


CONSULTATION RESPONSE FORM

M1 J28 to J35a maximum mandatory 60mph speed limit

Please complete this pro-forma and send to the address below:-


 Senior Project Manager
 Highways Agency
 The Cube
 199 Wharfside Street
 Birmingham
 B1 1RN

Or alternatively you can respond to the consultation by email:

M1J28-35aconsultation@highways.gsi.gov.uk

PART 1 - Information about you

Completion of this section is optional but helps with our analysis of results. A note at the end of this form explains that we may be obliged to release this information if asked to do so.

Name	
Address	Transport, Traffic and Parking Services Town Hall Sheffield
Postcode	S1 2HH
Email	
Company Name or Organisation (if applicable)	Sheffield City Council
Please tick one box from the list below that best describes you/ your company or organisation.	
<input type="checkbox"/>	Small to Medium Enterprise (up to 50 employees)
<input type="checkbox"/>	Large Company
<input type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input type="checkbox"/>	Interest Group

<input checked="" type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Police
<input type="checkbox"/>	Member of the public
<input type="checkbox"/>	Other (please describe):
<p>If you are responding on behalf of an organisation or interest group, how many members do you have and how did you obtain the views of your members:</p> <p>N / A</p>	
<p>If you would like your response or personal details to be treated confidentially please explain why: N / A</p>	

PART 2 - Your comments

1) Do you consider that the proposal to introduce maximum mandatory 60mph speed limit is an acceptable measure to mitigate any adverse impacts that these schemes could have on local air quality?	Yes	NO X
<p><i>Please add any comments:</i></p> <p>Sheffield City Council have already provisionally responded to the Highways Agency on this issue (31 January 2014) with reference to the Consultation on the Environmental Assessment Report).</p> <p>We note that the Highways Agency is beginning to take air quality and the impact of the Motorway seriously.</p> <p>However, a key issue which remains unresolved is that of the urgent need to comply with health based EU Limit Values for NO2 by 2015, which would not be achieved either with or without the Smart Motorways proposal (as in both cases air quality in our designated Air Quality Management Area would continue to breach acceptable levels) in the short to medium term.</p> <p>The City Council is concerned about the economic impact on the Sheffield City Region of the reduced speed limit on the 32 mile stretch of the M1 for an indeterminable time period. The Highways Agency has not modelled or made clear what the full impact of the proposed speed limit on the will have on the surrounding road network, the local economy and the development aspirations of South Yorkshire and the Sheffield City Region.</p> <p>Sheffield City Council, along with the South Yorkshire Integrated Transport Authority (who have responded separately to this Consultation) would therefore, like the Highways Agency to further clarify and provide appropriate evidence on the potential economic impact of the Smart Motorway proposal operating at a maximum 60 mph speed limit.</p> <p>It is also unclear how the speed limit will be enforced (and how the public will react) to ensure the claimed effect of mitigating the impact, particularly on air quality.</p> <p>If the Department for Transport/Highways Agency approve the Smart Motorway proposal and the 60 mph maximum speed limit, then the City Council want the Highways Agency to:</p>		

- # confirm their commitment to fund enforcement of the reduced speed limit;

- # implement and fund a robust monitoring regime in association with Sheffield City Council and Rotherham Metropolitan Borough Council, in order to accurately assess air quality and noise impacts of the M1;

- # provide Sheffield City Council with full access to model outputs in relation to traffic and air quality;

- # confirm their commitment to funding infrastructure improvements to improve air quality and noise on the J34S South-Bound Slip Road;

- # confirm their intention to progress investigations into ‘encouraging’ through traffic to re-assign to other strategic links such as the A1 / M18 (by improving such links);

- # continue to lobby Ministers and relevant Government Departments (DfT / DEFRA / OLEV) regarding the need to invest in low emission vehicles and associated infrastructure in order to improve air quality and reduce greenhouse gases;

- # continue to work closely in partnership with Sheffield City Council and local communities with a view to further mitigating the impacts of the M1 in Sheffield on neighbouring residential areas, namely Tinsley;

- # consider how the Agency and the DfT can financially support local interventions (as identified in the Sheffield Low Emission Zone Study) such that the air quality impacts of the M1 can be “off-set” in the short to medium term by reductions across the wider Sheffield district. This would also permit an earlier reinstatement of the 70 mph speed limit.

2) Which of the following times of operation do you consider most acceptable?

7 days a week 24 hours per day (all day, every day)	7 days a week Daytime only (e.g. 07:00-19:00)	7 days a week Night time only (e.g. 19:00-07:00)	Other days or hours of operation (Please specify)
Monday to Friday	Monday to Friday	Monday to Friday	Monday to Friday

24 hours per day (all day Mon-Fri)	Daytime only (e.g. 07:00-19:00)	Night time only (e.g. 19:00-07:00)	Peak hours only (a.m. and p.m.)
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Sheffield City Council, along with the South Yorkshire Integrated Transport Authority (who have responded separately to this Consultation) would like to better understand what alternative time periods have been considered / modelled and why they were discounted.

Furthermore, Sheffield City Council would like to know how the Highways Agency intend to robustly monitor the scheme and its impacts and whether the proposed operational time periods (7 days a week / 0700 – 1900) will be reviewed and possibly amended as a result.

For the purposes of this consultation, it should be assumed that the speed limit will need to be in place for several years. However, we are not able to give an indication in this document of how many years the speed limit will need to be retained. Nevertheless, it is important to stress that the proposed speed limit will be removed as soon as the background air quality improves sufficiently to enable this.

We would be interested in your views about whether having the proposed speed limit in place for different durations would have differing impacts on you or your organisation.

<p>3) Do you consider that different time durations (by way of example only, two or three years as opposed to seven or eight years) might affect you or your organisation differently?</p>	<p>Yes</p>	<p>NO X</p>
<p><i>If yes, please give your comments:</i></p> <p>Sheffield City Council would like to re-iterate the specific concerns made by the South Yorkshire Integrated Transport Authority (who have responded separately to this Consultation):</p> <ul style="list-style-type: none"> • It is appreciated that the consultation is not about the principle of MM-ALR (or SM-ALR). However, the 60mph speed limit proposal is required to mitigate the impact from SM-ALR and does not represent per se, an improvement to the current situation. • In discussions with the Highways Agency and their representatives Mouchel we have been made aware that one of the main reasons for introducing the 60mph is to provide a constraint on traffic growth (to offset the increased capacity provided by ALR). It is this mitigation that means that the traffic growth associated with the implementation of the Smart Motorway All Lane Running proposals and associated emissions is constrained so that the air quality implications are no worse than the current position. • Given the difficulties of predicting the uptake of cleaner engine technology and background air quality trends (as you acknowledge at the bottom of the previous page) it is unclear how the reintroduction of a national speed limit would be managed given the adverse air quality implications that would arise from a consequent increase in traffic. • Should the SM-ALR scheme and the 60mph speed limit be introduced and the constraining effect of the reduced speed limit not be realised, the levels of motorway traffic will lead to a worsening of the environmental conditions for communities close to the M1. It is unclear what the potential mitigation for this scenario would be. • Officers from Rotherham Metropolitan Borough Council and Sheffield City Council have requested from the Highways Agency further details of the forecast traffic growth that was used within the traffic modelling and subsequent Environmental Appraisal and we are keen to continue liaison with the HA to ensure that the proposals do not act as a constraint on the Sheffield City Region growth ambitions in as safe a way as possible. 		

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Consultation Document



4) Are there any aspects of the proposal to introduce a maximum mandatory 60mph speed limit on the M1 between junctions 28 and 35a which give you concerns?	YES X	No
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If yes, please give your comments:

Please refer to the comments made in Section 1) – 3) above.

In addition, Sheffield City Council would like to re-iterate the specific concerns made by the South Yorkshire Integrated Transport Authority (who have responded separately to this Consultation):

- How is the 60mph to be enforced and how is this to be funded?
- Has allowance been made for enforcement margins (10% +2) in the modelling?
- Breakdowns / incidents will remain broadly the same and it is inevitable that without a hard shoulder there will be more and longer lane closures on this 32 mile stretch of the M1 with a greater impact on the local road network.

5) Are there any additional comments you would like to make about the proposal to introduce a maximum mandatory 60mph speed limit on the M1 between junctions 28 and 35a?	YES X	No
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If yes, please give your comments:

Sheffield City Council would like to re-iterate the specific concerns made by the South Yorkshire Integrated Transport Authority (who have responded separately to this Consultation):

- The 60mph limit is alleged to control growth on the motorway although no rationale is given. This seems to conflict with the aim of the MM-ALR to create capacity to improve traffic flow and allow for growth. It is not clear how the proposal will impact on the local economy and our development aspirations nor how long the proposal needs to be in situ.
- Because of the potential impact on their area, there is also concern that Doncaster

Metropolitan Borough Council were not directly consulted and further details are required about the suggested measures to promote the A1(M) and M18 alternative route.

- There is also an unresolved issue of 'perception' which is likely to affect the attractiveness and competitiveness of the Sheffield City Region in our desire to seek much needed inward investment. Such investment may be deterred if it is perceived that the sub-region requires such onerous measures to deal with existing or likely future problems whereas others do not (in part at least through previous investment in national infrastructure).

Note on disclosure of information

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).

If you want any information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Highways Agency.

The Highways Agency will process your personal data in accordance with the DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.