



Office of Road and Rail
Via email

EEH Business Unit
c/o Buckinghamshire County Council
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Email: highways.monitor@orr.gov.uk

Date: 14/2/2020

Dear Sir/ Madam,

Consultation Response: Holding Highways England to Account

England's Economic Heartland (EEH) is the Sub-national Transport Body (STB) for the region stretching from Swindon across to Cambridgeshire, and Northamptonshire down to Hertfordshire, incorporating the area defined as the Oxford to Cambridge Arc. We provide a single strategic voice on the region's infrastructure and connectivity priorities.

As the Sub National Transport Body for the Heartland area we welcome the opportunity to comment on the ORR's consultation 'Holding Highways England to Account'. EEH's focus is on delivering a user-centred transport system in our region, bringing better outcomes for all users. This is a focus that is shared with ORR in its role as Monitor.

The EEH Strategic Transport Forum is the STB and allows partners to work together with one voice when formulating policy and setting strategic transport priorities for the Heartland region. Highways England is a member of the Forum and EEH enjoys a strong and effective working relationship with the company. EEH welcomes ongoing (and increased) engagement with Highways England in: setting regional priorities, building on existing relationships, utilising local knowledge, and building decisions based on evidence held at a regional level.

In July 2019, EEH published its Outline Transport Strategy. The document provided a framework for engagement from which EEH has gathered a significant amount of evidence. Following analysis of the responses, EEH will publish its draft Transport Strategy (to 2050) in July 2020. The proposed vision for the Transport Strategy is "*to harness the Heartland's globally renowned centres of innovation to unlock a world class transport system that connects people and places within and beyond our region whilst de-carbonising our transport system*".

It is in the context of this vision that EEH sets out its response to the ORR's consultation.

The Strategic Road Network (SRN) plays an important role in the transport system in the Heartland region, supporting economic growth and connecting people and places. It provides

key links between our region and the rest of the UK and provides a vital role in supporting the freight and logistics sector.

From a strategic perspective, in order for the SRN to meet user expectations in the context of the legal targets for the reduction of greenhouse gases adopted by the Government in summer 2019, it is essential that it is developed and managed in a different way. The banning of new petrol and diesel cars from 2035 adds further impetus to the need for change and injects the need for added pace in making that change happen.

The role of the ORR as Monitor of Highways England must hold Highways England to account in ensuring that its approach to investment and maintenance is consistent with the commitment by Government that the UK will meet the net zero greenhouse gas emissions requirement no later than 2050. EEH argues that Sub-national Transport Bodies – with their remit to ensure the future role of the SRN is placed within the wider transport agenda – is to key in helping ORR in this regard.

Role of Sub National Transport Bodies

Since their establishment in the Cities and Local Government Devolution Act 2016, Sub-national Transport Bodies have developed their capacity and capability to have an evidence-led, outcome-focused approach to the development of regional Transport Strategies. EEH is committed to place its STB on a statutory basis, further emphasising the significance of STBs in supporting ORR in its role as Monitor of Highways England.

Successive Secretaries of State (Transport) have reinforced their commitment to Sub-national Transport Bodies. In November 2019, Government stated that where STBs have a strong rationale, broad regional scope and can speak with one voice for the region, the Department for Transport will take account of STB views in developing national transport policy and investment decisions, regardless of statutory status. Given this context STBs should be named as a key stakeholder in the Monitoring process for Highways England.

The ORR should ensure that, in its role as Monitor, it captures and has built in to it the right mechanisms for ensuring that Highways England is required to respond to and deliver the priorities of STBs. To that end, paragraph 3.7 in the ORR consultation document: Holding Highways England to Account should be amended so as to list Sub-national Transport Bodies as strategic stakeholders. The document should be further amended to include a clear mechanism for seeking feedback and reporting on how effective Highways England has been in meeting the priorities identified by STBs.

Supporting the Major Road Network

STBs are established bodies that develop evidence-led strategic guidance on regional policy and infrastructure programming. This has been demonstrated through the role that STBs have in the development of the Major Road Network. Indeed EEH – as all STBs – continue to support the original conclusion of the Rees Jeffrey Road Fund that the Major Road Network should be a combination of Highways England's SRN and the more significant local authority owned roads. This would help achieve the strategic objective of the ORR to *'improve performance and value for money from the strategic road network; securing improved performance, including efficiency, safety and sustainability, from the SRN, for the benefit of road users and the public.'*

EEH worked with Local Authority partners, and used our Regional Evidence Base to develop an agreed MRN 5-year programme for the Heartland region. Work to develop the investment pipeline for 2025 – 2030 has started, and is being developed in alongside the region's Transport Strategy. Moving forward it is important to ensure that the role of the Monitor includes the need



to include consideration of the interaction between Highways England's network and that of the Local Authorities. EEH recommends that this is included within the document 'Holding Highways England to Account'.

Future Proofing the Strategic Road Network

EEH is supportive of ORR's commitment to ensure that Highways England meets all the draft objectives set out for the RIS 2 period, namely; representing all users, supporting housing growth and productivity, safety and maintenance, network strategy and multi modal approach, environmental and air quality and new technology.

The Heartland region is renowned for forward thinking, technology led innovation. Meeting the de-carbonisation target adopted by Government will require significant change at an accelerated pace. This creates an enormous opportunity for the highways sector to demonstrate leadership on what is a key strategic issue for the UK, one where innovation will be an important component.

Future proofing the transport network through rapid and widespread adoption of new and emerging technologies, together with investment in digital infrastructure that is available to users beyond the highway network, need to be critical components of future investment programme. ORR, in its role as Monitor, must ensure that Highways England actively invest in new technologies and facilitate innovation.

Across the sector the level of ambition and expectation amongst users and wider communities when it comes to the de-carbonisation agenda is growing. In response there is a need to harness the opportunities created by innovation, deregulation and new policy directions. STBs collectively are collaborating on their work to develop pathways to de-carbonisation. This will enable them to respond positively to the Department for Transport's De-carbonisation Plan. ORR must be given the responsibility to ensure that Highways England responds positively to the STBs work on de-carbonisation. The de-carbonisation agenda cannot wait for future RIS periods. ORR needs to ensure that Highways England actively responds to changing policy directions and priorities during individual RIS periods.

In addition Highways England has a key role to play in ensuring the wider quality of life for communities is improved. In developing their investment programmes, Highways England need to work with STBs to consider the impacts of their proposals on the wider transport networks and their environmental impacts.

For example, EEH would like to explore further with ORR the role that Highways England has in helping to respond to localised issues around the objective for air quality and environment. The SRN (A5) passes through the market town of Towcester in Northamptonshire. The town is in an Air Quality Management Area (AQMA), designated due to air quality concerns arising from the SRN route. Local Authorities set AQMAs, and have the responsibility for developing and Air Quality Management Plan, however are not responsible for the Strategic Road Network. There is a lack of ownership and accountability within Highways England for the impact that is resulting from their network. ORR's involvement in monitoring HE's performance should be able to address the impact of the SRN on the local environment.

Monitoring and evaluating by the ORR of Highways England's compliance against the objective to support all road users (including active travel, public transport and freight) is essential as we move towards a more tailored people-centred approach to transport planning in the future.

Funding and programme delivery

EEH is keen to ensure certainty of delivery of the RIS programme and therefore support a forward looking approach to identifying and resolving issues, as outlined in the consultation documentation. Targeted investment in roads in the EEH region is critical to ensuring economic growth and ensuring early resolution to issues with the RIS programme will provide confidence to communities and investors.

Equally, certainty around funding for the delivery of the investment plan, in order to provide much needed transport infrastructure, is critical. To this end, EEH is supportive of option 2 (ORR's approach to fining during the RIS2 period) for fines to be paid from management remuneration rather than diverting funding which would otherwise be used to help from operate and maintain the SRN.

England's Economic Heartland would welcome a strategic role which enables us, as a Strategic Stakeholder and in the context of the EEH Regional Transport Strategy to hold Highways England to account, reporting formally to the ORR on how effective the organisation has been in delivering programme delivery and managing the performance of the network across the Heartland region.

England's Economic Heartland welcomes the opportunity to respond to this consultation. The importance of joint working between partners, and ensuring ongoing collaboration with Highways England in setting priorities and ensuring the delivery of future road investment strategies will be key to ultimately delivery an efficient and effective transport system. We welcome ORR's monitoring, evaluation and holding Highways England to account ensure the programme is delivered against the RIS objectives in a timely and cost effective manner.

Yours sincerely



Martin Tugwell
Programme Director