



**Friends of
the Earth
Manchester**

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Planning application references:

Stockport Metropolitan Borough Council: DC/053678
Manchester City Council: 104094/FO/2013/S2
Cheshire East Council: 13/4355M

4th December 2013

re: A6 to Manchester Airport Relief Road Planning Applications

Dear Sir/Madam

Please see below for Manchester Friends of the Earth's response to the A6 to Manchester Airport Relief Road (A6 – MARR) planning application.¹

Manchester Friends of the Earth does not support the proposed A6-MARR scheme as we do not believe that the case has been made for the economic, environmental and transport benefits claims put forward in the business case and planning application.

We also believe that the proposed scheme will have a wide range of detrimental environmental, economic and social impacts that contradict both Greater Manchester and national objectives and legal obligations.

Our response is arranged in six key sections, namely:

- 1) Scope of proposed scheme – review of other non-road building options,
- 2) Air quality / Air pollution,
- 3) Increased Traffic levels,
- 4) Climate change legislation,
- 5) Accuracy of Traffic modelling and
- 6) Major Scheme Business Case.

Introducing the 2013 edition of the Transport and Environment Reporting Mechanism, Hans Bruyninckx, the European Environment Agency Executive Director, said: "Many cities are applying innovative ideas which will make the car-based transport system seem like an idea belonging to the last century. City life does not have to mean polluted air, congestion, noise and long travelling times. New ideas in urban transport are transforming many cities into more pleasant, healthy places to live."²

Manchester Friends of the Earth is disappointed that instead of focussing on innovative 21st Century urban transport solutions, Greater Manchester is seeking to build new roads. We will campaign for the proposed investment to be used to support public transport and active travel schemes. Transport for Greater Manchester and Department for Transport figures show that such schemes achieve far greater cost-benefit ratios.

In 2013, Greater Manchester developed the 12 year Velocity (Cycling City Ambition Grant) vision – but has yet to allocate the funding to realise this vision. The £300 million earmarked for the 6 miles of A6-MARR road would enable Greater Manchester to meet the All Party Parliamentary Cycling Group (APPCG) funding target of £10 per person³ per year across the whole of Greater Manchester for 12 years – funding such a scheme would help deliver truly innovative and transformative transport solutions.

Manchester Friends of the Earth believe that Stockport Council, Manchester City Council and Cheshire East Council have a legal obligation under European and UK air quality and climate change legislation to refuse planning permission for the proposed A6-MARR road scheme.

Yours sincerely

Pete Abel, Manchester Friends of the Earth co-ordinator
Dr Graeme Sherriff, Manchester Friends of the Earth Transport campaign co-ordinator

1) Scope of the proposed scheme – review of other non-road building options.

Since the original SEMMMS study, which was completed in 2001, there has been no full up-to-date review of the need for the A6-MARR in comparison to other non-road building options to address traffic congestion problems. This is despite a national flattening out in traffic growth⁴, changes to travel patterns and new legislation on air quality and climate change. The A6-MARR would be close to other major infrastructure schemes which would affect traffic levels and air quality and carbon emissions, including Manchester Airport City Enterprise Zone, plans for Woodford Garden Village on land at the former Woodford Aerodrome site south of the A6-MARR,⁵ and plans for a major new settlement east of Handforth at the junction of the A555 and the A34.⁶

Manchester Friends of the Earth believe that it is unacceptable that alternative options including a public transport improvement and cycling and pedestrian infrastructure only option, without the A6MARR, have not been considered.

The A6-MARR scheme has been considered in isolation from other linked planned major infrastructure schemes and therefore cumulative emissions have not been forecast. In particular, the lack of up to date traffic generation forecasts for the expansion of the Manchester Airport City Enterprise Zone, which is central to the strategic economic case made for the A6-MARR, does not allow a true climate change impact assessment to be carried out.

Notwithstanding the flaws in traffic modelling and the consideration of the scheme in isolation from other linked major infrastructure which would be likely to give rise to higher greenhouse gas emissions than forecast, taken at face value the scheme's claims to have a negligible change in overall emissions show that the scheme will therefore make no contribution towards the three councils' core objectives for 'lower carbon emissions' (Business Case para 3.12 and Tables 3.2 to 3.4) and the commitment to reduce carbon emissions in line with UK Government targets, as set out in Greater Manchester LTP3.

We would question why significant sums of public money should be spent on a scheme which will make, at best, no contribution towards lowering carbon emissions and in fact lead to an increase.

Alternative non-road options to address congestion problems, which could also make greater contributions towards meeting carbon reduction and air quality targets, have not been considered and appraised. This is despite new legislation on climate change and air quality having come into force, and new evidence (IPCC 2013) on the scale and urgency to tackle the problems, since the SEMMMS process started.

When considering overall economic benefits of transport infrastructure schemes, there is clear evidence that cycling infrastructure schemes in particular provide some of the highest returns on investment when considering overall economic benefits.

The Business Case states that the pedestrian and cycle route adjacent to the new road will support 'the step-change in provision of infrastructure for non-motorised modes required to encourage more people to choose cycling and walking as an alternative to the car' (para 2.19) yet there is little evidence presented for these claims, nor is the option of a new path and cycleway without the road presented and appraised. Furthermore, the cost benefit analysis indicates a public transport disbenefit, due to modal shift from bus to car.

In 2013, Greater Manchester developed the 12 year Velocity (Cycling City Ambition Grant) vision – but has yet to allocate the funding to realise this vision. The £300 million earmarked for the 6 miles of A6-MARR road would enable Greater Manchester to meet the All Party Parliamentary Cycling Group (APPCG) funding target of £10 per person per year across the whole of Greater Manchester for 12 years – this would help deliver truly innovative and transformative transport solutions.

2) Air quality / Air pollution

Manchester Friends of the Earth believe that Stockport Council, Manchester City Council and Cheshire East Council have a legal obligation under European and UK air quality legislation to refuse planning permission for the proposed A6-MARR road scheme.

Air pollution is a 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. Road transport is a major source of air pollution in cities, leading to a high proportion of the population being exposed to pollutant levels above EU and World Health Organisation standards.⁷ It is estimated to be responsible for £5 - £11 billion per annum of the wider costs of transport in urban areas.⁸

2013 was declared as the 'Year of Air' by the European Commission, with new proposals on improving air quality being developed across Europe. The EC describe a dramatic rise in traffic on roads as one of the key contributors to air pollution, which is cited as the main cause of lung conditions such as asthma, with twice as many sufferers today compared to 30 years ago, and as the cause of over 350,000 premature deaths in the European Union every year.⁹ Children are particularly at risk, with epidemiological studies for the World Health Organisation showing that symptoms of bronchitis in asthmatic children increase in association with long-term exposure to NO₂.¹⁰

In October 2013, the World Health Organisation's specialised cancer agency classed outdoor Air Pollution as carcinogenic to humans in relation to lung cancer, and is classified as Group 1, signifying there is 'sufficient evidence' of a 'causal relationship'.¹¹

Legal standards for ambient air quality are set out in the 2008 Ambient Air Quality Directive, EC Directive 2008/50/EC which prescribes limits for a number of concentrations of pollutants that affect public health, including particulate matter (PM₁₀ and PM_{2.5}) and nitrogen dioxide (NO₂). The 2008 Directive was transposed into English law through the Air Quality Standards Regulations 2010 and the Government's National Air Quality Strategy. The National Planning Policy Framework (NPPF) also states in relation to Air Quality that the Planning system should contribute to and enhance the natural and local environment by:

“preventing both new and existing development from contributing to or being put at unacceptable risk from, of being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability”. (Para 109)

Under the Environment Act 1995 Part 4, local authorities are also required to review air quality in their area and introduce Air Quality Management Areas (AQMAs) in locations where air quality objectives are not met and to set out measures to reduce concentrations of air pollutants. An Air Quality Management Area (AQMA) has been declared for Greater Manchester, parts of which overlap with the A6-MARR scheme.¹² Twelve AQMAs have been declared in Cheshire East including in Disley, to the south-east of the A6-MARR scheme.

In a recent Supreme Court ruling, the Government was found to be in breach of article 13 of the EU Air Quality Directive for failing to meet the EU Air Quality Directive obligations.¹³ Under the EU's Air Quality Directive, the Government should be forced to provide the European Commission with plans for reducing nitrogen dioxide levels by 1 January 2015 in 17 regions of the UK.

The Greater Manchester Local Transport Plan 3 (LTP3) acknowledges that the European Union requirements to meet NO₂ concentration targets by 2010 have not been met, but does not set out how transport planning decisions will enable the 2015 deadline to be attained.¹⁴ Despite the focus on meeting EU limits on NO₂, the Greater Manchester Air Quality Strategy and Action Plan 'made very little difference' (LTP3 section 9.3) to NO₂ concentration at most road side locations.¹⁵ The LTP3 also acknowledges that 'financial penalties may have a significant impact on future budgets'. Greater Manchester is not due to meet legal NO₂ limits until 2020, which puts the UK, and in turn Greater Manchester authorities, at risk of large fines up to £300 million.¹⁶

The 2011 UK Air Pollution report also shows that the Manchester South air quality monitoring station, on Styal Road near the western end of the A6-MARR scheme, recorded four days of exceedances for ozone concentrations.¹⁷ Ozone is a harmful air pollutant and potent greenhouse gas, which can be transported large distances by weather.

The Greater Manchester LTP 3 also states that a detailed assessment and air quality modeling is being carried out by the Greater Manchester Transportation Unit through the Greater Manchester Emissions Dispersion project to provide a forecast for emissions for 2015/16. The Environmental Statement¹⁸ does not appear to make any reference to this assessment although it does make reference to making use of:

"calculation of predicted concentrations of NO₂ and PM₁₀ for the Do-Minimum (DM) and Do-Something (DS) scenarios for identified receptors in the opening year using ADMS-Roads, a dispersion modelling programme." (8.3.2)

Which is described as a "comprehensive tool for investigating air pollution problems due to small networks of roads that may be in combination with industrial sites, for instance small towns or rural road networks."¹⁹

2.1) Air quality in the Disley area.

The Environmental Statement acknowledges that the proposed scheme will increase air pollution levels in several areas, notably in Disley.

“Figures for PM₁₀ indicate some 61% of all receptors will be subject to a reduction in annual mean concentrations as a result of the implementation of the proposed scheme and that **some 17% will be subject to an increase.**” (8.5.8) (Emphasis added).

Table 8-12 in the Environmental Statement shows annual exceedances for NO₂ of >40 µg m⁻³ within AQMAs. The A6-MARR scheme is **predicted to increase the number of annual exceedances in Disley**, from 85 in the Do Minimum scenario to 88 in the Do Something.

EU air quality legislation is clear that limits must be met everywhere in an air quality management zone, and air quality cannot be worsened where pollution is already over EU legal limits, as is the case with the Greater Manchester AQMA and Cheshire East’s AQMA at Disley. Any new development granted in an area with pollution levels already breaching limits, that would worsen air quality, would leave the UK at risk of large financial penalties.

It is also important to note the limits of the traffic forecasting, which does not consider induced traffic. Induced traffic occurs when a greater volume of traffic is generated as a result of extra road capacity, and evidence of this has been well documented.²⁰ If induced traffic is not fully included in the assessment of the scheme, then the traffic and resultant air pollution and carbon emissions will be underestimated and hence inaccurate.

2.2) Air quality and health issues in the Wythenshawe / South Manchester area.

The Environmental Statement also reports that traffic levels will increase in several areas, notably Wythenshawe.

“In the Wythenshawe area traffic levels are predicted to increase along Portway and residential streets south of Simonsway. Local traffic management measures will be introduced on select residential routes to discourage strategic traffic routeing through the Wythenshawe area, whilst retaining local accessibility to Manchester Airport for Wythenshawe residents.” (Environmental Statement, 5.12.7)

This projected traffic increase is also recognised in the Transport Assessment:

“It is recognised, however, that some local areas will experience some increase in traffic following completion of the A6MARR scheme, **notably: Wythenshawe (south of Simonsway) to the north of the A6MARR**”²¹ (Transport Assessment, 54) (Emphasis added).

The Environmental Statement also reports that specific areas in Wythenshawe will see an increase in noise levels due to the increase in traffic flows as a result of the Airport City developments.

“Without the proposed scheme the majority of the receptors are predicted to experience a negligible increase in noise level due to traffic growth over the 15 year period. The more significant increases are predicted to occur at Hilary Rd, Wythenshawe and are **due to the increase in traffic flows in this area predicted to result from the committed developments at Airport City.**” (Emphasis added) (Environmental Statement, 13.5.11)

The Environmental Statement makes no reference to PM_{2.5} but these finer pollution particles typically make up around half of PM₁₀ emissions and two-thirds of ambient PM₁₀ concentrations. Additional PM_{2.5} is formed in the atmosphere mainly from the interaction of sulphates, NO_x and ammonia.

“There is a stronger link between these finer particles and observed ill health effects than for PM₁₀. New air quality objectives for PM_{2.5} are being introduced and will need to be met between 2010 and 2020.”²² (Emphasis added).

The Committee on the Medical Effects of Air Pollutants (COMEAP) opinion that mortality burden estimates could be calculated at the Local Authority level informed the Department of Health’s decision to include the mortality effect associated with particulate air pollution as an indicator in its Public Health Outcomes Framework for England. The indicator reflects mortality associated with particulate air pollution (as PM_{2.5}) in all upper tier Local Authorities in England.²³

The Public Health Outcomes Framework fraction of mortality attributable to particulate air pollution (PM_{2.5}) for Manchester is 5.42%.²⁴ South Manchester has All-Age All Cause Mortality (AAACM) rates of 725 per 100,000 population.²⁵ The South Manchester population is growing and is estimated to be approximately 166,000.²⁶

Using these figures would indicate that the number of deaths attributable to particulate air pollution in South Manchester is 65 each year.

The Environmental Statement and Transport Assessment acknowledge that the A6-MARR will result in increased traffic levels in South Manchester (and other areas) as well as increased air pollution.

It is recognised that South Manchester and Wythenshawe have higher All-Age All Cause Mortality (AAACM) rates than Manchester as a whole.

“In South Manchester and Wythenshawe there is significant variation between wards for all age all cause mortality (AAACM). Chorlton Park, Old Moat Northenden, Baguley and Sharston have relatively high rates when compared to Manchester as a whole.”²⁷

Increasing traffic levels in these specific areas will lead to higher air pollution levels and subsequently higher All-Age All Cause Mortality figures, or to put it more bluntly – increased numbers of unnecessary and preventable deaths.

This is clearly contrary to the UK obligations under the European Directive 2008/50/EC on ambient air quality and cleaner air for Europe.

It is also specifically recognised that South Manchester and Wythenshawe have higher cancer rates than Manchester as a whole.

“The mortality rate for all cancers for people under 75yrs in South Manchester is on the whole above the average rate for Manchester (153.5 per 100,000), Didsbury East and Didsbury West are the only two wards below the average. The data for cancer mortality rates in Wythenshawe shows that 3 of the 5 wards exceed the city average; Northenden (177.7 per 100,000), Sharston (168.9 per 100,000) and Baguley (154.9 per 100,000).”²⁸

Increasing air pollution levels in the Wythenshawe / South Manchester area will raise the risk of more residents, employees and visitors developing cancer as a result of this increased pollution.

2.3) Air quality impact recognised as a reason to refuse road schemes.

Manchester Friends of the Earth is not alone in seeing air quality concerns as a reason to reject plans for road building and widening. It should be noted that the Highways Agency recently ruled out hard shoulder running between junctions 8 and 18 of the M60, covered by the Greater Manchester AQMA, because of the detrimental impact it would have on air quality. In a precedent-setting decision, the Agency’s environmental assessment concluded that allowing more cars to use the road between Sale and Swinton would breach UK and EU standards protecting public health and the natural environment.

In their consultation report, the Highways Agency stated that:

“We looked extensively at the option to provide all-lane running on the M60 section between junctions 8 and 18. However, our environmental assessment concluded that creating this improvement would result in an increase in traffic using the motorway which would then have a detrimental affect [sic] on air quality. Poor air quality is a concern for the UK and across much of Europe, despite air being cleaner now than at any time since the industrial revolution.”²⁹

and that:

“The EIA has demonstrated that implementation of the proposed development is expected to result in a **small increase in regional emissions associated with increased vehicular use** of the road network.” (7.2.14) (emphasis added)

The Highways Agency concluded that:

“There are UK and European standards designed to protect human health and sensitive ecological habitats which we cannot ignore; as a result we are unable to take this proposal of making the hard shoulder available to traffic on this section

at this time. We are committed to delivering solutions to minimise the air quality impacts resulting from traffic using our network and are working to develop further solutions that will help improve this section of our network that comply with statutory air quality limits.” (emphasis added)

3) Increased Traffic levels.

The A6-MARR scheme does little to reduce AM and PM peak congestion – in fact the scheme makes peak congestion worse and has major increases in some specific area – which raise serious concerns in relation to air pollution.

The Transport Assessment for the proposed A6-MARR scheme recognises that it will result in increased traffic levels in specific areas::

“some local areas will experience some increase in traffic following completion of the A6MARR scheme, notably: Wythenshawe (south of Simonsway) to the north of the A6MARR; and; Handforth, High Lane and Disley to the south of the A6MARR; (Transport assessment, 54)

and that traffic will increase in the following areas:

“In terms, of the traffic using local primary routes and the strategic road network, completion of **the A6MARR scheme will increase traffic using:**
A6 between through High Lane and Disley;
A34 between the A555 and Dean Row Road;
A555 between the B5358 (at Handforth) and A5102 (at Woodford/ Bramhall), the existing completed section of MAELR; and
M56 between junctions 5 and 7. (Transport assessment, 56) (Emphasis added).

The Transport Assessment also notes that:

“The A6MARR scheme will significantly enhance vehicular access to Manchester Airport from the A6 corridor but will also open up opportunities for new or re-routed bus services to improve airport accessibility. **Access to Manchester Airport is still dominated by the car with 61% of passengers being picked-up and dropped-off by private car or taxis.** By contrast, only 10% of passengers (and 15% of staff) use public transport.” (5.15) Transport Assessment (Emphasis added).

For the Disley area, the Transport Assessment notes that:

“A6 through High Lane and Disley: The traffic modelling predicts significant increase in traffic flow on the A6 through High Lane and Disley of between 25 to 30% with the A6MARR in place. This increase is a result of both background traffic growth and the reassignment of longer distance traffic as a result of the introduction of the A6MARR. There is also the potential risk of increased traffic flows on Windlehurst Road.” (Transport Assessment, 60) (Emphasis added).

Although, it is claimed that 'enhanced mitigation' measures will reduce this increase.

“Traffic modelling of the A6MARR scheme previously predicted an increase in traffic of up to 30% on the A6 through High Land and Disley. The **introduction of enhanced mitigation measures markedly reduces this increased traffic flow to between 11 to 16%.**” (Transport Assessment, 60) (Emphasis added).

Table 9.1 in the Transport Assessment summarises the overall highway network performance statistics with and without the A6-MARR scheme.

It indicates that for both the AM and PM peak and additional 523 and 454 additional PCUs (Vehicles measured as equivalent passenger car units where, for example, one heavy goods vehicle equate to two PCUs) will be added (loaded) onto the road network.

This is equivalent to adding an extra 0.3% to the traffic levels. Table 9.1 also indicates that the AM and PM Peak 'average network speed' will show a small increase of 1kph and 0.9kph respectively.

Overall, the Transport Assessment recognises that:

“The appraisal of the recommended strategy showed that in 2021, there would be a small increase in car traffic in the morning peak compared to the Do Minimum but a small decrease in the offpeak period”. (Transport Assessment, 4.17)

Therefore the A6-MARR scheme does little to reduce AM and PM peak congestion – in fact the scheme makes peak congestion worse and has major increases in some specific area – which raise serious concerns in relation to air pollution. (See section 2)

4) Climate Change legislation.

Notwithstanding the flaws in traffic modeling and likely higher greenhouse gas emissions, taken at face value the proposed scheme’s claims to have a negligible change in overall emissions show that the scheme will therefore make no contribution towards the three councils’ core objectives for ‘lower carbon emissions’ (Business Case para 3.12 and Tables 3.2 to 3.4) nor the commitment to reduce carbon emissions in line with UK Government targets, as set out in Greater Manchester LTP3.

The Climate Change Act 2008 introduced a legally binding reduction target which requires the UK to reduce its emissions by at least 80% by 2050 against 1990 levels and a reduction of at least 34% by 2020.³⁰ The Government has set out plans for achieving the emissions reductions committed to in the first four carbon budgets up to 2027 in ‘The Carbon Plan’ published in December 2011.³¹ Emissions for the transport sub-sector, which accounts for 24% of overall UK emissions, are dominated by the car: 58% car, vans 12%, Heavy Goods Vehicles 17%. The Plan requires that sustainable travel choices are a key element of any developments to de-carbonise travel.

The latest Intergovernmental Panel on Climate Change Fifth Assessment Report was published in September 2013.³² It confirmed that warming of the climate was unequivocal and that it is extremely likely that human influence is the dominant cause of the observed warming.

Its Headline Statements from the Summary for Policymakers included that:

“Warming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia. The atmosphere and ocean have warmed, the amounts of snow and ice have diminished, sea level has risen, and the concentrations of greenhouse gases have increased. Human influence on the climate system is clear. This is evident from the increasing greenhouse gas concentrations in the atmosphere, positive radiative forcing, observed warming, and understanding of the climate system. Continued emissions of greenhouse gases will cause further warming and changes in all components of the climate system. Limiting climate change will require substantial and sustained reductions of greenhouse gas emissions.”³³

At the NW regional level, the North West Climate Action Plan outlines a vision for a low carbon region by 2020.³⁴ The action plan outlines how by 2020 public transport and car sharing are the mode of choice for many journeys and walking and cycling will be preferred for short journeys. As a result of this approach, **which clearly excludes road-building**, the action plan says that road congestion and health will be improved.

At the Greater Manchester level, the GM Climate Strategy outlines a plan to build a low carbon economy by 2020 and reduce collective carbon emissions by 48%.³⁵

Cheshire East Council has produced a Carbon Management Plan which sets out how it will reduce emissions from its own operations.³⁶ Tackling climate change is a priority of the council’s Corporate Plan 2010-2013³⁷ and a key aim of the Sustainable Community Strategy, “Ambition for All”.³⁸

The Major Scheme Business Case (MSBC) states that other measures which would have a positive impact on carbon reduction – such as new bus services and modal shift to cycling – **have not been included** in the modeling. It would inform appraisal of the contribution of the scheme to carbon reduction objectives if it were possible to compare this with the greenhouse gas impacts of a public transport improvement and cycling and pedestrian infrastructure only option, without the A6-MARR.

Table 4.3 Appraisal of impacts showed that the scheme will lead to a projected increase in carbon emissions over a 60 year period of approximately 10,300 tonnes. The scheme has been appraised to have a ‘neutral’ impact on climate change emissions. However, in the context of the UK’s legal commitment to reduce greenhouse gases by at least 80% by 2050, an actual increase in carbon emissions is a very negative outcome in terms of climate change impacts.

Notwithstanding the flaws in traffic modeling and likely higher greenhouse gas emissions, taken at face value the proposed scheme's claims to have a negligible change in overall emissions show that the scheme will therefore make no contribution towards the three councils' core objectives for 'lower carbon emissions' (Business Case para 3.12 and Tables 3.2 to 3.4) nor the commitment to reduce carbon emissions in line with UK Government targets, as set out in Greater Manchester LTP3. This obviously raises the question of why such significant sums of public money should be spent on a scheme which will make, at best, no contribution towards lowering carbon emissions.

5) Accuracy of Traffic modeling

Recent traffic trends and the inaccuracy of – and over-reliance on – future forecasts of traffic show that the case for building the A6 – MARR is unfounded.

The latest Department for Transport (DfT) traffic statistics show that the amount of traffic is now below the level seen in 2003. (259 billion vehicle miles per year compared to 260 billion vehicle miles per year ten years ago).

The case for the A6-MARR road – particularly the cost benefit claims – rely heavily on future growth in traffic. However, there is clear evidence that the methods and assumptions underlying the National Transport Model (NTM) - used by the DfT to project road traffic levels – need to be re-examined and revised in order to make the models and forecasts more accurate.

The supporting documentation available during the January 2013 consultation did not seem to provide an analysis against identified objectives and problems, as required in the Webtag methodology. Walking or cycling is not included in the modeling, which conceals the real impact of locating the new development in the planned locations and accessing them primarily by road.

The public transport forecasts do not appear to be robustly validated and thus mode choice and the impacts of the scheme are not well represented.

In particular the mode split predicted by the model for areas where it is currently measured, such as central Manchester and surrounding areas including Stockport, is not shown for the modelled base year or future years.

Some of the Department for Transport (DfT) guidance does not appear to have been followed, for example there were no options report nor an analysis of time costs and savings by size.

It is also important to note the limits of the traffic forecasting, which does not consider induced traffic. Induced traffic occurs when a greater volume of traffic is generated as a result of extra road capacity, and evidence of this has been well documented.^{39 40}

The 1994 report by the Standing Advisory Committee on Trunk Road Assessment, entitled "Trunk Roads and the Generation of Traffic" stated that:

“Considering all these sources of evidence, we conclude that induced traffic can and does occur, probably, quite extensively, though its size and significance is likely to vary widely in different circumstances. (Conclusion 10)”

and that:

“These studies demonstrate convincingly that the economic value of a scheme can be overestimated by the omission of even a small amount of induced traffic. We consider that this matter is of profound importance to the value for money assessment of the Road Programme.” (Conclusion 12)

and:

“We therefore recommend that scheme appraisal must be carried out within the context of economic and environmental appraisals at the strategic area-wide level which take account of induced traffic through variable demand methods. Much more emphasis needs to be placed on the strategic assessment of trunk routes within a corridor or regional or urban context. (Conclusion 17) ⁴¹

If induced traffic is not fully included in the assessment of the scheme, the traffic and resultant air pollution and carbon emissions will be underestimated which further undermine that projections included in the A6-MARR supporting documentation.

6) Major Scheme Business Case (MSBC)

The Economic Assessment Report (EAR, MSBC Appendix B6) provided during the January 2013 consultation did not provide a sound strategic case for the A6-MARR proposal. Taken at face value, it illustrates that neither the “with scheme” nor the “do nothing” scenarios will prevent the worsening congestion in the study area. Manchester Friends of the Earth would therefore argue that this totally undermines the implied EAR claim that the scheme will generate an economic benefit compared with the present situation, and casts severe doubts on the estimates of GDP and productivity growth that depend on time-savings.

Additionally, the low discount rate, combined with assumptions about income growth, means that only about 30% of the estimated benefit are projected to accrue in the first 30 years. The overwhelming bulk of the benefit arises so far in the future as to be of little use.

Conclusion

Manchester Friends of the Earth believe that Stockport Council, Manchester City Council and Cheshire East Council have a legal obligation under European and UK air quality and climate change legislation to refuse planning permission for the proposed A6-MARR road scheme.

Manchester Friends of the Earth
4th December 2013

Endnotes

- 1 <http://a6marr.stockport.gov.uk/planningapplications/?view=Standard>
- 2 http://www.eea.europa.eu/media/newsreleases/front-running-cities-changing-transport?utm_campaign=front-running-cities-changing-transport&utm_medium=email&utm_source=EEASubscriptions
- 3 <http://allpartycycling.files.wordpress.com/2013/04/get-britain-cycling1.pdf>
- 4 Department for Transport road traffic statistics 2012, table TRA5102
<https://www.gov.uk/government/organisations/department-for-transport/series/road-traffic-statistics>
- 5 <http://www.stockport.gov.uk/services/business/regendevelopment/regeneration/tcandmajordev/woodfordaerodromesite/woodfordsitedocs>
- 6 http://cheshireeast-consult.limehouse.co.uk/portal/planning/cs/town_strategies/handforth
- 7 <http://www.eea.europa.eu/media/newsreleases/air-pollution-still-causing-harm>
- 8 Air pollution: Action in a Changing Climate, 2010, Defra
<http://www.defra.gov.uk/publications/2011/04/13/pb13378-air-pollution/>
- 9 http://ec.europa.eu/research/infocentre/article_en.cfm?id=/research/headlines/news/article_13_01_16_en.html&item=Infocentre&artid=28973
- 10 <http://www.who.int/mediacentre/factsheets/fs313/en/index.html>
- 11 http://www.iarc.fr/en/media-centre/iarcnews/pdf/pr221_E.pdf
- 12 <http://www.greatairmanchester.org.uk/default.aspx>
- 13 http://www.supremecourt.gov.uk/decided-cases/docs/UKSC_2012_0179_Judgment.pdf
- 14 www.tfgm.com/journey_planning/LTP3/Documents/Greater_Manchester_Local_Transport_Plan_Core_Strategy.pdf
- 15 http://www.tfgm.com/journey_planning/LTP3/Documents/Air-Quality-Strategy-and-Action-Plan.pdf
- 16 <http://www.guardian.co.uk/environment/2010/jun/03/uk-warning-london-air-quality>
- 17 http://uk-air.defra.gov.uk/library/annualreport/air_pollution_uk_2011_issue_2.pdf
- 18 <http://a6marr.stockport.gov.uk/planningapplications/03environmentalstatement/>
- 19 See <http://www.cerc.co.uk/environmental-software/ADMS-Roads-model.html>
- 20 Goodwin, P. Empirical evidence on induced traffic; Transportation Vol 23 Issue 1 1996; SACTRA report 1994, 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>
- 21 5088198/A6MARR_TA_Main_Text_Final.docx. (Page 12)
- 22 http://www.environment-agency.gov.uk/static/documents/Research/Air_FINAL.pdf

-
- 23 <http://www.comeap.org.uk/documents/statements/39-page/linking/46-mortality-burden-of-particulate-air-pollution>
- 24 See 3.1 Fraction of mortality attributable to particulate air pollution.
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