

A5036 Port of Liverpool Access Scheme – Public consultation

Submission from North West Friends of the Earth (Friends of the Earth England, Wales and Northern Ireland)

1. Introduction

Friends of the Earth (England, Wales and Northern Ireland) welcomes the opportunity to comment on the public consultation for the Port of Liverpool Access Scheme, and the two options presented. We strongly oppose the two options due to the significant potential impacts on the environment, health and local communities.

Furthermore, we object to the consultation process as conducted so far which presents a narrow range of options – just two, both road, both with significant impacts – rather than a genuine choice of solutions to deal with port expansion. The two options do not present a real choice for communities, carrying as they do major negative implications for local green spaces, biodiversity, air pollution, noise, landscape and more.

Vital information on the benefits and effects used to inform the consultation brochure is not in the public domain, therefore the public are being asked to ‘choose’ a route based on limited information. A very basic summary of benefits and effects is presented, despite the next stage of the process being to decide on a preferred option and detailed design work. It is far too late to release reports containing the economic and environmental assessments *after* the public consultation has closed. If Highways England view this as a genuine opportunity for local residents to shape the decision then far more detailed information must be made available for the public consultation.

The process must be halted and non-road solutions re-assessed. The port expansion project will have long-term implications not just for the economy but also the environment, health and wellbeing in the area – non-road options must be on the table, not discounted at such an early stage.

The consultation also highlights a much broader and fundamental question regarding the focus of economic development in Liverpool City Region – can the growth plans for Liverpool port be realised without unacceptable harm on the local population, public health and environment? We strongly believe the starting point should be how to improve the health, wellbeing and environment of local communities – not least to comply with legal air quality limits – and not how to facilitate more and more road freight from the port through local communities who are already suffering unacceptable pollution.

2. Failing air quality in South Sefton

The latest Air Quality Action Plan progress report for Sefton finds that air quality objectives related to port traffic are not being met, even before further port expansion is taken into account¹:

“significant challenges remain in achieving compliance with the NO₂ annual mean Objective at AQMA 2 and AQMA 5 situated on the A5036”

For the Air Quality Management Area at Princess Way, Waterloo (AQMA 2, declared January 2009) it was found that *“The NO₂ annual mean continues to be significantly above the Objective at this location and is unlikely to be met in the short term, with the current measures that are in place and with port expansion likely to exacerbate the situation.”*

For the Air Quality Management Area at Hawthorne Road, Litherland (AQMA 5, declared February 2012) it was found that *“current measures are unlikely to bring about compliance with the AQO”*.

For both AQMAs it is estimated that there will be no compliance until 2022, although this is dependent *“on impact of port expansion on A5036 and completion date of new A5036 highways scheme”*.

We would strongly question the assumption that more road capacity and enabling more traffic will reduce air pollution in the area.

3. Air pollution, transport and health

The public consultation for the Port of Liverpool Access Scheme completely fails to take into account the context of air pollution and ill health and the UK’s legal obligations to meet air quality limits.

Air pollution is a very serious problem in the UK, and reduces life expectancy by an average of seven to eight months, with equivalent annual health costs estimated to be up to £20 billion a year.² The Environment, Food and Rural Affairs Committee, a cross party group of MPs, describes air pollution as a “public health emergency”, causing over 40,000 early deaths a year.³

Children are particularly at risk from air pollution, with epidemiological studies for the World Health Organisation showing that symptoms of bronchitis in asthmatic children increase in association with long-term exposure to NO₂.⁴ We note the high number of schools and children living in the vicinity of the A5036 and the Rimrose Valley.

¹

http://breathingspace.sefton.gov.uk/AssessRepDocs/Progress_Reports/AQAP_Progress_Report_2015.pdf

² UK Air Quality Strategy, 2007 www.defra.gov.uk/environment/airquality/strategy/index.htm

³ <http://www.parliament.uk/business/committees/committees-a-z/commons-select/environment-food-and-rural-affairs-committee/news-parliament-2015/mps-demand-action-air-quality-16-17/>

⁴ <http://www.who.int/mediacentre/factsheets/fs313/en/index.html>

Road transport is a major source of air pollution, and is estimated to be responsible for £5 - £11 billion per annum of the wider costs of transport in urban areas.⁵

Current Government proposals to deal with the UK's air pollution crisis were recently deemed illegal by the High Court.⁶ Failure to meet legal NO₂ limits puts the UK, and in turn Liverpool City Region authorities, at risk of large fines of up to £300 million.⁷

The European Commission's Air Quality Directive 2008/50/EC stipulates that limit values must be applied everywhere in an air quality management zone. It does not allow for a balancing of improvement and worsening, and air quality cannot be worsened where pollution is already over EU legal limits.

It is this context within which port expansion and associated road building or widening plans must be viewed.

4. Climate Change

The public consultation does not mention climate change at all. What are the impacts of both options on greenhouse gas emissions?

The Climate Change Act 2008 introduced a binding reduction target requiring the UK to reduce its greenhouse gas emissions by at least 80% by 2050 against 1990 levels and a reduction of at least 34% by 2020.⁸

The UK Government ratified the Paris Agreement in 2016, committing the UK to play its part in keeping global temperature rises to 1.5 degrees C. According to the Committee on Climate Change domestic transport accounted for 24% of 2015 emissions, and in order to meet the aims of the Paris Agreement these must fall by around 43% between 2015 and 2030, with options developed to allow near zero emissions by 2050.⁹

How will port expansion and associated road building or widening lead to a reduction in emissions in line with the requirements of the Climate Change Act, UK carbon budgets and the Paris Agreement?

The transport sector is a key contributor to UK greenhouse gas emissions, and as such the failure to even consider the climate change impacts of the road schemes presented is a major omission.

5. Benefits and effects of the proposed scheme

a. Air quality

⁵ Air pollution: Action in a Changing Climate, 2010

<http://www.defra.gov.uk/publications/2011/04/13/pb13378-air-pollution/>

⁶ <https://www.theguardian.com/environment/2016/nov/02/high-court-rules-uk-government-plans-to-tackle-air-pollution-are-illegal>

⁷ <http://www.guardian.co.uk/environment/2010/jun/03/uk-warning-london-air-quality>

⁸ <http://www.legislation.gov.uk/ukpga/2008/27/contents>

⁹ <https://www.theccc.org.uk/wp-content/uploads/2016/10/UK-climate-action-following-the-Paris-Agreement-Committee-on-Climate-Change-October-2016.pdf>

We struggle to see how Option A would result in “no significant impact on air quality” considering the additional road freight expected as a result of port expansion, and there is no information in the consultation brochure to support this assessment.

Option B outlines that residents living adjacent to Rimrose Valley and in the vicinity of the Port “would experience poorer air quality” but the extent of this is not revealed, nor any potential impacts on residents in Netherton, Sefton village or Ford. There is no detail in the consultation document regarding the air quality impacts, from either proposal, on children and the elderly (including proximity to schools or residential homes), who are more vulnerable to air pollution.

Friends of the Earth requested a copy of the air quality survey data which was used to base the conclusions on air quality impacts but these are not currently publicly available. There is no assessment so far as we can see on how either option would impact on legal air quality obligations. This is a major omission for a public consultation.

With the A5036 and surrounding area subject to a number of Air Quality Management Areas – two of which are already seriously breaching the air quality objectives due to port road freight (before expansion taken into account) – we view the air quality assessments as presented in the consultation document to significantly underplay the potential impacts of illegally dirty air on the health of local people.

b. Noise

There is no detail given to support the conclusions that option A “is unlikely to result in any increase in traffic noise” or to quantify the noise impacts on Rimrose Valley of option B.

c. Nature conservation

Friends of the Earth requested copies of the ecological surveys used in the Nature Conservation assessment but these are not publicly available. This is clearly a significant impact of both schemes and most starkly the Rimrose Valley bypass option. How much wetland, woodland, grassland and other habitats would be lost, and what protected species? What would the impact on local residents’ health and wellbeing be of the loss of a highly valued green space? The importance of the country park to local people, and the significance of the loss of such a valued green space for local communities, is barely acknowledged in the consultation. The extent to which the bypass would sever the country park and the sheer scale of the landscape and visual impact, noise and air pollution appears very much downplayed. We also note the loss of local playing fields.

d. Water environment

Regarding the water environment, the consultation document describes effects on Rimrose Valley Brook as “minimal” – no further information is presented as to why this is concluded. We also wonder whether this has been climate proofed, i.e. taken account of increased likelihood of extreme rainfall events?

6. Traffic forecasts

The public consultation document contains no information on traffic models used including projected traffic generated by the two road options. We also note the well documented evidence of induced traffic, which is when a greater volume of traffic is generated as a result of extra road capacity.¹⁰

7. Value for money

The proposed schemes are estimated to cost up to £41 million for option A and up to £294 million for option B, significant amounts of money and particularly so at a time when local authorities' budgets and basic public services are under pressure – do the options present value for money? What are the additional costs of air quality impacts on public health and has this been taken into account? How do the cost estimates for these two road-based solutions compare to non-road solutions? What other transport interventions could be made for the same cost?

8. Lack of non-road solutions in the consultation

Local communities have not been presented with a genuine choice. The lack of non-road solutions – and two options which both present impacts which are highly likely to be unable to be mitigated (no evidence is presented in the consultation to the contrary) – has restricted the consultation to a false choice.

9. Conclusion – Highways England need to repeat the consultation process and present a broad range of options

The next phase of the process is to go straight to a preferred option – yet the public has not even had sight of basic data on environmental and health impacts. Despite a number of surveys having already been conducted to inform the consultation document (on air, noise, environment etc) these have not been made publicly available.

Furthermore the consultation does not present any non-road solutions such as modal shift to rail and traffic reduction measures.

We believe these are major failings of the consultation process, and as such it should be repeated with the full information on costs and benefits made public, and with a broader set of multi-modal options presented.

Yours sincerely

Helen Rimmer and Polly Steiner
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¹⁰ Goodwin, P. Empirical evidence on induced traffic; Transportation Vol 23 Issue 1 1996; SACTRA report 1994,

Trunk Roads and the Generation of Traffic concluded that 'induced traffic can and does occur, probably, quite extensively' (para 10) and 'the economic value of a scheme can be overestimated by the omission of even a small amount of induced traffic' (para 12) <http://www.dft.gov.uk/publications/trunk-roads-and-the-generation-of-traffic/> ; Beyond Transport Infrastructure: Lessons for the future from recent road projects <http://www.transportforqualityoflife.com/u/files/Beyond-Transport-Infrastructure-fullreport%20July2006.pdf>