

Highways England

FREEPOST M60 J18 SIMISTER ISLAND

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Patron  
Her Majesty the Queen  
President  
Emma Bridgewater  
Chair  
Debra McConnell

Dear Highways England Project Team,

1. Thank you for your consultation on Proposal: **Northern Loop & Inner Links options. Simister Island Interchange, Junction 18, M60. Highways England North West Improvements and major Road Projects.**

#### CPRE

2. We are CPRE, the countryside charity, representing Lancashire, the Liverpool City Region and Greater Manchester. We work with communities, businesses and government to protect, promote and enhance our towns and countryside to make them better places to live, work and enjoy, and to ensure the countryside and vital urban green spaces are protected for now and future generations.
3. We have worked for almost a century to support and promote the countryside, and we shall be doing this for generations to come. That's why we call ourselves "The countryside charity".
4. The Climate Emergency is a real and urgent threat and we all, particularly Highways England, must play our part to avoid catastrophic consequences. We must reduce our dependency on transport modes that are high in greenhouse gas emissions.

#### Our opinion

5. Based on the information available, it is considered that, while the proposal options may well be consistent with the remit of Highways England to develop this interchange, they are not consistent with the following material considerations: a) land use, b) planning policy, c) the Greater Manchester Spatial Framework, Revised draft, January 2019, d) the National Planning Policy Framework 2019 and the National Planning Practice Guidance and e) the climate emergency, and f) the recommendation to the government of the Committee on Climate Change, as specified in its fifth carbon budget, that the government should meet the 2045 target of net zero greenhouse gas emissions by the transport sector (see also CPRE's Climate Emergency Sub-paper – *Transport*).
6. The consultation states that the proposal arises from the March 2020 Government's second Road Investment Strategy which includes a commitment for Highways England to improve the Simister Island Interchange between the M62, M60 and M66. The consultation documents state that the proposal aims to reduce peak congestion; reduce journey times and deliver more reliable journey times.

7. The proposed options are addressed through the existing land use planning system, as follows:

#### **National Planning Policy Framework, 2019 (NPPF)**

Chapter 9: Promoting Sustainable Transport, Paragraph 108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users; and*
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

8. The NPPF requires that development proposals provide appropriate opportunities to promote sustainable transport modes. Yet, neither option provides appropriate opportunities to promote sustainable transport or safe and suitable access to the site for all users. The cost strategy is based solely on journey times, which is not considered a sustainable integrated approach as required by the NPPF. Whilst the CPRE notes the efforts represented within this proposal to mitigate the congestion of the area, in our opinion the proposal fails to comply with the requirements of the NPPF.

#### **Greater Manchester Spatial Framework Revised Draft – January 2019 (GMSFRD)**

9. The 2040 Transport Strategy Delivery Plan 2020-2025. January 2019. This sets out all the transport projects to achieve in the next five years to ensure that the planned new housing and employment can be sustainably integrated into Greater Manchester's existing transport infrastructure as far as possible

#### **Transport for Greater Manchester: Draft Delivery Plan: 2020-2025**

10. To deliver long-term 2040 Transport Strategy, 50% of all journeys in Greater Manchester should be made by walking, cycling and public transport by 2040.
11. In the consultation document, the Simister Junction area has a specific site allocation: Northern Gateway: Simister / Bowlee (GMA1.2). This allocates the northern loop area as Open Space and the area immediately to the south of the junction, as Green Belt. This integrates all modes of transport, pedestrian, cycle, and vehicular. In addition, it provides air and noise pollution mitigation along the M62 and M60 motorway corridors.
12. Proposals for extending the public transport system are included in the plan. The junction mitigation options do not appear to interact with this plan, and moving forward this must be addressed appropriately.
13. The GMSFRD is pending presentation to Greater Manchester Committee this July 2020. The advanced stage of this Plan, pending Adoption, sets sound planning precedence, providing the current spatial planning remit for the site.
14. The proposals are considered contrary to the GMSFRD, Transport Strategy Delivery Plan, in (Northern Loop) infringing upon draft allocated 'Open Space'. Neither option provides appropriate required integrated transport modes, or air or noise pollution mitigation mechanisms. These mechanisms are required to ensure these matters are properly assessed and mitigated.

15. The CPRE's Climate Emergency Sub-paper – Transport states that transport in the UK accounts for 28% of UK greenhouse gas emissions in 2017 and is the only sector in which emissions have increased since 1990. Nitrogen Oxides (NOx) produced in the combustion process are also greenhouse gases and NOx and particulate matter – PM10s and PM 2.5s - are major contributors to respiratory disorders and cardiovascular diseases. This is an acknowledged air and noise quality concern area. Our sub-paper includes the advice for:
- i. Binding carbon targets and budgets
  - ii. Implementation of a functional transport hierarchy.
  - iii. Reducing the need to travel
  - iv. Modal shift through the provision of quality and sustainable public transport...
  - v. Freight and local deliveries.
  - vi. A genuine “logistics-based” approach to distribution is required to integrate the delivery of goods to their final destinations
  - vii. National and local government transport planning
16. A national strategic network approach that integrates all travel modes should provide a framework by which local authorities and combined authorities can also plan infrastructure investment and well-connected services.
17. Whilst the CPRE welcomes this consultation opportunity, the proposal is deemed contrary to Chapter 9 of the NPPF, arising from its lack of integrated sustainable transport assessment, and also contrary to the Greater Manchester Spatial framework Revised Draft – January 2019, Transport Strategy Delivery Plan, in (Northern Loop) infringing upon draft allocated ‘Open Space’. Neither option provides appropriate required integrated transport modes, or air or noise pollution mitigation mechanisms.
18. Having addressed the principle of the proposal, CPRE also notes concerns arising from impacts on:
- the character and appearance of the countryside and its enjoyment by users;
  - access to the countryside;
  - biodiversity;
  - drainage

### **Countryside Landscape Character and Amenity**

19. The existing planning policy framework which informs land use development of the site is located in the Greater Manchester Spatial framework Revised Draft – January 2019, which are accompanied by proposals maps These define the area as predominantly open space, some Green Belt and a motorway junction. There does not appear to have been an assessment of loss of open space, or potential loss of Green Belt and resultant harm and the negative impact on its users to inform the planning balance adequately.
20. The proposal appears to have made no response to the requirements of the Greater Manchester Spatial Framework Revised Draft – January 2019, and thereby also to the NPPF 2019, paragraphs 97 and 133 which protect the Green belt and require loss of open space only when surplus; provided with the equivalent or due to provision of an alternative sports and recreational facility.

## Access to the countryside

21. The CPRE supports access to the countryside, as does the NPPF paragraph 96 and the GMSFRD, but regrettably the proposal is deficient in this regard and it is an issue that should be properly addressed.

## Biodiversity

22. The proposal states that an Environmental Impact Assessment of the two options has been carried out and that a report will be published when complete. CPRE is keen to review the document to understand better the environmental impacts of the proposals; indeed, CPRE believes that the consultation should have been deferred until the document is available.

23. NPPF paragraphs 170 and 174 require development proposals to 'contribute to and enhance the natural and local environment by:

*a) Protecting and enhancing valued landscapes, ...*

*d) minimising impacts on and provide net gains for biodiversity.*

24. In the absence of the EA report, no information has been provided to justify the claim made by Highways England that no significant impacts on the environment are expected; nor are details supplied for assessment of the visual screening or noise barriers referred to. It is therefore considered that in the absence of evidence to substantiate these claims of "no significant impacts" that the proposal is contrary to the NPPF and GMSFRD.

## Conclusion

25. The proposal scheme is made in answer to government requirements, however it presently lacks the required detail to ensure a robust decision can be made, due to the failure to address land use planning requirements, including the provision of an EA.

26. The CPRE would welcome any opportunity to discuss these concerns and any redrafted scheme

Yours sincerely



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