

Proof of Evidence:

Halton Resident

**Presented to the Public Inquiry
in relation to
Lancashire County Council Planning
Application Reference: 11/05/1584
Completion of the Heysham to M6 Link**

**Planning Inspectorate Reference:
APP/Q2371/V/07/1200928 &
APP/Q2371/V/07/1200929**

Submitted by Michael Jacob on behalf of:

Transport Solutions for Lancaster and Morecambe (TSLM)

- 1 I will present to this Inquiry two objections as a resident of Halton. The first objection to the proposed road will concern its effect on the village of Halton as a village. The second objection addresses the effect of the proposal on increasing levels of flooding in Halton.
- 2 In presenting the first objection I will quote the voice of the people of Halton as expressed in The Halton with Aughton Parish Plan (Appendix 1) published in December 2003 and to that extent will be speaking for them. Presenting the second objection I speak for all those who reside in the Halton Hall area, which has recently suffered damaging floods. They are in agreement with the details I outline.
- 3 The First Objection - The effect on the village as a village.

Their Parish Plan is of great importance to local people. It was supported by a £5000 grant from the Government through the, then, Countryside Agency after passing rigorous standards of public consultation. A two-year process of exhibitions, questionnaires and public meetings give the Parish Plan authenticity as the voice of the local people.
4. It is not, and would never have been funded if it were a, “not in my back yard document”. On the contrary, it sets out a future for rural development, both commercial and housing, for services, transport, and care for the environment. Groups of villagers now work to realise its aims. It forms a basis for all negotiation with developers and has been quoted by the City Planning office in a recent planning decision.
- 5 I quote from its first page: “***The proximity of Lancaster creates potential planning pressures on the rural character of the village. Local people are concerned about the danger of urban sprawl from Lancaster leading to the amalgamation of Halton village with the city.***” The danger of losing the character of Halton as a village separated from the city by green fields is shown to be a central concern for local people.
- 6 The proposed dual carriageways, roundabout and associated slip roads would remove a wide swathe of countryside, which defines Halton as a village separate from the city. Such a highway would bring with it the threat of further development along its length, increasing the effect of cementing city and village.
- 7 In their Parish Plan local people have given expression to what they most value. They are proud of the community investment that the Plan represents and of their work for an improving future for Halton. They would wish that their published view be considered in any judgment about the public acceptability of the proposed scheme.

- 8 The Second Objection is to the proposed bridge over the River Lune

All the residents of eleven properties in the Halton Hall area ask that I speak for them and present the following points. A list of residents is included in Appendix 6 and additional individual witness testimony is found in Appendices 7-9.
- 9 At Halton, the level of a one in a hundred year flood risk of 10.1 metres AOD, as estimated by Halcrow for Lancashire County, was surpassed in 1995. Higher floods are expected in the future and would increase the danger of flood-born debris lodging between the low deck, the piers and the banking.
- 10 On the night of January 31st 1995 floodwater rose 1/3rd of the way up the window of the upper floor of the Boat House, and visual evidence is included in Appendix 5. Residents were stranded and unable to escape. The roar of the water was exceeded only by the crashes of whole trees hitting against the wall of the house.
- 11 Trees, fences, and all manner of detritus was swept passed, including a caravan. Sixty metres of old stone wall were crushed. At Halton Hall a victorian oak parquet floor was destroyed. Halton Road became impassable and the public house on the opposite side of the road was badly damaged. Further downstream at the Army Training camp the Adventure Centre store room was flooded to waist depth and a line of perimeter security fencing of reinforced concrete set in concrete foundations was broken down. Staff observed heavy debris building up against the perimeter fence until it was broken down by the impetus of the flood.
- 12 We wish to correct the Halcrow report which cites only the two recent floods of 2002 and 2004 neither of which rose high enough to cause any damage at Halton. The flow for the higher of these was 833 cubic metres per second. Halcrow fail to cite the 2005 flood at 1102 cubic metres per second and the 1995 flood at 1282 cubic metres per second which rose, at Halton, to 10.25 metres AOD. We, therefore, question why Halcrow's estimate of a one in a hundred year event is only 10.1 metres, 15centimetres below a previous flood at Halton.
- 13 Flooding of these properties is becoming more severe and dangerous. Residents, therefore, together with Mitchells, owners of the White Lion, commissioned a hydrological and hydraulic survey of this part of the river from Glenn Maas to discover why. Maas gives an increase in water level at Halton of 32 centimetres due to the raising of Skerton Weir but identifies changes in land use as causing higher flooding.

- 14 The rate of rainwater runoff to the Lune has increased due to the removal of shrub cover in favour of pasture, due to the consequent erosion of soils and due to the impaction of soil with the growing intensity of grazing. The land retains less water and for shorter periods. This is a changing process, which will continue to affect river levels in the future.
- 15 A yet more powerful process is identified, namely the greater frequency and intensity of weather events. The Office of the Deputy Prime Minister stated in February 2005, "***The situation is getting worse. It is likely that river flooding will affect more areas with greater severity in the future.***"
- 16 Since Halcrow's flood risk of 10.1 metres has already been exceeded at Halton we infer that these substantial and continuing changes, that will affect our future safety, have not been factored into their estimate of future risk. The assurance of very little extra risk from this bridge design needs to be viewed in a yet wider context, that of the EA National Flood Risk Assessment for England and Wales (Oct 2004).
- 17 The Agency's map for a one in a hundred year risk generally extends, in Halton, to the 20metre AOD contour. Residents ask why Halcrow's 10.1 metre estimate is so far below that of the Environment Agency's. They wish to know whether it is because the Environment Agency has included climate change data and other processes, projecting them into the future, and Halcrow has not.
- 18 The Environment Agency assesses a one in a hundred year event to extend two thirds of the way up the steep Quarry Road and to cover the steps of St. Wilfid's Church. To the south it covers Caton Road including the northern slipway to the M6. Unfortunately this Inquiry would need another venue. The Holiday Inn would be inundated.
- 19 Residents also note with concern that Halcrow's report recommends, with extra time and budget, carrying out "extensive hydrological and hydraulic calibrations against observed events". The clear implication is that such observations have not been carried out and so have not been used in assessing flood risk. Certainly no observations have ever been made at Halton despite urgent invitations from residents.
- 20 We note that a minimum requirement of developers (PPG 25, F3.5) is a site plan giving existing information on the extent of flooding, that the information may be photographic or anecdotal and that recorded data are particularly valuable and should be highlighted together with evidence of observed trends. This minimum requirement has not been met.

- 21 Residents find it unacceptable, in view of the damage they have suffered, that the County has failed to allow budget enough to collect observed data that should have informed their flood risk assessment. Residents also know from the Maas study that no analysis of the effects of high tides on floods has yet been carried out. Very high tides completely drown out the weir at Skerton and are likely, if not certain to raise flood levels upstream. Mercifully, neither the 1995 nor the 2005 flood coincided with high water.
- 22 The danger of whole trees and other flood borne-debris lodging between deck, piers and banking increases with flood height making reliable risk assessment a necessity. To show the likelihood that the proposed bridge will increase the risk of flooding at Halton, residents point to the relative heights of the bridge deck and to the level of the 1995 flood. The height of the bridge at the piers is 11.5 metres AOD.
- 23 Halcrow's calculations are stated to have a 6% margin of error which gives a possible height from Halcrow of 10.7 metres. This would leave an astonishingly narrow gap of 80 centimetres in which trees, fences and other debris could be trapped under the deck and between piers and the banking on both sides of the bridge.
- 24 The flood of 1995 at 10.25 metres AOD would have left a gap of 1.25 metres in which the whole trees and the caravan would have lodged. The Environment Agency's one in a hundred year flood risk would rise to engulf the road surface of the proposed bridge. Residents know that the position of the piers in the riverbed will make lodging of heavy debris likely. As this happens huge quantities of lighter material build up creating a solid wall. This process can be observed along the river's length. The consequent restriction on water flow could cause a rise in levels just upstream at Halton.
- 25 Halcrow's report to the County gives cause for another concern. It gives a peak flow at 1253.8 cubic metres per second. The 1995 flow was 1182 cubic metres per second . Thus Halcrow's peak event would rise above the 1995 level of 10.25 metres causing even greater danger to people and property, a fact not considered by the County in presenting this scheme.
- 26 Halton residents have been endeavouring to obtain a reduction in the risk of flooding. They cannot contemplate any increase in the risk of flooding even if it is said to be slight. Government's policy (PPG 25) is to reduce the risks to people and to the developed and natural environment from flooding. It, therefore looks to local planning authorities to reduce the risk of flooding and the damage which floods cause.

- 27 To conclude, residents in this part of Halton judge that all available data about the on-going processes that will affect the hydrology and hydraulics of the River Lune in the future should be taken into consideration in any flood risk assessment relating to the proposed bridge. They further wish that where such data is not yet available, for instance the effect on flooding of high tides, that such analysis be completed and added to risk assessment data.
- 28 They ask that the minimum requirement of PPG 25 Appendix F2 be met, namely, that developers should “**take full account of local knowledge of flooding in the community**”. They ask that the “precautionary principle” imposed throughout these government guidelines be applied to this scheme. They know the design of the bridge is an added risk that imperils their homes and personal safety.

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Appendices attached:

1. The Halton with Aughton Parish Plan.
2. "A Hydrological and Hydraulic Assessment of Flooding on the River Lune at Halton". Glenn Maas. Oct 2005.
3. Environment Agency mapping - 1 in 100 year risk, Halton area.
4. OS Landplan Map (1:5000) for Halton showing 10 metre contour.
5. Photographs showing flood level markings for the 1995 and 2005 floods at Halton.
6. A list of 11 properties that suffered flooding and whose residents asked that the above objection be presented on their behalf.
7. Witness Statement: Dr. Mrs. M. Whitton. Halton Hall.
8. Witness Statement: Mr. John Wilding. The Boat House. Halton.
9. Witness Statement: Mrs. H. Marshall. Tythe Barn Tower. Halton.