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12th April 2012

Ms Kathryn Powell – Case Leader
IPC
Temple Quay House
Temple Quay
Bristol. BS1 6PN

Dear Ms Powell

Re: A556 "Environmental Improvement" Scheme.

I am a resident of Millington and write to register my objection to the potentially catastrophic proposal currently being progressed by the Highways Agency (HA), Jacobs and sponsored by a variety of influential pressure groups. I write this letter having availed myself of all available information on offer, both from the public consultation and my own research. I hope my personal knowledge of the local environment, infrastructure and experience of traffic flow under all conditions will be of value to you.

I object to many aspects of the process and logic that has led to the latest incarnation of the A 556 bypass, but my reason for writing this objection to the current scheme, is the inevitable negative impact to safety on the lanes of Millington. I have primary concern for vehicles encouraged onto our lanes that have no knowledge or experience of their nature or dangers. Of course existing users of the lanes should be considered, as should the vast number of tourists who currently use the lanes on bike, horse and foot.

I have begun independent research to identify the current usage of the lanes, by all forms of transport. The issue of modelled traffic numbers is central to the argument for and against the most current proposal.

The Highways Agency have produced and published traffic modelling data which states current usage as 150-250 vehicles per day, average.

They forecast this figure to grow, without the new road scheme, to 1500 vehicles.

Q.E.D. The 3,000 vehicles associated with the scheme could be accommodated by the lanes surrounding Millington Junction, safely.

I refute all these assumptions.

I have conducted early surveys of traffic flow through the parish of Millington, to add additional evidence for my objections here, but will be continuing to collect data over the next 6 months to produce a reasonable research document.

Having chosen the Saturn Model and rejected any other form of statistical tool or data collection, the HA also chose to reject the number of vehicles the model predicts currently use the lanes. No evidence has been made public to substantiate the prediction that if left, current usage will grow to 1,500 vehicles a day. This figure is either derived from a multiple, ten X 150 or perhaps more likely, half of 3,000. It has no basis in fact according to my own observations and I have no choice but to consider it as a convenient speculation, providing scale to their final assertion. In order to deliver additional environmental benefits to a proportion of residents, beyond those already proposed up until 2009, a new off line section and junction in Millington is championed.

The HA maintain that 3,000 vehicles on average could use the lanes surrounding and throughout the parish of Millington, safely. I believe my evidence of existing usage and records of the current numbers of accidents provide a more compelling argument to the contrary. Current samples in my research indicate the lanes to be used by three groups;

- 1 Cars. 42% of users. Made up predominately of local residents, reasons for journey being the commute to work, schools and shops.
- 2 Bicycles. 35% of users. This extraordinary figure is the result of the lanes' close proximity to large urban areas and Millington "having the only decent hill for miles around".
- 3 Commercial. 15% of users. Including farm vehicles and vans in roughly equal numbers. The remainder of the samples is made up of foot and horse users.

During a recent 3 hour sample (9.30am -12.30pm, weekend), which included 125 users of all types, the only non locals to use the lane were cyclists and the postman!

My early surveys demonstrate the harmony between the current number of residents, very unlikely to increase significantly over time, local agricultural business, definitely fixed in number and leisure users. As the numbers of cyclists continue to swell, at all times during the day and week, locals feel the safety on our lanes may already be compromised, leading some to ask for the speed limit on the lanes to be reduced from the National Speed Limit to 30mph.

These same samples indicate some deficiency in the Saturn Model, in describing traffic in Millington, however the scale of motorised vehicle movements is far more accurate in this model than in the HA's suggested figure and there is no evidence to suggest or characteristic of the traffic to indicate, that these numbers or proportions will change significantly over time, other than to highlight the possibility of cyclists eventually outnumbering all other users. Should the proposed scheme progress, the usage of the lanes would be dramatically transformed with at least 90% of users being motorised vehicles and 95% non-locals. I am not an expert on the Saturn Model and can only speculate on the maximum volumes which it predicts for rush hour if the scheme progresses, however, basic statistics requires it to include samples in the order of 1,000 vehicles an hour and even this number only represents a tiny fraction, some 3%, of the number of vehicles that will have the daily option to use the junction, if they wish or the need arises. It is however a fact that currently less than 20 cars per hour use the lanes on average. I assert that it is exactly this maximum variance in user numbers that should have been used to establish the effect on safety, particularly if you combine the number by type, commuters without local knowledge.

The section of road passing through our village and the associated Millington Junction have been devised post consultation in 2009. There is the inevitable suspicion that this new section of road and all consequences of it are to dissipate some other irritant to the scheme and in fact, to further enhance the benefits of the scheme for residents in another community. The HA state in their consultation documents that the first objective of this new section of road and junction is to further relieve traffic from the A50 and A5034, again it is stated in HA documents that the further extension off line is as a consequence of public consultation with the residents of this community.

There can be no doubt that the purpose of the new section of road is to ensure that nearly 3,000 cars per day on average are extracted from current infrastructure, designed to carry this volume of traffic and deliver it to an infrastructure that not only cannot cope but is in fact prohibitive to such an extent that the most serious consequences must be factored into the judgement. I am shocked that an agency, charged with considering their actions in light of safety above all other considerations could possibly conceive this as a solution, there is no available detail as to what could be gained other than the spread of traffic from A roads to country lanes.

I feel my single most important task is to convey the nature of the lanes in question and why my assertion that the consequences I fear most, are inevitable. Regardless of the very low numbers of users currently, the lanes still experience significant accidents, notably involving vehicles using the lanes as "rat runs" normally when bad weather has created blockages on the surrounding roads. It is not an exaggeration to state that the lanes are impossible to negotiate in anything other than a vehicle designed for the purpose when affected by bad weather.

The aspects which contribute to the issue include; a significant proportion of the lanes are single track, none include drainage, street lighting, cats eyes or pavements, road markings are very rare and I have never known the lanes be gritted or prepared in any way for winter.

All lanes have been created post field enclosure and are therefore characterised by 90 degree bends and high hedgerows. Millington includes the highest point for some considerable distance and this topography, combined with the funnelling effect of the M56 which passes along one border, to weather from the West, provides some extraordinary conditions that cannot be ignored, this was demonstrated most dramatically in the March 2010 when the motorway and road systems on all three sides of the village gridlocked in 10 minutes due to a sharp change in temperature, prompting BBC Radio 2's Sally Traffic to comment that in her 15 years she had never experienced such an "apocalyptic" traffic event. She was describing an area best visualised as a triangle in the middle of which sits Millington.

There is a danger that too thorough an explanation of the lane's limitations would be counterproductive. One example is typical, there is a bend on Chapel Lane known by all residents as "the bad bend", located within yards of the new feeder road described on all options.

Throughout consultation there has been repeated stand offs between residents and Highways focused on this particular bend. To residents, it serves to highlight our concern, we call it the bad bend and it is directly in line with all and any traffic increase that will occur as a consequence of the junction, but the HA disagrees. It has a tricky slope, nasty double bend (in the same direction) and stream at the bottom making it more liable to freezing fog. I presume the agency believed these features have resulted in the bend "winning" its title, I'm not surprised we were never asked. This however is not the case, in fact, there is not a single route to the junction which does not contain multiple examples of similar bends and in each case at least one which is single track. The bend is described as the bad bend because it is most likely to catch out non locals, the 200yds of road leading to and from the bend has central markings on the road, which lead the uninitiated to consider it a normal unlit bend on a slope, it is not, the accidents that have occurred on this bend are a matter of record. Under certain weather conditions and without the benefit of 4 wheel drive it is impassable, safely.

Due to the massive increase in average traffic numbers predicted along Chapel Lane, abhorrent in itself, little has been said regarding the maximum numbers of traffic that can be expected at rush hour and similarly the consequence of traffic moving along any route other than the additional link road. For example, if bad weather affects flow on the main commuter route, forcing traffic down single track roads and it must be pointed out that if the new feeder road does block, for example ON THE BAD BEND, then all traffic will be forced to use the only alternative. This is Millington Hall Lane, also sloping but genuinely single track, down to single car and winding, many residents never use this lane in a vehicle, regardless of light and weather, but we don't bother to give it an extra name we just avoid it!

Whilst the multiple options presented alongside the baseline scheme should indicate the reservations the HA themselves feel about trying to promote a route and plan containing this obvious flaw, I still have some doubts whether this is to protect their primary motive, to get the road built within a specified time frame or in belated recognition of the safety issue I have highlighted. They have, throughout consultation, maintained that the lanes could carry the volumes proposed. They therefore prefer to employ brinkmanship to the detriment of my community, we are terrorised by the prospect of what could follow and have openly expressed these concerns to the Agency. Is it not then, no less than torture to continue to affirm that there is every possibility that the scheme will proceed unchanged and unchallenged unless we ourselves

prevent its worst effects? I can in this respect only speak for myself but I object to this complete abuse of process and power, this revision should never have been approved by the agency because it can provide no benefit, on any scale, which justifies its consequence. In my opinion, the consultation process has been from inception, an exercise in trying to minimise possible fallout created by Millington Junction, I have numerous examples of insidious and inappropriate spin attached to the plans and description of the scheme. I presume they are as obvious to you as they were to the people whose homes were not represented on the consultation documents. There is one example which I do feel is worthy of mention. The parish of Millington wasn't noted, depicted or represented in any way, only its lanes shown at larger than actual scale. To extend this road into Millington so as to position a junction off line, has already caused the HA to obliterate my parish from the map, I have no doubt that the omission of our existence will prove equally handy should the consequence of this proposal ever be recorded. I found out only recently, to my own shame, that Millington is cited in the Domesday Book. I must inform you they wish quite literally to transform my village into a road junction, a thousand years of history obliterated, no longer a parish and dissected as a community, yet I would prefer to have the name die than only be associated with a road which should have, literally, passed us by. We are fortunate to have RT Hon George Osborne as our local MP, not because of his obvious notoriety but rather, as a consequence of our concern, he has visited the lanes himself, something I am equally sure our representative on local government, has not, he endorses the baseline option. It is quite impossible to see the lanes in question and not share our concern, as Mr Osborne did prior to public consultation and I will ask him to confirm that the issue is as I describe it.

I have alluded to the fact the HA have presented the scheme with several options which do not include the junction. We pray that if a scheme is progressed it will not include the Millington Junction. This then begs the question, why extend the off line section into Millington at all? Whilst we have been presented with a tenuous environmental explanation of how the road could be positioned in Millington, there has been no explanation why it should be, if the junction is abandoned. I have pinpointed the agencies explanation of their decision to extend the off line section through Millington, it relates only to their desire to further enhance the scheme for residents of Mere. The new route is synonymous with the junction but must be objected to independently.

This new off line section, appeared post consultation in 2010. In a public and recorded consultation question and answer session in March 2012, its benefits from an environmental perspective were given by an expert from Jacobs.

It was stated that the route proposed, which does not deviate on any option, was preferred so as to ensure that less water drained onto the adjacent SSSI, than from the existing A556.

It is therefore proposed on environmental grounds, to steal thousands of extra square metres of ancient irreplaceable farm and pasture, cover it in tarmac and furthermore create a new 3-5 acre reservoir to accommodate the resultant drain water. It is simply not credible. It is also unfortunate that so much of the "evidence" on which such experts rely is hidden from the public, indeed it became obvious at public consultation in the parishes of Rostherne as well as Millington that local knowledge on issues such as drainage should be preferred to any expert theory. No landowner whose land was included in the assessment on drainage in Millington was contacted or asked for their opinion, why? I believe the answer is obvious, the issue of drainage was promoted to justify the route so as to accommodate the junction. There is an irrefutable fact, if the road was not off line in Millington an additional issue of drainage would be avoided.

It was graphically illustrated again on the issue of noise that expert opinion cannot be wielded as a means to an end. Our expert promoted noise abatement measures as environmentally beneficial, they more than double the land claim but are required to be able to propose the new off line section. It was confirmed, these structures up to 3.5mtrs above road level will not improve the noise level currently experienced by any residents of Millington, except in the case of a single property.

On the point of detail available to the public, whilst it was confirmed that there would be a 14% decibel increase in noise for those houses closest to the new section, the expert was unable to confirm either the current level of noise experience from the road or any detail that could be used to challenge his conclusion. In his final statement he asserted that the road scheme could be

described as one of Environmental Improvement, if considered as a whole. On the basis of this statement, I attended an environmental walk around the Tabley area, where a second new junction is planned, I can see no justification for the claim of improving the environment there either, Hoo Green, No, Bucklow Hill, No, Rostherne, No. I concede a reduction in noise for the Mere residents but at what price? I have some experience of research and statistics and am unaware of any methodology that could have been applied to the noise data to justify moving the road off line.

It was conceded by the Highways Agency that every scheme has winners and losers and there is sympathy that in this instance Millington is a loser. It is of course a particular strength of the British that we can view difficult decisions in such a way, however, above all else we value fair play. If I am asked to bow for a greater good, I expect the end to justify the means and above all the impact that is to be borne, minimised.

In this case there are no ends, no benefits to the masses only the relentless pursuit of self service by contractors and a small section of a wider community that are being asked to pay too heavy a price. My understanding is that this "average" approach should not be utilised as a measure of utility or benefit, Millington has every right to expect the HA and its agents to minimise the impact and implication of their route on every individual community along the route, it is then for the planning authority to judge the success of their efforts. The HA, ably supported by Jacobs, have done all they could to transfer as much of the total environmental and social impact of the new road on to the single community of Millington.

Finally on the point of the process, I would like to commend the agency for their endeavours to consult with the Parish of Millington during the period of February, March and April, I think there has been a genuine attempt at dialogue and I have had been led to believe that my voice is important to and for the process. If true, then it is to be hoped that any voice of reason will add to the argument.

It is unfortunate that in this case I am at such odds with the HA and whilst I think it my civic and moral duty to make this statement to you I would have preferred that my parish had not been at once seen as a potential scapegoat or easy target. It is a testament to my protestations that so many of my fellow residents have been galvanised to object, in many cases taking on far more onerous tasks than myself in an effort to alter the proposed route of the road. I have at first hand seen a community immediately offer all that they can be to defend what they see to be right and I know the agency are not oblivious to the sincerity of their appeal. I cannot however defend a system that relies upon the abilities of inexperienced residents to meet this challenge.

I repeat my accusations that lobbying has pressed this route through Millington regardless of the obvious flaws in the proposal, I find it more than regrettable that up to the point of consultation there has been duplicity in the HA approach. I feel that here has been an obvious "tipping of the scales" to promote the baseline scheme, which has no part to play in the planning of any issue, let alone one which is both vital and threatening. Residents of Millington have then been forced to "fight" on several fronts when presented with ridiculously complex options and have been given reason to believe that unless they assimilate the necessary methodology and procedure, their views and experience can be ignored.

To conclude may I restate, I believe the current proposals for the A556 Bypass should be rejected in their entirety, the inclusion of the new off line section through Millington and associated junction deliver no benefit to justify the resultant reduction in safety or detrimental effect to Millington residents. The route of the current proposal delivers no additional economic benefit to previous routes. The process has been perverted by lobbying and the misuse of the instruments of planning to the point that an unfair consultation has taken place, regardless of the formal interaction.

Yours Faithfully,

Graham Robinson