

Mr S Berry
Roads Policy Division
Department for Transport, Zone 3/01
Great Minster House
76 Marsham Street
London
SW1P 4DR

21 October 2004

Dear Mr Berry

M6 EXPRESSWAY CONSULTATION: RESPONSE FROM ENGLISH HERITAGE

English Heritage is the Government's statutory advisor on all aspects of the historic environment, including historic buildings and areas, archaeology, and the historic landscape. We welcome the opportunity to comment on the broad concept of the M6 Expressway, which we consider raises two key issues – the potential impacts of constructing a major new route and the principle of introducing road charging. Our response addresses these issues by first providing some general context on transport and historic environment, our views on road pricing, and then going on to outline our specific concerns with regard to an M6 Expressway.

Transport and the Historic Environment

The enclosed policy statement, *Transport and the historic environment* sets out English Heritage's position on long-term national transport policy. This outlines the direct and indirect effects transport decisions can have on the historic environment. It recognises that new infrastructure can have an irreversible impact on the historic environment, as for example where a route passes through areas rich in archaeology, or near to historic settlements or listed buildings, as well as harming the overall character of the wider historic landscape or townscape. To ensure that change is managed in a way so that it enhances rather than damages the historic environment, we urge that transport policy at a national, regional and local level:

- encourages walking, cycling and use of public transport and promotes planning policies that help to reduce the need to travel;
- seeks imaginative solutions to transport problems which do not rely upon road based outcomes;
- encourages smallscale, innovative transport management measures; and
- requires a comprehensive and holistic assessment of potential impacts on the historic environment at the earliest possible stage.

English Heritage Position on Road Pricing

English Heritage believes a primary objective of any road charging scheme should be to manage demand for road travel and therefore reduce future need for further road capacity. We support the Government's suggestion in the Transport White Paper (*The Future of Transport: A network for 2030*) that road pricing may help to reduce congestion. As well as having economic benefits, reducing congestion in historic areas including towns, cities and rural areas can help to reduce the blight caused by the noise, pollution and visual intrusion in such areas. A copy of English Heritage's position on road pricing is enclosed.

While English Heritage supports road pricing in principle, the model established by the existing M6 Toll road meets few of our objectives for road pricing. We have similar concerns with respect to the M6 Expressway, particularly its selective approach to road pricing for new roads and the absence of a package of wider measures to manage demand for road travel.

The consultation document uses the M6 Toll to provide some context to the application of tolling. It also highlights a number of the findings from the Highways Agency's report dealing with the first 3 months of its operation. English Heritage considers that it is far too early to determine the full and long-term impact of the M6 Toll. A much longer monitoring period should be used to inform any decision on the need for, and the potential effects of an M6 Expressway in reducing traffic congestion and improving traffic flows across the broad area of the route corridor.

Potential Impacts of the Proposed M6 Expressway

The consultation paper gives very little detail about a possible M6 Expressway, particularly in relation to the route, and associated infrastructure such as new interchanges and feed roads. From the minimal information available, English Heritage has a number of initial concerns regarding the potential impacts of a parallel expressway.

From a national perspective, the concept of the M6 Expressway would appear not to accord with some of the headline messages set out in the recent White Paper, *The Future of Transport: A Network for 2030*. English Heritage welcomes the recognition in the White Paper that '*simply providing ever more capacity... is not the answer in the long run*', also that '*there will continue to be a strong presumption against schemes that would significantly affect environmentally sensitive sites or landscapes*'. It is suggested that the construction of the M6 Expressway would potentially conflict with both these policy statements as well as wider aspirations for sustainable development.

Recent Government announcements and guidance has underlined the mounting urgency of tackling climate change and reducing the emission of greenhouse gases. Given that the M6 Expressway would involve a major new infrastructure development, it is pertinent to note that under the MidMans Multi Modal Study (MMS) (paragraph 6.3.5), only the scenario based on the enhancement of public transport '*was compatible with the Government's target for reducing greenhouse gas emissions*'. The two scenarios involving the widening the M6 '*resulted in an increase in emissions*'.

In view of these potential conflicts, and the overall recommendations from the final MidMans MMS, English Heritage considers that efforts should first be directed to making best use of the existing network. This should include the non-road based measures recommended by the Midmans MMS that seek to maximise public transport usage and encourage modal transfer. In addition sufficient time should be allowed to appraise the effectiveness of measures stemming from the on-going Route Management Strategy for the M6, which English Heritage was consulted on earlier in the summer.

As set out in our national policy statement new infrastructure can have an irreversible impact on the historic environment – this encompassing the wider historic landscape and townscape as well as individual sites and areas, whether designated or not. At this stage, given the broad-brush nature of the consultation, we have not undertaken a detailed review of available baseline data. A preliminary analysis of the land up to 5km either side of the existing M6 between junctions 11 and 19 shows that there are 66 scheduled monuments, 11 registered parks and gardens, 1 battlefield and 1,603 listed buildings. These figures on designated aspects only provide an initial indication of the extent of sensitive sites in the area. A full understanding of the historic resource would need to take into account local features of interest as well as the potential for as yet unrecorded archaeological remains.

Although in the design and construction of a road scheme there is the potential to avoid any sites of special interest, in practice it is likely that the engineering limitations would make it impossible to avoid all sensitive sites. Additionally, although an individual site may not be directly affected the setting of many could be affected visually or through noise intrusion. Consideration would also need to be given to the potential cumulative impacts of traffic diversion and increased traffic levels on smaller roads within the wider route corridor.

Notwithstanding any direct or indirect impact on designated sites, the introduction of a major new dual carriageway road, with associated landscaping, link roads and services, would be likely to have a large detrimental impact on the historic landscape. English Heritage is currently rolling out characterisation studies which provide an in depth view of the historic environment dimension of landscape character. Several are already underway along the M6 corridor: the Cheshire study is due to be completed by the end of 2004 and characterisation of Staffordshire by end of 2005. The outputs of both studies will provide a complementary tool to other county-wide landscape character assessments in helping to inform planning and land management decision-making.

Conclusions

- English Heritage supports road pricing in principle and believes it has the potential to enhance the historic environment and reduce the negative impacts of traffic and transport infrastructure on the historic environment. However, the potential benefits of road pricing depend closely on the way that it is implemented, and the objectives of any scheme. English Heritage believes that a primary objective of any form of road user charging should be to reduce the need for further road building. In contrast, this proposal would appear to use road pricing as a justification for extensive road building, and consequently we would have

serious concerns about the development of an M6 expressway as outlined in this consultation.

- We support the Government's message in the Transport White Paper that it is not possible to build our way out of congestion. We believe that the proposals in this consultation are against the grain of the conclusions and messages in the Transport White Paper, as well as wider sustainability priorities such as climate change, and if implemented would set a damaging precedent.
- Before any further consideration is given to development of the concept, we would wish to see an extensive analysis of alternative measures to reduce congestion on the existing M6 as explored in the MidMans MMS and the on-going Route Management Strategy. The effects of the M6 Toll should also be subject to further evaluation.
- Any further developments should be subject to thorough appraisal of the local and wider environmental and social impacts. This should incorporate a comprehensive assessment of the direct, indirect and cumulative effects on the historic environment, which should be defined in its broadest sense.

Yours sincerely

Duncan McCallum
Head of Planning and Urban Regeneration
English Heritage

Road pricing – English Heritage’s main messages, October 2004

1. English Heritage believes a primary objective of any road charging scheme should be to manage demand for road travel and therefore reduce future need for further road capacity. We also support the Government’s suggestion that road pricing may help to reduce congestion. As well as having economic benefits, reducing congestion in historic areas including towns, cities and rural areas can help to reduce the blight caused by the noise, pollution and visual intrusion in such areas.
2. Any form of road pricing, whether locally or nationally implemented, would need to take into account the risk of diverting traffic onto unsuitable roads. As well as adding to the noise and visual intrusion in these areas, such diversion could increase the urbanisation of such roads, and add to pressure for new or upgraded roads.
3. The public debate led by the Government should include information about the potential environmental benefits of road pricing. It should recognise the environmental impacts of unrestricted growth in road traffic, including increasing levels of congestion, and/or further road building and widening schemes. The debate should emphasise the potential impact of this on the historic environment and hence on the quality of life
4. Both national and local road pricing need to be part of a package of wider measures to manage demand for road travel, including better land use planning, better public transport and the use of soft measures as identified in *Smart Choices – changing the way we travel*.

Main areas for further research and modelling

- We would like the pilots and preliminary research to investigate the risk of diverting traffic onto unsuitable roads, such as rural roads and roads through historic areas including towns and cities.
- Pilots should consider the visual impact on the historic environment of different kinds of charging infrastructure.
- Research is needed to identify whether the existing transport appraisal system based on NATA/GOMMMS is appropriate and adequate for considering the complex range of impacts of road pricing
- Research should include the risk that charging schemes will increase the pressure for out of town developments, which may be greater if a significant number of small-scale schemes are introduced in advance of a national system.

English Heritage
October 2004