

**NW TAR CORE GROUP**

**Convenor:**

**LILLIAN BURNS**

**Members:**

**DAVID BUTLER**

CTC regional councillor

**PETER COLLEY**

Federation of Cumbrian  
Amenity Societies/ NW ACTs  
Friends of the Lake District

**JANET CUFF**

Ramblers Association/ CPRE

**ADRIAN DUNNING**

NW Association of Civic Trusts

**SANDRA DUTSON**

NW TAR Treasurer/ Road Peace

**Campaigns Co-ordinator**

Friends of the Earth

**Development Officer**

Greater Manchester  
Transport Resource Unit

Mr. David Clark & Mr. Bryan Randles,  
Highways Agency,  
710, City Tower,  
Piccadilly Plaza,  
Manchester, M1 4BE.

Wednesday, December 16<sup>th</sup>, 2009

Dear David and Bryan,

**A556 IMPROVEMENT BETWEEN M6 JUNCTION 19 AND M56 JUNCTION 7:  
Supplementary consultation on M6 J19 to Mere Hall – joint NW TAR/CPRE response**

Please note that this response to the Highways Agency's (HAs) latest consultation on the A556 is a joint one on behalf of the North West Transport Activists Roundtable (NW TAR) and the Campaign to Protect Rural England (CPRE).

The NW TAR is one of eight regional roundtables that were established 10 years ago under the auspices of the Campaign for Better Transport (formerly Transport 2000). The transport roundtables are voluntary alliances which represent many non-governmental organisations. We lobby for sustainable transport outcomes, sustainable land use, a low carbon future and healthy lives.

CPRE is a charity that was established 80 years ago. It promotes the beauty, tranquillity and diversity of rural England by advocating the sustainable use of land and other natural resources in town and country. Its patron is the Queen.

For clarity, NW TAR and CPRE would like to re-iterate their previously-held positions in relation to the A556 'Improvement'. We remain objectors to the current HA plans for this trunk road. We would also point out that the plans do not concur with the instructions given by a previous Secretary of State for Transport, Alistair Darling, who directed the Highways Agency to drop proposals to build an A556 (M) and to come forward with an on-line scheme for the A556. We subscribe to the findings of the government's former leading independent advisers on trunk roads – SACTRA (the Standing Advisory Committee on Trunk Road Assessment) - who proved that providing more highway capacity merely encourages more traffic movements<sup>1</sup> and also that, in a mature economy such as that which exists in the UK, there is no automatic connection between providing new transport infrastructure and economic benefit<sup>2</sup>. SACTRA's findings on both fronts were accepted by the government.

<sup>1</sup> Trunk Roads and the Generation of Traffic, SACTRA, 1994

<sup>2</sup> Trunk Roads and the Economy, SACTRA, 1998

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As we do not support the present proposals to "improve" the A556, which have increasingly veered off-line in recent years, it follows that we therefore do not support either of the options offered in the latest consultation which merely represent different versions of what has increasingly become a bypass to the

section of the A556 in question, rather than an improvement to the existing road. As High Legh Parish Council comment to you in their response to this consultation, the options tabled are increasingly beginning to resemble the A556 (M) proposals and land-take implications are becoming ever greater.

We note that High Legh P.C. are beginning to support the idea of making improvements to the M6 junctions 20/ 20A and their interconnection with M56 junction 9, which was the position that CPRE took at the time the HA were promoting the A556 (M). The junction arrangements in that area were very badly (and confusingly) designed and would not be approved today. However, when the HA – for the purposes of comparison with the A556 (M) scheme – drew up an alternative junction 20/20A arrangement, they did so in such an over-engineered and land-hungry way that the Transport Secretary deemed it poor value for money. There was what can only be described as a cynical approach taken by the HA at the time to the two alternatives. The A556 (M) proposal was worked up in some detail, tightly drawn and costed but the junction 20/20A scheme was lavishly designed and landscaped in a manner which made it financially unacceptable. We feel certain that there is a more modest junction improvement scheme that could be carried out here which would make the use of this junction more attractive to more traffic. (An advantage of focusing more spending on this than on the A556 is that the motorway junction improvement would be funded from the HA's national schemes 'pot' – because the M6 and M56 are national transport corridors - whereas the current proposal would be dependent on the hugely over-budgeted Regional Funding Allocation money as the A556 is classed as being of regional importance).

Along with a re-design of junction 20/20A, there should still be on-line improvements to the A556, but these should not be of the scale presently proposed and, along with them, complementary measures such as those recommended by the MIDMAN Study should be enacted in order to bring about modal shift. The MIDMAN multi-modal study final report suggested that a parkway station should be built somewhere near where the Mid Cheshire railway line crosses the M6 where motorists heading to Manchester from West Cheshire and from north and south on the M6 could park up and mount an improved heavy rail service into the city. In addition, the study report suggested that the existing Metrolink service could be extended out to the same point. But these excellent proposals – by consortia of top consultants - were not even taken so far as a feasibility study by either the Passenger Transport Executive or the highways authorities – and yet they have the potential to remove many thousands of car movements from the A556. As a minimum, this proposal deserves investigation before more highway capacity is considered, let alone provided. Since the Integrated Transport White Paper heralded a new dawn in transport thinking a dozen years ago, road building is supposed to be the last option considered, not the first.

The current plans would severely diminish the value of the wider landscape and environment and remove valuable agricultural and Green Belt land. We also note and in the main agree with the comments which Tabley Parish Council have sent to you pointing out the very local repercussions of the latest variances proposed to the part of the A556 that runs between M6 junction 19 and Mere Hall. These, as they say, extend not only to traffic movement problems in the local area, but also to severance issues and other detrimental impacts on the community and on wildlife. And, in addition to their comments, we would point up that the HA proposals would have negative impacts on public rights of way and on cycle routes.

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We would suggest that the whole approach to dealing with the problems of the A556 (and we recognise that there are problems) is out-dated. It needs reviewing in the light of current government thinking.

Since work commenced on the latest A556 Improvement scheme, there have been major developments:-

- i. Climate change evidence has become far more persuasive and has been accepted by the UK government. The Climate Change Act calls for a reduction in greenhouse gas emissions across the UK by 34% by 2022 and 80% by 2050, based on 1990 levels. (NB. Increased emissions from some traffic travelling a few miles further in order to interconnect between the M6 and M56 instead of using the A556 would be offset by the fact that it could maintain a steady pace instead of having to stop and start at roundabouts and traffic lights on the A556 – not to mention the impact which the speed cameras have on emissions).
- ii. The Department for Transport (DfT) has published two command papers relating to transport: 'Towards a Sustainable Transport System' (TaSTS) and 'Delivering a Sustainable Transport System (DaSTS). Both emphasise the need to significantly reduce harmful emissions for transport to contribute to reducing carbon emissions specifically.
- iii. The DfT has issued new Wider Economic Benefit Transport Appraisal Guidance (WebTAG) that now requires project promoters to prepare 'Option Assessment Reports' setting out the need for intervention, the range of possible interventions and identification of the options to be taken forward for further analysis. And, for schemes such as this one (costing more than £20m) promoters must prepare a separate 'appraisal specification report' clarifying the methodology for further appraisal on the better-performing options. (This approach has not been taken with this scheme because it evolved from the 'predict and provide' era). In addition, new WebTAG guidance for climate change is in the process of being reviewed.
- iv. The legal framework, command document and guidance all sit within the UK's Guiding Principles of Sustainable Development: living within environmental limits, ensuring a strong, healthy and just society, achieving a sustainable economy, using sound science responsibly and promoting good governance. These have evolved and been refined since a road-building solution to A556 problems first emerged.
- v. Amongst the key principles in the North West of England Plan: the Regional Spatial Strategy to 2021 are:
  - Making better use of existing resources and infrastructure (Policy DP4) and
  - Reducing the need to travel, managing travel demand and increasing accessibility (Policy DP5)

The RSS is now a statutory instrument, but the A556 plans do not comply with it.

- vi. Finally, there has been increasing evidence in recent times, supported by government, of the potential positive impacts that can be achieved from a range of softer measures or 'smart choices'. However, these do not appear to have been taken into account in this instance and they should have been.

The currently proposed 'improvement' scheme for the A556 does not stand up to scrutiny, is not sustainable and should be re-appraised from first principles with a more enlightened approach adopted.

Yours sincerely,

**LILLIAN BURNS**

Convenor, North West Transport Roundtable/ CPRE North West Regional Group