IPC Examination : Heysham M6 Link: Reference Number TR010008

Presented by Professor Keith Hanley: Unique ref no.XXXX and Mrs Jadwiga Hanley: Unique ref no. XXXX

(Member of the Halton Residents' Group: Unique ref no. XXXX)

This submission refers to Annex C, Examining Authority's first questions, Q5 of Questions addressed primarily to LCC, TSLM, CPRE, Transport Activists Roundtable Northwest etc.

We are writing both in our private capacities and as commissioned by the Halton Residents' Group, because our experience and opinions represent those of the whole group and our many outside sympathizers. We believe that as well as providing evidence that the necessary processes of consultation have not been properly conducted, this history is an example of the haste and lack of due attention which is mirrored in many aspects of a rushed and unevolved application to the IPC.

The Link

As part of due consultation between April 2011 and January 2012 Lancashire County Council disseminated four issues of a pamphlet entitled Heysham to M6 Link Road: The Link. These were the principal medium for broadly announcing and explaining a project which was still in the pre-application phase when the series began, but the impression immediately created, and we believe intended to be created, was of a fait accompli. Both the pamphlets and subsequent exhibitions and popularising events misleadingly closed down the range of concerns which were still open to legitimate discussion and objection, and a course of information management and baseless references was set in train.

Issue 1 established the attempt to restrict and minimise the scope of consultation for what was a new application: 'Changes to the approved scheme . . . mean we must make a revised planning application', and the timeline is represented as what is going ahead without any acknowledgement of the contingency of the whole process. Readers are invited to ‘become involved in shaping the proposals’, never to entertain the possibility of opposing them.

Issue 2 supports the same impression that it is all a certainty: ‘It is likely that the Heysham to M6 Link will be the first road scheme progressed through this new [IPC] process.’ Again, the rhetoric of 'Have your say!' is confined to 'help shape the final application', with those attending the 'consultation events' encouraged only to supply 'changes to the scheme' and not 'of' significant aspects. The application is once more treated as a minor distraction: 'The latest step follows the government’s “green light” on changes to the Heysham to M6 Link'. The truth is that this stage was amber.

Issue 3, headed ‘Overwhelming majority understand the link road proposal’, referring to returns made by 33% of those attending the exhibitions, of which percentage a further 28%
had claimed either not to understand or have a limited understanding of the proposals! The results presented in this way were based on only one of 7 questions in the questionnaire referred to: ‘Having considered the information that was available to you, would you say you have a good understanding of our proposals?’ The returns for the remaining pertinent questions have never been published or indicated in any way, such as 4: ‘Has the information provided at the exhibitions been helpful?’ With the follow-up boxes: ‘What we propose to construct; How construction will affect your community; How we will affect the environment; What your community will look like when the scheme is completed.’ Following complaints, and once the application had gone in, Issue 4 became noticeably more circumspect. But the damage was done long before.

Overall, The Link might be clever PR but it is certainly seriously flawed consultation.

The Halton Consultation Event, 14 June 2011

Given the confusions arising from The Link and serious misgivings related to the Halton slip road, a number of Halton residents were concerned to raise the issues of its necessity and design. When we asked the consultants in attendance whether or not major aspects of the scheme, not simply details for improvement, were part of the consultation process they confirmed that they were. Mr John Williams, who was one of the officials, told us the same, yet by the time that we were able to speak with Mr Steve McCreesh, the Project Director, he flatly contradicted that advice, and said that they were only concerned with matters of mitigation.

I attach my correspondence with Mr McCreesh which began with my written complaint about the discrepant information made in response to an invitation from LCC, 31 May 2011 (1). In his reply, which I attach (2), Mr McCreesh stated, for the first time and contrary to the occasion described above, that ‘this consultation sought feedback on the whole scheme . . .’, and now outlined at length the advice he should have given at the Halton event, but did not, according to the Planning Act 2008: Guidance on pre-application consultation, where the first of five clauses states: ‘to allow members of the public to influence the way projects are developed by providing feedback on potential options . . .’, and where only one clause relates to the matter of ‘[enabling] potential mitigating measures to be considered’. He now claimed that the LCC had indeed been ‘seeking feedback on all aspects of the proposals’. The effect of his former misleading attitude was to persuade enquirers that the slip road was beyond discussion. The advisor had not, in fact, ‘corrected’ his previous information before I invited Mr McCreesh to discuss the situation with him, but Mr McCreesh’s reply is beside the point: it was Mr McCreesh, not the advisor who was misleading members of the public. Not only during that particular event had many left with the wrong impression about the limitations of the exercise, but presumably many who attended the other related events along the route.

This was in direct contravention of the Planning Act guidance that: ‘Above all, it must be clear what is being consulted on. Promoters must be careful to make clear what is settled and why, and what remains to be decided, so that the expectations of consultees are properly managed.’
(I attach a letter to the *Lancaster Guardian* from John Leach, 23 June 2011 (3), and a letter of confirmation from Mr and Mrs Pilkington (4) which explains the same situation from the experience of others).

**The Halton Slip Road**

The crucial issue is whether or not the Halton slip road was still a matter for consultation prior to the application to IPC. In every exchange with LCC an attempt has been made to distract enquirers from having that question addressed in two ways. First, representatives of LCC have insisted on treating it as a request to reconsider the alternative routes which have been historically set aside, and have repeatedly sought to by-pass the real and specific query regarding the slip road. The tactic was introduced by Mr McCreech in the letter to me (8 August 2011) referred to above which answers at length why alternative routes were not consulted on, without mentioning my specific concern regarding the slip road.

The distinction was glozed over again by County Councillor Tim Ashton in his reply of 22 December 2011 (attatched, 5) to the Halton Residents’ Group’s letter of complaint of 26 September 2011 (which that group have sent on to you). There, under ‘Consultation’, he equates the matter of ‘alternative modes and routes’, which he acknowledges were not attended to, entirely with the overall optional routes which had not been recommended by previous reports in 2007 and 2008, making renewed discussion unnecessary. But that, of course, was not the matter of concern.

It is important to separate out two different lines of argument which LCC have repeatedly confused in order to see off the slip road objection. They are clearly represented in Link 4 (January 2012), where it is claimed three main questions are answered. For the first question, ‘Why is the Halton Link included?’ it is stated that it ‘was added to the scheme following a request by many village residents at the August 2001 public consultation’ (see below). The second question as to why alternative routes were not consulted on is answered by raising the history of proposals which had led to the present route which came to a head in the Planning Inquiry’s Inspector’s report of 2007.

In this way, all alternative considerations to the scheme are generalized as demands to re-open the choice of route, while the legitimate question of the slip road, which was not covered in the 2007 recommendation (nor the Faber Maunsell Report of 2008), is side-lined as the fulfilment of an alleged local request.

**2001**

Councilor Ashton also stated that the Halton slip road ‘was included at the request of the Halton residents at our public consultation in 2001. This was exhibited at our 2005 consultation events and again included on our plans and leaflets during this latest consultation’. The last point is disingenuous, as though obviously shown on the maps at the exhibitions it has never been consulted about, and it is precisely not being permitted to address it in the most recent events that we are all complaining about.
The fig leaf of the 2001 ‘request’ is in truth a complete myth which has gained authority by repetition. We were present along with many neighbours at the said meeting, when several contradictory suggestions arose. Though some residents may well have brought it up, many present were opposed to the whole scheme, and it was by no means an upshot of the meeting. No vote or show of hands was called on a matter which was not prominent in the overall discussions. To represent (on what authority?) what was spoken about as a ‘request of the Halton residents’ is a *post factum* travesty to cover the total lack of consultation about a proposal which even those who might have advocated it over ten years ago had little or no idea about what it would entail.

This is a very serious distortion, and the more so because it is the only grounds given at any stage for the slip road, and it is simply untrue.

**Consultation and Halton PC**

Over the intervening time, the only serious canvassing of local views was for the exercise reported in the Consultation Report for the Development Management Policies and Land Allocations Combined Scoping Document, October 2010, which explicitly ruled out discussion of the M6 Link on the grounds that it was then ‘under consideration’. What was manifest, however, from the response of the village community was that it wished to remain separated from the town with its protected green belt (information supplied to you by the Halton Residents’ Group). No party to the discussions about the slip road has ever denied that the upshot of the proposed slip road would seriously undermine that desire.

What has appeared to fill the gap, however, are the unfortunate actions and inaction of the civil Parish Council which have been central to the chain of misinformation. This unelected body is listed as third of the LCC’s chief consultees in Link 3. (The village’s only elected representative, Councillor Paul Woodruff, the current mayor, has clearly and consistently voiced his opposition to the slip road). In summer 2009, Mr Brian Jefferson, the chair, wrote to the *Lancaster Guardian*, as *chair of the PC*, expressing his view that the road should be built and built quickly. This gave the semblance that his personal views were those of the PC. Though he has since apologized for this ill‐considered act, it was damagingly assumed by readers that his own views were those he had presumably established as the PC’s.

Indeed, Mr Jefferson’s own views and his private discussions have played a misleading role in consultations with LCC which were not made public. He has had several meetings with Mr McCreesh which were never publicly reported or referred to in PC minutes. When I phoned various officers at LCC following the invitation of 31 May 2011, including Mr Nigel Cleave and Mr Stephen Molyneux, I was informed that a file with them stated that the Halton PC had confirmed that they had a resolution that a slip road was requested by Halton. I believe this to be the origin of the myth described above. Certainly there are no PC minutes from that time to that effect. On 8 August 2009, Margaret Mason, Clerk to the PC, confirmed in writing that the only minuted view was one recorded in 2007, when ‘a narrow majority decision with the Council confirms that Halton with [Aughton] Parish Council does not support the current M6 link Road Proposal’. Obviously, officers have changed many times since 2001, and are changing
all the time, but there is absolutely no historical evidence for the PC having approved the whole scheme or the slip road, let alone requested one.

Transparency has been badly lacking. We are left with speculations. As chair of the local Conservative Association, Mr Jefferson has running dealings with involved persons, including the current local MP. We are not suggesting anything conspiratorial, but it is easy to imagine how conversations and assurances with no official authority become communicated in closed discussions. What is clear is that neither Mr Jefferson nor anyone else can substantiate a spurious claim which LCC have found fit to employ in many places.

After this situation was raised in recent PC meetings, a questionnaire was distributed to some households in the village. Various claims have been made for that exercise in the local press and parish magazine, but the reasons for its lack of merit and extraordinary prejudice are clearly outlined by my letter to the Lancaster Guardian, which I attach (6). Reference to Lancaster City Council’s democratic officer would have explained to those who circulated it how and why it was so flawed, but what I wish to stress here is that distributing it in haste just before Christmas demonstrated a desperate attempt to cover the yawning gap over consultation. But the consultation, even if valid, was being made after the application had been submitted.

Much of the related documentation evidences retroactive attempts to address problems which have been urged by those residents whose objections are based on local knowledge and shared conviction but who, of course, had not been previously consulted at the right time during the process.

Link 4 belatedly acknowledges that LCC are ‘aware of the concerns of residents with respect to the impact on Church Brow’ and proposes that they will now, after the application, ‘consider extending the 20mph area within Halton’, and they will now ‘consult on any additional measures’. I leave aside the efficacy of these suggestions to point out that they represent only some of the pointed issues they have failed to consult on prior to the application being made. The PC enthusiast who devised the questionnaire referred to above writes in the Parish Prattle magazine: ‘Lancashire County Council tell us that they are willing to send in a team to look at safety aspects. This sounds like a good first step for us’. (My italics, please note the date: Feb/March 2012!)

Everyone interested knows, and will always know, that whatever problems and accidents may occur were the slip road to go forward, the people of Halton were never consulted, and their real and relevant anxieties only began to be addressed after the application was submitted.

**Summary**

1 Halton has never been truly consulted about the slip road.

2 Attempts to give a different impression are fallacious and misleading.

3 The duty to consult all interested parties fairly and openly has not been duly carried out.
29 July 2011

Comment on the consultation concerning the proposed Heysham to M6 Link

I have already contributed to a group document submitted by Mike Jacob, from Halton. I want to take this opportunity of underscoring a very serious defect in the consultation process which in itself, to my mind, has seriously undermined the whole process.

I and my wife attended the consultation and exhibition at Halton, and we were concerned to establish the remit of that exercise. Your consultants all confirmed that its scope was meant to cover the whole question of the route, its desirability and the cogency of its rationale from every viewpoint at the present time, and that it was not merely an exercise inviting comments for physical and technical modification and improvement assuming that it was to be built.

Yet when we consulted Mr Steven McCreesh, the Project Director, he completely denied that scope. At my request, we went over to the consultant who had advised us differently about exactly what LCC had been requested to address, and Mr McCreesh got him to withdraw his interpretation, insisting on the specific and narrower focus of his own. The conversation was witnessed by several of our neighbours in Halton.

In a recent telephone conversation with Mr Nigel Cleave, however, the consultants’ interpretation was confirmed: that LCC had indeed been asked to consult on all aspects of its current plan.

The confusion fundamentally disturbed many of those who attended the consultation, in Halton and elsewhere. As a consequence, legitimate questions and concerns have not been put, and related enquiries have not been pursued. Full and proper consultation has not taken place. The situation is obviously unacceptable, and is symptomatic of the haste and unreadiness with which the current process has been pushed forward.
Dear Professor Hanley

HEYSHAM TO M6 LINK CONSULTATION

Let me first apologise if you feel that you were misled or that you believe you received conflicting responses to questions raised at the exhibitions and in the subsequent telephone conversation with Nigel Cleave. I believe there may have been a misunderstanding of the information sought and answers provided.

My understanding from your letter is that you were attempting to ascertain the remit for the consultation exercise. Please be clear this consultation sought feedback on the whole scheme and the whole scheme was presented at the exhibition. We will then be submitting the whole scheme to the Infrastructure Planning Commission (IPC) for a Development Consent Order.

I believe it is the understanding and interpretation of the term 'all aspects of the current plan' which may have led to some confusion. What we have not been consulting on is the need for the scheme or alternative routes. To explain why, I must refer you to the 'Planning Act 2008: Guidance on pre-application consultation' (later referred to as CLG Guidance), a document produced by the Department for Communities and Local Government in 2009. A web address to obtain a copy of this document is included at the end of this letter or if you wish, I could send you a copy. Relevant paragraphs of this document are referred to in the remainder of this response.

Paragraph 8 provides the following guiding principle for the consultation exercise;

8. The new requirements for pre-application consultation are a vital aspect of the new regime. The early involvement of local communities, local authorities and statutory consultees at this stage can bring about significant benefits for all parties:

- to allow members of the public to influence the way projects are developed by providing feedback on potential options, providing them with an opportunity to shape the way in which the community develops
- to help local people understand better what a particular project means for them, so that concerns resulting from misunderstandings can be resolved early
• to obtain important information about the economic, social and environmental impacts of a scheme from consultees, thus help the promoters identify project options which are unsuitable and not worth developing further
• to enable potential mitigating measures to be considered and, in some cases, built into the project before an application is submitted
• it may identify ways in which the project could, without significant costs to promoters, support wider strategic or local objectives.

That is to say, we were seeking feedback on all aspects of the proposals and you are correct that these did include physical and technical modifications and improvements should it be built. The philosophy of the IPC is that the developer should allow the opportunity for local people to influence how their community could be affected should the scheme be constructed.

Paragraph 10 of the CLG Guidance states:

10. It will also benefit communities, enabling local people to become actively involved in shaping proposals which affect their local communities at an early stage, where their views can influence the final application.

As previously stated we were not consulting on alternatives to the proposed route. As I am sure you are aware, this scheme has a significant history. There have been extensive consultations in the past into the different options for the Heysham to M6 Link, carried out in 1993, 1997 and 2001. In 2004 the northern route was selected following legal advice that the routes to the south of Lancaster were “unbuildable” on environmental grounds.

A detailed Environmental Impact Assessment (EIA) was carried out to the same high level for both the Western (Green) Route and the Northern (Orange) Route over an 18 month period from late 2002 to early 2004. The EIA identified that the western route would have impacts on European Protected Areas (Morecambe Bay cSAC/SPA and Ramsar Site including Lune Estuary SSSI) and Species (bats and great crested newts).

These potential impacts would be in breach of the European Directives that have been transposed into UK law as The Conservation (Natural Habitats &c.) Regulations 1994 (refer Regulations 44, 48, 49). As such any route to the south of Lancaster and affecting these sites could not legally be constructed.

In addition, independent Inspectors had already recommended deletion of the western route from the Lancashire Structure Plan and the Lancaster Local Plan and recommended that a northern route should be pursued.

In recognition of this, and in accordance with paragraph 20 of the CLG Guidance, we could not responsibly offer alternative routes that we were aware could never be constructed.

20. Above all, it must be clear what is being consulted on. Promoters must be careful to make clear what is settled and why, and what remains to be decided, so that the expectations of consultees are properly managed.
I am sure you must agree that would be a waste of resources and would provide unnecessary confusion and antagonism if an alternative offered at the exhibitions could not be progressed.

Similarly, following extensive study during the Planning Inquiry the Report to the Secretary State for Communities and Local Government, (submitted by the Planning Inspector in January 2007) stated that, “the objectives of the Scheme cannot be met by alternative asures and that a new road is accordingly required.” [Para 8.3.26]. Therefore we did not k suggestions on alternative modes.

By said all this, whilst we have not been actively consulting on the need for the scheme, matives routes or modes, people have been writing in with comments about these sects and they will be included in the Consultation Report and reported to the IPC.

ce we have submitted our application to the IPC, they have 28 days to decide if our mission satisfies the requirements to be accepted for examination. Should the application be accepted we will be required to publicise this fact and make people aware they have 28 days to register with the IPC directly to become an interested party. By istering at this time you will be afforded the opportunity to make representations on any want matter. You will also be invited to attend the preliminary meeting where the mmission will assess the issues and decide how the application will be examined.

ollowing acceptance of the application by the IPC, the Commissioner handling the case will id “how to examine the application” [Planning Act 2008 s.87]. The Commissioner can, if deems necessary from the relevant representations made, make the mode, the route or need issues for examination.

A National Policy Statement for National Networks has yet to be published. As such, the Commissioners will examine the proposal and then forward their recommendation to the Secretary of State before any decision is made to grant or refuse Development Consent

could also add that I did not “get the consultant to withdraw his interpretation”. The ultant involved had already approached you and apologised for giving you misleading unction. This was before I was involved in any discussion with you.

ope this clarifies our scope of consultation and demonstrates that we have acted in line the published guidance and in a responsible manner. Should you have any further ries please do not hesitate to contact me, or alternatively if you prefer, please write to Jo ton, the Executive Director of the Environment Directorate, at the same address.

rs sincerely
ve McCreesh
ject Director – Heysham to M6 Link

opy of the CLG Guidance document can be obtained from the following web address:
We’re on the link road to nowhere

I attended an exhibition about the proposed link road. On the way I met extremely angry people who felt their views were not being heard or their questions answered. I observed people making points to council officials who glanced over when they were supposedly listening. This was also my experience.

Central government will contribute £111m towards the cost. Although an analysis of major road building schemes shows they overspend by an average of 50 per cent an assessment has been made of the impact of this on Lancashire’s finances. There are people who have identified that the road will bring benefits to them; however no consideration has been made to operate a toll on the road.

The government has pledged to be the greenest ever, yet this scheme will increase the carbon footprint of the area. That it will only be a small increase does not mitigate that it is in the wrong direction.

The scheme has not been designed to relieve traffic congestion in Lancaster. The difference between this and the previous proposal is the park and ride. No thought has been given to implementing this element in advance to ascertain its impact.

The impact of rising fuel prices has not been assessed in terms of future traffic volumes. There is a belief that these will be mitigated by improved fuel efficiency of motor vehicles despite the ever increasing costs of producing fuel.

In summary, it puts in jeopardy the county’s finances, it does not help with our climate change commitments, it does not recognise the increasing fuel costs and it was a solution to a problem in 1948, a radically different world from today. We should no more dream of building this road than we would of building a spur of the Lancaster Canal to Heysham and Morecambe.

John Leach
Prospect Drive
Hest Bank
We endorse the representations as presented by Mr R. Hamley.
Our own conclusions on leaving the 14 June 2011 consultation were that it was presented as a ‘done deal’ and our opinions were only sought as to the species of trees to be planted and other peripheral matters.

David and Valerie Hinkerton
Halton Residents Group
unique ecf no
Dear Sir/Madam

COMPLETION OF HEYSHAM TO M6 LINK

... Thank you for your recent letter detailing your views and comments on the proposed completion of the Heysham to M6 Link. For clarity I will address your concerns in the order raised in your letter, following a brief summary of the points made. I also attach a plan that shows the details of the Halton Link.

- While we acknowledge traffic increases on Church Brow, there is an 8% net reduction in traffic through the village. Where the traffic increases on Church Brow, we are looking at traffic calming measures to manage the increased flows.

- Our consultation was for the proposals we are seeking development consent to construct. We did not present route and mode alternatives as extensive previous studies and examinations have shown that the current route and road solution are the most appropriate to meet the scheme objectives of linking the Heysham and Morecambe peninsula with the M6.

- The contribution of £12.3 million by the County Council attracts £111 million of investment to the region from central government. This is money that would not otherwise be available to the county. The contractual arrangement with the contractor for the scheme provides an upper limit for costs that the County Council must pay; over which cost overruns are borne entirely by the contractor. This is not an open ended commitment by the council.

- The link road is forecast to provide up to 40% reduction in the traffic volumes over the two main bridges across the River Lune (the Skerton and Greyhound Bridges) and along Caton Road (the A683).

Continued...
Traffic Increase on Halton Road/Church Brow

A road link between the proposed roundabout at Shefferlands and Halton Road, called the Halton link, has been included in scheme proposals since 2001. This link was originally included at the request of Halton residents at our public consultation in 2001. This was exhibited at our 2005 consultation events and again included on our plans and leaflets during this latest consultation.

While we have received comments raising concerns about the increase in traffic this creates along Church Brow, at no time during the recent consultations, or in the past, have we been asked to remove the Halton link. For this reason our latest application for development consent, submitted to the Infrastructure Planning Commission (IPC), includes the Halton link.

While we retained this Halton link, we have noted residents' concerns and take this opportunity to clarify the traffic figures and flows through the village. While there is a forecasted increase in traffic on both Church Brow and High Road, there is a decrease on Foundry Lane (which becomes Bottomdale Road), Denny Beck Lane and Low Road. This is shown in the schematic below.

![Traffic Flow Schematic](image)

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Foundry Lane</th>
<th>High Road</th>
<th>Low Road</th>
<th>Church Brow</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do-Minimum</td>
<td>5300</td>
<td>4800</td>
<td>7700</td>
<td>4600</td>
<td>22500</td>
</tr>
<tr>
<td>Do-Something</td>
<td>2000</td>
<td>5900</td>
<td>4900</td>
<td>8000</td>
<td>20800</td>
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<tr>
<td>Difference</td>
<td>-3300</td>
<td>1000</td>
<td>-2800</td>
<td>3400</td>
<td>-1700</td>
</tr>
<tr>
<td>% Difference</td>
<td>-62%</td>
<td>20%</td>
<td>-36%</td>
<td>74%</td>
<td>-8%</td>
</tr>
</tbody>
</table>

The increases are forecast to arise mainly from traffic within the village accessing the Heysham to M6 Link Road to access the motorway, Heysham or Morecambe. The reductions in traffic result from 'rat running' traffic diverting to the new link road rather than passing through the village and using Low Road or Denny Beck Lane. The net result is an 8% reduction in traffic passing through the mini-roundabout.

While this does not resolve residents' concerns about the increase along Church Brow, the reduction in traffic through the village can only be regarded as positive. To address the Church Brow concerns, the design team will be assessing mandatory 20mph speed restrictions and other supporting traffic calming measures. Residents will be consulted on options prior to implementation.

Continued...
Consultation

The most recent consultation period for the Heysham to M6 Link took place between 1 June and 31 July 2011. At the exhibitions we displayed plans and details of the whole scheme as proposed for the completion of the Heysham to M6 Link. Our Statement of Community Consultation and Supporting Information documents both outlined that we were keen to hear your feedback on our whole proposal. Indeed, at the exhibitions we received comments on a vast range of elements of the design, concept and reasoning behind the scheme.

From your letter your concerns relate specifically to the scope of the consultation and the fact we did not consult on alternative modes and routes. This scheme has a significant history and we have been consulting upon a range of proposals since 1993. Until 2004 a range of routes were in existence and subjected to in-depth assessment.

In 2004 it was determined that, under existing environmental legislation, the alternative routes to the south and west of Lancaster could never be built due to the potential impact on the estuary. In recognition of this, and in line with Communities and Local Government (CLG) Guidance for consultation, we could not present alternative route options while aware that they could never be built. The guidance states that "Above all, it must be clear what is being consulted on. Promoters must be careful to make clear what is settled and why, and what remains to be decided, so that the expectations of consultees are properly managed." It would have been a waste of resources and would have risked confusion and antagonism if we had presented 'options' that would never be constructed.

Alternative modes of transport have also been considered under previous studies, including the often referred to Faber Maunsell Report of 2008. This report concluded that the Heysham to M6 Link was key to reducing the influence of traffic through Lancaster and recommendations for alternative measures were made in addition to, not instead of, the link road. In addition, following the Planning Inquiry in 2007, the Report to the Secretary of State for Communities and Local Government concluded that, "the objectives of the Scheme cannot be met by alternative measures and that a new road is accordingly required." It is for these reasons that alternative modes were not presented or suggestions sought.

While we did not actively seek comments on these points, many were received and have been included and addressed within our Consultation Report, submitted as part of our application to the IPC.

Cost of the Scheme

The local authority’s total spend commitment on all transport schemes over the next four years is £186 million – of this, only 9% is allocated for the Link Road scheme. This contribution also attracts £111 million investment from central government. This £111 million investment is money that would not be available to the county without the link road project. This scheme is also vital to promote regeneration of some of the most economically deprived regions of the county, helping to promote further financial investment in the future. If the Link Road were not built, these monies would not be transferrable to alternative services or facilities.

Continued...
THE dispute between Mike Jacobs (letters, January 12) and Steve Luckles (letters, February 9) over the likely increase of traffic created by the Halton filter for the proposed M6 Link can be simplified. The crucial issue is that the extra traffic flow would be concentrated on the High Road and Church Brow, exactly where the changes are most hazardous. Promises to address the dangers relating to Church Brow are idle, since if any significant improvements were indeed feasible they would have been on the table long ago. The problems are in truth intractable.

Far more misleading is Mr Luckles’s reference to what he calls “our village survey” which had presented itself as a “ballot” to establish “the complete Halton view”. Mr Luckles, an outspoken enthusiast for the M6 Link, wrote the four-page leaflet which included a yes-or-no section for return. This propaganda by “ballot” featured a lengthy highlighted column of four “key arguments in favour of the link” and then six lines of “arguments against”. The Mayor, who attended a parish council meeting at which it was discussed, rightly referred to the whole document as “extremely biased”. Returns were unsigned, and one person present had a clutch of papers freely obtained from a local shop. Even some of those in favour of the link acknowledged the damaging lack of transparency, and a number of villagers refused to participate in such an obviously flawed exercise. It was clearly unsound and without merit.

Many in Halton see it as an attempt retroactively to construct the appearance of consultation about the filter road which had never honestly taken place prior to the LCC’s submission of their plan. That is a serious concern for the forthcoming IPC enquiry referred to by T E Askew (Protest if you don’t want road, February 16).

Keith Hanley
Cans Lodge
Halton