

**CPRE Cheshire Branch Response to Consultation on M6 Junction 11a to 20 – Draft Route Management Strategy**

Reference	Action Required	Comments
<b>Section 2 - Policy Objectives</b>		
<p><u>Para 2.2:</u> The all inclusive claim is made that:  <i>“These objectives have been agreed by key stakeholders”</i></p>	<p>Remove the first sentence of para. 2.2.</p>	<p>It would be true to say that all the key stakeholders had been consulted on the essence of what have become the policy objectives. It is not accurate to say all have agreed to them as this implies unqualified support. For instance, neither CPRE nor the Transport Activists Roundtables could support Economy Policy EC6 in table 2.1 <i>“To support improved facilities for freight”</i> if this meant building yet more massive warehousing facilities in the Green Belt, disconnected from rail, and which simply encouraged more road-to-road transfer of goods and more road traffic movements. Similarly, Safety Policy SA4 could be interpreted as endorsing the provision of more service areas on green fields. This would be contrary to CPRE policy.</p>
<p><u>Table 2.3:</u> Note important omissions from Environment Policy Objectives</p>	<p>Add two new policy objectives:  <i>“EN5: To work with partners on demand management and reducing the need to travel”</i>                      and  <i>“EN6: To integrate a Strategic Environmental Assessment (SEA) into the RMS process”</i></p>	<p>The DfT and Regional Planning Guidance emphasise the need for good demand management and they, the last two Transport White Papers and Action for Sustainability have as a major principle ‘reducing the need to travel’. EU Directive 2001/42/EC on the assessment of certain plans and programmes on the environment came into force on July 21<sup>st</sup>, 04.</p>

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<b>Reference</b>	<b>Action Required</b>	<b>Comments</b>
<p><u>Table 2.5</u>: The list of partners in IN1 of the Integration Policy Objectives does not include environmental bodies</p>	<p>Add to list of partners:  <i>“statutory environmental bodies and non-governmental environmental organisations”</i></p>	<p>The Highways Agency has a national environmental committee and regional ones in addition to road users committees. ‘Road users’ are acknowledged in this list but not the environmental bodies.</p>
<p><b>Section 3 - Route Functions and Performance</b></p>		
<p><u>Para 3.4, table 3.4</u>: Economy</p>	<p>Delete the following phrase:  <i>“high traffic flows and incidents cause congestion and result in delays”</i></p> <p>Delete the following phrase:  <i>“lack of facilities for freight travelling along the route”</i></p>	<p>High traffic flows do not affect economic function; inability to forecast journey times because of incidents does. This has been exacerbated by an increase in JIT deliveries.</p> <p>It is not accurate to state that there is a lack of facilities along the route. There is a dedicated and signposted truck stop just off junction 20 and other service stations accept HGVs. Freight operators may argue they would like more dedicated facilities but it is incorrect to say there is a lack of them. It is hard to follow why fewer freight facilities than may be desirable has a significant economic impact. Maybe route divergence to off-motorway stopover sites could increase journey times, but this must be marginal. Also, there could be a safety and/or environmental impact if inappropriate layovers for HGVs were provided.</p>

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Para. 3.4, table 3.4: Integration	Remove the word ' <i>can</i> ' from wording under 'strategic functions' and 'regional functions', ie change from " <i>Developments close to the motorway can generate additional traffic</i> " to " <i>Developments close to the motorway generate additional traffic</i> "	Would suggest that developments near to the motorway <i>do</i> generate more traffic, that is invariably a reason for locating them there. ie Gemini, Omega in Warrington.
<b>Section 4 – Land Use &amp; Development Control</b>		
		See comments on Appendix A below
<b>Section 5 – Route Problems and Issues</b>		
		No comments
<b>Section 6 – Route Outcomes</b>		
Para. 6.2, table 6.1 – Route Outcomes	Remove 'Reference G' – " <i>To improve journey times for heavy commercial traffic</i> "	This is already covered by 'Reference E' – " <i>To reduce congestion and improve journey time reliability</i> " and 'Reference J' – " <i>Improve journeys for strategic traffic using the route</i> ". It is unclear why there is a need for specific reference to 'Heavy Commercial Traffic'
<b>Section 7 – Strategy Impact Statement</b>		
Tables 7.1 to 7.3	Insert negative impacts in tables 7.1 to 7.3 inc.	The tables are unbalanced. They should include details of negative impacts of the 'Route Outcomes'

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<b>Section 8 – What Next?</b>		
	Insert references as and where appropriate to separate, tolled, M6 Expressway	If the Government instructs the Highways Agency to proceed with developing the concept of a separate, tolled, M6 Expressway – which it is currently consulting upon – then the potential impacts of this will have to be addressed in the Route Management Strategy as, according to the government’s consultation document on the expressway, it could be delivered within the period of the RMS
<b>Appendix A – Land Use &amp; Development Control Statement</b>		
Para 2.3	Insert the word ‘ <i>sustainable</i> ’ into the phrase: “ <i>The HA needs to implement short and medium term measures to combat congestion</i> ” so that it reads: “ <i>The HA needs to implement sustainable short and medium term measures to combat congestion</i> ”	It is accepted that it can take a “ <i>number of years</i> ” for most measures aimed at reducing congestion to take effect, however any short and medium term measures need to be sustainable themselves or they will add to the problem.
Para 2.4	Change the wording from: “ <i>the HA will discuss with local planning and highway authorities what level of joining traffic can be safely accommodated</i> ” to “ <i>the HA will advise local planning and highway authorities what level of joining traffic can be safely accommodated</i> ”	HA should tell local authorities what level can be accommodated as they have access to route traffic data.

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Table 5.1 – Local Development Plans	Insert Cheshire’s Local Transport Plan and draft waste and minerals plans	Staffordshire’s LTP and waste and mineral plans are listed but not Cheshire’s
Table 9.1 – HA response to planning applications	<p>Page 35 – Change the wording in the third column from:</p> <p><i>“Developments generating strategic traffic will be supported such as warehousing and developments providing national and regional distribution facilities”</i> to: <i>“Developments such as warehousing and developments providing national and regional distribution centres generating strategic traffic will be supported subject to consideration of exit blocking (ref. para. 3.2), motorway traffic capacities and the HA’s biodiversity strategy”</i></p>	This statement, without caveats, is potentially at variance with para 3.2 on access blocking which CPRE supports. Should not be an automatic “will be supported” – this is an unsustainable statement
<b>Appendix B – Route Outcome Tables</b>		
Reference A – Improve Environment	<p>‘Problems and issues’ and ‘Possible Actions’ need to flag up, and tackle, light pollution and vibration and odour from traffic.</p> <p>Also, change  <i>“wildlife affected by the route”</i> to  <i>“accommodate wildlife along the route by reducing environmental severance and maintenance of wildlife corridors”</i>.</p> <p>Also, include in “Possible Actions”:  <i>“Ensure that any design changes minimise additional land take-up”</i></p>	<p>The only type of pollution which appears to be recognised in ‘Reference A’ in the table is air pollution (noise pollution is in ‘Reference B’)</p> <p>‘Possible Action’ to <i>“accommodate wildlife along route”</i> is an objective not action</p> <p>There are no actions to conserve land which CPRE believes is part of EN1</p>

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<b>Reference</b>	<b>Action Required</b>	<b>Comments</b>
Reference B – Reduce Noise	<p>‘Problems and issues’ should include:  <i>“Noise created by volume of traffic and by specific vehicle types”</i> and                      ‘Possible Actions’ should include:  <i>“Investigate potential for reducing causes of traffic noise and collate relevant research”</i></p>	<p>Are the HA party to all relevant research on noise? Is there any more research they could commission? Could the HA’s new incident teams warn owners of noisy vehicles - perhaps at service stations - to take mitigating action?</p>
Reference C – Improve Safety	<p>‘Problems and issues’ should include:  <i>“Poor driving behaviour”</i> and                      ‘Possible Actions’ should include:  <i>“liaison with police forces for better monitoring and enforcement of good driving behaviour”</i> and <i>“installation of cameras to monitor key locations”</i></p> <p>Add to first item, under ‘Problems and issues’ after <i>‘Problems with weaving due to impact of M6 Toll’</i>:  <i>“and service stations”</i></p>	<p>Drivers who constantly change lanes and who do not get over to the slow lane in sufficient time for exiting on motorway slip roads are, as a minimum, guilty of driving without due care and attention and should be cautioned.</p> <p>There are problems with weaving and accidents near service stations but this is not identified</p>
Reference D – Customer Care	<p>Change wording in ‘Possible Actions’ to:  <i>“provide additional facilities for freight, particularly secure overnight parking within all service areas”</i></p>	<p>Recent Planning Inquiries have concluded that sufficient service areas exist to provide the necessary facilities. However, if the case is subsequently proved that there is a need and existing service areas are inadequate, then the sequential process outlined in Regional Planning Guidance must apply to the use of land. It would be inappropriate to take greenfield land for this purpose.</p>

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Reference E – Reduce Congestion	‘Possible Actions’ should include: <i>“work with partners on demand management issues and reducing the need to travel”</i> which is proposed above (in ‘action required’ on table 2.3) as new ‘Environmental Policy Objective’ EN 5.	This Outcome Table focuses on managing congestion; there is no reference to the government’s emphasis on the need for better demand management, more green travel plans and on reducing the need to travel.
Reference F – Development Control	‘Possible Actions’ should include: <i>“provide easy public access, preferably on-line, to the HA’s data on traffic flows, analysis and major reports”</i>	CPRE would suggest that a more pro-active stance is needed in dealings with development agencies, local authorities and the public. Currently it appears that detailed information is only forthcoming when development plans or planning applications are in the process of consultation.
Reference G – Heavy Goods Vehicle/Commercial Traffic	‘Possible Actions’ should include: <i>“to encourage the use of service areas for parking and lay-overs and to encourage local authorities to find suitable brownfield areas where trailers can be swapped”</i>	Accept the difficulty with these in lay-by’s but would suggest that this because of the nature of such locations.
Reference H – Improve Incident management	‘Possible Actions’ lists Stafford, Newcastle and Stoke (all in the West Midlands) as places to avoid with diversionary routes during incident management. The list should include: <i>“Warrington”</i>	Warrington, although on the edge of the route in question, suffers from congestion when the M6 has reduced flows in North Cheshire, the main alternative route passing through the town centre.

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Reference I – Improve Drainage	‘Possible Actions’ re. run-off should be: <i>“Detailed outfall and run-off studies to be carried out in relation to existing hard surfaces and proposed additional hard surfaces and environmentally-friendly mitigation measures to be agreed”</i>	Need for environmental consequences of run-offs to be better understood and for them to be dealt with in a much more comprehensive and sensitive manner. This must include proposal under ‘Possible Actions’ in ‘Reference C – Improve Safety’ to <i>“widen hard shoulders”</i>
Reference J – Strategic Routing	‘Possible Actions’ in relation to signage must include a caveat that landscape impacts and the issue of ‘clutter’ will be taken into account	In recent years very large gantry signs have been erected and often not in the most sensitive places in terms of landscape impacts. There is also an increasing plethora of all types of signs.
Reference K – Inappropriate access points to motorway	‘Locations’ needs to include ‘ <i>service stations</i> ’ if there is a general problem of this type or to specify particular ones if that is more apposite	Is there a problem with inappropriate access at service stations? If there is, it needs to be addressed.
Reference L - Severance	‘Possible Actions’ should include: <i>“work with local authorities to re-instate damaged footpaths and bridges and with the police to prevent further damage”</i> .	There appears to be no action to rectify or reduce the incidence of this in the future.
<p><b>General Comment:</b></p> <p>The emphasis of the strategy is on managing the effects of congestion rather than attempting to manage the need to travel and therefore reducing congestion. Initiatives such as encouraging freight transfer to alternative modes, better freight logistics and improving commuter public transport links would alleviate congestion and negate many unsustainable “quick fixes”.</p> <p>Footnote: CPRE stands for The Campaign to Protect Rural England, not the Campaign for the Protection of Rural England. Please make appropriate correction in list of stakeholder seminar attendees in Appendix C (page 57).</p>		