



**Surrey Heath Borough  
Council**  
Surrey Heath House  
Knoll Road  
Camberley  
Surrey GU15 3HD  
01276 707100  
DX: 32722 Camberley  
[www.surreyheath.gov.uk](http://www.surreyheath.gov.uk)

**Service** Regulatory  
**Our Ref:**  
**Your Ref:**  
**Direct Tel:**  
**Email:**

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MRN Consultation  
Department for Transport  
2/15 Great Minster House  
33 Horseferry Road  
London  
SW1P 4DR

Dear Sir/Madam,

**Surrey Heath Borough Council's response to the Proposals for the Creation of a Major Road Network consultation.**

Thank you for the opportunity to comment on the Proposals for the Creation of a Major Road Network consultation. This letter is the Council's formal response.

The Council welcomes proposals for the creation a Major Road Network (MRN) and the specific new funding scheme. The Council notes that the new MRN funding could potentially assist a number of roads in the Borough. Surrey Heath Borough Council has an excellent record for attaining funding for infrastructure, and welcomes the opportunity to access funding for significant improvements to major roads within the Borough.

The Council welcomes the six core principles outlined within the consultation document, noting the importance placed upon creating a consistent network with a coordinated investment programme that brings about improvements in standards and performance across the network.

The Council generally welcomes the proposed criteria for defining the MRN network. However, the Council raises concerns with regard to the quantitative criteria used to identify the initial set of roads to be considered for inclusion in the network. Specifically, the use of Average Annual Daily Flow (AADF) may not adequately reflect longer term trends in traffic flows on local 'A' roads. For example, AADF may be skewed by road works which significantly alter traffic patterns on local road networks. In Surrey Heath, the M3 Smart Motorway and the associated road works significantly impacted traffic patterns on roads within the Borough in recent years. Therefore, taking a snap shot of AADF over a one year period is unlikely to be representative of longer term traffic patterns. As such, the Council considers it appropriate to base the quantitative criteria on a five year average of AADF to better reflect traffic conditions and account for extraneous variables such as road works. This would align with proposals to review the MRN every five years. Moreover, it is considered appropriate to review this data every five years, rather than two years suggested in the proposals.

The Council notes the inclusion of the A319 in the indicative MRN provided as part of the consultation. One of the proposed Core Principles of the MRN is to strengthen links between the MRN and the Strategic Road Network (SRN). Therefore, the Council does not consider it appropriate for the A319 to be included in the MRN. This is because the road passes directly through Chobham High Street where the roads width is restricted by listed buildings and a 7.5 tonne weight restriction exists. As such, the road is not suitable for large vehicles and options to increase capacity are very limited. Consequently, the Council notes that criteria used to define the MRN will need to give consideration to local specificities such as these. The Council is surprised that the A30 has not been included in the indicative MRN, constituting a significant arterial route in the Borough, but without having access to the data used to identify the indicative MRN, it is difficult to comment any further.

With regard to investment planning, the Department of Transport will need to clarify details surrounding Regional Evidence Bases (REBs) before proposals are implemented. Specifically clarity is required on how regional groups will be formed, how responsibilities for developing REBs will be distributed within regional groups, the time frame in which REBs will need to be developed and not only how, but by whom REBs will be presented to the Department for Transport for consideration. Surrey Heath would expect that the REB process will be an efficient one that stands the test of local authority Plan periods. Moreover, it is expected that the process will not be burdensome for local authorities, constituting additional work within current capacity constraints.

It is noted that the regional groups may not cover the entirety of individual roads identified within the MRN. Clarification is therefore sought on how this would be approached to ensure that strategic objectives are not compromised. If improvements to individual roads are not treated holistically, congestion may simply be relocated to another point on a road, rather than relieving congestion and associated issues along a roads entirety.

The Council generally welcomes the funding thresholds outlined in the document. However, the Council suggests that the thresholds are reviewed when the MRN is reviewed every five years to account for inflation. It is noted that proposals include the requirement, where works are delivered by local authorities, for local contributions towards the final cost of the scheme. The Council seeks clarification on what this contribution would constitute, and how this contribution would be distributed across regional groups.

The Council generally agrees with the MRN Eligibility and Investment Assessment outlined in the document. The Council agrees with the list of schemes that would be eligible for funding, and recognises that this will ring-fence funding for major improvements to roads defined as part of MRN. However, the Council seeks clarification on how proposals will be assessed against the criteria, for example how many criterion would a proposal need to satisfy in order to attain funding, as well as the weight that would be placed on each criterion during investment assessments.

Surrey Heath Borough Council will continue to engage with proposals and studies which aim to improve standards and performance across the road network.

Yours faithfully,

Jane Ireland  
Planning Policy Manager  
Surrey Heath Borough Council