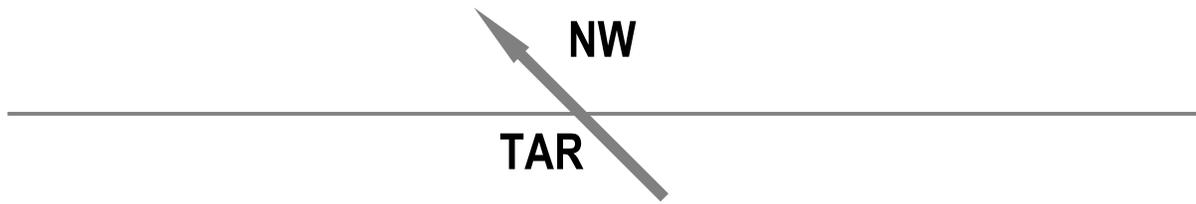


Opening Statement by
The Alliance
comprising
the North West Transport Roundtable



and



for the
MERSEY GATEWAY PROJECT
PUBLIC INQUIRY

May 2009

INTRODUCTION

My name is Lillian Burns. I am representing the North West Transport Activists Roundtable and Friends of the Earth who have come together to form 'The Alliance' to object through the auspices of this inquiry to the Mersey Gateway Project being promoted by Halton Borough Council.

The NW Transport Roundtable (NW TAR), of which I am the Convenor, is an umbrella body which operates under the auspices of the Campaign for Better Transport (formerly Transport 2000). We represent organisations and individuals who believe in sustainable transport, better land use and a low carbon future and we focus on regional and sub-regional transport and planning policy work. We were founded over 10 years ago along with equivalent roundtables in other regions with the support of Regional Government Offices and pump-priming funding by the then Countryside Agency (now Natural England). I came to the NW TAR via my voluntary planning and transport work for the Campaign to Protect Rural England (CPRE). I am not here in a paid capacity.

Friends of the Earth was formed nearly 40 years ago. It is both a charity and a limited company. Its aim is a healthy planet and a good life for everyone on it. It stands for three 'big ideas': (1) *There is a tomorrow*. This means living within the limits of the natural world. (2) *Everyone gets a fair share*. Everyone, everywhere, now and tomorrow, deserves to have a good life. (3) *Change the rules*. We need to change the rules so that the economy works for people and the environment, not pit one against the other. FOE's primary representative at this inquiry is its NW Campaigns Co-ordinator, Frank Kennedy.

It is a struggle for environmental NGOs such as ourselves to engage in an inquiry such as this, particularly in the present economic climate, but the fact we are here is testament to how strongly we feel about this project.

THE FORGING OF HALTON'S CASE AND THE ALLIANCE'S PERCEPTION OF IT

The idea for an extra road bridge across the River Mersey between Runcorn and Widnes goes back originally to before Halton Borough Council was formed. There are mentions of it in old Cheshire County Council papers. This dates to a time

- when building roads was seen as a good idea and there was no requirement to exhaustively test alternatives
- when there was an unquestioning assumption that new road space would lead to a booming economy
- when rising CO2 emissions and climate change concerns were on very few people's agendas and there was no Act of Parliament in place requiring a reduction in emissions
- when environmental legislation and the evidence base for transport infrastructure interventions were far less demanding than they now are

It is not a surprise the concept emerged in a different era and gained some momentum in the first place.

It is an anachronism that it is still being promoted now that all these things do apply and some 15 years after the case was established - and accepted by the government - that providing more highway capacity ultimately leads to more traffic and 10 years after the UK government accepted the fact that there is no automatic connection between providing new road space and economic benefit. Indeed new roads can suck a workforce away from an area. And this at a time when governments around the world have accepted we have to reduce greenhouse gas emissions and tackle climate change and we cannot go on living as unsustainably as we have been doing.

The Alliance's expert witnesses will show that the Mersey Gateway project is a classic case of a solution having been decided upon to solve problems that do exist – particularly social and economic problems - and of evidence then having been assembled retrospectively to support that solution.

That is an out-moded approach. The 21st century take on this is that transport is a derived demand, not an end in itself. Current government's guidance requires that first of all the problems are identified and analysed and then consideration should be given to what is trying to be achieved before a series of possible options are identified and tested.

For clarity, The Alliance would like to say at the offset they understand only too well that Halton has economic, social and health and contamination issues – all of which need to be dealt with – but we question whether building what Halton Borough Council describe as an 'iconic bridge' is the answer.

THE MATTERS

The inspectors have asked us, in our opening statement, to address the 15 'matters' identified by the Secretary of State for Transport about which he said he would like to be particularly informed and, in addition, to address the equivalent issues raised by Government Office for the North West for the Planning and Listed Building Applications. Because of the way this application has been brought forward, partly under Transport and Works Act Orders and partly under normal planning procedures, it falls under two government departments – the Department for Transport and the Department of Communities and Local Government. This means that the inspectors are in effect, the embodiment of two Secretaries of State during these proceedings.

First of all, the DfT requirements.

Matter 1 which was identified was: The aims and objectives of, and the need for, the proposed Mersey Gateway Project.

It is apposite to point out that the aims and objectives vary slightly depending on which Halton documentation you refer to but-taking the list posted on Halton's Mersey Gateway website at the time we wrote our Statement of Case-we demonstrated in it that the aims did not link across well to the key principles in the Regional Spatial Strategy and they contravened some.

There also appears to be some confusion over whether the new road space would be a strategic route or not. The Department of Transport as it was then could not find a case in the early 1990s for a strategic river crossing at this point. Mr. Nicholson, Halton's Project Director, explains to us in his proof of evidence that the main purpose the Mersey Crossing Group took over the "the scheme" in 1994 was to provide local traffic relief to the existing Silver Jubilee Bridge but also to provide wider economic benefits to the sub-region.

However, adjoining local authorities, the passenger transport authority for Merseyside and the two corporate bodies which provided support letters for the proof of Mr. Parr, Halton's chief executive, clearly see the new road bridge as a strategic route which will help them to funnel more traffic in support of their operations and for their economic benefit through Halton. Where is the benefit to Halton in this? Well, whilst there would be no benefit to be gained in terms of pollution, odour, nuisance and severance of the through traffic there actually is an economic benefit to the local authority from the way the scheme has evolved – they would have a new source of income which they do not currently have coming in from the tolls on the Silver Jubilee Bridge.

What if an extra income could be secured but without the dis-benefits? It could – by imposing a very modest toll on only on the existing bridge with a very token charge or a free concession for local residents. That charging regime – which would not be subject to market forces as the present proposal would be - would still suppress sufficient overall traffic to make the need for a new bridge redundant and therefore there would be none of the downsides that represents. Local people would also benefit from better air quality, less traffic noise and nuisance and new funding to improve the public realm, public transport and incentivise economic growth. It makes no sense that this option has not been modelled.

Matter 2 was the justification for the Council’s proposals, inc:

- a) the extent to which they are consistent with national, regional and local planning, transport and environmental policies;
 - b) the anticipated transportation, regeneration, environmental and socio-economic benefits of the project
 - c) the main alternatives considered by the Council for the proposals and the reasons why these were rejected in favour of the chosen proposals
- a) On consistency, The Alliance set out a plethora of policies with which the project does not comply in its responses to the planning application, to the Transport & Works Act application, in its Statement of Case and in its document ‘Non Compliance with the Regional Spatial Strategy’ which was appended to the Statement of Case. This is by no means an exhaustive list of documents we quoted but it included two Transport White Papers, key planning policy documents but most notably the primary one – PPS 1 and its Climate Change supplement, the Climate Change Act, the UK’s sustainable development principles, the region’s sustainability framework, the extant Regional Spatial Strategy and the NW Climate Change Action Plan.

b & c) The anticipated transportation, regeneration and socio-economic benefits will be tackled for the Alliance by two expert witnesses.

Professor Alan Wenban-Smith, will challenge many of the economic assumptions such as

- the extent to which Wider Economic Benefits (WEBs) from agglomeration are likely to arise in the particular circumstances of Liverpool City Region
- the appropriateness of the methods used by consultants on behalf of Halton BC to estimate such effects and the lack of the required level of testing related to this.
- The extent to which such benefits represent additional economic activity/add to GDP
- Whether the Regeneration Areas defined for the purpose of the EIR are appropriate in terms of regional economic policy relevance and DfT guidance
- Whether sufficient precautions have been taken to avoid double counting between transport benefits, WEBs and regeneration benefits
- Whether there could be countervailing economic dis-benefits from dispersion of economic activity as a result of wider locational choices enabled by the Mersey Gate-way Bridge (the two-way road effect referred to earlier).

Mr. Keith Buchan, will question the single-mindedness with which this particular perceived solution of a new bridge has been pursued, virtually to the exclusion of real alternatives.

He will also be challenging the application of DfT guidance and the traffic modelling and he will be attempting to un-ravel confusions relating the use of average daily traffic flow figures – some pertaining to seven day weeks and some to mid-week days - and the lack of testing of smarter choices.

Most pertinently he poses the very salient and sensible question – why has no modelling been carried out on the concept of adopting a token charge on the existing bridge? He points out that such a charge could be used to deliver a first class public realm and better public transport.

A new transport offering could include for instance a railway station in Widnes on the West Coast Main Line and a shuttle bus into the centre. Meanwhile existing projects such as the Halton Curve could be brought forward, facilitating sustainable strategic movements. Mr. Buchan will also be attempting to get to the bottom of the actual cost of the entire project. Not just the bridge – all associated works as well - when full optimism bias is applied. It would appear that when all infrastructure works are taken into account and, looking to the time when it could all be built, the overall cost would be closer to the one billion pound mark than the half billion pound one. This has impacts on the cost and benefit analysis and the payback to a concessionaire – if one could be found.

One thing we need to keep in mind is that this entire inquiry process is a theoretical debate about a huge piece of infrastructure for which a concessionaire may not be found. And, any concessionaire would not only be taking on what we contend is a commercially questionable project but one which involves building in a highly contaminated area that has been a chemical industry hub for a century. I will return to this later.

This 'Matter 2' seeks clarity on anticipated benefits. There are numerous economic and environmental benefits promised by the promoters along with this scheme. Indeed, during the inspectors' site tour on Friday, they were pointed to some examples including, for instance, an extension to a nature reserve. We would enquire, why cannot many of these initiatives including that one proceed in any event?

Would it not actually be more appealing to commercial interests to locate in the area if they either had no road tolls to contend with or they only had nominal ones, controlled locally, and these very modest tolls were being used to improve the built and the natural environment?

Matter 3 asks the inquiry to address the likely impact on the environment of building and operating the Mersey Gateway Bridge and its approach roads and Matter 4 asks about the likely impacts of constructing and operating the Mersey Gateway Bridge and its approach roads on flora and fauna, etc

I said I would return to the contamination issue. Whilst there are now many rules and regulations which apply to chemical production and how its airborne and other waste by-products are dealt with, this was not the case for much of the time the chemical industry has existed here. And, as if this was not sufficient cause for concern at site specific locations, there needs to be an understanding of the fact that the river was used as the means of disposing of large amounts of contaminants for generations. That included much of the waste from temporary mustard gas production units thrown up during the two World Wars. In addition, there is what in some ways is an even more extraordinary legacy to contend with. We know that at least one of the chemical processes carried out here, that of making soda ash for the alkali industry, produced a by-product contaminated with metals. It was called 'galligu'. Galligu was used to infill land, ditches and watercourses all over Runcorn and Widnes. Halton's own expert witness on this subject can only guess that 10 million tonnes was liberally spread around!

The same witness talks of "elevated concentrations of contaminants", principally arsenic, lead and sulphates. These are in many areas. The Oxford dictionary of Chemistry says of arsenic: "*Arsenic compounds are accumulative poisons*". Cross-check that with a medical book. I used one called 'Toxicology Recall' aimed at fourth year medical students. It does not

even have a suggestion to make as to what to do about arsenic poisoning, the effects of which are too awful to recount. It merely suggests removing a person from the source of the poisoning, 'supportive care' and 'cardiac monitoring'.

Less prevalent but found in certain locations were exceedances of petroleum hydrocarbons, polycyclic aromatic hydrocarbons semi-volatile and volatile organic compounds and asbestos. All hydrocarbons, according to 'Toxicology Recall' can cause aspiration risks but aromatic hydrocarbons are more prone to being absorbed into the system.

Asbestos as most people know, is a carcinogen which once inhaled remain in the lungs for a lifetime.

These are just some of the problems a concessionaire would have to deal with. Many commitments are of course made in terms of remediation and mitigation for both contaminants and impacts on flora and fauna and that is to be expected. But these promises assume the scheme is going ahead. The Alliance contend it would be a folly if it did. In any event, in this case a third party would be in charge of building the scheme. It would not be a local authority project.

Matter 5 relates to the Mersey Estuary Special Protection Area and Ramsar site, etc ...

The sustainability appraisal scoping report admitted the likelihood of environmental disbenefits on the adjoining nationally designated areas as a result of disturbing the river bed during construction. But this has not been addressed because no Appropriate Assessment has been carried out.

European Directive 91/43/EEC (the Habitats Directive) on the Conservation of Natural Habitats and of Wild Fauna and Fauna requires that any plan or project not directly connected with or necessary to the management of a designated habitats site, but

likely to have a significant effect thereon, either individually or in combination with other plans or projects, be subject to an Appropriate Assessment of its implications for the site in view of the site's conservation objectives.

European Directive 2001/42/EC also requires reasonable alternatives and the significant effects of all options to be examined. But in this case serious examination of alternatives has been confined to different alignments for a road bridge, not to exhaustive investigation of alternatives to road building. So, neither of these EU Directives have been complied with.

The hydrodynamics paper lodged by Halton B.C. conceded that the bridge's support stanchions in the river could have an effect on the flow of it but the Alliance have not seen any detailed environmental model which extends to the reach of the tides, ie. upstream as far as Warrington and downstream as far as the Mersey Estuary. If no thorough investigation of this scale has been carried out, then we would question how anyone is expected to judge the full potential environmental benefits and disbenefits. Certainly, we do not have the financial wherewithal to pursue this; we are reliant on Halton's commissioned work and that being in the public domain.

Matter 6 concerns itself with the likely impacts of constructing and operating the Mersey Gateway Bridge and its approach roads on businesses, residents and traffic, etc.....

Construction impacts will obviously be huge and long-lasting but, if the pain were worth the gain, it would be a different matter. This is not the case here because, as The Alliance's witnesses will demonstrate, claims for huge economic benefits are not based on sound foundations.

It is apparent that many businesses on the Astmoor Industrial Estate are not exactly ecstatic about the proposal and neither are residents who would be most immediately affected.

There are promises of extra tree planting to attempt to ameliorate new sources of extra road noise for some local situations, which would be necessary any way to help absorb the extra CO2 being emitted. But, it would be true to say that most residents have accepted at face value promises made for the new bridge by the promoters. They have been told repeatedly for many years that the new bridge would bring jobs and inward economic investment and it would relieve areas which currently suffer from problems with HGVs from those impacts. We challenge the claims.

I have alluded earlier to the fact that we will be taking on the economic claims. Regarding the claims pertaining to HGVs. If a concessionaire could be found to build the new bridge, it is fair enough to wonder why they would behave any differently than the concessionaire has with the M6 Toll Road. Surely they would price off HGVs because they would not want the much higher maintenance costs of carrying them – especially on a bridge which, as Halton know only too well, is many times more expensive to maintain than a normal stretch of road. And why would the freight industry react differently to this piece of tolled roadway than they have to the M6 Toll Road? The evidence of the M6 Toll Road shows us that, unless they have to, hauliers won't use it.

What can we say to the adjoining local authority - Warrington, and to the Highways Agency who are responsible for the M6 Thelwall Viaduct except watch out – you won't know what has hit you if this new bridge gets built and it is tolled.

Matter 7 enquires whether the measures proposed by the promoters for mitigating any adverse impacts of the project are satisfactory.

The Alliance's response to that would be another question.

We would point to the fact that as all the necessary research work has not been carried out, European Directives have not been complied with, DfT appraisal requirements have not been fully met, there have been inadequate sensitivity tests and the health impact assessment does not address the needs and problems of the local area – how can we know whether the mitigation measures proposed are adequate?

Matter 8 asks about the conditions that should be attached if the project goes ahead.

The conditions must seek to impose the highest possible standards of operation and on-going testing on land and in the water in order for public safety to be assured and the least possible environmental damage to be wrought.

DLA Piper, the lawyers for Halton Borough Council have asked The Alliance to consider the matter of 'conditions'.

This is a difficult issue because, of course, we do not wish to see the project progress at all. However, we recognise that this is an essential part of the process. We are still discussing this amongst ourselves and would be obliged if we could please be permitted to lodge our response to this after we have heard all of Halton's case.

Although we have, of course, seen Halton's proof of evidence, it could well prove to be the case that hearing the full case presented, issues may occur to us which have not to date. We would like to leave this request with the inspectors.

Matter 9 addresses the proposals for funding the cost of the project and enquires whether the project is reasonably capable of attracting the necessary funding.

The costs of developing the scheme have been assigned through the Regional Funding Allocation, round 2, which currently rests with the DfT awaiting their sign-off. However, as the region's aspirations for major schemes far outweighs the funding available, if the go-ahead were not given to the Mersey Gateway, there is a rather long waiting list of other schemes lined up waiting to step in to take up that allocation.

On the costs of building the Mersey Gateway scheme, the government have said that this must come through road user pricing. This scheme has just 27 years to cover its costs and make a profit for the concessionaire. It is due to open in 2015 and the concession is due to run until 2042 after which the toll income and the bridge costs would revert to Halton Borough Council.

The project director's own figures place the cost at three quarters of a billion pounds based on net present value. Any concessionaire, it would appear, has almost no leeway on what his base charges will be. Public transport is to go free, and cars and motor bikes are to equate with the Mersey Tunnels. In any event, Merseytravel's support for a new bridge is dependent on charges not being higher – as this would place too much pressure on the Mersey Tunnels – and not being lower as this would take business away from them.

What the concessionaire would do about HGVs is very much open to speculation as I have said. However, Halton have committed to driving a hard bargain as to what local people would be charged. With all these constraints and such enormous overheads, there has to be a serious question over whether any concessionaire would or could agree to such terms. Might there be other development incentives which need to be added to make this an attractive proposition?

However, one thing is certain and that is that a huge amount of strategic traffic would have to use this bridge to make it viable. The Silver Jubilee Bridge, we are informed, would be disconnected from the strategic road network, making it less easy to access and it would be primarily for local use.

So, we come back to a question I posed at the beginning which was – what is this route for?

It is certainly not classed as a major strategic route in the Regional Spatial Strategy. In there it is rated as a non-trunk route of regional importance, the lowest of four ranking after (1) trunk routes of strategic national importance, (2) other trunk routes of national importance and (3) trunk routes of regional importance. It is not a trunk road and there are no plans for it to become so. If there were, it would pass into the province of the Highways Agency.

Matter 10 enquires further about the case for charging tolls for the use of the Mersey Bridge and for introducing charges for use of the Silver Jubilee Bridge, etc ...

I have already addressed this to some extent, but the two expert witnesses employed by The Alliance will be tackling this in much more detail.

Matter 11 is about Side Road Orders and Matters 12 & 13 are about land acquisition. At this stage we do not wish to make any comments on any of these issues.

Matter 14 asks about the adequacy of the Environmental Statement submitted with the applications for the Orders and degree of compliance with the statutory procedural requirements.

The Alliance do not consider the environmental preparatory work and the Environmental Statement were adequate.

This is apparent from what I have already said and from our response to it which was appendix 3 in our Statement of Case. The North West's Integrated Appraisal Toolkit was not utilised and a major failing in the environmental case so far presented is the inadequacy with which climate change has been tackled, particularly bearing in mind that part of Widnes is in a flood plain.

The findings of the Stern Review into the economics of climate change appear to have played no part in the development of the scheme and nor does the statutory national target we have now to achieve an 80% reduction in CO2 emissions below 1990 levels by 2050. This project proposes to reduce from four to two the number of traffic lanes on the Silver Jubilee Bridge in order to encourage cycling and walking. However, it proposes establishing what in effect amounts to a new motorway in all but name – six lanes of traffic and a hard shoulder on a massive new piece of infrastructure which in itself would use huge quantities of aggregates and minerals.

As our expert witness, Keith Buchan, will demonstrate, this project is headed in completely the wrong direction to tackle climate change.

The 'bar' relating to sustainability requirements has risen significantly since this scheme was first conceived. The UK now has five guiding principles on sustainable development

- Living within environmental limits
- Ensuring a strong, healthy and just society
- Achieving a sustainable economy
- Using sound science responsibly and
- Promoting good governance

And the bar has gone up even more recently with the publication of two DfT command documents, '*Towards a Sustainable Transport System*' (TaSTS), published in 2007, and '*Delivering a Sustainable Transport System*' (DaSTS), published Nov. 2008.

Both emphasise the need to significantly reduce harmful emissions.

All of these appear to have been of little moment in Halton's plans, along with the European Directives quoted earlier.

Matter 15 refers to any substantive changes to orders. We are not currently aware there are any.

Finally, I will address the Government Office for the North West matters.

a) Asks if the proposed development accords with the development plan for the area. I tackled this issue in my proof of evidence in response to Halton's planning witness and whilst I conceded that new road bridge crossing received endorsement in all local development documents, I listed numerous instances where it did not comply with the Regional Spatial Strategy.

I believe I proved, therefore that it does not accord with the development plan.

b) Asks if the application accords with the provisions of Planning Policy Statement 1. Again I tackled this in my proof of evidence and again I believe I proved it does not.

c) Enquires whether the development is consistent with Planning Policy Guidance 2 on Green Belts. This policy requires a special case to be proved before infringing on Green Belt as this project does, both in the river area and near the M56 junction 12. The Alliance believe that Halton have not proven their case for this road bridge and therefore they have not made the case for decimating what little Green Belt Halton has in its central urban area.

d) Enquires about consistency with Planning Policy Guidance 17 on Open Spaces, Sport and Recreation.

The project would appear to be inconsistent with this planning policy which requires that open spaces, sports and recreational facilities should not be built upon until an audit has been conducted of what exists at present and what future needs are. The audit must show that any open space is surplus to requirements.

Has this been done? It is not apparent it has been and the Green Belt area in particular is an area of value to the local community.

- e) Enquires whether full consideration has been given to PPS9 on Biodiversity and Conservation.

A key principle of PPS 9 is to prevent harm to biodiversity and geological conservation interests.

With this proposal there seems to be an assumption that because the alignment chosen for the new road bridge is over a polluted stretch of the river which does not have the highest conservation designations, impacts will be minimal. But, as Halton's own hydrologists explain, the River Mersey is dynamically tidal and this area adjoins areas with special designations. As no Appropriate Assessment has been conducted, it is unknown what the impacts would be.

- f) Checks compliance with Planning Policy Guidance 13 on Transport. The Alliance would strongly contend this is not complied with as a key objective is to "*reduce the need to travel, especially by car*" and it requires active management of urban growth to make the fullest use of public transport. These objectives will not be achieved by removing two lanes of sub-standard highway and replacing them with six lanes of motorway-level highway. This entire project will do anything but "*reduce the need to travel*".
- g) Enquires whether the applications will have significant impacts on features of archaeological importance, listed buildings and Conservation Areas in relation to the provisions

of PPG 15 on Planning and the Historic Environment and PPG 16 on Archaeology and Planning.

We would certainly contend in response to this query that the existing listed structures of the Silver Jubilee Bridge and the railway bridge would be significantly diminished.

- h) Asks whether the applications have fully taken into consideration the requirements of PPS 23 on Pollution and PPG 24 on Noise, with particular regard to the reduction in air quality and the impact of noise and vibration.

Our expert witness, Keith Buchan, will tackle air pollution but, to summarise, air quality would worsen. On the question of noise and vibration, certainly the local residents closest to the proposed new infrastructure believe these would be an issues, judging by their evidence, but The Alliance will not be presenting evidence on this.

- i) Again asks about conditions and again I would lodge the same plea for more time as before. According to the programme, Halton BC will finish giving their evidence on Friday May 29th.

The Alliance would be obliged if they could please present their list of conditions on the resumption of the inquiry on Tuesday June 2nd.

- j) Finally, there is a catch-all question on "*and other relevant matters*".

The Alliance contend that this is an out-dated scheme which bears no relationship to today's sustainability agenda and which does not stand up to serious scrutiny. There can be no guarantee that the hoped for economic benefits will be delivered and there are many environmental unknowns.

We have many unanswered questions, namely:

We question:

- why the inquiry does not have before it evidence of traffic modelling options which shows varying levels of traffic suppression on the Silver Jubilee Bridge through the imposition of different toll levels on it, ie. options that examine not building a new bridge and explore charging non-local traffic everything from the comparative fee for the Mersey Tunnels, currently £1.40 & £2.80 for cars and light goods vehicles respectively for a one way journey, to lesser tolls that model both charging a very token fee for local residents and giving a free concession. (It is worth noting here there is a Ship Canal road bridge to the east of the M6 Thelwall crossing at Warburton for which the charge is 20p).
- why many of the improvements promised in association with the Mersey Gateway project could not be delivered regardless of whether or not that scheme is delivered, particularly if there was a new funding stream from a modest road charging regime on the existing bridge?
- Why would new businesses be attracted to an area where non-local employees, suppliers, customers and staff have to pay market price toll fees every time they used adjacent road space?
- why the detailed hydrodynamic modelling work did not extend to the full extent of the tidal range of the Mersey?
- why some European Directives were not followed?
- why some DfT technical guidance was not followed?
- why a non-specific health impact assessment was carried out in an area with so many health/contamination issues?
- Why were cycling and walking not modelled?

The government itself has accepted that we cannot build our way out of transport problems. Halton should plan instead for sustainable alternatives with no risks to health and zero impacts on climate change for the sake of future generations.