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**FAO – Highways England**

**VIA EMAIL:  
A5036portofliverpool@highwaysengland.co.uk**

Dear Sir or Madam,

**A5036 Port of Liverpool Access Scheme – Public Consultation**

**Response from Sefton Council**

***Introduction and overview***

Sefton Council is the local authority within which these scheme proposals are located and as such we recognise our role as a key stakeholder. We also recognise our significant responsibility for advocating for the prospects and well-being of our communities and this is foremost in the provision of this response. We have detailed below our response to the consultation but want to make it clear from the outset that we do not support either of the options you have supplied. From the limited information supplied we believe that both options have significant negative impacts on our communities. They fail to balance the positive benefits of economic growth with the environmental, health and wellbeing and social impacts.

In our view you have treated this exercise as a technical road building process rather than seeing the real impact of the proposals on local people. The “online” option is a shadow of the previous option with no assessment of how the impact of additional traffic will be mitigated. It does not appear future proofed or indeed “present proofed”. The Rimrose Valley options removes vital green space provision and threatens environmental and ecological systems which local people enjoy and which

supports their health and wellbeing. Your process also fails to present the evaluation of those options previously rejected by Highways England, including a tunnel option, and therefore lacks transparency and a desire for real engagement with local people. These issues are discussed in more detail below.

The Council has recently completed a major consultation exercise on the Sefton 2030 vision, which has identified 8 aspirations for the future of the Borough. The consultation currently presented by Highways England has been considered in the context of the Sefton 2030 vision. The vision is illustrated in the accompanying document.

The Council is acutely aware of the potential opportunities for economic growth associated with the growth in the Port of Liverpool and associated businesses and this is particularly welcome in an area that has and continues to experience significant economic challenges. The Council also recognises the vital importance of providing good, multi-modal transport links to the Port and the surrounding area to enable those opportunities to be realised. The Council supports the development of rail, coastal shipping and inland shipping opportunities as an essential and key part of the provision of future transport access for the Port. It is unfortunate that the relevant national agencies have failed to co-ordinate a true multi modal solution to this issue and that we are faced with considering an improvement of the highway route only. It should also be recognised that this route does not only serve the Port of Liverpool. A considerable volume of the traffic is related to commuter journeys to the wider Liverpool City Region.

The A5036 already suffers from peak hour congestion, junction capacity being exceeded, unreliable journey times, a poor safety record, poor air quality and community severance. We want to see an outcome that provides for the needs of all users of the corridor, supports Sefton businesses and protects and improves the environment and health and wellbeing of local communities.

The Council acknowledges that there are major difficulties and challenges in developing a highway improvement scheme in the A5036 corridor. Nevertheless, it is our responsibility to support the interests of our local communities and to try and secure an option that both provides sufficient highway capacity to address existing problems and provide for future demand whilst at the same time protecting, and where possible improving, the health and well-being of our communities. Whilst we accept this is a difficult balance to achieve, we believe that it is both possible and frankly essential. Our concern with the current proposals, however, is that we do not consider that either of the options being consulted on will achieve that balance.

### ***Quality and scope of information***

Sefton Council has significant concerns about the quality and scope of information presented as part of the public consultation. As we have considerable experience of engaging and consulting with the public, we understand the need to keep the information being presented at a manageable level, so that it is clearly understandable. However, there is so little detail being presented in this consultation that it appears to be very superficial. This could have been addressed if the more detailed technical assessments (or summaries of them) had been available at the same time as the consultation, but we understand those reports were not available. As a consequence, it is not possible for us to make an appropriate technical assessment of the adequacy and conclusions of the detailed assessments. This is in our view a fundamental flaw in the process.

The Council is also extremely disappointed that information has only been provided about two options. The impact of the options being considered is presumably considered against a forecast baseline situation and we would have expected that information would have been provided about what the condition of the route would be in the future if no improvement scheme was introduced. The

Council is also aware that the “online” option has changed significantly since an earlier public engagement in February 2016. No details of any of the previous options have been supplied or the reasons why they have been changed or rejected. Details of all previous options and the reasons for any changes should have been included in the consultation.

In particular Highways England will be aware that the Council considers that the option of a tunnel linking the Port and the Motorway system has merits and the Leader of the Council and the MP for Bootle have made representations to the Secretary of State for a more detailed consideration of this option. We assert that the results of the financial and technical assessment of a tunnel option should have been made available and that the public and other stakeholders should have been given the opportunity to comment on that option. It is vital that those who will be affected by the proposals have confidence that all potential options have been properly assessed and that the process for deciding on which option should be taken forward is both robust and transparent. The option of a tunnel is something that local people are aware of and it is something that should have been included in the consultation. This represents a fundamental flaw in your process as far as Sefton Council is concerned

### ***Key issues for Sefton***

As described above, the Sefton 2030 vision provides the context for the consideration of future highway access along the A5036 corridor. The Council is seeking to achieve the best possible balance between facilitating economic growth whilst at the same time protecting the health and well-being of our communities.

The issues that are particularly important for us are :

- Economic growth, jobs, regeneration and development potential
- Delivery of the Local Plan – housing and employment sites
- Community health and well-being, health inequalities and safety
- Local environmental conditions, particularly air quality
- Landscape, recreation and amenity
- Quality and resilience of transport and other infrastructure

The information provided in the consultation does not have enough detail for us to assess the impacts of the options in relation to these issues. However, based on the information that has been provided for the consultation we consider that there are serious concerns over both options being presented in relation to several of the key issues listed above and that neither option would deliver the Council’s priorities and aspirations for the area. This reinforces the position that other options including a tunnel should be included.

### ***Technical issues***

The level of information provided in the consultation and the time available for responses has meant that it is not possible for us to provide detailed technical comments at this stage. However, as indicated above, there are several areas where we would wish to make specific comments and have further discussions with Highways England about the details of all the options being considered.

We want to have the opportunity to review and comment on the technical assessment reports and to provide technical comments on specific aspects in relation to ;

- Traffic flows and future highway capacity
- Air quality and noise
- Heritage and conservation
- Landscape and amenity
- Nature conservation
- Drainage and pollution of land or water
- Road safety
- Implications for pedestrians, cyclists and public transport users
- Health and well-being and health inequalities

As you will be aware, the Council has two existing Air Quality Management Areas along the A5036 and another two in the vicinity on the A565. There are long-standing concerns about air quality in the area and the contribution of HGVs to levels of nitrogen dioxides and particulates is a major concern for the Council. The Council recognises that the growth of the Port and the resulting increase in numbers of HGVs, together with the growth of other traffic in the area, has the potential to adversely affect air quality. We also understand that this growth in traffic and effect on air quality constitutes the baseline situation that you have compared your options against. However, we need to understand the assumptions that have been made about the baseline conditions and the future air quality conditions both with and without the scheme options.

The Council is currently examining options for tackling air quality in the south of the Borough and especially along the A5036 corridor, so we need to understand the assessment work that has been undertaken so far. It will also be a priority for us that any option should make a positive contribution to air quality.

Another priority area for the Council is health and well-being. Council officers have previously raised this issue and it is disappointing that it has not been considered more in the consultation information. The health and well-being impacts of the options include much more than air quality. Both the positive and negative aspects of, for example, provision for walking and cycling, social cohesion, access to open / green space, economic opportunity, access to services and facilities and road safety are all relevant. The impacts on health and well-being are also much wider than the social and distributional impacts analysis required by the DfT guidance. The Council requests that a comprehensive health impact assessment of all the options should be commissioned in order to inform the Highways England recommended preferred option and that these issues are taken into account in the development of the preferred option. The Council is willing to advise Highways England on the scope and specification for such an assessment.

### **Summary**

- Sefton Council recognises the importance of providing good transport access to the Port and wishes to see proposals that achieve a balance between economic growth whilst at the same time protecting the health and well-being of our communities. We do not believe these are mutually exclusive. We want to see an outcome that provides for the needs of all users of the corridor, supports Sefton businesses and protects and improves the environment and health and wellbeing of local communities.
- It is disappointing that only the Highways element is being considered rather than a holistic multi modal solution.

- The Council considers that there are concerns over both options being presented in the consultation and that neither option achieves the desired balance of long term capacity improvement and environmental protection or would deliver the Council's priorities and aspirations for the area. We cannot therefore support either of the options.
- The Council also believes that a tunnel option should be presented as part of this consultation so that the public can have their say about its merits and is disappointed about the lack of information provided about all other options.
- The Council has specific concerns about the impacts on air quality and on health and well-being and wishes to see much more detail on these issues.
- There are several technical areas where we wish to make specific comments and have further discussions with Highways England about the details of the options being considered.

In conclusion Sefton Council is disappointed with the content and the process for engaging our communities on an issue of such magnitude and importance. The options presented, lack the required details and exclude options which in our view should be seriously considered. This lack of transparency is worrying and unacceptable. Unfortunately the proposed replacement of a pedestrian bridge with a crossing, on the same route, illustrates a similar disregard for meaningful communication and engagement. This will be the subject of separate correspondence. In addition the timescale for response is too short giving rise to a feeling of predetermination and a process more concerned with cost than value or the negative impacts on local people. For these reasons we cannot support either option and urge you to reconsider the options and place the needs of local people first.

Yours sincerely,



**Councillor Ian Maher**  
**Leader of Sefton Council**



**Margaret Carney**  
**Chief Executive, Sefton Council**

