



Roads have far reaching effects.

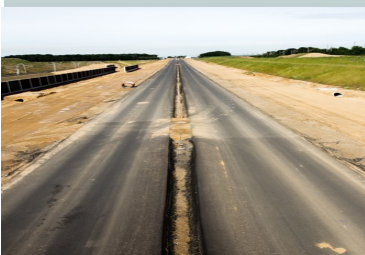
They

- . scar landscapes
- . use substantial natural resources such as minerals and aggregates



They

- . shrink natural drainage areas
- . reduce habitats
- . take productive agricultural land



They

- . open new areas for development
- . allow urban sprawl
- . induce extra traffic
- . increase air, noise and light pollution
- . perform against achieving modal shift



**A reasoned objection by:
the North West Transport
Roundtable (NW TAR) and
the Campaign for Better
Transport (CfBT) to:
the planning application for
the A6 to Manchester Airport
SEMMMS Relief Road (A6 MARR)
December 2013**

Two decades ago the government's leading independent adviser on transport, the Standing Advisory Committee on Trunk Road Assessment (SACTRA) proved that building new roads generates more traffic and found that, in a mature economy such as that which exists in the UK, there is no given connection between providing new transport infrastructure and economic benefit

CONTENTS

	Pages
Executive Summary	3
Introduction	4
Generic & over-arching environmental /qualitative reasons why we object to roads per se & the A6 MARR	5
Some quantitative reasons for our objections:	6 — 69
 An evidence paper on traffic trends & forecasts by Sian Berry, Road Campaigner, Campaign for Better Transport (CfBT)	 6—22
 A paper analysing the scheme’s justifications & use of traffic data by Keith Buchan, Director, Metropolitan Transport Research Unit	 23—42
 A paper on the air quality/climate change aspects of the environment statement by Helen Rimmer, North West Campaigner, Friends of the Earth (FOE)	 43—52
 A paper reviewing the scheme’s Health Impact Assessment (HIA) by David Butler, NW TAR Core Group member/CTC Right to Ride rep. & Anon	 53—67
 A paper reviewing public footpath impacts of the scheme by Janet Cuff, NW TAR Core Group member/committee member of CPRE Stockport District/ Stockport WalkaDay leader/ lifelong rambler	 68—69
 Appendix:	
 Objection letter from Friends of the Peak District by Dr. Anne Robinson	 71—76

EXECUTIVE SUMMARY

The case is mounting against the South East Manchester Multi Modal Study (SEMMMS) roads per se and the A6 to Manchester Airport Road (A6 MARR) in particular. The plan to build this network of roads runs contrary to all good sense and a mounting volume of evidence. The concept has no environmental credentials and will have any number of negative effects that will impinge on quality of life in S.E. Manchester/N.E. Cheshire

In this submission objecting to the A6 MARR we demonstrate that:

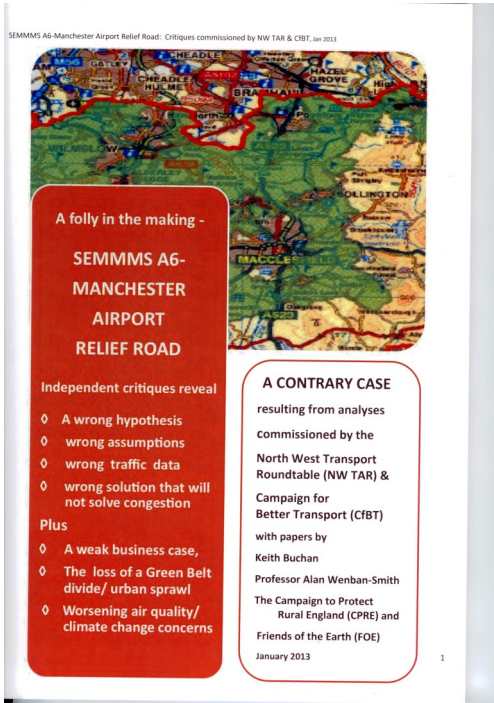
- **Traffic growth has been flattening out and falling both nationally and in the wider SEMMMS area for some years, cancelling out a key argument for roadbuilding**
- **There are flaws in many assumptions behind the transport forecasts**
- **There are many questionable aspects to the modelling which did not examine a sufficiently wide geographical area and failed to model walking and cycling**
- **Economic modelling has been overly optimistic and speculative and the economic case is still unproven**
- **The health impact assessment is wrong to assume there would be more benefits than disbenefits from the scheme based on assertions about economic opportunities**
- **Properly conducted tests on alternatives to roadbuilding were not carried out**
- **The scheme will not meet its objectives**
- **Modal split in the target area is already dominated by car and will not be helped**
- **Insufficient attention has been paid to air pollution and knock-on health impacts**
- **Overall, harmful emissions will rise, breaching EU standards**
- **Building the road(s) will, in effect, drive a horse and cart through sustainability and carbon reduction plans & policies the promoting local authorities are signed up to**
- **The impact of increased noise pollution as well as air pollution is likely to have a real detrimental effect on people's health**
- **The big populations within easy access to rolling countryside would lose a precious and very convenient resource on the urban fringe where it is currently possible to quickly get away from the stresses of modern day life and enjoy some tranquillity**
- **The Green Belt will be breached between Greater Manchester and Cheshire East**

INTRODUCTION

The North West Transport Roundtable (NW TAR) and the Campaign for Better Transport (CfBT) object to the A6 to Manchester Airport Relief Road (A6 MARR), the first of the South East Manchester Multi Modal Study (SEMMMS) network of roads to proceed through the planning process. Our reasons are multi-faceted and we have already set out many of them in our responses to the first and second stage consultations.

For the first stage consultation we produced ‘A folly in the making’ which critiqued the case for the road (below) 1

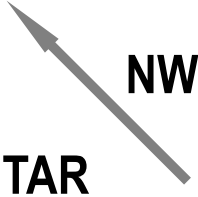
For the second stage we produced ‘More reasons why the A6-Manchester SEMMMS Road should not be commissioned’ (below) 2



As is evident, we are serious non-governmental organisations which believe our case against this road and the remainder of the SEMMMS roads is strong . We therefore look to the Secretary of State for Communities & Local Government to ‘call in’ the planning applications for this and future SEMMMS roads in order that they can be properly and fully appraised via the public inquiry process by an independent planning inspector.

LILLIAN BURNS
Convenor
North West Transport Roundtable

SIAN BERRY
Road Campaigner
Campaign for Better Transport



1 & 2 Both these publications are downloadable from the NW TAR website (www.nwtar.org.uk) and the CfBT website (www.bettertransport.org.uk)

ENVIRONMENTAL/QUALITATIVE REASONS WHY WE OBJECT TO A6 MARR

There are many generic environmental reasons why road building is not a good idea. The following all apply to the A6 to Manchester Airport Relief Road (A6 MARR) and would also apply to the remainder of the South East Manchester Multi Modal Study (SEMMMS) network of roads. They impact on environmental capacity because they:

- ◇ scar landscapes
- ◇ use substantial natural resources such as minerals and aggregates
- ◇ shrink natural drainage areas
- ◇ reduce wildlife habitats
- ◇ take productive agricultural land
- ◇ open new areas for development
- ◇ facilitate urban sprawl
- ◇ induce extra traffic
- ◇ increase air, noise and light pollution
- ◇ perform against achieving modal shift

And, because of the induced traffic phenomenon (brought on by people changing their routes, taking on longer commutes, and expanding their leisure and shopping habits), new roads are only ever a short term solution. They promote yet more roads. It is worth noting here that the National Planning Policy Framework (NPPF) states transport policies have an important role to play in facilitating **sustainable** development (our highlighting) but also in contributing to wider sustainability and health objectives. The transport section opens with a call to balance the transport system in favour of sustainable modes, ie. modes with a low environmental impact.

Other specific reasons which apply in the case of the A6 MARR are :

- ◇ it would gouge through pleasant rolling countryside on the urban fringe
- ◇ it would desecrate an ancient woodland and ponds containing protected species
- ◇ it would impact on flood plains
- ◇ it would result in a loss of productive grazing and farmland
- ◇ it would facilitate the closing up of a narrow area of Green Belt between the edge of the Greater Manchester conurbation and settlements in Cheshire East
- ◇ it would cause worse traffic problems and air quality in some areas eg. Disley
- ◇ it would create traffic noise and light pollution where none currently exist
- ◇ it would deleteriously impact on some tranquil areas and footpaths
- ◇ it would help facilitate the building of the remainder of the SEMMMS roads
- ◇ this and the other SEMMMS roads would lead to creeping urbanisation in Cheshire

QUANTITATIVE REASONS FOR OUR OBJECTIONS

AN EVIDENCE PAPER ON TRAFFIC TRENDS AND FORECASTS BY SIAN BERRY,
ROADS CAMPAIGNER, CAMPAIGN FOR BETTER TRANSPORT (CfbT)



SEMMMS ¹ A6 to Manchester Airport Relief Road (A6 MARR)
The case against the road in terms of traffic trends and forecasts

Contents :

Summary 2

Introduction..... 3

1. Recent traffic trends show a slowdown in growth since the 1990s and a fall in traffic over the past decade [nationally, regionally and locally](#) 4

3. Continued flaws in the assumptions behind the DfT Road Transport Forecasts 2013 12

4. Other objections to the way the economic case for the road has been put forward 17

1 SEMMMS – South East Manchester Multi Modal Study

Summary

Campaign for Better Transport objects to the SEMMMS A6 MARR project on a number of grounds, including:

- Widespread and highly detrimental environmental effects** on the Peak District National Park, the Green Belt, local green spaces, agricultural land, flood risks, noise pollution and vital ecology, including ancient woodland.
- Reliance on the SEMMMS study from 2001**, as the reason for not examining other options, despite many changes in the local and regional transport situation since then, and large changes in local and national government policies.
- The road is predicted to increase traffic in the area and would not solve congestion.** All new roads generate new trips and new traffic. Rather than take advantage of the 'breathing space' provided by recent traffic changes to invest in and make space for alternative travel, the proposal would encourage more travel by car and over longer distances.
- The project runs contrary to national planning and climate change laws**, including commitments made in the Climate Change Act, and a number of provisions in the National Planning Policy Framework, particularly those aimed at sustainable transport and reducing the need to travel.
- The road will lead to increases in air pollution in ways that may not be legal**, breaching EU legal standards for air quality in new areas and worsening air pollution in existing Air Quality Management Areas.

This document is part of a joint report compiled by NW TAR giving more details on a number of different aspects of the case against the road. It focuses on presenting up to date traffic data that shows road traffic reducing over the past decade nationally, regionally and locally.

It also demonstrates deficiencies in future forecasts of road traffic, which persist in the forecasts used to calculate the business case for this road. As a result, traffic growth has been lower than forecast since the 1980s and the current forecasts are likely to overestimate future traffic severely.

The benefits of the road as presented in the business case overwhelmingly rely on predictions of future travel time savings over many years, based on these forecasts (95% of calculate benefits are travel time savings). Therefore, the likely inaccuracy of these forecasts mean that the case for building the A6 MARR is at best shaky and at worst completely unfounded.

Investment in alternatives to car travel in the area, such as new rail and metro links, buses, walking and cycling infrastructure and 'smarter choices' programmes of behaviour change, would be a much more constructive use of public money. The proposed scheme will simply serve to encourage large amounts of new car travel and an entirely avoidable increase in car dependency in the area, undermining the positive recent trends.

I

Introduction

Recent traffic trends and the inaccuracy of – and over-reliance on – future forecasts of road traffic show that the case for building the A6 MARR is unfounded. Investment in alternatives to car travel in the area, such as new rail and metro links, buses, walking and cycling infrastructure would be a much more constructive use of public money. The proposed scheme will simply serve to encourage large amounts of new car travel and an entirely avoidable increase in car dependency in the area, undermining the positive recent trends.

In addition to the environmental, social and economic problems caused by increased traffic, the road will also contribute to increases in air pollution, potentially breaching legal limits.

Sections 1-4 below set out the reasons for our views on traffic, forecasts and recent trends in more detail.

1. Recent traffic trends show a slowdown in growth since the 1990s and a fall in traffic over the past decade nationally, regionally and locally

Nationally:

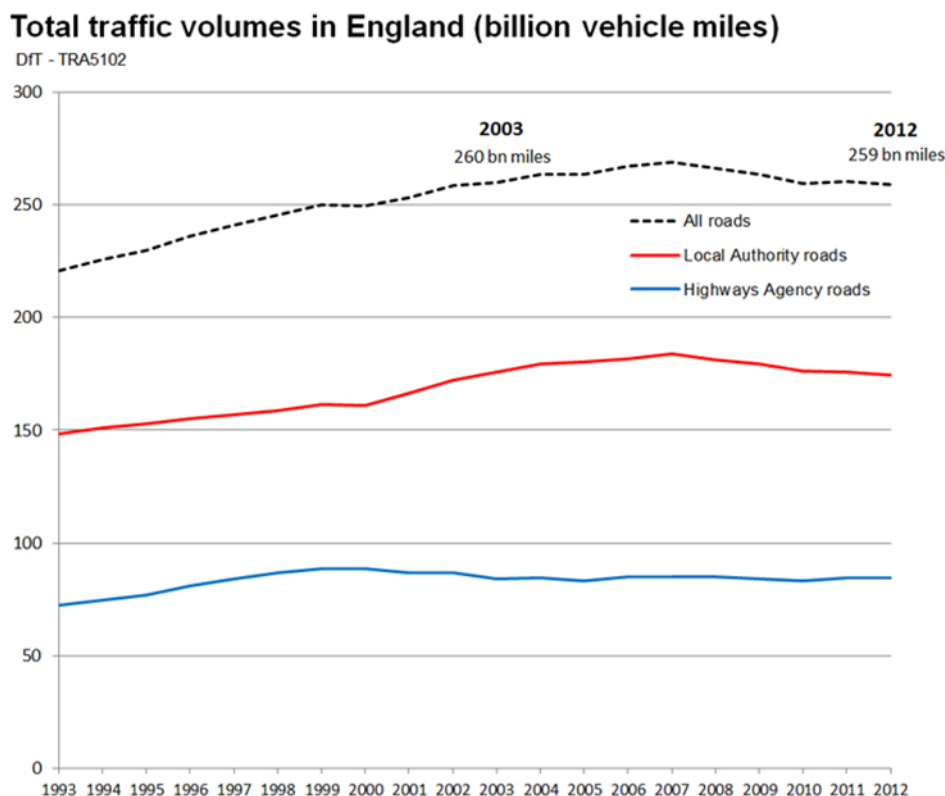
Traffic across England and Great Britain has seen a significant divergence from historical trends in recent years.

Nationally and locally, most charts of traffic growth since 2000 show a pattern of this general form:

- A clear flattening off in traffic growth in the period 2001 to 2006/7;
- An obvious decline from 2006/7;
- A flattening off of this decline since around 2010

The latest DfT traffic statistics for 2012 show that the amount of traffic is now below the level seen in 2003 (259 billion vehicle miles per year, vs 260 billion ten years ago).

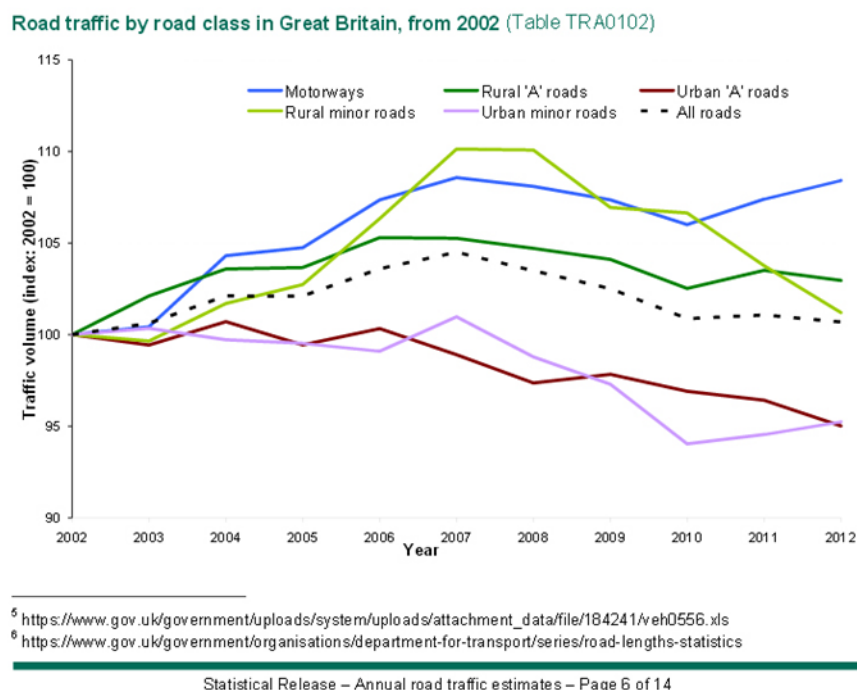
Fig 1.1: Total traffic volumes in England (billion vehicle miles) ²



This general pattern is also shown in the chart in figure 1.2, from the 2013 national traffic forecasts document, which shows trends since 2002 for different road types.

² Department for Transport road traffic statistics 2012, table TRA5102
<https://www.gov.uk/government/organisations/department-for-transport/series/road-traffic-statistics>

Fig 1.2: Road traffic on different road types across Great Britain



The most recent National Travel Survey also illustrates how driving patterns are changing on a per-person basis, raising serious questions about national traffic forecasts' reliance on population growth as a driver for a dramatic increase in traffic:

Key statistics from the 2012 National Travel Survey include:"

The number of trips per person (by any mode) has been in steep decline since the start of the statistics in 1997 – down by 12% during this 15 year period from 1086 trips per person per year in 1997 to 954 trips in 2012

Each trip has grown longer, but the distance travelled by car is also down. The distance travelled per person per year in 2012 was down by 4% compared with 1997 for all modes of transport and down 7% for driving in a car or van

The annual average distance travelled per car has fallen 11% since 2002

Car ownership levels are now lower than in 2005 at 1.13 cars per household (in 2005 it was 1.15 cars per household)

In the area around the A555:

The National Travel Survey cannot be analysed at a local level, but similar trends in traffic levels are seen in the north west region, and in Manchester, Stockport and Cheshire East.

3 Road Transport Forecasts 2013. Department for Transport, July 2013 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/225483/road-transport-forecasts-2013-extended-version.pdf

4 National Travel Survey statistics <https://www.gov.uk/government/organisations/department-for-transport/series/national-travel-survey-statistics>

5 Campaign for Better Transport briefing on the National Travel Survey, July 2013 http://www.bettertransport.org.uk/files/CfBT_NTS_2012_new_data_FINAL.pdf

6 Campaign for Better Transport briefing on the National Travel Survey, July 2013 http://www.bettertransport.org.uk/files/CfBT_NTS_2012_new_data_FINAL.pdf

Fig 13: Minimal change in traffic in the north west between 1982 and 2012 ⁷

Percentage point change in road traffic by English Regions, between 1982 and 2012 (Table TRA8901)

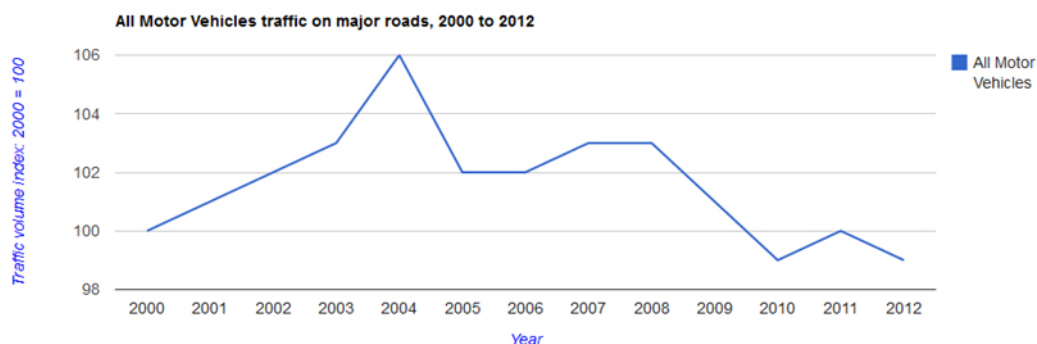


Fig 1.4: Traffic trends across all count points in Manchester (City Council area) ⁸

Total traffic on major roads, in thousand vehicle miles, from 2000 to 2012

Year	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
Count points	149	148	148	148	149	152	152	152	153	153	153	153	153
Pedal Cycles	4,433	4,454	4,274	4,653	3,973	3,361	4,772	3,895	5,200	5,696	5,878	6,671	6,322
Motorcycles	5,753	5,591	5,638	6,059	4,981	4,851	4,753	4,574	4,304	4,474	4,326	4,151	4,239
Cars	797,491	802,714	813,800	824,565	842,388	812,371	816,093	820,585	824,146	807,384	785,231	795,715	789,116
Buses & Coaches	16,864	17,131	16,290	15,076	14,089	14,476	14,465	14,123	14,214	14,621	15,940	15,012	14,933
Light Goods Vehicles	92,803	93,755	94,780	96,959	102,326	95,350	98,830	103,737	101,298	99,433	94,579	104,080	105,174
All HGVs	41,763	42,378	41,832	42,037	44,173	42,277	40,840	40,876	40,962	41,037	40,993	36,756	33,323
All Motor Vehicles	954,665	961,565	972,335	984,673	1,007,963	969,314	974,976	983,896	984,928	966,970	941,065	955,724	946,751

All motor vehicles on major roads 2000 to 2012



⁷ Road Transport Forecasts 2013. Department for Transport, July 2013 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/225483/road-transport-forecasts-2013-extended-version.pdf

⁸ DfT Traffic Counts website: <http://www.dft.gov.uk/traffic-counts/area.php?region=North+West&la=Manchester>

Fig 1.5: Traffic trends across all count points in Stockport 9

Total traffic on major roads, in thousand vehicle miles, from 2000 to 2012

Year	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
Count points	64	64	64	64	64	64	64	64	64	64	64	64	64
Pedal Cycles	1,975	2,090	1,818	2,407	1,788	1,381	1,786	1,361	1,837	1,921	2,013	2,237	2,127
Motorcycles	3,735	3,731	3,726	4,032	3,310	3,215	3,240	3,142	2,821	2,942	2,953	2,880	2,793
Cars	520,614	580,901	581,713	590,098	607,439	574,782	586,947	584,306	587,997	588,128	571,612	579,070	576,984
Buses & Coaches	5,746	6,147	5,904	5,933	5,594	5,548	5,742	5,355	4,601	4,517	5,140	4,539	4,554
Light Goods Vehicles	64,454	71,072	74,276	77,331	81,593	75,186	78,492	79,742	78,723	78,834	78,046	86,500	87,783
All HGVs	32,744	35,649	34,759	36,265	38,961	38,987	37,538	37,099	36,595	34,696	37,869	29,007	27,891
All Motor Vehicles	627,295	697,500	700,375	713,659	736,898	697,720	711,959	709,639	710,739	709,123	695,622	701,994	699,995

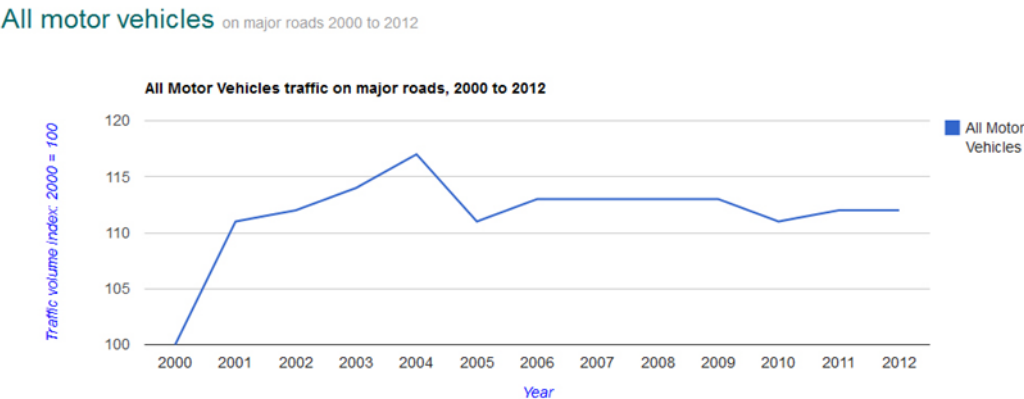
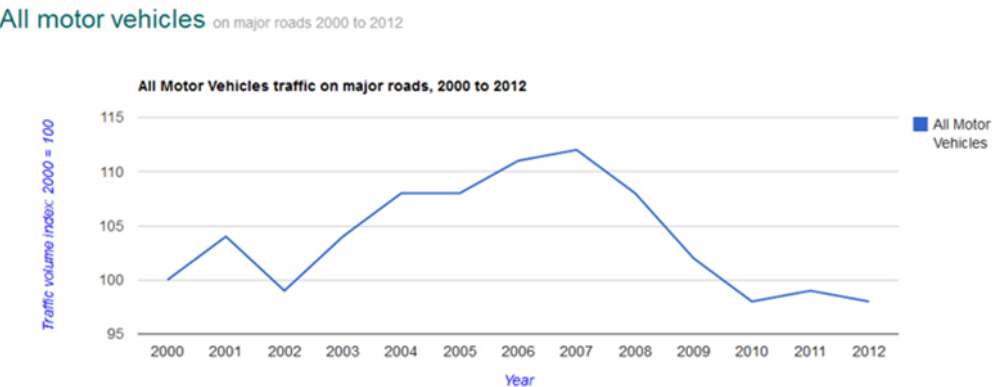


Fig 1.6: Traffic trends across all count points in Cheshire East 10

Total traffic on major roads, in thousand vehicle miles, from 2000 to 2012

Year	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
Count points	165	165	166	167	173	176	176	176	176	184	184	181	181
Pedal Cycles	4,388	3,847	3,474	3,381	3,135	2,881	3,561	2,794	3,302	3,628	3,762	3,906	3,761
Motorcycles	11,878	11,726	11,501	12,348	11,626	11,592	11,109	9,764	10,477	10,429	10,681	10,230	9,381
Cars	1,701,578	1,773,010	1,710,421	1,767,922	1,845,371	1,846,699	1,880,662	1,883,717	1,822,739	1,747,957	1,690,622	1,698,757	1,685,896
Buses & Coaches	13,668	13,051	10,427	11,580	11,988	12,218	11,862	11,324	9,673	9,246	9,536	9,478	9,167
Light Goods Vehicles	215,123	213,461	199,394	224,302	232,934	238,927	267,222	268,733	263,590	241,115	227,036	252,733	259,596
All HGVs	256,467	265,249	247,180	274,670	274,221	269,741	274,352	285,984	267,092	231,517	226,266	204,807	199,537
All Motor Vehicles	2,198,728	2,276,495	2,178,924	2,290,836	2,376,137	2,379,170	2,445,198	2,459,514	2,373,583	2,240,276	2,164,124	2,176,006	2,163,534



9 DfT Traffic Counts website: <http://www.dft.gov.uk/traffic-counts/area.php?region=North+West&la=Stockport>
10 DfT Traffic Counts website: <http://www.dft.gov.uk/traffic-counts/cp.php?la=East+Cheshire>

We have also downloaded and analysed traffic data between 2000 and 2012 (from the Department for Transport's Traffic Counts website) for count points on the current A555, and for relevant count points on roads in Stockport, Cheshire East and Manchester that will be closely linked with the proposed new road.

The relevant identification numbers for the count points are shown in the map on the next page and the charts below present the relevant changes in traffic for the following roads or groups of roads. For each group of roads, the change in traffic levels between 2000 and 2012 (% change) is shown for all traffic (**bold**) and for HGVs (*italic*):

M56 west of Manchester Airport (**+3.0%**, *-20.6%*)

A538 West of Manchester Airport (**-11.0%**, *-4.2%*)

A538 East of Manchester Airport (**+10.3%**, *-15.0%*)

A34 North and South of the A555 (**+4.8%**, *-18.2%*)

A6 through Hazel Grove (**-7.6%**, *-32.9%*)

A523, A5149 and A5102 roads on routes to/from current A555 (**-9.3%**, *-27.7%*)

Average for all A roads excluding the motorway (-1.5%, -22.9%)

Fig 1.7: Count points around the proposed new road¹¹

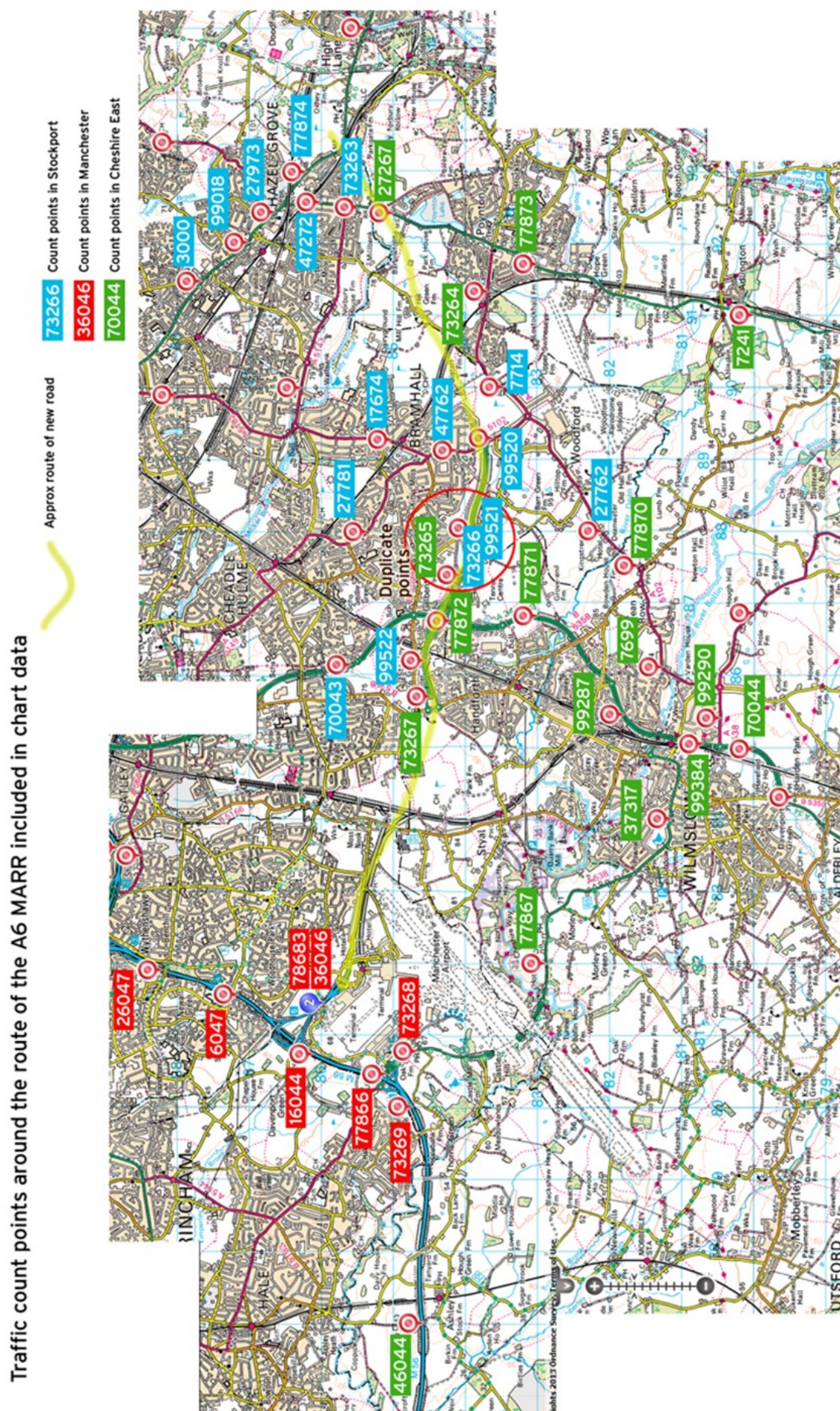


Fig 1.8: Traffic trends on the M56 west of Manchester Airport – all traffic

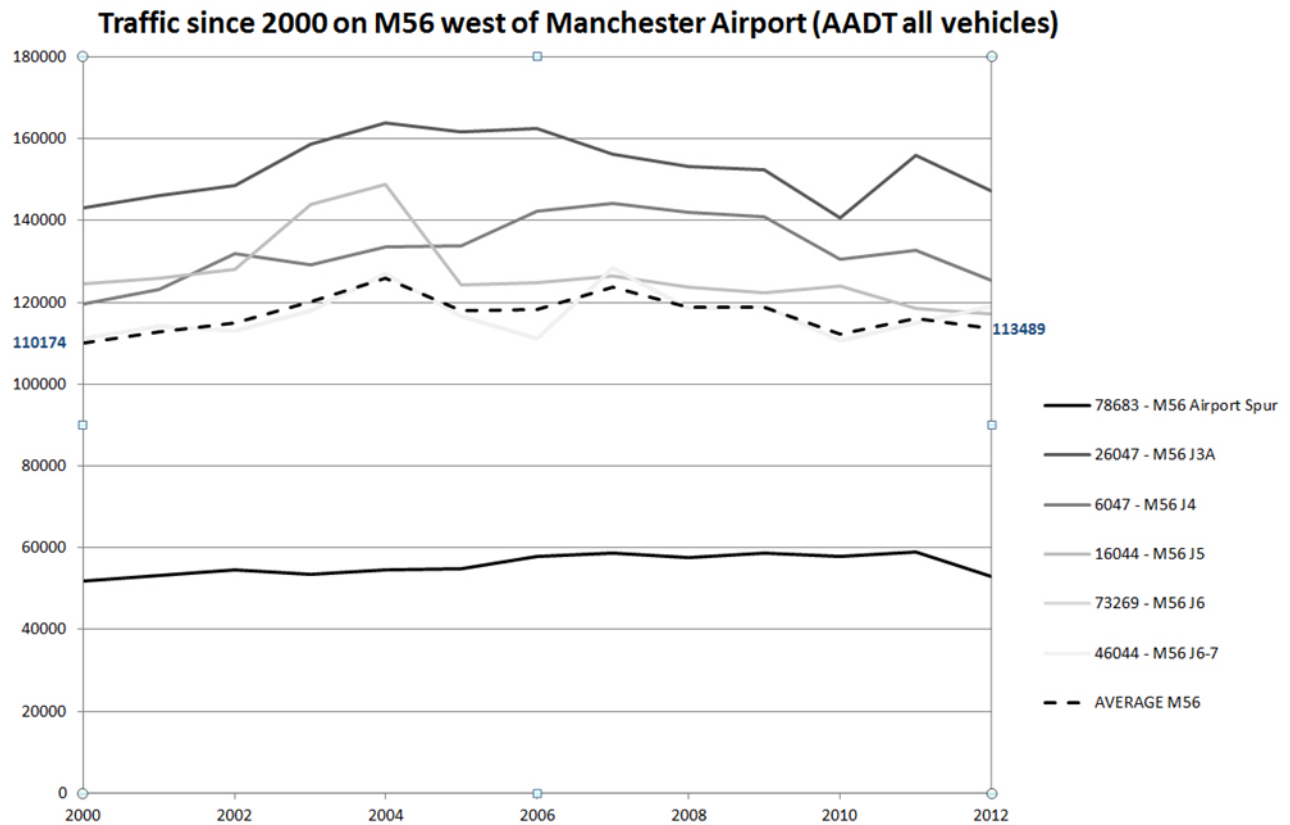


Fig 1.9: Traffic trends on the M56 west of Manchester Airport – HGV traffic

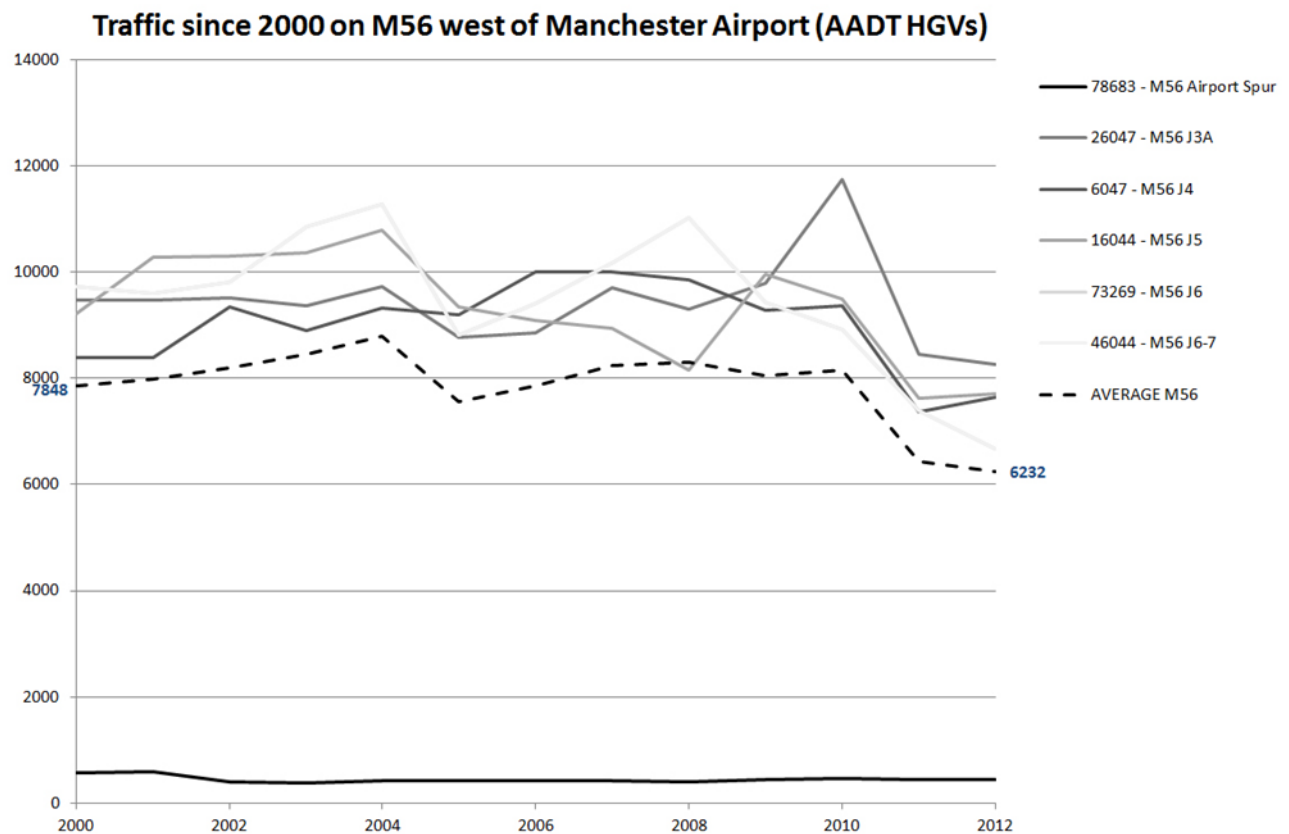


Fig 1.10: Traffic trends on A-roads around the proposed A6 MARR – all traffic

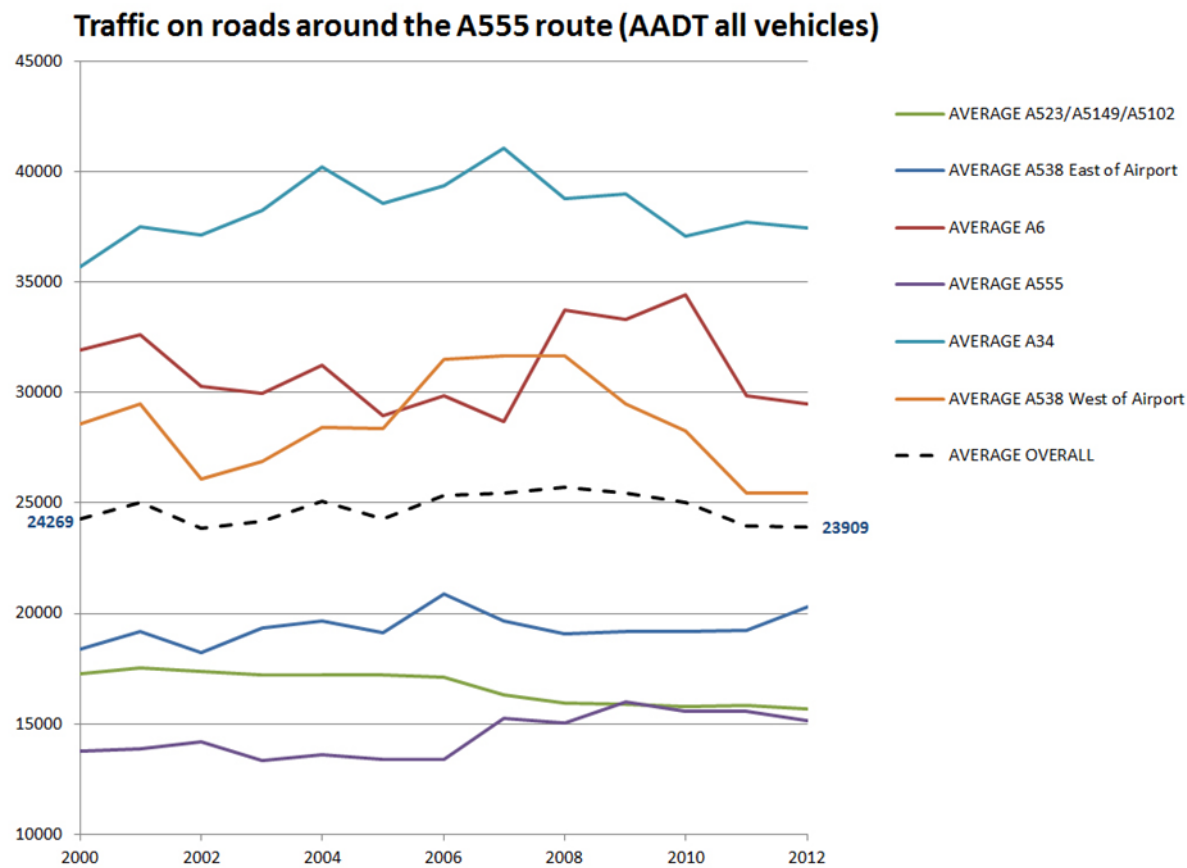
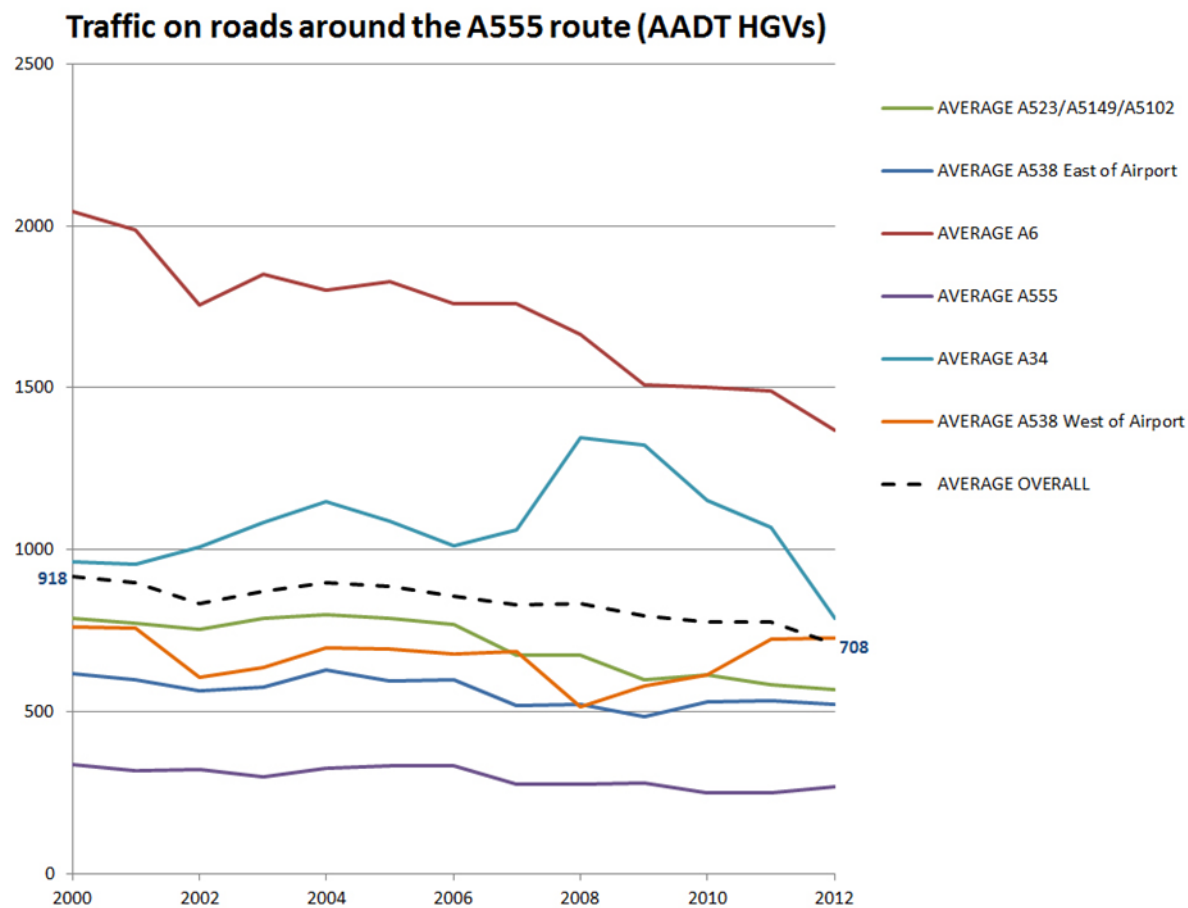


Fig 1.11: Traffic trends on A-roads around the proposed A6 MARR – HGV traffic



From all this evidence we can clearly conclude that traffic in the area around the proposed new road has been flat or declining in the 12 years since 2000. The overall drop in traffic is 1.5%, with a sharper decline of 22.9% seen for HGVs.

These trends clearly call into question the wisdom of building a new road in this area now, when congestion and traffic are below what they have been at their peak, with several years of strong growth needed even to bring them up to levels that have previously been experienced.

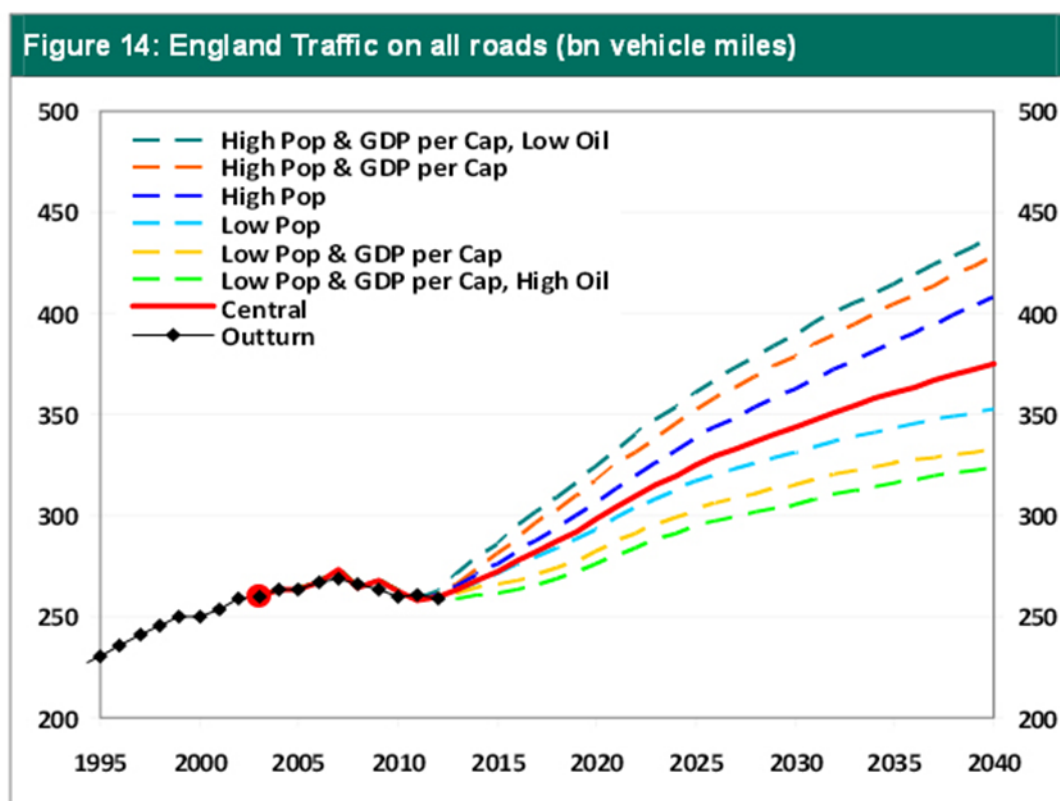
Far better would be to take advantage of the 'breathing space' provided by the recent trends and put in measures to consolidate this change and encourage further reductions, rather than road-building measures that are guaranteed to induce new traffic.

Figure 1.11 in particular shows considerable 'breathing space' before the flow of heavy goods vehicles on nearby roads could possibly return to peak levels. This would allow for a number of new HGV moments to be generated by developments around Manchester Airport and the related Enterprise Zone without creating a clear justification for new road-building. Workers and other people travelling to the Airport and Enterprise Zone would of course be more economically and sustainably served by new public transport links, which would also be of more benefit to nearby areas of low car ownership and deprivation that the Enterprise Zone is intended to support with jobs and economic development.

2. Since the 1990s, DfT traffic forecasts have predicted growth far ahead of what has been seen

Recent national and regional traffic trends also call into question the reliability of the DfT's traffic forecasts, upon which the business case for the road relies. The chart below shows the latest (2013) National Road Transport Forecast from the DfT for total traffic on the road network.

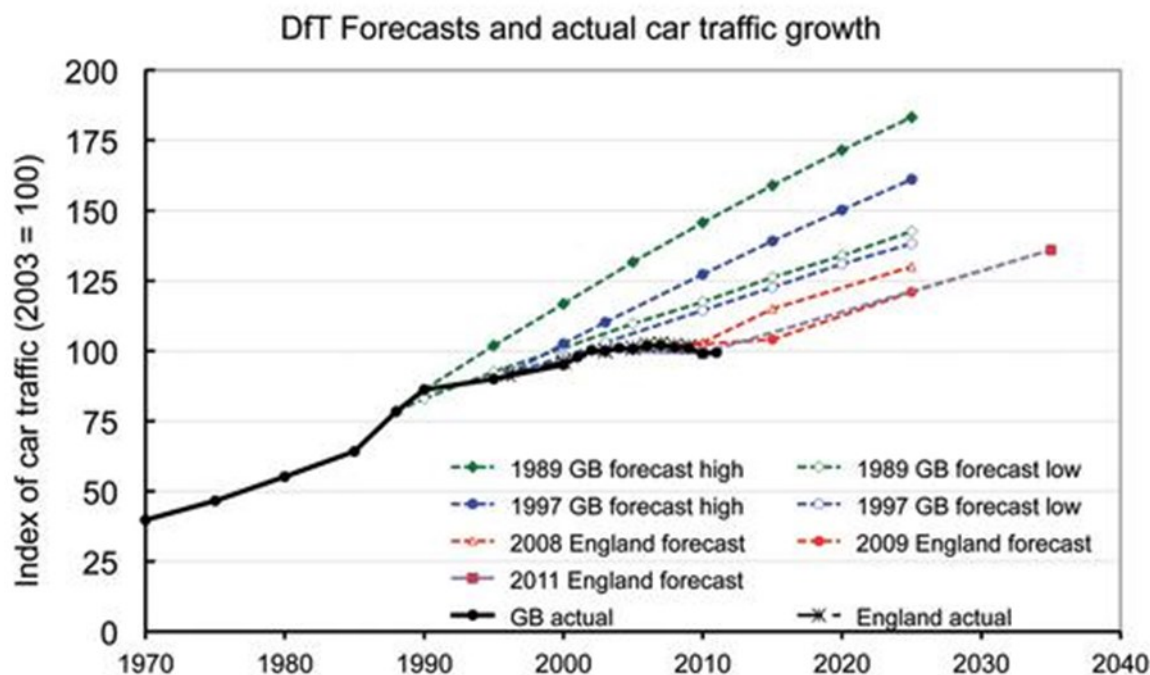
Fig 2.1: DfT traffic forecasts – all traffic ¹²



¹² Road Transport Forecasts 2013. Department for Transport, July 2013
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/225483/road-transport-forecasts-2013-extended-version.pdf

There is abundant evidence that forecasts like this have consistently over-estimated traffic growth since the 1980s, particularly when trying to predict long-term trends. The chart below, reproduced from a recent article by Professor Phil Goodwin of UCL/UWE ¹³ shows this very clearly in a comparison of the actual traffic levels seen in England compared with forecasts made from 1989 to 2011. There has been a large discrepancy between predicted and actual traffic since 1989, when traffic growth first started to flatten out (long before the current recession).

Fig 2.2: Performance of DfT traffic forecasts since 1989 ¹⁴



This record of forecasts being proved wrong over several decades has now led to a near consensus among academics and transport and planning bodies that the methods and assumptions underlying the National Transport Model (NTM), which underlies the DfT's road traffic forecasts, need to be examined and revised in order to make the model and forecasts more accurate and useful.

Why this matters in the case for the road:

This matters because, with a more realistic forecast of future traffic levels without the road, the modelled time 'savings' due to the road would be much smaller, particularly the component of these savings that comes from long-term predictions as the savings are calculated over a 60 year appraisal period.

If lower and more realistic traffic forecasts were used, this would be likely to reduce or eliminate the economic case for the road because this case relies heavily on future growth in traffic, based on these forecasts.

Evidence that the economic case for the road relies heavily on driver time savings - and therefore on predictions of future growth in traffic – can be seen by looking at data given in the Economic Assessment report prepared in 2012 by Atkins on behalf of the SEMMMS Project Team ¹⁵

¹³ Due diligence, traffic forecasts and pensions, Goodwin P, LTT April 2012, <http://www.bettertransport.org.uk/campaigns/roads-to-nowhere/ltt-130412>

¹⁴ Due diligence, traffic forecasts and pensions, Goodwin P, LTT April 2012, <http://www.bettertransport.org.uk/campaigns/roads-to-nowhere/ltt-130412>

¹⁵ Economic Assessment Report, November 2012 <http://www.semmms.info/140683/638805/economicassessmentreport>

The total economic benefits are given (In 2002 currency) for the core scenario as (table 3.1):

- **Present value of benefits: £879.7 million**

This includes monetised benefits (over 60 years in 2002 currency) from the following factors assessed (from tables 3.6 and 3.7):

Greenhouse gas disbenefits	-£1.1 million
Accident benefits	+£16.0 million
Vehicle operating cost savings	+£47.5 million
Travel time savings – commuters	+£169.2 million
Travel time savings - businesses	+£379.7 million
Travel time savings – others	+£283.6 million
TOTAL TRAVEL TIME SAVINGS	+£832.5 million

These figures enable an estimate to be made of the reliance on time savings for scheme benefits. In total, travel time savings make up £832.5 million – **or 95%** - of the total benefits of the scheme.

It is important to remember that each of the time 'savings' reported in the economic assessment are compared with what is predicted to be the case with no road-building along the route, based on current traffic forecasts, and that because of strong long-term traffic growth being predicted, these time 'savings' become larger as time goes on, further exacerbating the effect of the forecasts on the calculated benefits of the scheme.

3. Continued flaws in the assumptions behind the DfT Road Transport Forecasts 2013

There are several reasons for the discrepancies noted by Prof Goodwin above between DfT forecasts and actual traffic levels. Unfortunately, all of these remain in the forecasts used to appraise the A6 MARR and in the most recent update published in July 2013.

Limits of key drivers

The main problem is the limited number of 'key drivers' that lead to forecasts of traffic growth, as well as a number of out-of-date assumptions about behaviour.

The DfT Road Transport Forecasts document outlines these three key drivers and their assumed effects on traffic ¹⁶. The three key drivers are:

Population

Economic Growth

Cost of Driving

¹⁶ Road Transport Forecasts 2013. Department for Transport, July 2013 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/225483/road-transport-forecasts-2013-extended-version.pdf

The more detailed National Trip End Model (NTEM) does look at factors such as population density and demographics in working out local variations in demand for travel by car, but ultimately these are 'constrained' or adjusted to fit in with the macro picture determined by these three factors. By using so few factors in estimating macro-level changes in demand, the forecasts ignore a range of important nation-wide changes in behaviour, demographics, land-use and technology, including.

- **Changes in technology that affect behaviour** – especially relevant to the steady reduction in trip rates by all modes seen since 1997
 - **Changes in culture between generations** – younger people are currently assumed as they age to adopt the same driving patterns as people in today's older age groups. It is much more likely that future generations raised since the 1990s, who currently have low driving rates, will have different driving habits as they age to the people who grew up in the 1970s or 1950s
- Changes in town planning** – for example the 'town centre first' planning policies that are attributed to a proportion of the reduction in driving seen in the 'On the Move' report

These failings are in fact all acknowledged in the chapter 'Uncertainty and modelling' in the forecast documentation, but are currently not used to alter the model.

Out of date assumptions

In addition, a range of assumptions used in the NTEM and the overall forecasts are out of date. There are plans to make updates to these in the near future, but these are also not represented in the current forecasts.

Trip rates – the 2013 Road Transport Forecasts document admits that trip rate data is very out of date ¹⁷:

- *"2.18 At the moment Trip Rates are based on National Travel Survey (NTS) data from 1988-1996." Trip rates are also assumed to be constant over time for each type of person (split according to age, car ownership and employment) and future changes to the model are planned to allow these to vary through time."*
- **Population distribution** – the NTEM uses Office for National Statistics population projections from 2010 ¹⁸. These are in turn based on distribution patterns from the 2001 census, with new housing and other trip-generating developments also noted. The next set of detailed data on changes in population, based on the 2011 Census, is likely to show a higher level of overall population growth but a very different distribution focused mainly on larger cities that have lower cultural and practical levels of car use and better public transport networks.

All of these issues lead to a tendency to produce unrealistically high forecasts over the long term, although the reliance on economic growth and driving costs as a factor has led to some recent short-term predictions of traffic falling. This tendency to produce unrealistically high long-term growth predictions is most clearly shown in the chart below from the current forecast document, where the number of car miles driven per person is predicted to increase rapidly, despite being one of the measures with the sharpest drop in recent years.

¹⁷ Road Transport Forecasts 2013. Department for Transport, July 2013 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/225483/road-transport-forecasts-2013-extended-version.pdf

Fig 3.1: DfT forecasts for miles driven per person ¹⁹

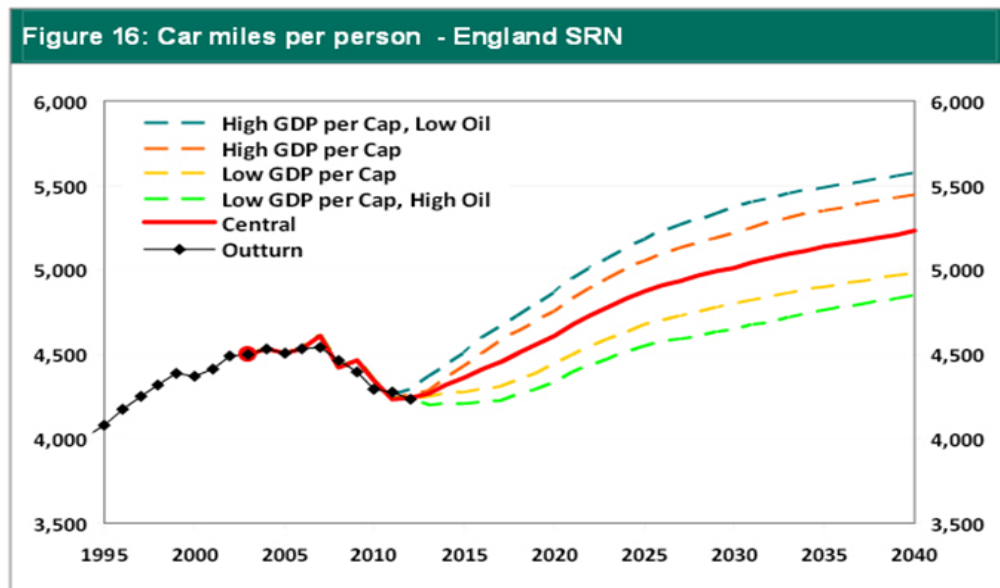
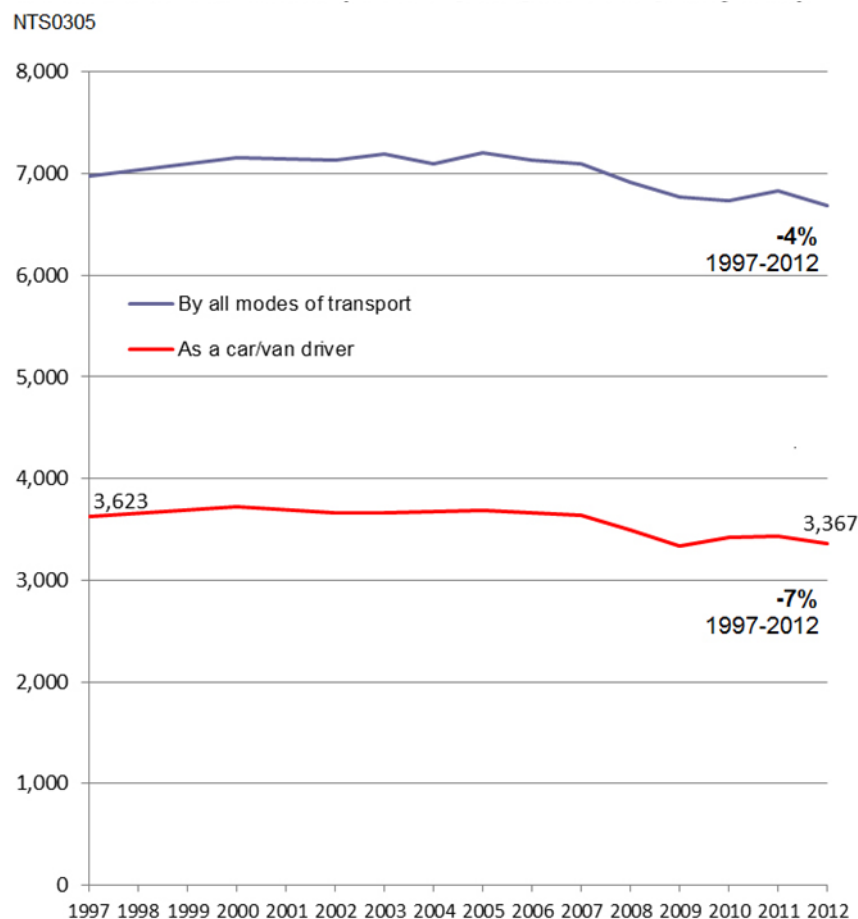


Fig 3.2: Reduction in miles driven (per person per year) since 1997, from National Travel Survey, table 0305 ²⁰



¹⁹ Road Transport Forecasts 2013. Department for Transport, July 2013 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/225483/road-transport-forecasts-2013-extended-version.pdf ((NB: the NTS data is not broken down between the strategic road network and ordinary roads, so it is unclear where the historical data in this chart has been obtained from))

²⁰ National Travel Survey statistics <https://www.gov.uk/government/organisations/department-for-transport/series/national-travel-survey-statistics>

4. Other objections to the way the economic case for the road has been put forward

There are enormous problems with the WebTAG method of calculating costs and benefits, which relies too heavily for benefits on small time savings for drivers, while failing sufficiently to take into account very real costs, including health, environmental and social costs.

As shown in section 2, the economic assessment of the scheme carried out by Atkins (which gives a summary of WebTAG outputs of costs and benefits) only includes monetary estimates of a very small number of factors. A very wide range of impacts are not included in the calculations at all. The table below summarises which impacts are considered as wider factors but not monetised, and which are finally included in the benefit-cost ratio calculations for a project.

Social, environmental or economic impact	Captured in appraisal	Considered but not monetised	Not captured
Carbon savings	X		
Air pollution		X	
Noise	X		
Social effects of congestion		X	
Social exclusion effects of traffic			X
Social impact of public transport on: Young people Elderly people People with disabilities			X
Effects on delivery of public services			X
Road safety	X		
Health benefits of active travel		X	
Local multiplier effects			X
Long-term vs construction jobs			X
Package effects			X

December 2013

Sian Berry

Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

Report to the North West Transport Roundtable (NW TAR) and the Campaign for Better Transport (CfBT): SEMMMS A6 to Manchester Airport Relief Road (A6 MARR) Planning Application

Supplementary analysis by Keith Buchan

(following on from reports submitted as part of the Consultation Process)

Statement of qualifications and experience

This report has been prepared by Keith Buchan, Director of the Metropolitan Transport Research Unit (MTRU) a position he has held since 1991. Keith has an MSc in Transport Planning and Management and is a Member of the Chartered Institution of Highways and Transportation, and the Transport Planning Society (TPS). He was elected chair of TPS in 2011 and after his term of office was complete in 2013 he has continued on the Board in the role of Director of Policy.

Before setting up MTRU he worked for local authorities, including the Greater London Council, where he became Head of Highways Policy Division. This included responsibility for the London Area Transport Model and preparing the Annual Transport Policies and Programmes. His work has included transport strategy, environmental impacts, modelling and forecasting, demand responsive transport, 'new generation' bus priority, heavy vehicle studies and both urban and rural package and challenge bids. This has involved engagement with stakeholders including individual local businesses as well as their representative bodies. His work on road pricing including a state of the art report in 1991 (revised 1994) which involved collecting and analysing information from proposals in Milan, Singapore, Cambridge, Randstad and Stockholm. Studies into road freight pricing in Europe and application in the UK were published in 1996 and work for companies involved in HGV pricing in Europe updated this study in 2011. He was a member of the EU Peer Review Group on re-viewing LHVs in 2010-2011 and is currently a peer reviewer for the European Parliament on this subject.

With MTRU he has worked for a wide range of clients in the public and private sectors including the Department for Transport (DfT), Transport for London (TfL), Manchester and West Midlands PTEs, City of Nottingham, City of Cambridge, MerseyTravel, the Campaign to Protect Rural England (CPRE) in the North West and nationally, the then Countryside Commission, English Heritage, the World Wildlife Fund (WWF), Nottingham Business partnership, Chelsfield, Westfield, and currently the South Downs National Park Authority. He has led appraisals for various urban and rural challenge bids, most recently on cycling in the South Downs National Park.

Keith was the consultant to the first green commuter plans in the UK in Nottingham in 1995 which helped to launch travel planning in the UK. In 2001 he helped set up the first TfL travel plan unit. He has undertaken travel planning work for Luton airport, BAA's UK operations and Heathrow Airport. He has also produced a series of tourism and aviation demand studies. In 2008 he completed a major project on climate change and transport which was presented both to Government and the Climate Change Committee. Principles such as the use of continuous budgeting rather than distant single targets was analysed in detail and is now widely accepted, while proposals such as the introduction of a carbon related charge for vehicles at the point of purchase have also been adopted. An update to this report is planned for 2014.

**Report to North West-Transport Activists’ Roundtable on the A6 MARR
Planning Application**

Contents

Summary and conclusions from this report	3
Conclusions from previous submissions	4
Introduction	7
Part 1: Issues outstanding from the latest response by SEMMMS’ promoters to points raised in Keith Buchan’s June Critique	8
Part 2: New Webtag advice	14
Annex:	
Map showing major redistribution of flows towards the Eastern section of A6 MARR	18

Summary and conclusions from this report

1 The assessment in the application fails to set out and test a properly constructed alternative, as required by DfT and Treasury guidance, in an Options Report. The promoters claim that the SEMMMS process, which reported in 2001, removes the obligation to do this. However, SEMMMS was an integrated package, and large parts of the package are not being implemented. In fact, when surveyed as part of the study, the public expressed a clear preference for sustainable modes over road schemes.

2 The benefits of the scheme rely on unrealistic future traffic growth causing severe congestion – 68% of the predicted time savings are in the peak hours. This is the subject of a separate report by CfBT covering national and local growth rates.

3 The model predicts that the objectives set out for A6 MARR, and for SEMMMS, of reducing congestion and increasing use of sustainable modes, are not met by this scheme. In fact, average journey lengths increase rather than decrease as a result of building the road.

4 Although many key parts of the sustainable transport options proposed in SEMMMS have not been implemented, some have. Additional public transport schemes that are planned within the lifetime of the A6 MARR are predicted by the model to fail to attract people from their cars. The proposed road scheme causes £22.26million of disbenefits to public transport users and results in switch from bus use to car.

5 The requested base year data for traffic and carbon emissions has not been supplied although it should be readily available from the model. Without it the level of achievement of carbon reduction targets cannot be assessed. It would also allow a more robust health impact assessment to be made.

Conclusions from previous submissions

Some of the issues summarised above are outstanding from previous studies undertaken for NW TAR in relation to the consultation on this scheme, and for the impact of the Manchester Airport Enterprise Zone. To provide a context, the summary conclusions from that work are set out below. They also show that some of the important information requested is still outstanding almost a year later.

Conclusions from the Critique of July 2013

- The fundamental criticism that the consultation depends upon the 2001 SEMMMS report consultation and package has not been answered.
- The evidence for change is weak and also ignores other elements in the SEMMMS package.
- The modelling and forecasting has several serious omissions in terms of relevant highway and public transport schemes, including:
 - o The impact of the full SEMMMS package, especially rail and Metrolink,
 - o New initiatives on the strategic network, including management of the M60, announced in July 2013.
 - o Other planned rail initiatives such as the Northern Hub and the Trans-Pennine electrification
- The carbon forecasts show a deterioration as a result of the scheme, and, despite requests during Phase 1, there is no base year data yet supplied to assess the proposal against carbon targets.

Conclusions from the Consultation submission of January 2013

- The modelling and forecasting context has changed radically since the SEMMMS 2001 report. It should not be relied upon for the current consultation, in particular that this scheme is the best solution to the problems of congestion, air quality and climate change.
- The modelling and forecasting published concurrently with the consultation in the Business Case is focussed on the road scheme alone and is not capable of comparing solutions across modes.
- The Business Case is not yet finalised and the material which should underpin the consultation is subject to change.
- An initial analysis of the Business Case shows serious problems, including:
 - ◇ Inconsistency between stability and decline in traffic locally, pre-dating the recession
 - ◇ Serious inaccuracies in the public transport model used to show the impact of the current road scheme including mode share and total number of trips
 - ◇ A majority of benefits accrue to longer distance traffic, not local traffic as is the stated purpose of the scheme

- ◇ No account appears to have been taken of the Northern Hub initiative and the impact this, and electrification schemes, will have on longer distance journeys
 - ◇ Unanswered questions over how the new developments have been included in the model, especially in relation to TEMPRO
 - ◇ Lack of genuine sensitivity testing, including assumptions on land use, policies including limiting parking and Smarter Choices, and a traffic stability forecast
 - ◇ Questions over whether the 'Area of Influence' is too small and fails to pick up longer distance impacts.
- For these reasons the statement that this scheme is the only solution to local problems is not accurate and has no recent evidence which supports this claim.
 - Thus the current consultation is misleading and premature.

Recommendations

- New forecasts and model runs should be undertaken to reflect the lack of traffic growth and the availability of new policy instruments since 2001.
- The consultation should be withdrawn until this work is complete.
- The work should be undertaken in a transparent manner to ensure that any future consultation is on a sound basis.

Key surface transport conclusions from the Manchester Airport Enterprise Zone Report, May 2011

SEMMMS and highway schemes

- It is interesting to note that, while the aviation and traffic forecasts were out of date almost as soon as they were completed, the SEMMMS strategic framework, which in turn has underpinned the Local Transport Plan, is still of value. In particular, the clear links it makes between levels of demand, land use planning, and parking limits, continue to be highly relevant.
- In fact, quite a number of initiatives have proceeded without the road schemes, and the core justification for them, that congestion would grow if they were not built, has faded as traffic has stabilised and fallen (not only as a result of the recession).
- The am peak journey time surveys, undertaken as part of LTP monitoring, show a 5% improvement over the last five years. This covers all modes on a sample of 15 target routes. This suggests that the deterioration in journey time in the SEMMMS analysis, itself predicated on rising levels of traffic, has not and will not occur. This in turn means that the economic benefits, based on saving time, will not occur either.
- Overall the SEMMMS highways schemes analysis has been overtaken by events including the success of many of the LTP actions in increasing the attractiveness and use of sustainable modes
- Resurrecting the scheme as part of a car intensive Enterprise Zone would undermine this success rather than supporting it. Such an approach would be against what is set out as the overall SEMMMS transport and land use strategy.

Transport to and from Manchester Airport City compared to the city region

- Mode split for passengers is dominated by car and taxi, at 87%. For staff, the modes other than car amount to about 20%, despite active attempts to make travel to work more sustainable. This is expected to improve by between 4 to 8% when the new Metrolink extension is built.
- Elsewhere in the city region mode split has been moving towards the sustainable modes of public transport, walking and cycling. In the city centre non-car travel in the AM peak is 69%. However, other centres have also made progress, the nine major centres in the city region averaging non-car travel at 48%.
- This reflects the fact that the airport is not a surface transport hub, although it may be an aviation hub and it also has a direct motorway link. However, the key rail link is radial to the city centre. Rail links from other towns and cities from all directions come into the city centre before they are able to travel to the airport. Nearby centres through which they pass, such as Stockport, have no direct rail or rapid transit links to the airport for employees.
- To be a hub the airport would have to be connected in a way that is not only multi-modal but multi-directional. This is not currently the case for public transport. For walking and cycling the key is to have people living close enough for these modes to be attractive. Airports by definition have to be some distance from populations and the impact of this is confirmed in the very low walk and cycle share of staff travel to the airport (1% and 2-3% respectively).
- No plans are set out for improving this situation, although some mention is made of the SEMMMS road link. The forecasting and modelling for this has been difficult to access except in hard copy. It is clear that it is now out of date and not be relied upon. Work is being undertaken to update this, but results are not expected until later this year.
- The overall conclusion is that travel to this site would continue to have far lower share of sustainable modes than other sites throughout the Manchester city region. There appear to be many such sites available.

Introduction

This report begins by reviewing the responses made by the SEMMMS scheme promoters to comments made on behalf of the North West Transport Roundtable (NW TAR) and the Campaign for Better Transport (CfBT) by Keith Buchan, Director of MTRU. Key issues which still are not resolved are:

- Whether the SEMMMS process from 2001 (when the final report was published) avoids the need for the options development stage which should be followed for any major transport infrastructure (following DfT and Treasury guidance)
- How far the scheme depends upon traffic growth for its justification
- Whether the traffic flow changes predicted in the model show that the SEMMMS or A6 MARR objectives have been addressed
- Whether the sustainable transport options proposed in SEMMMS have been implemented to a sufficient degree to show there is no alternative to this road scheme
- Whether the impact of the road scheme has been tested assuming a full range of effective sustainable transport improvements in future years
- Whether an estimate of base year carbon emissions should be provided to test the level of achievement of carbon reduction targets, and parallel data released which would allow a more robust health impacts assessment to be made

It explores a further issue which has arisen:

- Whether the new structure of advice on transport appraisal (Webtag as published October 2013) in relation to economics and the alternative options changes the comments previously made.

There are also a few detailed points on the modelling and forecasting which arise from the responses so far, including the Transport Economic Efficiency (TEE) Table which is used to calculate the BCR and the traffic count data.

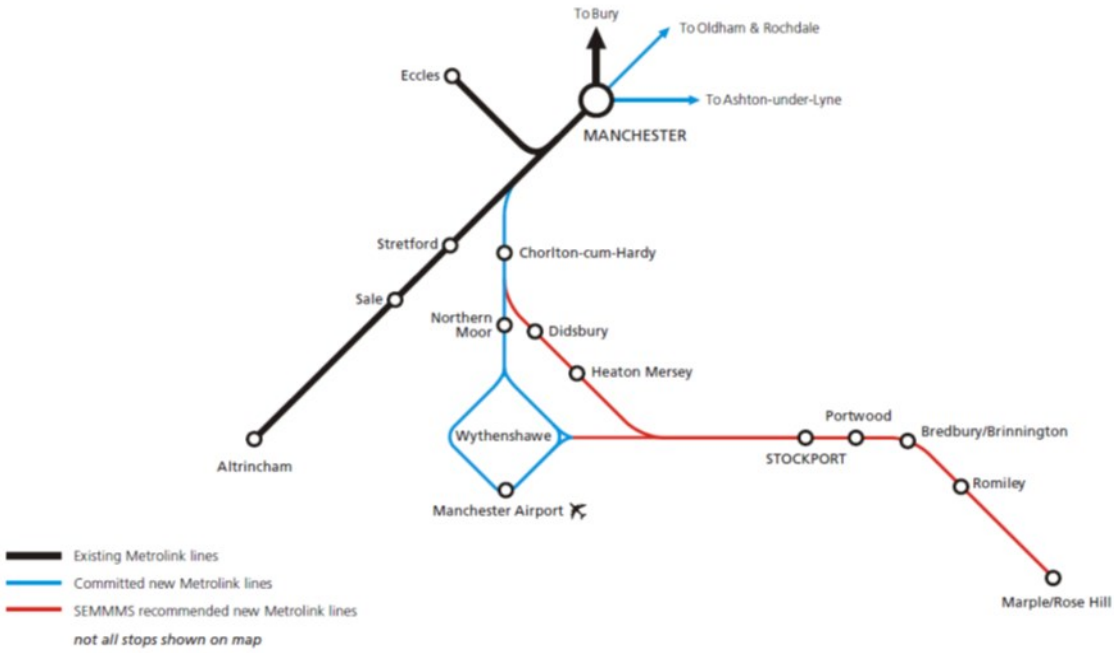
Since the original consultation the Pre-Submission Core Strategy for the Cheshire East Local Plan has been published (November 2013). This contains strongly worded policies in favour of sustainable travel, but few specific schemes targeted to this objective. A bypass for Poynton is included, both on the Highway Infrastructure Map (Figure 1.1) and in the list of schemes on page 157. This scheme is highly relevant to the impact of A6MARR as it is another of the proposed SEMMMS network of roads, but does not appear to have been tested as a stand alone option or in combination with A6 MARR.

Part 1: Issues outstanding from the latest response by SEMMMS’ promoters to points raised in Keith Buchan’s June Critique

No Options Report – is SEMMMS 2001 sufficient exploration of alternatives?

The argument surrounding this issue has been raised repeatedly in the consultation process and remains a major point of disagreement. For example, the most recent MTRU Critique in June 2013 supplied maps from SEMMMS showing highly relevant major rail/Metro schemes which are not being pursued. The two maps are reproduced below.

Figure 7.2: Metrolink



SEMMMS rail schemes



The response by the SEMMMS team admits that there are no plans to implement such schemes, and also says that other rail schemes and Metrolink *“will not have a material impact”*.

This is unsatisfactory for two reasons. First it appears to contradict their predictions that traffic flows change well away from the A6 MARR corridor. For example, one of the largest traffic decreases resulting from the new road occurs in the centre of Stockport – a highly relevant destination for SEMMMS rail/Metro schemes. Secondly the schemes in the maps do in fact quite plainly run for the most part through the same corridor as the proposed road.

There is nothing the new DfT guidance which undermines the need for alternative options to be developed, indeed it confirms the need for a specific Options Report. The new guidance is further detailed later in this report.

What growth is assumed and is this important?

An accompanying report from CfBT explores the issue of traffic growth in the area. Sufficient to say that the economic benefits adduced to the scheme are completely dependent on traffic growth causing increasing levels of congestion and public transport failing to attract people out of their cars. This is clearly shown in the flow diagram from the Transport Assessment dated October 2013, Figure 9.1, which shows some very high traffic increases from 2009 to 2017 (although some are stable).

This is also reflected in the pattern of benefits – 68% are in the peak hours where congestion is the main issue. This is clear in the 2012 Economics Report, Table 3.14 and the link back to traffic growth is clear in para 3.41:

“In the future year Do-Minimum scenarios, the level of traffic is further amplified (due to factors such as ‘background’ traffic growth and the inclusion of specific land-use /development sites), which manifests itself as increased network congestion / journey times.”

What is the impact of the redistribution of traffic and are the congestion problems “solved”

The issue of growth is linked to the question of whether there are overall benefits across the area and there is some data which has become available since the consultation submissions. There is quite a lot of argument in the SEMMMS Response to the MTRU June Critique, and some new information in the Transport Assessment (see above).

A key argument is how far the new road would ‘generate’ traffic. It is important to set out the diverse sources of traffic generation. The first is simply the placing of new development close by, whether housing or centres of employment. Some new development is included, some not. The question of how this traffic should be dealt with is important. If it is not close to public transport or at a sufficient density to attract walking and cycling, and has plenty of car parking, it will generate a lot more traffic than if it were in a more sustainable location – usually found in city centres not on the periphery.

Beyond this there are several ways in which road traffic is generated:

If car journeys are made faster and more reliable, trips may transfer from public transport (as they do in the case of A6 MARR) and will certainly tend to get longer. There is also the combination effect of switching from a short walk trip to a longer car trip. This is a very important effect but is not included in many traffic models, including this one. However, the lengthening of car trips without transfer is included.

As can be seen in the published model results, the prediction, despite being for only part of the potential traffic generation, still estimates that total traffic will increase as a result of the scheme, when one of the key aims is that it should decrease as a result of a more direct route between the A6 and Manchester Airport.

For example, the claim is made in the response that:

“This lack of a direct east-west link is self-evidently, increasing journey length and journey times, and adding to congestion leading to increased carbon emission from road transport and adversely impacting upon local communities. The proposed schemes will address these negative transport impacts.”

If this statement were true, it would be expected that one of the key benefits would be shorter journey lengths and less carbon emissions.

However, the evidence from the model does not support this claim, as is shown in Table 9.1 of the Transport Assessment. Data from this is used to produce a summary of average trip length changes, set out in Table 1 below. Average trip lengths actually increase slightly across the modelled area, as would be expected if, as well as many trips which do become shorter, other new trips are generated by the road which are longer. In this sense the over long trip problem has not been “addressed” as is implied by the SEMMMS team.

Table 1: Average trip lengths with and without A6 MARR

	Trip length without A6MARR	Trip length with A6MARR
AM Peak	9.0645	9.1341
Inter Peak	8.5559	8.6488
PM Peak	9.3934	9.4646

Source: Table 9.1 A6MARR Transport Assessment

This is not the only concern over the traffic impacts, which are set out as spot counts on selected roads in Figure 9.1 of the Transport Assessment. There is in fact an error on the map, the count point on the A34 North of new road should be marked red as a significant increase, not grey for neutral.

Returning to the flows themselves, currently the fastest route from Hazel Grove to Manchester Airport (according to satnav based route planners) is to go North and then use the M60. With the A6MARR in place, it would be expected that trips to this and similar destinations would travel South instead and use the new road. A reduction of about 6-7,000 vehicles a day is predicted for the A6 North of Hazel Grove through Stockport if the scheme is built and this appears consistent with such re-routing.

The model predicts that, with A6MARR in place, there would be a massive decrease just North of the new road on the A6 (about 15,000 fewer vehicles a day) and the A523 (about 5,000 fewer vehicles a day). This seems counter intuitive and is not balanced by the increase on the A6 to the West

- switch from one mode to another (mode transfer)
- Replace a short trip with a longer one to a similar destination, for example a more distant shopping centre,
- make a new trip entirely.

If car journeys are made faster and more reliable, trips may transfer from public transport (as they do in the case of A6 MARR) and will certainly tend to get longer. There is also the combination effect of switching from a short walk trip to a longer car trip. This is a very important effect but is not included in many traffic models, including this one. However, the lengthening of car trips without transfer is included.

As can be seen in the published model results, the prediction, despite being for only part of the potential traffic generation, still estimates that total traffic will increase as a result of the scheme, when one of the key aims is that it should decrease as a result of a more direct route between the A6 and Manchester Airport.

For example, the claim is made in the response that:

“This lack of a direct east-west link is self-evidently, increasing journey length and journey times, and adding to congestion leading to increased carbon emission from road transport and adversely impacting upon local communities. The proposed schemes will address these negative transport impacts.”

If this statement were true, it would be expected that one of the key benefits would be shorter journey lengths and less carbon emissions.

However, the evidence from the model does not support this claim, as is shown in Table 9.1 of the Transport Assessment. Data from this is used to produce a summary of average trip length changes, set out in Table 1 below. Average trip lengths actually increase slightly across the modelled area, as would be expected if, as well as many trips which do become shorter, other new trips are generated by the road which are longer. In this sense the over long trip problem has not been “addressed” as is implied by the SEMMMS team.

Table 1: Average trip lengths with and without A6MARR

	Trip length without A6MARR	Trip length with A6MARR
AM Peak	9.0645	9.1341
Inter Peak	8.5559	8.6488
PM Peak	9.3934	9.4646

Source: Table 9.1 A6MARR Transport Assessment

This is not the only concern over the traffic impacts, which are set out as spot counts on selected roads in Figure 9.1 of the Transport Assessment. There is in fact an error on the map, the count point on the A34 North of new road should be marked red as a significant increase, not grey for neutral.

Returning to the flows themselves, currently the fastest route from Hazel Grove to Manchester Airport (according to satnav based route planners) is to go North and then use the M60. With the A6MARR in place, it would be expected that trips to this and similar destinations would travel South instead and use the new road. A reduction of about 6-7,000 vehicles a day is predicted for the A6 North of Hazel Grove through Stockport if the scheme is built and this appears consistent with such re-routing.

The model predicts that, with A6 MARR in place, there would be a massive decrease just North of the new road on the A6 (about 15,000 fewer vehicles a day) and the A523 (about 5,000 fewer vehicles a day). This seems counter intuitive and is not balanced by the increase on the A6 to the West through High Lane, which is nevertheless significant at around 5-6,000 vehicles a day. This increase, on a road which runs directly into the centre of the Peak District National Park also undermines the proposers' contention that there will be little impact on the Park.

Nor is there any evidence of a reduction on the A627 to the North East of Hazel Grove or on the A626 or A627 further out. There are clearly major changes in traffic patterns predicted as a result of A6 MARR which are not transparent in the analysis and which may not support the stated objectives of the scheme. Annex 1 to this report reproduces a map showing the flows referred to above.

Such major changes in individual flows, which need to be fully explained if the true impact of the proposed scheme are to be understood, support the point made in Table 1, that overall trip lengths go up when they should have gone down.

Has sustainable transport been treated fairly in the appraisal?

There are two issues to be considered here: whether public transport schemes have been included in the model, and what is the best estimate of the impact on public transport.

The first relates to the claim made by the SEMMMS team (in response to a carbon question, but equally related to congestion) that:

"In actual fact, the assessment reported in the business case relates to the impact of the road scheme only, and then only to those elements that can be directly reflected in the traffic models. It does not include carbon benefits from any public transport schemes and excludes for example, the new cycle route that will be provided as part of the scheme."

This is of course to completely misunderstand the point. The modelling does include the impact of all the likely public transport schemes built between now and 2017 (and indeed 2032). It most certainly does include the carbon and other effects of any mode transfers between road use and public transport. This transfer is predicted to be from bus to car, not the other way round. This should have led to the conclusion that the lack of implementation of the SEMMMS package as a whole (including specific rail/Metro improvements not in the list below) was fuelling traffic growth. Whether this growth is itself realistic in the modelling is another issue and is detailed in the paper on traffic growth by CfBT.

The scheme's Uncertainty Log contains the schemes which were included in the traffic model as likely to be implemented and these are shown below.

Uncertainty Log Version 6, Page 119, Appendix D:

List of public transport schemes in the Core Scenario

Public Transport	
2017	2032
Metrolink: Chorlton to East Didsbury	Metrolink: Chorlton to East Didsbury
Metrolink: Droylsden to Ashton	Metrolink: Droylsden to Ashton
Leigh-Salford-Manchester Busway	Leigh-Salford-Manchester Busway
Airport and 2CC - Metrolink	Airport and 2CC - Metrolink
Altrincham Interchange	Altrincham Interchange
Elements of Cross City Bus Package	Elements of Cross City Bus Package

The process of defining them is also set out in the Log:

Uncertainty Log Version 6, July 2012

"1.2 Similarly, transport supply factors such as committed highway or public transport schemes are collated and categorised. The demand and supply components of the uncertainty log are then reviewed by stakeholders and agreement made for any adjustments."

As regards the lack of modelling of walk or cycle, this has been pointed out before and is a failing in the model. It must however be questionable whether this scheme will have a positive impact on walking or cycling. First the average walking distances are short and unlikely to be much affected by a new dual carriageway road. Second, the environment for walking or cycling is unlikely to be attractive – no details are given of how the larger junctions will be traversed, or the levels of noise and air pollution which non-motorised users will have to endure.

Finally there is the issue of the serious disbenefits which the model predicts for public transport.

It is clear from the evidence that the predicted outcome is a major loss both to public transport users and providers. The model claims to be multi-modal and has a Variable Demand Model (VDM) component to predict mode share. The Economics Report clearly says, in relation the faster road journey times:

"The VDM model predicts that this improvement in journey time will lead to a mode shift from bus to car." (Economics Report para 3.25)

It goes to say that this might not be realistic. However, either the VDM should be altered to make it realistic, or the results should be accepted as the best estimate. Both cannot be true at the same time.

The detailed results from the model are shown in the table below, drawn from the Economics Report, Transport Economic Efficiency (TEE) Table.

Table 2: Disbenefits to public transport users

	Public transport (all bus) £000	
Benefit type:	Travel time	All (time + other)
Commuter	-2679	-2420
Personal other	-5116	-4753
Business	118	139
Sub-total for bus users	-7677	-7034
Private sector providers (Bus revenue)		-15226
Total disbenefits to public transport		-22260

Source: *Transport Economics Report, Appendix A, Table A 1*

The Economics Report refers to this adverse result in paragraph 3.24 as follows:

“The results incorporated in the TEE Table (Appendix A), indicate a small PT disbenefit largely as a result of loss of fare box revenue due to mode shift from bus to car. The TUBA results are subject to model noise from the Highway SATURN Model and should therefore be interpreted as indicating that the PT user time impacts will be small and within the margins of error of the highway modelling.”

This certainly needs closer examination. For example, “model noise” to the tune of £22.26million is higher than the noise disbenefits (c.£17mn), than the accident benefits (c.£16mn), than the change in public sector revenue (c.£7mn), or the savings in vehicle operating costs for commuters (c.£4mn) or the disbenefits to vehicle operating costs other private car users (c.£5mn). The disbenefit to public transport may be an inconvenient result for the promoters, but it must be treated with due seriousness as a best estimate of the impact, or else the model structure must be reviewed to see where errors are occurring.

Do we know whether the scheme helps or hinders the achievement of targets for carbon or health?

In their response to the MTRU June Critique, the SEMMMS team say

“Carbon emissions data for the model base year of 2009 is not available as this is not a requirement of WebTAG or of scheme appraisal.”

This claim needs to be understood. First emissions data are easily available from standard model outputs, and since there has been a base year run, this data is readily available. It is the choice of the SEMMMS promoters not to release it. Why does this matter?

The answer is that all carbon reduction targets are set in relation to a base year, for example the Climate Change Act sets a target of an 80% reduction on 1990 levels by 2050. However, such a long term target is poorly related to planning action now. For this reason the Climate Change Committee has set four 5 year budget periods which have been accepted by Government. The final one of these is for 2023-27 and requires a 50% reduction on 1990 levels. For transport, *The Carbon Plan: Delivering our low carbon future* (December 2011) shows that transport should reduce its emissions from 137 million tonnes of CO₂ (MtCO₂) in 2009 to 116 MtCO₂ by 2030, a fall of 15%.

The SEMMMS model base year happens to be 2009 so the data for carbon would be useful for:

Testing whether this scheme is in line with transport's overall target

If it is not, which other schemes which over achieve carbon reductions are being used to compensate

Testing whether this scheme contributes to existing carbon reduction targets and those emerging, for example in relation to the Cheshire East Local Plan

If it does not, identifying which other initiatives (not just confined to transport) will enable achievement of these targets.

The increasing seriousness with which health issues, and in particular how to build in sufficient exercise to maintain health into daily life, also argues for an analysis of how far the model predicts that motorised travel will continue to dominate travel patterns, particularly outside city centres. This is in addition to the health impact of air pollution and noise. Again it is misleading to only set these in terms of predicted futures, without assessing what the impacts are in the base year.

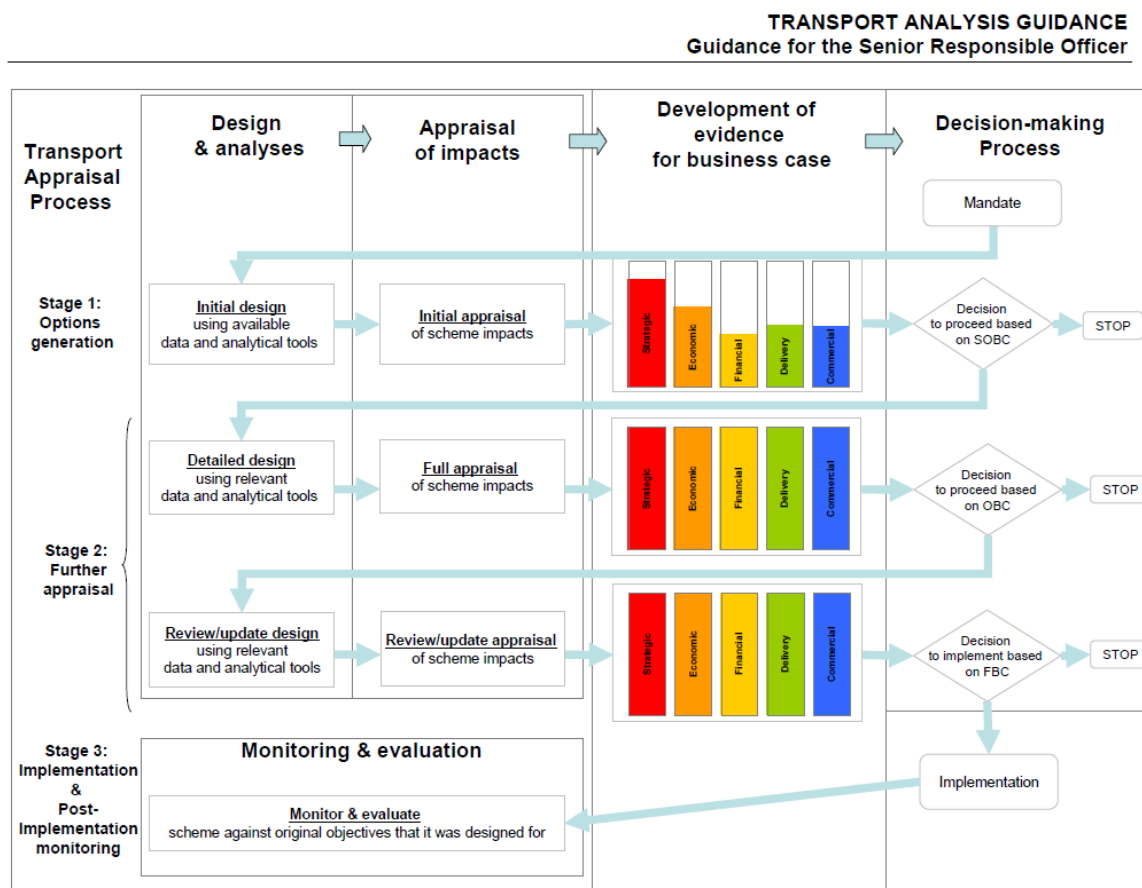
In this context, the new TEE table referred to earlier does not appear to have any noise costs, which are present in earlier documents and in the Assessment Summary Table at about £17million. These need to be added for future use and the BCR adjusted accordingly. The overall refusal to release the base year data from the modelling seriously compromises the public's ability to understand whether the scheme's impact is in line with current targets (some of which are legally binding).

Part 2: New Webtag advice

A revised and simplified version of DfT guidance on transport appraisal was published in October 2013. Earlier submissions by NW TAR were made on the basis of the earlier version, so this has been reviewed for this submission. The new guidance has two areas particularly relevant to the Business Case analysis: Options Generation and Wider Impacts, formerly Wider Economic Benefits.

Option generation

In the original submission a diagram which showed the importance of Option Generation and engagement with stakeholders was annexed. This diagram has been recast for the new guidance as follows.



The accompanying text states that:

“Stage 1 – Option development

1.2.2 Stage 1 follows after the mandate for the transport study has been established. The key focus here is to identify the problems and case for change to be addressed by the transport study. There is more detailed guidance on this in Transport Business Case. Following this, the next steps are then to develop a broad range of options to address the study objectives, and short-listing options based on assessment against the criteria set out in the 5 case model. Whilst this 5 case model approach is discussed in greater detail in the later part of this unit, it is worth mentioning at this point, that analysts need to consider the Strategic, Economic, Financial, Delivery and Commercial case even from early stages of the transport study.

1.2.3 It is also important to initiate stakeholder engagement at this stage, involving stakeholders early in options generation/development and sifting to ensure that the proposed options are fit-for-purpose, and to gather public support and acceptability for the proposed options. Hence, a stakeholder strategy will need to be established early in the study process, and should address who to involve and when."

It is clear from this that there is nothing in the revisions which undermines the original point, which was that this process had not been followed at all other than in the context of the original SEMMMS Report in 2001 (itself based on work undertaking previously). The conclusions of that report were that the solution proposed to the problems was multi-modal and should not be pursued as isolated sections without triggering a complete review of the strategy. The proposers of the current scheme rely upon SEMMMS to avoid producing an Options Report, however it is clear that major parts of the SEMMMS package are not planned for implementation. This detailed earlier in this report. Thus there should be a review of the options.

This process is set out in the new Unit on *The Transport Appraisal Process*, dated October 2013.

"1.1.5 In summary, the following key principles should be followed through the appraisal process:

There must be a clear rationale for any proposal and it must be based on a clear presentation of problems and challenges that establish the 'need' for a project.

There must be consideration of genuine, discrete options, and not an assessment of a previously selected option against some clearly inferior alternatives. A range of solutions should be considered across networks and modes.

There should be an auditable and documented process which identifies the best performing options to be taken forward for further appraisal.

There should be an appropriate level of public and stakeholder participation and engagement at suitable points in the process. In most cases this should inform the evidence-base which establishes the 'need' for an intervention, guide the option generation, sifting and assessment steps, as well as informing further appraisal in Stage 2."

The conclusion of this report is that there are key elements of the SEMMMS proposals that are not proceeding and that would alter the impacts of this scheme. Alternative options should have been developed and tested, to comply with DfT and Treasury guidance.

Wider Impacts

The transport appraisal process has been the subject of considerable discussion on two important issues which are relevant to this scheme. The first is the issue of whether the value of time savings are proportional to their size and direction (very small savings are unusable, time losses have a much higher impact than gains). The second is whether there are any economic benefits beyond the time savings usually predicted.

The issue of time savings has been covered by Alan Wenban Smith in his analysis for NW TAR in January 2013 and his conclusion was that the benefits of this scheme were extremely sensitive to these two effects, sufficient to remove most of the predicted benefits. These conclusions remain valid. His report also covered the issue of “wider economic benefits” and the DfT guidance on this has been re-issued since his report as TAG Unit 2.1. This is completely compatible with the original NW TAR/CfBT report, although the fact that impacts can be negative as well as positive is recognised, including renaming the Unit “Wider Impacts”. While the Unit is clear, there has been some confusion about how to deal with this in transport appraisal. The Unit lists the following impacts:

“1.1.4 The types of Wider Impacts that need to be considered in transport appraisals are:
·WI1 – Agglomeration
·WI2– Output change in imperfectly competitive markets
·WI3 – Tax revenues arising from labour market impacts (from labour supply impacts and from moves to more or less productive jobs)”

Items one and two are essentially causing improvements in labour productivity.

Practitioners also appear to have confused the issue of the creation of new jobs in the UK economy and the relocation of jobs, which does not lead to overall national GDP growth (and may result in time disbenefits where they are relocated and economic disbenefits where they are not created).

If it there is to be a claim that the SEMMMS proposal will create improved labour productivity this needs to be analysed in its own right in a separate report.

In the original Appendix N to the Business Case for this scheme figures are given for jobs but very little detail as to whether these are additional or relocated. If this scheme results in increased employment from either source this needs to be added to the trips in the model over and above that used for the Do Minimum. This would allow a realistic measure of the congestion costs to be calculated, not the broad brush estimate in Appendix N. Given that the scheme is justified on the basis of relieving congestion, the relocation of jobs is critical.

In fact, creation of new jobs through labour productivity is not a necessary outcome, for example it may be used to increase profits and withdrawn from the local economy. The relocation of jobs is easier to understand and if there is a claim that jobs will increase locally as a result of the scheme, these trips must also be added to the DM trips locally, and subtracted from the trip matrices somewhere else. In practice this is extremely difficult and subject to high levels of uncertainty, although in this case there are very clear regional level risks in making one sub-regional area more attractive than another, and in making a peripheral location more attractive than the centre.

Despite this, as Alan Wenban Smith pointed out in his January report for NW TAR, there is no land use and transport model being used which would help to show which areas would gain and which would lose, and how this would affect the time savings. It is important to note that the benefits from transport agglomeration (basically putting more people and businesses within a certain time distance of each other) can also occur through the opposite – one area within or adjacent to a functioning urban region (FUR) becomes more attractive and reduces the number of businesses in another. This is particularly the case in terms of orbital road networks, because public transport is traditionally strongest for radial journeys to the established centre.

Put simply, making it easy to drive to a peripheral location will encourage businesses to locate there and employees will find it easier to drive to work than take public transport to the centre. There is nothing in the new guidance which undermines the economic analysis submitted as part of the consultation.

SEMMMS A6 Manchester Airport Relief Road: Air quality and climate change implications

A response to the planning application by Friends of the Earth England, Wales & Northern Ireland

Introduction

Since the original South East Manchester Multi Modal Study (SEMMMS) study which was completed in 2001, there has been no full up-to-date review of the need for the A6 to Manchester Airport Relief Road (A6 MARR) against other non-road building options to address congestion problems, despite a national flattening out in traffic growth, ¹ changes to travel patterns, new legislation on air quality and climate change, and new evidence emerging to drive policy decisions, for example on the urgency for action on climate change.

The planning application is being presented in isolation from other major infrastructure development that would add to cumulative emissions, air pollution and climate change – including the wider network of SEMMMS roads, Manchester Airport City Enterprise Zone, plans for Woodford Garden Village on land at the former Woodford Aerodrome site south of the A6-MARR and plans for a major new settlement east of Handforth at the junction of the A555 and the A34. The three local authorities are therefore unable to form a holistic view of the overall cumulative climate change and air quality impacts from linked planned development – and, importantly, to adjust plans accordingly in line with legal air quality and climate change targets.

Air quality issues and evidence

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 ². Road transport is a major source of air pollution, and is estimated to be responsible for £5 - £11 billion per annum of the wider costs of transport in urban areas ³.

The European Commission has declared 2013 as the 'Year of Air', with new proposals on improving air quality across Europe to be developed this year. The EC cites emissions from traffic on roads as one of the key contributors to air pollution, which in turn 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 EU every year ⁴.

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 ⁵.

The World Health Organisation's specialised cancer agency has 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' ⁶.

¹ Department for Transport road traffic statistics 2012, table TRA5102

<https://www.gov.uk/government/organisations/departement-for-transport/series/road-traffic-statistics>

² UK Air Quality Strategy, 2007 www.defra.gov.uk/environment/airquality/strategy/index.htm

³ Air pollution: Action in a Changing Climate, 2010 <http://www.defra.gov.uk/publications/2011/04/13/pb13378-air-pollution/>

⁴ http://ec.europa.eu/research/infocentre/article_en.cfm?id=research/headlines/news/article_13_01_16_en.html&item=Infocentre&artid=28973

⁵ <http://www.who.int/mediacentre/factsheets/fs313/en/index.html>

⁶ http://www.iarc.fr/en/media-centre/iarcnews/pdf/pr221_E.pdf

Air quality legal and policy context

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 PM2.5) and nitrogen dioxide (NO2) ⁷. The 2008 Directive was transposed into English law through the Air Quality Standards Regulations 2010 and the Government's National Air Quality Strategy.

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.

The EU Directive 2008/50/EC stipulates that compliance with the NO2 limit values should have been achieved by 01/01/2010, but allowed Member States to postpone this attainment date until 01/01/2015 provided air quality plans are established demonstrating how the limit values will be met by this extended deadline.

In a recent Supreme Court ruling, the Government was found to be in breach of article 13 of the EU Air Quality Directive ⁸. 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.

Clean Air London has recently lodged a complaint with the European Commission under the Directive 2008/50/EC regarding removal of the M4 bus corridor despite it causing aggravated, unmitigated and ongoing breaches of the annual NO2 limit value ⁹. The Directive stipulates that limit values must be applied everywhere in a zone where the public has access, and does not allow for a balancing of improvement and worsening.

The Highways Agency has 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 Swinton and Sale would breach UK and EU standards protecting public health and the natural environment.

In their consultation report ¹⁰, 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."

⁷ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:152:0001:0044:EN:PDF>

⁸ http://www.supremecourt.gov.uk/decided-cases/docs/UKSC_2012_0179_Judgment.pdf

⁹ <http://cleanairinlondon.org/legal/government-treats-limit-values-with-contempt-by-m4-bus-lane/>

¹⁰ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/255525/M60_J8_-_M62_J20_MMM_Consultation_Document_SI_November_final_061113_1030_doc__attachment_.pdf

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)

The Greater Manchester Local Transport Plan 3 (LTP3) acknowledges that the 2010 requirements for NO₂ concentrations have not been met, but does not set out how transport planning decisions will enable the 2015 deadline to be met ¹¹. Despite the focus on meeting EU limits on NO₂, the Greater Manchester Air Quality Strategy and Action Plan ¹² ‘made very little difference’ (LTP3 section 9.3) to NO₂ concentration at most road side locations.

The National Planning Policy Framework states in relation to air quality:

Para 109. *“The planning system should contribute to and enhance the natural and local environment by:* *- preventing both new and existing development from contributing to or put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability;”*

Greater Manchester health inequalities

It is 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) ¹³”

The latest Public Health Outcomes Framework Indicator, Figure 3.01 for Fraction of all-cause adult mortality attributable to long-term exposure to current levels of anthropogenic particulate air pollution for the three authorities within the scheme boundary are Manchester 5.4%, Stockport 5.2% and Cheshire East 4.5% ¹⁴ It is recognised that South Manchester and Wythenshawe have higher 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 ¹⁵”

¹¹ http://www.tfgm.com/journey_planning/LTP3/Documents/Greater_Manchester_Local_Transport_Plan_Core_Strategy.pdf

¹² http://www.tfgm.com/journey_planning/LTP3/Documents/Air-Quality-Strategy-and-Action-Plan.pdf

¹³ NHS Manchester PNA Consultation, September 2010. http://www.manchester.nhs.uk/document_uploads/PNA/PNA%20Framework%20section3.pdf

¹⁴ <http://www.phoutcomes.info/public-health-outcomes-framework#qid/1000043/pat/6/ati/102/page/3/par/E12000002/are/E06000049>

¹⁵ NHS Manchester PNA Consultation September 2010. http://www.manchester.nhs.uk/document_uploads/PNA/PNA%20Framework%20section3.pdf

AQMAs affected by the A6 MARR

An AQMA has been declared for Greater Manchester, parts of which overlap with the A6 MARR scheme. Twelve AQMAs have been declared in Cheshire East including in Disley, to the south east of the A6 MARR. Comment on the implications of the scheme on these AQMAs is contained in the next section.

The UK Air Pollution report 2011 found that annual mean concentrations of NO₂ beside busy urban roads frequently exceed 40 µg m⁻³, the limit value set by the European Union to protect human health. The report showed that the Greater Manchester agglomeration had locations with measured or modelled mean NO₂ concentrations higher than the 40 µg mean limit ¹⁶.

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 of up to £300 million ¹⁷. The LTP3 acknowledges that 'financial penalties may have a significant impact on future budgets' yet this financial and legal risk has not been taken into account in the Business Case nor Planning Statement.

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 ¹⁸. Ozone is a harmful air pollutant and potent greenhouse gas, which can be transported large distances by weather.

The Greater Manchester LTP 3 Air Quality Strategy and Action Plan states that detailed assessment and air quality modelling is being carried out by the Greater Manchester Transportation Unit through the Greater Manchester Emissions Dispersion project (Para 2.4) to provide a forecast for emissions for 2015/16, yet this is not referred to in the Environment Statement ¹⁹.

Air quality impacts of scheme

The Planning Statement has summarised air quality impacts as:

"7.2.13 The EIA has demonstrated that Nitrogen Dioxide (NO₂) concentrations will fall at approximately 79% of receptors whilst 2% will be unchanged and **19% will experience an increase**. Particulate Matter (PM₁₀) concentrations are predicted to fall at approximately 61% of receptors whilst 22% will be unchanged and **17% will experience an increase**.

7.2.14 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." (emphasis added)

¹⁶ http://uk-air.defra.gov.uk/library/annualreport/air_pollution_uk_2011_issue_2.pdf

¹⁷ <http://www.guardian.co.uk/environment/2010/jun/03/uk-warning-london-air-quality>

¹⁸ http://uk-air.defra.gov.uk/library/annualreport/air_pollution_uk_2011_issue_2.pdf

¹⁹ http://www.tfgm.com/journey_planning/LTP3/Documents/Air-Quality-Strategy-and-Action-Plan.pdf

The map of impacts of the scheme on annual mean NO₂ concentrations shows a 'slight adverse' effect in the Disley AQMA on annual mean NO₂ concentrations and in the Greater Manchester AQMA south of Hazel Grove on the A6.

The traffic assessment identifies traffic increases in Wythenshawe (south of Simonsway) to the north of the A6 MARR, and Handforth, High Lane and Disley to the south of the A6 MARR (9.10). It also outlines an increase in traffic on certain routes: the A6 between High Lane and Disley; the A34 between the A555 and Dean Row Road; A555 between the B5358 (at Handforth) and A5102 (at Woodford/Bramhall); and M56 between junctions 5 and 7²¹. Figure 9.1 shows significant increases of over 5% in annual average daily traffic flow at points in Wythenshawe, Handforth, Poynton, Hazel Grove, High Lane, Disley and Newtown for 2017 with the A6 MARR than without.

With proposed mitigation Figure 9.3 and Table 9.3 show that significant traffic increases of between 25-30% continue to be expected on the A6 through High Lane and Disley; mitigation in Wythenshawe may lead to increased traffic flows on Simonsway; and mitigation on Gillbent Road may lead to increased traffic on the A34 north of the A34/B5094. Figure 9.3 shows significant increases of traffic flow of more than 5% with mitigation continue to be shown for parts of Wythenshawe, Handforth, Poynton, High Lane, Disley and Newtown.

Table 8-12 in the Environmental Statement shows annual exceedances for NO₂ of >40 µg m⁻³ within AQMAs. The 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. In their response to the NW TAR consultation response of January 2013, the project team failed to address the legal implications of adding to exceedances of NO₂ levels in areas where pollution levels already breach EU standards.

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. 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.

²⁰ <http://www.semmms.info/140683/435117/639723/airquality>

²¹ <http://a6marr.stockport.gov.uk/746597/760095/760276>

²² <http://a6marr.stockport.gov.uk/746597/760095/760276>

Goodwin, P. Empirical evidence on induced traffic; Transportation Vol 23 Issue 1 1996; SACTRA report 1994, Trunk 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>

Climate Change issues and evidence

The latest Intergovernmental Panel on Climate Change Fifth Assessment Report was published in September 2013 ²³. 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 ²⁴ included the following excerpts:

“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.”

Climate change has led to changes in climate extremes such as heat waves, record high temperatures and, in many regions, heavy precipitation in the past half century ²⁵. It is clear that bold action to radically reduce greenhouse gas emissions is urgently required, not business as usual.

In its latest annual progress report, the Committee on Climate Change, the government’s independent advisors and statutory body reporting to Parliament on greenhouse gas emission reductions, found that the pace of measures needed to reduce emissions in the UK needs to increase fourfold to meet legal targets ²⁶.

Climate change legal and policy context

The Climate Change Act 2008 introduced a binding reduction target requiring the UK to reduce its emissions by at least 80% by 2050 against 1990 levels and a reduction of at least 34% by 2020 ²⁷. It also introduced a long-term framework for managing emissions through a system of national carbon budgets, which place caps on the total quantity of greenhouse gases permitted in the UK over a specified time.

²³ http://www.climatechange2013.org/images/uploads/WGIAR5_WGI-12Doc2b_FinalDraft_All.pdf

²⁴ http://www.ipcc.ch/news_and_events/docs/ar5/ar5_wg1_headlines.pdf

²⁵ http://www.ipcc.ch/news_and_events/docs/srex/srex_press_release.pdf

²⁶ http://hmccc.s3.amazonaws.com/2012%20Progress/CCC_Progress%20Rep%202012_bookmarked_singles_1.p

Df

²⁷ <http://www.legislation.gov.uk/ukpga/2008/27/contents>

The Government 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 ²⁸. The 2023-27 carbon budget requires a 50% reduction on 1990 levels.

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 Carbon Plan shows that the transport sector should reduce its emissions from 137 million tonnes of CO₂ (MtCO₂) in 2009 to 116 MtCO₂ by 2030, a fall of 15%. The Plan sets out that sustainable travel choices are a key element of the Government's strategy for de-carbonising travel. A report by the Committee on Climate Change in 2012 concluded that local government is key to meeting national greenhouse gas emission targets, and the sector has the potential to significantly impact on the UK's scale and speed of emissions reductions. It highlighted the influence local authorities have over key emitting sectors including surface transport, and the importance of designing and implement local sustainable transport plans, enhancing public transport and promoting sustainable travel, and land-use planning that delivers sustainable patterns of development.

At the regional level, the North West Climate Action Plan and refresh set out a vision for a low carbon and well adapted region by 2020 ²⁹. The action plan sets out that 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 sub-regional level, the Greater Manchester Climate Strategy was launched in July 2011, setting out a plan to build a low carbon economy by 2020 and reduce collective carbon emissions by 48%. The 'Mini-Stern' for Manchester found that inaction on climate change could cost the Greater Manchester economy £20 billion by 2020 ³¹.

National and local planning policy

The National Planning Policy Framework states that:

Para 30 *"Encouragement should be given to solutions which support **reductions in greenhouse gas emissions** and reduce congestion."*

Para 93 *"Planning plays a key role in helping shape places to secure **radical reductions in greenhouse gas emissions**, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development."* ³² (emphasis added)

²⁸ <http://www.decc.gov.uk/assets/decc/11/tackling-climate-change/carbon-plan/3702-the-carbon-plan-delivering-our-low-carbon-future.pdf>

²⁹ http://www.grabs-eu.org/membersArea/files/NW_England.pdf and North West Climate Change Plan, 2006 http://www.4nw.org.uk/downloads/documents/nov_06/nwra_1163093027_North_West_Climate_Change_Acti.pdf

³⁰ http://www.manchester.gov.uk/info/500117/green_city/3833/climate_change_and_energy/1

³¹ http://www.deloitte.com/assets/Dcom-UnitedKingdom/Local%20Assets/Documents/UK_GPS_MiniStern.pdf

³² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

The Manchester Local Plan Core Strategy contains a target for reduction in carbon emissions by 41% from 2005 levels by 2020, and the following Spatial Objectives:

"SO1. Spatial Principles

Provide a framework within which the sustainable development of the City can contribute to halting climate change".

"SO6. Environment

Protect and enhance both the natural and built environment of the City and ensure the sustainable use of natural resources, in order to mitigate and adapt to climate change, support biodiversity and wildlife, improve air, water and land quality, recreational opportunities and provide networks of high quality green infrastructure, ensuring that the City is inclusive and attractive to residents, workers, investors and visitors."

The Stockport Core Strategy contains the following:

"Objective 1 Sustainable Development: Addressing inequalities and climate change

The Core Strategy will support, enable and encourage development that is environmentally, socially and economically sustainable so as to address the key issues of climate change and inequalities. It will achieve this by d. Actively requiring development to contribute to a reduction in the Borough's carbon footprint"

The emerging Cheshire East Local Plan (Pre-submission core strategy draft) includes:

"Policy SD1 Sustainable Development in Cheshire East ... to use appropriate technologies to reduce carbon emissions and create a low carbon economy"

"Policy CO Sustainable Travel and Transport 'To deliver a safe, 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 the Council will expect development to: Reduce the need to travel..."

The Vision for Cheshire East in 2030 is:

"Cheshire East will have made a significant contribution to reducing carbon emissions and tackling climate change through the high energy efficiency of new and existing buildings; generation of renewable energy; and sustainable patterns of development that enable a high proportion of people to travel by public transport, cycle or on foot."

Climate change impacts of scheme

Overall additional CO₂ emissions of the scheme are predicted to be 11,586 tonnes (table 8-22). In the context of the UK's legal commitment to reduce greenhouse gases by at least 80% by 2050, in line with climate science, **an increase of 11,586 tonnes of carbon dioxide** deposited into the atmosphere for the opening year of 2017 is an extremely negative outcome in terms of climate change impacts.

We strongly reject the assertion in the Business Case that the scheme has a 'neutral impact on greenhouse gas emissions'³³. The scheme clearly fails one of its key objectives to 'support lower carbon travel' (Planning Statement 1.3.1). The NWTAR January 2013 consultation submission highlighted the unacceptability of an increase in carbon dioxide (in the context of the radical reductions needed) and a failure to meet a key objective, yet the response from the project team merely repeats sections of the Business Case rather than addressing this fundamental problem of the scheme.

The conclusion to the Planning Statement claims (5.2.33) that the scheme 'will help to promote sustainable travel, which would contribute towards cutting greenhouse gas emissions through reducing dependence on the private car' which in light of the increased traffic flows predicted, induced traffic not included, and absolute increase in carbon emissions is entirely illogical.

Lack of consideration of alternative options

Carbon reduction has been cited as one of the objectives of the scheme, and with an additional 11,586 tonnes it clearly fails to meet that, and in fact makes it worse. It is unacceptable that alternative options including a public transport improvement and cycling and pedestrian infrastructure only option, without the A6 MARR, have not been considered.

The planning application for the A6 MARR has been presented in isolation from other linked planned major infrastructure schemes and therefore cumulative emissions have not been forecast and considered. 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 above, 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. This raises the question of whether such 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.

33 <http://www.semmms.info/140683/638805/a6tomanchesterairportmsbc> p.15

Measures aimed at promoting sustainable travel modes would contribute to both climate change and air quality objectives, and tackle congestion. Defra's 2010 document, Air Pollution: Action in a Changing Climate, sets out the need to align air quality and climate change strategies in order to identify options with the highest economic returns.

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 nowhere is this backed up by evidence, 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.

Reasons for refusal

The proposed road scheme conflicts with national (NPPF) and local policies and targets on air quality and climate change.

The road will increase air pollution in a number of residential areas across the scheme's area, and significantly in the Greater Manchester and Disley AQMA where pollution levels already exceed NO2 limits. A precedent has been set by the Highways Agency decision to not proceed with hard shoulder running on the M60 on air pollution grounds, and the Supreme Court ruling that the UK is in breach of the Air Quality Directive. Were the scheme to go ahead this would open up the UK to the risk of infringement action.

The IPCC Fifth Assessment issued a stark warning on the urgency and scale of action required to reduce carbon emissions and avoid dangerous climate change. Rather than contributing towards an 80% reduction in carbon dioxide emissions by 2050, the scheme is forecast to deliver an increase in emissions.

On the above grounds, and because alternative non-road options have not been considered, the planning application must be refused.

Helen Rimmer, North West Friends of the Earth Campaigner

December 2013

³⁴ <http://www.defra.gov.uk/publications/2011/04/13/pb13378-air-pollution/>

³⁵ Department for Transport, 2010, Cycling Demonstration Towns Development of Benefit-Cost Ratios

A6 to Manchester Airport Relief Road

HEALTH IMPACT ASSESSMENT CRITIQUE by David Butler and Anon

The Health Impact Assessment for the A6 to Manchester Airport Relief Road (A6 MARR) was produced by the Institute of Occupational Medicine (IOM), described as “a major independent centre of scientific excellence in the fields of occupational, environmental and public health, hygiene and safety”, and specifically by the Centre for Health Impact Assessment (IOM CHIA). IOM was originally part of Edinburgh University, funded through the coal industry. It has charitable status, and now employs around 140 staff.

Section 1

Outlines the scheme and the SEMMMS context.

Section 2 & 3

Explains what a HIA is, and the approach that this study adopts. The definition it sets out is the generally accepted one, with the key elements being to judge the impact on health, and the making of recommendations to enhance positive impacts and mitigate negative impacts. The report uses the World Health Organisation’s (WHO) model of health, encompassing both bio-medical and social aspects.

The authors see this as an “intermediate level, in depth HIA” – ie “detailed desktop analyses with some focused stakeholder consultation or feedback, e.g. stakeholder workshops and interviews that take weeks and months to carry out”.

Other impact assessments, particularly the Environment Assessment, inform it, along with feedback from the more general consultations that have taken place. They also carried out three specific HIA workshops.

The report describes three impact zones – 200m either side of the road, 1km either side, and the administrative boundaries of Manchester, Stockport & Cheshire East.

It sets out the main health determinants that might result from the project: non infectious/ chronic diseases (including effects of air, water, soil, noise pollution), physical injury (accidents), mental health, employment, housing, transport, social capital, leisure & recreation, lifestyle (including physical activity), and land and spatial effects.

The authors acknowledge two major limitations: the use of ward level data as a surrogate for “areas 200m either side of road”, and the inevitability of the “complexity of impacts being lost in assessment of positive/negative impact at general population level”.

Regarding page 18, para. 2.49. In describing the HIA it refers to the follow up which can involve a detailed Health Management Plan. However, no Health Management Plan has been produced.

Page 12, para3.12.1, acknowledges the limitations of HIA using ward data but states:

“some impacts on sensitive sites have been considered eg Queensgate Primary School”

It is unclear what other sensitive establishments have been considered and there is no definition of what is determined to be sensitive.

Para. 3.12.2 boldly states that the identified limitations have not affected the overall accuracy of the HIA.

Section 4

Describes the scheme, and the predicted traffic flows in 2017 and 2032. It sets (4.12) out the traffic mitigation measures, including traffic management during the construction period, and after the road is built.

Para. 4.1.2 identifies the fact that there will be four new rail crossings if the scheme goes ahead but not whether or not there would be any disruption to rail commuters during the construction.

Para. 4.8.1states:

“Lighting will be provided at new and existing junctions”

It is worth noting here that Cheshire East Council (CEC) recently had to switch lights back on over a stretch of road due to protests from a cyclist group. Whilst NW TAR does not endorse light pollution it recognises the need for safety. It is to be hoped/ assumed that junctions would be properly lit.

Para. 4.12.2 states:

“SMBC, CEC and DCC have committed to working together to develop [a] modal shift strategy for A6 to Derbyshire...”

This is hardly a definitive commitment.

Para. 4.12.6 refers to predicted increases in traffic in Handforth Centre which, the report claims, are to be mitigated by local traffic management measures. This is another non-specific statement. NW TAR envisage the effects of any mitigation being undermined by Cheshire East's major development proposals for a new settlement to the east of Handforth on Green Belt.

Section 5

Sets out the policy context:

National (Carbon plan, Air Quality strategy, Sustainable Local Transport, Active Travel Strategy, Noise policy, etc)

Local (GM LTP3, Cheshire E LTP).

Section 6

...is the 'health and wellbeing profile' which provides the population baseline for the assessment. It covers all the available public data, concentrating particularly on Census information. It is very detailed, and illustrates the fact that the areas immediately affected by the scheme are fairly affluent, with the exception of Woodhouse Park in Manchester, and the area of social housing in Handforth. Generally there are low levels of deprivation, high levels of owner occupation, and high car ownership. The 2011 census journey to work figures are revealing: in Cheshire East the mode of travel to work was 50% by car, 6% on foot, 1% by bus, 1% by cycle. The equivalent Stockport figures are: 49%, 5%, 1% and 1%.

A lot of this section appears to be 'padding' and seems to be relatively irrelevant.

The modal share of journeys to work is worth highlighting in the seven Stockport wards as this identifies the need for implementation of a true multi modal strategy.

The following figures appear: 49% travel by car, 5% foot, 7% Public transport, 1% by car. The remaining figures that would make up 100% are missing.

Para. 6.18 states:

"A large proportion of the land is designated as greenbelt".

This is the case at present but, if the road were to go ahead, along with all the development proposals along it, this narrow area of Green Belt between Greater Manchester and Cheshire East could easily disappear.

Section 7

This examines the kinds of impact that road schemes can have on health. It considers:

Outcomes: mental health, chronic diseases, injury & death.

Determinants: access to services, amenities, jobs; social exclusion; physical activity; accidents, air and noise pollution, inequality.

It is a good summary of possible impacts, and some of the points make interesting reading, for example 7.2.2 on the economic impact of roads. There is quite a comprehensive statement of the benefits of cycling and walking, and it quotes (7.2.5.9) studies showing a cost benefit ratio for cycling/walking infrastructure of 19:1. It looks at the noise impact of roads, and at accident rates on different types of roads (lower on dual carriageways). It acknowledges that traffic is now the leading source of air pollution (7.2.7.2), but notes that improving traffic flow (which is one of the alleged benefits of the scheme) decreases air pollution. The benefits/ disbenefits depend on specific location.

Paragraph 7.3.1.3 claims:

“An out-of-town bypass may therefore reduce severance, levels of air pollution and noise for residents on existing roads while increasing them for those living near the bypass. A bypass can also increase accessibility to services and amenities for many people.”

The report also addresses other road related HIAs (para. 7.5). All have both positive and negative health impacts. They all offer better access to services, amenities and jobs, with attendant health benefits. Their impact on active travel depends on the quality and range of safe crossing places, pedestrian and cycle paths in the scheme. There are benefits and disbenefits relating to air and noise pollution, accidents, and local social interaction.

Para.7.2.2.5 generally sets out the economic benefits of road building, ie.

“unlocking inaccessible sites for development”.

In the case of this particular, it has to be said that the road scheme would assist Cheshire East’s controversial house building proposals.

Section 8

Community views.

Key comments from the consultation were about increases in traffic generated by the road and increases on residential roads, and increases in air and noise pollution but the claims that:

“All comments have been considered by the design team, and mitigation measures designed where possible”.

“All comments have been considered by the design team, and mitigation measures designed where possible”.

It would have been helpful to include the specific questions asked in the Phase 1 and 2 community consultations in this section in order to be able to make informed comment/critique of the conclusions.

Para. 8.1.2 refers to the three HIA workshops but fails to provide proper reports about them or explain how invitees to the workshops were identified. In point of fact, just three stakeholders, including NW TAR and Friends of the Earth, attended the Stockport one (which was poorly promoted) and no one at all, apparently, attended the Wythenshawe event.

Section 9

This covers the health impacts of the A6 MARR, which is the key section of the report.

The report looks at four geographical areas: the existing/realigned A6, the proposed new eastern section of the new road, the existing A555 and the proposed new western section leading into the airport. It says that the key facts include the increase in traffic on the A555 and increased noise and air pollution for some residents and it refers to: “complex patterns – see environmental statement”

Construction Phase

Para. 4.13, page 41, refers to a 104 week construction phase also to a 39 week environmental mitigation phase but it is unclear if this is alongside the 104 week construction phase.

Para. 9.2.3, however, states that the construction phase will be 18 months long. This raises the obvious question – would the construction phase be 18 months or 2 years? Both seem to be optimistic.

Para. 9.2.4 explains that the construction would be phased.

Para. 9.210 flags up likely impacts on St James, Little Acorns Nursery and Queensgate with 50m of the boundary, the Royal School for the Deaf and one nursery (not identified) between 50 and 250 m of the boundary.

“

Air pollution

Para. 9.3.8 admits that there are areas in Greater Manchester and Cheshire East with pollution levels of NO₂ that exceed health guideline limit of 40ug/m³. However, it maintains that there are no areas where PM10s exceed that limit. The air quality modelling in the Environmental Statement estimates that there are 11,036 potentially sensitive “receptors” (houses, schools, hospitals, care homes, community facilities, etc.) within 200m of the A6 MARR and affected links

Areas where levels of NO₂ will increase because of the scheme: in those areas with levels above 40 ug, 209 “receptors” have NO₂ increases of 4+, another 407 increase by 2-4, and 1540 by 0-2. **In the GM AQMA 39 receptors increase by 4+, 42 by 2-4 and 292 by 0-2** (our emphasis)

Areas where levels of NO₂ decrease: the number of receptors in areas exceeding 40 ug/m³ decreases from 4566 to 3722

Para. 9.3.8.3 estimates:

“Overall, 2,156 receptors will experience an increase in NO₂ , 193 will experience no change and 8,687 will experience a decrease”

PM10s increases at 1,918 receptors, and decrease at 6,700. No areas currently exceed 40ug/m³, but one receptor is likely to experience an increase of more than 4 µg/m³; three receptors are likely to experience an increase of between 2-4 µg/m³; and 1,914 receptors are likely to experience an increase of between 0-2 µg/m³.

Air Quality

Para. 9.3.8.1 contains a difficult-to-follow claim, that Queensgate primary school would have a predicted significant increase in air pollution but would still be within limits. Three receptors in Disley AQMA would exceed health limits. The data presented suggests an overall fall in pollution levels with more receptors showing a decrease than increase

Traffic noise:

Of 26,064 potentially sensitive receptors about 18,600 experience increases (half of them over 1db) and 6,527 decreases.

Construction phase impacts such as dust, noise, etc are recognised and given an assessment of - "minor negative health impacts. This is counteracted with the claim that there would be new jobs.

The effects would be highly localised. The mix of positive/negative impacts vary by location, with most areas experiencing both.

Key positive impacts:

A key economic potential cited is the economic and employment potential along with accessibility and connectivity and the report highlights:

"The reductions in traffic flows, congestion, noise, air pollution and visual intrusion and likely increased social capital/community cohesion in some residential areas."

However, NW TAR would refer here to the analysis of the business case that was carried out by Alan Wenban-Smith for the first A6 MAA consultation which is downloadable from the 'consultations' page of the NW TAR website. This raised many doubts about the robustness of that case.

Key negatives: (9.13.16)

This covers loss of land and more on traffic and pollution aspects (for those residents close to road).

Positive/negative effects depend on opportunities for local people to benefit from construction, how construction is managed, diversion plans, maintenance of public transport, maintaining accessibility to services.

Para. 9.6.2.1 states:

"Journey time and journey ambience are likely to improve for children taken to school by car, those who use improved cycle and footpaths to get to school. The improved cycle and foot path network is likely to increase leisure time physical activity and potential walking cycling to schools. There is likely to be an overall decrease in road traffic incidents".

The evidence to support this does not appear in the HIA.

Para. 9.0 tackles health impacts on people on low income/unemployed people. Para. 9.10 claims the road would make it easier for unemployed people with access to a car or van to get to employment and education opportunities. Of course, it needs to be borne in mind that low income /unemployed people are the ones least likely to own a car.

Para. 9.10.2 maintains:

“Provided that there is a policy in place that local residents near the route and Stockport, Cheshire East and Manchester residents are targeted first..... A6 MARR will likely have a positive impact on the health and wellbeing of local people who are on low incomes/unemployed”

This claim is somewhat disingenuous. In Stockport and in Cheshire East, most residents near the route are from more affluent parts of the boroughs. In the absence of viable public transport improvements to the airport from the disadvantaged areas of Stockport, it is difficult to see how this will benefit the disadvantaged areas in the long term. The greatest benefit is clearly to car users.

Para. 9.11.1 says that the traffic modelling has taken into account the 750 to 850 homes proposed for the former BAe site at Woodford and also Airport City. And it boldly claims that, relatively speaking, there would only be small potential impacts from the numbers of additional vehicles generated by the proposed Handforth East settlement. (The new village would comprise 1,800 homes within the period of this Local Plan, plus other development, and more later) and their potential impacts are likely to be small. This is hardly an objective/quantitative statement.

Similarly, para. 9.11.2 claims that the level of land to be taken from existing green and open spaces is relatively small but fails to explain by what criteria it is being judged.

Regarding para. 9.12.1 and what it has to say on the inequality issue, we would maintain that whether or not the scheme has any positive impacts on health inequalities should be a key issues.

Para. 9.12.2 maintains that the A6 MARR could make it easier to get to other shops and services further away, although it does not attempt to quantify the percentage of longer distance trips it would generate. But, surely this is defeating the key national and local objective of ‘reducing the need to travel’? If, as NW TAR (and CfBT) maintain elsewhere in this response to the A6 MARR planning application, the new road would induce a high level of new and longer traffic movements, this is an undesirable outcome. More and longer trips means more harmful emissions which in turn means poorer air quality. This point should not be ‘sold’ as an advantage, it is an unsustainable downside of the scheme.

Meanwhile there is yet another vague and unquantified statement in para. 9.12.5, ie.

“Overall there is potential for the A6 MARR to provide some important positives..... in the deprived areas in Stockport.....”

No detail is presented as to how this may be realised.

And para. 9.13.4 says:

“ Less deprived areas are not experiencing a disproportionate share of the positive health and well being impacts”

Here again, there are no references provided and it is unclear whether this is the opinion of the author or whether it is based on statistical evidence.

Section 10

Mitigation measures

This section covers construction impact measures: Environmental (see Environmental Statement) . The contention is that many “design” mitigations have been built into the scheme, for example keeping safe footpath access during construction, having a construction management plan and noise barriers and also :

Para. 10.2.11 states: *“20mph zones and shared spaces have been incorporated into the design of the A6 MARR at Wythenshawe (20mph zone), Handforth (shared space scheme), Disley (shared space scheme) and Bramhall (shared space scheme) to deter traffic along key residential and main local roads.”*

The report suggests additional mitigation aspects (in para. 10.4) – local job recruitment, low emission lorries during construction, keep HGVs out of residential streets, monitor traffic flows, support more bus routes, active travel plans (including schools), encourage cycling & walking through engagement with local clubs (?!), and monitoring noise, light and air pollution.

Para. 10.12 claims:

“measures discussed are likely to ensure health inequalities are not widened and could potentially help reduce some of these inequalities over the long term”

One of NW TAR’s key lobbying issues is ‘healthier lives’, as stated on our website. If it should be the case that the A6 MARR is built, and we hope it will not be, we believe that tackling health inequalities should be seen as a major issue. The current HI record in Stockport is poor.

The main mitigation measures appear to ones to address noise and visual impact.

Transport measures relate to the protection of cycle and walking access and the provision of a cycle route along route of the road. The main traffic elements are the 20 mph zone in Wythenshawe and the shared space schemes at Handforth and Disley. It is unknown what level of funding has been set aside for these. The Poynton shared space scheme cost £4M! It is difficult to establish how far residents' suggestions regarding mitigation, set out in the 'Community Views' section, have been addressed in the package.

Regarding specific impacts eg air pollution Queensgate Little Acorns Nursery, St James high and some locations in Disley, it is not apparent how the negative impact is to be mitigated.

Para. 10.2.14 makes the rather weak statement that:

"Discussion on developing bus routes along the A6 MARR have taken place."

This is not adequate. It gives the impression that there are no firm commitments and no new quality bus corridors.

There is a reference in para,10.3 to additional proposed mitigation, but it is not clear what measures these are.

It is unlikely that NW TAR would disagree with any of the specifically stipulated additional mitigation measures proposed, but we query the likelihood of these being funded as an integral part of this scheme. There should certainly be more definitive plans for public transport improvements over and above extending Metrolink to Manchester Airport and adding a fourth heavy rail platform there. For instance, the long-promised Metrolink extension to Stockport from Didsbury and on to Marple, which the SEMMMS final report endorsed,, should be a committed Transport for Greater Manchester scheme, but it is not.

And more effort needs to be expounded to ensure any construction jobs benefit those living in our deprived wards (see para. 10.4.3).

Section 11

This sets out some indicators that could be used to monitor/evaluate on going health impacts.

Section 12

The HIA concludes:

“Extensive changes have been made to the design of the A6 MARR to minimise the potential negative health and wellbeing impacts” (para. 12.1.1)

The headline point is that the health impact is more positive than negative overall.:

Para. 12.1.2 surmises that:

“Overall, the health and wellbeing impacts across the life of the A6 MARR are more positive than negative for the majority of residents, users of amenities and workers in Stockport, Cheshire East and South Manchester and the wards areas considered in this HIA.”

It notes that the pattern of impacts is very complex, however, with some areas and residents experiencing significant negative impacts. It notes that mitigation of negative impacts are embodied in plans, but suggests further mitigation, including:

monitoring noise and air pollution in key communities along the A6 MARR and developing additional ways of creating modal shift, in Stockport, Cheshire East and South Manchester from car and lorry traffic to travel by bus, tram, cycle and foot; in particular developing a green travel plan for the Airport City development (and green travel plans for businesses located within it) and encouraging the development of bus routes along the A6 MARR.

Comments

Regrettably, the HIA has to restrict itself to evaluating the scheme for which it has been commissioned. It cannot, therefore, consider questions like how best to create a transport link which would have a beneficial impact on health, given a budget of £300m.....

The HIA approach endeavours to flush out the often unintended impacts of a project on health, and to help think through how to lessen the negative and enhance the positive. The impacts considered are wide ranging, from the positive effects of improving access to employment (and hence the health gains that come from higher incomes/ self esteem/etc), to the negative impacts of increased accidents or the longer term impact of pollution on health. Weighing such very different impacts to arrive at an “overall balance” is a heroic task.

Comments continued

The conclusion the report comes to, in para. 12.1.2, that the health impact is more positive than negative overall, is pretty meaningless. At best it is subjective; it is not possible to compare the potential health benefits of improved access to facilities with, say, the impact of noise pollution on mental health in any meaningfully quantifiable way.

But some of the inputs to the assessment are open to question too. The biggest health benefit is supposed to come from improved access to employment, resulting both from the economic growth that the road is predicted to deliver, and by making it easier for people to get to employment locations. This argument rests on the Business Case – which we believe to be flawed. And reduced journey times – to jobs, and to a whole range of services (which forms another of the “benefit” components) – rely on the predictions of the traffic model, which again are questionable.

The HIA doesn’t really consider whether these employment-related health benefits will in fact benefit the disadvantaged areas of Stockport and there is no analysis of car ownership or accessibility to employment sites from these parts of Stockport. There is a strong likelihood the scheme will benefit current employees with cars or those unemployed who may have access to a vehicle (car ownership is lower amongst the unemployed).

The conclusions of the HIA are based on an acceptance of the Transport Assessment and Modelling and Business case, being accurate. The robustness of these has been questioned by many objectors, notably ourselves (in great detail). It needs to be borne in mind that in many cases of other road schemes the traffic predictions have been subsequently proved to be inaccurate. The HIA doesn’t seem to consider or build in a degree of uncertainty.

The transport assessment/modelling does not take into account Cheshire East’s proposed new settlement at Handforth East with its 1,800 homes up to 2030 and more thereafter. It does, however, take into account Airport City and Woodford Development.

There is no concrete information presented as to how accessibility by bus will be improved as a result of the scheme. It is therefore open to question as to whether the scheme would have any impact on health inequalities. The HIA is also limited in that it does not assess the likely potential knock on effects of the whole network of SEMMMS roads being built.

Comments continued

HIA's can be good tools for helping to think through the wider consequences of actions, and to suggest ways of reducing negative impacts, but are not always helpful in coming to conclusions about the "overall" balance of benefits. The report does, quite rightly, qualify its conclusions by stressing the complexity of the pattern of benefits and disbenefits, which actually make that overall conclusion pretty meaningless. An in depth HIA would have been more appropriate given the size of this scheme and the size of the full network of SEMMMS schemes (which include the A6 Stockport North-South Bypass). But, according to the HIA, the scope of the report was determined by the Directors of Public Health of the respective areas.

The HIA also does not attempt to quantify the numbers of residents impacted negatively and seems overly qualitative. The Planning Department of Stockport Borough Council has sent consultation letters to some impacted areas. It is assumed, therefore, that some in depth analysis could have been conducted on this cohort and amongst the residents within the three impact zones, rather than merely relying on ward data. A consideration of key services within the impact zones, schools, health care establishments etc and how each specifically may be impacted could perhaps have been included rather than generalist statements.

This HIA also appears to have neglected to examine what the health impacts would have been if all the non-road recommendations in the SEMMMS final report had been enacted and if all the non-road proposals in the Manchester Airport Ground Transport Strategy had been enacted.

The report has not revisited commitments that the three promoting Local Authorities have made to reducing greenhouse gas emissions and tackling climate change. It could have attempted at assessment of how well or how poorly the principal authorities would be likely to measure against their climate change targets if this roads was built and if all the SEMMMS roads were built. The findings could then have been placed in the context of health impacts.

Comments continued

The report underplays the importance of the scheme's impact on air pollution. The input from the Environmental Statement suggests that the overall impact on air pollution will be positive (primarily because although traffic will increase, faster moving vehicles emit relatively less pollution than those held up in traffic jams), but it also acknowledges that it will increase in some areas, including those within AQMAs. *"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"* – quote from Helen Rimmer's "The A6 to Manchester Airport Relief Road: Climate change and air quality impacts" Jan 2013.

Two recent reports have emphasised the continuing link between air pollution and health: WHO *Air quality in Europe 2013*, which shows how poor air quality leads to respiratory problems, heart disease and shortened lives; and a study published in the Lancet Respiratory Medicine journal in November 2013 showing that babies born to mothers who live in areas with air pollution and dense traffic are more likely to have a low birthweight and smaller head circumference. For every increase of 5 micrograms per cubic metre in exposure to fine particulate matter during pregnancy, the risk of low birthweight in the baby rose by 18%.

The impact of noise on health is also perhaps underplayed. It will be felt not only in the "receptors" described in the report, but also by people who now use the area recreationally, and whose health may well be affected as a consequence.

Whilst acknowledging that "the close proximity of the new route to some community/recreational facilities could reduce outdoor activities undertaken in these facilities" it makes no mention of the impact on, for example, the Ladybrook Valley, which is a pleasant and popular walking route, upon which the effect will be profound. Simply keeping access points across the road does not mean that there is no other impact on users.

Comments continued

The report points to the many positive mitigation measures that will be developed, and suggests some additional ones. However, there is little about junction/crossing design and the impact on non-motorised traffic– apart from:

Para. 10.3.1.3 says:

“Ensure junctions are designed to encourage people to cross safely”

but this appears to relate to bus stops/routes. There have been a series of meetings with Vulnerable Users, who have serious concerns about the design of junctions where the proposed multi-user path crosses other major roads. To quote from a recent letter to the design team:

“The current design incorporates several time-consuming multi-stage signal controlled crossings of existing roads. More effective and equitable solutions are available such as bridges or underpasses, or single stage signal controls that would allow cyclists to cross junctions in the same number of stages as their fellow, motorised, road users.”

December 2013

SEMMMS A6 Manchester Airport Relief Road (A6 MARR): a walker's point of view
by Janet Cuff, NW TAR Core Group member/
CPRE Stockport District committee member/
Stockport Walkaday Leader/lifelong Rambler

I am a longstanding walker and have walked the paths that would be affected by the line of the SEMMMS A6 Relief Road over many years for recreational purposes, particularly those at the eastern end, either as an individual or with a group of people. I object to the planning application. A new road in this location would desecrate an important green area and tranquil space.

- The area is a large 'green lung', surrounded on all sides by heavily built-up areas: Hazel Grove to the north, Poynton to the south, Bramhall to the west, and High Lane to the east. Because it is near to these built areas, people can access it easily by public transport or on foot, avoiding the need to drive further out of the urban areas for recreational walking.
- Despite the fact that the road would traverse the urban fringe, the Green Belt that would be affected has a countryside feel to it. It is a predominantly pastoral landscape, with small fields and with many hedgerows retained. When walking on paths running from the north to the south of the area, there are views of hills to the south. A good example of this is found when using paths running between Woodford Road and Lower Park Road.
- Although there is sometimes the distant noise of traffic, the area on the whole is tranquil. This will not be the case if the new road is built.
- Several old farm buildings and cottages remain. Some of these may need to be demolished to make way for the road. Even if they remain, the whole setting will be changed, so that they will lose their rural heritage appeal.
- The hedges, many of which are thought to be longstanding, contain a wide variety of trees and shrubs. In autumn, the many fruits and berries provide a valuable food source for birds. Seeing these hedges and the birds that use them as food and habitat provides extra interest for walkers.
- In the Norbury Hollow area, where walkers cross Norbury Brook from Old Mill Lane there is ancient woodland, designated as a Site of Biological Importance. Bluebells flower here in the spring. The woodland and footpath would be severely affected by the new road.

- The Ladybrook Valley Interest Trail (LVIT) – a long distance walking route - falls within the area. Guide No.7 in a series of leaflets about the LVIT states: *“As you pick your way across the (often muddy) farm tracks and trails, and take in the wonderful rural atmosphere, you will be experiencing true working countryside – so close to Stockport – in one of the most attractive parts of the Ladybrook Valley.”* If the new road is built, this statement will no longer be valid.
- As stated in the main text of the Transport Assessment of the Planning Application (para. 5.51), footpath 109 running south from Old Mill Lane, set in the wooded valley along the banks of Norbury Brook, is part of the LVIT and is described in the Assessment as having high amenity value, *“reflected in the relatively large number of recreational and dog walkers that use this footpath. It is also in close proximity to the residential area that forms the southern fringe of Hazel Grove and the properties along the A6.”* The new road would cross Norbury Brook at this point and, although there would be a path diversion, this “high amenity value” would be lost.
- Footpath 3, linking the dwellings on Mill Hill Hollow to the A523 is also part of the LVIT, but would be truncated by the new road, which will be a very serious loss to walkers, confirmed in para. 5.54 of the Assessment which states: *“The amenity value of the footpath is high as the route runs along the top of the wooded valley of the Ladybrook and wooded field margins.”*
- Despite the fact that footpaths such as footpath 3, and the network of paths described in paragraphs 5.55 and 5.57 have good amenity value, they are described in the Assessment as being poorly used. One reason for this could be that people other than very local people are not aware of these paths. Conclusion 2 of the Information Theme of Stockport Council’s Rights of Way Improvement Plan (ROWIP) states that *“improved information can increase the use of the path network”*, whilst in the Network Maintenance Theme, Conclusion 9 states that *“improvement to signage can encourage wider use of the network”*.
- Given this is a green oasis surrounded by large concentrations of population, it is an ideal area to encourage people to get out walking for their mental and physical well-being, particularly in view of government initiatives promoting regular walking as a way of reducing the likelihood of strokes and heart problems and fighting obesity. Yet there is no evidence of special efforts to publicise the area. On the contrary, information about the LVIT has declined over recent years. A series of leaflets entitled ‘A short walk in the Ladybrook Valley’ were produced by Stockport Council in 1997, but have not been available for some years. This valuable recreational walking area should be saved for future generations and promoted by the principal authorities.

Appendix



37 Stafford Road

Sheffield S2 2SF

Tel: 0114 275 1649

mail@friendsofthepeak.org.uk

mail@cpresouthyorks.org.uk

21-11-2013

Dear Councils,

**SEMMMS A6 to Manchester Airport Relief Road Planning Applications -
Stockport Metropolitan Borough Council DC/053678; Cheshire East Council 13/4355M; Manchester
City Council 104094/FO/2013/S2**

1. The Friends of the Peak District is the national park society for the Peak District and is run by the Peak District and South Yorkshire Branch of the Campaign to Protect Rural England (CPRE). We object to these planning applications. As the Friend's geographical remit is the Peak District National Park and wider Peak District, including High Peak, the infrastructure of the proposed road lies outside our area. Our objection is therefore based on the potential indirect impact of traffic on the Peak District National Park and wider Peak District, and directed at all three councils.

Summary

2. The Friends are extremely concerned that creating a west-east dual carriageway link road from Manchester Airport to the A6 near Hazel Grove, which lies adjacent to the western boundary of the Peak District National Park, would impact adversely on the Park by enabling and encouraging car and road freight traffic into and across the Park. The Business Case presented to the Department of Transport earlier this year actively promoted cross-Park travel and in our view had not assessed the potential impacts of the scheme on the National Park. We have now examined the planning application and its associated Transport Assessment and remain of that view. Until we have seen full and appropriate examination of those impacts and how the authorities propose to mitigate any adverse impacts on the Park, we object to the scheme.

Impacts of the Scheme

3. The scheme would create a dual carriageway between the A6 near Hazel Grove and the M56 that *'will provide much-needed connectivity for key strategic routes into the North West and to Manchester Airport, including traffic from the A6, A523 and A34 - all of which are key routes for business, leisure travel and freight from Cheshire, Derbyshire, Staffordshire, Yorkshire and beyond'*. This was described as one of the three core strategic needs for the scheme in the Business Case (Executive Summary pages 9 and 12).

President: Julia Bradbury

CPRE South Yorkshire and Friends of the Peak District are run by the Campaign to Protect Rural England, Peak District and South Yorkshire
for the countryside, for communities, for the future

4. The Transport Assessment now identifies the need for the scheme (para 1.3) as to:
 - Relieve existing traffic congestion and address poor connectivity which constrains the economy through lengthening journey times. Current congestion reduces labour market catchments and business-to-business activity as well as creating delays on designated freight routes (e.g. the A6) which, in turn, generates productivity losses for businesses;
 - Address the current poor access to/ from the east to Manchester Airport which acts as a barrier for economic growth and regeneration;
 - Relieve current congestion problems along the A6

If all these outcomes are realised we believe that the scheme could lead to adverse impacts on the Peak District National Park.

5. The Transport Assessment para 60 recognises that the A6 is part of the national Primary Route Network and provides a strategic link between Greater Manchester and key towns in north Derbyshire including Buxton, Matlock and Chapel-on-le-Frith. It also serves New Mills and Whaley Bridge, and is a major access route for the Peak District National Park. The traffic modelling predicts a significant increase in traffic flow on the A6 through High Lane and Disley of between 25 to 30% with the A6-MARR in place. This increase is explained as a result of both background traffic growth and the reassignment of longer distance traffic as a result of the introduction of the A6-MARR.
6. In order to address this traffic increase and in response to public concern about it, a separate study is underway to consider traffic growth and demands in the wider A6 corridor. Ultimately, it is predicted *'a multimodal transport strategy is required to manage/ mitigate the predicted traffic growth and associated demands on the public transport networks in the corridor over the next twenty years, with an emphasis on achieving modal shift towards more sustainable modes.*
7. In addition, the promoting Authorities have resolved to implement a package of enhanced mitigation measures on the A6 tailored to limiting, as far as practicable, the impacts of the A6-MARR scheme through a combination of discrete local junction improvements, environmental enhancement measures, and speed management measures. The introduction of these mitigation measures reduces the predicted increased traffic flow to between 11 to 16%.
8. In response to our concerns about the Business Case for the scheme the promoters stated that the impact on the Park is insignificant and traffic growth is due to local developments in the Peak District. We do not agree. The assumptions used in the Transport Assessment in our view continue to undermine this assertion by the promoting authorities. These are (a) the small area of influence used in the modelling, (b) the assumption that traffic growth will continue despite recent trends showing a levelling off of growth, and (c) that traffic growth would be curtailed to 11-16%.

Area of Influence

9. The traffic model uses a very limited area of influence (para 7.19 & Fig 7.1) that surrounds the proposed road but does not extend further east than New Mills or into the wider Peak District. This is a major oversight. The National Park represents a national asset for enjoyment and amenity that attracts nearly 9 million visitors annually, many from Greater Manchester and Cheshire.

The Business Case forecast Appendix B5 Forecasting Report Table 6.5 & para 6.14. traffic increases of up to 33% in 2017 and up to 54% in 2032 are on the A6 Buxton Road where the National Park boundary is no more than 2 miles away and between High Lane and Disley is only yards away.

The A6 Corridor Group consists of representatives from Cheshire East Council, Derbyshire County Council, High Peak Borough Council, Peak District National Park Authority, Stockport Metropolitan Borough Council, and Transport for Greater Manchester.

The majority of these visitors arrive by car and the National Park Authority aims to get as many as possible arriving by more sustainable modes. The A6-MARR would undermine this aim by encouraging visitor journeys in and out of the Park to be continue to be made by car rather than public transport. In addition, the Sheffield City Region has longstanding aims to increase connectivity with the North West, Greater Manchester and Manchester Airport. Of the 22m passengers using Manchester Airport in 2007, about 5.1% (1.1 million) originated from South Yorkshire. Over all, 11% of passengers arrived at the Airport by public transport, although the proportion from the Sheffield City Region using the train or bus was smaller. We have not been able to find the average occupancy of each car accessing the airport but if we assume it is 2 passengers, more than 500,000 cars cross the Peak District every year to access Manchester Airport. In addition 1.9% of passengers (420,000) emanate from Derbyshire, the majority crossing the Peak District by car.

10. The A6 is the only cross-Park route mentioned although there is potential for traffic generation on the A619, A623, A57 and A624 due to long distance car commuting and freight movements. With the scheme in place the A619 and A623 corridor between the M1 at Chesterfield and the M60/M56/M6 could become an attractive alternative to the A50 or the A628 corridor. As the scheme would encourage access to the Park by car and longer distance inter-regional journeys to the airport, the area of influence for the Transport Assessment should have extended over the Peak District to South Yorkshire.
11. If the Transport Assessment were to adopt a wider area of influence, the special qualities of the Peak District National Park would come into play. As the Business Plan did not identify any traffic impacts on the Peak District from the A6-MARR, the Environmental Scoping Report did not identify the National Park as a major environmental asset requiring attention during scheme development. Consequently, the NATA worksheets concerned with landscape, noise and air quality make no assessment of the impacts of increased traffic flows on existing roads near to or crossing the Park. The Environmental Statement Vol 1 7.4.3 (October 2013) has concluded that because of the distance of the infrastructure from the Park there are no significant impacts. If journeys into and across the National Park were properly taken into consideration the Environmental Statement would have to be revisited.

Trends in traffic growth and travel

12. The assumption that traffic growth will continue does not reflect recent trends. DfT forecasts have predicted growth far greater than has occurred recently which refutes the case on which the A6-MARR is founded. Over the last decade there has been a steep decline in the number of trips/person by any mode and the annual average distance travelled per car has fallen by 11%. On all the cross-Park roads mentioned above traffic flows have levelled off during the last decade as reflected in the graph below showing all motor vehicle traffic on Derbyshire major roads. The levelling off of traffic growth within the Park helps fulfil National Park purposes (see below) and the promoting authorities should aim to reduce traffic levels on the A6, and therefore across the National Park, even further through demand management and investment in sustainable travel.

SYPTe and Sheffield City Region DaSTS Connectivity Study January 2010 Workshop Summary Note para 6.1

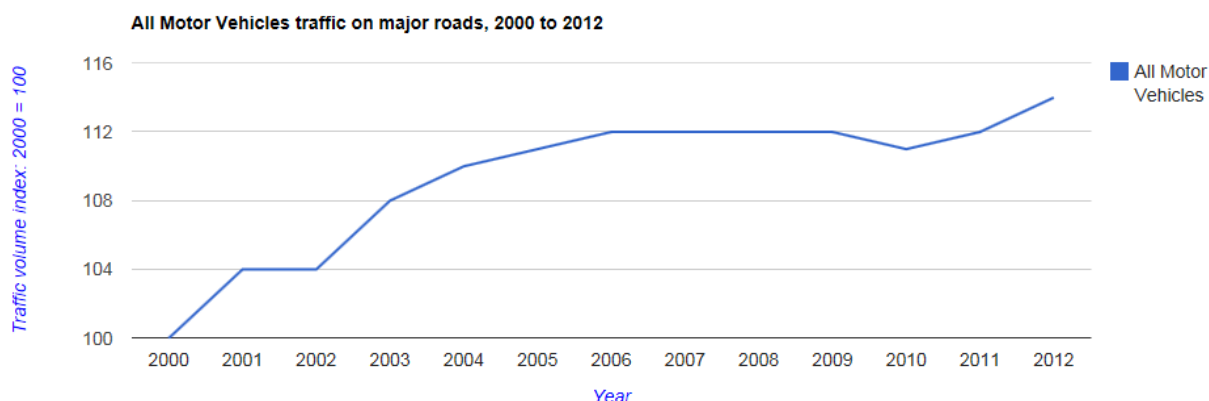
Manchester Airport Ground Transport Plan part of the Manchester Airport Master Plan to 2030, 2007

Outside the Park, the traffic increases on the A6 Buxton Road are forecast to increase substantially by up to 33% in 2017 and up to 54% in 2032.

A package of mitigation measures is being developed between the A6 Hazel Grove to Whaley Bridge aimed at assisting pedestrian and cycle safety along this length of the A6. 'In parallel, CEC, SMBC, Derbyshire County Council, Peak District and TfGM will work together to develop a modal shift strategy for the A6 to Derbyshire which will complement the public transport enhancements the Scheme will secure in terms of increased reliability and efficiency of existing bus services in the corridor.' Business Case para 2.31

Road Traffic Forecasts 2013 Department for Transport

2012 National Travel Survey <https://www.gov.uk/government/organisations/departments-for-transport/series/national-travel-survey-statistics>



Predicted traffic growth

13. Traffic growth of 11-16% is unacceptable due to its impact on people and the environment. However, such growth may be an underestimate. The original South East Manchester Multi-Modal Study (SEMMMS) promotes additional road building - the Poynton Relief Road (now the Woodford-Poynton Relief Road) and the A6 to M60 bypass. The scheme incorporates neither of these but would facilitate a connection with both (Transport Assessment para 2.6). What is proposed would create effectively an outer ring road round the south east of Greater Manchester that would encourage yet more cross-National Park traffic.
14. In addition, the development assumptions presented in Appendix E of the Transport Assessment do not include possible future developments in the South Manchester Corridor. Only committed developments have been included within the core scenario, despite this being a corridor for large scale peripheral growth which would induce traffic.
15. We conclude that the flaws in the assessment of the A6-MARR outlined above underplay the full impacts of the scheme and require the scheme at the very least to be re-modelled, taking into account the full extent of the SEMMMS road schemes, future developments and the widest geography over which impacts would occur. The scheme is unsustainable. As presented it would (i) increase carbon emissions (by 11,586t annually), (ii) increase long distance commuting by car thereby favouring those who do not have to rely on public transport, undermining the use of public transport and of lower carbon modes, and increasing the risk of road accidents (iii) increase traffic impacts on local residents in the Park District and (iv) increase congestion on the A6. It therefore fails to meet the core transport objectives for Greater Manchester, as defined in its LTP3, and the objectives of the A6-MARR itself as presented in the Business Case (paras 3.88-3.89) and the Planning Statement (para 1.3.1). It should be rejected in favour of urban regeneration and investment in public transport.
16. Finally in order to ensure that the Peak District National Park receives the attention it requires by statute, we outline below its status and value.

Greater Manchester's third Local Transport Plan 2011/12 - 2015/16. Its objectives are to:

- ensure that the transport network supports the Greater Manchester economy to improve the life chances of residents and the success of business;
- ensure that carbon emissions from transport are reduced in line with UK Government targets in order to minimise the impact of climate change;
- ensure that the transport system facilitates active, healthy lifestyles and a reduction in the number of casualties, and that other adverse health impacts are minimised;
- ensure that the design and maintenance of the transport network and provision of services supports sustainable neighbourhoods and public spaces and provides equality of transport opportunities; and
- maximise value for money in the provision and maintenance of transport infrastructure and services.

Statutory requirements to consider the Peak District National Park (PDNP)

17. The National Park designation confers the highest status of protection for landscape and scenic beauty. The statutory purposes of National Parks are:
 - i. to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Parks and
 - ii. to promote opportunities for the understanding and enjoyment of the special qualities [of the Parks] by the public.
18. This protection is reflected in the National Planning Policy Framework (NPPF). *‘Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads’.*
19. With respect to transport planning the National Park Circular states that *‘environmental quality should be the primary criterion in the planning of road and traffic management.’ ‘Any investment in trunk roads should be directed to developing routes for long distance traffic which avoid the Parks.’*
20. In other words, even though the scheme would require no new infrastructure or development within the Park the potential and intended traffic generation of the scheme requires formal appraisal of its impact on the Park. Section 62 of the Environment Act 1995 places a general duty on statutory undertakers and relevant authorities, such as the local authorities promoting this scheme (Cheshire East Council, Manchester City Council and Stockport Metropolitan Borough Council) to have regard to the statutory purposes of National Parks when coming to decisions or carrying out their activities relating to or affecting land within the Parks. It has to be demonstrated that this duty has been carried out. The Friends can find no specific reference to meeting this requirement in the A6-MARR planning application.
21. A number of strategies seek to ensure these statutory requirements are met. The Peak District National Park Authority’s Core Strategy (adopted 2011), Policy T1: Reducing the general need to travel and encouraging sustainable transport requires that *‘conserving and enhancing the National Park’s valued characteristics will be the primary criterion in the planning and design of transport and its management. Cross-Park traffic will be deterred. Modal shift to sustainable transport will be encouraged. The impacts of traffic within environmentally sensitive locations will be minimised. Sustainable access for the quiet enjoyment of the National Park, that does not cause harm to the valued characteristics, will be promoted. Demand management and low carbon initiatives will be sought where appropriate.’*
22. Policy T2: Reducing and directing traffic requires that *‘Transport developments which increase the amount of cross-Park traffic or have other adverse effects on its setting and character, amenity and enjoyment will be opposed. Transport developments (including expansion of capacity, widening or a new route) that increase the amount of cross-Park traffic may be accepted but only where there is a demonstrable long term net environmental benefit within the National Park.’*

23. Derbyshire County Council’s third Local Transport Plan aims to

Environment Act 1995, Section 61

National Planning Policy Framework, 2012, para 115

English National Parks and the Broads, UK Government Vision and Circular 2010, paras 84 & 85

- 'Make the best use of what its got;
- Efficient Heavy Goods Vehicle routeing e.g. aiming to avoid villages or the Peak District National Park;
- Transfer of freight from road to rail;
- Improve equality of opportunity to key services for residents and visitors to Derbyshire;
- Reduce carbon emissions;
- More people walking and cycling, with improved health, community and environmental benefits;
- Continuing reductions in casualties.'

24. It is clear from the policies, strategies and plans above that the potential of the scheme to increase cross-Park traffic from Yorkshire and Derbyshire is unacceptable and must be addressed.

Economic Value of the Peak District National Park

25 By ignoring the impacts of the scheme on the Park the promoters have also failed to appreciate that both the economy and society depend on the Park's high quality environment for clean water and air, carbon storage, beautiful landscapes, and physical and spiritual refreshment opportunities. These are essential to our survival and would add up to substantial economic value, which has yet to be fully captured.

26. Nevertheless, economic activity alone in the Park has significant value. The Peak District National Park is worth more than £1.1bn annually and supports over 14,000 jobs across 2,800 businesses. More than two thirds of businesses in the National Parks believe that high landscape quality has a positive impact on their business performance. Over a quarter of businesses think a deterioration in landscape quality would seriously affect their business. The achievement of economic growth in Greater Manchester, to which this scheme is purported to contribute, should not be at the expense of the National Park environment and its businesses.

Conclusions

27. During the preparation of the SEMMMS that proposed the network of roads that includes the A6-MARR, little attention was given to the impacts of the proposals on the Peak District National Park. This disregard for the substantial environmental asset within and adjoining the Greater Manchester City Region has persisted throughout the development of the SEMMMS schemes. The potential adverse impacts on the Peak District National Park of traffic generation on roads adjacent to, within and across the Park by the A6-MARR, have not been investigated and are likely to prove the scheme is unsustainable. Until we have seen that the schemes impacts on the National Park have been considered and assessed through full examination of those impacts, and how any adverse impacts on the Park would be mitigated, we object to it. However, as Greater Manchester's aspirations would be better achieved through urban regeneration and investment in public transport we urge all three Councils to abandon the scheme as unsustainable.

Yours sincerely



Anne Robinson
Transport Campaigner