



262 Torrisholme Road  
Lancaster  
LA1 2TU

9 December 2009

Secretary of State for Transport,  
Government Office for the North East,  
Local Authority Orders Section,  
Citygate,  
Gallowgate,  
Newcastle upon Tyne NE1 4WH

Dear Sir,

### Heysham-M6 Link Road Orders and Schemes

Transport Solutions for Lancaster & Morecambe (TSLM) wishes to object to the Heysham-M6 Link Road Orders and Schemes. Its grounds for objection are issues that were not adequately considered at the Public Inquiry into the scheme held from July to August 2007.

#### **1. Alternative Options to Road Building**

A new road has always been the only option seriously considered. No non-road-building option was appraised, contrary to Government policy and guidance. In particular, LCC never did an analysis of a package to address the transport problems of the district, based on sustainable transport measures, supplemented by demand management and improvements to existing infrastructure, where appropriate (e.g. Bridge at Luneside, widening A683).

#### **2. The Faber Maunsell Transport Vision and Strategy**

Faber Maunsell recently produced a Transport Vision and Strategy for the Lancaster District. Such a report should have informed the proposer's appraisal of alternatives. If the recommendations were implemented, they would reduce congestion and free up road space, which, with modifications to existing infrastructure (e.g. Bridge at Luneside, widening A683), could provide improved access similar to the forecasts for the Link Road, at much lower expense than building a new road.

### **3. Funding of Complementary Measures**

An action plan based on the Faber Maunsell report is a condition for the scheme. The plan must include funding. Yet LCC has no budget to fund the action plan, or the Park & Ride (£3.5m), or the cost overruns which are inevitable in a road-building scheme. Without this funding in place, the scheme should not proceed.

### **4. Choice of Route**

The Western Route was rejected because of its potential impacts on European Protected Areas to which it was adjacent. However, these impacts were not assessed in detail. The correct procedure was not followed: the Habitats Directive states that an "Appropriate Assessment" must be undertaken to establish whether the integrity of the site will be affected, and this was not done for the Western Route.

### **5. Other alignments to the North**

Other routes and alignments to the North have not been assessed adequately by the County Council. Options such as

- Routing the Link Road under, rather than over, the West Coast Main Line, or
- building an at grade junction, controlled by traffic lights, at the junction of B5321 Torrisholme Road/Lancaster Road,

would reduce the adverse visual impact of the scheme, and air, noise and light pollution for nearby homes.

### **6. Carbon Emissions**

The Heysham M6 Link will produce an additional of 23,500 tonnes of carbon dioxide each year. But the government has embedded in statute a requirement to reduce CO2 emissions by 80% on a 1990 base by 2050. A project that increases CO2 emissions so dramatically over an assessment period of 60 years inevitably throws a large burden of additional CO2 cuts in other sectors of the economy, when these have not been calculated or agreed. There is no clear assessment of how this additional burden can be absorbed by other sectors, and no a clear funding strategy for how this disproportionate loading can be delivered. So the project is perverse, potentially unlawful and contrary to Parliament's intentions in passing the Climate Change Act. To go ahead with the scheme would render much more difficult Parliament's clear intention of enshrining CO2 reduction targets into statute.

## **7. Flooding**

At the Public Inquiry, LCC relied heavily on Halcrow's Flood Risk Assessment. But Halton Parish Council has since produced a report which finds that the FRA is inadequate because it ignores climate change and its effects on river flood levels. This finding is endorsed by the recent, unprecedented, high rainfall in Cumbria, leading to damage to property, destruction of bridges and loss of life. The proposed low-level Lune Bridge would lead to a significant increase of flood risk to property and residents of Halton.

## **8. Widespread Opposition**

There is widespread opposition to the scheme. Residents in the area affected have consistently opposed the scheme. The local MP is opposed to it, and has carried out surveys which show that well over 90% of her constituents oppose it. On 20 June 2007, Lancaster City Council voted to withdraw its support from the Northern Route, a position which it has not since reversed. It would be wrong to proceed with a scheme which has so little local support.

Yours faithfully

D F Gate  
TSLM, Chair