

Appendix 1 - WYCA response to the DfT consultation Shaping the future of England's Strategic Roads (RIS2):

SHAPING THE FUTURE OF ENGLAND'S STRATEGIC ROADS - DEPARTMENT FOR TRANSPORT (DfT) CONSULTATION ON HIGHWAYS ENGLAND'S STRATEGIC ROAD NETWORK INITIAL REPORT

This is the collated response of the West Yorkshire Combined Authority and the five West Yorkshire Local Authorities of Bradford, Calderdale, Kirklees, Leeds and Wakefield. The Combined Authority and its partners welcomes the opportunity to respond to this consultation from the DfT.

West Yorkshire Combined Authority is also a partner within Transport for the North (TfN). TfN has responded separately to this consultation on behalf of all of its 19 Local Transport Authority partners and 11 Local Enterprise Partners.

Our comments are informed by review of the following documents:-

- DfT's 'Shaping the Future of England's Strategic Roads' Consultation on Highways England's Initial Report and DfT Analysis to inform RIS2;
- Highways England's Strategic Road Network Initial Report and Highways England's analytical methods to inform proposals for the second Road Period (2020-25)

OUR RESPONSE

1. Do you think Highways England's proposals will deliver what users of the SRN want? If no, what could be done differently?

Overall the consultation documents provide an encouraging strategic overview of future road investment and a common sense approach to managing the SRN, which aligns with the West Yorkshire Combined Authority and its partner's vision and requirements of modern, high performing transport connections that will deliver economic growth and a thriving North of England.

The Initial Report provides a high-level understanding of Highways England's ambitions. The broad aspirations of the Initial Report support the West Yorkshire Transport Strategy 2040's aspirations to see investment to improve performance on the Strategic Road Network (and also on the local road network) to add capacity where needed to improve journey times, reliability and resilience and also to deliver improvements in journey quality and safety, and information to aid journey planning. The policies contained in the West Yorkshire Transport Strategy were informed by two rounds of public and stakeholder consultation and identified a wide range of SRN users including drivers and passengers in cars, but also vans, lorries, coaches, buses taxis and motorcycles - and pedestrians and cyclists which interact with the SRN.

The West Yorkshire partners are encouraged that the role of Strategic Transport Bodies (such as TfN) is recognised and by the statement of intent to work closer with partners to jointly agree priorities and investment for roads. The Initial Report proposals align with TfN's long-term transformational planning. TfN Strategic

Transport Plan is currently out to consultation (to 17 April 2018) and in it TfN makes the case for transformational and sustained investment in the North's transport connectivity as being critical, both between and within the cities of the North. The STP will provide a pan-northern statement of investment priorities and the benefits sought in the form of Conditional Output performance indicators for the Strategic Road Network (SRN) and a Major Road Network (MRN).

We are positive that the creation of a National Road Fund to create long term funding for major roads will give greater certainty of pipeline and assurance to the supply chain. We note that hypothecated funding from Vehicle Excise Duty to fund improvements to the SRN and MRN could lead to those road users using or affected by these networks but not subject to VED (including, pedestrians, cyclists, equestrians and owners of zero-emissions vehicles) having less influence or input into investment delivered by the National Roads Fund.

Furthermore, levels of VED income in the longer term seem subject to uncertainty given the increase of electric vehicles as a proportion of the overall fleet - with some forecasts for zero-emission/electric vehicles to form more than half of all new car registrations by 2027 (Go Ultra Low, 2016). We suggest that the design of the National Roads Fund and the communications around its implementation are carefully planned, in recognition of these sort of unintended consequences.

The SRN Initial Report succeeds in clearly identifying the wide range of users benefitting or affected by the SRN, but this is not matched by the DfT Consultation document which identifies road users as being those that are liable for VED. In our view all users, whether subject to VED or not, should have equal opportunities to engage with future investment decisions. This is consistent with our Transport Strategy which seeks to balance the needs of all road users.

We welcome the recognition that Highways England's future Road Investment Strategy (RIS) may commit to investment in the local road network, or other transport modes, where it is anticipated that doing so would have a positive impact on the operation of the SRN - but we ask for clarity on how this will be considered and delivered in the development of the next RIS period (RIS2).

We welcome the reference to the benefits of establishing a Major Road Network. Detailed West Yorkshire comments will be provided separately as part of the response of the Combined Authority and its partners to the DfT consultation on its Proposals for the Creation of a Major Road Network - but a key theme of our response is expected to be the disparity between the extent of the indicative MRN shown in the DfT MRN consultation material and the more comprehensive MRN for the North proposed by TfN which has been developed with the input of northern partners - and the implications that this may have for the scale and nature of funding of improvements away from the Strategic Road Networks.

The Initial Report understandably adopts a flexible approach to identifying investment priorities at this stage, but to answer this question fully it would have been helpful to be given clearer indications of the proportion of any given funding that each proposal would receive. There is a lack of clarity on which elements Highways England will prioritise for delivery and when. Similarly the Initial Report

identifies seven key challenges but it would be useful to see an action plan on how these are to be addressed.

Further detail on the integration of the SRN with Public Transport could have been provided. Public Transport is a key issue for our adopted WY Transport Strategy and we are keen to support the sustainable delivery of this provision via alignment with SRN enhancements. Additionally, questions arising from growth in Mobility as a Service are not well dealt with.

The West Yorkshire partners are aware that the National Audit Office's report: "Progress with the Road Investment Strategy", (March 2017) has had some far reaching implications in terms of Highways England's capacity to deliver the ambitious number and complexity of improvement schemes set out in RIS1. We are encouraged by the ORR's "Benchmarking Highways England" report of December 2017 that shows Highways England making good progress in identifying and implementing efficiency improvements.

The findings from the Nichols Report: "Sample based review of Highways England's major schemes" (March 2017) show that there are certain elements that need to be addressed when delivering a programme major schemes, in particular:

- There is an apparent culture of over-emphasis on delivery to timescales
- Baseline costs set at too early a stage in development
- An apparent insufficient definition and specificity of project requirements and RIS performance metrics that are effectively applied at a project and option level.

The West Yorkshire partners would like to see evidence that these issues will be addressed in RIS2 and that there is certainty of the benefits, costs and deliverability of the programme.

From a local perspective we wish to see a firm commitment to delivering the schemes that were either rescheduled or identified as needing further development work to achieve an acceptable return on investment in the Supplementary Delivery Plan published on the 19th October 2017. For our region this is ensuring that the further work required for the M62/M606 Chain Bar scheme is progressed as a matter of urgency and is delivered within the RIS2 period.

2. Do you think Highways England's proposals will deliver what businesses want? If no, what could be done differently?

Congestion is costly for businesses and freight operators. By investing in the proposals set out in the Initial Report, Highways England can make a tangible difference to the running of businesses, improving their efficiency and productivity.

Congestion on the M1 and M62 is especially critical for business operations in West Yorkshire and the Leeds city Region given the location of the SRN within a dense and extensive urban area with multiple centres. Movement along these corridors is critical for moving goods, people and services. Our Leeds City Region Strategic Economic Plan (SEP) identifies a range of Spatial Priority Areas for growth across the City Region. Many of these Spatial Priority Areas rely on connectivity with the M62 corridor particularly to provide access to labour and markets. This specifically

includes our Enterprise Zone sites in the West Yorkshire districts of Bradford (via the M606), Calderdale, Kirklees, Leeds and Wakefield (via the M1). Enhancing road connectivity is also key for our emerging residential/mixed use sites e.g. North Kirklees Growth Zone, Bradford Land and East Leeds Extension. For sites of this scale, suitable highway and SRN access can be key to unlocking growth, whilst also enhancing market/developer confidence when making strategic and long term investment decisions. To support development of these strategic sites we would welcome recognition that delivery in these locations will often span multiple 5-year investment periods e.g. 15 years + in some cases. Therefore a longer term view and certainty is required. TfN's 30 year investment programme is expected to have a positive impact for long term spatial planning in pursuit of economic objectives.

Recent Local Plan Examinations in West Yorkshire have demonstrated the Government-appointed Inspectors views on the importance of the SRN to bringing forward district's growth ambitions in terms of employment and housing allocations. This has been illustrated than in recent infrastructure discussions around the importance of the M62/M606 Chain Bar improvements. This is a recognised location of existing congestion and it is critically important to find a solution to the problem now as well as ensuring that the economic aspirations of the local District authorities and the wider region are met by ensuring the safe and efficient passage of vehicles through this junction.

More detail could have been provided on personalised travel information e.g. how and when it will be made available for individuals, business and freight operators for both pre and in-journey information – this could make significant improvements for more reliable and resilient end to end journeys

Easy access to reliable information will be particularly helpful for freight haulers, enabling them to reduce their journey times and meet deadlines. Much improved driver facilities on or close to the SRN have also been highlighted by the Freight industry through our West Yorkshire Transport Strategy engagement as necessary to support the growth, resilience and efficient operation of the industry. The Initial Report could however provide more detail on changing requirements for the movement of goods and how the SRN can adapt to those changes.

We welcome the review of current diversionary routes. It is vitally important that work to develop the RIS2 programme (and parallel work to define and enhance a Major Road Network) includes work to establish and improve the most suitable diversion routes and proactively advertise these routes. The importance of this will only increase as the need for roadworks increases and it will be central to ensuring customer satisfaction.

The reliance on the M62 as the main trans-Pennine east-west route is an issue that needs to be resolved in consultation with stakeholders and partners. As the highest motorway in the country this heavily trafficked route is subject to severe weather related and traffic incidents. Frequent minor incidents (e.g. breakdowns) cause delays on local roads, with major incidents and closures causing gridlock for many hours before these roads can return to normal operating conditions. This situation has a significant impact on the operation of businesses, communities and partner agencies to deliver vital services. Alternative routes on local roads including the

Emergency diversion routes are unable to cope with the volume of traffic and are unsuitable (with low bridges and narrow roads) through towns and villages.

The integration of the SRN with local roads is a key consideration. The quality of the connections between these two networks can make all the difference for business movements and for realising development opportunities. Nationally the SRN makes up just 2% of the road network. Within West Yorkshire there are 100 miles of motorway and 6,000 miles of local roads managed by the five West Yorkshire Local Authorities. Accessing and making best use of the SRN requires a fit for purpose local road network providing appropriate capacity and performance in the right places. The Combined Authority and the West Yorkshire Local Authorities have adopted a 400m local Key Route Network supported by collaborative working practices to enhance our relationship with the SRN and Highways England, and the West Yorkshire partners are working with TfN to identify and establish a Major Road Network that includes the most important elements of this network that support pan-northern movements between our important Economic centres. Our view is that the MRN should receive significant investment to provide a network that better connects with and compliments the SRN. The Initial Report doesn't provide a clear sense of how the better integration of the SRN and MRN could work.

Continued upgrades of key motorways to smart motorways should also have a positive impact on businesses in the North. Recently completed RIS1 Smart Motorways operation to the M62 has been largely beneficial. However there is need to address the impact that this is having on junctions where bottlenecks are becoming evident.

All lane running has gained some extra capacity however relatively minor incidents such as breakdowns are causing significant impact as lane capacity is reduced causing disproportionate delays on the motorway and local road network. The use of rapid intervention to deal with incidents and return the SRN to normal operating conditions is now more imperative. Collaboration with local highways authorities working together to manage incidents on our respective networks and the provision of real time information for road users has also become more imperative. We would welcome greater clarity about how this will be achieved.

The Combined Authority and its partners are also supportive of proposals to future-proofing investments in respect of new technologies (connected and autonomous vehicles) as it will open more development and employment opportunities for residents in the North. We need however need to understand the impact and risk this will have on managing our respective road networks and we would welcome more clarity and understanding of the policy/strategy and operational impact of applying these advances in technology.

3. Do you think Highways England's proposals meet the needs of people affected by the presence of the Strategic Road Network? If no, what could be done differently?

The West Yorkshire partners welcome the environmental ambition included in the Initial Report and comments about enhancing the environment. Highways England

should seek to go beyond mitigation of impacts to an active role in enhancing the environment in which the SRN exists.

With respect to air quality, we welcome the report's recognition of the impact that that traffic on the SRN has on local air quality and the role of the Highways England. Poor air quality is not simply generated on local authority roads and solely a responsibility devolved to them for appropriate action, and Highways England should support and lead on activities to create cleaner, healthier environments. We endorse the establishment of an air quality monitoring network to monitor air quality, however there needs to be greater consideration of HE's role in improving air quality, especially for urban sections of the SRN which pass through densely populated areas. Emissions generated on the SRN will have an impact on the West Yorkshire partners' ability to deliver the policies within the West Yorkshire Transport Strategy 2040, and the objectives of the West Yorkshire Low Emission Strategy – as well as local authorities' ability to mitigate against poor air quality within declared Air Quality Management Areas. The Designated Fund offers an important opportunity to mitigate against air quality impacts, but further discussion will be required with Local Authorities to identify the locations of greatest concern. Highways England should use experience and measures gained through the current pilot studies to inform discussions around mitigation.

We welcome the Highways England target of ensuring 95% of the SRN will have a charging point within 20 miles however there is a significant risk in ensuring the equipment supports the proposed significant uptake of ULEVs by 2020 through greater rollout of PAYG rapid charging infrastructure. To mitigate against significant capital costs for electrical upgrades, smart technology should be used to balance charging between users, dependent on their stopping duration.

Range anxiety and perceived barriers to charge point use are seen as some of the key barriers to mass EV uptake. A PAYG network will ensure that these barriers are removed for longer journeys undertaken by EV drivers on the SRN through open and easy access to a nationwide charge point network.

Delivery of new or upgraded highway infrastructure provides a significant opportunity to deliver a range of environmental enhancements, specifically in relation to Green Infrastructure/biodiversity, air quality management and water management/flood protection. Many of our existing projects and programmes in West Yorkshire are funded from multiple sources and we regularly co-develop or fund schemes with government agencies e.g. Environment Agency. WYCA and our partners would welcome the ability to consider the how opportunities in this area could be identified, funded and delivered in the future.

The Leeds City Region Green and Blue Infrastructure Strategy sets out the ambitions for supporting 'good growth' in the region by '*ensuring everybody in the city region is within easy reach of an outstanding and well used network of green and blue infrastructure that reduces flood risks and supports health, the economy, the environment and a superb quality of life.*' The Green and Blue Infrastructure Strategy sets out commitments that include '*making quality GBI a defining feature of the way we do development and developing 1000 miles of GBI rich corridors, including*

canals, rail, road, and a city region cycle route network'. The West Yorkshire Transport Strategy recognises the benefits of Green and Blue infrastructure to enhance transport scheme delivery and includes policies to 'protect and where possible enhance our Green Infrastructure and Townscapes' through the projects we deliver.

Our Green and Blue Infrastructure Strategy includes support for a proposed White Rose Forest, which support delivery of the wider Northern Forest announced by The Woodland Trust in January 2018. We would like to see greater recognition that 'green strategic corridors' could have in developing the Northern Forest and the positive impacts that tree planting would have on reducing noise, improvements in biodiversity and supporting improvement in air quality. The latter is a key issue for WYCA and our partners, specifically notes the role of air quality in the context of inclusive growth, environmental performance and health and wellbeing.

WYCA and its partners supports the continuation of Designated Funds and the proposals for the provision of Designated Funds in RIS2 period (contained in Section 5.4) are encouraging. We support the widening of scope for the proposed Wellbeing and Environment and Connecting Communities Funds. These funds, along with the Innovation Fund will be critical to ensure that schemes can go beyond mitigation of impacts towards delivering a step change in quality of environment for communities affected by the presence of the SRN. As such the scale of funding must match the statement of ambition and stakeholders' expectations, enabling delivery at the scale and quality of intervention required. For example the need to address severance caused by the SRN will require significant levels of funding within the Connecting Communities fund in excess for the £100m available within the current Cycling Fund.

Whilst Designated Funds allow delivery of schemes to mitigate impacts caused by the existing network, the proposals in the Initial Report to enhance the SRN in the RIS2 period with ambitious schemes to provide capacity on SRN (for example the delivery of new expressways, or upgrades to existing junctions) must include high quality mitigation against impacts on other users and communities within project budgets and scope – including environmental impact, severance and social cohesion and movement and safety of non-motorised users. Existing guidance such as Highways England's own Interim Advice Note 195/16 "Cycle Traffic and the Strategic Road Network" should be adhered to within design of all new schemes, as well as due attention being paid to any other best practice or guidance relating to green infrastructure, pedestrian facilities and other considerations.

The priorities for maintaining the asset also offer the means to mitigate some impacts – but this needs to be recognised as a key part of the approach towards maintaining asset condition. Improvements to road surfaces should seek to reduce noise and tyre wear as well as reducing whole life costs. The impact of road surface on traffic noise from the SRN is particularly important as even though the proportion of zero-emission vehicles within the vehicle fleet is expected to increase, resulting in noise benefits through reduced engine noise – these are likely to be smaller on the SRN where traffic speeds are higher and engine noise becomes a significant contributor to traffic noise.

The preferred approach to asset condition of soft estate should be strengthened in its ambition to restore estate condition and increase biodiversity – a net gain in biodiversity should be achieved much earlier than 2040, and the aim should be to reduce the length of time needed to provide sufficient habitat to achieve a net gain following scheme delivery in RIS2.

4. Do you agree with Highways England's proposals for:-

Four categories of road and the development of Expressways (Initial Report sections 4.4.3 and 5.3.6)

The Combined Authority and its partners broadly agree with the four categories of road. High standards of maintenance and the smooth operation of the SRN is essential to the vision of WYCA and its partners. With four distinct categories of road, Highways England can ensure appropriate standards across the SRN, suited to the traffic demand of the location/type. The breakdown of roads will also allow Highways England to prioritise their investments and develop the network according to capacity needs.

The development of expressways will need to ensure that quality and safety of provision for non-motorised users is not reduced by the increase in capacity for vehicular traffic – the aim should be to enhance provision rather than provide “some” provision as suggested in 5.3.6, especially expressways are developed in phases 3 and 4. For example, for cycle traffic the level of provision identified in Interim Advice Note IAN 195/16 should be applied.

The West Yorkshire partners would welcome an opportunity to discuss with Highways England opportunities for the delivery of Expressways in the region (e.g. Kirklees Council highlights the potential for the A628 between junction 4 of the M67 and the M1 to become an Expressway, in line with the outcomes of the Transpennine Tunnel and the North of England Wider Transport Connectivity strategic studies being undertaken).

Operational priorities (Initial Report section 5.1)

There is a need for the SRN and local roads to function effectively together with seamless interaction - this requires good collaboration, effective operational procedures and interfaces between control and information systems of the respective managing authorities. The West Yorkshire authorities would welcome closer working with Highways England for the benefit of road users (e.g. We would support and strongly encourage further collaboration with local authorities, and implementation of co-ordinated traffic management systems, linking Highways England's UTMC with the planned West Yorkshire Key Route Network joint UTMC system). A similar point is made with regard to the planning, management and co-ordination of roadworks across the SRN and local networks. Whilst the early involvement of the local Highway Authorities is increasingly prevalent, there is scope to explore further how coordinated operations can be more effectively achieved whilst minimising delay and disruption on our respective networks.

The West Yorkshire partners highlight an investment priority in improving the resilience of the SRN against the risk of severe weather. The high Pennine routes

(M62 and A628) are the main east- west routes across the north. The M62 is the route of 'last resort' in winter weather which if closed causes major disruption to the region.

Infrastructure priorities (Initial Report section 5.2)

The West Yorkshire partners would support the combination of replacing assets and extending their current lifecycles with minor upgrades as this would allow Highways England to deal with asset management in a gradual and measured approach – rather than put pressure on resources and operational efficiency of the network.

We welcome that whole life costing will be used as part of the decision making for asset management investment.

A local priorities fund (Initial Report section 5.3.8)

It would be useful to provide details of how many smaller schemes have been implemented through the Local Priorities Fund, their location and nature – nevertheless the West Yorkshire partners welcome the re-establishment of this fund and opportunities for Highways England to support Combined and Local Authorities with provide much-needed congestion relief. We would strongly support a 'single pot' approach to any new funding opportunity. Thus reducing the need for detailed bids to be produced by local/combined authorities.

We see opportunity to build on work already undertaken with local area Highways England Officers to identify and embed local priority schemes in Local Plan Infrastructure delivery planning. The West Yorkshire partners are aware that a lot of good work is undertaken at a local level when assessing the impacts of districts local plan aspirations on the SRN. This work is often carried out by the land use planning section of Highways England but does not appear to always inform the longer-term network planning of the SRN. West Yorkshire would like to seek through the RIS scheme definition process greater links with schemes identified through the land use planning process.

We would also welcome an opportunity for schemes on the West Yorkshire Key Route Network (KRN) to be considered within context of this proposed fund. This is noting the role the KRN plays is supporting connectivity to/from the SRN.

Future studies (Initial Report section 5.3.11)

WYCA would expect TfN to be an equal partner and co-client in the prioritisation scoping and commissioning of future studies in the North.

The free-flow connections at key junctions would be beneficial to the whole network as it would reduce congestion and increase reliability but the improvements also need to be delivered to the Local Road Networks to ensure free flow of traffic after it leaves the SRN.

The integration hubs are essential, and WYCA and partners would be fully support further studies to deliver an efficient and integrated transport network that delivers transformational economic growth for the North and England.

TfN is carrying out an assessment of key routes already via its Strategic Development Corridor studies, with the input of DfT, Highways England, Combined and Local Authorities and other transport providers. The work on the SDC's will put TfN and its partners in a good position to prioritise road investment proposals and TfN's multi-modal assessments will be able to give a long term, strategic and holistic understanding of what is required on the transport network e.g. in some locations railways may deliver a higher level of productivity than the local motorways and expressways. As such, the prioritisation of investments for the SRN may change. (The West Yorkshire partners are looking to both the TfN work and RIS Local Studies to inform the RIS process e.g. Kirklees Council interest in understanding the wider economic benefits of a scheme at Junction 24a on the M62).

Designated funds (Initial Report section 5.4)

The West Yorkshire partners welcome the continuation of Designated Funds and broadly support the proposals for the provision of Designated Funds in the RIS2 period – but clarity is required on the criteria and application of these funds, including the making of collective bids across different funds.

Generally, the West Yorkshire partners believe there needs to be a more flexible approach when looking at the potential for scheme inclusion in all the designated funds and Highways England should be empowered to make decisions without the need for referral/clarification to and from the Department.

The experience of Designated Funds in RIS1 was at times frustrating. The current five Designated Funds generally proved difficult to access/influence and some of these funds feature significant underspend on the part of Highways England. There was a lack of clarity in guidance and consistency in approach to the Funds – for example a formal invitation to LEPs was issued for the Growth and Housing Fund, but this approach was not replicated for the other funds e.g. the Cycling Fund. Furthermore the nature of some of the Funds, involving competitive bidding competitions are time consuming and costly exercises for bidders and do not aid strategic or long term planning. Providing funds on a thematic basis also undermined opportunities for collaborative working and the investigation and delivery of more imaginative, collective approaches that seek to address a number of issues in a location.

Careful thought must be given how Designated Funds are accessed and applied in RIS2 to provide consistency of approach, communication and liaison with stakeholders. Combined and Local Authorities should be recognised as key partners in terms of providing local intelligence on impacts on local communities from the SRN, and opportunities to reduce these, linked to local plans and priorities (e.g. local growth aspirations, local cycling and walking networks etc.) Early engagement with stakeholders including Combined and Local Authorities will help maximise the number of potential schemes identified for consideration. In this respect the approach taken for the Growth and Housing Fund should be replicated, with a formal launch and invitation to collaborate issued, and clear criteria identified. For some funds, for example Connecting Communities, the use of stakeholder workshops might provide the best way to bring together stakeholders representing different groups to identify common issues and solutions.

Delivery of the Designated Funds in RIS1 should be used to inform RIS2, and provide Highways England and stakeholders with examples and case studies of schemes delivered, lessons learnt and any evaluation carried out.

The Growth and Housing Fund is supported in that it should help improve access to the SRN and unlock growth locations. However, from our West Yorkshire experience the scoring mechanism used in RIS1 had an undue focus and weighting in favour of large scale strategic sites (circa 5,000 homes). At the current time the West Yorkshire partners have a number of these sites emerging through the plan making process and they are recognised in our SEP as strategic priorities e.g. North Kirklees Growth Zone, East Leeds Extension, Leeds South Bank and Bradley Park (Kirklees). However, none of these locations met the Fund's criteria for outline/full planning approval and were therefore ineligible. Many of these locations require significant highway interventions to unlock their delivery but they are unlikely to progress to outline or full planning approval without a commitment from public sector partner to support strategic infrastructure delivery, such as highway access. The early (i.e. pre-planning approval) support for highway access should be considered in future iterations of this Fund. A more flexible approach might be taken in RIS2 to demonstrating how a scheme might bring forward potential allocations or just as importantly further improve the operation of the SRN where existing allocations have already been brought forward.

We support the widening of scope for the proposed Wellbeing and Environment and Connecting Communities Funds, and these funds along with the Innovation Fund will be critical to ensure that schemes can go beyond mitigation of impacts towards delivering a step change in quality of environment for communities affected by the presence of the SRN - as such the scale of funding must match the statement of ambition, and to stakeholders' expectations and to create the scale and quality of intervention required. For example the need to address severance caused by the SRN will require significant levels of funding within the Connecting Communities fund in excess for the £100m available within the current Cycling Fund.

We welcome the reports' recognition of the role that all road transport and the SRN has on improving UK air quality. Poor air quality is not simply generated on local authority roads and solely a responsibility devolved to them for appropriate action, and Highways England should support and lead on activities to create cleaner, healthier environments. We endorse the establishment of an air quality monitoring network to monitor air quality, however there needs to be greater consideration of HE's role in improving air quality, especially for urban sections of the SRN which pass through densely populated areas. The Designated Fund offers an important opportunity to mitigate against air quality impacts, but further discussion will be required with Local Authorities to identify the locations of greatest concern. Highways England should use experience and measures gained in the current Fund delivery to inform discussions around mitigation.

Roadside facilities are welcome in potentially providing enhancements to the quality of using the SRN and we welcome the recognition in the Initial Report of the particular need for these facilities experienced by HGV drivers, which is an issue that has been raised through our local liaison with the Freight Transport Association.

Performance measures and targets (Initial Report section 6.3)

The West Yorkshire partners strongly support Highways England taking the opportunity to collaborate with other infrastructure owners and operators. This would enable Highways England to have performance targets that reflect the increasing demand for a better integrated multi-modal transport network.

Having fewer performance measures, that are more relevant to the road users, could provide Highways England with clarification on how to meet and exceed customer expectations.

Clarity is required on how Local Highway Authorities and STBs (e.g. TfN) could influence and monitor the performance measures and targets.

5. Are there any other proposals in the Initial Report that you do not agree with? If so, which ones and what could be done differently?

No response

6. Do you agree with Highways England's assessment of the future needs of the strategic road network? If no, how would you change the assessment?

Accurately understanding future trends is essential to ensure the transport system in the North is future-proofed.

Future needs are shaped by the identification of nine trends across three core areas:

- Demand;
- infrastructure; and
- Vehicles.

The West Yorkshire partners welcome this trend identification and the subsequent "Potential Future Scenarios" section. However the West Yorkshire partners feel there needs to be a better connection between the Department for Transport's Road Traffic Forecasts and growth scenarios, which are well documented, and the work Highways England has carried out. Whilst it is clear how the RIS2 programme is developed using the suite of analytical tools described in the "Highways England's analytical methods to inform our proposals for the second Road Period, there seems to be no firm conclusion drawn from the nine trends identified in the Connecting the country: Planning for the long term document. This is particularly evident in the seemingly lack of supporting evidence in identifying how the Expressway concept has been arrived at, making it seem more of a policy decision than an analytical one.

TfN's multi-modal Northern Transport Demand Model, as part of its Analytical Framework, which incorporates Highways England's regional traffic models, will be indispensable in determining the future trends of movement for the North's residents, businesses, and goods. It will estimate how changes in employment, population and the transport network affect travel patterns across the North and forecast demands on the road and rail networks in 2050, using the findings of the Northern Powerhouse Independent Economic Review.

7. How far does the initial report meet the government's aims of: (Rate 1-7, 1=doesn't meet aim at all, 7= completely meets aim) (described in paragraph 2.3)

- **Economy** **5**
- **Network Capability** **5**
- **Safety** **4**
- **Integration** **3**
- **Environment** **4**

Which aims could Highways England do more to meet and how?

Network Capability

As the Initial Report repeatedly demonstrates there is a growing need for a fully integrated and multi-modal transport network. Whilst TfN, WYCA and its partners support investment in building new roads and improving current roads, we are seeking to revolutionise the rail system of the North, adding capacity and reliability that will allow more people and more goods to be transported by rail rather than road.

The proposed allocation of funding for an MRN can't be restricted simply to roadbuilding schemes. The nature of the routes through town and village centres means that additional capacity can't simply be built in and we need to explore better ways to manage traffic flows either through active traffic management along the routes or perhaps looking at ways to intercept traffic flows earlier and disperse them across a wider choice of emergency diversion routes if the motorway is closed.

For freight, we are also considering ways to maximise use of the North's rail network and also potentially inland waterways (- in West Yorkshire the Aire & Calder Navigation. These investments could have a profound impact on the network capability of the SRN - so we suggest that these potential shifts in transport usage are reflected in Highways England's future forecast of the network capabilities.

More information could have been provided on the approach to innovation applied to network capability and operations. Should for example opportunities to treat modes differently, using policy incentives to influence the journeys so that the SRN road space could be used more efficiently.

Safety

With safety now as the top priority at Highways England the RIS 1, safety improvements have been significant for both road users and Highways England staff and consultants e.g. reducing the accident frequency rate by 27-33%. However, instead of meeting the annual performance target of a 40% reduction of KSIs on the

network by the end of 2020, Highways England noted a 6.1% increase in 2017's KSI numbers. Further clarity is required on how improved safety will be delivered.

Further information on who is more vulnerable on the SRN may provide more focus when providing safety improvements, especially if these improvements target behavioural changes

With the establishment of the Major Road Network, TfN and its partners will be able to support Highways England in their efforts to improve safety in the North by promoting relevant policies and interventions. Through influencing travel behaviours and appropriate safety upgrades, TfN and Highways England can work together to meet the challenge of reducing the number of KSIs in the North.

Integration

The Initial Report could be more explicit on the relationship of the SRN and MRM and the role that strengthened MRN connections (in West Yorkshire, particularly east-west connections) could have on improving access to economic assets and at same time releasing capacity on the SRN (e.g. M62) to improve the reliability for users.

The Initial Report could be more explicit on how the Initial Report will assist multi-modal journeys. A greater focus needs to be given on how the SRN can play its role in providing seamless journeys for citizens, business and freight. This could be links to HS2 or Northern Powerhouse Rail stations, new strategic park and ride sites or other opportunities for interchange.

8. Do you think there should be any change in the roads included in the SRN? If so, which roads would you propose are added to or removed from the SRN, and why?

The SRN will continue to provide an integral link to economic centres, urban areas, international hubs, as well across the borders to Scotland and Wales. TfN's Major Road Network will 'fill the gaps' that will enable the North to achieve transformational economic growth and other benefits as identified in the NPIER.

As evidenced in the Initial Major Roads Report, the SRN consists of mainly north-south connections in the North while there are few high-speed connections from East to West, other than the M62. Is there an over reliance on the M62 to achieve this east west connectivity; a route which is subject to severe weather conditions and significant delays resulting from incidents resulting in major delays on local roads. TfN and its partners are seeking to strengthen these connections with Highways England and local authorities so we can provide the necessary access to the North's economic assets. This could also release further capacity on the SRN such as on the M62, and improve the reliability of the SRN for customers.

Further analysis and consultation would need to be carried out with partners before a fuller answer could be given.

9. Is there anything else we need to consider when making decisions about investment in the SRN? If so, what other factors do you want considered? Please provide links to any published information that you consider relevant.

- The Initial Report could be more explicit on how the Initial Report will assist multi-modal journeys. A greater focus needs to be given on how the SRN can play its role in providing seamless journeys for citizens, business and freight. This could be links to HS2 or Northern Powerhouse Rail stations, new strategic park and ride sites or other opportunities for interchange.
 - There is no recognition of the role that higher speed and improved capacity inter-urban rail transport could play in releasing capacity and improving resilience of the SRN. The modelling work that TfN is currently developing will assist TfN, DfT and HE in identify the cumulative road and rail benefits of Northern Powerhouse Rail and TfN's Long Term Rail Strategy.
 - Addressing key hotspots on the SRN is important - but it is disappointing that packaging of different types of schemes to provide corridor solutions, rather than looking at hotspots in isolation is not recognised with greater priority to unlock and transform the economy. Better corridor connectivity would assist in creating greater agglomeration amongst important economic centres across the North.
 - More needs to be made of the role of transport in the roll-out of high speed digital connectivity, specifically full fibre networks and 5G roll out. DCLG and DCMS are leading a variety of work in this area at the moment, with DCMS funding Network Rail's fibre infrastructure roll out along the TransPennine rail route between Leeds, York and Manchester. Across Leeds City Region three bids were submitted in January to DCMS's Local Full Fibre Networks Challenge Fund to support delivery of fibre infrastructure and associated ducting. One of the bid relates to delivery of fibre-ready ducting along 60km of road within the 660km West Yorkshire Key Route Network (KRN) on the basis that this will provide inter-connectivity with our existing Urban Traffic Control network. The produced fibre network will also provide a framework to support follow on investment in 5G connectivity for transport, economic and community based applications.
 - Within the Leeds City Region conversations have already been held with Network Rail to align our respective fibre programmes and opportunities to provide enhanced digital resilience both locally and nationally. We'd welcome a similar conversation with DfT and Highways England in relation to future investment in the SRN.
 - Do the travel models take the future changes in PT demands into account?
 - If Public Transport and Mobility as a Service demand increases, the SRN travel demand may skew towards freight – would this change the future planning of the SRN? e.g. A stronger focus on connected and autonomous vehicles?
 - Should the impact of Brexit be considered in respect of how it impact on travel demand - is this suitably reflected in the future economic models?
- 10. Does the analytical approach taken (chapter 6 and the strategy document accompanying this consultation) have the right balance between ambition, robustness and proportionality? If no, what do you suggest we do differently?**

Overall, it appears that good progress has been made on the analytical approach since RIS1 portfolio development. Especially, the introduction of economy and output

models are steps in the right direction. A good emphasis has been placed on the importance on analytical assurance and development of tools and processes for modelling and appraisal. There are however some issues listed below which the West Yorkshire partners believe should be considered:

Economy Model

It is encouraging to see alongside welfare benefits, economic impacts of road schemes such as jobs and GVA impacts will be accounted for via a new economy model - however, there needs to be further clarity on several issues.

- It has not been made clear how robust the economy model is, what scrutiny has taken place and what was the outcome, and how the model will be checked in the future to test model forecasts;
- It is unclear how the economy model will be used with Regional Transport Models (RTM). Economic performance has impact on transport demand and it has not been made clear whether there will be feedback loops with RTM demand models to account for change in demand due to economic performance and to develop sensitivity/alternative scenarios and the impacts on such scenarios on demand.
- It is unclear what scenarios will be modelled in economy models. It is also unclear how big shocks such as exiting from the European Union and single market will be explicitly modelled and used in demand forecasting and assessment of economic impact of road schemes;
- It has been suggested that economy model will be able to provide outputs on both economic activity and social welfare – but it is unclear how some of the common elements of GDP and welfare impacts will be untangled. It is also unclear whether the social welfare impacts will be admissible in VfM appraisal;
- It is unclear for what type of schemes economy models can be and will be used. How to define the ‘transformational’ schemes has also not been made clear (e.g. based on value of the scheme or direct impact on housing or businesses etc);
- It is unclear whether the net national impact approach advocated by HMT and DfT will have any bearing on prioritising investments on road schemes. It is of a concern that including economic benefit for ‘transformational schemes’ may unduly benefit schemes in the regions with already better performing economic activities rather than the regions with need for further investments;
- To maintain consistency in appraising economic impact of investing in SRN and local roads, the economy model should be made available for local and regional authorities. It should also be noted that building and maintaining economy model requires significant resource and specialist skills, much of that is not available to most authorities.

Regional Transport Models

- It is unclear how robustly the multi-modal approach of appraisal of solutions to a transport problem will be considered. It has been suggested that RTM has a simple rail model. Given the importance and growing popularity of rail usage, rail

improvements will need to be part of the solution for a transport problem. Significant rail improvements are being considered as part of the Transport for the North's (TfN) portfolio development. It is unclear how planned rail improvements and potential rail schemes as a corridor solution to a transport problem will be appraised and with what level of robustness to have confidence on the optioneering and VfM assessment at optioneering;

- Road journey do not start or end on Strategic Road Network (SRN). It has not been made clear how well RTMs model the local road network and takes account of the potential impact of Highways England's road schemes on such roads. All economic, social and environmental impacts on local roads should also be taken into consideration and clearly presented in the decision making process.
- It is commendable to see approaches are being considered to tackle uncertainties in the forecasting by modelling various scenarios. However, it is unclear how these scenarios were developed, what assumptions have been made and how it will impact on the demand forecasting. Also how robustly change in car ownership trends and the impact of Autonomous Vehicles on trip generation and distribution etc will be modelled is unclear, but this could have a significant impact on forecasting and appraisal;
- How technological advancements such as real time traffic information and advancements in Mobility as a Service offerings will affect modelling travel behaviour is also unclear.
- As RIS2 schemes navigates through the various development phases, the age of data used for RTM development may become outside the recommended guideline. It has not been made clear how RTM, and indeed other modelling and appraisal tools, will be kept up to date in a way that is robust, proportionate and has less risk of external challenge.

Output Model

- It is encouraging to see output models are being developed to better aid appraisal and decision making.
- It has been suggested that national-level environmental models have been developed to better assess environmental impacts. Environmental impacts are more acute for urban areas and it is unclear how robustly the environmental output models will be able to assess the impacts in dense urban areas. It is noted that majority of the SRN is in rural areas.

Consistency

- It is good to see emphasis has been placed on consistency in appraisal - however, one key issue is to have a single Do-Minimum development scenario based on a sound uncertainty log for all schemes to maintain consistency. It has not been made clear whether and how this will be done. Collaboration with planning authorities in development of an uncertainty log is of utmost importance.

Evaluation

- Evaluation is key in developing evidence base on what works and where investments should be prioritised – but despite emphasis on modelling economic impacts and use in appraisal, it has not been made clear how the evaluation will be carried out to ascertain the impact against forecast;
- POPE has a well established method of re-establishing the VfM based on re-forecasting done on observed traffic change at Five Year After evaluation period. RTMs will play a crucial role in this assessment and will provide an assessment on how well RTM has forecasted change, but it is unclear how the economy model will be used to check the validity of a model forecast and how the VfM verdict may have changed as a result.