

Department for Transport Consultation on Proposals for the Creation of a Major Road Network: Devon County Council Response

Report of the Head of Planning, Transportation and Environment

Please note that the following recommendations are subject to consideration and determination by the Cabinet (and confirmation under the provisions of the Council's Constitution) before taking effect.

Recommendations: That

- (a) Cabinet agrees to continue to investigate and develop Devon County Council's involvement and role in the proposed Sub-National Transport Body for the South West Peninsula;**
- (b) Cabinet approves the draft Devon County Council consultation response (Appendix I) to the Department for Transport proposals for the creation of a Major Road Network; and gives delegated powers to the Head of Planning, Transportation and Environment, in consultation with the Cabinet Member for Infrastructure, Development and Waste, to make minor amendments to the draft response in conjunction with neighbouring authorities before submitting it to the Department for Transport.**

1. Summary

This report summarises the proposed consultation response to the Department for Transport's proposals for the creation of a Major Road Network. It also outlines the desirability for the formation of a South West Peninsula Sub-National Transport Body (STB).

2. Background/Introduction

As part of the Transport Investment Strategy, published in 2017, the Government committed to creating a Major Road Network (MRN) across England. The need for a MRN was identified in the Rees Jeffreys Road Fund Report, highlighting that there are a set of economically important roads that deserve a similar level of attention to the Strategic Road Network (SRN) (in Devon the SRN is the M5, A30, A38 and A35). The report indicates that these roads need to cater for an even broader mix of users than the SRN and that many of these regionally important roads cross numerous LA boundaries, resulting in potentially inconsistent management. However, these roads need more consistent and coordinated management than the rest of the local road network. As part of the local road network, these roads do not receive the benefits of long-term funding certainty and efficiencies provided by the Road Investment Strategy (RIS), which is wholly focused on the SRN. There would be benefits in considering an investment planning pipeline across this new network of MRN Local Authority 'A' roads, and this would help close the funding gap between the two sets of roads.

A 12-week consultation period is being held on the proposals for the MRN network between 23 December 2017 and 19 March 2018. This consultation outlines the Government's proposals and seeks views on its core principles, the definition of the network, investment planning, and eligibility and investment assessment.

The consultation sets out that the MRN will:

- Form a consistent, coherent network, alongside the SRN, to allow better coordination of road investment.
- Provide funding certainty to roads in the network through use of the National Roads Fund (funded by Vehicle Excise Duty), and raise standards and performance across the new network.
- Provide clear roles for local and regional partners, who will support the Government to develop and deliver MRN schemes.

The document also sets out a preference for Sub-National Transport Bodies (STBs) to be formed. These will have an important role in the MRN investment planning, as the national and regional role played by roads in the MRN means that individual Local Authorities should not plan investments in isolation.

Defining the network

The Government is proposing to shape the MRN using both an objective analytical basis and local knowledge and requirements. It is proposed that:

- Current traffic data is used as the starting point to identify those roads that should be considered for inclusion in the MRN: 'A' roads with greater than 20,000 vehicles per day or roads with as few as 10,000 vehicles per day provided that at least 5% are heavy goods vehicles.
- To use qualitative criteria in order to create a coherent and consistent network.
- To take into account evidence from local and regional partners concerning regional variations.
- To include, where appropriate, previously de-trunked roads.
- To review the MRN every five years in line with the existing Road Investment Strategy cycle.

The consultation document provides an indicative map of the MRN within Devon using the proposed methodology, provided in *Figure 1*. This is a key element of the consultation as discussed later.



Figure 1: Proposed Devon MRN

Investment Planning

The Government proposes roles for local, regional and national bodies to support the long-term strategic thinking about the investment needs of the MRN. Ministers will be the ultimate decision makers, but local and regional bodies will be expected to work together to develop and prioritise packages of interventions for consideration. It is proposed that:

- Local authorities and Sub-National Transport Bodies (STBs), or regional groups will develop Regional Evidence Bases that will include an assessment of the network and identification of priority corridors.
- Regional Evidence Bases will inform the development of the MRN Investment Programme.
- The Investment Programme will be reported on periodically, with both the Investment Programme and Regional Evidence Bases updated every two years.
- There will be a role for Highways England to support local, regional and national bodies involved in the MRN Programme.

Eligibility and Investment Assessment Criteria

The MRN funding should target significant interventions which offer transformative solutions to the most economically important local authority 'A' roads, as well as providing value for money for the taxpayer. These solutions will include, but are not limited to, bypasses, major renewal work, major junction improvements, use of technology and the widening of existing MRN roads. The consultation seeks views on the following proposals:

- MRN schemes will only be considered if they seek funding in excess of £20 million, up to a maximum ceiling of £100 million, and are supported by a local contribution.
- The investment assessment criteria used to assess MRN schemes will be based on the MRN objectives:
 - Reduce congestion
 - Support economic growth and regional rebalancing
 - Support housing delivery

- Support all road users
- Support the SRN.

3. Proposal

A proposed consultation response from Devon County Council is attached as Appendix I. The main points are summarised in this report.

Defining the MRN

The proposals include both quantitative and qualitative criteria for identifying links that should be included in the MRN. However, there remain some links that would benefit from inclusion in the MRN which are currently omitted under the criteria:

- The **A386** (a vital north-south corridor connecting several market towns)
 - Split into two sections; the A386 between Plymouth and Sourton Cross (this is approaching the defined criteria in terms of flows and is supported by Plymouth City Council) and the A386 between Sourton Cross and Bideford (this enables rural connectivity between North Devon and Plymouth)
- The **A376** (an important commuter corridor along the Exe Estuary)
- The **A382** (enables significant housing and employment delivery)
- **Sherford Road** between Elburton Road and Deep Lane junction (enables a continuous MRN/SRN network given Plymouth City Council's aspirations to promote the A379 between Laira Bridge and Haye Road for inclusion in the MRN)
- The **A39** between Minehead and Barnstaple (enables a continuous MRN/SRN network given Somerset County Council's aspirations to promote the A39 between Bridgwater and Minehead)
- The **A388** (enables a continuous MRN/SRN network given Cornwall Council's aspirations to promote the A388 between Saltash and Launceston)

The proposed amendments to the MRN network are shown in *Figure 2* below.

Investment Planning

There are roles proposed for local, regional and national bodies. These need to be defined clearly to avoid confusion. Clearly, the MRN sits within all three levels of management, with many of the roads crossing borders between authorities. By working together on investment planning for the MRN in regions, areas can develop a long-term strategic approach to the improvement and enhancement of the MRN. Having a “regional” MRN network will help avoid the cliff edge between funding of the SRN roads and the stretched funding of the Local Highway Authority road network. The difficulty will come in defining the region and regional network. The involvement of six Local Authorities with slightly different priorities means setting a long term, but flexible, programme which will involve a more complex approval process. This will then be scrutinised by the Department for Transport and there will be competition between the different regions for funding. Setting up a regional system is going to require good, efficient, equitable governance and a slick system of appraisal and long-term funding allocations which are transparent.

It is considered the most efficient way to manage this process will be through the formation of a Sub-National Transport Body (STBs) for the South West Peninsula. Currently, decision-making over strategic transport schemes is centralised at the national level. However, the government recognises that greater local input is needed to drive transformational growth and rebalance the economy. STBs are bodies designed to enable regions to speak with one voice on strategic transport planning. STBs have been developed across the country, such as Transport for the North and Midlands Connect, and the south west risks losing out if they cannot keep pace with the rest of the country by forming a STB to carry out the important strategic role needed for the MRN.

To maximise the role of local authorities in the MRN decision making process, local authorities in South West England are currently engaged in discussions. Consideration has been given to using the old South West Region as the STB. This would be a large geographical group with different characteristics stretching from Gloucester (M5), Bristol/Swindon (M4) and Bournemouth/Poole (A31/M27/M3). Current proposals suggest two STB's based on a north / south basis. Regardless of the outcome of this discussion the South West region will retain a co-operative narrative focussing on shared strategic travel corridors. The development of the STBs will enable flexibility in determining investment priorities.

Discussion with the DfT suggest that the Government are looking for a bottom up approach and do not want to impose groups. As a result, an opportunity to form a regional grouping with more cohesion is being investigated. Initial discussions have focused around a South West Peninsula and if this were the case the STB could include:

- Cornwall
- Plymouth
- Torbay
- Devon
- Somerset
- Dorset

This STB would have a population of around 3 million, which is the same as England's Economic Heartland STB. The area has similar characteristics made up of a large rural area with a number of medium size towns and cities. There are no major urban conurbations of around 0.5 million which would overwhelm and shift the centre of gravity of the decision-making process.

A combined response to the consultation will be submitted by the above authorities, representing the joint commitment to working collaboratively with a view to forming a South West Peninsula STB. With respect to Devon, this response will not include any significant alteration to that described in this report or the attached paper (Appendix I), but instead extends on information from the other authorities. This is currently in development.

Eligibility & Investment Assessment

The proposed funding thresholds are for schemes between £20million and £50million, with some schemes with a strong case being eligible for up to £100million. However, it would be preferable to lower the minimum cost threshold. An important element of the MRN will be major structural renewals. However, within Devon, these will always fail to reach the proposed minimum cost threshold unless included as part of a package of improvements. A lower threshold of £10m would provide more scope for renewal, localised improvement and match funded schemes to be included (the DfT are generally looking for 20% matched funds).

4. Financial Considerations

The current consultation does not involve any financial commitments. However, reference is made to any bid requiring a local contribution. As already indicated the cost thresholds are considerable and as a result, local contributions would be proportionally high. Therefore, before any bid was made there would be a need to collect contributions from a number of sources, these could include the Local Transport Plan maintenance and capital allocations, developer contributions (either Community Infrastructure Levy or Section 106) and Local Authority capital. Historically we have a good record of putting together funds to support bids to the DfT and the plan would be to continue with this process whilst being cognisant of the financial liabilities of the Council.

5. Equality Considerations

An Impact Assessment has not been considered to be required at this stage.

6. Legal Considerations

The lawful implications/consequences of the proposals/recommendations/proposed course of action have been considered and taken into account in the preparation of this report/formulation of the recommendations set out above.

Before an STB can be set up, the relevant authorities will need to put together a draft proposal. The authorities will each need to agree to the draft proposal. The authorities must consult on this draft proposal with various bodies, and allow sufficient time for those bodies to respond. Once the consultation has been carried out, the proposal can be forwarded to the Secretary of State. The Secretary of State must be satisfied that the proposal would facilitate the development and implementation of transport strategies for the area, and that those strategies would further economic growth in the area.

The members of the STB will be elected members (who will have voting powers) and non-elected members (who will not have voting powers unless the appointed elected members resolve that they should have voting powers).

The STB is formalised by the creation of a statutory instrument ("SI") which sets out the STB's constitution and powers. The SI must be approved by the Houses of Parliament. Once set up, the STB will be a legal entity that can bring legal proceedings, be the subject of legal proceedings and enter into contracts.

The process for setting up an STB is relatively new. Based on the only STB with a statutory instrument, Transport for the North, the entire process is likely to take several years.

It is possible for a collaborative approach to be taken by the local authorities without establishing an STB. However, any such collaborative group would not be a legal entity and therefore could not enter into legally binding contracts. Further, it would not be governed by a constitution, and so discussions and decision making could be more protracted than within an STB. A collaborative group may be an acceptable solution in the short term, pending formation of an STB.

7. Risk Management Considerations

This proposal has been assessed and all necessary safeguards or actions have been taken/included to safeguard the Council's position.

No risks have been identified.

8. Discussion

County council roads deserve to get more funding than is currently available to help raise their standard and meet the current needs of the network, such as investments in the Strategic Road Network (SRN) have achieved in recent years. Those roads included in the proposed MRN comprises links that are equally important to local economies as the SRN, providing access to facilities and enabling new developments. Investment in a MRN would allow a pipeline of improvements to be identified, including opportunities to enhance these locally important links and overcoming some of the long term systematic maintenance problems, rather than just short-term repairs.

Whilst the principle of an MRN is a positive proposal which will bridge the gap between the SRN and local road network, some challenges remain. The governance of the investment at a regional level will need defining, with the preferred option being the formation of a South West Peninsula Sub-National Transport Body (STB). The details of this will need consideration, including the relationship between the STB and the existing regional bodies, such as the Local Transport Board (LTB) and Local Enterprise Partnership (LEP).

The full consultation response makes a number of specific recommendations, and is provided in the Appendix to this report.

9. Options/Alternatives

No Consultation Response Provided

Devon County Council could opt to provide no consultation response. However, this would be akin to accepting the MRN proposals as they currently stand. Whilst there are no showstoppers identified, the consultation response ensures that Devon priorities are represented.

Alternative Consultation Response Provided

The current consultation response provided in the Appendix is in draft form. Amendments prior to submission could be made to reflect feedback from Cabinet should any issues be highlighted.

No STB Formation

It is possible to represent the local MRN views without the formation of a regional STB. In this case, Local Authorities and LEPS should, in consultation with the Department for

Transport, form agreed regional groups to manage this work, ideally using existing mechanisms. The DfT have made clear they do not intend to deal with single LA's.

However, the involvement of six Local Authorities with slightly different priorities means setting a long term, but flexible, programme will involve a more complex approval process. This will then be scrutinised by the DfT and there will be competition between the different regions for funding. All this absorbs time and resources in an already stretched officer and political process.

STBs are best placed to carry out the important strategic role for the MRN. They are designed of a scale to enable regions to speak with one voice on strategic transport planning. A Statutory Transport Strategy will be developed by the STB for which they are responsible, and this will feed into the Regional Evidence Base required for the MRN process. In practice this process is already being undertaken albeit in an ad-hoc way. Bespoke single action groups have been formed to champion the development of the rail network (Peninsula Rail Task Force) and the "A30/A303/A358 Steering Group". Potentially a STB would add more weight and more cohesion to this process and champion the transport requirements of the SW Peninsula.

10. Reason for Recommendation/Conclusion

The Government is committed to creating a Major Road Network across England. The proposed consultation response represents Devon's interests and priorities.

There are several roads which are currently omitted from the proposed MRN which should be included in the MRN.

The South West remains one of the few regions not to have progressed in forming an STB. To ensure it does not continue to miss out on vital funding opportunities, it is essential to ensure this is formed as early as possible. The current favoured option is for a South West Peninsula, including Devon County Council as well as the councils of Cornwall, Dorset, Plymouth, Somerset and Torbay.

Dave Black
Head of Planning, Transportation and Environment

Electoral Divisions: All

Cabinet Member for Infrastructure, Development and Waste: Councillor Andrea Davis

Chief Officer for Communities, Public Health, Environment and Prosperity: Dr Virginia Pearson

Local Government Act 1972: List of Background Papers

Contact for enquiries: Dave Black

Room No. Lucombe House

Tel No: 01392) 383000

Background Paper	Date	File Reference
1. Nil		

**Department for Transport's Proposals for the Creation of a Major Road Network
Devon County Council Draft Consultation Response**

Core Principles

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

Devon County Council agree with the proposed core principles of the major road network (MRN). County council roads deserve to get more funding than is currently available to help raise their standard and meet the current needs of the network, such as investments in the strategic road network (SRN) have achieved in recent years. Those roads included in the proposed MRN comprises links that are equally important to local economies as the SRN, providing access to facilities and enabling new developments. Known housing allocations, as detailed in existing local plans, should therefore be included. Investment in a MRN would allow a pipeline of improvements to be identified, including opportunities to enhance these locally important links and overcoming some of the long term systematic maintenance problems, rather than just short-term repairs.

Defining the MRN

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

There is a concern that the quantitative criteria have a natural bias against predominantly rural regions, such as the South West Peninsula. This is evidenced by the limited network which has been identified in Devon, with few roads meeting the defined criteria. This has resulted in a number of locally important roads that we would wish to be included in the MRN being omitted. Further consideration should be given to other criteria which encompasses the needs of more rural regions, such as population along corridors rather than simply within towns or traffic flow relative to the geometric condition of the road. The flow along some corridors will be constrained by the existing conditions, such as width, and is therefore unable to meet the defined criteria, despite a latent demand.

Despite appearing in the MRN investment objectives and criteria, road safety has not been given a high enough priority throughout the proposals. This could be included in one of the criteria, for instance, assessing KSI accidents.

Devon County Council agree that future flows should not be used due to the amount of uncertainty and complex additional analysis these would introduce. Instead, the proposal to regularly review the network will be more reliable.

However, the future use of the network is one that should remain an important factor. Instead of using forecast future flows, growth areas could instead be considered as part of the quantitative assessment. This would help to identify roads that would be in the future MRN based on local growth to ensure that developments come forward, aligning with the objective of supporting housing delivery. Including these roads in the current MRN would allow improvements to be delivered, which in turn support the delivery of developments.

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

Devon County Council agrees with the inclusion of the proposed qualitative criteria. However, there is a possibility that these do not cover all locally important links that should be included in the MRN. There are further qualitative criteria that should be considered, such as providing rural connectivity and improving access to areas of deprivation.

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

No, there remain some sections of road that Devon County Council believe should be included which are currently omitted:

- The **A386** is a vital north-south corridor, connecting a number of communities, with a combined population of approximately 50,000, which have no alternative transport in order to access the facilities and services provided by Plymouth. On the outskirts of Plymouth in places the road carries approximately 16,000 AADT and 5% HGV. As the road travels further north traffic flows drop off, particularly after the connection with the A30 (SRN). High levels of deprivation exist along the corridor, and ensuring connectivity to the SRN (A30, A39 and A38) as well as the city of Plymouth will be vital for providing a boost to the local economies. There remains a large area of Devon with no MRN connections nearby, and a north-south connection to a major urban area is essential. For the purpose of this consultation, the road has been split into two sections;
 - **Plymouth to Sourton Cross** carries flows approaching the defined criteria laid out in the consultation document. The inclusion of this section of road is complementary to the aspirations of Plymouth City Council.
 - **Sourton Cross to Bideford** enables rural connectivity between North Devon and Plymouth.
- The **A376** is an important commuter corridor along the Exe Estuary between Exmouth (the second biggest settlement in Devon with a population of 33,000) and Exeter, carrying up to 24,000 vehicles per day. Devon County Council would want this included, linking to the Exmouth Industrial Estates. Despite meeting the defined quantitative criteria, this has not been included.
- The **A382** corridor (18,000 AADT, 3% HGV) would link the A380 MRN to the A38 SRN and enable significant housing and employment delivery in the Newton Abbot growth area. 6,000 dwellings on this corridor are allocated in the Teignbridge Local Plan. The road is not constructed to current standards and in its current form would not support the growth proposed in the area. Improvements on this route are considered a high priority. Inclusion of this route, between the A380 Penn Inn roundabout and A38 Drumbridges roundabout, would provide an additional connection from Torbay and Teignbridge to the SRN along an existing well-trafficked route and enable high quality infrastructure provision in an area with significant housing delivery planned for the near future. This route would satisfy a number of investment criteria, such as:
 - alleviating congestion,
 - supporting economic growth through improved ability to access new and existing employment sites,
 - support housing delivery by improving access to future development sites and boosting suitable land capacity,
 - support all road users by delivering benefits for non-motorised users and
 - support the SRN through improved end to end journey times across both networks, improved journey time reliability and improved SRN resilience.
- **Sherford Road** between Elburton Road and Deep Lane junction enables a continuous MRN and SRN network given Plymouth City Council's aspirations to promote the A379 between Laira Bridge and Haye Road for inclusion in the MRN. This would pass through Sherford Main Street, serving an area of significant growth.
- The **A39** between Minehead and Barnstaple enables a continuous MRN and SRN network given Somerset County Council's aspirations to promote the A39 between Bridgwater and Minehead.

- The **A388** would enable a continuous MRN and SRN network given Cornwall Council's aspirations to promote the A388 between Saltash and Launceston

It seems that additional quantitative and qualitative criteria, which provide more flexibility and proportionality, are needed to capture all the roads (including access to rural areas) that Devon County Council feel are locally significant and should be included in the MRN.

For instance, Devon County Council would wish to see the A386 corridor, connecting Plymouth and Bideford, included in the MRN. The corridor covers a large rural area which is economically dependent on Plymouth. The rural settlements adjacent to the A386, including Tavistock, Okehampton, Hatherleigh, Great Torrington and Bideford, have no alternative transport options to access the facilities and services provided by Plymouth. As such, this is a key corridor which needs to be maintained to at least the MRN standard.

Whilst this corridor does not meet the current criteria identified in the consultation document, some flexibility in the criteria to 'link economic centres' would ensure that a combined population of nearly 50,000 along the A386 corridor are able to access the city of Plymouth.

Indices of deprivation could be an additional factor considered as part of the MRN criteria. Better transport connections, feeding into the MRN, could help the economic performance of these areas and should therefore be considered for inclusion, where suitable road links exist – such as the A386. This would help align the MRN investments with the Rebalancing Toolkit, published by the Department for Transport in December 2017.

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

No

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

Yes, Devon County Council supports the proposal for reviews every 5 years.

Investment Planning

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

Local: clearly in the case of Devon, where there are 13,000km of local roads, there is a need to have a Local Highway Authority maintaining these roads in a hierarchical manner. The problem is scale. Although it is possible to fund the more important roads to a higher standard, the level of complaints from the public on the smaller roads is substantial. Consequently, the funding has to be spread thinly. The advantage is the allocation of funds to individual projects is quick and easy. There is a high level of certainty and a strong ongoing pipeline of work which minimises resources in analysis and evaluation. The evaluation is the democratic election process.

Regional: having a regional MRN network avoids the cliff edge between funding of the SRN roads and the stretched funding of the Local Highway Authority road network. The difficulties come in defining the region and then defining the regional network. The involvement of a number of Local Authorities with slightly different priorities means setting a long term, but flexible, programme will involve a more complex approval process. This will then be scrutinised by the DfT and there will be competition between the different regions for funding. All this absorbs time and resources and increases waste and inefficiency. Setting up a regional system is going to require good, efficient, equitable governance and a slick system of appraisal and long-term funding allocations which are transparent

National: recognise the need for national bodies to maintain and develop the SRN. These roads are funded to a much higher level of maintenance. This in turn provides extra capacity and safer roads. One problem is the roads at the bottom of the national hierarchy suffer from

lack of funding. This is the case for the SRN roads in the South West Peninsula. The A30 between Honiton and Southfields is of a poorer standard than some of the county roads being 5.5 metres wide in place, have regular congestion and a high accident rate.

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

There will be some confusion from the public on the role of the different regional responsibilities. LEP areas are large and have many roles related to “Enterprise”. They also have a role related to transport. If Sub-National Transport Bodies (STBs) are to be set up they need to take over the LEP’s role in transport otherwise it will be too confusing and there will be various regional bodies coming to different decisions with different funding streams.

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?

Devon County Council agrees with this proposal and is investigating opportunities for regional groupings in the South West Peninsula.

To maximise the role of local authorities in the MRN decision making process, local authorities in South West England are currently engaged in discussions to determine options for forming at least two STBs for the region. Current proposals have this split on a north/south basis. Regardless of the outcome of this discussion the South West region will retain a co-operative narrative focussing on shared strategic travel corridors. The development of the STB will enable flexibility in determining investment priorities.

This has progressed to a level for the South West Peninsula grouping where there is tentative political agreement and officers have had an initial meeting.
The STB could include:

Cornwall
Plymouth
Torbay
Devon
Somerset
Dorset

This STB would have a population of around 3 million which is the same as England’s Economic Heartland. The area has similar characteristics made up of a large rural area with a number of medium size towns and cities. There are no major urban conurbations which would overwhelm and shift the centre of gravity of the decision-making process.

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

The regional evidence base should be a relatively easy database to develop as much of the data is readily available in terms of traffic flow (by time of day and season), vehicle type, safety characteristics and proposed development. There may also be a need to incorporate physical characteristics such as geometry, road condition and structural issues. This could be more complicated, although most areas have their own highway maintenance inventories. To do this, the inventory would have to be segmented and linked to existing systems - which could present organisational difficulties.

The timescales involved in bringing schemes to Outline Business Case stage are lengthy. Devon County Council therefore agree with the statement that it would not be a good use of money to develop OBCs for all schemes that might be submitted for consideration. Instead, it should be noted that the proformas used for Highways England’s Pinchpoint Fund and National Productivity Investment Fund have worked well.

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

Devon County Council agrees that there may be a role for Highways England in some areas, particularly when proposals impact on the SRN, which provide opportunities for collaborative working. However, where there is no impact on the SRN, the involvement from Highways England should be limited as their processes can be overly complex for the type of scheme that may be more proportional and appropriate. Also, it is recognised that HE uses large international consultants and contractors. This again may not be appropriate for smaller schemes with local contractors. Developing local skills and resources would assist the local economy and create more resilience in the industry.

Eligibility & Investment Assessment

12. Do you agree with the cost thresholds outlined?

It would be preferable to consider whether the minimum cost threshold (£20m) could be lowered. An important element of the MRN will be major structural renewals. However, major structural renewals on the Devon network would always fail to reach the proposed minimum cost threshold, unless included as part of a package of improvements. A lower threshold of £10m would provide more scope for renewal, localised improvement (e.g. junction capacity improvements) and match funded schemes to be included. It is assumed that LTP can be used as a local contribution for match funded schemes.

13. Do you agree with the eligibility criteria outlined?

Yes. However, Devon County Council would prefer to see the section on public transport currently in the exclusion section to be reworded and moved to the eligibility section. This would provide better clarity and a more positive message on the eligibility of public transport schemes.

It is also proposed that the first point, which states that schemes on roads not on the MRN but are simply connected to it would not be eligible for funding, also includes an additional exception, in the instance that the road would feature on the future MRN and supports housing delivery.

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

Yes. However, the elements that form the criteria do not seem to be emphasised enough within the main body of the consultation document. These should be present and apparent within the other proposals, such as the eligibility criteria and quantitative/qualitative identification of the MRN extent.

Despite the presence of 'rebalancing' in the MRN investment assessment criteria and objectives, this does not seem to be apparent in the assessment criteria, with inflexible criteria favouring networks linking urban centres and omitting locally important routes within rural areas. As explained in the consultation document, the 'Transport Investment Strategy set out objectives and priorities for ensuring that regional rebalancing is taken into account as part of transport investment decisions. This included making sure investments reflect the needs and priorities of different areas'. However, under the current criteria, the South West Peninsula is set to lose out, with large areas not covered by the SRN or MRN and locally important roads omitted from the network. SRN investments through RIS1 and RIS2 funding do not have any investments in Devon, and without the inclusion of the roads highlighted, a further network of crucial roads in the region will not be able to have much needed improvements invested in. Given the lack of RIS investments in the South West Peninsula, this would not be in accordance with the Rebalancing Toolkit aspirations.

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.

Maintaining road safety and air quality standards across our local road network is a key element of Devon County Council's highway authority responsibilities. As such, the importance of these should be reflected in the Major Road Network eligibility and investment assessment criteria. However, these are currently only mentioned briefly despite both appearing in the Investment Assessment criteria.

In addition to this, it is felt that the need to support all road users should be more emphasised throughout the document.

Other Considerations

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

Devon County Council believe that there are several important factors that should not be overlooked when defining the Major Road Network. These include:

- Rural connectivity
- Linkages to areas of deprivation
- Linkages to services and facilities
- Lack of alternative transport corridors

It is the roads that satisfy the criteria above that form the locally important network which is not currently represented in the proposals for the MRN. Currently, Devon has a strong MRN and SRN network running parallel to the north and south coast. However, this leaves a group of rural market towns, approaching 50,000 population, in the centre of the county with no north-south link. It would be desirable to see this remedied. The A386 corridor provides the opportunity to do so whilst also meeting the criteria above.