



NW
TAR

Transport Activists' Roundtable North West

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Mr. Peter Robottom,
A556 Knutsford- Bowdon Scheme,
The Planning Inspectorate,
Temple Quay House,
2 The Square,
Bristol, BS1 6PN.

Friday, November 29th, 2013

Your ref: TR010002

Dear Mr. Robottom,

HIGHWAYS AGENCY APPLICATION RE. A556 KNUTSFORD-BOWDON SCHEME Interested party ref: 10019087

This submission by the North West Transport Roundtable (NW TAR) follows on from our letter to you of September 27th, 2013, acknowledging your second round of questions, dated September 12th, 2013.

We explained in that letter that we would be able to engage more fully in the public inquiry process once the Highways Agency (HA) had responded to the further queries you posed as a result of issues we raised. Your deadline to them was November 19th but most of their responses were not posted on the public inquiry website until Monday, November 25th, leaving just a few days for an 'interested party' such as ourselves to react to them. Quite apart from this impossibly short time frame, which has meant we have been unable to commission a suitable expert to analyse some of the more technical information, many of the HA's answers to these questions have been less than fulsome, a statement we will attempt to justify.

ExA's ANNEX E RULE 17 LETTER, SEPTEMBER 12TH, 2013

Request no. 5 for: "a copy of the Secretary of State's decision of April 2003 to reject both the A556(M) and M6 Junction 20 schemes and to commission the A556 Route Management Study (RMS)"

The Highways Agency have not supplied you with what you asked for. They have selected a partial quote from the Secretary of State's decision letter. If you would insist on seeing the full announcement it would be apparent to you that what he intended was for them to come forward with an on-line solution.

Request no. 8 for: "details of any 'minor' safety or other traffic management improvements that have been designed or devised but not implemented along the relevant section of the existing A556"

continued ...

The Highways Agency have not supplied you with what you asked for. You requested “*details*” of “*any*” proposed minor improvements. Your question should have unveiled for you the detailed scheme that was worked up for the junction of the A5034 with the A556 which was lodged as a formal planning application some years ago. (It is unclear whether it was approved or withdrawn but it has not been enacted). The HA merely make a passing reference to a ‘Bucklow Hill G turn’ that was not implemented (para. 2.2). The original planning application was not forwarded to you, there was no proper description of the scheme, no illustration of it and no reason was offered for not implementing it.

As the Highways Agency have failed to produce this evidence for you, it is to be hoped that, during your site visit of the area on December 9th, you take the opportunity to venture a little further south on the A556 to Plumley where you will be able to see a turning scheme which is virtually identical to that which was proposed for the A5034/ A556 junction. We would also like to suggest that you ask the HA to explain why this safe type of ‘G turn’ was not effected at the A556 junction with the A5034 (at the Swan Hotel) and that you also ask them to quantify what calculated difference this scheme would have made to road traffic accidents at and near this junction.

For your information, the author of this letter intends to be on the site visit on December 9th, 2013.

Request no. 13 for an up to date WebTAG Economic Appraisal and request no. 14 for an Economic Impact Assessment report

The Highways Agency have not supplied you with what you asked for.

WebTAG Unit 2.8, ‘Wider Impacts and Regeneration’, August 2012 sets out what is required and it begins by cautioning that the Cost Benefit Analysis for schemes “*might not give an accurate or full estimate of the costs and benefits of a scheme*” (para. 1.2.2). In doing so, it quotes from the report ‘Transport and the Economy’ by the Standing Advisory Committee on Trunk Road Assessment (SACTRA). It proceeds to explain in detail what is required of a comprehensive report.

You have been supplied with the Cheshire East Local Impact Report which you surmised might possibly include a proper impact assessment but, as is evident from it, it does not.

At no point in the development of this scheme has the whole rationale for providing significant extra highway capacity been fully reappraised alongside packages of alternatives – either using established methods or using the Department for Transport’s (DfT’s) more recently introduced Early Assessment and Sifting Tool (EAST) Guidance:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/4475/east-guidance.pdf

Nor has a full economic impact assessment/ wider economic appraisal been carried out and neither has a transport business case been prepared.

The Treasury Green Book, which was up-dated in 2011, states in paragraph 1.1:

“no policy, programme or project is adopted without first having the answer to these questions:

- *are there better ways to achieve this objective?*
- *Are there better uses for these resources?”*

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/220541/green_book_complete.pdf

And it goes on to describe how the economic, financial, social and environmental assessments of a policy, programme or project should be combined. This approach was further bolstered with the publication by the DfT of *'The Transport Business Cases'*, (published in 2011 and updated January 2013), which builds on the Green Book approach:

<https://www.gov.uk/government/publications/transport-business-case>

A key point emphasised in all these documents is the need to begin the whole process by first of all identifying the problems and then identifying a series of potential interventions. The potential interventions and alternatives explored should not be confined to roads-only options.

Regrettably, because there has been an A556 scheme in existence in one form or another – as purely a road-based solution – for so very many years, no attempt has been made in recent years to return to first principles and ask the questions: (1) Might there be a better approach? (2) What would be the quantifiable wider economic benefits of the road(s) schemes that are favoured? (3) Do the wider economic benefits of the favoured scheme outweigh the environmental disbenefits?

ExA's ANNEX D

Question 18

It is worth flagging up at this point the response of Transport for Greater Manchester (TfGM) to the ExA's first question no. 18 about light rail and the Mid Cheshire Railway Line. This revealed that no detailed feasibility study has ever been conducted into the recommendation that emerged from the MIDMAN study - that there should be parkway station on the Mid Cheshire Railway Line where car travellers from north and south on the M6 and from West Cheshire and Merseyside could park up and mount an improved heavy rail service into Manchester. The answer from TfGM confirms the lack of in-depth consideration that was given to this proposal and indeed the lack of attention even afforded to precisely what was proposed. TfGM make the statement that this idea would not be viable because of the cost of building another junction on the M6.

It should be noted that the author of this submission served on the MIDMAN Multi-Modal Study steering group throughout the period of its existence and there was never a suggestion that a new motorway junction would be required. Passing between Plumley and Knutsford, the Mid Cheshire line crosses the M6 just a short distance (about half a mile) to the south of Knutsford services which themselves are a short distance to the south of junction 19 (about a further half mile). It was discussed within the MIDMAN Steering Group that motorists could use either junction 19 or the motorway service exits to access a specially built park and ride site which might also service a Metrolink extension. The concept was not developed further within the MIDMAN Steering Group or by the consultants servicing it because it was assumed that TfGM and/or Cheshire County Council (the then highway authority) would conduct a follow-on feasibility study. They never did. Nevertheless, it is well worth noting that TfGM say in their submission to you that they are seriously now considering the proposition of introducing tram trains onto the Mid Cheshire Railway Line, although this might be a few years into the future.

Bearing in mind the drop in traffic growth outlined in the submissions to you by the Campaign for Better Transport, there is in fact some leeway in terms of the passage of years for the introduction of a tram train service on this line – which would promote modal shift on this corridor. On the other hand, the current plan would merely focus more of the traffic that does exist (even if this is less than predicted by the MIDMAN and other studies) onto the A556 corridor. It would also generate new traffic movements (as proved by SACTRA's 'Trunk Roads & the Generation of Traffic') and have no effect on modal shift.

According to the WebTAG criteria that applies currently, the MIDMAN-endorsed alternative and/or the tram-train type of alternative solution to a defined problem merited being fully analysed (TAG Unit 1.1).

Question 19

Further examples of inadequate briefings you have received are the responses you have had supplied in reply to your enquiries trying to establish the cumulative impact of the HS2 scheme and the A556. (You also made a request under **Rule 17, question 1**). The forwarded responses from HS2 Ltd. do not fully address the issues and the Capita map provided, illustrating the alignment of the HS2 railway line in relation to the A556 scheme, is particularly poor (drawing no. 116).

No attempt was made to provide you with a mock-up visual image of the two schemes and it is quite apparent that there has been no environmental appraisal of the cumulative impacts of the two schemes. We would hope that, in view of the fact the two schemes come together on the north west side of a Site of Special Scientific Interest (Rostherne Mere) you would consider this unacceptable.

Revised values for time savings

In November this year, the DfT announced major proposed changes to how transport projects in England are appraised. They are currently consulting on these. Probably the most significant change is a reduction in the value of business travel time savings:

<https://www.gov.uk/government/publications/values-of-travel-time-savings-for-business-travellers>

Values for car travellers have been cut by 20% and for rail passengers by 33%. The new guidance also recommends that sensitivity tests +/-25% be applied to values of time in project appraisals.

Our request to the Examining Authority

We submit that you should consider calling a halt to the inquiry or at least extending the timetable until:

- an environmental assessment is available of the joint impacts of HS2 and the A556 scheme
- a proper (wider) economic appraisal/ business case is available and
- you have received adequate responses to the questions identified

The North West Transport Roundtable had originally envisaged commissioning an in depth analysis of the economic impact assessment/ business case for the A556 but none has been put forward by the HA. Certainly none that meets the wider criteria envisaged by the DfT. However, it is not known whether or not you will insist on receiving the information identified. But, separate from that, there is a need for the most recent traffic data (ie. that which has only just come into the public domain on the Knutsford-Bowdon scheme website) to be appraised along with the previous traffic data. There is also a need to review the scheme applying the revised values for time savings to it. Only four full working days have elapsed since the latest traffic data from the HA has become available. It has not been possible to engage the services of a traffic modelling specialist in that limited time and for them to produce an outcome (although we did try). If the inquiry is to continue on its present timetable, we would like to request that we be allowed two weeks to attempt to present a paper on these issues? We feel we are likely to be able to produce evidence that you would consider very worthwhile to the inquiry. However, we cannot proceed until you pronounce on this. We therefore await your decision. Thank you.
Yours sincerely,

LILLIAN BURNS, Convenor, & **Adrian Dunning**, Core Group Member, NW TAR

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