

Proposals for the Creation of a Major Road Network: Moving Britain Ahead, a response from the Campaign to Protect Rural England.

19<sup>th</sup> March 2018

## Introduction

1. The Campaign to Protect Rural England (CPRE) welcomes this opportunity to respond to the Department for Transport's Major Road Network Consultation. CPRE fights for a better future for the English countryside. We work locally and nationally to protect, shape and enhance a beautiful, thriving countryside for everyone to value and enjoy.
2. As a charity with about 60,000 members, a branch in every county, over 200 district groups and more than 2,000 parish council members, we have long had an interest in transport policy.
3. We have decided not to respond to the specific questions outlined, but instead to set out a summary of our approach to the proposals and how we feel they could be improved for the benefit of the English countryside.

## The Principle of an MRN and its Central Policy Objectives

4. CPRE agrees with the basic premise behind the consultation, that there is an inequality between the funding of the Strategic Road Network and the Local Road Network and that government should seek to achieve greater parity between the two. However, CPRE disagrees with many aspects within the detail of this proposal, specifically in relation to the criteria for determining investment, how those funds are subsequently to be spent, the likelihood of achieving the policy objectives set out and the way the evidence base is established. These are all concerns that will be covered in this response.
5. It is very disappointing to read in the foreword provided by the Secretary of State of his wish for the MRN to "open up land to allow much-needed housing and the development of bypasses to relieve communities of intrusive traffic".<sup>1</sup> This approach continues to fly in the face of nearly 90 years of research that demonstrates adding additional road capacity only serves to induce more traffic. It is an argument at the core of CPRE's The End of the Road Report, published last year, which examined over 80 official evaluations of road schemes to see if the projected benefits transpired. From reducing congestion, to not harming the landscape to generating economic uplift, road schemes have failed on their own terms.<sup>2</sup>
6. CPRE is very concerned that DfT clearly regard the MRN as a policy intervention to open up land for housebuilding outside of existing urban centres, thus resulting in brownfield land in our major towns and cities sitting idle, whilst cherished landscapes are developed into housing estates that are rarely genuinely affordable. The resulting ribbon development will lock communities into an unsustainable cycle of car dependent development that will remain for decades to come.
7. There is a very slight recognition of the importance of sustainability on page fifteen of the consultation document, in the sentence, "solutions are not limited to adding extra miles of tarmac, but can also include making road layouts more efficient, or investing in the way the network is managed".<sup>3</sup> However, it is regrettable that this concept is not developed further in the document. We hope the Department will consider this point as MRN funding bids are developed.

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<sup>1</sup> Department for Transport: ["Proposals for the Creation of a Major Road Network Consultation: Moving Britain Ahead"](#) p.5 (December 2017) (Accessed 16.3.18)

<sup>2</sup> CPRE: ["The End of the Road? Challenging the road-building consensus"](#) (2017) (Accessed 16.3.18)

<sup>3</sup> Department for Transport: ["Proposals for the Creation of a Major Road Network Consultation: Moving Britain Ahead"](#) p.15 (December 2017) (Accessed 16.3.18)

8. CPRE believes that many of the central policy objectives which the Government seeks to realise through the creation of the MRN are very unlikely to succeed. As previously noted, there has been extensive research into the effect of road building on congestion and economic growth and neither have been shown to benefit. Whilst it is quite probable that the third objective of supporting housing delivery will be realised, this is more likely to lead to inappropriate development in rural locations than the creation of the affordable homes in the right locations. It is too early to say whether the final two objectives of supporting all road users and the operation of the SRN will succeed, as these will both heavily depend on the nature of the investment decisions that are made.

### **Investment Planning**

9. Whilst many of the details of the MRN proposals give us serious cause for concern, in particular the siloed way in which they approach transport policy, there remains scope for investment planning within the newly created MRN to benefit communities. This would however, require substantial changes to some of the proposals as set out. CPRE, along with other NGOs, are calling for the minimum project budget to be reduced from the £20m limit. This would allow smaller improvement schemes to be considered, in particular measures to reduce noise, air, and light pollution.
10. The Department could also broaden its thinking on ways of tackling congestion by supporting bids by local authorities for funding more efficient solutions like walking, cycling and public transport. Alleviating problems of congestion and air pollution would be much better served by encouraging greater modal shift as opposed to adding new bypasses and distributor roads. As such, the specific exclusion of public transport enhancements from funding bids outlined on page thirty-four is a missed opportunity for developing genuinely sustainable travel choices.<sup>4</sup>

### **Developing the Evidence Base**

11. CPRE has been observing with interest the changes to transport policymaking brought about by the creation of Combined Authorities, Metro-Mayors and Sub-National Transport Bodies (STBs). There is a clear argument that STBs can provide economies of scale that can facilitate much more co-ordinated planning and transport policy, as well as expand and promote the use of public transport infrastructure, such as through smart ticketing.
12. We note the role the Department envisages for such bodies, in the creation of the investment evidence base and the designation of which roads will become part of the MRN. We have concerns regarding the accountability structures in place and whether they will be sufficient in facilitating a genuine public dialogue with all those affected by the decisions the regional bodies will be required to make. It is notable that the overview and scrutiny procedures are vastly different to the first STB, Transport for London, in which in every other respect they are modelled upon. CPRE would like the Department to emphasise the need for regional bodies to hold transparent public engagement in order to ensure their recommendations reflect the wishes of local communities.
13. On page twenty-eight of the consultation document the Department sets out the guiding criteria for the likely content of a regional evidence base and how this would then inform a DfT Investment Programme for approval by Ministers. We would argue that the regional evidence base should also include data pertaining to the environmental impact of the existing road network in addition to research data on multi modal solutions to alleviate congestion and stimulate sustainable local economic growth. Whilst the former would assist the Department in identifying mitigation measures which could benefit from future investment, the latter would only be possible with the removal of the public transport exemption discussed in paragraph ten.
14. As the Department uses the evidence base to formulate the programme of investment, CPRE would urge all the key actors to put high quality design at the heart of any proposals made.

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<sup>4</sup> Ibid p.34

Too often in the past, communities have been scarred by ill thought through infrastructure, which alienates both road users and local communities from the landscape.

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