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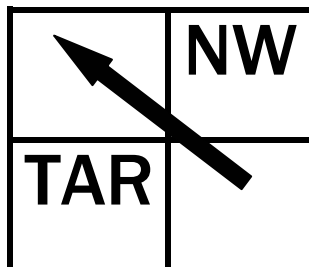
NON-COMPLIANCE OF

THE MERSEY GATEWAY PROJECT

with the North West Regional Spatial Strategy

by

North West Transport Roundtable



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Contents

	Page
Introductory Comments	3
The Vision	3
Our Region	3
Policy Context	4
Spatial Principles	4
Regional Spatial Framework	4
The Coast	5
Locations for Regionally Significant Economic Development	5
Retail Development	5
Health, Sport, Recreation & Education Services Provision	5
Integrated Transport Networks	5
Managing Travel Demand	6
Natural Environment	6
Remediating Contaminated Land	6
Integrated Water Management	7
Liverpool City Region	7
Conclusions	7

INTRODUCTORY COMMENTS

Since Halton MBC prepared its planning and Transport & Works Act applications for the Mersey Gateway project, the North West Regional Spatial Strategy has been published. It was issued by Government Office for the North West on September 30th, 2008.

The North West Transport Activists Roundtable (NW TAR) contend that this project does not comply with significant parts of the RSS, which is part of the Development Plan.

THE VISION

The Vision aims to deliver sustainable development ... which will contribute to the reduction of carbon dioxide and other greenhouse gas emissions by 2021. The Mersey Gateway project would not achieve either. The development plans being canvassed by Halton MBC are the antithesis of sustainability and a new road bridge would merely encourage more road traffic and therefore more harmful emissions.

OUR REGION

The north-south crossing of the River Mersey in Halton is not part of a Trans European Route Network. Consequently it is difficult to understand how an environmentally damaging scheme costing almost £1 bn. can be justified. Nor are any of the problems identified in the transport paragraph in this RSS section (2.11) relevant to this crossing.

Building a massive new road bridge would not deliver sustainable economic growth and there is no guarantee it would tackle the social inclusion problems of the area. Most notably, the plan to build the Mersey Gateway is at odds with the environmental aims as outlined in para. 2.16, ie: *“From an environmental point of view, it is important to not only develop the North West as a better place to live, but also to make a more substantial contribution to national and global targets and initiatives.... We must also deal with dereliction, improve air and water quality; manage the fabric of towns and cities and sensitive coastal and rural landscapes; protect wildlife, increase tree cover and find more sustainable ways of dealing with waste”.*

Liverpool City Region

Halton is not part of the key focus for economic activity in the Liverpool City Region – the regional centre is. In fact, it is not even mentioned in paras. 2.22 and 2.23.

Rural and coastal areas

What is mentioned in this part of the RSS is the importance of conserving estuaries which are internationally renowned for their bird life (para. 2.29).

POLICY CONTEXT

The most important national strategy with which the Regional Spatial Strategy is required to align is the UK Sustainable Development Strategy. NW TAR contend that the Mersey Gateway project does not concur with the national strategy's priorities for climate change, natural resource protection and enhancement of sustainable communities (para. 3.1). It also fails to concur with the region's own sustainable development framework, 'Action for Sustainability' which – in planning terms - is supposed to be treated on a par with the Regional Spatial Strategy and the Regional Economic Strategy.

SPATIAL PRINCIPLES

The primary RSS policy is DP1 on Spatial Principles. These underpin the entire strategy. NW TAR maintain that the Mersey Gateway would definitely fail to meet the following:

- promote **sustainable** communities
- promote **sustainable** economic development
- make the best use of **existing** resources and infrastructure
- **manage** travel demand, **reduce** the need to travel
- **promote** environmental quality
- **reduce** emissions and adapt to climate change

REGIONAL SPATIAL FRAMEWORK

Policy RDF1 on spatial priorities lists priorities for growth in the region. Runcorn and Widnes are both regarded as a third priority, along with a host of other named towns and cities. The policy says *“in the third and fourth priorities development should be focused in and around the centres of the towns and cities. Development elsewhere may be acceptable if it satisfies other policies, notably DP1 to 9. Emphasis should be placed on addressing regeneration and housing market renewal and restructuring”*.

This policy is described as *“the cornerstone of RSS”* from which decisions will flow on development, investment and regeneration. It should be noted that NW TAR supports the need to invest in and regenerate Runcorn and Widnes. However, it does not believe that building a new road bridge between them with all the environmental downsides associated with it - and placing a charge on the use of the new bridge (and the continued use of the old one) - is the way to do it. Halton MBC are maintaining that providing the bridge would bring investment and regeneration to Runcorn and Widnes. This is an enormous assumption and 'leap of faith' to make. (It did not happen with Hull and the Humber Bridge). We also believe the Mersey Gateway would fail to satisfy policies DP1 to 9. (DP 5 is 'Reducing the Need to Travel'). It is for Halton MBC to prove beyond reasonable doubt that the bridge would achieve what they say it will.

THE COAST

NW TAR contend that key aspects of Policy RDF 3 on The Coast would be flouted if the Mersey Gateway were built, notably:

- **enhance** the economic importance of the coast and the regeneration of coastal communities **in ways that safeguard, restore or enhance and make sustainable use of the natural, built and cultural heritage assets of the North West Coast ...”**
- **protect** the functional integrity of bays, **estuaries and the inter-tidal areas ... “**
- **promote the conservation and enhancement of** cultural, historical and **natural environmental assets**, including land and seascapes

(See our response to the Environmental Statement).

LOCATIONS FOR REGIONALLY SIGNIFICANT ECONOMIC DEVELOPMENT

Halton is not mentioned in Policy W2 – Locations for Regionally Significant Economic Development - yet the promoters of the Mersey Gateway scheme claim that significant economic development would be attracted to Halton if the new bridge were built, even though business would have to pay to use both the new bridge and the existing one. This logic defies good business sense. Why locate where extra charges are imposed?

RETAIL DEVELOPMENT

Halton is not mentioned in Policy W5 on retail development.

HEALTH, SPORT, RECREATION & EDUCATION SERVICES PROVISION

RSS Policy L1 emphasises the importance of easy access to health, sport, recreation and education services provision but the fact of the matter is that, in deprived communities such as those which exist in Halton, they would be disadvantaged by having to pay to cross the river to access these services. There is no guarantee the franchisee will offer exceptions or lower rates for local people. Mersey Travel would challenge if they did.

INTEGRATED TRANSPORT NETWORKS

Policy RT1 – Integrated Transport Networks – requires that *“Transport problems and issues in the region should be examined on a multi-modal basis to develop sustainable, integrated and accessible solutions for all users”* and also *“Plans and strategies should seek to make best use of existing infrastructure”*. The Mersey Gateway, formerly the New Mersey Crossing, was always envisaged as a road crossing, although an unadopted version included light rail on a second tier. Alternatives have been summarily dismissed.

MANAGING TRAVEL DEMAND

The policy on Managing Travel Demand – RT2 – requires that transport authorities should work with the Highways Agency on any proposals that affect trunk roads and *“In particular efforts should be aimed at reducing the proportion of car-borne commuting and education trips made during peak periods and tackling the most congested parts of the motorway network including the M6, M56, M60 and M62”*. It should be noted that, although the Highways Agency have been consulted by Halton MBC and the Halton plans reach to junction 12 on the M56, the Highways Agency claim to have no plans of their own to amend this junction or alter the M56. Also, the scheme proposals do not include a plan to reduce peak hour traffic. In fact any plans to reduce traffic on the new bridge would be counter to it being an attractive economic proposition to a franchisee.

Policy RT2 also requires that *“Plans and strategies will need to be specific to the nature and scale of the problems identified, set clear objectives and specify what is being proposed, why it is necessary and what the impacts will be”*. The question needs to be posed – have they in fact done this as exhaustively as they should in respect of impacts on the M56 of creating a new strategic route from Cheshire to Liverpool?

This policy also places an obligation on transport authorities to *“seek to reduce private car use through the introduction of ‘smarter choices’ and other incentives to change travel behaviour which should be developed alongside public transport, cycling and pedestrian networks and service improvements”*. In effect, the smarter choices agenda is one on which Halton MBC is particularly weak.

NATURAL ENVIRONMENT

The Mersey Gateway scheme does not concur with the key requirement in Policy EM1 (B) on the Natural Environment which is: *“Plans, strategies, proposals and schemes should secure a ‘step-change’ increase in the region’s biodiversity resources by contributing to the delivery of national, regional and local biodiversity objectives and targets for maintaining extent, achieving condition, restoring and expanding habitats and species populations. This should be done through protecting, enhancing, expanding and linking areas for wildlife within and between the locations of highest biodiversity resources, including statutory and local wildlife sites, and encouraging the conservation and expansion of the ecological fabric elsewhere”*. In its response to the Environmental Statement, NW TAR drew attention to the limited area of the River Mersey which had been examined as part of the research work for this project. It was nowhere near adequate to provide sufficient information and to meet the necessary requirements.

REMIEDIATING CONTAMINATED LAND

The problems of remediating contaminated land (Policy EM2) are very acute in Halton, which has been the centre of the region’s chemical industry for decades. Part of this project involves using the most contaminated land for the toll booth areas.

INTEGRATED WATER MANAGEMENT

Policy EM5 on Integrated Water Management requires compliance – amongst other things - with the EU Water Framework Directive, River Basin Management Plans, Catchment Flood Management Plans and the Regional Flood Risk Appraisal. NW TAR explained in their response to the Environmental Statements that part of Widnes is in the flood plain and that they had serious concerns about compliance with these issues.

LIVERPOOL CITY REGION

Whilst some of the statements in the Liverpool City Region policies undoubtedly sweep up issues in Halton, it is interesting to note that Halton is not named and neither is the Mersey Gateway. However, Policy LCR1 does specifically require the protection of *“existing environmental assets in line with DP7 and EM1, in particular sites of international importance for nature conservation such as Mersey Estuary”*.

As indicated in its response to the Environmental Statement, NW TAR is deeply perturbed by potential impacts of the Mersey Gateway on the sites downstream of international and national importance.

CONCLUSIONS

There are sufficient instances of non-compliance with the recently adopted RSS for there to be grave doubt about the validity of progressing with the Mersey Gateway scheme. It is an enormously costly project in monetary and environmental terms and claimed economic and social benefits are very fragile.

The RSS is a statutory document and schemes and plans must comply with it. Inadequate evidence appears to exist to show that the benefits of the scheme to Halton would outweigh the environmental and social disbenefits and make it acceptable for it to go ahead in spite of the many areas where it is out of alignment with national strategies and the RSS. It should not be approved.