M60 Junction 18/M62/M66 Simister Island Interchange

I object to the proposed scheme on the following grounds.

1. Failure to consider sustainable alternatives – The need for the scheme is described as irresistible as it is committed in RIS2 and in a number of National Highways (NH) documents. These are wholly inadequate reasons. Alternatives have not been assessed as per webTAG. Although 148 improvement options from different combinations of 30 highway elements were considered, there has been no consideration of how to reduce traffic, congestion, and air and noise pollution through demand management of road capacity and modal shift of both people and freight. This is essential in view of both the climate and nature crisis and the unacceptable impacts of existing road traffic and the failure of the scheme to address these issues.

I am extremely concerned that this proposal may only be start of development – PINS Feb 2021 Advice note states: *The Applicant provided an overview of the wider development aspirations held for the locality as noted in some plans and programmes which, if they came to fruition, could require further interventions to the strategic road network and consideration as part of the Applicant's cumulative impact assessment.* There does not seem to be any mention of this in ES Ch 15 cumulative impacts.

NH concludes there would be no significant impacts from the scheme at design yr-15, largely because they are not addressing the current severe impacts of the 90,000 vehicles per day at this junction on people and the environment.

2. Traffic growth – The PEIR anticipated increases of traffic (compared to baseline 2018 traffic) of 40% on the M60 and M62, and 27% on the M66 with the scheme in 2044. Which is simple and straightforward. There is nothing simple or straightforward about the presentation of traffic data in either the Case for the Scheme or the Transport Assessment. The modelling and appraisal data is missing and should be supplied.

Modelling is based on DfT's 2018 traffic forecasts [4.3; Transport Assessment 2.2]. The overall level of growth in car trips from those observed in 2018 [Transport Assessment Figure 4.2] to the three future year scenarios – 2029, 2044, 2061 - is taken from the most recent DfT National Trip End Model (NTEM) forecasts, published in August 2022. NH have taken the Core Scenario [Transport Assessment 2.6.13] which projects a 22% increase in traffic between 2025 and 2060. For the SRN, traffic flows are given in time periods within the day (AM, IP and PM) which conceals the fact that the traffic at this interchange is in the region of 90,000 vehicle movements a day. The change in AADT (ie the difference between Do Minimum and Do Something) for the SRN is given for 2029 opening year in Transport Assessment Figures which cover AM PM and Inter-Peak periods.

It is quite difficult to see a trend through the complex presentation – some flows go up, others go down and some stay the same. National Highways states that for the SRN, the highest traffic flows in the area are observed along the M60 between Junction 17 and Junction 18 in both directions, especially in the PM peak. I have therefore taken the east bound flows for this section from the figures above; they are presented in the table below.

Eastbound Vehicle Flows M60 between Junction 17 and Junction 18						
Period	**2018 obs**	**2029 DM**	**% ↑ obs v DM**	**2029 DS**	**2044 DM**	**2044 DS**
AM	5876	6888	17%	7319	7185	7637
IP	5024	6239	24%	6634	6656	7070
PM	6350	7587	19%	8154	7652	8468

From this it can be seen that traffic growth without any scheme is between 17-24% over 11 yrs which seems high, considering that (1) the DfT core scenario projects a 22% growth over 35 years and (2) congestion is a significant problem at this junction and should inhibit growth. Traffic growth without any scheme over a 15-year period between the 2029 DM and the 2044 DM is much lower than that between 2018 and 2029 - 4% in the AM, 7% in the IP and 0.8% in the PM. NH is claiming severe congestion at a junction which if nothing was done would see far more growth than that forecast by the DfT core scenario of 17%-24% over an 11-year period and then little growth over the following 15-year period. This requires an explanation.

Artificially raising the baseline growth (between 2018 and 2029) reduces the difference between DM-DS scenarios on which all assessments are made. The difference between, for example, the 2029 DM-DS PM vehicle flows is 7% whereas that between 2018 observed and DS PM vehicle flows is 28%. Growth over a 15 year period between 2029 and 2044 with the scheme in place is 4% in the AM, 7% in the IP and 4% in the PM. However growth between 2018 and 2044 is 30% for the AM, 41% for the IP and 33% for the PM. Such differences are hugely significant when assessing environmental and societal impacts.

The change in AADT for the whole day for each local road is presented on a small diagram [Transport Assessment Fig 4-4 for 2029; Fig 4-8 for 2044] with literally hundreds of AADTs overall, leading to a melee of numbers designed to confuse, obfuscate and deter people from understanding how traffic changes in the area on local roads.

3. Increased fatal, serious and slight casualties – NH aims to make the road safer for all users. It fails to do this [Transport Assessment Figure 6.2; Table 6-1]. Although the number of collisions reduces by 9, the casualties increase by 65 with a monetised safety disbenefit of -£0.36 million [5.3.7].

Scenario	Casualties over 60 yrs			
	Fatal	Serious	Slight	Total
Without scheme	110	1214	14577	15851
With scheme	111	1265	14590	15866

Increased casualties means that the scheme does not meet the requirements of the National Highways Safety Framework for the SRN or the Government's safety policy [NNNPS 4.59]. All reasonable steps have not been taken to improve safety (e.g. speed reduction, traffic management) therefore the scheme is not compliant with NNNPS.

4. Air pollution would increase – With or without the scheme, air pollution levels will still be unacceptably high and above safe limits and in some places will be made worse. This is a serious concern of Bury MBC which is the responsible air quality authority [ES Ch 5 Air Quality, Table 5.15 shows exceedances at monitored sites]. The whole of the motorway network here lies within Greater Manchester's Air Quality Management Area, the management of which has been seriously delayed. Two new air quality targets for 2040 – one for annual mean concentrations of PM2.5 and a population exposure reduction target for PM2.5 – have been set under the Environment Act 2021 [NNNPS] and The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023.However NH claims that the location of the relevant monitoring stations means these targets do not apply to the scheme. The legal requirements must be met.

The 2018 modelled baseline air quality results show that 261 out of 653 receptors recorded nitrous dioxide (NO_2) that exceed the annual limit value 40µg/m^3 [Es Ch5 Appendix 5.2]. Without the scheme in 2029 air there would be 7 exceedances of NO_2; with the scheme there would be none [Es Ch 5 Table 5.25]. For PM_{10} the 2018 survey results and the modelled results in 2029 without or with the scheme are all below the current annual limit of 20µg/m^3. However overall, 368 of the 557 human health receptors are modelled to experience an increase in annual mean NO2 concentrations as a result of the Scheme [Es Ch 5. 5.10.24] and some receptors experience increases in PM_{10} giving a disbenefit in cost of -£1.3m. Of particular concern are St Margaret's C of E Primary School, which is only 200m from the M62, and Parrenthorn High School, which is only 300m away (and a similar distance from the M60). Both will be negatively impacted by this scheme.

NNNPS states that air quality considerations are likely to be particularly relevant where schemes are proposed within or adjacent to Air Quality Management Areas; or on roads identified as being above Limit Values [para 5.23], as in this case. Air quality considerations should be given substantial weight where, after taking into account mitigation, a project would lead to a significant air quality impact in relation to meeting environmental assessment requirements (as here); or where they lead to a deterioration in air quality in a zone/agglomeration [NNNPS 5.24].

Consent should be refused where, after taking into account mitigation, the air quality impacts resulting from the proposed scheme will either: result in a zone/agglomeration which is currently reported as being compliant with the Air Quality Standards Regulations (2010) becoming non-compliant; or affect the ability of a non-compliant area to achieve compliance within the most recent published timescales reported to the Examining Authority at the examination [NNNPS 5.25]. As the scheme would continue the non-compliance of the GM AQMA it should be refused.

5. Noise pollution would increase - There are six NIAs within 600m of the Scheme, 4 adjacent to the motorway and 2 adjacent to the local road network and together affecting 1,265 dwellings. Mitigation with quieter road surfacing and insulation may result in more people benefitting from reduction of noise than experience an increase but for 326 receptors noise would worsen for an increase of less than 1dB LA10,18h / Lnight [11.33]. However, noise pollution from construction is particularly severe, causing significant adverse impacts [Es Ch11, 11.12]. Construction would take place at night over a three and half year period, causing unacceptable noise and disturbance to local residents living on streets adjacent to the junction. This is means the DCO fails to meet the Noise Policy for England 2019 which aims to avoid, mitigate and minimise such adverse significant impacts, on health and quality of life. The scheme is therefore non-compliant with NNNPS 5.239.

6. Climate emissions would increase - The total emissions would be 201,784tCO2e (construction carbon **62,013tCO2e** [Es Ch.14, Table 14.22]; operational emissions **151,090tCO2e** [Es Ch.14 Table 14.23]). Total road user GHG emissions over 4th/5th/6th UK Carbon Budget periods are 6,003,082 tCO2e of which the scheme would contribute 96,820 tCO2e. Scheme contribution to each of these carbon budgets represents 0.0002% therefore NH concludes there would be no significant impact on achieving these budgets [Es Ch14 Table 14.24]. This is a false assertion as increasing GHG emissions will make it even harder for the UK to reach its legally binding climate targets when it is already struggling to do so.

The TDP sensitivity test is applied with no explanation of its methodology [Es Ch14, 14.10.9 & Table 14.25]. It should be ignored until the methodology is presented.

7. Impact on Green Belt – the majority of the scheme lies within the Green Belt [Figure 6.1]. 'Places for Everyone', Greater Manchester's Spatial Framework has allocated land to the north-east of the junction, JP-G10 Heywood/Pilsworth Strategic Allocation for development [Figure 6.2]; the Northern loop would lie within this allocation. The scheme is inappropriate development which is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances [NNNPS 5.203]. It would, with a new viaduct and a new bridge, impact adversely on the openness of the Green Belt, it is not local transport infrastructure and there are no very special circumstances as the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal,

is clearly outweighed by other considerations. For example, the failure to consider alternatives, the increased number of road casualties, air and noise pollution, and climate emissions. It therefore fails the very special circumstances test for development within the Green Belt.

8. No net gain in biodiversity - NH is aiming for no loss but Natural England wants an ambitious net gain in biodiversity. There will be a net gain in habitats of 3.68% and in hedgerows of 58.50% [ES Ch 8 Table 8.30]. There are a number of local nature reserves and sites of biological importance, of which 9 lie within 1km of the DCO boundary and 11 lie within 200m of the affected road network. Impacts during both construction and operation include adverse impacts on bats, otters, birds (including barn owls and bitterns), great crested newt, brown hare, and hedgehog, however none are considered significant.

9. Adverse landscape and visual impacts – Visual impacts are considered with mitigation to be slightly adverse. I do not agree. Although set within the existing motorway corridor, the widening of the motorway, the new viaduct flying over the existing junction, loss of vegetation, night lighting, headlamps and new signs/gantries would increase the prominence of the new and the existing road leading to substantial adverse impacts.

10. Poor value for money – The initial BCR is 0.86. With wider benefits of £27.84m the BCR increases to only 1.17. Managing demand for road space and investing in modal shift would give much better value for money.

Anne Robinson
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