



Friends of Carrington Moss Written Representation

Submission to Deadline 4 (10th December)

Air Pollution Impacts of the Scheme

We'd like to take this opportunity to thank the Planning Inspectors for taking the time to consider the air pollution impacts of the scheme in some detail. We do, however, remain very concerned about these impacts, on both humans and ecology.

Not only is it "*generally accepted*" that some vehicles are getting cleaner, it is widely recognised (including by the government) that, in relation to PM_{2.5}, there is "*no safe threshold below which no adverse effects would be anticipated*"¹. Alternative reporting states, "*There is no safe amount of a microscopic form of airborne pollution known as PM_{2.5}*"².

Greater Manchester's Clean Air Plan website³ quotes the Director of Public Health - "*We estimate in Greater Manchester that air pollution is the biggest environmental cause of poor health. Up to 1,200 deaths each year are contributed to by poor air quality*". The site also quotes the World Health Organisation - "*One third of deaths from stroke, lung cancer and heart disease are due to air pollution*". Yet, whilst Southwark Coroner's Court⁴ found that traffic related air pollution "*made a material contribution*" to the death of Ella Adoo-Kissi-Deborah (aged 9), the assessment related to the impact of air pollution as a direct consequence of this scheme is inadequate. It is highly unlikely that Ella Adoo-Kissi-Deborah spent "more than one hour" in a particular location, on each occasion that she was breathing in the air pollution that caused her death. To suggest that relevant exposure relates only to particular places where people would spend more than 1 hour is dangerously irresponsible!

The DEFRA PM_{2.5} Target Interim Planning Guidance⁵ clearly states that "*Applicants and Local Planning Authorities should therefore consider the impact of developments on air quality in all ambient air, whether a monitor is present or not*". Given the targets must be achieved by 2040, the advice mentions the cumulative impact of development, recognising that "*Whilst contributions from individual developments may be small, cumulatively they can lead to an increase in regional exposure, and so will have public health impacts and affect progress towards the targets*". This means that even the (unbelievably) "insignificant" impact of this scheme should be taken into consideration and that appropriate action should be taken "*to minimise emissions of PM_{2.5}*".

In summary, drawing on the evidence and the statements made at the Hearing, our concerns include:

- Given the DEFRA guidance, we do not understand why it is not necessary to monitor the current and future status of air pollution at the heart of the scheme (ie not in locations miles away) – nor why PM_{2.5s} do not need to be considered - there **are** now national targets, which have to be met by 2040
- Nor do we understand why there is no need to ensure there are no exceedances (the applicant suggested that they would normally not be doing any monitoring unless there was a need to ensure there were no exceedances – 23:25)

¹ <https://laqm.defra.gov.uk/faqs/faq141/>

²

⁵ <https://uk-air.defra.gov.uk/pm25targets/planning>



- The excuses given for not using Diffusion tubes (they are apparently labour-intensive) or automated monitoring stations (they are considered to be expensive, despite the overall cost of the scheme) and the other excuses given for not monitoring (it would be too much work to analyse the outcome of any air pollution statistics because there are so many factors to take into account to determine whether air pollution increases are as a direct result of the implementation of the scheme, for example) – air pollution is a killer, we do not want or need excuses, we want appropriate monitoring to be put in place in advance of this scheme being approved so there is a clear understanding of the current and future impact on the health of people and ecology
- The evidence does not relate to the air pollution in the direct vicinity of the scheme - whilst attendees insisted that air quality in Greater Manchester is improving, it is clear that there are still issues related to the strategic road network⁶, with exceedances recorded “*around the ring road*” (M60). We strongly believe that, if the baselining and the monitoring were to be recorded on the site of the scheme (rather than elsewhere), it would not only demonstrate that this issue was being taken seriously but would also provide a more accurate picture of the current status of air pollution and the potential future impact of the scheme.

It is not credible that:

- there will be reduced congestion and air pollution, despite considerable increases in traffic, including additional HGVs and other motor vehicles caused by the huge levels of development proposed in Places for Everyone
- when traffic is diverted onto local roads (during the construction period), it will not cause significantly increased air pollution on those roads (given the current traffic numbers are circa 90,000 vehicles per day, including HGVs)
- there are no significant implications for air pollution because of this scheme
- there is no need to monitor air pollution levels at the site of the scheme during construction and/or operation
- the cumulative impact of this scheme on local and regional air pollution will not be significant
- traffic data is an appropriate proxy for air pollution data (HGVs are not yet “getting cleaner”).

We look forward to assessing the updated information that will become available in the coming weeks.

[REDACTED]