spray – this is a road safety matter and accidents impact on journey time reliability

## Other Considerations

### **Question 16. Is there anything further you would like added to the MRN proposals?**

28. Road freight has been mentioned and its importance recognised, however no mention is made of HGV parking facilities, or purpose built rest areas which are urgently needed for lorry drivers to take rest and mandatory daily and weekly rest. There is currently a deficit of some 9000 lorry parking spaces on a daily basis. Lay by facilities must also be incorporated on the MRN for drivers to take mandatory 45 minute breaks following 4.5 hours driving.
29. In previous questions we have referred to the performance of the MRN, we have alluded to free flowing, congestion free traffic with consistent journey times. The consultation document makes reference to performance, but goes no further. We consider that there need to be Key Performance Indicators to assess, improve and maintain standards that influence economic growth in the freight industry, including the delay cost to users of the SRN and MRN during roadworks and infrastructure improvements. We consider that higher construction cost would be acceptable, if improved road user journey times could be achieved through faster roadworks.
30. Excessively long construction and roadworks distances create massive congestion. Shorter sections of roadworks may improve journey times and reduce journey delays.
31. We question why there appears a reluctance for planners to use flyovers and use junctions instead, which effectively stops traffic free flow and creates poor air quality.

19<sup>th</sup> March 2018

Tom Cotton

Head of Licensing and Infrastructure Policy

Road Haulage Association

[t.cotton@rha.uk.net](mailto:t.cotton@rha.uk.net)