

To Whom It May Concern:

This represents a submission to the **A556 Knutsford to Bowdon Environmental Improvement Consultation under the Planning Act 2008**

I am objecting to this proposal on the following grounds. Firstly, I argue that the consultation process itself was unfair and not transparent. I also include details of where I believe the information provided was flawed and incomplete, which made the consultation unbalanced and invalid.

I am asking the Highways Agency to withdraw the consultation, and the IPC to request that the consultation is withdrawn and rerun.

Consultation process

The public consultation ending 16th April 2012 has not been a consultation on a specific scheme but on a series of options for the junction arrangements on a scheme. There was no meaningful comparison with other potential options, (such as an improved M6 Junction 20) but only brief discussion of their disadvantages.

The Highways Agency will submit a recommended route to the IPC after 16th April, but members of the public will not have the chance to be consulted on this choice. This means the public will be unaware of the choice of route the Highways Agency will submit. **I contend that in this respect the consultation is not fair or open.**

Secondly full information on the alternative options was not included on the consultation library or at events and was therefore not publicly available. I have included specific examples of this in the sections below (See safety, environment) but these are by no means exhaustive and others could have been added.

I was unable to make an informed decision, and contend that in this respect the consultation is flawed and illegitimate.

The Highways Agency's own website states "The existing road is mainly single four-lane carriageway, and suffers from congestion, variable journey times and a poor accident record. It also has negative impacts on the local environment."

<http://www.highways.gov.uk/roads/33802.aspx>

I contend that the information provided during the consultation does not prove that the new proposed scheme would alleviate any of these problems. The following areas illustrate my point.

Congestion

I was unable to make an informed decision whether the new scheme (and its options) will be an environmental improvement in terms of reducing congestion. This is because there are no junction capacity assessments presented of the impact of the scheme at the M6 J19 roundabout or the proposed / modified roundabouts at the Millington junction and M56 J7. Where regular congestion *already* occurs at the M56 J7 merge this is not reflected in the Highways Agency's own data.

Furthermore, if more traffic is attracted to the new route as the Highways Agency states in the DMRB will occur, it is probable if not certain that this will increase congestion at Junction 19 M6 because while "the existing 'free-flow' left turn lane for A556 southbound to M6 southbound travel would be maintained with the new A556" (public consultation summary document, pg.8) there are no improvements indicated

for the northbound traffic at J19 which will still be required to navigate a roundabout with several sets of traffic lights.

The Highways Agency states “On completion of the proposed new A556 road, to improve management of traffic flows, we are also looking at possible improvements to the M6 to the south of Junction 19 and to the M56 to the east of Junction 7.” (Public consultation summary document, pg.3)

The document then goes on to state “We are not required to obtain development consent from the IPC for these works, as they would be carried out within the existing highway boundary. For this reason these works would not be included in the application to the IPC, and so do not form part of this consultation.”

I argue that this information is therefore irrelevant to this consultation but gives members of the public the distinct impression that the latter projects are a consequence of, and dependent on the former, which may unduly influence respondents to favour the Highways Agency’s choice.

Safety - Millington Hall Lane link road to Chapel Lane

The baseline option (which is Highways Agency’s preferred option) sees a new link road and junction at Millington Hall Lane leading to Chapel Lane. Both Chapel Lane and the nearby Peacock Lane are narrow country lanes and without middle line markings. The proposed Millington Hall Lane link road to Chapel Lane will be sited only yards from the most dangerous bend in the area, not actually wide enough for two vehicles to pass one another; unless one vehicle mounts the kerb/hedgerow. These lanes are crossed by public rights of way and the lanes form part of a popular well-known cycle route. There is also a nearby primary school situated on Wrenshot Lane.

The Highways Agency claim the new road will improve safety for nearby residents; but no information was provided during the consultation on traffic flows, speeds and delay in relation to the local roads linking to the scheme such as Millington Hall Lane and Peacock Lane. There is also no data on flows in the wider High Legh area where these local roads connect to the A50 or A56.

Users wishing to access the new route via the proposed Millington junction must access it by way of these local country lanes, and it is inevitable that a rise in vehicles, including heavy goods vehicles, using these lanes to access the junction will occur, because the baseline option (which is Highways Agency’s preferred option) does not allow access from the A50 for traffic travelling along the A50 from Warrington direction. Inevitably they will seek to ‘cut the corner’ by cutting down roads such as Chapel Lane, Wrenshot Lane and others to reach the new junction.

Therefore it is probable residents on Chapel Lane and surrounding lanes in High Legh will see a significant increase in vehicles using country lanes to reach the proposed new junction at Millington. These are minor roads which are not suitable in terms of safety or capacity to connect into the national strategic road network. As the Highways Agency has not indicated any improvements to these roads to address safety or capacity issues higher accidents, delays and congestion are highly likely.

I contend that the data available in the consultation documents does not adequately reflect these risks and therefore make the consultation flawed.

Environment (Ecology)

On the Highways Agency site, the consultation library contains ecological surveys carried out, which are available at:

http://iprojects.costain.com/A556_Public_Enquiry/Contents.htm

The current Highways Agency public consultation asked interested parties to consider a number of alternative design options, and refers them to supporting documentation to assist their selection. One of these is the Junctions Options Assessment report (JCA).

The Junctions Options Assessment attempted to compare the different ecological impacts of the alternative designs proposed during the public consultation. This stated that data was taken from 2011 environmental surveys “where relevant” but it is not possible to independently assess what these impacts would be because the Highways Agency did not make publicly available any data from 2011 surveys in the consultation library, as they had done for previous years. **Therefore I was unable to make an informed decision, and contend that in this respect the consultation is flawed.**

Again, there was no meaningful comparison with other potential options, (such as an improved M6 Junction 20), and I was not able to adequately assess if these options were more ecologically damaging than the baseline or options in the short/medium/long term or not.

Furthermore, and perhaps more significantly, the JCA admits “This comparative assessment considers the impacts of the five alternative scheme options in relation to the Baseline Design, rather than the existing environment. It is therefore not as detailed or robust as the Environmental Impact Assessment undertaken for the Preliminary Environmental Assessment. A full assessment will need to be undertaken on the selected option, if different from the Baseline Design. (Junctions Options Assessment, pg.14)

I would contend that it is therefore impossible to judge whether an option alternative to the baseline is preferable on environmental grounds if a full assessment is only to be undertaken **after** it has been selected – in other words consultees must make a choice before the evidence is collected. **Again I would argue this makes the consultation flawed and illegitimate.**

Air & Noise Quality

Although the development of any of the designs would see air quality improved for those householders living adjacent to the existing A556, it will undoubtedly see a decline in quality for many others, not just immediately adjacent to the route.

The Junctions Options Assessment report quotes that “Shifting the traffic from the existing Chester Road onto the new A556 alignment would move the main source of air pollution further away from most residential properties. This would improve air quality around these properties, so that no residential properties would be affected by concentrations of pollutants exceeding the upper limits set by European and UK legislation. “(JCA page 30). However, as noted above, there are a significant number of properties in close proximity to the proposed baseline design and alternative designs, which will have significantly reduced air quality (see page 144 of the Preliminary Environmental Assessment January 2012) Furthermore there are only 89 properties exceeding the upper limits set by European and subject to an Air Quality

Management Area (AQMA) so to spend potentially £212 million to address this appears completely disproportionate. In any case, many of these properties were purchased and/or developed after the A556 became a link between the two motorways and therefore the owners cannot have been unaware of their detrimental location, or the likely issues arising from it.

In addition, only 74 properties will experience a net major or moderate noise benefit.

Environment (Climate Change)

It is worth quoting at length a section of the DMRB Stage 3 Scheme Assessment Report (issued Jan 2012 available at <http://www.highways.gov.uk/roads/33802.aspx#docs>)

“There is expected to be an increase in carbon emissions brought about by the increase of traffic encouraged to use the scheme, equating to 85,300 tonnes over the 60 year appraisal period and a disbenefit of -£3.6 million. The increase in carbon has mainly been brought about due to the additional traffic encouraged onto the A556 as a result of the scheme and the overall increase in traffic flow that occurs across the entire model. The new route is also longer and has a higher speed limit than the existing route, which all contribute to higher carbon emissions. This is offset slightly by the reduction of traffic on the M6/M56 equivalent route and on rural links around the scheme.” (pg.35)

I would argue that this conclusion **cannot** be legitimately made because, to restate an earlier point, no junction capacity assessments were provided on the impact of the scheme at the M6 J19 roundabout or the proposed / modified roundabouts at the Millington junction and M56 J7. Plus no information was provided during the consultation on traffic flows, speeds and delay in relation to the local roads linking to the scheme or on flows in the wider High Legh area where these local roads connect to the A50 or A56. It is highly likely there will be **more** congestion than envisaged on such locations, more braking and thus **higher** carbon emissions.

The [Climate Change Act 2008](#) introduced a binding reduction target requiring the UK to reduce its emissions by at least 80% by 2050 against 1990 levels. During the periods from 2008 to 2012, 2013-2017 and 2018-2022 emissions must be reduced (from 1990 levels) by 22%, 28% and 34% respectively.

The UK government has issued its Carbon Plan, which states “Domestic transport accounts for 22% of UK greenhouse gas emissions. The vast majority of this came from road transport, which accounts for 20% of UK greenhouse gas emissions.” (HM Government, Carbon Plan, pg.36)

I contend that this scheme will work against this target as on the Highways Agency’s own admission carbon dioxide emissions will rise.

Value for money

As the project is termed an “Environmental Improvement Scheme” but advantages only a small number of properties in terms of air quality and noise, reduces journey times by an insignificant amount, introduces significant climate change costs and is unclear with regard to whether alternatives are both cheaper and more effective, I would suggest that this does **not** represent value for money in spending approximately £212 million of public money on a new route. As value for money is

one of the 5 sub objectives of the economy objective of the government's new approach to appraisal (NATA) for transport projects, this would suggest the scheme should not go ahead.

I would appreciate it if you would take these points into consideration.

Yours truly,

Philip Martin

[Redacted signature]

Email: [Redacted email address]