

**Response to Lancashire County Council's Written  
Representations  
re  
Application for Development Consent to complete  
the Heysham to M6 Link Road**

## **Summary**

- S1. This representation has been made jointly by CPRE and the North West Transport Activists' Roundtable. In the absence of the updated Planning Statement requested by the Examining Authority, it deals mainly with the references to planning policy context in Lancashire County Council's submission of 8<sup>th</sup> May, in particular:-
- LCC's comments on Relevant Representations: planning and policy context
  - LCC's Written Representation on Planning Policy Context
  - LCC's response to ExA's question 1.
- S2. We also make some brief comments reinforcing our established position with regard to the provision of a funded and timetabled package of specific complementary measures that should be included as Requirements in Schedule 2 of the DCO if permission is granted.
- S3. However, the scheme demonstrates severe conflicts with national, regional and local planning policy contexts, and so even if such a package were identified, there would still be a need to examine the scheme as a whole on its merits.
- S4. The scheme conflicts with almost every aspect of the policies identified as relevant by LCC in the Lancaster District Core Strategy, namely Policies SC1, SC5 and E1. A Heysham-M6 Link Road is identified in Policy E2, but permission had been granted for the 2008 scheme before the Strategy was adopted. The Strategy therefore had to make reference to it and acknowledge the planning permission that had been given. The scheme currently before the NID needs to be judged on its own merits, in its entirety.
- S5. Any support claimed for the scheme from the Core Strategy is at any rate conditional on, amongst other things, a full range of sustainable traffic initiatives being in place. This condition has not been met.
- S6. Claims of support from the Regional Strategy are shown to be misleading. Support claimed from other local strategies and programmes is also demonstrated to be in error.

- S7. The scheme is shown to be in conflict with national, regional and local planning policy with regard to climate change.
- S8. LCC's approach to the new NPPF lacks substance. We demonstrate that the scheme is not supported by the NPPF when its policies are taken together as a whole. In particular:-
- a) The presumption in favour of sustainable development does not apply to this scheme, as it does not comply with the conditions in the local plan, which in any event is out of date in relation to climate change and natural environment, for which national policy has been strengthened;
  - b) Taking the applicant's claims on their face, only one of the core planning principles can be argued to support the scheme - and that argument is open to considerable doubt - while the scheme's impacts conflict strongly with five core principles;
  - c) Specific NPPF policies indicate the scheme should be restricted, namely in relation to Green Belt and flood risk; and
  - d) The project has very serious adverse impacts in relation to six policy areas of the NPPF (sustainable transport, Green Belt, climate change, flooding, natural environment, and heritage) but no real benefits, even in relation to the one (sustainable economic growth) from which support is claimed; and in any event the applicant has failed to show that other options would not secure this objective better.
- S9. Substantial conflict is therefore demonstrated with relevant national, regional and local policy. There will always be elements of policy that support and conflict with any major proposal, but the overwhelming weight of policy is shown to be contrary to the scheme in this case. The negative impacts of the scheme, as demonstrated through evidence submitted by a range of interested parties, would clearly and demonstrably outweigh the benefits. The scheme should not be granted consent.