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18 June 2015

Richard Coates
Head of Highways Monitor Development
Office of Rail and Road
3rd Floor
One Kemble Street
LONDON
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Dear Richard,

MONITORING HIGHWAYS ENGLAND CONSULTATION

Thank you for the invitation to respond to your consultation document. I am attaching the Foundation's responses.

I believe action is in hand to arrange an early meeting for us with Stephen Glaister and Peter Antolik, where we can expand as necessary on our response.

The RAC Foundation is an independent think-tank looking at motoring and road use. We commission, conduct and publish authoritative research with the aim of illuminating and informing debate about road transport. Our particular focus is on the value of mobility, for individuals and the economy, the associated importance of safety, affordability, and environmental sensitivity, and on promoting the interest of the responsible motorist.

We are happy for our response to be published.

Yours sincerely,

Steve

Steve Gooding

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Q1 We would say that your role as described is clear, but is necessarily evolving, as it is for Highways England, and for that matter Transport Focus and the DfT. All parties in this new framework need to adopt a common-sense approach to the issues that will inevitably emerge as the organisations mature and a track record starts to emerge. It is more important that the focus stays on the purpose of establishing the new framework – a better strategic road network and a better service for road users – than on the precise wording of the documents, such as Highways England’s licence which could well warrant refinement over time.

Q2 The proposed objectives appear to be in line with the Monitor's statutory purposes, but if we were to add anything at this stage it would be the words "and demonstrate" i.e. it should be a very clear part of ORR's mission to ensure that the emerging picture on performance and efficiency is made comprehensible to the public. This will be key to achieving genuine accountability. See also our response to Q5 below.

Q3 We regard the new stakeholder engagement arrangements to be very much in their infancy. Whilst there is a risk of a proliferation of sounding boards being established by each of the players in the new framework, it is not clear exactly how ORR as Monitor will ensure it is suitably and directly well-informed. The Foundation would welcome an ongoing dialogue with ORR both to help shape the new arrangements and to provide an informed, independent perspective.

Q4 We consider the tight focus on financial and investment efficiency to be right at the outset, given the massive scaling-up in planned investment. One thing we would counsel you to guard against, though, is an over-focus on annual, year-by-year performance, rather than performance over the Roads Period. Government might be concerned about exercising tight annual spending controls, but motorists will be more concerned about the efficient delivery of the performance outcome. ORR’s antennae will need to be attuned to this potential tension.

We are also conscious that a different approach is likely to be warranted to measure and track performance on activities that are established and perhaps changing in scale or approach (e.g. commissioning carriageway maintenance), and those which are genuinely new and novel for all concerned (e.g. spending from the new discretionary funds).

On the issue of reporting generally, we think it will help everyone if it were possible to provide time series and trend data, which might involve some estimation and back-casting (see Q5, below).

An issue that ORR will be familiar with from the railway is the challenge of making targets and monitoring data series that are set at a national level meaningful to road users who will naturally tend to judge performance from the specific trips that they make. We hope that ORR will be engaging with the data science community to explore innovative approaches here.

Q5 With so much information in play ORR has an important role in helping the public understand what is happening through the development of readily comprehensible indices, visualisations etc (whether by Highways England or directly). ORR should seek to maximise awareness of the data sets being published and actively encourage independent developers to explore new approaches; all data should be published in accordance with the Government Digital Service open data standards to allow for maximum re-use.

We would like ORR to explore what can be achieved through back-casting to make an early start on establishing trend data. This would potentially have far greater value than measurement from

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a point value, and is likely to be important in informing decisions on the shape and obligations for Roads Period 2 and beyond.

Q6 Motorists and other road users will be particularly interested in information about the roads they use, not just the network in aggregate. In particular, we would hope to see specific reporting, taking account of our points above about innovative visualisation, in respect of:

- incident causation and duration – where we would also like to see routine publication of post incident evaluation reports for incidents above a certain threshold that capture what happened and what lessons there are to be learned;
- road works – duration, overruns and traffic flow. With the scale of resurfacing that Highways England is set to commission motorists will be seeking evidence that the management and timing of works is consistent with minimising the impact on journey times; and
- information – the quality of Highways England’s approach to informing its road user customers is important in itself. We expect to see Highways England developing more innovative approaches, taking advantage of technological developments e.g. in satellite navigation systems, and providing a more holistic picture, recognising that the vast majority of its customers begin and end their journeys on the local road network.

RAC Foundation

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