

DfT Proposals for the creation of a Major Road Network

15 March 2018

<https://www.gov.uk/government/consultations/proposals-for-the-creation-of-a-major-road-network>

About the London Cycling Campaign

London Cycling Campaign (LCC) is a charity with more than 40,000 supporters of whom 12,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

This response was developed with input from LCC's borough groups.

General comments:

The reclassification of existing roads to create a "Major Road Network" (MRN) is not in itself particularly troubling. However, both the tone and the detail of this specific proposal indicates it is being thought of and couched in the narrowest terms possible – solely focusing on private motor vehicle usage.

Overly focusing on private motor traffic to the detriment of other modes and approaches to transport, risks undermining the Department for Transport's (DfT's) own policies. The DfT's Cycling and Walking Investment Strategy document was subtitled: "We want to walking and cycling the natural choices for shorter journeys, or as part of a longer journey."

In his foreword to the document the Secretary of State for Transport, Chris Grayling, not only repeats the above statement but also says: "For too long, some have seen cycling as a niche activity, rather than a normal activity for all. If we can increase levels of walking and cycling, the benefits are substantial. For people, it means cheaper travel and better health. For businesses, it means increased productivity and increased footfall in shops. And for society as a whole it means lower congestion, better air quality, and vibrant, attractive places and communities."

The Minister also states: "We aim to double cycling activity by 2025 and each year reduce the rate of cyclists killed or seriously injured on English roads." This aim needs strong and active support from all sections of government, in the broadest possible sense, if it is to be realised. That means considering active travel and other modes on a regional basis, and in a strategic sense. It also means a change of attitude across government away from considering improving road capacity for private motor vehicles as beneficial, and towards, scheme by scheme and strategically, enabling alternatives to private motor vehicle usage.

In this proposal however, the vast majority of the approach proposed, the examples given, and the language used all point towards an assumption that the road network is primarily used by and designed for motor vehicles and always will be; but more, that there will not be substantial "rebalancing" away from motor vehicles to other modes, not just on the MRN but also in terms of, for instance, how people access housing developments.

Given the clear evidence, and international approaches that play in stark contrast to the current governmental approach and this document, it is difficult to see how this proposal, and approach, can contribute positively to attempts to reduce pollution, avoid climate-changing emissions and tackle the inactivity crises, much less simply enable more people to walk, cycle and use public transport more and drive less.

Of particular note, the government has recently been told its action and proposals on pollution and illegal air quality levels are unlawfully insufficient for the third time. This has led to an unprecedented joint inquiry of four Parliamentary Committees that calls air pollution “a national health emergency”, with Lilian Greenwood MP, Chair of the Transport Select Committee saying: “Transport is the key to improving air quality, but it requires real political leadership and co-ordinated action from the Government and local authorities. The solution isn't just about reducing the pollution each vehicle produces, we also need policies that will reduce our reliance on cars. This requires more urgency, imagination and innovation than is being demonstrated by the Government, local councils or transport service providers” (see <https://www.parliament.uk/business/committees/committees-a-z/commons-select/environment-food-and-rural-affairs-committee/news-parliament-2017/joint-improving-air-quality-report-publication-17-19/>). This proposal, as it currently stands, would be likely to worsen air quality significantly, rather than improve it, and goes directly against the kind of joined-up approach to transport the inquiry calls for.

For these reasons, the London Cycling Campaign cannot support these proposals in their current form. It is essential that they are modified to place the MRN in a broader transport context, where alternatives to private motor vehicle capacity improvements are prioritised. This broader approach would also be in keeping with the localism agenda of government and help ensure that areas of the country such as London, that take a different approach to transport planning, have access to funding to move forward their plans without embracing the “predict and provide” model the Government appears to endorse here.

Proposals and evidence bases must be compiled and assessed on a broader range of criteria that includes shift to cycling and public transport, reduction of pollution, increased activity levels, and reduced carbon emissions. The MRN proposal and all schemes arising from it should be subject to a rigorous Strategic Environmental Assessment (SEA). And schemes should not be held to a £20 million minimum threshold.

London Cycling Campaign also supports the recommendations made in Cycling UK's response to these proposals.

Specific points about the proposal:

- Given recent legal action against the government over air quality, and given ongoing concerns over lack of governmental action on climate change, inactivity levels, active travel etc. then the proposal should be subject to a rigorous and broad SEA before approval, assessing the proposal and likely associated schemes against alternative approaches that prioritise active and public travel modes ahead of private motor vehicle capacity

improvements. If the MRN does move forward, then each scheme should be subject to similar assessment on its impact to the environment, travel by mode, air quality, activity levels etc.

- Much of our criticism of this proposal is a reiteration of London Cycling Campaign's previous response on the "Shaping the Future of England's Strategic Roads" proposals submitted in February 2018, and viewable here:
https://s3.amazonaws.com/lcc_production_bucket/files/12459/original.pdf?1518030591
- The government must prioritise other modes of transport and alternative approaches to enabling movement of goods and people as a priority above private motor vehicles. These proposals do the opposite – in examples given and approach taken they prioritise private motor vehicle capacity. Yet the well-established concepts of "induced demand" and "traffic evaporation" are visible in studies of road-building and vehicle-restriction schemes across the UK. Rather than "predict and provide" for motor vehicles, the government should seek to avoid any private motor vehicle capacity increases on any roads as the priority, by enabling alternative mode capacity improvements instead.
- The five core principles that the MRN will deliver "increased certainty of funding", "a consistent network", "a coordinated network", "clear local, national and regional roles", "a focus on enhancement and major renewals" and "strengthening links with the SRN", are not in themselves necessarily troubling – when applied to the broadest understanding of transport, they make good sense. But this proposal and document does not do that. Any MRN proposal must be seen and delivered within the context of those principles being applied across the entire transport network encompassing all modes. That means not funding and reaching for private motor vehicle capacity as the first priority. As per the point above regarding "induced demand" and "traffic evaporation", road widening, bypasses and other such schemes should be used as a last, not first, resort. Private motor vehicle traffic demand management, enabling mode switch to other, more sustainable modes, and other such approaches, should be used first.
- The examples listed of schemes that will be eligible for MRN funding also demonstrate the focus of this proposal: "bypasses", "missing road links", "widening of existing MRN roads", "major structural renewals", "major junction improvements", "variable message signs", "traffic management and the use of smart technology and data", and "packages of improvements" again demonstrate no commitment to modal shift and risk solely prioritising movement of motor vehicles.
- The use of average annual daily flows of motor vehicles only as a method of determining which roads will be designated in the MRN is highly problematic in this context, especially for London and other major cities. This does not capture quantity of people or goods moved, nor the potential change of mode share, nor the viability and many advantages gained by removing space and capacity from private motor vehicles and delivering that to more efficient and sustainable, healthy modes, particularly in urban and suburban settings (as many schemes in London are demonstrating currently). In the same vein, it is therefore likely

that schemes below £20 million could have huge positive impacts on roads that move large numbers of people and/or goods, if the focus of the scheme isn't just on increasing the daily motor vehicle flow.

- Given the above - and the stark contrast currently visible between the Mayor and TfL's policies and those of the national government - it is clear that regional control of the MRN and Regional Evidence Bases (REBs) will be important in enabling the prioritisation of active travel modes and public transport over private motor vehicles in urban areas. It is therefore vital that REBs include health (activity levels, the negative impacts of air pollution, and loss of life via collision etc.), climate change, and the potential for modal shift to reduce motor traffic volumes.), i.e. that transport is considered in the broadest possible context. Regional centres should be able to unlock MRN funding without simply using the government's narrow definition of appropriate schemes for these roads.
- Similarly, it is both indicative and problematic that the sole example of walking and cycling schemes in relation to the MRN is of a town that is being bypassed by an MRN road after which it will be improved for walking and cycling. This is an overly narrow approach to how walking and cycling can be improved around the MRN and demonstrates the motor vehicle focus of the MRN proposal. It is well known that in Holland, where a quarter of all journeys are cycled, most major roads include cycling tracks alongside. Even this simple approach, as suggested in Interim Advice Note 195/16 "Cycle Traffic And The Strategic Road Network", is missing here.
- The five assessment criteria the Government says it will assess the MRN by ("reduce congestion", "support economic growth and rebalancing", "support housing delivery", "support all road users", and "support the Strategic Roads Network" (SRN)) are acceptable criteria, if taken in the broadest possible transport context. But they must be applied in that context, and it is likely other criteria such as reduce climate changing emissions, enable modal transfer away from private motor vehicles of goods and people to alleviate motor vehicle demand, reduce pollution, increase activity levels, will also be vital.
- Using a motor vehicle volume metric approach solely to define to the MRN also risks creating or reinforcing inconsistencies in planning the existing roads network. In London, the DfT's map of the proposed MRN appears to highlight many inconsistencies in classification. Examples include missing or extra links around Abbots Langley and Leavesden around the M1, Waltham Abbey, the A13 around Aveley and Purfleet, the Blackwall Tunnel itself and the A23 north of Croydon. On top of that, the map highlights a broader, strategic difference in historical planning of motor vehicle routes and the resulting traffic between north and south London. In north London the MRN and indeed SRN etc. comes primarily in the shape of radial routes in/out of the centre; in south London, the MRN etc. involves far less direct routes (for instance, around Croydon, Bromley, Epsom, Kingston, Twickenham, Hayes etc.). Regional authorities should prepare REBs for all transport modes, with an overarching transport plan, and then bid for money on proposals emerging from that plan, rather than have their roads and approach to those roads dictated by a government and/or transport

department that appears to view other modes of transport, and transport's wider context, as largely irrelevant.

General points about highways schemes:

- LCC requires schemes to be designed to accommodate growth in cycling. Providing space for cycling is a more efficient use of road space than providing space for driving private motor vehicles, particularly for journeys of 5km or less. In terms of providing maximum efficiency for space and energy use, walking, cycling, then public transport are key.
- As demonstrated by the success of recent Cycle Superhighways and mini-Holland projects etc., people cycle when they feel safe. For cycling to become mainstream, a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic is required to/from all key destinations and residential areas in an area. Schemes should be planned, designed and implemented to maximise potential to increase journeys – with links to nearby amenities, residential centres, transport hubs considered from the outset.
- Spending money on cycling infrastructure has been shown to dramatically boost health outcomes in an area. Spending on cycling schemes outranks all other transport mode for return on investment according to a DfT study. Schemes which promote cycling meet TfL's "Healthy Streets" checklist. A healthy street is one where people choose to cycle.
- All schemes should be designed to enable people of all ages and abilities to cycle, including disabled people.
- LCC wants, as a condition of funding, all highway development designed to London Cycling Design Standards (LCDS), with a Cycling Level of Service (CLoS) rating of 70 or above, with all "critical issues" eliminated.