



The Local Government Technical Advisers Group

Contact details:

*Martin Sachs
Hon Secretary to the National
Transport Committee
The Local Government
Technical Advisers Group (TAG)*

20th June 2015

Highwaysmonitor@orr.gsi.gov.uk
Richard Coates,
Head of Highways Monitoring Development
Office of Rail and Road,
3rd Floor,
One Kemble Street,
London W2B 4AN.

Dear Mr. Coates

The Local Government Technical Advisers Group (TAG) response to the Office of Rail and Road “Monitoring Highways England” consultation

1. Introduction and background to TAG

1.1 I am pleased to take this opportunity to respond to your consultation regarding the monitoring of Highways England. As a background, we have submitted responses to Government and given evidence to the House of Commons Transport Select Committee (HOCTC) on various documents published in the preparation of the Government’s intentions to expand the strategic road construction programme and the changed management arrangements. We have previously provided some relevant documents, which primarily related to the programme and wider issues relating to management arrangements. I have also sought to summarise our general views in the following paragraphs prior to addressing your consultation, hopefully this will assist your understanding of our position and views relating to monitoring and accountability.

1.2 TAG represents a large number of local authorities in the country, these include those with highway and transport responsibilities such as Transport for London, most London boroughs, metropolitan authorities, unitary and combined authorities, consultants providing highway and transport services for major local authorities and many of the districts and towns in two tier authorities. While ‘second tier’ authorities do not have direct responsibility for transport, they do have a major role in looking after significant towns and the sensible overall planning of them, including providing a reasonable environment and trying to ensure, through the highways and transport authorities, that the transport system is fit for purpose. Overall we represent over 100 different authorities. We should add that local authorities have the responsibility for managing 97.6% of the total road network and, although between a quarter and a third of all road traffic (in vehicle miles) are reported to be carried on the strategic network, nearly all trips using roads, by whatever mode (including by foot), use the local roads at their beginning and at their end.



The Local Government Technical Advisers Group

1.3 TAG was first created as a joint officer body to coordinate across the various areas of local government and was formed by an amalgamation of the Associations of London Borough Engineers (ALBES), Metropolitan District Engineers (AMDE) and Chief Technical Officers (ACTO) of the districts in two tier areas. One of the major reasons for this combination was so that advice could come from one body. TAG still has a major role in advising the LGA and recent submissions from the LGA on transport issues usually reflect TAG advice.

2. Summary of TAG's views regarding Government's Infrastructure Plans

2.1 It appears to TAG that the government has the firm view that:

- more infrastructure will help the UK economy;
- the reduction of congestion by expansion of the Strategic Road Network is a recognised part of this need to expand the infrastructure;
- long term planning of construction programmes by a 'company' freed from some controls will ensure better delivery of the infrastructure.

2.2 TAG fully accepts that a level of infrastructure of power, communications buildings etc. is necessary for every economy to function. However, before we build any more infrastructure - adding to the maintenance costs - we should ensure our existing infrastructure is maintained adequately to serve the needs of people and businesses. Maintenance of the road network is suffering very badly on much of the 97.6% of the road network through woefully inadequate funding over many years. Similarly public transport for people to reach jobs and essential services is not being properly maintained outside of London and a few other areas.

2.3 TAG agrees that traffic congestion, including for buses and pedestrians, is wasteful and we support any reasonable measures that can be shown to alleviate congestion. The Eddington Report identified that the worst congestion was in urban areas and that road pricing/congestion charging was 'a no brainer' as part of the solution to congestion. (TAG recognises the political difficulties of road pricing, but is concerned that strategies making such solutions more difficult will not help). TAG believes, with evidence, that enlarging the Strategic Road Network anywhere near major cities will in the relatively short term increase traffic levels, congestion, CO2 and pollution levels, especially in urban areas.

2.4 TAG fully understands the benefits of consistent programmes of workload (and would wish a similar stable programme be applied to the other 97.6% of the network). It is however concerned that moving so much responsibility to an arms-length company will reduce the scope elected MPs and other representatives will have to monitor the work of the people involved with managing the best use of our transport infrastructure, or indeed public spending.

2.5 In summary, while the initial objectives of the government's proposals would seem very sensible, proper scrutiny (of the legislation, strategies and programme) are likely to show that the suggested legislation and programme will not deliver what the country really needs. Furthermore it is likely to be damaging to the UK economy and environment and waste large sums of taxpayers' money.

3. Infrastructure to help the economy



The Local Government Technical Advisers Group

3.1 We believe that before spending large sums expanding our infrastructure (and adding further to the long term maintenance costs), we should properly finance basic maintenance of what we have already. With the present shortage of public funds it seems illogical to build significantly more road infrastructure.

3.2 If we wish to improve the transport and communications between people and businesses this can only be really addressed by policies and strategies for whole (end to end) journeys. An integrated transport policy is needed covering all roads and other modes not just the very limited Strategic Road Network. Furthermore planning of development needs to minimise transport requirements.

3.3 It is usually accepted that urban areas are the powerhouse of developed countries' economies. Eddington identified that 89% of traffic congestion is in urban areas. This suggests that transport investment needs to go into such urban areas, but not necessarily for road construction.

3.4 The most important part of the assessment of road schemes has for many years been based on 'calculated' cumulative time savings to travellers between a 'do nothing' or 'do minimum' situation and a situation with a transport scheme. These calculated time savings are then turned into an 'economic benefit', largely based on assumed values of the time savings. TAG and many others in the transport field have been very critical of the methods used in the calculations – two documents, Appendix 1 and 2, explain our criticisms in more detail. Suffice it to say, the methods rely on a large number of assumptions including a 'natural' traffic growth figure. It is also of particular note that when the calculated benefits of road schemes are looked at, it is found that most of the economic benefits appear for car traffic during peak periods and for the period 30-60 years hence. On the former, most areas and particularly urban areas do not want to encourage car commuting; secondly, returns so far in the future for the peak time period are likely to be very arbitrary.

4. Consultation General Commentary

4.1 TAG agrees that the performance of the Strategic Road Network (SRN), and of how it is managed, should be monitored and welcome the role of the Office of Rail and Road (ORR) in this important task of monitoring and enforcing performance of Highways England in the performance of its duties.

4.2 TAG recognises the need for the establishment of an agreed performance framework against which the SRN and Highways England can be measured and recognises the complexity of the task and diversity of both the network and the requirements of users; issues that our member authorities face on a daily basis.

4.3 TAG is concerned that elements of a performance framework such as KPIs may inadvertently become the drivers for service delivery, resulting in unintended or even perverse outcomes. TAG considers that to underpin and increase understanding, reporting of performance monitoring needs to extend beyond measurement of KPIs, for example to include clear textual explanations. Similarly, the diversity of the network warrants visibility of data and information at the local level and appropriate for all classes of user. Local authorities will, for example be keen to understand not only how the SRN is performing at a national level but also at a local level, bearing in mind the importance of the SRN to local economies. Similarly, local authorities will wish to be assured that the safety of all classes of users is being addressed.



The Local Government Technical Advisers Group

4.4 TAG is concerned that enforcement is proportionate and, for example, regarding the Investment Plan would allow that schemes are developed with the full engagement of local authorities and communities, and not curtailed to ensure compliance with an ambitious plan. Deviation from the plan, or for that matter a KPI, particularly perhaps at the local level, is not necessarily the worst potential outcome.

4.5 TAG wishes to ensure that local authorities are directly engaged in the monitoring process (a similar request having already been made regarding Highways England's operations), as much of the activity associated with the operation of the SRN has a direct bearing on the local authorities' operations as highway authorities and their broader duties. Local authorities will be affected by the investment decisions of Highways England and by both decisions to invest and decisions not to do so, as they seek to manage the consequences in their areas.

4.6 The specific allocation of part of Highways England's budget to improve walking and cycling both on the trunk road and for integration between the SRN and other modes is welcomed, although considered only modest given the extent of the network and scale of the challenge. TAG seeks clarification how this specific funding will be allocated and monitored and how a more appropriate funding allocation will be determined for future investment plans.

5. Responses to consultation questions

5.1 Are you clear what our role will involve? Are there aspects of our role which you would like more clarity about?

5.1.1 Yes. Clarity regarding the enforcement role is required, but we understand that this will be covered by a future consultation.

5.2 Do you agree with our strategic objective for our highways monitoring role?

5.2.1 Yes.

5.3 Are there specific ways you would like us to engage with you beyond the industry forums already referred to in this document?

5.3.1 TAG considers that further consideration is required regarding how local authorities are engaged beyond the industry forums already proposed, given the extent to which the operations of Highways England impinge on local authority operations and responsibilities. TAG considers that local authorities should be formal consultees regarding the performance of Highways England, including the metrics used and the levels set.

5.4 Have we identified the key areas that requiring monitoring? Are there particular areas of Highways England's performance and efficiency which you consider require specific focus or an alternative approach?

5.4.1 We wish to make the following comments and observations regarding table 3.2 of the consultation.

Component for	TAG Comment
----------------------	--------------------



The Local Government Technical Advisers Group

monitoring	
General	Provide data and information in disaggregated form appropriate for local authority comment.
Making the Network Safer	Suggest that total numbers of incidents involving injury are identified in addition to KSI, together with travel mode and road type.
Improving User satisfaction	Provide information by user travel mode and road type.
Supporting the smooth flow of traffic	Provide information by road type and effectiveness of winter service operations.
Encouraging economic growth	Provide information by road type.
Delivering better environmental outcomes	Air quality and water quality impacts need to be considered.
Helping cyclists, walkers and vulnerable users of the network.	Needs further consideration regarding how this will be applied across the various road types and locations, including during construction and maintenance operations.
Keeping the network in good condition	Provide information regarding footpaths, footways and cycleways.

5.5 We have set out our initial plans for reporting on Highways England's performance and efficiency. Is there further information

5.5.1 As mentioned above, TAG considers that information relating to performance needs to be provided in a form appropriate for local authority comment and that local authorities should be formally consulted.

5.5.2 Additionally we consider that there is a need for an ombudsman role to address concerns relating to issues, while not necessarily of strategic importance, that would be influential in holding to account Highways England in the resolution of complaints and issues, particularly of members of the public.

5.6 Is there specific information relating to Highways England which is not currently in the public domain which you think should be prioritised for publication?

5.6.1 Nothing specific at this time, however TAG would expect that Highways England should be bound to adopt the principles of 'Open Data' and act as an exemplar in this area.

Yours sincerely

Martin Sachs