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Dear Richard

Please find attached a response on behalf of the Liverpool City Region Combined Authority to the ORR consultation exercise on Monitoring Highways England.

If you would like to discuss any of the issues raised in this response please contact:

Mick Noone  
Operational Director – Policy, Planning and Transportation  
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Yours sincerely

A handwritten signature in black ink, appearing to read "David Brown", with a long horizontal flourish extending to the right.

David Brown  
**Chief Executive & Director General, Merseytravel**

## **Office of Road and Rail – Monitoring Highways England**

### **Consultation Response of the Liverpool City Region Combined Authority**

#### **The following comments and questions are offered for consideration:**

1. Monitoring Highways England should encourage more integration and partnership working between it and Local Highway Authorities. This should result in better and more efficient delivery of projects as well as use of funding.
2. Highways England should share data with Local Highway Authorities so as to avoid duplication of data collection and enable more efficient working.
3. Transport for the North is an obvious area where joint working between Combined Authorities, transport authorities, local highway authorities and Highways England can improve the setting of future priorities in the context of an integrated and sustainable transport system. By joining up the priorities of these different organisations, a clear integrated strategy can be put forward and result in more efficient delivery and use of funds. The Strategic Road Network is just one element of the integrated transport system and so the Roads Investment Strategy and Strategic Business Plan must reflect this wider context. For example, a problem on the highway network could be solved with a solution on these highways but in some cases the solution could involve a package on the wider transport network such as rail etc. rather than just a highway solution.
4. Although the ORR only has remit over Highways England, it needs to ensure adequate cross border integration between the various strategies for highways encompassing not just Highways England but also linkages, joint working and data sharing with the devolved administrations in Wales and Scotland particularly. There has to be some means of cross border liaison by ORR with the Welsh Government and Scottish Government who have remit over the strategic highway networks in those areas. Cross border issues between Liverpool City Region, West Cheshire and into North Wales are particularly relevant to us in the Liverpool City Region.
5. Investment plans should also take into account linkages with local highway authorities, transport authorities and devolved administrations (Wales and Scotland) to ensure adequate integration.
6. The ORR's stated objective is to 'Secure improved performance and value for money from the SRN'. This obviously fits with its overall monitoring role but it would be interesting to know to what extent, if any, will it expect to influence the HE's programme of works if, for example, stakeholders (through Transport Focus or otherwise) feel that additions or amendments to this programme are necessary.

7. Not necessarily one for the ORR but it is likely that there will be resource issues for the HE in meeting the monitoring and reporting requirements of the ORR. It would be interesting to know how these are going to be met, bearing in mind the HE is already facing challenges in some areas, and whether the ORR is going to allow any kind of period of grace to allow HE to get up to speed.
8. Clarity is sought on how the ORR intend monitoring the actual works being undertaken by HE, especially at the interface with local authority highways. For example, what, if anything, would it expect to do about poor traffic management (incorrect road markings, poor signing etc.) and delays in HE works?
9. In Table 3.2 (P. 25) it refers to the HE's Biodiversity Action Plan and how the HE must report annually on how it has delivered.... 'to reduce net biodiversity loss...' and yet the KPI is about improving biodiversity. Should the target not just be about arresting biodiversity loss but about improving it as well?
10. How would the ORR expect to arrive at a target for the KPI for the number of new and upgraded crossings? It is felt that this will depend on exactly the type and number of schemes the HE is to deliver every year. Is it the intention to review the programme prior to its commencement and then define how many facilities are to be provided?
11. In terms of the role of Transport Focus, it needs to be clarified whether this will involve direct contact with Local Highway Authorities.
12. In response to Q.3 P. 36, which asks if there are specific ways we would like the ORR to engage with us as highway authorities, is it their intention to consult directly with those HA's that have SRN within their boundaries?
13. In response to Q.4 P. 36 which asks if there are particular areas of HE's performance and efficiency we would the ORR to focus on, for local highway authorities it is important that the HE responds promptly to requests for action, in making decisions on what works may be needed, and in dealing with complaints about poor traffic management at its work sites. Could the ORR influence these aspects of work?
14. In response to Q.5 which asks if there is a need for further information, would there be any benefit in the ORR reviewing the KPIs of individual projects to ensure that the HE is operating efficiently and safely at this level e.g. could it review its H&S stats which demonstrate that safe working practices are being upheld or that stakeholder engagement is what it should be or would it deem these are matters purely for the HE to manage?
15. In 6.6 (P.57) which deals with Enforcement, more information would be helpful. For example, does the ORR have any idea what level of fines will be imposed? Where would it expect the HE to find this money from, would it

mean that less works are done as a result? What would the ORR do with the fines once received?

16. In terms of what information may not be publically available at this stage (Q.6 P. 63) this may be premature as the HE may be working on putting things out there but are the necessary organograms and contact numbers readily available to those who will need them including at an individual scheme level?
17. In terms of what the ORR propose as its initial work plan, can it confirm what its intentions are with respect to rolling out any lessons learnt or for information sharing with local highway authorities so that they too can realise any efficiencies that may become apparent as the ORR's work progresses? Would this be done through the likes of HMEP or separately?