

**Department for Transport Consultation: Proposals for the creation of a Major Road Network**  
**KCC Questionnaire Response**

**MRN Core Principles**

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

Yes

**No**

Don't know

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

Core Principle 1 - Increased Certainty of Funding

If the Major Road Network (MRN) is to be successful in achieving its objectives, it is vital that there is the greatest level of funding certainty, especially ensuring that funding is long-term and fixed, regardless of changes in government. Kent County Council (KCC) expects funding arrangements for the MRN to be comparable to the Road Investment Strategy (RIS) process for the Strategic Road Network (SRN) so that schemes are set out at the start of the investment period and funding is guaranteed upfront.

However, whilst KCC agrees with the need for increased certainty of funding for improvements to the most important Local Authority roads (i.e. the MRN), it is imperative that maintenance funding is also included. Substantial maintenance can improve the flow of traffic and the resilience of a route, for example, by avoiding the need for patch-repairs or return visits by resurfacing a larger extent of carriageway. KCC understands that this type of maintenance is excluded from the scope of the MRN funding; however, as the highway network is our most valuable asset and Local Authorities across England are experiencing a maintenance backlog, certainty of maintenance funding is vital<sup>1</sup>. For comparison, Highways England (HE) have been able to resurface most of the M20 as part of Road Investment Strategy 1 (RIS1).

Core Principle 2 – A Consistent Network

The DfT's consultation document proposes to create a MRN of approximately the same mileage as the SRN, for which HE is responsible. Whilst the benefits of keeping the network a reasonable size are recognised, especially regarding the distribution/dilution of funding, KCC asks that this arbitrary limit should not force the exclusion of regionally important roads. For example, given Kent's geographical

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<sup>1</sup> The highway network is KCC's most valuable asset at around £25 billion but the maintenance backlog on KCC's roads is estimated to be around £630m. This could rise to around £1 billion in the next 10 years if the current level of investment is maintained, which really highlights the straggling position of England's Local Highway Authorities.

importance as the strategic international gateway to Europe, there are a greater number of roads which deserve MRN status than there is length of SRN in the county. KCC would not want these to be rejected based upon proposed mileage levels for the entire MRN network already being met.

#### Core Principle 4 – Clear Local, Regional & National Roles

Although the process for applying for MRN funding has not been fully set-out in the consultation document, it does state that the delivery body would be the Local Highway Authority and the Regional Evidence Base would be developed by the area's Sub-national Transport Body, i.e. Transport for the South East (TfSE), and ultimately funding approval will sit with Government. Based on bidding for other funding sources (e.g. Local Growth Fund, National Productivity Investment Fund) a fully worked-up business case will be required to access funding. To develop business cases and design schemes requires revenue funding as otherwise it may lead to abortive capital costs. However, KCC's revenue budgets have been reduced so much in recent years that it is challenging to produce a pipeline of schemes. KCC therefore asks that that some of the MRN funding should be allocated as revenue for scheme development.

#### Core Principle 5 – A Focus on Enhancement & Major Renewals

KCC agrees that Local Highway Authorities should remain responsible for MRN roads, but is concerned by the lack of any proposals for additional funding available for day-to-day maintenance of these roads. Whilst it is envisaged that existing funding arrangements for day-to-day maintenance will still be available, these budgets are already considerably stretched. Further, additional maintenance funding would help achieve a high-quality network, which is one of the aims of the MRN.

The rate at which local roads in England are deteriorating far exceeds the rate of investment from Government, and this is a constant theme of published reports. A Local Government Association report from 2017 estimated that the road maintenance backlog in England and Wales is around £12bn. If left unaddressed, the problem of local road maintenance will cause a failure in Local Highway Authorities' ability to maintain a safe network and this will cause delay and economic costs on strategic and regionally important routes.

#### Core Principle 6 – Strengthening Links with the Strategic Road Network

KCC agrees that strengthening links with the SRN will help to achieve an overall resilient network. There are several strategic links within Kent, such as the A249 (Detling Hill) connecting the M20 at J7 with the M2 at J5 and A229 (Bluebell Hill) connecting the M20 at J6 with the M2 at J3. These roads form a vital part of the network for both local and strategic traffic, carry large volumes of both cars and HGVs and suffer from increasing demand due to planned growth. Average Annual Daily Flows (AADF) (2016) on these links between the two motorways are over 68,000 vehicles on the A229, 4% of which are HGVs, and over 45,000 on the A249. As they are managed and maintained by KCC, there is limited funding available to deliver necessary improvements so their inclusion within the MRN is supported (especially as it is often their connecting junctions with the SRN where the majority of

congestion problems arise). However, KCC's response to the consultation on the *Shaping the Future of England's Strategic Roads* asked that the three most strategically significant links on KCC's network (the A229 Bluebell Hill and A249 Detling Hill, in addition to the A299 Thanet Way which carries an average of 46,000 vehicles a day) are formally trunked and added to the SRN. This request supersedes their inclusion on the MRN.

KCC also recommends that the core principles need to provide greater emphasis on how the MRN could improve road safety and enhance the environment. These are key objectives of KCC's *Local Transport Plan 4: Delivering Growth without Gridlock (2016-31)*. Further, as road safety is a key tenet of Highways England's work we would expect it to be a principle of the MRN.

## **Defining the Network**

**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

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

It is difficult to comment fully on the quantitative criteria when no threshold has been defined within the consultation document. We do not consider that the use of an arbitrary level of traffic should define the MRN, but we do agree that it can be a useful guide, particularly in terms of the proportion of HGV and Light Goods Vehicle (LGV) traffic as an indicator of the economic value of a route. There is also the need to be flexible where local knowledge may argue the inclusion of a road which does not meet the threshold set by AADF.

In addition, KCC is concerned by the lack of consideration given to future traffic flows resulting from the large scale of housing and employment growth expected in the county. KCC recommends that traffic modelling forecasts should also be considered as part of the quantitative criteria where flows may increase substantially prior to the next MRN review period. Whilst the current criteria to identify roads which already carry a large volume of traffic, there are a number of large scale Nationally Significant Infrastructure Projects (NSIP) within Kent (including the Lower Thames Crossing and London Resort) that are anticipated to generate a considerable number of additional journeys on both the SRN and MRN. Their impact should be considered within the initial assessment of potential roads so that improvements that provide resilience and improved traffic flows can be made in advance of their opening.

Further, utilising a single threshold for AADF data alone may fail to identify roads that experience a considerable increase in usage during times of disruption to the SRN. For instance, AADF data fails to identify the peaks and troughs of flows on roads within Kent when the Dover Traffic Assessment Project (Dover TAP) and Operation

Stack are in place. With use of the M20 restricted there is a corresponding increase in traffic on the Local Road Network, especially the A20.

Finally, KCC recommends that de-trunked roads should not automatically be included within the MRN. Some of the de-trunked roads in Kent (specifically the A259 and A292) no longer carry the volume of traffic, offer complete links, or provide the regional connectivity required for them to be included within the MRN. This is likely to be true elsewhere in the country where roads were de-trunked because a new road was built (here the A2070 replaced the A259 as the trunk road).

### **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

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

KCC generally agrees with the qualitative criteria – including providing links to economic centres, and ensuring major transport conurbations, airports, and ports are connected. Recognition should also be given to links between vital community amenities such as hospitals.

#### **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.**

Sections of road that KCC strongly asks should be included are listed below, with the MRN policy objective(s) they meet underlined.

- Extension of the A25 to M26 Junction 2a at Wrotham Heath - this continues the already identified section of the A25 in Surrey, supporting the SRN (M25 and M26) and providing access to the M20 both London bound and coastbound. The lack of east-facing slips at M25 Junction 5 means this is the main route from the M20 to the A21.
- A20 from Wrotham Heath through to Folkestone – only the Hollingbourne and Ashford central sections have been identified as potential MRN on the DfT

indicative map. This route runs parallel to the M20 and is routinely affected when there are issues on the M20. As a result of Brexit there will likely be significant delays on the M20 if it is used to queue port-bound freight vehicles due to increased border and customs checks, therefore the A20 will once again take on more of a strategic role and become a major route across the county between London and the coast. This will affect all the communities along its route and require major upgrades to cope with this new demand. The A20 therefore needs to be included as MRN to support to the SRN and provide resilience. Improvements on this route may also reduce congestion when there is disruption.

- The A2042, Chart Road and Templer Way in Ashford are used as the diversionary route for Operation Stack to connect the A20 from M20 J9 to M20 J10 via the A2070 (existing SRN). This continues the route of the A20 section and therefore supports the SRN.
- A256 from Dover docks to the A2 at Whitfield – this provides connectivity between the A2 and the A20, and is vital when the Dover Traffic Assessment Project (Dover TAP) is in use on the A20 (a complementary Dover TAP on the A2 is also needed). This supports the SRN.
- A28 linking Ashford, Canterbury and Margate – this provides cross-regional connectivity and links the three major urban areas of Thanet, Canterbury and Ashford. It then completes the link via the A2070/A259 to Hastings. It therefore supports economic growth and rebalancing and improvements will reduce congestion.
- Extension of the A299 to complete indicative network's connection to Ramsgate Port and support economic growth and rebalancing.
- A2 from Brenley Corner to Rainham (Medway) – this is a heavily used route between Sittingbourne and the Medway area. This is a key area for future growth and the A2 suffers serious congestion particularly if there is a problem on the M2. It therefore supports economic growth and rebalancing, supports housing delivery, and will reduce congestion.
- Extension of A206 to Greenhithe and B255 to A2 as this is heavily used during disruption at the Dartford Crossing. Improvements will therefore reduce congestion, and given the capacity of the Thames Gateway Kent area for growth it will also support housing delivery.
- Extension of the A229 from M20 Junction 6 through to its junction with the A21. This is an important north-south route in the area and rural service centres on the route are earmarked for growth. Improvements will support housing delivery and reduce congestion.

Figure 1, below, shows the sections of the indicative MRN that KCC requests should be retained, plus the suggested additions above.

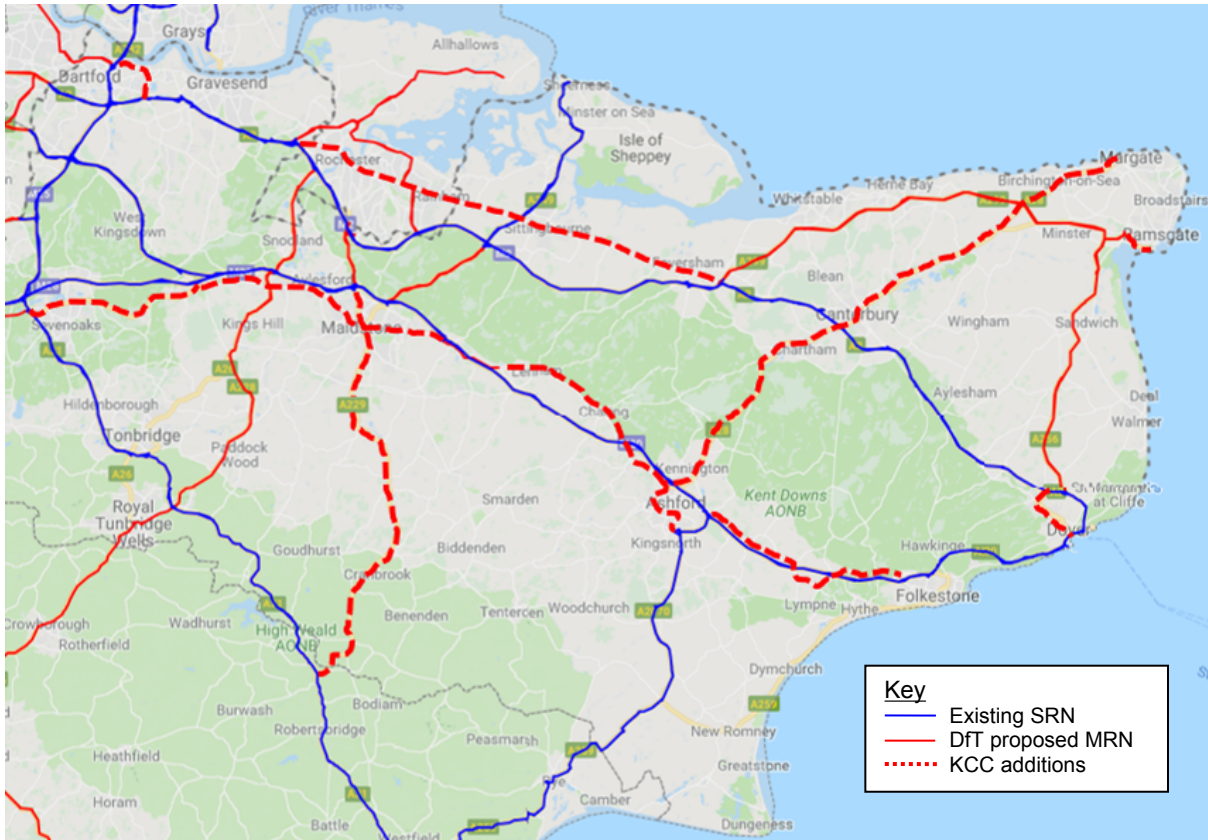


Figure 2: KCC Proposed Major Road Network

**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.**

A259 – This previously de-trunked road should be removed as it is now a local route with some high seasonal flows due to holiday traffic. The A2070 has replaced it on the SRN.

A292 – This previously de-trunked road should be removed, although an alternative diversionary route for Operation Stack has been proposed for inclusion through Ashford (see question 4).

**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.

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

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Local bodies	x				
Regional bodies		x			
National bodies		x			

**If you have selected disagree or disagree strongly for any of the proposed roles, what should the role involve? Specify which role you are referring to, i.e. local, regional or national.**

KCC strongly agrees with the roles outlined for local bodies, including the retained responsibility for MRN roads by Local Highway Authorities. However, the process of developing schemes and preparing Strategic Outline Business Cases is revenue intensive for Local Authorities – both design work and in employing additional resources. Additionally, regional bodies will need revenue funding to produce and update the Regional Evidence Base, as well as requiring additional staff to manage the governance, monitoring and partnership working. As regional bodies are funded by local bodies this has double the impact.

Without funding, the updates could become weaker and the MRN Programme may fail to achieve its objectives. KCC recommends that the model should be similar to Highways England’ RIS programme, which includes development funding in their overall funding package to truly put the MRN on an even footing with the SRN.

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

The role of the gatekeeper for funds has not been outlined within the proposals. Currently it has not been defined whether Local Authorities or Sub-national Transport Bodies (STB) are anticipated to manage allocated funds for schemes. This would depend on whether there are to be upfront funded regional programmes (in which case KCC would expect the STB to hold the funding) or if it is that schemes are directly awarded funding from Government (in which case KCC would expect funding to be passed to delivery bodies). Flexibility of funding across a programme would also be a welcome addition so that underspend on one scheme might be able to offset an unexpected cost increase in another.

Furthermore, clarification is required on who will be responsible for submitting bids for the MRN, whether Local Authorities are eligible to bid for funding or if proposals have to be developed and submitted by regional bodies such as STBs.

**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.**

KCC is currently a member authority of Transport for the South East, and therefore this question is more appropriate for comment from authorities without a Sub-national Transport Body affiliation.

**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.**

KCC agrees with the proposed scope of the regional evidence bases but also suggests the inclusion of forecast flows resulting from forthcoming developments. This is because new developments could have a substantial impact on the distribution and volume of traffic which would then require improvements to the MRN.

Furthermore, if the Regional Evidence Bases are expected to include an assessment of the overall condition of the existing network and its performance, maintenance condition should also be included in this assessment.

**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?**

KCC agrees that Highways England could have a role in setting the guidance and ensuring continuity of approach. However, the overall responsibility for the MRN and schemes on it should sit with Local Highway Authorities. Schemes that interface with the SRN (whether directly at a junction or on a diversionary route) will need to be planned with Highways England to avoid any disruption to the networks, and so



there is a clear role in programme coordination. Whatever their role, it needs to be better defined and to be of benefit to both Highways England and Local Authorities. DfT must ensure that Highways England have the capacity to provide an appropriate level of support to both STBs and Local Authorities, without introducing unnecessary bureaucracy to the Programme.

**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?**

Whilst KCC understands the logic that there are a range of other possible funding sources under the £20m threshold, these are not always suitable opportunities for the types of schemes that may be appropriate to improve the MRN. For example, many funds are tied to housing and job creation, but it may be that a small-scale junction improvement scheme (say around £5m for a roundabout) could substantially improve the performance of the MRN but is not directly related to housing/job growth. Further, it may not always be possible to package up improvements on a link to achieve these schemes under the MRN funding. Importantly, if Local Authorities are to utilise technology to make more intelligent use of the network it would be unlikely to cost £20m (even if packaged up) so opportunities will be missed to be 'smart'.

Likewise, general road maintenance can reduce delays and closures due to roadworks, but this is not available under the current proposals, and would also be likely to be under the £20m threshold. Again, KCC urges the DfT to reconsider the exclusion of funding for maintenance.

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

Yes

**No**

Don't know

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

Whilst we agree with the majority of the eligibility criteria, we feel public transport enhancements should not be excluded from the ability to bid for funding. Large scale public transport scheme such as Bus Rapid Transit projects could be beneficial to achieving MRN objectives by encouraging a modal shift away from the private car, reducing congestion and improving air quality.

KCC accepts the request for local contributions to schemes to give the best value for money but Government must appreciate that the ability of Local Highway Authorities to even meet revenue costs to develop a pipeline of schemes is extremely limited.

Further, as per the response to Q12, some schemes will not have access to developer contributions due to being remote from new housing or where such development has significant financial commitments already. So, for these reasons, KCC asks that funding is not dependent on local contributions where there is a material benefit to the MRN.

**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 criteria be?**

Value for money assessments will likely form part of the assessment criteria to ensure each scheme delivers a satisfactory benefit cost ratio. However, this should look at the whole scheme and not just the return on the investment portion from the National Roads Fund to ensure that good schemes with only small local contributions are not disadvantaged. MRN schemes should not be dependent on match-funding and local contributions because these are not always available. If the MRN Programme is to be comparable to the Highways England RIS Programme, then they should be funded in the same way.

It should be made clear whether a scheme needs to demonstrate how it meets all assessment criteria or whether the criteria is intended to be weighted e.g. schemes with greater safety benefits would be prioritised.

**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.**

There is no assessment around carbon or climate change impacts. Given the UK's commitment to reduce carbon emissions it would be appropriate to consider the way a scheme intends to reduce its carbon footprint through use of materials and lifecycle analysis. This should also include climate change resilience.

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

KCC would like to see flexibility on the roads included in the MRN recognising the level of local knowledge about how the network functions day-to-day. Figures for flows taken from one day, or an average figure, do not always represent the situation on the ground.