



# Friends of Carrington Moss Written Representation

## Submission to Deadline 1 (24th September)

### Summary

As set out in our initial Representation, the Friends of Carrington Moss object to this application. We would like to add further concerns for your review.

Our Written Representation includes reference to the following topics:

- Context (which should be taken into account when assessing the project, all the findings of the Environmental Statement and the commentary in this written representation)
- The Need for the Scheme (not proven)
- Alternative Options (sustainable passenger and freight transport solutions)
- Places for Everyone (which has not been fully considered)
- Carbon Emissions (which is incomplete)
- Article 2 of the Human Rights Act (which has not been taken into account).

### Context:

The following should be taken into account when assessing the project, all the findings of the Environmental Statement and the commentary in this written representation:

- All new development should be delivered in accordance with NPPF paragraph 109 (that “*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes*”). There is a national focus on sustainable growth, including sustainable employment locations and sustainable transport, with a significantly reduced need for travel!
- Attaining significant modal shift is critical to the achievement of government targets, as recognised by the Climate Change Committee (CCC), which reported (2023)<sup>1</sup> that meeting the legally prescribed sixth national carbon budget (2033–2037) “*can only be achieved if Government, regional agencies and local authorities work seamlessly together*” Funding for transport initiatives should, therefore, support the achievement of the government’s target.
- It is clear from the recently published CCC report Progress in Reducing Emissions<sup>2</sup> that the country is not on track to achieve its commitment to reducing emissions in 2030 by 68% (compared to 1990 levels) and that urgent action is needed to ensure that this target is not seriously undermined.

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<sup>1</sup> [REDACTED]

<sup>2</sup> CCC Progress in reducing emissions 2023 Report to Parliament, [REDACTED]



- In the same report<sup>3</sup>, the CCC recommended (R2023-148) that the government “Conduct a systematic review of current and future road-building projects to assess their consistency with the Government’s environmental goals. This should ensure that decisions do not lock in unsustainable levels of traffic growth and develop conditions (which can be included in the Roads Investment Strategy 3 process and beyond) that permit schemes to be taken forward only if they meaningfully support cost-effective delivery of Net Zero and climate adaptation”.
- All 10 districts in Greater Manchester, and the GMCA have declared a climate emergency, and the region agreed its 2038 carbon neutral target in 2018.
- The Greater Manchester Strategy<sup>4</sup> states that the two most pressing priorities identified for the region are climate change and inequalities and highlights that Greater Manchester needs “to act quickly on decarbonisation”. Sustainable passenger and freight transport should, therefore, be prioritised over road schemes which generate higher levels of carbon emissions and pollution (which disproportionately affects the most vulnerable in our society).
- The Greater Manchester Strategy progress reports confirm that the region is currently well behind where it needs to be to achieve its ambition to be carbon neutral by 2038.
- The Greater Manchester Transport Strategy 2040<sup>5</sup> has a vision for 50% of trips to be made by sustainable modes by 2040. The document states (page 8) that “Achieving the Right Mix is expected to lead to zero net growth in motor vehicle traffic in Greater Manchester between 2017 and 2040”.
- Greater Manchester has signed the Integrated Covenant of Mayors which commits each signatory to limit emissions to below 80% to 95% below 1990 levels, or below two metric tons per capita, by 2050. Although not legally binding, these commitments present a clear and lasting pledge to reduce emissions in the decades to come.
- Greater Manchester’s 5-Year Environment Plan<sup>6</sup> (5YEP) highlights (page 81) and reinforced in PfE (paragraph 5.41), along with other data highlighting the importance and urgency of addressing air pollution, that “the health and social care costs of air pollution in England could reach £5.3 billion by 2035 unless action is taken.
- The 5YEP reflects (Challenge 2, page 10) that there is “strong evidence associating air pollution with increased mortality and ill health”. The document confirms that “NO<sub>2</sub> levels in Greater Manchester are in breach of legal limits”. Again, reinforced in PfE (paragraph 5.44).
- The Greater Manchester Spatial Plan (Places for Everyone, PfE)<sup>7</sup> confirms (paragraph 5.45) that “Greater Manchester has also signed up to achieve WHO ‘Breathe Life City’ status by 2030, which means achieving WHO targets for PM (PM<sub>2.5</sub> must not exceed 5 µg/m<sup>3</sup> annual mean) and other air pollutants by this date. Regardless of targets, there is no clear evidence of a safe level of exposure below which there is no risk of adverse health effects. As such, policy ambitions should always be to reduce air pollution to as low as possible as further reduction of PM or NO<sub>2</sub> concentrations below air quality targets/standards are likely to bring additional health benefits”

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<sup>3</sup> CCC Progress in reducing emissions 2023 Report to Parliament, p420

<sup>4</sup>  
<sup>5</sup>

<sup>6</sup> [https://www.greatermanchester-ca.gov.uk/media/1986/5-year-plan-branded\\_3.pdf](https://www.greatermanchester-ca.gov.uk/media/1986/5-year-plan-branded_3.pdf)

<sup>7</sup> <https://www.greatermanchester-ca.gov.uk/media/9578/places-for-everyone-joint-development-plan-document.pdf>



- Environment Act 2021<sup>8</sup> introduces two new targets relating to PM<sub>2.5</sub>
- The principles of the Green Claims Code<sup>9</sup> require that, in relation to the scheme,:
  - claims must be truthful and accurate
  - claims must be clear and unambiguous
  - claims must not omit or hide important relevant information
  - comparisons must be fair and meaningful
  - claims must consider the full life cycle of the product or service
  - claims must be substantiated

## Need for the Scheme

We do not believe the Case for the Scheme has been proven and, despite the assertion (paragraph 6.13.8) that “*electric vehicles and other non-polluting fuels will reduce tail pipe emissions from vehicles*”, there is increasing recognition that the only real way to reduce emissions is to reduce the amount of motor vehicle traffic on the roads. The funding for this scheme should, therefore, be redirected to more sustainable rail schemes, not expanding road capacity to encourage yet more vehicles to travel even more miles, at faster speeds.

Furthermore, national and regional expectations require **sustainable** economic growth, which should mean that the need for travel is reduced, a factor that should be reflected in traffic numbers, including estimates related to future capacity. This would, in turn, mean that improvements to national connectivity (1.6.1) should, indeed, be focused on enhancements to rail transport.

Scheme documents show a very marginal cost benefit (1.6.2), which is likely to be consumed by increasing costs. The benefits have also been overstated. Paragraph 5.3.12, for example, highlights the households who will be forecast to experience increased and reduced noise. Whilst there is an expectation that a larger number of households will benefit from reduced noise, this is based on assumptions that may not be realised. In addition, the costs associated with the smaller number of households that will experience increased noise levels may be greater due to a number of unknown and underestimated health conditions (including mental health episodes).

Where is the evidence that road schemes result in the improved journey time reliability set out at paragraph 5.3.13 or the productivity improvements set out at paragraph 5.3.14? Extra capacity typically results in induced traffic that renders such journey time benefits unattainable and, given that there is a focus on sustainable economic development, there is an expectation that there will be reductions in the travel to work requirements. In any event, the calculations of productivity improvements in the workplace typically do not include travel to work time. If this calculation relates only to the movement of goods and/or services, this should be explicitly stated and there would be many more benefits if such movements used sustainable transport options (rail/water), particularly for long distance journeys.

Other assumptions have been made that are unrealistically optimistic (2.1.3). The move to EVs, for example, is hampered by financial constraints (for both individuals and businesses), supply challenges and a lack of fast-charging facilities.

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<sup>8</sup> <https://uk-air.defra.gov.uk/networks/monitoring-methods?view=PM-Environment-Act-MonitoringMethods#:~:text=These%20have%20been%20set%20through,met%20across%20England%20by%202040.>

<sup>9</sup> [Making environmental claims on goods and services - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/making-environmental-claims-on-goods-and-services)



We note that some of the wording in the documents is rather misleading and would not meet the tests of the Green Claims Code. Paragraph 1.5.8, for example, which states that “*All wards impacted by the Scheme would benefit from improved health as a result of a reduction in the long term exposure to traffic noise*” is extremely misleading.

The word “significant” typically would be interpreted as “considerable”, “major”, “sizeable”, “substantial”. The suggestion that journey time savings of “*almost 2.5 minutes in 2029 and almost 3 minutes in the 2044*” (4.6.6) should be considered “significant” on a national network, which supports longer (rather than local) journeys, is absurd. The average person is unlikely to describe those time savings as significant, especially when considering the cost of the scheme and the potential benefits more sustainable initiatives could bring.

Induced traffic is calculated to result in just “*slight increases*” in journey time (4.6.8) and diversions/route changes due to construction delays are “*not forecast to be significant enough to result in substantial changes in travel time on these alternative routes*” (4.9.1). We believe this is an unreasonable assumption, especially given the likelihood of large numbers of HGVs using alternative routes which may not be appropriate for their size and weight.

The recent submission from the Transport Action Network to the Department for Transport Capital Spend Review<sup>10</sup> confirms (page 8) that “*It has been 30 years since the myth that road building is good for the economy and eases congestion was debunked*”. The submission also highlights (page 12) the Welsh Labour Government’s road building tests, which assert that “*All new roads in Wales need to contribute towards achieving modal shift – both to tackle climate change and to reduce congestion on the road network for freight*”. Should similar aims be introduced in England, this scheme would not be compliant with those tests.

In summary, despite paragraph 6.8.24 asserting that the “*most significant benefit of the Scheme is due to travel time savings*”, these are minimal and will not be maintained if additional traffic is induced into the area (1.3.4). There are no genuine benefits to the scheme, and the documents suggest that there would be increases in:

- traffic (1.4.2, 4.5.2), with vehicles travelling at faster speeds (5.3.9)
- casualties (1.4.1)
- air, noise, light, vibration and water pollution (eg 1.5.4, 3.1.11, 5.3.11)
- carbon emissions (5.3.9).

This is not a scheme that complies with national policy for sustainable growth.

Given that the scheme will not result in increased modal shift or support the aim to reduce motor vehicle traffic, and the need for the scheme is not proven, there are no exceptional or very special circumstances arising from this project to justify removing land from the Green Belt.

## Alternative Options

We cannot find any indication that sustainable alternative options have been considered. This is important because a significant number of the vehicles currently using the route are HGVs, for which national connectivity should be focused on rail and water-based transport. This scheme will just encourage the continuation of long-distance road-based haulage.

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<sup>10</sup> <https://transportactionnetwork.org.uk/wp-content/uploads/TAN-Report-iPDF.pdf>



Furthermore, diversions during construction will significantly increase air, noise, light, vibration and dust pollution on any alternative routes, causing considerable concerns, expense and health issues for residents, particularly where those alternative routes do not usually support large volumes of HGVs and other traffic.

## Places for Everyone (PfE)

Despite the statement in paragraph 6.23.4, it appears that the objectives, policies and expected overall outcomes of the Greater Manchester Spatial Plan (now known as Places for Everyone, or PfE) have not been fully taken into consideration within the assessments related to this scheme, particularly in terms of the cumulative impacts of air, noise, light, vibration and water pollution, and, of course, carbon emissions. All these issues need further scrutiny as, given that PfE has now been adopted, planning applications associated with the proposed allocations are, to all intents and purposes, guaranteed approval (see 6.22.12).

There has been a selective consideration of the Policies in PfE. Policy JP-S5 (Clean Air), for example, is extremely important in relation to transport schemes and includes the following criteria:

***“1. Locating and designing development, and focusing transport investment, so as to reduce reliance on forms of transport that generate air pollution***

***6. Implementing the Clean Air Plan and associated measures***

***11 Development should be located in areas that maximise the use of sustainable travel modes and be designed to minimise exposure to high levels of air pollution, particularly for vulnerable users”.***

The Policy is supported by Reasoned Justification that highlights (paragraph 5.40) the significant effect of air pollution on public health, that *“transport is the major source of air pollution with, with roads accounting for 65% of nitrogen oxides (NOx), 79% of larger particulates (PM10) and 31% of carbon dioxide emissions across the city region”* (5.46) and that *“Short-term high-pollution episodes can affect health as well as long-term exposure to lower levels, so it will be important to tackle both peaks and average levels of air pollution under relevant actions”* (5.51).

In addition, in choosing to focus on a road scheme, there appears to have been no consideration of PfE Strategic Objective 6, which aims to promote the sustainable movement of people, goods and information (including improving opportunities for sustainable freight). This scheme will also not support PfE Strategic Objective 7, which aims to ensure Greater Manchester is a more resilient and carbon neutral city-region (including promoting sustainable patterns of development that minimise the need to travel and contribute to cleaner air).

## Carbon Emissions

We believe the applicant is aware of the Greater Manchester 2038 Net Zero Carbon target, established in 2018 (despite the statement at paragraph 6.13.5 that they are *“not aware of any relevant non statutory targets”*).



It should be noted that the DEFRA Peat Pilot Report<sup>11</sup> (September 2020) highlights (page 6) that “Greater Manchester has set a target of net carbon neutrality by 2038. Modelling currently used by Greater Manchester Combined Authority (GMCA) suggests that 50- 75% of peatland in the city region will need to be restored in order to achieve these targets, but this modelling may significantly underestimate the role of peat in net emissions budgets”. This should be taken into consideration if the results of any geological surveys identify peat in the areas concerned.

There also does not seem to be any allowance made for the opportunity cost of lost sequestration due to land sealing, nor for the acknowledged and expected induced traffic (including HGVs).

The NPPF requires (157) that the planning system should (among other things) “*shape places in ways that contribute to radical reductions in greenhouse gas emissions*”. Investing in new roads, rather than sustainable passenger and freight transport options, does not support the achievement of that criterion.

The impact of the increased carbon emissions from the scheme has been assessed as “*not significant*” (6.3.16) but it will have a significant impact on the carbon emissions in the local area, including the achievement of GM’s 2038 target. Furthermore, if all national road schemes make this claim, at what point does the cumulative impact of all the proposed road schemes become significant in relation to the government’s target?

It should be noted that community groups in Greater Manchester did their own calculations about the carbon implications of PFE<sup>12</sup> and also referred to the approach taken in the Cambridge Local Plan<sup>13</sup>, both of which may be useful when considering the cumulative carbon implications of development in the area of the scheme.

## Article 2, Human Rights Act

We welcome the Planning Inspectors’ inclusion of Air Quality in the list of Principal Issues (Rule 6 letter) and believe that the examination should include reference to the increasing evidence of the health impact of air pollution.

We note that paragraph 6.2.1 of the Statement of Reasons mentions Articles 1, 6 and 8 of the Human Rights Act (HRA) but does not include reference to Article 2<sup>14</sup>. This Article states that “*Public authorities should also consider your right to life when making decisions that might put you in danger or that affect your life expectancy*”. For those who are already susceptible to the impact of air pollution, the increases expected as a consequence of this scheme could significantly affect their life expectancy, particularly for vulnerable children and adults, including those with relevant protected characteristics.

Data from the Air Quality Life Index<sup>15</sup>, for example, makes it clear that particulate pollution is the greatest external risk to human health. Its impact on life expectancy is comparable to that of smoking, more than 4 times that of high alcohol use, more than 5 times that of transport injuries like car crashes, and more than 6 times that of HIV/AIDS.

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<sup>11</sup> [REDACTED]

<sup>12</sup> Dr Mark Burton of Steady State Manchester led this work [REDACTED]

<sup>13</sup> Greater Cambridge Local Plan – Strategic spatial options appraisal: implications for carbon emissions; Bioregional, on behalf of Greater Cambridge Shared Planning Authority, November 2020

<sup>15</sup> [REDACTED]



The AQLI's latest data reveals that “*permanently reducing global PM<sub>2.5</sub> air pollution to meet the World Health Organization (WHO) guideline would add 1.9 years onto average human life expectancy*”.

Simister is one of the places that already experiences illegal levels of pollution and there is no evidence that approval of this scheme will comply with Article 2 of the HRA, paragraphs 109, 180 or 192 of the NPPF or the targets set out in the Environment Act 2021. In addition, whilst the Greater Manchester Clean Air Plan has been on a roller-coaster ride for several years, there is no evidence that this scheme will enable local boroughs to comply with the requirements of that Clean Air Plan when it is published.

Despite the references in the report to the identified exceedances of pollutants (paragraph 6.14.21 for example), there are expected to be no significant effects from either dust (paragraph 6.14.22) or air quality (paragraph 6.14.23). Given the anticipated increases in traffic and the associated air pollution, this assessment is, at the very least, questionable.

In considering the impact on human and wildlife health, it is shameful that the new PM<sub>2.5</sub> 2040 targets (and the interim targets) are judged not to apply to schemes such as this (paragraph 5.3.5, APP-044). The Environment Act target legislation<sup>16</sup>, however, provides for the Secretary of State to (12.3.a) “*establish new monitoring stations to measure PM<sub>2.5</sub> levels for the purposes of these Regulations*”.

Whether or not this scheme goes ahead, a request will be made for at least one such monitoring station to be secured. PM<sub>2.5</sub> levels will, therefore, need to meet the requirements of the Act. Not comprehensively measuring and monitoring air pollution in an area with such high traffic levels is a total betrayal of current and future generations and the inadequacy of the number of monitoring stations, or the differences between national and local compliance with Limit Values (paragraph 5.3.14, 5.3.15, Table 5.5), should not be used as a reason to abdicate responsibility for the health of local populations (humans or wildlife) and users of the motorway.

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<sup>16</sup> <https://www.legislation.gov.uk/ukdsi/2022/9780348242959>

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