



Response to:

**M60/M62/M66 Simister Island
Interchange Statutory Consultation**

Introduction

Transport Action Network (TAN) OBJECTS to the proposed scheme at Simister Island Interchange.

Further detail

Simister Island is one of the busiest motorway junctions in the north-west, and is already within Noise Important Areas (NIA) and Air Quality Management Areas (AQMA). However, instead of dealing with the severe air and noise pollution faced by local people, this scheme would make things worse.

Climate change

It would increase traffic and carbon emissions when the UK needs to rapidly decarbonise transport. Any increase in emissions materially affects the UK's ability to stick within our current carbon budgets, and this road expansion will make things worse. This scheme therefore undermines our legal duty under the Climate Change Act 2008 to reach net zero by 2050, and our Nationally Determined Contribution (NDC) under the Paris Agreement to achieve 68% cuts by 2030.

There is a lot of information missing from the Preliminary Environmental Information Report (PEIR) including the carbon emissions caused by the construction of the scheme, and the total additional carbon emissions over its lifetime caused by the extra traffic.

Failure to consider non-roadbuilding alternatives

Only roadbuilding options have been considered, and National Highways should work with Transport for the North to examine alternative ways to relieve congestion and reduce traffic in this region. The objectives of any proposed scheme should be corrected so that reducing air and noise pollution of the existing road are the primary objectives. TAN recommends that decreasing speed limits for these stretches of motorway would achieve these objectives at a fraction of the cost of the proposed scheme.

Noise pollution

The scheme would increase noise pollution for the residents, both during construction and operation, who already live alongside the existing road and are exposed to existing high levels of noise and air pollution. This would be particularly severe during construction, causing a major adverse impact for local residents.

Air Pollution

With or without the scheme, air pollution levels will still be unacceptably high and above safe limits. The scheme only results in marginal improvement in air quality in some areas.

National Highways should be examining solutions that will decrease the unacceptable level of noise and air pollution caused by the existing road.

Greater Manchester has signed up to achieve WHO 'BreatheLife City' status by 2030, which means achieving WHO targets for air pollutants by 2030, i.e. 10 µg/m³ for NO₂ and 15 µg/m³ for PM₁₀. Air pollution levels without and with the scheme fall well short of WHO targets in 2027, leaving only three years to achieve them. The failure to reduce air pollution undermines Greater Manchester's aspirational targets for lower pollution by 2030.

The traffic projections for the scheme assume increased traffic growth and worsening congestion. However, the UK will need to reduce traffic, as electrification of the vehicle fleet will not be enough to allow us to meet our legal obligations on tackling climate change. Therefore the projections of traffic and air pollution without the scheme are likely to be overstated, and assume 'business as usual'.

There are two local primary schools in the vicinity of the proposed scheme, Our Lady of Grace and St Margarets, and the scheme would have an adverse impact on young schoolchildren with developing lungs.

Green Belt

Other information missing from the PEIR is on the impact on the Green Belt, despite the majority of the scheme lying within it. However National Highways has deferred assessment of this until its full DCO planning application.

Safety

National Highways have also failed to include a full assessment of road collisions or consider other ways of addressing safety such as introducing speed limits which would also have an immediate effect on air and noise pollution.

Severance

It is also disappointing that no attempt has been made to reduce the severance caused by the scheme and to upgrade the quality of the existing links, such as the underpass that allows people to walk from Heybrooks Close south, under the M62 to connect to Parrenthorn Road and access to the schools there. This route should be formally made a bridleway, and made suitable for people to walk and cycle between the two areas. Other opportunities for improvements should also be explored and should have formed part of the scheme objectives.

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Transport Action Network

Transport Action Network provides free support to people and groups pressing for more sustainable transport in their area and opposing cuts to bus services, damaging road schemes and large unsustainable developments

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