



Manchester Friends of the Earth
Green Fish Resource Centre
46-50 Oldham Street
Manchester
M4 1LE

Planning application reference: 124181/VO/2019

5th August 2019

Re: Creation of a 440 space public car park and contractor's compound together with the installation of a 2.4 m site hoarding for a temporary period of 5 years

Dear Manchester City Council planning department,

Please see below for the Manchester Friends of the Earth response to the planning application for the use of Central Retail Park, Great Ancoats Street as a temporary car park.

Our response is arranged in four key sections, namely that the planning application:

- 1) fails to meet key Transport Policy objectives in the Manchester Core Strategy.
- 2) will increase the number of car parking spaces which will encourage more people to travel by car to this area of the City Centre contrary to Manchester City Council sustainable transport policies.
- 3) is likely to increase private car traffic which would contribute to increased air pollution
- 4) is contrary to the actions required to radically reduce climate change emissions from the transport sector.

Manchester Friends of the Earth believe that this planning application is contrary to the stated Manchester City Council transport, environmental, Core Strategy and climate policies.

We would therefore request that the Planning & Highways Committee members should exercise their powers and refuse this planning application.

We thank you for your attention on this matter.

Yours sincerely

Pete Abel, Manchester Friends of the Earth sustainable transport campaigner
Ali Abbas and Catherine Thomson, Manchester Friends of the Earth co-ordinators

Manchester Friends of the Earth believe that this planning application is contrary to the following stated Manchester City Council policies.

1) fails to meet key Transport Policy objectives in the Manchester Core Strategy.

The Transport Policy T 1 – Sustainable Transport in the Manchester Core Strategy has 9 key objectives. Manchester Friends of the Earth believes that this planning application **fails to meet** at least 5 of these objectives within Policy T 1 which aims to:

“deliver a sustainable, high quality, integrated transport system to **encourage modal shift away from car travel** to public transport, cycling and walking, to support the needs of residents and businesses and to prepare for carbon free modes of transport.”

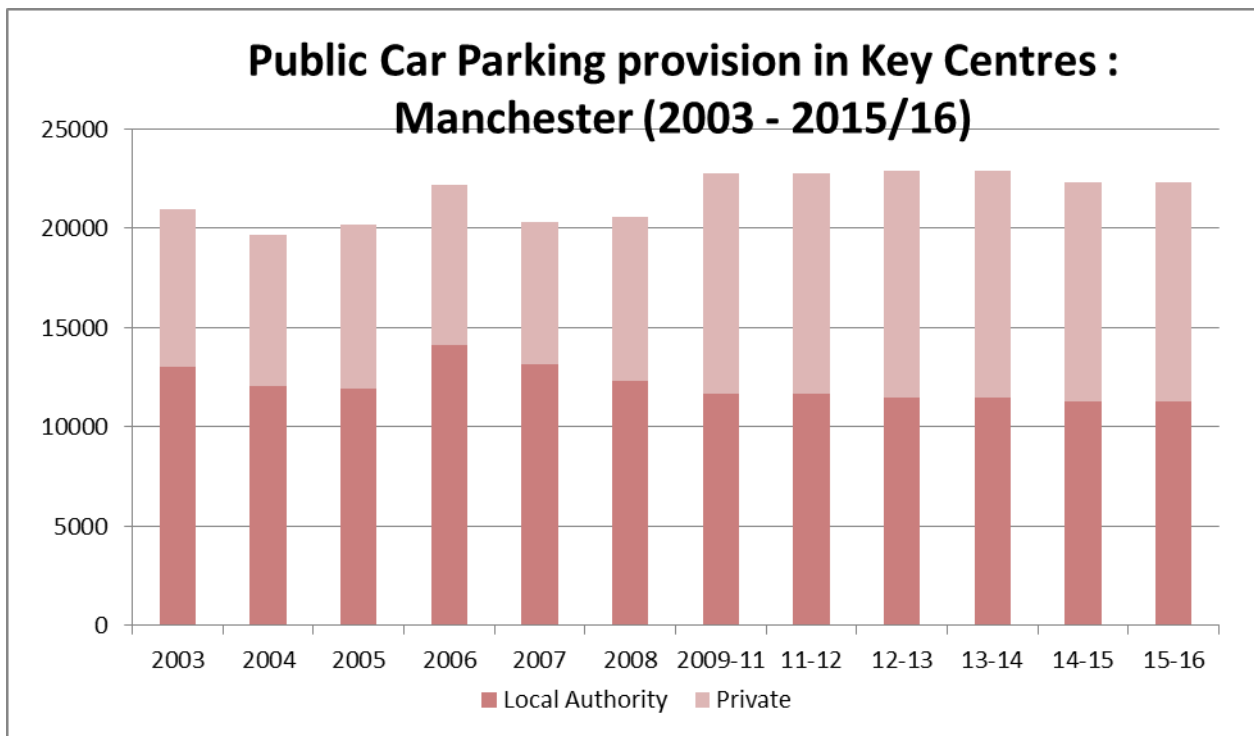
Policy T 1 states that the Council will support proposals that: -

- Improve choice by **developing alternatives to the car.**
- Promote regeneration and economic vitality **by relieving traffic congestion** and improving access to jobs and services, **particularly for those most in need and for those without a car.**
- Improve pedestrian routes and the pedestrian environment.
- Would reduce the negative impacts of road traffic, for example, **congestion, air pollution** and road accident casualties.
- Take account of the needs of road users according to a broad hierarchy consisting of, in order of priority:
 - 1. pedestrian and disabled people**
 - 2. cyclists, public transport,**
 3. commercial access,
 4. general off peak traffic,
 5. general peak time traffic. (Emphasis added).¹

Developments that facilitate and encourage more private car journeys, particularly single occupancy journeys, to the City Centre **will fail to meet these policy objectives and should be refused.**

2) will increase the number of car parking spaces which will encourage more people to travel by car to this area of the City Centre contrary to Manchester City Council sustainable transport policies.

The graph below indicates that the level of public car parking provision in the Manchester Key Centre has increased since 2003. This data does not take into account the amount of car parking provision that has been included within commercial office or business developments. For example, the 1200 space car park permitted as part of the Oxford Road (ex BBC site) development.



Data from Highways Forecasting and Analytical Services (HFAS) previously GMTU.²

Permitting developments that encourage more private car journeys will not help Manchester meet its Core Strategy objective to increase the percentage of journeys made to the City Centre (by means) other than private car::

“Delivery Strategy: Percentage of journeys made to the City Centre other than by private car Target: 67.5% by 2011 (this is a Council target that will be kept under review).” (Page 65).

The Local Transport Plan for Manchester (published in 2011) noted that:

“The key challenge will be to increase the mode share of public transport and cycling in order to accommodate the predicted 30% increase in inbound journeys, and maintain traffic at current levels, whilst improving traffic movements that will minimise traffic impact on the City Centre.”³

The Greater Manchester 2040 Strategy states that:

“Even with a rapid move towards low emission vehicles, unconstrained growth in car use will not make for efficient use of our limited highway capacity and will

continue to cause congestion and conflict with vulnerable road users. **We must therefore design our urban areas around the needs of people and not traffic and we must think differently about the long-term role of our critical highways networks.** [Emphasis added]⁴

3) is likely to increase private car traffic which would contribute to increased air pollution

Air pollution is a serious problem in the UK, and reduces life expectancy by an average of seven to eight months. In 2016, along with the Royal College of Paediatrics and Child Health (RCPCH), the Royal College of Physicians estimated that ambient air pollution causes approximately 40,000 premature deaths, over 6 million sick days and an estimated **total social cost of £22.6 billion per year.**⁵

In June 2018, IPPR North published research by King's College London which

“estimated that **1.6 million life years will be lost in Greater Manchester** in the coming century due to its poisonous air. This is equivalent to each of us having our life expectancy reduced by six months. Using the 2011 baseline, NO₂ pollution alone was estimated to have caused up to 1,781 premature deaths in Greater Manchester and particulate matter pollution up to 1,906 premature deaths.”

The research also estimated that air pollution has a

“£1 billion annual cost to the Greater Manchester economy.”⁶

This amount is approximately 20% of the annual Greater Manchester NHS health budget.

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.

According to the Greater Manchester 2040 Transport Strategy:

“Transport is a major source of all three emissions in the conurbation, contributing **76% of NO₂, 82% of particulates** and 32% of CO₂, due to the continued high dependence on traditional engine technology, and use of petrol and diesel to fuel vehicles”. [Emphasis added]⁷

This would indicate that the transport sector in Greater Manchester has followed the national trend of contributing a greater share of outdoor pollutants and climate change emissions.

The Greater Manchester Low Emissions Strategy and Air Quality Action Plan (GMLES) consultation document noted that between 2006 – 2011 that:

“emissions from road traffic accounted for over 60% of all NO₂ and PM₁₀ (particulate) emissions in Greater Manchester in 2006-11.”⁸

The GMLES also noted that:

“Private cars typically represents >70% of the vehicle movements on most roads, and so the influence of cars is significant in most areas where high pollutant concentrations have been identified. Furthermore, the large proportion of cars also influences areas of congestion due to the road space taken up by the vehicles.”⁹

and that:

“There are more private cars on our roads than any other type of vehicle. Not only are emissions per person/ passenger high, but cars also take up valuable road space, causing congestion and preventing the smooth operation of the road network. **Therefore, reducing emissions from cars and reducing the number of car trips is essential to achieve the objectives of the Action Plan.**” [Emphasis added]¹⁰

There is a primary school located very near to this proposed development.

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 NO₂.¹¹

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’.¹²

The previous National Planning Policy Framework (NPPF) stated 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).¹³

The revised NPPF guidance (February 2019) states that:

“Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, **and the cumulative impacts from individual sites in local areas.** Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.” (Para 181). (Emphasis added).¹⁴

Manchester currently has illegal levels of air pollution and is failing to meet its national government and European Union air quality obligations. Permitting developments that increase private car journeys and hence air pollution can only make this situation worse.

4) Is contrary to the actions required to radically reduce climate change emissions from the transport sector.

In June 2019, Friends of the Earth released a new study that highlighted that the Department for Transport's:

“continued failure to curb emissions will lead to the UK breaching existing carbon budgets over the next decade, even before budgets are tightened on the pathway to net zero.”¹⁵

Separate analysis indicated that for the United Kingdom to deliver on its new ‘net zero’ by 2050 greenhouse gas target a

“20% reduction in car travel needs to be a reality in the next 11 years.”¹⁶

According to the Greater Manchester 2040 Transport Strategy :

“Transport is a major source of all three emissions in the conurbation, contributing 76% of NO₂, 82% of particulates **and 32% of CO₂**, due to the continued high dependence on traditional engine technology, and use of petrol and diesel to fuel vehicles”. [Emphasis added]¹⁷

The Greater Manchester Low Emissions Strategy and Air Quality Action Plan consultation document noted that:

“Planned changes to public transport, incentives to change behaviour and action to encourage cycling and walking will not decrease private car usage at the rate needed to meet carbon reduction targets.”¹⁸

The Greater Manchester Transport 2040 Strategy states that:

“Reducing transport emissions is a particular challenge, given that economic and population growth will increase the demand for travel, **hence more radical measures will be needed to enable Greater Manchester to meet challenging standards and targets, in terms of air quality and in response to the challenge of climate change.**” (Emphasis added).¹⁹

In March 2019, Manchester along with the other 9 Greater Manchester local councils committed to the Greater Manchester ‘Carbon Neutral by 2038’ plan. The Zero Carbon Manchester Annual review 2019 stated that the recommended CO₂ emissions pathway to meet the carbon budget of 15 MtCO₂ requires an annual reduction of at least 13% per annum from 2018 onwards.

However, the review also highlighted that the annual inventory

“suggests energy-only CO₂ emissions have reduced by **3.4% and 2.5% in 2017 and 2018**. The lower reduction rates means that we need to compensate with larger reduction in annual emissions of **13.5% per annum from 2019 onwards.**”²⁰

On July 10th 2019, Manchester City Council supported a motion to declare a 'Climate Emergency'.²¹

Manchester Friends of the Earth believes that one crucial aspect of declaring a 'Climate Emergency' is for local authorities, businesses and civil society to recognise that 'business as usual' is no longer an option.

This planning application is an example of the 'business as usual' approach which needs to change.

The application is contrary to the stated Manchester City Council transport, environmental, Core Strategy and climate policies.

We would therefore urge the Planning & Highways Committee members to exercise their powers and refuse this planning application.

5th August 2019

End Notes

¹ See page 157

https://www.manchester.gov.uk/download/downloads/id/18981/final_core_strategy.pdf

² Latest data available. Transport Statistics Greater Manchester - Background Information

<https://data.gov.uk/dataset/39cfa67f-0e5a-4bde-a78b-ae7fdf53595b/transport-statistics-greater-manchester-background-information>

³ See page 14.

https://www.manchester.gov.uk/download/downloads/id/21375/local_area_implementation_plan.pdf

⁴ Page 33 <https://tfgm.com/2040>

⁵ <https://www.rcplondon.ac.uk/news/research-shows-44-uk-cities-breach-world-health-organization-guidelines-air-pollution>

⁶ Atmosphere: Towards a proper strategy for tackling Greater Manchester's air pollution crisis

<https://www.ippr.org/publications/atmosphere>

⁷ See page 23.

https://downloads.ctfassets.net/nv7y93idf4jq/7FiejTsJ68eaa8wQw8MiWw/bc4f3a45f6685148eba2acb618c2424f/03_GM_2040_TS_Full.pdf

⁸ See Page 59. <http://democracy.stockport.gov.uk/mgConvert2PDF.aspx?ID=91485>

⁹ Page 56. <http://democracy.stockport.gov.uk/mgConvert2PDF.aspx?ID=91485>

¹⁰ See Page 87. <http://democracy.stockport.gov.uk/mgConvert2PDF.aspx?ID=91485>

¹¹ [https://www.who.int/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health](https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health)

¹² <http://www.euro.who.int/en/data-and-evidence/evidence-informed-policy-making/publications/hen->

[summaries-of-network-members-reports/what-are-the-effects-of-air-pollution-on-childrens-health-and-development](#)

¹³ <https://www.gov.uk/guidance/national-planning-policy-framework/9-promoting-sustainable-transport>

¹⁴

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

¹⁵ <https://policy.friendsoftheearth.uk/insight/net-zero-carbon-budget-whole-transport-sector>

¹⁶ <https://friendsoftheearth.uk/climate-change/we-need-transport-revolution-uk-passes-net-zero-emissions-law>

¹⁷ See page 23.

https://downloads.ctfassets.net/nv7y93idf4jq/7FiejTsJ68eaa8wQw8MiWw/bc4f3a45f6685148eba2acb618c2424f/03_GM_2040_TS_Full.pdf

¹⁸ See Page 19

¹⁹ See page 7.

https://downloads.ctfassets.net/nv7y93idf4jq/7FiejTsJ68eaa8wQw8MiWw/bc4f3a45f6685148eba2acb618c2424f/03_GM_2040_TS_Full.pdf

²⁰ http://www.manchesterclimate.com/sites/default/files/ZeroCarbon_AR_19_1.pdf

²¹

https://secure.manchester.gov.uk/news/article/8194/manchester_city_council_debate_climate_emergency_motion