

Preston Western Distributor

Full Business Case

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April 2019

Preston Western Distributor

Project No: B2237517/686

Document Title: Full Business Case

Document No.: 686/10

Revision: 1

Date: April 2019

Client Name: Lancashire County Council

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File Name: P:\B2000000\B2237517 - Preston Western Distributor OBC\3 JC Tech Work\3.3 FBC

Model Update\3.3.2 Reports\7.FBC\Preston Western Distributor FBC rev03.docx

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Document history and status

Revision	Date	Description	Ву	Review	Approved
0	28/11/2018	Draft- Issue to LCC	SM	MR	SM
1	16/01/2019	Economic Case Draft- for review	MR	SM	SM
2	11/04/2019	Final Draft for LEP Assurer's review	MR	SM	SM
3	30/04/2019	Final document for submission to TfL	MR	SR	SM

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1. Introduction

1.1 Background

Lancashire County Council (LCC) is seeking funding to enhance economic growth and housing provision through the delivery of a significant new road scheme on the western edge of Preston.

The Preston Western Distributor (PWD) is one of four major highway schemes identified in the **Preston**, **South Ribble and Lancashire City Deal**, agreed with the Government in September 2013 to deliver transformative, nationally significant levels of housing and employment growth in the City. The scheme is also in the Lancashire Enterprise Partnership's (LEP) agreed and prioritised investment programme.

It is a key component of the programme of measures set out in the **Central Lancashire Highways and Transport Masterplan** that collectively will support the scale of development set out in the approved **Central Lancashire Core Strategy**, and will mitigate its impact on the transport network.

The scheme comprises a 4.3km road, which will link the M55 at a new Junction 2 near Bartle with the A583/A584 to the west of Lea. The East-West Link Road (EWLR) and Cottam Link Road will provide access to the local and through traffic to use the PWD, including the Strategic North West Preston location, which will accommodate over 5,000 new homes. The PWD Scheme route including EWLR and Cottam Link Road is shown in Figure 1-A below.

The scheme will improve travel between the **Strategic Road Network** and the **Enterprise Zone at Warton** and Springfields nuclear fuel facility at Salwick, and **facilitate provision of a new railway station at Cottam** on the soon to be electrified Preston to Blackpool North railway line.

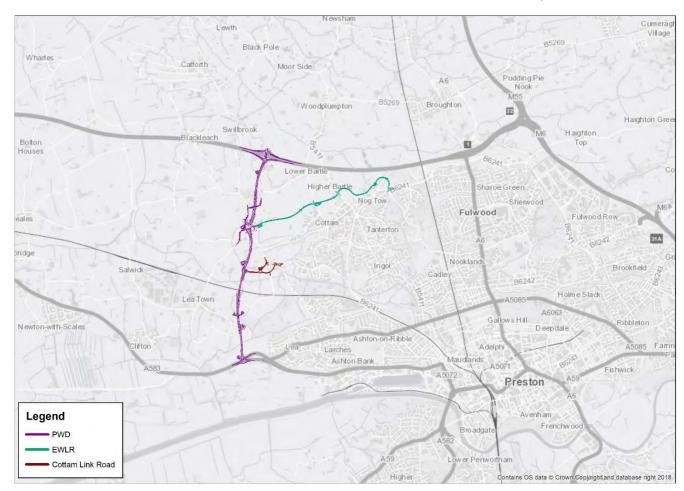


Figure 1-A: Preston Western Distributor - Scheme Route

As a result of the above, the scheme is expected to directly support and unlock the following outputs and benefits:

- Delivery of 5,000+ new dwellings in the North West Preston Strategic Housing Location, a local delivery priority, linked to the requirement for additional housing in support of national housing economic objectives;
- Improved access to the Enterprise Zone at Warton, a centre of advanced manufacturing and high productivity, to support its continued growth and expansion;
- A reduction of traffic at key congestion pinch points on the network, especially in terms of access to the Strategic Road Network currently, including M55 Junction 1, M55 Junction 3, and on radial and arterial routes in Preston;
- Marked improvements for local communities and their environment with the improvements in Air Quality Management Areas, reduction in noise levels on the existing highway network and the net gains due to the mitigation measure to ecology and the landscape environment;
- Facilitate access to a new 'parkway' railway station at Cottam on the soon to be electrified Preston to Blackpool North railway line. This will serve the strategic housing location, the wider Wyre and Fylde area and enhance local rail connectivity; and
- Facilitate the provision of public transport and environmental / public realm improvements within and on routes to and from Preston.

The scheme will deliver the above outputs and benefits through the following measures:

- New road infrastructure with sufficient capacity to support traffic generated by new housing and employment growth;
- A new junction on the M55 as an integral part of the scheme; and
- Once delivered, bus priority measures, public realm enhancements and improvements to promote walking and cycling along the A6 Garstang Road, B5411 Tag Lane/ Woodplumpton Road and A583 Riversway corridors, and at the Lane Ends district centre.

Together, and facilitated through the PWD scheme, the above outputs will ensure that Preston and Lancashire remain a key part of the Northern Powerhouse and continue to play a pivotal role in the long-term sustainability of the North's economy.

Connectivity and access to employment and transport hubs are fundamental to maximising economic growth locally, and strengthening a national transport hub on both the strategic and rail network.

1.2 Purpose of Document

This document represents the Full Business Case (FBC) for the Preston Western Distributor preferred option.

It has been developed in line with the structure now mandated by the Department for Transport's (DfT) Transport Business Case guidance to establish whether the preferred option is:

- Supported by a robust case for change that fits with wider policy objectives (the Strategic Case);
- Demonstrates value for money (the Economic Case);
- Financially affordable (the Financial Case accounting analysis);

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- Commercially viable (the Commercial Case procurement issues); and
- Achievable (the Management Case deliverability assessment).

It should be noted that due to different funding arrangement for the EWLR it is not considered part of the PWD for the purpose of the Economic Case and subsequently the cost and benefits associated with the EWLR have not been included in the Value for Money assessment of the scheme. Conversely, Cottam Link Road is considered an integral part of the scheme for the purpose of the Business Case.

1.3 Document Structure

The remainder of the document is structured as follows:

- Chapter 2: Scheme History and Scheme Description
- Chapter 3: The Strategic Case
- Chapter 4: The Economic Case
- Chapter 5: The Financial Case
- Chapter 6: The Commercial Case
- Chapter 7: The Management Case
- Chapter 8: Summary and Conclusions

2. Scheme History & Scheme Description

2.1 Introduction

The **Central Lancashire Highways and Transport Masterplan** was adopted in March 2013. It sets out the County Council's priorities for future investment in highways and transport across Central Lancashire.

The masterplan recognises that creating additional capacity is a key to accommodating the scale of new development set out in the Central Lancashire Core Strategy alongside improving the most important bus corridors and enhancing 'the public realm' to encourage walking and cycling.

The **Preston, South Ribble and Lancashire City Deal** (September 2013) agreement with the Government secured Local Growth Fund contributions for two of the four major road schemes identified in the Highways and Transport Masterplan in order to unlock the housing and employment potential within Lancashire, and to transform the City Deal area, growing the local economy by over £1bn, and making Central Lancashire an even better place to live.

The schemes to be delivered in the period to 2026 are:

- Preston Western Distributor:
- A6 Broughton Bypass;
- Penwortham Bypass; and,
- A582 South Ribble Western Distributor upgrade.

The schemes identified in the masterplan will enable the planned new developments to go ahead, achieve marked improvements for local communities and their environment and allow significant complementary improvements to sustainable travel infrastructure.

Delivery of these schemes is essential to resolving current and future problems and issues that could otherwise result in the gridlock of the highway network and missed opportunities to develop the local economy.

The Preston Western Distributor scheme will support the delivery of the **North West Preston Strategic Housing Location**, a nationally significant level of housing growth, at over 5,000 dwellings, and improving access to the Strategic Road Network from the Enterprise Zone at Warton. Warton, alongside Springfields nuclear fuels at Salwick, represents a key centre of advanced manufacturing for both Lancashire and the Northern Powerhouse Economy, in key economic centres as identified in Transport for the North's own **Independent Economic Review (IER)**; recently completed.

Furthermore, the proposed scheme is expected to alleviate congestion issues on the main arterials within Preston urban areas by shifting traffic from the M55 J1/A6 and M55 J3/A583 corridors to the new M55 J2 and the PWD route. As a result of traffic re-routing to this new standard dual carriageway, the scheme is also anticipated to improve road safety in the area and reduce the number of accidents particularly on the A583 and A6 roads.

The history and key elements of the scheme are detailed in the subsequent sections of this chapter.

2.2 Scheme History

It has been evident over many years that the existing transport network serving Preston and the wider area is becoming increasingly congested, despite a range of improvements and sustainable travel measures that have been introduced. Recognising the issue, the Central Lancashire local authorities agreed to fund a transport strategy and masterplan to study traffic flows on the transport network to

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permit a more comprehensive and strategic analysis of how the area's transport network functions and the potential alternatives to satisfying current and future traffic demands.

This study brought into particular focus the preparation of the **Central Lancashire Core Strategy** and the scale and distribution of new housing to be accommodated as part of the area's development strategy. The strategic development areas identified in the plan, in North West Preston and along the A582/B5253 in South Ribble, prompted the County Council, as Transport and Highway Authority, to conclude that simply relying on improvements to the existing network would not be enough to cope with future demand levels.

Instead, substantial additional transport infrastructure would be required to serve this new development and growth in the wider area. The County Council undertook work to develop a solution to support the area's growth and deliver the Core Strategy.

As a result, Central Lancashire was the first area in the County to have a **Highways and Transport Masterplan** (CLHTM) put in place. These masterplans were identified in the **Local Transport Plan** as a means for highway and transport implications to properly inform and influence Lancashire's development and growth, and provide a sound basis to determine transport investment priorities.

Supporting the development of the CLHTM, consideration was given to numerous measures to determine whether they could improve travel on the existing road network by providing a level of relief sufficient to resolve existing problems and serve future demand from proposed development and growth in the area. Numerous measures were identified across the area and across all modes of travel, but these assessments made it clear that even with a major programme of sustainable transport improvements these would not have the necessary impact. Indeed, these measures would not compensate for even modest traffic growth between now and 2026.

It became apparent through independent technical assessment underpinning the CLHTM that the current transport network serving Preston and South Ribble simply does not have enough spare capacity to allow significant changes to improve bus journey times and enhance public realm to encourage walking and cycling. This lead the masterplan to conclude that significant additions to existing highway infrastructure, of a scale and location to support the area's strategic development sites, would be needed to support the development aspirations of Central Lancashire.

Accepting that there is no choice but to create new highway capacity to serve new development, consideration was given through the masterplan exercise to the route for a new western distributor for Preston as part of major package of integrated transport improvements, including creation of new highway capacity, to support new development and allow significant improvements to sustainable transport provision and resolve issues that could otherwise mean gridlock for the existing network.

The initial indication of this major highway improvement came as part of the public consultation exercise for the CLHTM, and showed a route from A583 in the general vicinity of the junction of A5085 and A583, northwards to M55. The final published CLHTM identified an 'indicative search corridor' along this same line, 500m wide, in which the proposed road would be situated, and based on this evidence-led plan, was agreed with government as a key intervention as part of the **Preston City Deal**.

Since this initial identification, a preferred route for the PWD and its associated link roads has been adopted within the search corridor and subsequently consulted on, and whilst alternative alignments were considered, constraints within the corridor restricted the number of alternative options for the route. Following full consideration of the comments and suggestions made as part of the public consultation exercise in May-June 2014, the preferred route was adopted in November 2014.

The **Preston Local Plan** 2012-2026 (Site Allocations and Development Management Policies, adopted in July 2015) contains a policy (IN1) that states that: "A preferred route is safeguarded for the Preston Western Distributor Road in the location shown on the Policies Map. Planning permission will not be granted for any development that would prejudice the construction of the road".

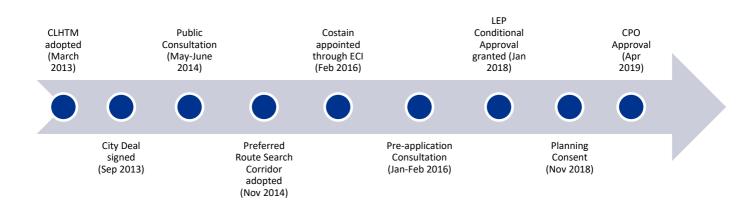
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Following the adoption of the preferred route for the scheme the County Council started work on a planning application. As part of the pre-application process a second round of public consultation was held in January-February 2016.

In early 2016 Costain was appointed as contractor for the scheme through the Early Contractor Involvement (ECI) contract. The contract includes supporting the Council in delivering the scheme through the statutory process, including planning and design development prior to project delivery.

The PWD Outline Business Case was given Lancashire LEP conditional approval in early 2018 and the scheme was granted planning permission by the development committee in November 2018.

The Compulsory Purchase Procedure to assemble the necessary land was concluded In April 2019 by the Secretary of State for Transport confirming Compulsory Purchase and Side Road Orders. The scheme is now unfettered by Planning and Land Assembly matters.



2.3 Scheme Description

The PWD preferred option consists of construction of a new 4.3 km dual carriageway road to support delivery of the North West Preston strategic housing location (more than 5,000 dwellings) and improve access to both the Strategic Road Network in Northwest Preston, and to/from the Enterprise Zone at Warton.

The scheme includes a new all moves junction with the M55 (Junction 2) and a new junction at A583/A5085 Blackpool Road/Riversway. It also includes two new roundabouts for connection with the Cottam Link Road and the East-West Link Road (EWLR).

As part of the scheme several minor roads (e.g. Lea Road, Sidgreaves Ln) will be altered in the provision of a new roundabout to connect north/south and to/from the EWLR. The EWLR provides the spine through the Strategic Housing Development and therefore providing the 5000+ proposed houses connectivity to the PWD. Additionally, it connects the PWD scheme directly with the existing highway network at Lightfoot Lane. It should be noted that whilst the PWD and EWLR are interdependent, the funding arrangements for the two schemes are different and therefore for the purpose of the PWD FBC it is assumed that the EWLR is a separate scheme and the cost and benefits associated with it are not included in the VfM assessment of the PWD. Conversely, the Cottam Link Road providing access into Cottam development areas and the potential Cottam Parkway Rail Station is included in the PWD scheme.

A segregated 3-m wide footway and cycleway on the Eastern side of the PWD with controlled crossing facilities at all junctions on the route will also be part of the scheme, extending from A583/A5085 Blackpool Road to Sidgreaves Lane / Lea Lane. Together with the footpath and cycleway route along the EWLR it will provide direct access to the new community of North West Preston and other existing

developments. The new route will be integrated with cycle routes facilities (such as Guild Wheel, Northern Loop and National Cycle Route via Cottam Link Road). The overall proposed arrangement has the potential to greatly increase the amenity value of the surrounding area for Non-Motorised Users (NMU) and attract an increased number of NMUs to the area which will result in a significant positive impact.

A map showing the location of the scheme including the EWLR and Cottam Link Road is included in Figure 2-A below.

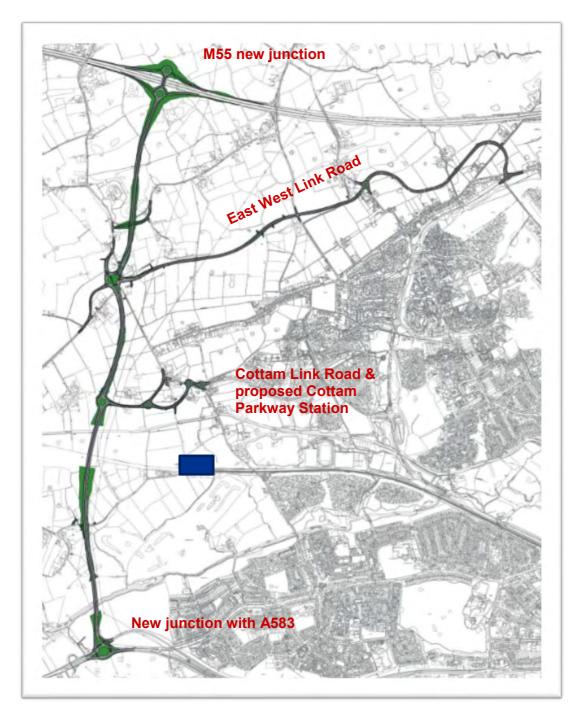


Figure 2-A: Scheme Location

Scheme plans / drawings are included in Appendix A.

3. The Strategic Case

3.1 Introduction

The Strategic Case determines whether or not an investment is needed, either now or in the future. It demonstrates the case for change - that is, a clear rationale for making the investment; and strategic fit - how an investment will further the aims and objectives of the Lancashire Local Enterprise Partnership (LEP).

More specifically, and in line with guidance, the Strategic Case should:

- Specify the business need for a project;
- Set the context and identify a series of investment aims;
- Assess the investment aims against what the LEP (and Government) wants to achieve as a whole;
- Determine the case for change and strategic fit should be an iterative process as the business case develops, and always supported by robust evidence, such as identifying key risks and constraints; and
- Consult main stakeholder groups.

The Strategic Case for the Preston Western Distributor (PWD) scheme is discussed in detail under the following sub-headings:

- Understanding the current situation
- Understanding the future situation
- Establishing the need for intervention
- Scheme Objectives
- Options Identification and Selection
- Strategic Fit
- Political Support
- Stakeholders & Consultation
- Internal and External Business Drivers
- Impact on the Local Economy
- Synergy
- Conclusion

3.2 Understanding the Current Situation

3.2.1 Introduction

This section of the Strategic Case aims to develop an understanding of the current transport situation in Central Lancashire and identify any transport related problems which justify the need for a transport intervention.

3.2.2 Existing Network & Transport Services

The Preston urban area is bounded by the M55 to the north, the M6 to the east and the River Ribble to the south. The city centre itself is connected by the A583 / A5085 to Blackpool, the A6 to Garstang and Chorley, crossing the River Ribble, and the A59 which connects to Southport and Liverpool in the south west and Blackburn and the Ribble Valley in the east and shares two Ribble bridges in Preston with A582 traffic.

Preston is well connected to the strategic road network, being served by four motorways:

- M61 Preston to Manchester (via Chorley and Bolton) accessed at J9;
- M65 Preston to Colne via (Blackburn, Accrington and Burnley) accessed at J1;
- M55 Preston to Blackpool (via Kirkham) accessed at J1; and
- M6 for travel north and south towards Scotland and the Midlands accessed at junctions 29, 31, 31a (southbound access and northbound exit only) and via M55 J1.

The majority of the key 'A' roads are 30-40mph single carriageways, constrained by their urban or semiurban surroundings. The exceptions are stretches of dual carriageway on the A6, A582 and A59 all south of the Ribble.

The motorways and key 'A' roads in Preston are shown in Figure 3-A.

Preston is served by one railway station towards the south of the city centre; this is a major stop on the West Coast Main Line (WCML), with long distance train services to Manchester, Birmingham and London (Euston) in the South and Glasgow and Edinburgh to the North. It also provides Northern Rail services in the North West and Yorkshire, with direct services to Blackpool (4tph), Lancaster (3-5tph), Blackburn (2tph), Bradford (1tph), Leeds (1tph), Wigan (4tph), Bolton (2tph), Manchester (4tph) and Liverpool (1tph direct with up to 2tph via Wigan).

Other local stations at Salwick, Leyland, Lostock Hall and Bamber Bridge provide access only to a limited set of Northern Rail services and none of the long distance WCML services that benefit Preston railway station.

The Preston urban area has a local bus network connecting local communities and the city centre with at least hourly services run by Preston Bus and Stagecoach.

Within the North West Preston area, Tanterton, Ingol and Lea have direct bus services into Preston City Centre with a frequency of 6 buses per hour at peak times. Cottam however is connected to the centre by just 2 buses per hour.

Figure 3-B shows the primary Preston Bus routes that operated in 2016 with a frequency of at least 3 buses per hour.



Figure 3-A: Existing Transport Infrastructure

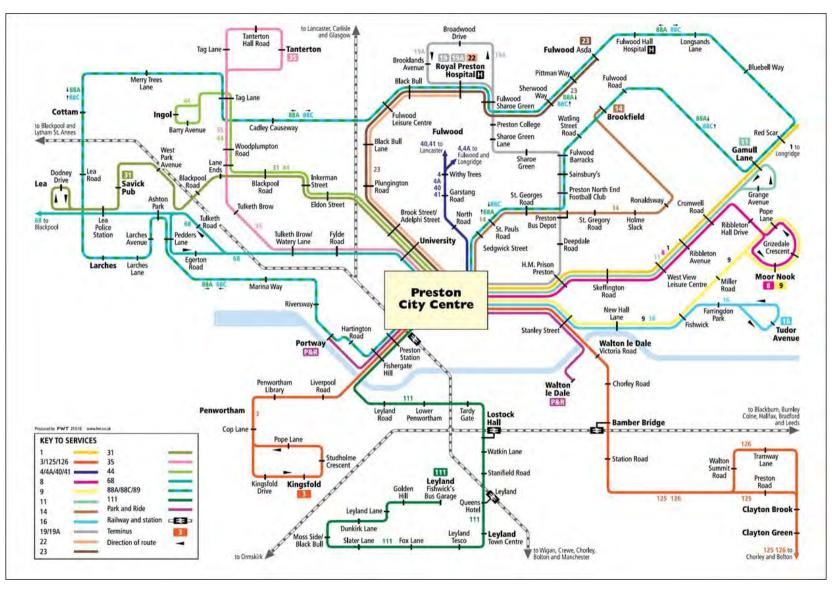


Figure 3-B: High Frequency Preston Bus Network (buses every 20 minutes or better)

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Longer distance bus routes across Lancashire are accessible from Preston Bus Station. Locations accessible by bus include Blackpool, Lancaster, the Ribble Valley and Skipton, Blackburn, Burnley, Leyland, Chorley, Bolton, Wigan, Southport and Liverpool.

The existing key road network, rail network and public transport hubs in Preston and the local surrounding area can be seen in Figure 3-A.

3.2.3 Travel Demand & Patterns

As Preston is a major employment hub, the city acts as a large net importer of labour both from within Lancashire and from outside of the county with a net inflow of around 23,000 commuting trips. This is demonstrated in Figure 3-C and Figure 3-D below.

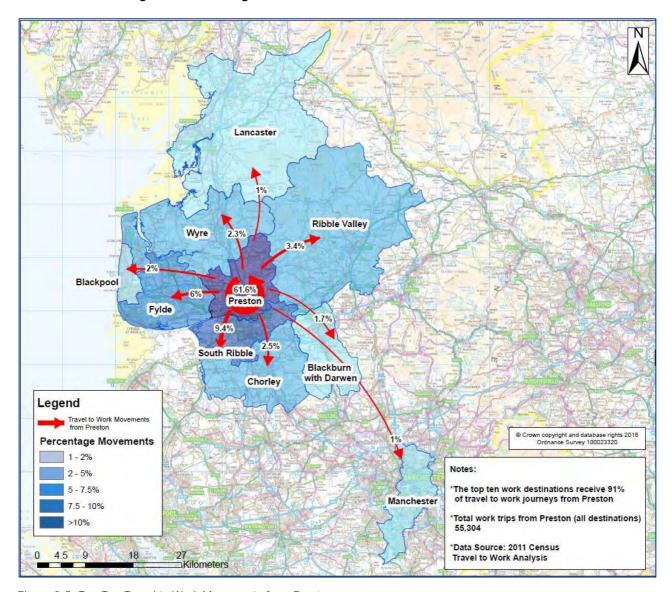


Figure 3-C: Top Ten Travel to Work Movements from Preston

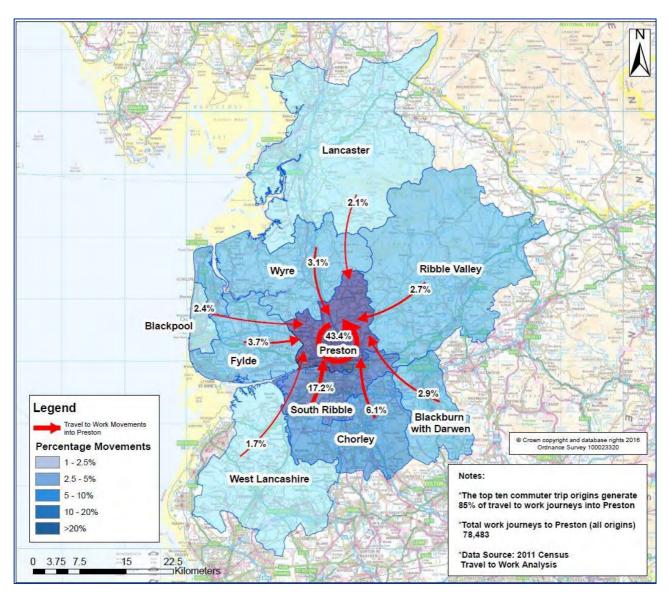


Figure 3-D: Top Ten Travel Movements to Work into Preston

Private car is the predominant mode of transport and the main method of commuting in comparison to the public transport alternatives within the Preston District. As shown in Table 3-A the percentage of people driving to work by car (59%) and as a passenger (7%) is significantly larger than rail (1%), bus (11%) or walking and cycling (16%).

Method of Travel to Work	Percentage of People in Employment			
Method of Travel to Work	Preston	North West	England and Wales	
Driving a car / van	59%	63%	58%	
Passenger in car / van	7%	6%	5%	
Bus	11%	8%	7%	
Train	1%	3%	5%	
Walking	14%	11%	11%	
Cycling	2%	2%	3%	
Other (including working from home)	6%	7%	11%	

Table 3-A: Method of Travel to Work (Census 2011)

The private car use for commuting in Preston is consistent with the statistics for England and Wales.

Walking and bus travel together account for 25% of commuter trips in Preston which is 6% higher than the North West average.

This is likely due to the urban nature of Preston where journeys will be shorter compared to the rural journeys included in the regional and national averages, and the limited lack of local rail services in particular, meaning that bus is the only public transport option available for most trips within the Preston area.

The population's reliance on the car is also reflected in the high level of car ownership.

Table 3-B below shows that 75% of households within Central Lancashire and 69% of the households within Preston have at least one car or van, and 31% and 26% respectively have two or more cars.

This compares to 75% of households in England which have one car or van and 30% which have two or more car or vans.

No. of cars in the household	Preston	Central Lancashire	England
No cars or vans	31%	25%	25.6%
1 car or van	42.2%	43.4%	42.2%
2 cars or vans	21.3%	24.7%	24.7%
3 cars or vans	4.1%	5.2%	5.5%
4 or more cars or vans	1.4%	1.7%	1.9%

Table 3-B: Car Ownership (Census 2011)

3.2.4 Baseline Traffic Conditions

Table 3-C shows the observed Annual Average Daily Traffic (AADT) flows on the arterial routes in Preston, to and from Preston, and the strategic road network and how they compare with the Congestion Reference flows (CRF) for this type of road¹. Figure 3-E shows the roads and the locations of the sites where observed traffic data was collected.

Road	Observed AADT of arterial routes (2-way, vehicles)	Congestion Reference Flow
A6 (North of Preston)	25,000	21,000
A6 (South of Preston)	36,000	33,000
A582	32,000	32,000 / 58,000
Tom Benson Way	12,000	21,000
Eastway	15,000	21,000
A583	26,000	33,000
A5085	11,000	21,000
A59	32,000	25,000 / 58,000
M6 J31a-J32	98,000	130,000
M55 J1-J3	54,000	97,000

Table 3-C: Arterial Route AADTs

Comparison of the observed AADT to CRF traffic levels shows that the some of the roads (A6 north and south of Preston, the A59 within Penwortham and the single carriageway sections of the A582) carry more traffic than they were designed to. It should be noted that the CRF applies to the link capacity only and the effect of junctions must be considered separately.

¹ The CRFs are given for a typical road of the same type (DMRB Volume 5 Section 1, Part 3 TA 46/97, Annex D (rural roads and motorways), TA 79/99 (urban roads)). The CRF is the level of traffic at which congestion is likely to exist in the peak periods

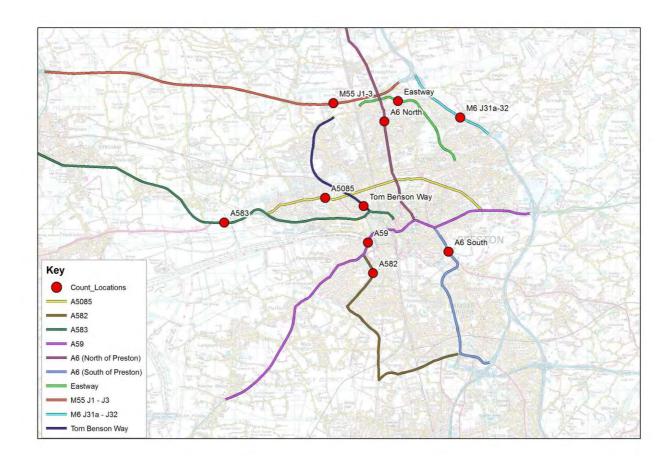


Figure 3-E: Routes with Highest Volumes of Traffic

3.2.5 Identified Problems

The limited capacity of the road network, together with the very high traffic demand is the main cause of congestion in and around Preston.

Congestion is especially severe at peak commuting times, but these times are getting longer and spreading as more and more people change their travel arrangements to try and avoid the 'rush hour'2.

Analysis of congestion along the key arterial routes during the morning and evening peak times has been undertaken using TrafficMaster data collected in September-November 2013. The results of the analysis are shown in Figure 3-F and Figure 3-G for both AM and PM peak periods respectively. It can be seen that there are multiple locations along the key arterial routes where the average traffic speed is below 20mph.

Whilst the traffic data is 5 years old there is no evidence that the situation has improved since the data was collected. On the contrary, according to RTF15 the traffic would increase by 7% between 2013 and 2018. This was further reinforced through a comparison of 2013 counts to 2018 counts on few major links in the north of Preston- indicating an increase in traffic.

 $^{^{\}rm 2}$ Central Lancashire Highways and Transport Masterplan, March 2013

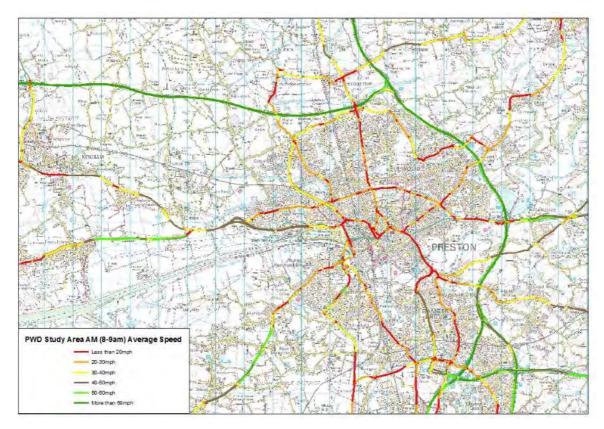


Figure 3-F: TrafficMaster Average Speeds - AM

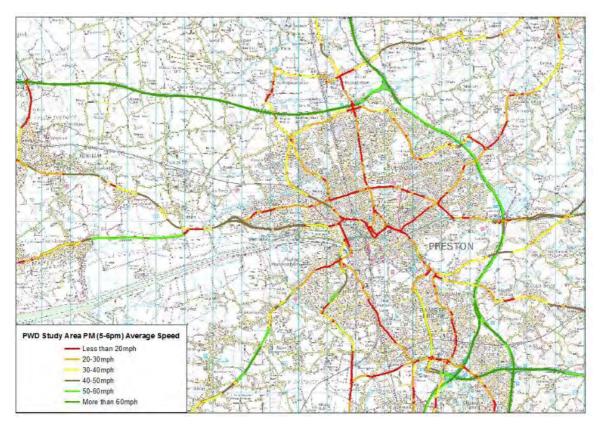


Figure 3-G: TrafficMaster Average Speeds - PM

Congestion also currently results in significant delays to traffic at key junctions in Preston; rather than just slow speeds in TrafficMaster data. This has been used, along with supporting local knowledge and outputs from the Central Lancashire Highway Transport Model (CLHTM) to produce a list of junctions with significant delay per vehicle (greater than 30 seconds delay per vehicle) on their approaches, and

to highlight points of congestion in and around Preston. This is shown Table 3-D. The location of the junctions is shown in Figure 3-H.

Junction Number	Major road	Junctions with Significant Delay
Number 1		J1 Off-Slips to A6
2	M55	A585 approaches to J3
3		M55
4	M6	M61
5		Broughton Crossroads
6		Eastway
7		Lightfoot Lane
8		Black Bull Lane
9		B6242
10		A5085
11	A6	Aqueduct Street
12		Sedgewick Street
13		Church Street
14		A59
15		Capital Way
16		A582
17		B6258
18		Wychnor
19	Footwoy	A6
20	Eastway	Sherwood Way
21		B6421
22	Tom Benson Way	Tulketh Brow
23	Tom benson way	A583
24	B5411	A5085
25		Lea Road
26		Pedders Lane
27		Brook Street
28	A5085	A6
29		Miller Road
30		B6243
31		Sir Tom Finney Way
32		Freckleton road (Kirkham)
33	A583	Pedders Lane
34	7.000	Port Way
35		A5072
36	A584	Kirkham Road (Freckleton)
37		Lindle Lane
38		Cop Lane
39		A582
40	A59	A5072
41		Wellfield Road
42		Bow Lane
43		M6 J31

Junction Number	Major road	Junctions with Significant Delay
44		Arnhem Road
45		Scotforth Road
46		A6
47		Friargate
48	B5254	Through Lostock Hall
49		A59
50	A582	Chain House Lane
51	A302	Croston Road
52		B5254/A5083
53		M6 J31a
54	B6242	B6421
55		M6 J31a

Table 3-D: Major Road Junctions with Significant Delay (2014)

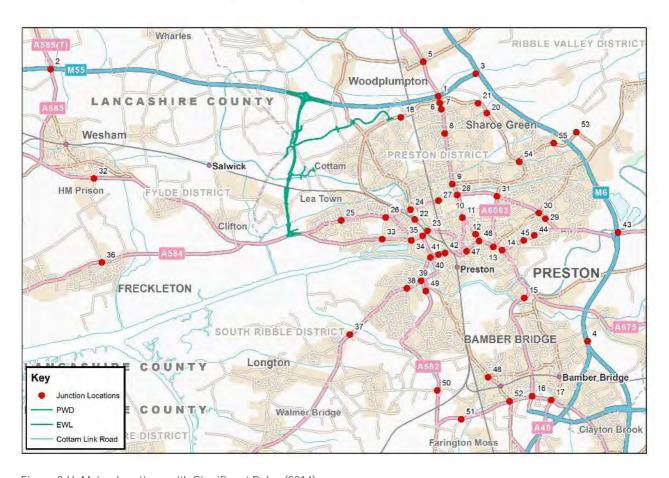


Figure 3-H: Major Junctions with Significant Delay (2014)

The number of junctions is extensive and covers each of the core radial and arterial routes to/from Preston, as well as to/from the Strategic Motorway Network, which is important given a limited number of access points to/from the M55 in particular at present.

The analysis shows significant delay at junctions is present on the approaches to Preston on the A582, A583, B5254 through Lostock Hall, Tom Benson Way, A59 (both east and west of Preston) and A6 (both north and south of Preston). It is also notable that the Eastway / A6 junction south of M55 J1 experiences delay as does Lightfoot Lane in 2014 as well as the M6 between J29 and J31a.

Access to the strategic road network is subject to particularly high levels of demand, and present delay. Queues are present in the morning and evening peaks on the approaches to the M55 J1 in particular, and this junction provides strategic access to the north of Preston via the A6 but the current level of demand is causing congestion on both M55 J1 and the A6.

Given that the traffic situation around M55 Junction 1 has changed with the new Broughton Bypass opened in 2018 a further analysis of the traffic delays has been undertaken using the observed 2018 journey time data. The results show that the average speeds decrease in the AM and PM peak periods compared to the inter-peak period.

Figure 3-I displays the two analysed journey time routes, which are both split into a number of segments.



Figure 3-I: 2018 Observed Journey Time Routes

As shown in Figure 3-J along the east-west route when travelling from Eastway to Tom Benson Way, average speeds drop dramatically during the AM and PM peak periods compared to the IP period. Of particular concern is the average speed dropping below 10 mph between points 3 and 4 during the AM and PM peak periods.