

IPC Examination : Heysham M6 Link.

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Unique ref no. 10014346

Questions to the Examiner

The reasons for registering these questions arise from the fact that most of the changes to the previous scheme presented by Lancashire County Council disadvantage the residents of Halton in a disproportionate way. The questions are prompted because deleterious consequences for Halton appear not to have been assessed or addressed.

It will emerge that many of these negative impacts would not exist if the slip road to a Shefferlands roundabout were omitted from the scheme. Other deleterious effects however, such as noise, air and light pollution from a roundabout raised out of a 14m cutting to field level and a Lune bridge raised from low to high level would still remain.

The questions assume greater significance in view of the e-mail letter from Mr.M.McCreesh to Mr.and Mrs.Potter dated 22ndJuly 2011 in which he acknowledges not having been aware, before the Halton Exhibition, of the dangers presented to people using Church Brow. He wrote:

“Finding out important information like this is an important part of the consultative process. Whereas there has been intensive survey work within and immediately adjoining the site of the proposed road as you move away from the scheme our knowledge is less comprehensive... this is particularly true of areas where we are not carrying out any physical works...”

It follows from this admission that up to this point no assessment had been made of dangers to public safety in the vicinity of the scheme. These questions we will therefore ask for audits, surveys and assessments which the applicant should have completed since that date.

Road Safety:

Lancaster District Core Strategy 2003-21 E2 plans to take through traffic out of residential and commercial areas. The 2008 baseline report states the scheme would remove through traffic from residential communities, reduce road casualties and improve air quality. SPG 14 states schemes should improve the actual and perceived road safety for pedestrians and ensure new schemes are pedestrian friendly. Para 6.1.13 of the TA states that the flows in the village will be reduced and improve pedestrian safety, para 6.2.10 says the same for cyclists. Para 8.2.4 and table 8-4 set out the assessed impacts on the village: they do not include the increase in traffic on High Road and say overall traffic would reduce and improve safety for pedestrian and cyclists.

Q1.

Halton Road is a C class road linking the Skerton Area along the north side of the river through Halton Village to Caton in the east. It runs parallel to the A683 which runs along the south side of the river connecting the same areas for inter-urban and through traffic i.e. part of the national primary route network. How does the design meet the policy aims and the statement made

when the local road network of Halton Road and Church Brow are to receive a 74% (4600 AADT to 8000) increase in traffic and High Road an extra 20% (4900 to 5900 AADT), whilst the A683 has a 24% (9500 to 7200 AADT) decrease to the east of the M6? Furthermore, how does the design meet the policy aims and the statement made when the C class routes, that will see significantly increased traffic flows, form the old part of the village, have alignments with severe restrictions and absent or extremely narrow footpaths? It appears from the review and comments made that the designers do not know or understand the character of the road through the village. This judgement is reinforced by the lack of any pedestrian or cyclists' data in the pedestrian and cyclist surveys and assessment report.

This question assumes crucial importance in view of the fact that the shifting of traffic from a primary route to a difficult minor road through the historic conservation area of the village could be a calculated plan to lessen traffic pressure at the sub-standard motorway junction 34 (which is not the responsibility of Lancashire County Council but the Highways Agency) thus designedly and disproportionately affecting the safety and character of Halton.

These subsidiary questions also arise from such a shift in traffic to the village:

Did LCC officers deliberately inform villagers at the Halton exhibition that the consultation was "only about mitigation measures we are taking such as landscaping and noise reduction" in order to forestall examination of this serious issue?

While alleged economic benefits at the west end of this scheme have been emphasized by the developer is it not also true that the damage to those living along its length and to the safety and quality of life of residents at Halton have not been addressed and would seriously corrode such benefits, off-setting them in a significant manner?

Q2.

Will the examination take note that:

The TA sets out the traffic implications but does not provide the AM and PM flows/turning movements for the Halton Road link junction or the link flows through the village and the mini round about, these are required to understand the peak period affects on motorised and non motorised modes?

Q3.

a) What evidence does the applicant offer for the assertion that people in Halton asked for a link from Halton to the roundabout in 2001 and how many people does such evidence show asked for such a road? It should be noted that at this time no impacts or traffic flows changes were provided to enable an informed view to be made.

b) Since at the 2001 exhibition the plan showed no link and therefore no consequent changes in the traffic flows in the village, how can the applicant infer that Halton residents would still have made the same comment even if they were apprised of the consequences?

Q4.

The agreement between the Highways Agency and LCC as agent sets out the basic description of the works in the area of concern, it indicates that various elements are departures from the

DMRB guidance, no details of the rational for the departures has been provided. Given that the application design is seen as the final design the safety audit procedures should have been instigated covering Motorway junction, Church Brow, Halton Road and High Road area. This would be in the form of a stage 2 audit with designers response. Have these been submitted to the examiner?

Q5.

Since Halton Road and Church Brow are to receive a 74% (4600 AADT to 8000) increase in traffic and High Road an extra 20% (4900 to 5900 AADT), what evidence has been presented in an Audit that the consequences for safety on these stretches of road have been adequately addressed when the accident analysis clearly shows accidents for pedestrian, cyclists, cars and HGV/PT modes in the village area?

Q6.

a) Has a Road Safety Audit properly addressed, in relation to Church Brow, the tight bends which unsight drivers and pedestrians, the narrowness of the carriageway which at these bends causes vehicles to cross over the double white lines (especially large vehicles), the high stone walls which edge the road and absence of pavement on one side and the narrowness of the pavement on the other (at the Tower House it is reduced to 68cm necessitating a dangerous detour with prams and mobility vehicles onto the road at the most dangerous point)?

b. Can any Road Safety Audit demonstrate that pedestrians on the south pavement near Tower House will not be at greater risk, due to traffic increase, of being hit by a vehicle on the curve?

At present the wing mirrors of many vehicles, especially larger ones, and the front ends of longer vehicles such as buses, coaches, and many commercial vehicles pass over the narrow pavement as they turn. This happens as drivers try to avoid oncoming traffic which in its turn tries to avoid collision with the graveyard wall. To avoid pedestrian fatality this issue must be addressed by the applicant.

Q7.

Has a Road Safety Audit correctly assessed the major traffic increase on Church Brow for the resulting severance between the two sides of the village? On one side will be the Parish Church, the White Lion car park and its changed use redevelopment and cottages opening directly on to a narrow pavement while on the other will be many houses and more cottages also opening directly on to a narrow pavement. Such severance will cause aggravated dangers.

Q8.

Has a Road Safety Audit correctly assessed how safety will be affected on High Road (the centre of the village life) due to a significant traffic increase? This question is of great importance to people in the village because the increase in traffic will have a high negative impact due to the road being a bus route, a route for primary and secondary schools' coaches and buses, a pedestrian and cycle route to the primary school and its crossing point, due to its having a factory with delivery difficulties because of lack of space, a butchers' shop (which has had to have bollards placed outside to protect its awning from being torn away by passing vehicles) and to protect pedestrians from vehicles mounting the pavement here (due to the narrowness of the

carriageway and on street parking) a group of shops, a pharmacy, a Post Office and a doctors' surgery.

Crucial to this question is that on- street parking fills much of High Road due to the housing being terraced. There are areas of High Road where this fact makes it dangerous or impossible for two vehicles to pass each other. Alongside Kirby Terrace is one such considerable length. On the rise above the mini roundabout this situation is aggravated because a vehicle can commit itself to driving up the hill while a vehicle descending from the top cannot be seen. In these areas it is commonplace to witness vehicles driving on the pavement. With such a traffic increase these characteristics of High Road make a Road Safety Audit necessary.

Q9.

Traffic flow forecasts seen by local people are for daily flows. Since traffic in the village is highly concentrated at peak times we ask whether the Road Safety Audits have examined the consequences of peak flow on safety?

Q10.

The TA section 8.3.8 and 8.3.9 provide the outcomes of the assessment of the two signalised junctions. These are assessed as standalone junctions but are only separated by the M6 overbridge i.e. the two junctions will operate as one and the capacity will be affected by the storage area between the two sets of signals along Caton Road. In order to provide a full appreciation of the impacts and capacity (which are not currently provided) should not the two junctions be assessed as one linked junction?

Q11.

Since Halton Road, under the motorway bridge, is prone to flooding, what evidence has been presented that this problem will not affect access to the nearby junction? This is of greater concern as the drainage catchment for the road and link is part of the catchment G set out in the drainage report, however the road is some 14m below the roundabout. As such, how can it drain into the same network?

Q12.

Has the applicant's offer of installing mirrors opposite house entrances on Church Brow and promise to look into the possibility of a speed limit (there is already an advisory 20mph, reflecting bollards and double white lines and yet the problems remain) been correctly assessed for feasibility and effectiveness in meeting the dangers presented by the increase in traffic?

Q13.

If the above two measures, even after much local pressure on the LCC, are the only mitigation that can be conceived, does this not demonstrate that the physical design of Church Brow makes the problem presented by such traffic increase intractable and the only solution to preserve safety is to remove the link between Halton Road and Shefferlands?

Q14.

Since any offered or possible mitigation measures are ineffective would not the LCC and the examiner come to the conclusion that the residual effects in Halton are severe as set out in the NPPF and as such the link road should be removed to comply with policy?

Q15.

Would the examiner please assess the following point? It is clear that commuters going south (the most common route to work) to the M6 from Halton will continue to use Denny Beck rather than negotiate three sets of traffic lights and a roundabout. The link to Shefferlands therefore seems to have as its purpose relief of pressure on Junction 34 rather than benefit to people in Halton. The scheme is seen as of little benefit but of severe detriment to people in Halton and the LCC claim that the increase of traffic on Church Brow shows how popular the scheme would be for villagers is seen as spurious.

Q16.

Has the examiner received an assessment of the dangers presented at the mini roundabout on Church Brow by the increase in traffic? The question arises from the fact that its layout and position forces larger vehicles to cross over it when turning and makes for other traffic choosing to do so in preference to negotiating a steep turn.

Q17.

Since the new junction on Halton Road looks problematic has the examiner received a detailed junction assessment which addresses the difficulties of approach along Halton Road due to the hills and curves on either side of the junction, and the incline between Halton Road and the roundabout which over its short distance must have level lengths at its base and before its crest thus increasing its gradient notably?

Q18.

In designing the Halton end of this road scheme LCC is acting for the Highways Agency. Is the examiner satisfied that the Agency has approved the details of the plan as it applies in Halton?

Q19.

Has the applicant presented to the examiner a full assessment of the built environment at Church Brow which is a Conservation Area and where walls, gate piers, residences and the Parish Church are all listed, ancient and, in the case of the walls bounding and retaining the road, in a delicate state due to traffic vibration? Have effective mitigation measures been planned to preserve Halton's historic heritage from traffic damage and from the canyon effect at this point on noise and air pollution?

Q20.

In view of the fact that Halton will suffer from a significantly increased noise and air pollution a detailed noise and air pollution assessment of the village is necessary, the wider modeling has no base data from the village and as such is not believed to reflect the local conditions. The extra impacts will come from a Shefferlands roundabout which has been raised out of a 14m cutting to close to field level and from the northern section of a Lune bridge which has been raised significantly from the previous design level and placed an incline of 4.6 percent where heavy goods vehicles will be braking and accelerating so creating noise at varying frequency carried over water by the prevailing wind. The increase in traffic has not been assessed in the village area.

Has such a study been done to assess the impact on the lives of residents from these two sources? Assurances to Halton residents that the "background noise" of the M6 would mask

noise from such a bridge is not believable but leads residents to suspect that no such preparatory work has been carried out.

Q21.

Does the examiner agree that the scheme as it stands significantly advances urbanization of the rural village of Halton through a combination of traffic increase, greater danger on its principal roads, noise and air pollution around its houses, traffic lights on Halton Road, increased signage (and possible pedestrian crossings as mitigation) making a deleterious change in what has been a comparatively safe and quiet rural environment?

Environmental Impact:

Q22.

It appears that the AQ Assessment was conducted using advanced dispersion modelling. However, there is no reference to the model used (e.g. ADMS-Roads, ADMS-Urban, Aermot, or other). Although this is a minor point, it should be documented in the interest of clarity and reproducibility of modelling results.

Q23.

The report makes reference to several guideline documents (e.g. 'Local Air Quality Management: Technical Guidance' TG(09) (DEFRA) and Environmental Protection UK's 2010 document: 'Development Control: Planning for Air Quality'). These reports detail what is generally accepted as industry "best practice" and include reference to the met data used.

The met data used in the assessment was collected at Blackpool Airport (very flat Fylde coastline). While this data may be OK to use, a description of how representative they are of prevailing conditions in the vicinity of the proposed development is missing. Also, given the number of sensitive receptors that a proposal of this size impacts on, one year of met data is insufficient as it will not capture annual variations in local meteorology and could potentially under/overestimate the impacts of a scheme on local air quality. By way of example, Local Authorities across the UK have reported significant increases in pollutant concentrations for 2010 due to the adverse winter conditions experienced across much of the UK, which resulted in a significant number of exceedances of the annual NO₂ objective. Indeed, Table 7.3 shows that similar effects were recorded in Lancaster. As such, I ask the examiner as to how representative the modelled concentrations are of worst case conditions, after all we are talking long term chronic effects as well as short term effects on human health?

Q24.

Dispersion modelling was conducted for a baseline year of 2008, but no reference is made to verifying the modelling results against measured data.

Model verification is a critical component of any modelling exercise as it gives the user a chance to assess if the model is under/over predicting and allows them to tune the model to achieve a high level of confidence in the modelling results. Therefore I ask the examiner as to whether model verification was undertaken and where this has been documented?

Q25.

Knowledge of the local area by the dispersion model user is clearly lacking with regards to sensitive receptors on Church Brow/Halton Road.

Only one receptor on Church Brow was identified in the report (11 Church Brow). While it would be particularly onerous to document emissions at every roadside property affected by the development, the selected residence is not representative of this section of road as it is raised and set back from the carriageway. Also, and perhaps more importantly, had a site visit been undertaken of the road it should have become apparent that the section of road directly downhill of the 11 Church Brow is a classic street canyon and is subject to pollutant recirculation and build up. This is particularly important as this road is subject to a quite severe gradient which adversely affects vehicle emissions.

Therefore why were street canyon effects not accounted for on Church Brow as part of the AQ Assessment.

Q26.

Vehicle fleet composition is an important consideration in any dispersion modelling exercise and doesn't appear to have been taken into consideration here.

While the national fleet data for rural roads will estimate the heavy duty vehicle (HDV = HGV + Bus + Coach) to be no more than a few percent of total traffic, following development of the link road this may well change in favour of increased HDV movements. This is an important consideration for an AQ Assessment as an increase of a few percent in HDV movements can seriously affect air quality at roadside receptors, a particularly relevant point when considering Point 25.

Therefore can the applicant clearly demonstrate that representative vehicle fleet composition was accounted for in the AQ Assessment for Halton?

Q27.

In view of the fact that a wide swathe of trees will be felled on the river bank (designated as a biologically important site) in order to accommodate a new bridge and another large number along a northern link to the M6, has the applicant given an estimate of the number of trees to be felled and described how this damage in the Green Belt will be compensated by replanting on the basis of three trees for each removed? The same question is posed for the removal of many trees along the proposed northern slip way to the M6.

Q28.

The Environment Agency has reported increases in otter presence in the lower Lune in the 2000-2002 period and a further improvement between 2008-2010. Mr. John Wilding at the Boat House Halton has indicated that he will present a detailed and up-to-date log of hundreds of sightings together with CCTV film to the IPC. The most recent otter survey by LCC seen to date was written in 2003.

Has a recent otter survey been presented to the examiner in order to comply with the provisions of the Wildlife and Countryside Act (1994)? What is its quality of the survey? (the ADAS survey

commissioned by LCC in 2003 fell short of being professional on many counts – it used only a spot check rather than a linear search, the study was carried out from the bank and not by boat from the river which is essential when searching for signs of otters, it did not show its methodology i.e. what signs it was looking for or in what way evidence was collected). Consequent to an otter survey, have the necessary licences been presented to the examiner?

Road Safety:

Presented below are a number of photographs that have recently been taken to illustrate the characteristics of Church Brow as well as the significant dangers presented to users of the road.



Figure 1 – The geography of Church Brow, illustrating tight blind bends, narrow pavement (68cm width), residential accesses and retaining wall.



Figure 2 – Geography of Church Brow leading to Halton Road.



Figure 3 – Geography of High Road illustrating parked cars along single carriage way and poor line of sight to mini-roundabout.



Figure 4 – Pedestrian having to enter the road on Church Brow as pavement width (68cm) is inadequate for pushchairs.



Figure 5 – Pedestrian waiting for a clear road to enable a pushchair to be safely navigated along Church Brow.



Figure 6 – Pedestrians in the road returning from a Church Service on Church Brow .



Figure 7 – Pedestrians and parked cars after a Church Service on Church Brow.



Figure 8 – Pedestrians leaving the main entrance at St Wilfred's Church on to Church Brow.



Figure 9 – Church goers leaving a car park on Church Brow, exiting on a blind bend.



Figure 10 – Illustration of daily traffic movement on Church Brow.

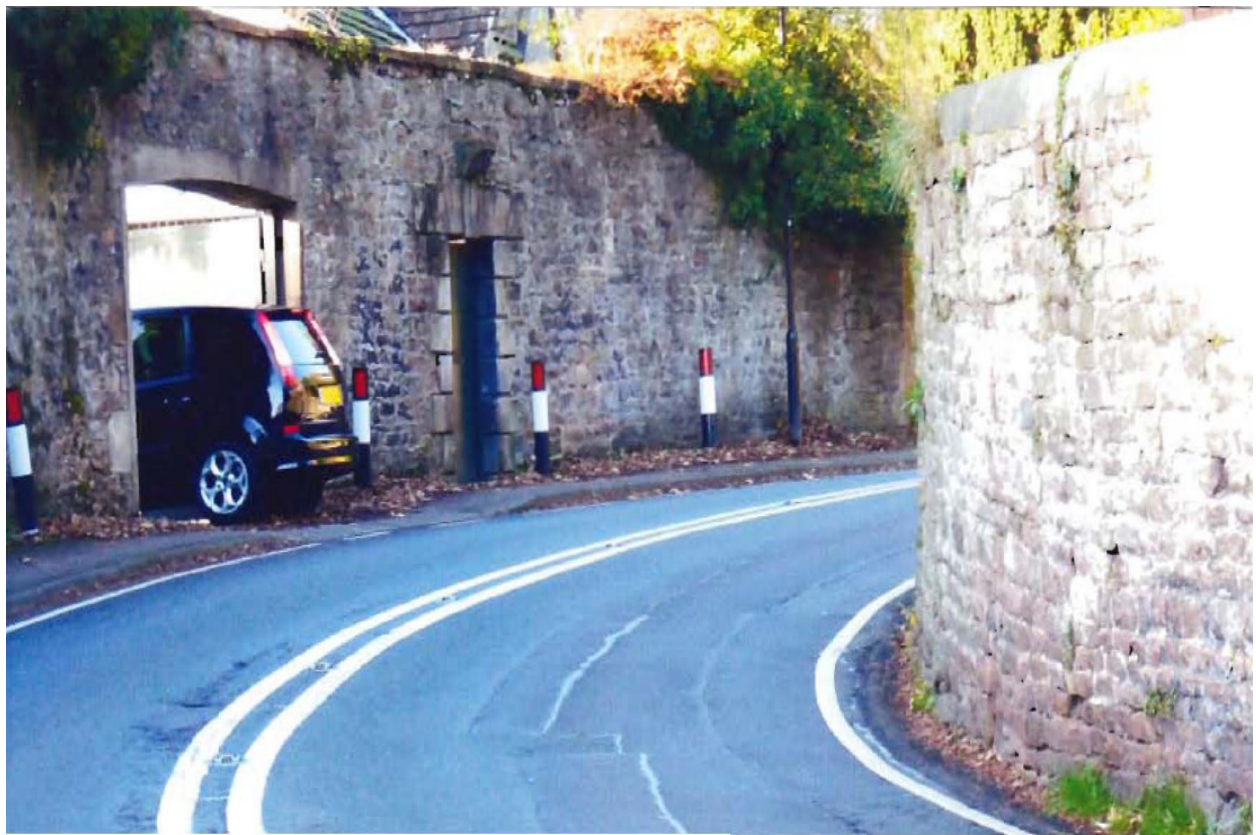


Figure 11 – Vehicle exiting a residence on Church Brow on to the crest of a blind bend.

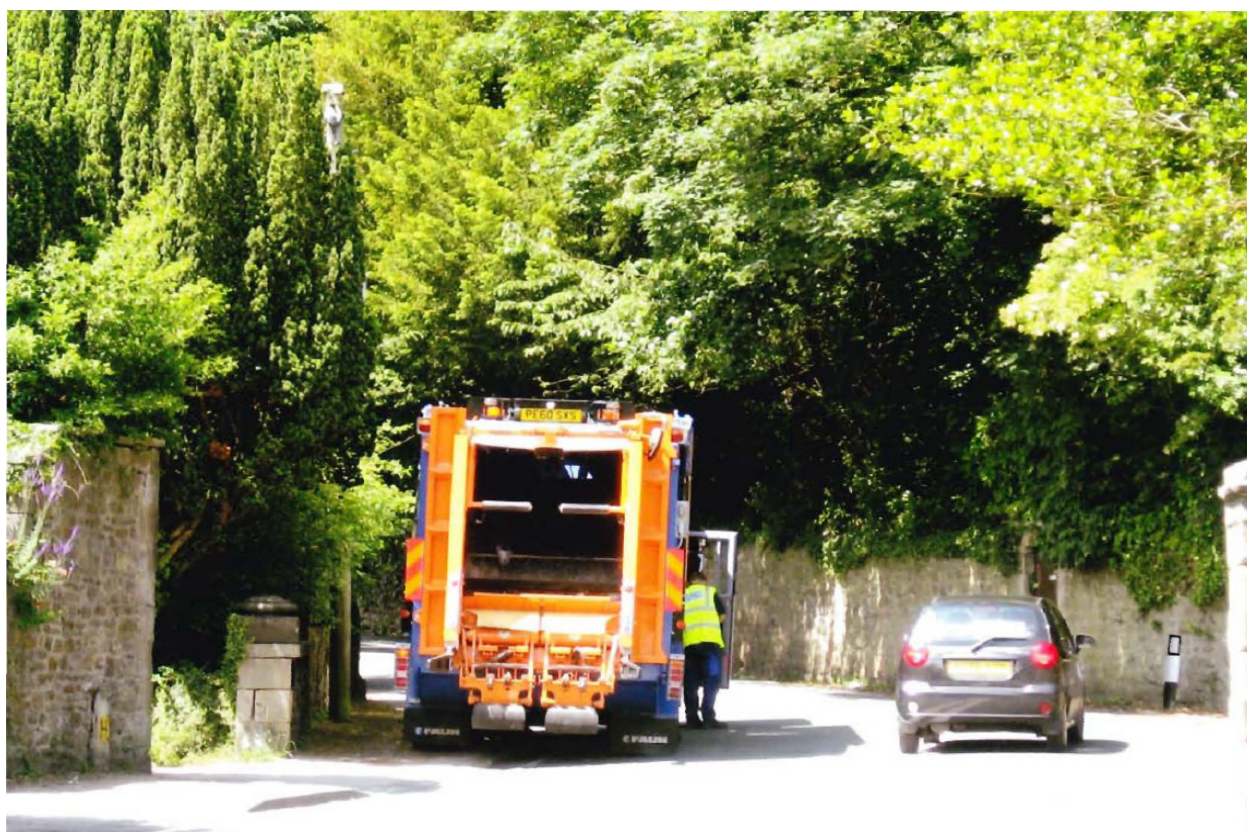


Figure 12 – Refuse vehicle parked on the pavement and road during a collection on Church Brow. Vehicles are required to cross blindly on the opposite carriage way to pass.



Figure 13 – Resident attempting to leave courtyard on Church Brow.



Figure 14 – Utility works on the bend of Church Brow.

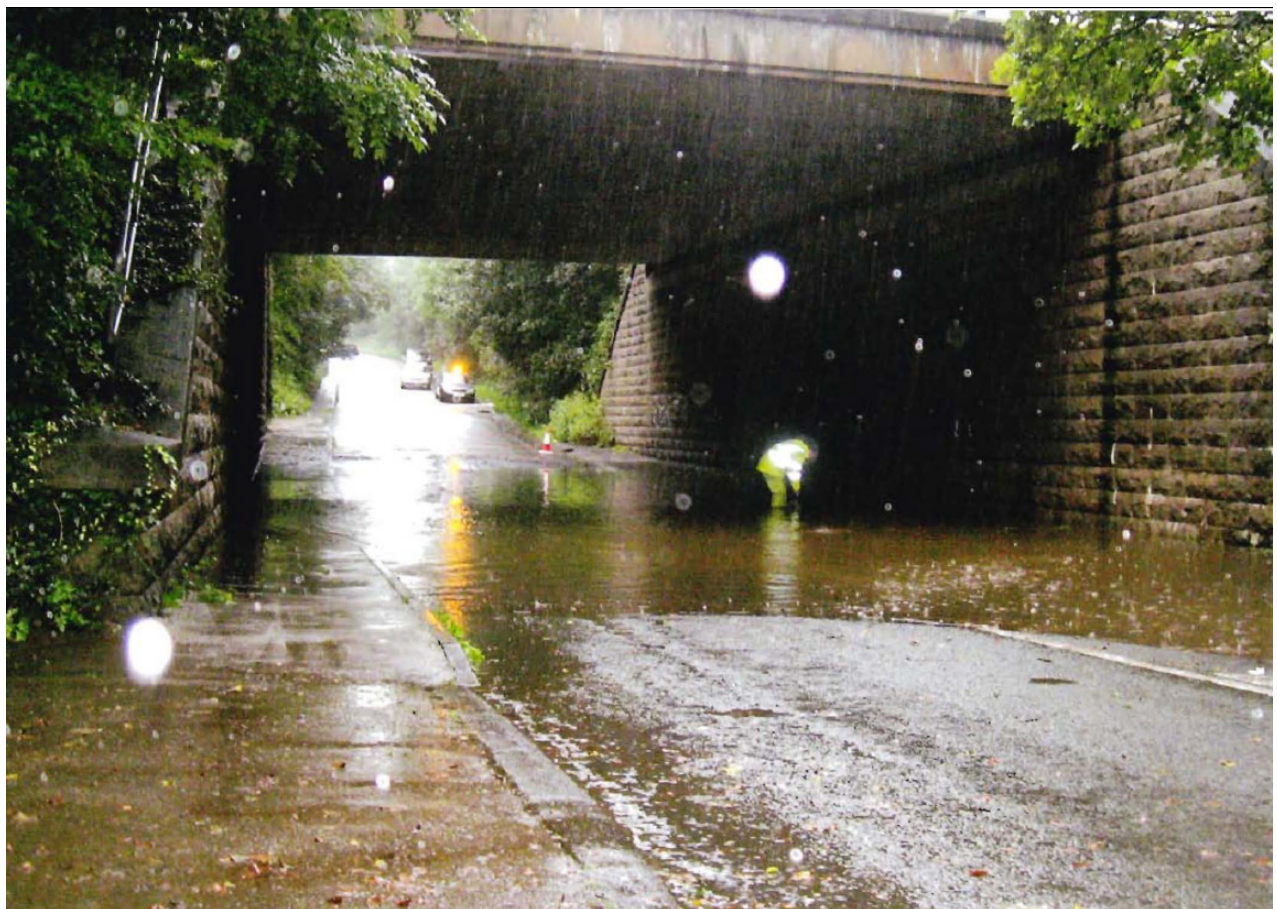


Figure 15 – Church Brow closed due to flooding on 06.09.11.