



Our ref: CBO-0049-007

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BY EMAIL & POST

Ms Katheryn Powell
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Dear Ms Powell

22nd February 2012

A556 KNUTSFORD TO BOWDEN ENVIRONMENTAL IMPROVEMENT

We wish to bring to your attention matters on the pre-application consultation that the Highways Agency is currently undertaking on the above scheme. We represent Millington Parish Council, the Millington and Tatton Estates and the A556 Lobby Group. The proposed scheme runs for some considerable length through land owned by the Millington and Tatton Estates and many people in Millington would be directly affected due to the proximity of their properties to the proposed road.

The pre-application was formerly commenced on 23rd January 2012 and is due to run for 12 weeks.

We appreciate at this stage in the process the IPC plays no part in the process of consulting on schemes. In this case it is for the Highways Agency to determine what is an appropriate level and form of pre-application public consultation and then demonstrate to you the adequacy of the consultation when they make the application for the scheme. We are in regular contact with the Highways Agency and as you will see have copied this letter to them and Cheshire East, the local planning authority. However, we believe it is important that you are made aware now of some of the details of the consultation process as at best it leaves much to be desired and at worst could be construed as deliberately misleading.

The amended preferred route for the scheme was announced in March 2010. This showed a road alignment similar to that which is now being proposed but indicated that there would only be one junction along the route, at its intersection with the A50. More details of the scheme emerged in the second half of last year which were shared with Millington Parish Council. The scheme now included two junctions along the route, one of which was at Millington, effectively in the heart of this ancient Parish.

The residents of Millington raised concerns over this change to the proposed scheme with their MP George Osborne and he asked the Highways Agency to look at options for different junction arrangements. Our Clients welcomed this intervention.

The Highways Agency is now using the pre-application public consultation process to present and consult on junction options with the wider public. Despite repeated requests, no attempt was made to discuss these junction option proposals first with people directly affected by them, such as our Clients. The Highways Agency has subsequently put forward 4 different junction options and, within

3 of these options, there are 3 sub options. The public is therefore being asked to consider and express a preference for one of 10 possible options. This we believe is unnecessarily complicated, potentially deliberately so.

It is clear from the information provided that a lot of detailed work has been undertaken on the scheme that includes the junction at Millington, which the Highways Agency are referring to as the baseline scheme. It is also clear that very little work has been undertaken on the other options. This is evidenced by the documents provided to date through the public consultation, with a 40 page Scheme Assessment Report and a 152 page Preliminary Environmental Report dedicated to the baseline scheme compared to only a 19 page Junction Options Comparative Assessment Report discussing all the 9 alternative junction options. It includes comments such as “this comparative assessment has been prepared in a short time, with limited opportunity to optimise the layouts of each alternative option” and “the assessment has also been carried out to a lesser standard of detail”. It would appear the Highways Agency was gearing up to consult on the baseline scheme before George Osborne asked them to look at other options. The pre-application process was then rapidly changed to be a consultation on options, and commenced before the work was close to completion.

By presenting so many potential options it is highly unlikely that the Highways Agency will be able to determine a preference within the wider public for one or other of the options. This we suspect will make it easier for them to conclude that the baseline scheme (the one they have done all the work on) is the one to pursue.

We question therefore whether this is a genuine Consultation on Options and whether in running the pre-application consultation in this way the Highways Agency are failing to properly consult on any scheme.

The information has been presented to the public in two forms. There is high level and relatively schematic information aimed at the wider public and more detailed information only available by attendance in person or by request – the Highways Agency are making a not insignificant charge for some of this information.

The diagrams in the high level information packs are misleading in the context of Millington. The locations of other villages are shown on the diagrams and the broad locations of buildings in these villages are also shown. This includes property which is on the existing route of the A556 – a major part of the Highways Agency’s case is the relief offered to these properties as a result of the scheme.

Millington however is not shown on the diagrams and there is no indication that there is any property in the vicinity of the scheme in this location. This is very misleading to anyone unfamiliar with the area and would obviously lead someone towards the conclusion that Millington was a good place to locate the road and a junction.

There are also inconsistencies between the engineering drawings and these schematic consultation plans in terms of the location of cuttings and embankments. On the south side of Millington the road is shown to be in cutting in the schematic consultation plans when in fact it is on embankment. For the audience these schematic plans are intended for, whether the road is in cutting or embankment is an absolutely key consideration. We have therefore enclosed a plan showing these discrepancies.

On the basis of the above we believe this high level consultation material is fundamentally flawed. Whilst the correct and accurate information is on display for the small minority who have the time, skills and inclination to look for it, only the high level material is being distributed widely including

local councils and the press and readers are being asked to support the scheme and identify a preferred option on the strength of the information included within it.

The detailed technical supporting information is also inadequate. There are key documents missing that are fundamental to professionals such as ourselves gaining a proper understanding of the impact of the road. These were requested from the Highways Agency during the first week of the Consultation (on the 25th January), however they were only made available this week, four and a half weeks into the consultation process. In addition, the documents that are provided state that the traffic modelling for the scheme is being updated, so they will quickly be superseded.

To date The Millington and Tatton Estates and to our knowledge the other adjoining land owners have not been consulted over the necessary Compulsory Purchase of their land. We had understood this should have happened before the commencement of the public consultation.

In summary therefore we consider the pre-application consultation process to be flawed and would ask that you make your own investigation now or as early as you are able within the process. Our clients may seek a legal opinion before the end of the Consultation.

Notwithstanding this, the outcome of the consultation and in due course your own opinion of the adequacy of the process is it clear that our clients, residents and landowners directly affected by the scheme, have not yet had the opportunity to properly understand or be advised on the impact of the scheme that is eventually proposed. In this context we cannot urge more strongly that the Highways Agency start to liaise closely with our clients post pre-application consultation right through to making the application itself. If they fail to do so there should be no doubt that they will have failed to consult properly.

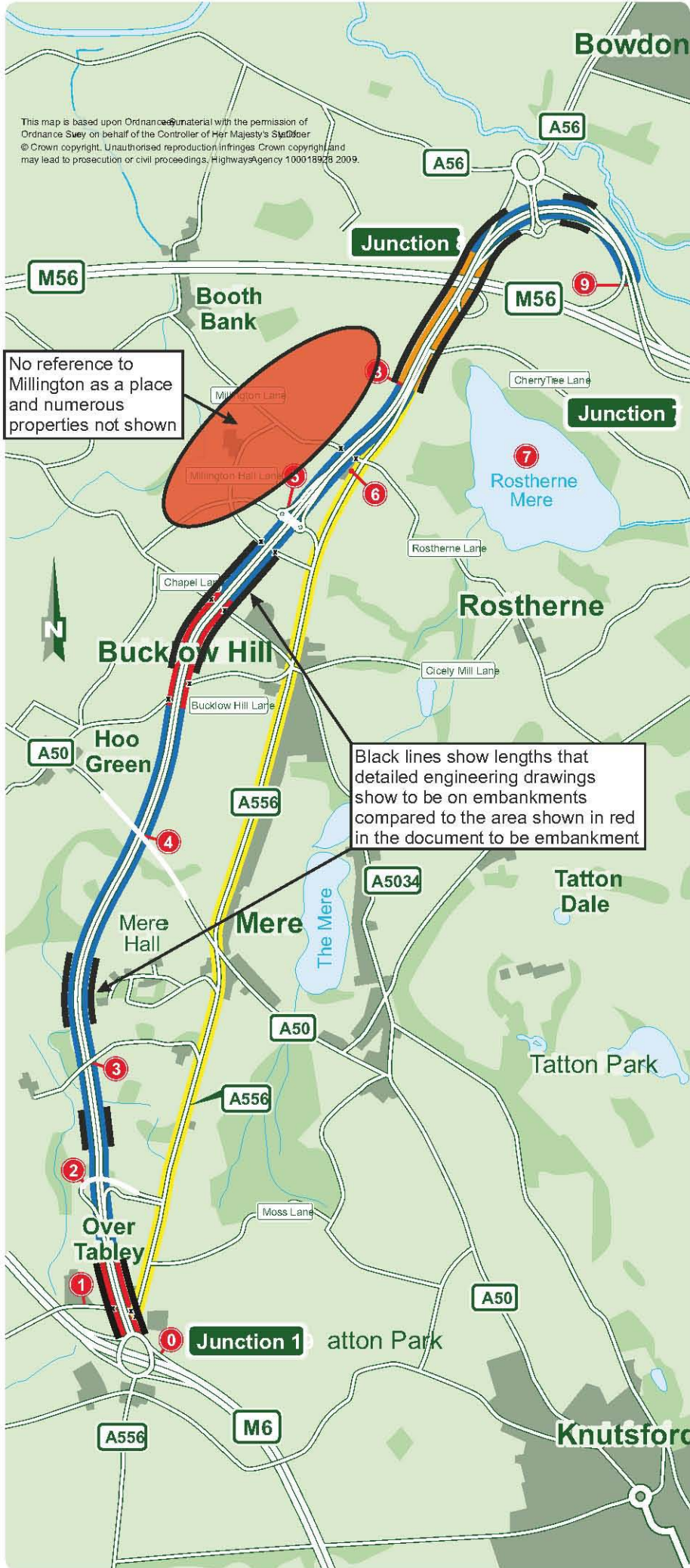
If you require any further information do not hesitate to contact us.

Yours sincerely

PAUL CORBETT MEng CEng MICE MIHT
Director
CBO Transport Ltd

On Behalf of:
Millington Parish Council
The Trustees of the Millington Estate
The Tatton Estate

Cc Highways Agency (email only)
Highways Agency (email only)
Highways Agency (email only)
Cheshire East Council
Millington Estate (email only)
Millington Parish Council (email only)



Cuttings and embankments

The new A556 would be mostly in cuttings below existing ground level. We have introduced these cuttings where possible to minimise the adverse appearance and noise from the new A556. In certain areas, where shallow cuttings or embankments are unavoidable, we plan to create raised earth mounds next to the road to reduce the adverse impacts. The locations of the cuttings (≡) and embankments (≡) are shown on the diagram. More detailed plans can be found in the Preliminary Environmental Information.

De-trunking (≡) of the bypassed section of the A556. The new A556 would bypass the current route of the A556 between M6 Junction 19 (0) and the connection between the offline and online sections (8). Where this happens, the current road would move from the control of the Highways Agency. It would become the responsibility of Cheshire East Council as the local highway authority. This process is called 'de-trunking'. As the A556 scheme would take the majority of traffic away from this de-trunked section, we intend to carry out works to reflect this reduced use. These works would also make the de-trunked road more suitable for use by people making local journeys and for non-motorised traffic. The only accesses to the new A556 from the de-trunked road in the baseline scheme design would be through the Tabley and Millington Junctions. The existing connection with M6 Junction 19 would be removed. You can find more information about the proposals for the de-trunking works on the following pages.