



Cheshire East Council
Strategic Highways and Transportation
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26th February 2014

Dear Sirs,

Cheshire East Borough Council – Consultation on options for a Congleton Link Road

This is the response from the Congleton Sustainability Group to the consultation on options for the Congleton Link Road. We thank you for the email response dated 13th February 2014 from Jacobs to the various questions we raised following the exhibition, which we refer to as appropriate throughout our response.

As a group we are agreed that some form of Link Road is needed for the following reasons:

- the potential high level of trip generation from the high level of growth planned for Congleton under the CEBC Local Plan (3,500 dwellings plus expansion of employment sites to the north and west of the town);
- the current congestion on the existing road network on the west side of the town, which has resulted in AQMA's at the Rood Hill/Clayton Bypass junction and on West Road; and
- A Link Road would significantly improve access to all business and industrial parks to the north and west of Congleton and would remove HGVs accessing these sites from the local road network. This would encourage these employment sites to expand for both existing and incoming businesses, thus improving employment prospects and the economy of the town.

However, the Link Road needs to be just one element of an overall package of transport measures, the principle elements of which, in line with government policy to reduce transport related carbon emissions and congestion, (particularly as set out at Section 4 of the National Planning Policy Framework (NPPF)), should be based on targeted, deliverable and workable sustainable travel measures. It has to be recognised that new infrastructure has often been shown to encourage new trips, particularly car based, as a consequence new infrastructure, like the Congleton Link Road, must be considered as the last resort to address any residual

congestion that has not been mitigated through sustainable travel measures. Having said this we believe that the level of trip generation from the proposed development even when mitigated by the provision of sustainable travel will still be sufficiently high to justify some form of Link Road.

Having considered the options put forward for consultation we do not think any one option is currently right, but that two of the options could be improved by the incorporation of amendments. However, before we comment in detail on the various options, we wish to set out what we consider are the basic requirements any Link Road must meet:

- It is essential no community severance results from the Link Road. To achieve this all development identified in the CEBC Local Plan for the north and west of Congleton should be on the town side of the Link Road, i.e. no development outside the Link Road. We are very disappointed that none of the options shown at the exhibition met this basic criterion.
- The response we received from Jacobs indicates that development traffic will be split between the Link Road and the existing road network. We wish to see a more radical scheme whereby all trips from the new development by non-sustainable modes can only access the Link Road, with all links to the existing road network from the development being assigned solely for sustainable travel modes.
- Although it is stated in several places that traffic in the town centre will be reduced, this is clearly not the case as, for example, traffic on Mountbatten Way is not reduced by any of the options, indeed your assessment work shows that traffic increases on this road with every option. We accept and welcome the reduction in traffic on the roads the Link Road bypasses, but at best these can only be described as edge of centre routes. As a result we would want any Link Road to be able to be extended to the A54 Buxton Road (either now or in the future) so as to remove traffic from the town centre roads and thereby remove the blight on the economy of the town centre caused by its bisection by Mountbatten Way.
- While accepting your traffic modelling has shown only about 35-40% of traffic on the A34 south of Congleton could use a Link Road if it is extended south (your supplementary report Traffic Flow Information to the South of Congleton) we believe that there is merit in extending the Link Road to the A34 south of Congleton either now or in the future.

Comments on Options

Based on the principles set out above the following are our views on the various options.

Purple Option

Advantages:

Second most cheap option;

Only a small part of the Back Lane and Radnor Park development site is outside this option.

Disadvantages

Bisects the Giantswood Lane to Manchester Road development site resulting in community severance;

A possible future extension to A54 Buxton Road would be more difficult and expensive as it would need to cross both the River Dane and the Macclesfield Canal.

Conclusion

We believe that it might be possible to amend this option to increase the area of development on the town side of the Link Road so we are generally supportive of this option.

Red Option

Advantages

The cheapest option therefore it possibly has the best economics (BCR)

Disadvantages

A very significant part of every development site is bisected by this option leading to significant levels of community severance;

A possible future extension to A54 Buxton Road would be more difficult and expensive as it would need to cross both the River Dane and the Macclesfield Canal.

Conclusion

The disadvantages noted above are so great that we cannot support this option.

Blue Option

Advantages

All but a small part of the Back Lane and Radnor Park development is on the town side of the Link Road, so has least community severance of any option;

Could remove some through traffic from Eaton;

An extension to the A54 Buxton Road would be easier and cheaper than the Purple and Red options as it would not have to cross either the River Dane or the Macclesfield Canal.

Disadvantages

The most expensive option and hence possibly least economic return (BCR);

By passing to the north of Eaton it could encourage future development between Congleton and Eaton thus closing the current strategic gap, which we believe is important to keep.

Conclusion

With the least community severance of any option and a possible easy link to the A54 Buxton Road we are generally supportive of this option.

Green Option

Advantages

It does not bisect the Giantswood Lane to Manchester Road development site

Could remove some through traffic from Eaton

An extension to the A54 Buxton Road would be easier and cheaper than the Purple and Red options as it would not have to cross either the River Dane or the Macclesfield Canal.

Disadvantages

Second most expensive option with possibly a commensurate lower than optimal BCR; Bisects the Back Lane & Radnor Park and Congleton Business Park development sites resulting in community severance;

By passing to the north of Eaton it could encourage future development between Congleton and Eaton thus closing the current strategic gap.

Conclusion

The disadvantages outweigh the advantages so we cannot support this option.

Conclusions

Overall we consider that the Purple and Blue Options have the potential to meet the needs of a Congleton Link Road; the disadvantages of the other two options outweigh their advantages and we cannot support either of these.

We are aware that being the most expensive, the Blue Option is also likely to have the lowest economic return (BCR). While in your email response to our questions you state that the BCRs of all options are within 0.5 of each other we are concerned (based on my experience) that the Department of Transport (DfT) will not fund the option with the lowest BCR and highest cost unless there are overwhelming reasons to do so and we consider that these do not exist in this case. My experience is that DfT will want to fund the cheapest and/or highest BCR option, which is the Red Option. However, for the reasons set out above we consider this option to be unacceptable. The other option we favour is the Purple Option which is second cheapest and hopefully has the second best BCR. If the Blue Option is ruled out on cost and/or economic grounds we would support the Purple Option.

We are very disappointed by the lack of co-operation between the Planning and Highways departments of CEBC which has resulted in community severance with all options presented for consultation, with the Red and Green Options being particularly severe. A key requirement of Spatial Planning, which has been a requirement since the 2004 Planning Act, is that the infrastructure needed to deliver development must be identified and planned as an integral part of the Local Plan. To propose options for a Link Road with no apparent regard for the development proposals or conversely to propose development sites without full and proper consideration of the infrastructure needed to deliver them, including how and where the infrastructure will fit in with the development is wholly unacceptable.

To address issues of community severance, as we state above, we believe the alignment of both the Blue and Purple Options can be improved. At the Back Lane and Radnor Park development site we believe the alignment of both Options could be amended between junctions C and D1 (reference Board 6) to enclose a greater area of the development site, but then, to ensure there is no community severance, any of the development site that remains outside the Link Road must be deleted from the Local Plan.

Similarly, at the Giantswood Lane to Manchester Road development site the alignment of the Purple Option needs to be amended between junctions E1 and F2 to enclose a greater area of the development site and again, to ensure there is no community severance, any of the development site that remains outside the Link Road must be deleted from the Local Plan.

Other Considerations

Sustainable Travel

While we welcome the potential for complementary measures such as improved facilities for pedestrians and cycling as stated on Board 9 we would want this to be a firm commitment with workable deliverable measures identified to significantly improve opportunities for all sustainable travel modes including public transport across Congleton. As such (as stated above), the Link Road must form part of a wider transport strategy for Congleton with the whole transport package delivered in a co-ordinated manner with the delivery of development. To this end we want CEBC to produce a single transport strategy for the whole of Congleton to include a Link Road, which is linked and co-ordinated with the delivery of development but which also addresses the following issues:

- To encourage sustainable travel, as far as is practical, we want all trips from the new development to the north and west of Congleton by non-sustainable travel modes to only access the Link Road, with all links to the existing road network from the development being assigned solely for sustainable travel modes;
- We believe that adopting the above will further reduce the traffic on the principal local roads from the figures displayed on Board 9 which will enable more of the existing road space to be re-allocated to all forms of sustainable travel;
- We note that the cross-section only shows a footway on one side of the new road. This is wholly unacceptable; the recently opened Alderley Edge Bypass has a combined footway and cycleway on both sides with segregated access points; from our observations these are well used. The Congleton Link Road must have similar provision.
- Public transport (PT) is particularly weak for a town which is the third largest in the Borough; currently none of the business or industrial parks are served by PT, there is poor co-ordination between buses and trains at the station and all local bus services, i.e. not between adjacent towns, only start after the morning peak. The result of this is a poor take-up of buses and a high reliance on car-based trips. The transport strategy must significantly improve the bus services; and finally,
- As far as we are aware there are no businesses in Congleton that currently have an active Travel Plan. The strategy must require businesses to have a Travel Plan and for the plan to be implemented. It has to be recognised that businesses cannot always develop travel plans in isolation and it is imperative that CEBC work collaboratively with businesses (or groups of businesses at the same location, particularly to assist small

businesses) over delivering sustainable travel measures including public transport, new and improved walking and cycling routes etc. If deemed appropriate, CEBC should set up a car sharing web site. If it would assist, we are able to provide practical assistance in developing and implementing business travel plans.

Extension south to A34 Newcastle Road

It is not clear that the traffic flows on the A34 through the south of the town reported in your supplementary report Traffic Flow Information to the South of Congleton are for the Link Road (Purple Option) as shown at the exhibition (i.e. without an extension southwards) or if the flows are for a Link Road extended to the A34. The fact that no southerly extension of the Link Road is shown on the plan in the report (B1832001/SK/35) suggests that it is the former.

Without this southerly extension all traffic to and from the A34 south of Congleton will continue to use the existing road network and the traffic figures provided on the plan in your supplementary report suggests that traffic on this section of the A34 will increase as a result of the provision of the Link Road, which is an unacceptable consequence.

Consequently, we are of the opinion that there needs to be a southerly extension to the A34 either as part of the current scheme (preferable) or provided later. Speaking to one of your officers at the exhibition, we understand that an additional link to the A34 could have a low economic return (BCR). We can appreciate this, as the shortest route from the A34 south of the town to A34 north is by staying on the existing road. However, we believe that traffic can be encouraged to use this additional link, particularly if the existing road is traffic calmed by the re-allocation of road space for sustainable travel as identified above. This could increase the BCR to an acceptable level.

Extension to the A54 Buxton Road

We are very concerned that traffic on Mountbatten Way, which bisects the town centre, increases as a result of the Link Road. Again this is wholly unacceptable as this will be a disincentive to the economic growth and wellbeing of the town centre and frustrate the delivery of the Public Realm Strategy which amongst other things, aims to reconnect the two halves of the town centre.

We are also concerned that your assessment shows that traffic on the A54 on Moor Street/Willow Street/Brook Street will also increase between opening year and design year and the Link Road (whichever option) has minimal effect on this. This section of the A54 is of a very poor standard and an increase in traffic of the magnitude predicted in your assessment work will simply significantly increase congestion.

For these reasons we are of the opinion that the Link Road needs to extend to the A54 Buxton Road north of Congleton either as part of the current scheme (preferable) or provided later. We believe that such an extension would be more readily achievable from the point where the Blue and Green Options meet the A536 Macclesfield Road as the extension would not have to cross either the River Dane or the Macclesfield Canal.

We trust the above is helpful and we would be happy to meet with you to discuss any of the issues we have raised.

Yours faithfully

Peter Minshull
Congleton Sustainability Group