

Cabinet Member for Highways and Infrastructure	Ref No: HI29 (17/18)
March 2017	Key Decision: Yes
Response to the Department for Transport's Consultation on the Creation of a Major Road Network	Part I
Report by Executive Director for Economy, Infrastructure and Environment and Head of Planning Services	Electoral Division(s): All

Summary

The County Council is being consulted by the Department for Transport on a proposal to create a new Major Road Network (MRN). The MRN is being proposed to reduce congestion and support economic growth by raising the standard of routes on the MRN. The MRN is expected to complement the current National Strategic Road Network (SRN) and improvements to the MRN will be eligible for funding from the National Roads Fund (NRF). The consultation includes the criteria that will be used to define the network including traffic flows and demographic information.

The SRN will remain unchanged and will continue to be managed by Highways England. Although the MRN in West Sussex will continue to be the responsibility of the County Council, as the Local Highway Authority, it is proposed that Transport for the South East and Highways England will also have a role in the ongoing management of the MRN (for example, through programme management, analysis, cost estimating or support with delivery).

The proposed MRN in West Sussex includes parts of A22, A24, A29, A259, A264, A272, A280, A283, and A286.

The consultation response (Appendix A to this report) includes a list of roads in West Sussex that the County Council, as local highway authority, is seeking to be added or removed from the proposed MRN and the justification for these changes.

Recommendation

That the Cabinet Member for Highways and Infrastructure approves the County Council's consultation response (Appendix A) for submission to the Department for Transport.

1. Background and Context

- 1.1 In December 2017, the Department for Transport (DfT) began consulting on a proposal to create a Major Road Network (MRN) in England. This report sets out the background to the proposal and the County Council's consultation response.

- 1.2 The Strategic Road Network (SRN) is managed by Highways England and is made up of motorways and the most significant 'A' roads. All other roads in England are managed by local and regional authorities. This leads to differences in the way that roads are managed and improved because improvements to the SRN are planned through the national Roads Investment Strategy (RIS) process, whereas local road improvements are planned through the West Sussex Transport Plan and/or local plans.
- 1.3 DfT's consultation document puts forward a proposal to create a network of England's most strategically important local roads that complement the SRN. The proposal is to create a Major Road Network of approximately the same mileage as the current SRN (approximately 4,200 miles). The MRN will elevate the status of some local roads and provide access to the National Roads Fund for improvements with increased certainty of funding as part of a coordinated investment programme.
- 1.4 The Government has five central policy objectives for the MRN: reducing congestion; support economic growth and rebalancing; support housing delivery; support all road users; and support the SRN.
- 1.5 The consultation document seeks views on; defining the network; investment planning; roles and responsibilities; and eligibility and investment assessment criteria.
- 1.6 The County Council's consultation response (Appendix A) will be approved by the Cabinet Member for Highways and Infrastructure and submitted to the Department for Transport. A provisional response was submitted before the consultation closed on 19 March 2018.
- 1.7 The County Council is also working with other Local Authorities and Local Enterprise Partnerships and environmental bodies as part of Transport for the South East (TfSE) (the emerging Sub-national Transport Body), that is also preparing a response to the consultation. The County Council's consultation response has informed TfSE's proposed response.

2. Proposed Major Road Network

- 2.1 The DfT propose to use a set of quantitative and qualitative criteria to identify the roads that should be included in the MRN and they are seeking views on the suitability of these criteria.
- 2.2 The proposed quantitative criteria for defining the MRN network are:
 1. Roads where traffic flow is greater than a defined level; or
 2. Roads where traffic flow is greater than a defined level (but lower than in criterion 1, and in addition, the proportion of HGV/LGVs on that section of road is also greater than a defined level
 3. In both cases traffic flow is measured by the Average Annual Daily Flow (AADF)
- 2.3 At this stage, DfT have not proposed thresholds for use in the quantitative criteria. However, the Rees Jeffery's Roads Fund research study that

proposed the creation of a MRN that largely mirrors the DfT's proposed MRN, applied the following thresholds to define the network:

1. Traffic flow greater than 20,000 vehicles (AADF)
2. Traffic flow greater than 10,000 vehicles (AADF), provided that at least 5% of that flow is Heavy Goods Vehicles (HGVs) or 15% is Light Goods Vehicles (LGVs)

2.4 In addition to the quantitative criteria, the following qualitative criteria are proposed:

- a) ensuring a coherent network by adding links to form continuous sections of road and removing isolated links and those that form part of a corridor where traffic flows generally do not exceed the thresholds
- b) linking economic centres including all towns/cities with a population exceeding 50,000 (except in exceptional circumstances) and all major ports, airports and key transport hubs not already linked by the SRN
- c) access to/resilience for the SRN by providing access to the SRN and alternative route options if one route should experience disruption or require long-term works

2.5 The proposed MRN (shown below in red) includes parts of A22, A24, A29, A259, A264, A272, A280, A283 and A286 in West Sussex.



Management of the MRN

2.6 Roads included in the MRN will continue to be managed by the County Council, as the local highway authority. The SRN will remain unchanged and will continue to be managed by Highways England.

- 2.7 The consultation sets out a proposed process for developing the MRN investment programme. Sub-national Transport Bodies (STBs) such as Transport for the South East will be responsible for developing and updating a Regional Evidence Base with support from Highways England. Local Highway Authorities will promote schemes for inclusion in the Regional Evidence Base that will be assessed and prioritised at a regional level. The DfT will prioritise schemes at a national level and approve business cases.
- 2.8 The DfT propose that, in order to bring more coordinated planning to the SRN and MRN, Highways England will be involved in the MRN programme. This supporting role could include programme management, analysis, cost estimating or support with delivery.
- 2.9 It is proposed that the MRN will be reviewed every five years (in line with RIS). However, this is likely to be a review of the investment programme, rather than a review of the MRN itself.

Funding the MRN

- 2.10 Local authorities will be able to bid for funds for improvement works and schemes such as bypasses, missing links, road widening, major structural renewals, major junction improvements, Intelligent Transport Systems and packages of improvements. Schemes are expected to cost in the range of £20-100m. The inclusion of a specific road in the MRN might help that road to be prioritised for improvements.
- 2.11 The MRN will be improved largely using funding from the National Roads Fund. However, as with existing major transport schemes being delivered through the corporate Capital Programme, there will be a requirement for local contributions towards scheme costs. At this stage, the level of local contribution has not been specified, although it could be in the region of 20% based on previous experience. This could be funded from a range of sources including developer contributions.
- 2.12 The DfT consultation document mentions that maintenance funding for the local road network will be unaffected. However, no additional maintenance funding is proposed. Therefore as the MRN is improved and maintenance liabilities increase, this would need to be funded from existing maintenance budgets.

Proposal

3. Key Issues for West Sussex

- 3.1 Having considered the Government's objectives for the MRN and the quantitative and qualitative criteria for defining the network, a number of key issues for West Sussex have been identified and considered in preparing the consultation response. The proposed response to each key issue is summarised in the section below.

Economic Centres

- 3.2 A number of towns and places that are important to the economy and future economic growth in West Sussex will not be directly connected to the SRN or MRN. It is understood that this is because they are currently too small, so fall below the thresholds outlined in paragraph 2.4 that have been applied at a national level. As it stands, the SRN and the proposed MRN would not directly connect to Burgess Hill or Shoreham Port that both play an important role in the West Sussex economy.

Summary of WSCC response: to request that Burgess Hill and Shoreham Port are recognised as important economic centres.

Resilience of the Network

- 3.3 As the quantitative criteria that have been used to define the network are based on current traffic flows, some routes have been identified because they are used to avoid congestion or disruption on other routes; for example traffic uses A283 to avoid congestion on A27 at Worthing and Lancing. These roads provide alternative route options but have environmental impacts in the areas they pass through. It may be preferable to improve the cause of the problems on the wider network rather than to improve alternative routes.

Summary of WSCC response: to highlight that in general the County Council's preference would be to address the cause of the problem rather than to improve alternative routes.

East-West Movements

- 3.4 The proposed MRN provides a range of alternative routes for north-south movement north of the A27 but there are limited alternative routes identified to facilitate east-west movement. The lack of alternative routes for east-west movement is problematic when incidents such as accidents occur as there are limited alternative routes for traffic to use to avoid congestion. There is a need for alternative routes, particularly to facilitate east-west movement and provide alternatives to routes that are susceptible to incidents.

Summary of WSCC response: to propose a number of additional roads are added to the MRN as outlined in paragraph 4.9.

Environmental Protection/Protected Landscapes

- 3.5 As large areas of West Sussex are designated as part of the National Park or AONBs, many roads on the proposed MRN pass through or close to environmentally designated areas. These roads perform an important role in the functioning of the West Sussex economy and are important to future economic growth, but there are also statutory duties on public bodies to respect these environmental designations.

Summary of WSCC response: to request that it is recognised that MRN improvements will need to respond to environmental designations and characteristics and additional capital funding may be needed to fund improvements in sensitive areas due to environmental impacts.

Funding for Maintenance and Business Cases

- 3.6 Although the assurance that local road funding will be unaffected is welcome, there will be a need for additional funding to fund higher maintenance costs once MRN improvements have been delivered. The cost of preparing business cases for improvements may also be substantial and the funding for business case development is not discussed in the DfT consultation document. Therefore, there is a need for revenue funding to be made available to fund additional maintenance liabilities and business case development costs.

Summary of WSCC response: to request that additional revenue funding is provided for business case development and that a Government commitment to increase maintenance funding as maintenance liabilities are increased following MRN improvements.

4. Defining the MRN

- 4.1 The West Sussex Transport Plan 2011-26 recognises that there are some local authority roads of strategic importance to the operation of the network and the function of the economy. These roads form part of a 'County Strategic Road Network'. This has been the starting point for considering the proposed MRN and suggesting additions and amendments.
- 4.2 To address the key issues outlined in section 3, the following principles have guided the County Council's response. These also respond to the Government's policy objectives for the MRN, as outlined in paragraph 1.4:

Guiding Principle 1: Providing economic connectivity

- 4.3 The most important places for the economy of West Sussex are the largest towns and international gateways as these are a focus for economic activity and will be important for future economic growth, including housing. These are the places that should be connected to the MRN and/or SRN to ensure that goods and people can flow between them to support economic activity.
- 4.4 Based on 2011 resident population for towns, the following towns meet the qualitative criteria in paragraph 2.4; Crawley, Bognor Regis, Horsham, Worthing. Additionally Shoreham would meet the criteria as it forms part Brighton & Hove Built-Up Area. These places should be supplemented by the places in the County that will be a focus for future planned growth on a strategic scale; Burgess Hill, Haywards Heath and Chichester.
- 4.5 There are also two international gateways that would meet the criteria due to current passenger numbers or cargo throughput; Gatwick Airport and Shoreham Port. Shoreham Port has not been identified as a major port in the analysis that underpins the DfT consultation. However, as Shoreham Port is an important gateway for building materials, including marine-dredged aggregates, that serve the south east market with throughput of 2.1mtpa (2016), it is considered to be of regional significance. Therefore it is considered that representations should be made to ensure it recognised and connected to the MRN.

Guiding Principle 2: Providing network resilience

- 4.6 In order to provide network resilience, there is a need for a network of roads that allows different route choices to be made during times of congestion or disruption from incidents (e.g. accidents). Therefore, at locations where congestion or disruption is a regular occurrence, there is a need for a higher density of routes. These may be provided by the MRN or the Local Road Network.
- 4.7 Having considered the proposed MRN, the southern end of the M23/A23 corridor is relatively well served by alternative routes. However, the northern end of the M23/A23 corridor in West Sussex is less well served and there is also an absence of alternative routes to the A27. As the northern end of the M23/A23 corridor and A27 corridor throughout West Sussex are subject to regular congestion and disruption, it is considered that a higher density of routes would be welcome in these areas to provide network resilience.

Guiding Principle 3: Protecting the environment

- 4.8 Environmental designations or characteristics should not preclude the inclusion of roads in the MRN but they should influence the design of improvements; for example by requiring greater environmental mitigation measures. Where adverse environmental impacts occur, both within or outside designated areas, they should ideally be in less sensitive locations when considered across the area as a whole.

County Council's Suggested Changes to the Proposed MRN

- 4.9 The following amendments to the proposed MRN are identified in the consultation response in Appendix A. A plan showing how the suggested changes would affect the MRN is included in Appendix B.

Table 1: County Council's Suggested Changes to the Proposed MRN		
Road	Proposed Change	Justification
A286 between A27 Chichester and Birdham	Remove from the MRN	Traffic flow (AADF) is less than 20,000 vehicles; and proportion of HGVs is less than 5%; and proportion of LGVs less than 15% This is an important seasonal route (for visitors) but does not provide connectivity between major towns or international gateways
A259 between Bersted and A2032 'Goring Crossways' junction at Worthing	Add to the MRN	Traffic flow (AADF) varies along its length but is generally between 20,000-30,000 Provides an alternative to A27 congestion and safety hotspots

A2032 between 'Goring Crossways' junction and A24	Add to the MRN	<p>Traffic flow (AADF) generally exceeds 25,000</p> <p>Provides an alternative to A27 congestion and safety hotspots</p>
A24 between A27 'Grove Lodge' junction and A259 North Street, Worthing	Add to the MRN	<p>Traffic flow (AADF) generally exceeds 20,000</p> <p>Provides an alternative to A27 congestion and safety hotspots</p>
A259 between North Street, Worthing and County boundary (Brighton & Hove)	Add to the MRN	<p>Traffic flow (AADF) generally exceeds 25,000 in places</p> <p>Provides an alternative to A27 congestion and safety hotspots</p>
A281 between Five Oaks Road and County boundary (Surrey)	Add to the MRN	<p>Traffic flow (AADF) generally exceeds 10,000 and proportion of HGVs exceeds 5%</p> <p>Provides an alternative to M25 for journeys between Crawley/Horsham and Surrey/Thames Valley</p>
A264 between A24 'High Woods' junction and A29 'Five Oaks' junction	Add to the MRN	<p>Provides connectivity between A24, A29 and A281 in the area west of Horsham to ensure a continuous network</p>
Five Oaks Rd between A281 and A264	Add to the MRN	<p>Provides connectivity between A264 and A281 in the area west of Horsham to ensure a continuous network</p>
A2300 between A23 'Hickstead' junction and Jane Murray Way	Add to the MRN	<p>Traffic flow (AADF) is marginally below 20,000 and LGVs exceed 15%</p> <p>Burgess Hill is a strategic growth location with over 4000 new homes and employment development planned</p>
A273 between A2300 and A272	Add to the MRN	<p>Traffic flow (AADF) is over 10,000</p> <p>This route is needed to provide a continuous network by linking A272 and A2300</p> <p>Burgess Hill is a strategic growth location with over 4000 new homes and employment development planned</p>

A23 between M23 J11 Pease Pottage junction and County boundary (Surrey)	Add to the MRN	<p>Traffic flow (AADF) varies along its length but is between 20,000-30,000</p> <p>Provides an alternative to M23</p> <p>Provides access to Gatwick Airport and Manor Royal Industrial Estate which is a regionally significant employment location where strategic growth is planned</p> <p>Crawley is a strategic growth location with two new neighbourhoods under construction</p>
A2011 between 'Tushmore' junction and M23 J10	Add to the MRN	<p>Traffic flow (AADF) varies but exceeds 40,000 in places</p> <p>Provides an alternative to M23</p> <p>Provides access to Manor Royal Industrial Estate which is a regionally significant employment location where strategic growth is planned</p> <p>Crawley is a strategic growth location with two new neighbourhoods under construction</p>
A2220 between A23 'Cheals' junction and A264	Add to the MRN	<p>Traffic flow (AADF) exceeds 22,000</p> <p>Provides an alternative to M23</p> <p>Provides access to Manor Royal Industrial Estate which is a regionally significant employment location where strategic growth is planned</p> <p>Crawley is a strategic growth location with two new neighbourhoods under construction</p>
A284 between A259 'Wick' junction and A27 'Crossbush' junction	Add to MRN	<p>Traffic flow (AADF) is currently 14,000 vehicles but the proportion of HGVs exceeds 5%. This route is also planned to be improved through the A284 Lymminster Bypass and once open to traffic, flows are expected to exceed 20,000 vehicles.</p> <p>Provides an alternative to A27 congestion and safety hotspots</p>
A29 Bognor Regis to A27 'Fontwell' junction	Add to MRN	<p>Traffic flow (AADF) exceeds 28,000</p> <p>Provides an alternative to A27 congestion and safety hotspots</p> <p>Provides access to Bognor Regis where strategic growth is planned</p>

Other Roads Considered

- 4.10 The A272 between A24 'Buck Barn' junction and County boundary (Hampshire) was considered as a potential suggested amendment to the MRN as it links the A24 to Petersfield. However, traffic flows on the section of A272 west of A24 are below 10,000 vehicles and the proportion of HGVs only exceeds 5% on a short section close to the County boundary. The inclusion of this section of A272 is not supported by Hampshire County Council or South Downs National Park Authority. For these reasons, it is not proposed as a suggested amendment to the MRN.
- 4.11 The A286 between Chichester and Midhurst was considered as a potential suggested amendment to the MRN as it links to Midhurst. However traffic flows are well below the thresholds in paragraph 2.3. For this reason, it is not proposed as a suggested amendment to the MRN.
- 4.12 The A283 between Shoreham flyover and Shoreham High Street was considered as a potential suggested amendment to the MRN as it links A259 to the A27. However, traffic flows are generally less than 14,000 vehicles and the proportion of HGVs and LGVs is also below the thresholds in paragraph 2.3. Although this route would provide a route between A259 and A27, the preferred route for Shoreham Port related traffic is via A293 in Brighton and Hove. Including the A283 within the MRN could encourage Port-related traffic to use the route instead of the A293. For these reasons, it is not proposed as a suggested amendment to the MRN.
- 4.13 The A280 between A27 Clapham and A259 was considered as a potential suggested amendment to the MRN. However, traffic flows on A280 are expected to reduce following the opening of the A284 Lyminster Bypass in the coming years. Therefore, it has been suggested that the A284 is added to the MRN instead of the A280.

5. Recommendation

The Cabinet Member for Highway and Infrastructure approves the consultation response (Appendix A) for submission to the Department for Transport.

6. Consultation

- 6.1 County Councillors were invited to provide suggestions on the proposed MRN and the following suggestions were received:
- Cllr David Broadford responded stating that routes identified in on the MRN must be fit for purpose. This will be a key consideration in the identification of improvements to the MRN as part of a future programme of investment.
 - Cllr Simon Oakley questioned whether congestion was used as one of the criteria for selecting routes for inclusion in the MRN. The criteria are listed in paragraphs 2.2-2.4. Congestion will be one of the considerations taken into account when improvements to the MRN are identified and prioritised as part of a future programme of investment. Cllr Oakley also expressed support for improving the SRN rather than routes that are used

as diversions. This point is addressed in paragraph 3.3 of the report and in the consultation response (Appendix A - see response to question 5). Cllr Oakley also questioned why the A29 between A27 and A259 was not proposed as part of the MRN. This is suggested by the County Council in Table 1 as an amendment to the MRN.

- Cllr Oakley also requested that the A285 Westhampnett Road between A27 'Portfield' junction and Spitalfield Lane should be included on the MRN to facilitate development to the east of Chichester. This is not suggested in Table 1 as the County Council is currently working with local stakeholders as part of the 'Build A Better A27' project to determine preferred solutions to the issues on the A27 at Chichester. The project is exploring a wide range of options and it would be premature to request that the A285 Westhampnett Road is included in the MRN before this project has reached its final conclusions, as this may be inconsistent with the conclusions of the project. However, this matter could be reconsidered as part of a future review of the MRN, if improving the A285 Westhampnett Road forms part of a solution to the issues on A27 at Chichester that is supported by local stakeholders.

- 6.2 The local planning authorities in West Sussex were invited to submit comments to the County Council on the proposed MRN and the roads that the County Council is suggesting in the consultation response should be added or removed from the MRN.
- 6.3 Horsham District Council (HDC) support the proposed inclusion of parts of A264 and A272 as, in addition to other roads proposed for inclusion in the MRN, this will support planned development north of Horsham and at Southwater. HDC have also confirmed that they have no objection to the A281 being included in the MRN between Broadbridge Heath and Surrey.
- 6.4 Arun District Council (ADC) support the proposed inclusion of the A259 between Chichester and Bognor Regis. ADC have requested that the following roads are also additionally be included; A284 between A259 and A27, A29 between A259 and A27, A259 between Bersted and Worthing. ADC have also requested that the criteria for selecting roads for inclusion in MRN should take account of future development and place greater weight on providing access to/resilience for the SRN.
- 6.5 Chichester District Council (CDC) support the proposed MRN and the suggestion that the A286 between A27 Chichester and Birdham is removed from the proposed MRN, as this is not needed to deliver the Chichester District Local Plan and could be reviewed in future if the situation changes.
- 6.6 Crawley Borough Council (CBC) support the proposed MRN and the suggested amendments in Crawley Borough listed in Table 1. These suggested amendments will support planned growth in Crawley, including the creation of two new neighbourhoods and access to Gatwick Airport and Manor Royal Industrial Estate which are important employment sites in the town.
- 6.7 Mid Sussex District Council (MSDC) support the suggestion that A2300 between A23 'Hickstead' junction and Burgess Hill should be included in the

MRN. Additionally, MSDC have requested that A273 between A2300 and A272 should also be included in the MRN to support planned development of 3,500 new homes to the north of Burgess Hill. The County Council have reviewed current traffic patterns on A273. Although traffic flows on this route are currently well below the quantitative criteria listed in paragraph 2.3, this route would help to make the network continuous by providing a link between A272 and A2300. Therefore, it has been included in Table 1 as a requested change to the MRN.

- 6.8 Worthing and Adur Councils (WAC) support the suggested changes to the MRN listed in Table 1.
- 6.9 Coast to Capital LEP have been involved in the preparation of the consultation response by TfSE and supports the proposed changes set out in the TfSE response which broadly align with the County Council's suggested amendments in Table 1.
- 6.10 The TfSE consultation response recommends that a graduated approach is taken to the application of the qualitative criteria. The consultation response requests that revenue funding be provided for local authorities to develop business cases and maintain the improved MRN. The consultation response states that the SRN in the south east is much shorter and busier than other parts of England and recommends that a number of roads are added to the network, including most of the suggestions identified in Table 1. In some cases, the suggestions made by TfSE are slightly different to those identified in Table 1 because the TfSE response will be approved before the County Council response. Where differences occur, the reasons for these differences will be highlighted in the County Council's consultation response.
- 6.11 A draft consultation response was considered by the Environment, Community, and Fire Select Committee at its meeting on 16 March 2018. The Committee resolved to support the roads that were proposed for inclusion in the MRN and the draft consultation response, taking into account the following comments:
- support any improvement to the road network but recognise the need to ensure the proposed MRN does not create any additional financial burden on the County Council.
 - support the suggested amendments to the MRN route, recognising the importance of including an alternative east-west coastal route.
 - highlight the lack of resilience for the A27 from the Bognor Roundabout to the Hampshire boarder in the current proposals, and recognise the consultation response as an opportunity to highlight the lack of an alternative route round Chichester.
 - recognise the issues of air quality around Cowfold and support a review of the inclusion of this area in the MRN.
 - support a representation to DfT to include criteria for MRN for short stretches of road whose vehicle movements impact on the Strategic Road Network.
- 6.12 The Cabinet Member for Highways and Infrastructure made the following response to the Committee's comments:

- the draft response identifies the need for the DfT to address the need for funding to be made available for business case development and to address any increased maintenance liabilities that result from improvements to the MRN.
- support for the County Council's suggested changes is welcomed.
- a reference has been added to the consultation response to highlight concerns about the resilience of the proposed MRN at Chichester and heading west to the Hampshire border (because there are no alternatives to the A27). A reference has also been added in the response to the work of the 'Build A Better A27' project and the need for the DfT to give a commitment to reviewing the MRN in the Chichester area 'as and when' a preferred option for the A27 at Chichester is identified and taken forward for delivery by Highways England.
- it is recognised that an Air Quality Management Area has been designated at Cowfold to address poor air quality. However, the A272 between the A24 (at Buck Barn) and the A23 is part of the County Council's strategic road network (as identified in the Local Transport Plan 2011-2026) and it forms part of the advisory lorry route for the County. Furthermore, traffic flows on the A272 through Cowfold are high (c 18,000 Annual Average Daily Trips) and the number of HGVs and LGVs are near to the 5% and 15% quantitative thresholds. Therefore, it is considered that the inclusion of the A272 in the MRN is appropriate. However, the County Council will continue to work with key partners to address air quality issues in the village.
- it is recognised that there will be parts of the local road network that link to the SRN and that are impacted by it (and that impact on the SRN). However, it is important to recognise that a DfT qualitative criterion (which is supported by the County Council) is to recreate an MRN that is consistent and coherent. This means that the DfT is only looking to add links that join up stretches of road (that meet the thresholds) to form continuous sections of road and that it is looking to remove (not add) isolated links. Therefore, it is not considered that it would be appropriate to make the suggested representation to the DfT.

7. Resources

There are no additional resource implications associated with preparing the consultation response. Although there may be future financial implications associated with developing improvements to the MRN, they will be subject to separate decisions through the governance on the Capital Programme.

8. Risk Management Implications

There are no identifiable risks to the Council in making this response.

9. Other Options Considered

Not applicable as the County Council is responding to a consultation by the DfT.

10. Equality Duty

An Equality Impact Report is not required for this decision as it is a response to a consultation by an external organisation.

11. Social Value

Not applicable as the County Council is responding to a consultation by the DfT.

12. Crime and Disorder Implications

There are no identifiable Crime and Disorder Act implications in making this response.

13. Human Rights Implications

There are no identifiable Human Rights Act implications in making this consultation response.

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Appendices

A: Consultation Response

B: MRN incorporating the County Council's suggested changes

Background Papers

None

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