



Transport for London City
Planning

5 Endeavour Square Westfield
Avenue Stratford
London, E20 1JN

Phone: (020) 3054 7023
Email: AlexWilliams@tfl.gov.uk

London Councils
Policy and Public Affairs Division

59½ Southwark Street London SE1
0AL

Direct line: 020 7934 9945
katharina.winbeck@londoncouncils.gov.uk

MRN Consultation
Department for Transport
3/24 Great Minster House
33 Horseferry Road
London
SW1P 4DR

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Dear Tricia Hayes,

Proposals for the Creation of a Major Road Network - TfL and London Councils' Joint Consultation Response

Thank you for the opportunity to respond to the consultation on "Proposals for the Creation of a Major Road Network (MRN)". This is an important consultation as it will shape the future of investment in the UK's MRN and will have significant implications for the future funding of London's roads.

Transport for London (TfL) and London Councils are responding jointly to this consultation, in view of the fact that we collectively manage the road networks of London and share objectives on its future management. TfL is the highway and traffic authority for the Transport for London Road Network (TLRN) and the traffic authority for the Greater London Authority's side roads, and is responsible for managing all of London's traffic signals. TfL works closely with London's 32 boroughs and the City of London who have responsibility for the rest of the road network (which makes up 95 per cent of the network). Attached to this letter is our detailed response.

In addition to this joint response on behalf of London, the Urban Transport Group's (UTG) Strategic Highway Group has developed a response following on from a discussion with the transport bodies they represent, reflecting their thinking. TfL agree with the UTG's calls for the transport needs of urban areas to be given greater consideration in the creation of the MRN and associated funding mechanisms.

TfL and London Councils have carefully reviewed the proposals for the MRN and we welcome the fact that this will enable the Vehicle Excise Duty paid by Londoners to be invested in London's road network. Whilst we recognise the opportunities that the MRN could bring at a national level, we would like to emphasise the importance of ensuring that the principles of the Roads

Investment Fund reflect the needs of urban roads. We believe urban areas present different characteristics which justifies a distinct approach. Overall urban areas have to accommodate higher volumes of people travelling on their road networks which generally have more competing demands within limited road space.

For the longer-term, we would greatly value working with you to develop an effective and sustainable funding model for London's roads which ensures that London can continue to compete internationally and play its central role in the health of the wider UK economy.

Signed



Alex Williams
Director of City Planning

Email: AlexWilliams@tfl.gov.uk

Direct line: (020) 3054 7023



Katharina Winbeck
Head of Transport, Environment and Infrastructure

Email: katharina.winbeck@londoncouncils.gov.uk

Direct line: (020) 7934 9945

Proposals for the Creation of a Major Road Network – Department for Transport Consultation

Transport for London and London Councils Joint Response

The following document provides a high level response to the points and principles put forward as part of the Major Road Network (MRN) proposals. We welcome the proposal which recognises the strategic nature of many roads that are not part of the Highways England (HE) Strategic Road Network (SRN). We believe there are significant benefits to road users of planning our networks more consistently and that the proposed creation of a MRN could help enable this.

In considering our response to the potential definition and function of the MRN, we are mindful of the fact that road networks outside major urban areas (like London) cater for significantly different types of traffic. Journeys are predominately longer and dominated by car use compared to urban strategic corridors which cater for much higher levels of public transport, cycling and walking, alongside freight and car use. Hence, in our response, we highlight the potential to evolve the MRN proposals by recognising differences between urban areas and non-urban areas, so that it can address the needs of major roads within cities such as London. Here the pressures on the transport system are very different and the national economic importance of a well-managed network is particularly high.

The MRN in Urban areas

Like the UK's other major cities, London is a hub of productivity and new opportunity due to its density and connectivity. Efficient movement of people and goods has enabled London to grow, producing jobs and tax revenue which has then been used to the benefit of the entire UK economy.

London's population is forecast to rise from the current 8.7m to 10.8m in 2041. Over the same period, we expect the number of trips made in London to increase by 6 million. With eighty per cent of journeys in the Capital made at street level, London's major roads will need to cater for more journeys. At the same time we need to address the health and environmental impacts of these journeys and make them as safe as possible and maintain London's contribution to the national economy.

It is therefore crucial for us to make the most efficient use of London's road space. As part of this, we place priority on developing schemes which support public transport, cycling and walking to enable high volumes of people to be transported on our space constrained network and maintain capacity for freight and servicing trips. This will need to be delivered in the context of appropriate demand management measures.

There are already a number of stretches of the proposed MRN (such as the A4, A2016 and South Circular) where trips by bus and cycle account for over one third of all trips. Therefore, in looking at how the MRN can be made to function more efficiently in future, we need to also be able to cater for these modes, alongside targeted improvements to improve reliability of journeys for freight and servicing.

We would like to work with the Department for Transport to ensure that the creation of the MRN supports transport and economic goals in urban areas. This includes the need to increase the proportion of travel that is made by active, efficient and sustainable modes, and reducing car travel with its associated congestion and pollution. We believe that a more tailored approach to urban areas would be more beneficial. In particular, this would mean:

- Recognising that in urban areas schemes should address the needs of those travelling by public transport, by bicycle or on foot, for example drive reliability improvements for bus journeys, and freight and servicing trips as a priority
- Ensuring that the approach to assessing schemes for funding will be fair to Londoners, with investment reflecting the size of their Vehicle Excise Duty (VED) contributions

Our suggestions regarding how the Roads Investment Fund could be used to support improvements to roads in urban areas and how the principles and criteria used to identify and assess potential schemes could be refined to support the efficient use of the limited street space within the Capital are outlined below.

MRN core principles

Funding Certainty

As mentioned earlier, we welcome the possibility set out in the MRN consultation for VED revenues to be devolved to non HE roads which could enable investment in vital maintenance and renewals on the Transport for London Road Network and provide funding to the London boroughs for the remainder of the roads in London. We are concerned however, that the MRN funding mechanisms proposed (whereby we would bid for funding for individual schemes) would not provide the certainty and sustainable funding source that is needed for London's roads.

We would like to propose an alternative approach to allocating funding. In view of the commitments of this Government to devolution, and the importance attached to the role of city mayors in leading investment decisions for their urban areas, we recommend that a proportion of the Roads Investment Fund is ring fenced for urban roads and devolved to authorities in major urban areas - including London - to invest in schemes aimed at delivering improvements to the local strategic road network. This would result in the creation of a funding stream for the urban elements of the MRN.

This would be aligned with principles of devolution to local government where most appropriate and empower these agencies to invest in line with local strategic priorities. We believe that in London, the Mayor and the London boroughs are best placed to identify the investment priorities for London's roads.

Consistent Network

We agree with the "consistent network" principle and support the use of qualitative criteria to achieve this. However, the proposed MRN is limited to roads with high vehicle flow which would exclude a number of strategic roads in London, which experience high overall people movement flows due to their concentrations of public transport and movement by bike and foot. On this basis, in terms of the 'strategic' operation of the road network in London, we believe a number of other roads may be relevant.

We would seek to ensure that any difference in the approach to managing roads within the GLA boundary was not at the expense of a joined up approach with our

neighbouring authorities. TfL's response to the SRN consultation makes it clear that we are keen to work collaboratively across the GLA boundary to optimise the efficiency of the network.

Defining the MRN

As highlighted earlier, we believe that there are alternative approaches to defining the MRN for urban areas that merit consideration.

The proposed methodology in the consultation document uses Annualised Average Flow and freight data to determine the roads included in the network. However a number of roads that carry high number of vehicles and are undoubtedly part of London's major road network (such as the A10 and the A2 including Blackwall tunnel), are not included. In addition, no roads within the north and south circulars are included despite high vehicle and people movement.

Furthermore, the methodology applied does not reflect overall volumes of *people* (as opposed to vehicles) moved in corridors; in particular those moved by bus and coach. An alternative approach would consider the overall volumes of people moved and ensure that investment is focussed on the most important locations on the network for ensuring its efficient operation.

In a space constrained city, our aim is to make maximum use of corridor space to enable movement. We have used one of our analytical tools, the Outcomes Delivery Tool, to compare vehicle and people movement with the proposed MRN. This comparison has shown that there are a number of roads in London where public transport (bus) links, walking and cycling represent a greater modal share than cars but are excluded from the MRN (especially within the Inner Ring Road). Examples are Victoria Embankment in central London, the A3 near Kennington, and London Bridge. The A23 in south London is another example of where the number of people moved by cycling and bus is greater than that moved by private vehicles.

Schemes delivered on roads with high people movement would also bring benefits to a larger number of people. Introducing metrics focussing on the volume of people movement by corridor as a measure would identify roads where investment to encourage more walking, cycling and use of public transport could reduce congestion and increase productivity. We would like a 'person journey time per kilometre' metric to be considered. This would measure modal journey times, occupancies and flows across a selection of routes to establish total people movement and the efficiency of their journeys.

We also believe there is merit in considering projected changes and future aspirations for London's roads in the definition of the MRN. This would allow us to identify transformational schemes to increase the capacity and sustainability of the network. Under the current proposals, a number of locations where investment would unlock significant delivery of housing in London are excluded from possible funding for example the development of Lillie Bridge Depot at Earl's Court and land at Royal Oak could unlock thousands of homes. The transport modelling underpinning the MTS should be used as an indication for forecast scenarios in London.

Finally, we believe that the qualitative criterion which aims at linking economic centres should be revised in line with London's characteristics. There are a number of economic centres, such as Barking and Kingston, which contribute substantially to the economy in London and attract many local trips but are potentially below the proposed threshold. Providing efficient transport links to and from town centres is crucial to supporting London's economy. We believe that a threshold in relation to productivity would better suit London's town centres, and those of other UK cities.

Funding assessment criteria and eligible schemes

Our view is that the objectives and assessment criteria for the MRN would benefit from more consideration being given to road danger reduction, access for freight and servicing, impacts on the environment, likely growth areas and health challenges in urban areas. As outlined above, we would support the inclusion of public transport enhancements as eligible schemes, as these can enhance the overall efficiency of road corridors by moving more people within a constrained street space.

We would like to suggest an alternative objective which aims at "optimising the use of road space". Additional criteria for this objective would be focused on promoting active, efficient and sustainable modes by increasing the mode share of walking, cycling and public transport. We believe that additional scheme types would also be more suitable for London and other urban areas reflecting the needs and local priorities of roads in urban areas. Examples could include:

- Schemes which make more efficient use of road space and reduce air pollution by encouraging mode shift from cars, creating new public transport links, cycling and walking routes, improving the efficiency and reducing the danger of freight and servicing vehicles
- Schemes which aim to reduce road danger, in particular collisions involving vulnerable road users
- Schemes which aim to maintain and renew existing roads to reduce the likelihood of incidents leading to additional congestion

The role of Highways England

We welcome the proposed role of HE in helping to establish a more coordinated planning approach in managing the MRN Programme. As part of this, we would like to ensure that HE considers London's priorities when providing support for the programme and advice on scheme delivery. This would include the suggestions made regarding road space efficiency and the wider promotion of active, efficient and sustainable modes of transport. As mentioned in our response to the SRN consultation, we would like closer partnership working at a strategic level, in managing the SRN and in defining the MRN to jointly agreed objectives.

Financial Context

We have previously highlighted our concerns about the lack of funding for London's roads and the implications for the UK economy. This is why we would like to work with you and your officials to develop a more sustainable funding model such as a

ring-fenced funding as suggested above. This is to ensure that London has the funding it needs to invest appropriately in its road network and, in the longer term, ensure a sustainable roads funding model, which may also be applicable to other cities and urban areas in the UK.

While London's population has grown considerably faster than that of the rest of the UK, government financial support for London transport has fallen very significantly. Prior to the 2013 Spending Review, TfL received an operating grant from government of just under £2bn each year. In the 2013 Spending Review, half of this grant was devolved into retained business rates and the remainder was cut by around 25 per cent. In the 2015 Spending Review, government announced that TfL's remaining operating grant would be phased out entirely by 2018/19. This means that from this April TfL will receive around £1 billion less each year in revenue funding compared to 2012/13. This is also within the context of significant funding cuts to local authorities; over the decade to 2019-20, core funding from central government to London local government will have fallen by 63 per cent in real terms on a cumulative like-for-like basis.

As a result of the loss of revenue funding and despite driving record levels of savings, TfL has had to significantly reduce its programme of proactive road maintenance on both TfL and borough roads. This has demanded cuts to the Local Implementation Plan funding, which pays for most of the maintenance on roads managed by local authorities. While TfL will ensure that the safety of the network is maintained, proactive maintenance is clearly a more effective and cost-effective way of keeping London's roads in good condition rather than responding to issues through emergency works.

TfL and the boroughs are doing all they can within the current funding envelope but, without government support and a sustainable funding source, spending on London's roads will suffer. In the short term, we believe the MRN could provide a route for financial support for London's roads and should be established in a way that works for London and other urban transport authorities.

We need to work with the Government to develop an effective and sustainable funding model for London's roads to ensure that London keeps moving; remains open to business and investment; and continues to bring significant benefits to the wider UK economy.

As outlined here, and in TfL's previous response on the SRN, we believe that there is a strong case for Government to consider devolving parts of the Roads Investment Fund to the Mayor of London, TfL and the London boroughs. This could help to provide an opportunity for avoiding a major degradation in London's roads and potentially, be part of the longer-term funding certainty for all UK cities that manage Major Roads. For the longer-term, we would greatly value working with you to develop an effective and sustainable funding model which ensures that London can continue to compete internationally and play its central role in the health of the wider UK economy.