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Rt Hon Chris Grayling MP  
c/o MRN Consultation Team  
Department for Transport  
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19 March 2018

Dear Chris

**MRN Consultation Response from South East England Councils**

**1. Introduction and background**

- 1.1 We respond on behalf of South East England Councils (SEEC). SEEC is the cross-tier voice of local authorities in the South East, representing an area with 9.1 million residents. We are a voluntary membership body, bringing together county, unitary and district councils to promote the views and interests of all tiers of local government across the South East, an area comprising 74 local authorities.
- 1.2 SEEC members see investment to improve the efficiency of road transport as a critical component in helping to maintain the South East's success as the UK's most profitable economy. Adequate investment in the South East road network is also important given the national significance of road access to the South East's international gateway ports and airports, which are used extensively by businesses and travellers from across the UK.
- 1.3 The South East economy generates billions more in taxes than it receives in public spending and is home to a number of international transport hubs, including Gatwick, Dover, the Channel Tunnel, Portsmouth and Southampton. The South East also provides many transport access routes to Heathrow, the UK's busiest airport, which sits just over the London boundary.
- 1.4 As [SEEC's data dashboard](#) shows, over the 15 years to March 2016, the South East made the UK's highest net contribution to Treasury, paying £154bn more in taxes than the area received in public spending. This profitability plays an important role in underpinning Treasury spending UK-wide but SEEC data shows that South East growth is not keeping pace with its previous track record. Investment in South East roads (and indeed wider infrastructure) is essential to support continued economic growth and reinvigorate the South East's profitability. SEEC research shows an infrastructure funding gap of £15.4bn in the South East by 2030.
- 1.5 Creation of the Major Roads Network (MRN) brings the opportunity to channel investment into some of the South East's key routes to help address the congested and poor quality road network that is damaging business prospects and making the UK less attractive as a global investment option for businesses.

- 1.6 We hope the MRN will be an opportunity to ensure investment in roads that support economic growth, productivity and profitability across the South East. By combining physical improvements with new transport technology and innovation there is scope to improve travel capacity, reduce congestion and support inward investment and business growth. Investment to improve infrastructure will help local authorities in progressing local plans and unlock potential for housing and employment sites identified in those plans.
- 1.7 Our response below focuses on three main areas: MRN objectives & principles; identifying the MRN; and roles & responsibilities.

## 2. MRN objectives & principles

- 2.1 We are pleased to see that the MRN objectives apply some of the key points covered in SEEC's [Missing Links report](#) – for example reducing congestion and offering packages of improvements on key routes.
- 2.2 SEEC welcomes the high level objectives and principles proposed for the MRN, however members want to highlight two particular areas – funding and making roads better for all users – where some additional detail should be added.
- 2.3 **Certainty of funding** is strongly supported but additional points should include:
- Detail on the length of funding certainty. Long term commitments for a minimum of 5 years are important to allow effective forward planning for a programme of improvements.
  - Provision for ongoing revenue funding for MRN maintenance in addition to capital allocations for MRN improvements. Road maintenance is a high priority for local authority residents and poorly maintained roads prevent routes operating at maximum efficiency.
  - To ensure adequate funding of the new MRN, it will be important to maintain a distinction between funding sources for MRN schemes and Strategic Road Network (SRN) schemes. It is not appropriate that smaller SRN schemes should be considered for funding out of the new MRN pot. Responsibility for funding SRN schemes should remain with Highways England.
- 2.4 The objective about **making roads better for all road users** should include greater priority for road safety measures and steps to reduce the environmental/ air quality impact of the MRN.

## 3. Identifying the MRN

- 3.1 Across SEEC members there are a range of views on the specific roads to be included in the MRN. However SEEC supports the principles for road selection put forward by colleagues at Transport for the South East (TfSE), including:
- Use of two-tier traffic flow as the starting point for identifying the most economically important local authority roads. However, as one year of data may not give a representative position, comparisons should consider the average of the most recent 5 years of data.
  - Applying a graduated scoring system to sense check data – for example only including roads that meet two of the three qualifying criteria (annual average daily flow; percentage of light good vehicles; and percentage of HGVs).
  - Avoiding automatic inclusion in the MRN of all de-trunked roads as local circumstances may mean other routes are more appropriate. In many cases de-trunked roads have been replaced by new routes so the original roads may no longer meet MRN criteria. All roads should be considered for MRN inclusion on their current merits rather than their former status as trunk roads.
- 3.2 SEEC also supports the TfSE case for increasing MRN designations in the South East to redress the fact that the South East has a smaller-than-average proportion of the SRN. Given the economic importance of the South East outlined in paragraphs 1.2 to 1.4 above, we support TfSE's case that the South East has roads with a stronger claim for MRN status than some de-trunked stretches elsewhere in the country. TfSE calculations estimate that, with 67 miles of SRN per million population, the South East has 15% below the English average,

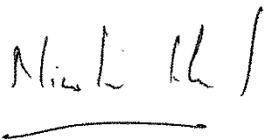
despite higher traffic volumes. South East motorways carry 10% more traffic per mile than the national average, and South East dual carriageways are nearly 40% busier.

- 3.3 Other important factors to be considered in designating South East sections of the MRN include the following to ensure the network is both coherent and can support future planned developments:
- Provision of good quality links between the South East's network of main employment centres and the major population centres where their workforce and customers live.
  - Working with local authorities to make sure the MRN can support forthcoming housing and employment sites identified in local plans.
  - Recognition of the growing importance of orbital routes in the South East to provide intra-regional links between housing and employment areas, in addition to established radial routes from links to London and beyond.
- 3.4 Once established, a 5-year review cycle for the MRN appears to strike the right balance between stability and the ability to adapt to meet developing needs.

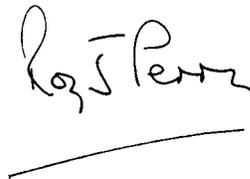
#### **4. Roles & responsibilities**

- 4.1 As the MRN proposals move to the next stage, more clarity will be needed on how the DfT will assess and prioritise regional evidence bases and how this will be conducted fairly and transparently.
- 4.2 Funding assistance will also be needed to help local authorities and their partners prepare the required detailed evidence bases.
- 4.3 Where Sub National Transport Bodies (STBs) are involved in preparing evidence bases and proposals, SEEC members are keen to ensure that the STBs involve all tiers of local authority in their work. This principle underpins SEEC's own work as an organisation representing county, unitary and district councils. The same principle is also important to work on the MRN, and indeed wider transport decisions, as district councils' local plans play an important part in determining the location and size of new developments. By pulling together an all-tier picture of future developments in this way, local authorities could also be well-placed to assist DfT in future reviews and funding decisions for the MRN and SRN.

Yours sincerely



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Chairman South East England Councils &  
Leader, Tonbridge & Malling BC



**Cllr Roy Perry**  
Deputy Chairman, South East England Councils &  
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