**Department for Transport:**

**Consultation on proposals for the Creation of a Major Road Network**

**Response of Lancashire County Council**

Core Principles

*Q1: Do you agree with the proposed core principles for the MRN outlined in this document?*

The County Council supports the creation of a Major Roads Network (MRN) and access to the National Roads Fund to provide increased certainty of long-term funding secured across a number of years. Major highway improvement schemes now require a considerable amount of money to be committed up front to the development of Strategic Outline Business Cases and in most cases at risk given the uncertainties that have generally prevailed of late through various programmes in terms of securing funding to take a scheme forward to construction. The creation of a coordinated MRN pipeline will provide greater certainty to scheme promoters with regard to committing funding to the investigation and development work necessary to bring forward major highway improvement schemes.

It is essential that the MRN is defined on a consistent basis across the country so having an agreed set of criteria to determine the network will be critical in ensuring that the final network is coherent and meets Government objectives as set out in the consultation. As the establishment of the MRN will not involve any changes to local highway authority responsibilities, the views of local highway authorities on the inclusion or otherwise of routes in their area need to be considered seriously particularly those that do not cross local highway authority boundaries. Routes should not be included simply because there have been major improvements proposed on them previously.

Defining the MRN

*Q2: To what extent do you agree or disagree with the quantitative criteria outlined and their proposed application?*

Quantitative and qualitative criteria need to work in tandem; focusing simply on traffic flow could result in the inclusion of a large number of urban roads, as these generally tend to have the highest traffic flows. Likewise, too much emphasis on quantitative criteria could result in the exclusion of important pan-northern routes such as the A59 between Preston and Skipton. The County Council supports the use of HGV/LGV proportions but again caution needs exercising as it may not be appropriate to include roads that access large generators of heavy goods vehicle movements directly such as major distribution centres.

It would have been helpful for the Department for Transport to give some indication as to thresholds as it is not clear from the consultation whether DfT intends to use those from the Rees Jeffreys work, ie 20,000 vpd or 10,000 vpd provided at least 5% of that flow is HGVs or 15% is light vans.

*Q3: To what extent do you agree or disagree with the qualitative criteria outlined and their application?*

The County Council supports the use of qualitative criteria in identifying the MRN, but proposes that their use is subject to independent verification to ensure consistency of application across the country. The qualitative criteria proposed reflect those used by the Lancashire Enterprise Partnership's Transport for Lancashire committee in identifying a draft Key Route Network for Lancashire; however, caution is necessary in terms of access to / resilience for the SRN as the inclusion of all agreed motorway diversionary routes, for example, would lead to a much larger MRN than anticipated.

*Q4: Have both the quantitative and qualitative criteria proposed in the consultation document identified all sections of road you feel should be included in the MRN?*

The County Council participated in the development of Transport for the North's Major Road Network as set out in the draft Strategic Transport Plan for the North. This network is significantly larger than the indicative MRN included within the consultation, so clearly there will need to be a consolidation of views going forward, as it will be pointless having two MRNs defined in the North.

The County Council considers the indicative MRN to be a fair reflection of roads that should be included based on the approach proposed. Appendix A to this response provides a commentary on those roads included in the indicative MRN for which the County Council is the local highway authority.

*Q5: Have the quantitative and qualitative criteria proposed in the consultation identified sections of road you feel should not be included in the MRN?*

Several relatively small lengths of road included in the indicative MRN are clearly anomalies and require removal. These are highlighted in Appendix A.

*Q6: Do you agree with the proposal for how the MRN should be reviewed in future years?*

The County Council supports the proposal to review the MRN every five years as this will ensure consistency of approach across both the Strategic and Major Road Networks. DfT should however consider a mechanism for adjusting the MRN as and when new infrastructure becomes available for use.

Investment Planning

*Q7: To what extent do you agree or disagree with the roles outlined for local, regional and national bodies?*

As a member of Transport for the North (TfN), the County Council is supportive of the proposed role for STBs in developing a Regional Evidence Base as many local authorities may lack the resources and/or expertise to undertake this work. It will also ensure consistency of approach across significant geographic areas. Work has already commenced in the North through the commissioning of a number of Strategic Development Corridor studies by TfN. It is essential that local authorities retain responsibility to identify and put forward initial scheme proposals for inclusion in the Regional Evidence Base, as this will avoid the risk of any schemes entering the MRN Investment Programme that the local authority responsible for development, delivery and ongoing maintenance liabilities does not support.

Given there appears to be no intention by the Government to establish regional allocations for MRN investment within the National Road Fund, it is appropriate that the Department for Transport retains overall responsibility for programming and business case approvals.

*Q8: What additional responsibilities, if any, should be included? Please state at which level these roles should be allocated.*

None identified.

*Q9: Do you agree with our proposals to agree regional groupings to support the investment planning of the MRN in areas where no sub-national transport bodies (STBs) exist?*

Not relevant.

*Q10: Are there any other factors, or evidence, that should be included within the scope of the Regional Evidence bases?*

It is essential that Regional Evidence Bases take account of spatial plans within their areas, as spatial plans will be a significant determinant of future network demand. This will be of particular importance with regard to future housing delivery.

*Q11: Do you agree with the role that has been outlined for Highways England?*

The County Council has no specific comments on the role outlined for Highways England.

With major highway improvements totalling well in excess of £500m either recently completed or underway including through the Lancashire Growth Deal and the Preston, South Ribble and Lancashire City Deal, the County Council has gained significant experience in planning, developing, designing and delivering major highway schemes. We would be happy to share this with and support other local authorities through, for example, our membership of Transport for the North's Major Roads Group.

Eligibility & Investment Assessment

*Q12: Do you agree with the cost thresholds outlined?*

The proposed upper cost thresholds are too low. Two of the most recent major schemes in Lancashire: the Heysham to M6 Link Road opened in October and the Preston Western Distributor due to start construction in late 2019 have outturn prices of circa £150m. To deliver such schemes within the cost thresholds proposed would require a local contribution of circa £50m, likely to be beyond the ability of many local authorities to fund. The County Council would advise increasing the upper cost threshold to a maximum of at least £150m.

The County Council would advise the Department for Transport consider different cost thresholds for major structural renewals, as it is difficult to envisage many such schemes costing in excess of £20m, unless part of a 'package' (see our answer to Q13). Maintenance schemes of circa £5m to £10m are the most difficult to fund through local highway maintenance grant funding and its variants such as the Highway Maintenance Challenge Fund. The County Council would therefore recommend that the minimum contribution from the National Roads Fund for a major structural renewals scheme be set at £5m.

*Q13: Do you agree with the eligibility criteria outlined?*

The County Council supports the eligibility criteria as set out in the consultation document, subject to our response to Q12 with regard to the minimum cost threshold for major structural renewals. Otherwise, the Department for Transport should expand the 'Packages' approach to include major structural renewals.

*Q14: Do you agree with the investment assessment criteria outlined?*

The County Council agrees the investment criteria outlined are a sound basis from which to develop the Regional Evidence Base, with sufficient flexibility to support local and regional objectives. However, there is a risk that major structural renewals schemes may not emerge from the assessment process as none of the criteria relate specifically to raising the standard of the MRN. This becomes much less of an issue if the Department for Transport expands the 'package' approach to include major structural renewals as per our answer to Q13.

*Q15: In addition to the eligibility and investment assessment criteria described what, if any, additional criteria should be included in the proposal? Please be as detailed as possible.*

The addition of more criteria risks over-complicating the assessment process. However, there is no criterion for reducing carbon emissions; this needs rectifying and including in the Environmental Impacts under the Reduce Congestion objective. The Government's Industrial Strategy clearly identifies the pressing need to move towards a low carbon economy with decarbonising transport at the heart of the move to Clean Growth.

Other Considerations

*Q16: Is there anything further you would like added to the MRN proposals?*

The County Council welcomes the Government's proposal to create a Major Road Network and that funding from the new National Roads Fund will be available for improvements to this network from April 2020. In Lancashire, there are several locations on the indicative MRN where conflicts arise between use of a particular route by longer distance traffic, including heavy goods vehicles, and the effect that use has on local communities, particularly with regard to air quality, safety and loss of amenity. Bypasses have been proposed in the past, but the limited funding available to improve important local roads relative to the Strategic Road Network has been a major barrier to delivery.

East-west connectivity by road between East Lancashire, North Yorkshire and the Leeds City Region is currently restricted to single carriageway roads that tend to follow historic routes dictated by topography; most are poorly aligned and unsuitable for carrying large volumes of traffic, particularly heavy goods vehicles. Main line rail links are likewise constrained, with low line speeds, ageing infrastructure and limited capacity having a significant impact on journey times and reliability. Consequently, there is a strong perception locally that the transport network hinders the efficient movement of people and goods, and that this poor connectivity is having a negative impact on economic development and regeneration.

By way of example, the M65 ends abruptly at Colne, the continuation across the Pennines into North Yorkshire and the Leeds City Region provided by the A6068 and A56 routes linking with the A629 at Cross Hills in Airedale and the A59 at Broughton west of Skipton respectively. The indicative MRN includes the latter route but not the former. Congestion in the North Valley area of Colne is a particular issue with standing traffic affecting local air quality and effectively severing the North Valley housing estate from all amenities in the town. In the villages of Foulridge, Kelbrook and Earby further north along the A56, issues of road safety, noise, air quality and severance arise from the conflict between through traffic and the needs of the local communities. There are protected routes for bypasses of Colne-Foulridge and Kelbrook-Earby, but schemes have yet to progress.

Similarly, in West Lancashire, in October 2014 the County Council abandoned a long-standing proposal to construct a bypass of Ormskirk in part on the basis that there was no realistic prospect of securing funding for its delivery. The A570 is the most direct route between Southport and the motorway network, but passes through Ormskirk town centre where issues of road safety, noise, air quality and severance arise from the conflict between traffic and the needs of the local community. The alternative M58/A5758/A565 route via Switch Island is approximately 10 miles further, generally on higher standard roads. Other east-west routes across West Lancashire are very limited; those that do exist pass through small villages with narrow roads not suited for use by heavy goods vehicles.

Elsewhere, delivering new and upgraded road infrastructure is central to the Preston, South Ribble and Lancashire City Deal. Improvements to the A582 South Ribble Western Distributor will support a number of strategic housing locations together with the regionally significant Cuerden Strategic Site, which lies close to the intersection of the M6, M61 and M65 motorways and has the potential to create over 4,500 new jobs locally. Ultimately, City Deal partners aspire to deliver a new crossing of the River Ribble that would connect the South Ribble Western Distributor with the Preston Western Distributor, providing a continuous dual carriageway for distributing regional and local traffic movements across a wide area including Central and West Lancashire and the Fylde Coast. This would reduce pressure on the M6 between Junctions 29 and 32 and provide much needed network resilience.

**APPENDIX 'A': Commentary on the Indicative MRN in Lancashire**

**M65: Junction 10 (Burnley) to Junction 14 (Colne)**

The M65 is the main route linking the East Lancashire towns of Blackburn, Accrington, Burnley, Nelson and Colne with the M6 (Junction 29) and M61 (Junction 9) at Bamber Bridge near Preston. It is also part of a broader strategic 'Central Pennines' transport corridor extending eastwards from the Fylde Coast across to the Leeds City Region. The M65 forms the economic spine of East Lancashire, connecting people and businesses internally, and is particularly important for the movement of freight. This particular section is a dual two-lane motorway for which the County Council is the highway authority.

**A59: Merseyside boundary to A582 in Penwortham**

The A59 is a former trunk road linking Liverpool and Preston via Ormskirk and is the most direct route between the two cities, albeit slower than via the M58 and M6. At Tarleton, it is joined by the A565 from Southport, also a former trunk road. The A59 passes through both Ormskirk and Burscough and becomes increasingly urban in character as it approaches the Preston built-up area at Howick Cross. Completion of the Penwortham Bypass, on which work has commenced and due for completion in spring 2020, will link the A59 at Howick Cross with the A582 at Broad Oak, removing through traffic from Penwortham and improving access to the motorway network via the A582. This will necessitate a change in the indicative MRN.

The indicative MRN includes both the Penwortham 'New' Bridge (formerly part of the trunk road network) and the later crossing down river constructed in the 1980s as part of an earlier phase of the Penwortham Bypass. The inclusion of the former is an anomaly. With regard to the latter, once the Preston Western Distributor is open to traffic, the County Council would wish to see the entire route to the west of Preston between the M6/M65 at Bamber Bridge and the M55 at Bartle included in the MRN.

**A59: M6 Junction 31 at Samlesbury to North Yorkshire boundary**

East of Preston, the A59 is a former trunk road that runs generally in a north-easterly direction through the Ribble Valley before crossing into North Yorkshire to meet the A56 at Broughton west of Skipton. It then continues through Harrogate to meet the A1(M) at Junction 47 west of York. In Lancashire, the route has benefitted from considerable improvements over the last 30 years and for much of its length is a good standard single carriageway road with the effects of long inclines relieved by climbing lanes. There are short lengths of dual carriageway between the M6 and Samlesbury and at Barrow between Whalley and Clitheroe. Most settlements now have bypasses, the exceptions being Osbaldeston and Copster Green at the western end of the route and Gisburn further to the east. The Enterprise Zone at Samlesbury has direct access/egress.

**A65: Cumbria Boundary to North Yorkshire Boundary**

The A65 is a former trunk road linking the M6 at Junction 36 in South Cumbria with Bradford and Leeds via Skipton and Ilkley. Only a short length of the single carriageway route lies within Lancashire.

**A565: Merseyside boundary to A59 at Tarleton**

The A565 is a former trunk road linking Southport with the A59 at Tarleton and with which it forms an important regional route connecting the Sefton Coast with Central Lancashire and the M6.

**A570: Merseyside boundary north of Rainford to Merseyside boundary at Southport**

The A570 is a former trunk road linking the A580 north of St Helens with the M58 at Junction 3 west of Skelmersdale and thence Southport via Ormskirk. South of the M58, the A570 is a dual carriageway; to the north-west, the single carriageway road passes through the centre of Ormskirk where issues of road safety, noise, air quality and severance arise from the conflict between traffic and the needs of the local community. Between Ormskirk and Southport, the A570 is a relatively narrow, rural road that passes through the villages of Pinfold and Scarisbrick, with numerous residential and commercial properties all having direct access/egress. In October 2014, the County Council abandoned a long-standing proposal to construct a bypass of Ormskirk in part on the basis that there was no realistic prospect of delivery.

**A582: M65 Junction 1a at Bamber Bridge to A59 in Penwortham**

The A582 South Ribble Western Distributor links parts of Central and West Lancashire to the motorway network. It is a modern standard road with access generally restricted to major junctions that are either roundabouts or controlled by traffic signals. Through the Preston, South Ribble and Lancashire City Deal, the route will be progressively upgraded to ultimately provide a dual carriageway standard link between the M6/M65/M61 at Bamber Bridge and Penwortham Bypass. City Deal partners also aspire to deliver a new crossing of the River Ribble that would connect the completed Penwortham Bypass with the Preston Western Distributor, providing a continuous dual carriageway for distributing regional and local traffic movements across a wide area including Central and West Lancashire and the Fylde Coast. This would reduce pressure on the M6 between Junctions 29 and 32 and provide increased network resilience.

**A586/A588: Blackpool Boundary to A585 at Skippool via Poulton-le-Fylde\***

It is not clear why the short length of A588 through Poulton town centre appears in the indicative network. To ensure a coherent network it would make more sense to include the length of A586 between the Blackpool boundary and the A585 trunk road at Little Singleton and exclude the A588. The A585 links Fleetwood and the extensive urban areas of North Blackpool, Thornton-Cleveleys and Poulton-le-Fylde with the M55 at Junction 3 north of Kirkham. Highways England is currently taking forward a scheme to bypass the Little Singleton pinch point, which is likely to increase the attractiveness of the A586 as a route into North Blackpool from the motorway network.

**A679/A646: M65 Junction 9 at Rose Grove to West Yorkshire (Calderdale) boundary**

This former trunk road leaves the M65 at Junction 9 and passes along the western and southern edges of Burnley before heading through Holme Chapel to Todmorden, from where it continues along the Calder Valley to Halifax. For much of its length, the route is poorly aligned, with a considerable number of junctions and other accesses. Consequently, speeds are low and journey times high. The proximity of development and the enclosed nature of the valley through which the route passes would make any significant improvements very difficult to achieve.

**A683: M6 Junction 34 to Heysham Port**

The A683 links the Port of Heysham and Morecambe with the M6 at Junction 34 and is strategically important for the movement of freight between the UK mainland and Northern Ireland, the Isle of Man and the Irish Republic. Heysham is a major port and handled over 4.5m tonnes of traffic in 2016. Phase 1 of the Heysham to M6 Link Road between Heysham and White Lund in Morecambe was constructed in the mid 1990s, with the dual carriageway Phase 2 (the 'Bay Gateway') opening to traffic in October 2016.

**A6068/A56: M65 Junction 14 at Colne to North Yorkshire Boundary**

The M65 ends abruptly at Colne, the continuation across the Pennines into North Yorkshire and the Leeds City Region provided by the A6068 and A56 routes linking with the A629 at Cross Hills in Airedale and the A59 at Broughton west of Skipton respectively. The indicative MRN includes the latter route but not the former. However, taken together the A56/A59 and A6068 routes, which are only 8km apart, comprise the most heavily trafficked Trans-Pennine road corridor after the M62, with a combined traffic flow of up to 26,000 vehicles per day.

Congestion on the A6068 in the North Valley area of Colne is a particular issue with standing traffic affecting local air quality and effectively severing the North Valley housing estate from all amenities in the town. The A56 heads in a northerly direction from the A6068 in Colne through the villages of Foulridge, Kelbrook and Earby before crossing into North Yorkshire at Thornton-in-Craven to meet the A59 at Broughton. Significant lengths of the poorly aligned single carriageway road are subject to a speed limit of 40 mph or less with limited opportunities for safe overtaking. In the villages, issues of road safety, noise, air quality and severance arise from the conflict between through traffic and the needs of the local communities.

**A6068/A671: M65 Junction 8 to A59 at Whalley**

This route links the M65 and A56 trunk road at Junction 8 with the A59 between Whalley and Clitheroe and for much of its length is a good standard single carriageway road. The Shuttleworth Hall Link immediately to the north of Junction 8 incorporates a southbound climbing lane. However, the route still passes through the villages of Read and Simonstone with a number of residential and commercial properties having direct access/egress.

The following short sections of road shown on the indicative MRN map are anomalies and should not be included:

A56 Colne town centre

A671 Short section north-west of Padiham

A678 Short section west of Padiham linking A671 to A6068

A680 Through Haslingden