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16 June 2015

Dear Richard

Monitoring Highways England - first consultation document

Transport Focus is the independent consumer watchdog representing users of trains in Great Britain; of buses, coaches and trams on scheduled services in England outside London; and all users of the strategic road network managed by Highways England. The latter responsibility will involve us developing a survey of road user satisfaction which the Office of Rail and Road will use in its monitoring activity.

We welcome the opportunity to comment on this consultation. Noting that you will be consulting separately on your enforcement policy, we have refrained from commenting on this aspect. We are also conscious of touching on many of the issues raised in the document in our ongoing discussions. Therefore we have limited our response to the broader, high-level themes.

Q1. Are you clear what our role will involve? Are there aspects of our role which you would like more clarity about?

One of the key issues in establishing a new function is in establishing clarity of roles. Awareness of who is doing what is essential, not only to avoid unnecessary duplication but also to identify any gaps in processes and requirements.

We believe ORR's consultation provides a clear, easily understandable statement of ORR's role and intended approach. Moreover, it does this in the context of the other organisations involved in the process rather than taking a stand-alone view of ORR's function. Setting out the relationship with the Department for Transport (DfT) and Highways England (HE) and ourselves is very helpful.

The section looking at the interface with ORR's rail role is also interesting (para 3.9-3.13). Our own initial investigations as the road user 'watchdog' suggest that there are parallels/comparisons that can be developed for the benefit of both sectors.

While Scotland and Wales are outside ORR's remit (para 3.12d) it would be useful to see the document include a little more about how ORR intends to liaise/link with both

these countries. We would presume there would be some interaction, even if only to aid benchmarking and the sharing of the data.

Likewise for local roads. While ORR has a limited remit, virtually all journeys on the strategic road network will start and end on local roads; and road users' views and experiences will be influenced by this interaction. For instance, in the ease of joining motorways or in the operation of diversionary routes in the event of delays. So it would be helpful to get a feel for how ORR intends to manage and develop the interface with local highway authorities.

Q2. Do you agree with our strategic objective for our highways monitoring role?

Yes.

We are pleased to see the emphasis placed on the end-user in the document. In particular paragraph 4.3 which states: "We will consider those aspects of Highways England's performance that are of greatest importance to users and those that are affected by the SRN when prioritising our monitoring and enforcement activities. When we review Highways England's plans for future delivery we will consider the extent to which it has sought and responded to the views of road users and those affected by the SRN, and our advice to the Secretary of State on future RISs will consider stakeholder priorities."

You will be aware that Transport Focus has already begun research looking at identifying users priorities for improvement. This combined with user satisfaction data will give a powerful indication of what users want. [NB. this research focuses on the views of motorised users – cars, vans, motorcycles and HGVs. We will investigate the views of non-motorised users in separate work].

Q3. Are there specific ways you would like us to engage with you beyond the industry forums already referred to in this document?

Transport Focus and ORR have already developed close and effective working arrangements. We look forward to building upon these in the coming months and years.

Q4. Have we identified the key areas that require monitoring? Are there particular areas of Highways England's performance and efficiency which you consider require specific focus or an alternative monitoring approach?

Q5. We have set out our initial plans for reporting on Highways England's performance and efficiency. Is there further information or analysis that you think we should produce?

Q6. Is there specific information relating to Highways England which is not currently in the public domain which you think should be prioritised for publication?

We will take these questions in one go. We agree with the statement in paragraph 5.1 about the need for a flexible approach to monitoring in RP1. This is a new regime and it

is important that ORR's approach can react to and reflect on the emerging discussions with users and stakeholders – our ongoing research on road user priorities being a case in point.

Incentives and targets can influence behaviour - which makes it all the more important that the correct targets/incentives are chosen in the first place. From our perspective this means targets that focus attention on delivering the type of service that users want. Again, our research programme will help to develop this understanding.

We are conscious that many of the Key Performance Indicators (KPIs) and performance indicators (PIs) are set. One additional area that could be considered, however, surrounds journey time reliability. By this we mean the extent to which people can forecast or depend on a journey taking a similar time each time they make it – something especially important to the freight sector. Whilst we recognise the challenges in identifying a suitable indicator, we would be keen to help you and Highways England develop something which is also meaningful to users.

On a final point we would also endorse the comments made on transparency. We believe that transparency is a force for good. It enables choice and facilitates decisions and travel options. It also empowers people, better ensures the accountability of service providers and helps drive up standards.

This is one of the areas where we see genuine parallels with our (and ORR's) work on rail. We have seen a much greater appetite for improved availability and disaggregation of information amongst passengers. Rail passengers want information to be broken down to show and reflect their actual experiences; overall averages for performance can mask highs and lows across services, times of day and different points along the route. They also want data to be available at route level. Ultimately we believe that there should be no reason why a passenger should not be able to check on the performance of their specific train, using a database of performance statistics.

While there are clear differences between rail and road we believe these general principles are interchangeable: the provision of personalised, meaningful data can empower users and help to hold service providers to account for the service they deliver.

We would be happy to discuss any of these points in more detail.

Yours sincerely

Guy Dangerfield
Road User Director