

For official use only	
Respondent No.	
No of Representation(s)	

## Places for Everyone: Modifications Consultation Response Form

Comments invited until 23:59 p.m. 6 December 2023

Please read the guidance notes before completing this form

Please return the form to:

**Email:** [placesforeveryone@greatermanchester-ca.gov.uk](mailto:placesforeveryone@greatermanchester-ca.gov.uk)

**Post:** Planning and Housing Team  
Greater Manchester Combined Authority  
Tootal Buildings,  
56 Oxford Street,  
Manchester  
M1 6EU

Alternatively, you can complete your representation online: <https://www.gmconsult.org/>

Please note this form has two parts:

**Part A:** Personal / Agent's Details: need only to be completed *once* (we cannot register your representation without these details).

**Part B:** Your comments: (please fill in a new sheet for each modification/set of comments you wish to make).

## **Part A - Personal / Agent's Details**

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes in (i) but complete the full contact details of the agent in (ii).*

Details	(i) Personal Details*	(ii) Agents Details* (if applicable)
Title	Mr	
First Name	Pete	
Last Name	Abel	
Organisation (where relevant)	Manchester Friends of the Earth	
Address Line 1		
Address Line 2		
Address Line 3	Manchester	
Address Line 4		
Post Code		
Tel. No.		
E-mail Address		

### **Data Protection Notice**

Please note that all comments will be held by GMCA and made available in accordance with our privacy notice. For further information concerning the Places for Everyone privacy notice please visit the GMCA website.

☒ *Tick this box to confirm that you understand that your response will be published with your full name and details passed to the Planning Inspectors, and that you have read and understood the Privacy Notice*

## **2. Are you aged 13 and over?**

*Data protection laws mean that we are not allowed to store and keep the details of anyone under the age of 13. If you are under the age of 13 and would like to submit a response, please do so with the details of your carer, parent or guardian, (with their permission).*

☒ Yes, I am over the age of 13

- ☐ No, I am under the age of 13 and the personal details above are those belonging to my parent, carer or guardian

## **Part B: Your consultation response**

Please use a new sheet for each modification/set of comments you wish to make. If you have any supporting documents, please clearly reference their names in your response and attach a copy of them with this form.

**3. To which Main Modification and/or Policies Map change(s) in the Places for Everyone Plan does your comment relate?** *Please see the Main Modification Schedule, the Policies Map Changes Schedule, the Composite Plan, the Integrated Assessment documentation (which includes the Sustainability Appraisal) and the Habitats Regulation Assessment*

**Main Modification/Policies Map change number** e.g. MM11.1, PMC2

**MM5.11 (JP-S6 Clean Air)**

**3a. Do you think the modification you have listed above is needed to make the Plan sound and/or legally compliant?** *e.g. I agree/disagree that this modification should be to the plan because...*

If you wish to comment on the Integrated Assessment or the Habitats Regulations Assessment of the modifications, please include this with your answer below.

Manchester Friends of the Earth made this recommendation at the Examination in Public hearings and support this modification and believes that they are justified.

Modify paragraph 5.44 as follows:

“Greater Manchester has also signed up to achieve WHO ‘BreatheLife City’ status by 2030, which means achieving WHO targets for PM (PM2.5 must not exceed ~~10~~ 5 µg/m3 annual mean) and other air pollutants by this date. Regardless of targets, there is no clear evidence of a safe level of exposure below which there is no risk of adverse health effects. As such, policy ambitions should always be to reduce air pollution to as low as possible as further reduction of PM or NO2 concentrations below air quality targets/standards are likely to bring additional health benefits.”

We note that the World Health Organisation (WHO) recently lowered their air pollution limits and now recommends that PM2.5 and NO2 should not exceed an annual mean concentration of 5 micro-grams per cubic metre and 10 micro-grams per cubic metre respectively.<sup>1</sup>

We would recommend that the WHO guidance for nitrogen dioxide also be specified in the MM5.11.

We note that in 2016, Client Earth won a court case that instructed the Government to meet the legal air quality limits in “**the shortest time possible**”. The Court specifically highlighted that in 2016, a proposed 2020 Government timeline for reducing nitrogen dioxide levels below the legal limit was “**too distant**” (our emphasis).<sup>2</sup>

We therefore argue that the suggested modification in paragraph 5.48 is not justified and is not consistent with national policy as it removes the reference to the Government mandated legal obligation to reduce nitrogen dioxide to below the legal limit in the “**shortest time possible**”.

*Modify paragraph 5.48 as follows:*

*“5.48 Greater Manchester Authorities have been working collaboratively to produce a Clean Air Plan, that will bring about compliance with the legal limit for NO<sub>2</sub>. ~~in the shortest possible time and in any case by 2024.~~”*

We also note that the modelling for the current Greater Manchester Clean Air Plan is only based on reaching the current legal limits for NO<sub>2</sub> (40.4 ug/m<sup>3</sup>) and not the revised World Health Organisation guidance.

### **3b. If so, is this wording effective?**

No. Paragraph 5.48 should include the text “in the shortest time possible.” To be in line with national policy and the Government instruction to the Greater Manchester local authorities.

### **3. To which Main Modification and/or Policies Map change(s) in the Places for**

**Everyone Plan does your comment relate?** *Please see the Main Modification Schedule, the Policies Map Changes Schedule, the Composite Plan, the Integrated Assessment documentation (which includes the Sustainability Appraisal) and the Habitats Regulation Assessment*

**Main Modification/Policies Map change number** e.g. MM11.1, PMC2

**MM5.12 JP-S6 Clean Air**

**3a. Do you think the modification you have listed above is needed to make the Plan sound and/or legally compliant?** e.g. *I agree/disagree that this modification should be to the plan because...*

If you wish to comment on the Integrated Assessment or the Habitats Regulations Assessment of the modifications, please include this with your answer below.

Manchester Friends of the Earth supports the proposed modifications to Criterion 3, 4 and 9 and believes that they are justified and consistent with national policy.

Modify criterion 3 as follows:

"3. Requiring applications for developments that could have an adverse impact on air quality to submit relevant air pollution data so that adverse impacts on air quality can be fully assessed and development only permitted where they are acceptable and/or suitable mitigation can be provided; and, if approved, to make appropriate provision for future monitoring of air pollution;"

Modify criterion 9 as follows: "9. Controlling traffic and parking within and around schools, and early years sites and other locations that are particularly sensitive to air quality;"

**3b. If so, is this wording effective?**

Yes.

**3. To which Main Modification and/or Policies Map change(s) in the Places for Everyone Plan does your comment relate?** *Please see the Main Modification Schedule, the Policies Map Changes Schedule, the Composite Plan, the Integrated Assessment documentation (which includes the Sustainability Appraisal) and the Habitats*

<i>Regulation Assessment</i>	
<b>Main Modification/Policies Map change number e.g. MM11.1, PMC2</b>	<b>MM5.3. and MM5.2 JP-S2 Carbon and Energy</b>
<p><b>3a. Do you think the modification you have listed above is needed to make the Plan sound and/or legally compliant? e.g. I agree/disagree that this modification should be to the plan because...</b></p> <p>If you wish to comment on the Integrated Assessment or the Habitats Regulations Assessment of the modifications, please include this with your answer below.</p>	
<p>Manchester Friends of the Earth does not support the deletion of criterion 4 as follows: “4. Keeping fossil fuels in the ground;” and believes that the deletion is not justified and not consistent with national policy.</p> <p>The justification in MM5.3 is that criterion is “considered to be inconsistent with national policy.”</p> <p>In 2019, the Government announced a ban on fracking in England on the basis of new scientific analysis and that separate proposals to change the planning process for fracking sites will no longer be taken forward at this time.<sup>3</sup> This ban was re-instated by Rishi Sunak, the current Prime Minister in October 2022.<sup>4</sup></p> <p>We believe criterion 4 of policy JP-S2 is justified and consistent with national policy because:</p> <ul style="list-style-type: none"> <li>• The GM Joint Minerals Plan<sup>5</sup> suggests that Greater Manchester is only likely to have coal and unconventional gas resources.</li> <li>• NPPF paragraph 217 suggests planning permission for coal extraction should only be granted in exceptional circumstances, which are unlikely to apply in Greater Manchester given its predominantly urban nature and its ambition to be a climate leader.</li> </ul> <p>We also note that in February 2022, the Climate Change Committee stated that: “<b>the evidence against any new consents for coal exploration or production is overwhelming</b>”<sup>6</sup> (our emphasis) and that in September 2023, the International Energy Agency stated: “no new long-lead-time upstream oil and gas projects are needed. Neither are new coal mines, mine extensions or new unabated coal plants.”<sup>7</sup></p> <p>Therefore, Manchester Friends of the Earth would argue that the original GMCA commitment in Places for Everyone “to keep fossil fuels in the ground remains, at this time therefore we will not support fracking” is justified and consistent with national Government policy and NPPF with regard to coal and shale gas as both are types of fossil fuels.</p>	

### MM5.23 JP-S2 Carbon and Energy

Modify paragraph 5.19 as follows: “5.19 Greater Manchester seeks to promote investment in new zero-carbon technologies, to reduce the reliance on carbon-based fuels to accelerate the speed at which such new technologies become financially viable and/or technically feasible. ~~Work undertaken by the Tyndall Climate Change Research Centre<sup>45</sup> has shown that the continued extraction of fossil fuels will not be compliant with a carbon emissions reduction pathway that is aligned with international commitments within the ‘Paris Agreement’. It is therefore considered prudent to not exploit new sources of hydrocarbons and keep fossil fuels in the ground so at this point in time we will not support hydraulic fracturing (fracking).~~”

See MM5.3. JP-S2 Carbon and Energy above – for the reasons that Manchester Friends of the Earth believe that this modification is neither justified nor consistent with national policy.

### 3b. If so, is this wording effective?

No.

**3. To which Main Modification and/or Policies Map change(s) in the Places for Everyone Plan does your comment relate?** *Please see the Main Modification Schedule, the Policies Map Changes Schedule, the Composite Plan, the Integrated Assessment documentation (which includes the Sustainability Appraisal) and the Habitats Regulation Assessment*

**Main Modification/Policies Map change number** e.g. MM11.1, PMC2

**MM5.3 JP-S2 Carbon**

	and Energy
<p><b>3a. Do you think the modification you have listed above is needed to make the Plan sound and/or legally compliant? e.g. I agree/disagree that this modification should be to the plan because...</b></p> <p>If you wish to comment on the Integrated Assessment or the Habitats Regulations Assessment of the modifications, please include this with your answer below.</p>	
<p>Manchester Friends of the Earth is concerned that the suggested modification would provide some developers with a convenient opt-out from meeting higher 'zero carbon' building standards and therefore are not effective or justified.</p> <p>Modify criterion 8 as follows: "8. An expectation that new development will, <u>unless it can be demonstrated that it is not practicable or financially viable</u>;..."</p> <p>We note that since 2019, Reading Borough Council's Local Plan requires that all new residential developments of ten or more homes are built to zero carbon standards if possible. Zero carbon is an achievable standard that, until recently, was intended to be a national requirement in UK building regulations. The council's Local Plan states that if reaching the zero-carbon standard is not possible (as determined by the developer), the development must deliver a 35% or greater reduction in carbon emissions compared to minimum UK standards.<sup>8</sup> In January 2022, it was reported that Reading had surpassed its target for new homes in the borough.<sup>9</sup></p> <p>We also note that other English council areas such as Oxford<sup>10</sup> and Lancaster are pressing ahead with earlier 'net zero carbon' targets in their Local Plans.</p> <p>Other local authorities are already implementing, or seeking to implement, 'zero carbon' housing standards. New housing developments are being built to higher standards and these developments are clearly both 'practicable' and 'financially viable'.</p>	
<p><b>3b. If so, is this wording effective?</b></p>	

No.

**3. To which Main Modification and/or Policies Map change(s) in the Places for Everyone Plan does your comment relate?** *Please see the Main Modification Schedule, the Policies Map Changes Schedule, the Composite Plan, the Integrated Assessment documentation (which includes the Sustainability Appraisal) and the Habitats Regulation Assessment*

**Main Modification/Policies Map change number** e.g. MM11.1, PMC2

**MM1.9**  
**Para. 1.52**  
**Introduction**

**3a. Do you think the modification you have listed above is needed to make the Plan sound and/or legally compliant?** *e.g. I agree/disagree that this modification should be to the plan because...*

If you wish to comment on the Integrated Assessment or the Habitats Regulations Assessment of the modifications, please include this with your answer below.

Whilst, the Introduction text is not policy text, Manchester Friends of the Earth does not support the modification in paragraph 1.52:

“... A key element of this is ~~to require all~~ set out a pathway for new development to be net zero carbon by 2028 at the latest – we do not want to build homes and workplaces which require retrofitting in the future and we have set an ambitious target, backed up by our evidence to achieve this as soon as possible.

Manchester Friends of the Earth supports all new developments being zero net carbon but believes that too much time is being given for developers to meet the zero-carbon homes deadline - the compliance date should be brought forward before 2028.

**3b. If so, is this wording effective?**

No.

**3. To which Main Modification and/or Policies Map change(s) in the Places for Everyone Plan does your comment relate?** *Please see the Main Modification Schedule, the Policies Map Changes Schedule, the Composite Plan, the Integrated Assessment documentation (which includes the Sustainability Appraisal) and the Habitats Regulation Assessment*

**Main Modification/Policies Map change number** e.g. MM11.1, PMC2

**MM7.5 JP-H2**  
**Affordability of New Housing**

**3a. Do you think the modification you have listed above is needed to make the Plan sound and/or legally compliant?** e.g. *I agree/disagree that this modification should be to the plan because...*

If you wish to comment on the Integrated Assessment or the Habitats Regulations Assessment of the modifications, please include this with your answer below.

Manchester Friends of the Earth disagrees with the modification to Criterion 2 and believes that this modification is neither consistent (with P4E Objective 1), effective or justified.

*~~"2. Aiming to deliver our share of at least 50,000 additional affordable homes across Greater Manchester up to 2037, with at least 60% being for social rent or affordable rent. Maximising the delivery of additional affordable homes<sup>81</sup>, including through local plans setting targets for the provision of affordable housing for sale and rent as part of market-led developments based on evidence relating to need and viability"~~*

The justification for this modification states that it aims:

*"To clarify, providing a strategic framework for local plans in setting targets for affordable homes."*

We argue that this modification means that Places for Everyone will no longer provide a strategic framework of affordable housing targets for local plans because it no longer specifies housing numbers. The P4E plan is a Joint Strategic Plan for the nine participating local authorities we do not understand why it does not identify an overall (minimum) target for affordable housing. This modification makes P4E less consistent with Objective 1 (Increase the number of affordable homes).

The new Greater Manchester Devolution Deal includes local leadership of the Affordable Homes Programme (£400 million) and £3.9 million to eliminate the use of bed and breakfast accommodation for homeless families which would support the deleted target.

In addition, the target of some 30,000 homes for social rent does not seem to be included. Whilst this is not required to make the plan sound it could result in those in housing need across Greater Manchester facing a postcode lottery.

### **3b. If so, is this wording effective?**

No.

**3. To which Main Modification and/or Policies Map change(s) in the Places for Everyone Plan does your comment relate?** *Please see the Main Modification Schedule, the Policies Map Changes Schedule, the Composite Plan, the Integrated Assessment documentation (which includes the Sustainability Appraisal) and the Habitats Regulation Assessment*

**Main Modification/Policies Map change number e.g. MM11.1, PMC2**

**MM10.3. JP-C1.  
An Integrated  
Network**

**3a. Do you think the modification you have listed above is needed to make the Plan sound and/or legally compliant?** *e.g. I agree/disagree that this modification should be to the plan because...*

If you wish to comment on the Integrated Assessment or the Habitats Regulations Assessment of the modifications, please include this with your answer below.

Manchester Friends of the Earth supports the modification to include the following text:

“Enabling the prioritisation of more sustainable modes of transport to encourage use and put more vulnerable transport users first informed by the hierarchy contained in the 2016 NACTO Global Street Design Guide adopted by GMCA in 2017.”

We believe that this is justified and consistent with Greater Manchester and national policy.

**3b. If so, is this wording effective?**

Yes.

**3. To which Main Modification and/or Policies Map change(s) in the Places for Everyone Plan does your comment relate?** *Please see the Main Modification Schedule, the Policies Map Changes Schedule, the Composite Plan, the Integrated Assessment documentation (which includes the Sustainability Appraisal) and the Habitats Regulation Assessment*

**Main Modification/Policies Map change number** e.g. MM11.1, PMC2

**MM4.26. JP-Strat10. Manchester Airport**

**3a. Do you think the modification you have listed above is needed to make the Plan sound and/or legally compliant?** e.g. *I agree/disagree that this modification should be to the plan because...*

If you wish to comment on the Integrated Assessment or the Habitats Regulations Assessment of the modifications, please include this with your answer below.

We agree with the modification to delete the text relating to the Manchester Airport Group Corporate Social Responsibility strategy as this is “not a formal planning document, therefore it has no planning status as such”.

However, we note that Main Modification MM4.26, paragraph 4.67 would still contain the text “an expanding route network could see throughput growing to make best use of its existing runways and handle around 55 million passengers per annum.”

This is an even greater passenger number projection than was outlined in the Greater Manchester Transport 2040 Strategy which stated: “Manchester Airports Group (MAG) has ambitious plans to grow its passenger market from 24 million trips per annum in 2016 to 45 million,” (page 79).<sup>11</sup>

The Greater Manchester 2038 climate plan adopted by the Greater Manchester Combined Authority and the 10 local authorities is based upon research by the Tyndall Centre.

This research identifies a ‘carbon budget’ for Greater Manchester. This carbon budget assumes that aviation emissions will remain constant until 2030 and then decrease rapidly from 2030 to 2075.<sup>12</sup> Any increases in aviation emissions from Manchester Airport would require even greater reductions in other sectors to meet the 2038 net zero target.

Manchester Friends of the Earth believes that this ‘target’ should not be contained in the Places

for Everyone strategy as it is not consistent with the Greater Manchester 2038 climate strategy or compatible with national policy, including the UK Carbon Budget and Climate Change Committee recommendations, especially in the context of Heathrow, where a third runway would preclude any increases in flight emissions from other airports.

**3b. If so, is this wording effective?**

No.

**3. To which Main Modification and/or Policies Map change(s) in the Places for Everyone Plan does your comment relate?** *Please see the Main Modification Schedule, the Policies Map Changes Schedule, the Composite Plan, the Integrated Assessment documentation (which includes the Sustainability Appraisal) and the Habitats Regulation Assessment*

**Main Modification/Policies Map change number** e.g. MM11.1, PMC2

**MM10.13. JP-C7. Transport Requirements of New Development.**

**3a. Do you think the modification you have listed above is needed to make the Plan sound and/or legally compliant?** e.g. *I agree/disagree that this modification should be to the plan because...*

If you wish to comment on the Integrated Assessment or the Habitats Regulations Assessment of the modifications, please include this with your answer below.

Manchester Friends of the Earth supports the modification to include the paragraphs outlined below in JP-C7. These modifications are justified and are consistent with national policy.

Insert new paragraphs after paragraph 10.76 as follows:

New Paragraphs “Policies within JP-C7 seek to enable a reduction in the need to travel by private car and prioritise sustainable transport opportunities ahead of capacity enhancements on the highway network. Where a transport assessment is required, this should start with a vision of what the development/allocation is seeking to achieve and then test a set of scenarios to determine the optimum design and transport infrastructure to realise this vision.

In the first instance, new development should give priority to walking, wheeling and cycle movements and facilitate access to high-quality public transport where possible. Appendix D1 sets out the indicative transport mitigation that has been identified in relation to the Plan allocations (through the Locality Assessment process and the SRN Future Work Programme Technical Report) in a single strategic “worstcase” scenario. Detailed scenarios, underpinned by local traffic counts, will need to be assessed and developers will need to develop effective detailed mitigation for the site which demonstrates that the mitigation will deliver the vision identified.

The interventions in Appendix D to support walking, wheeling and cycle movements and to facilitate access to high-quality public transport should be considered as a starting point for developers to mitigate the impacts of allocations.

The highway interventions in Appendix D should be considered by developers to mitigate the impact of allocations only once alternative options to manage down the traffic impacts of planned development have been considered as a first preference.

The existing evidence suggests that the “necessary” mitigation would be required to deliver the allocations in the scenario tested, and “supporting” mitigation are complementary measures that could further improve the accessibility and/or transport sustainability of the allocation. As a starting point, it would be beneficial to consider both necessary and supporting interventions through the Transport Assessment scenario testing.

In order to assess the cumulative impacts of growth, when undertaking a Transport Assessment for development proposals that are consistent with the Plan, developers will need to consider committed development, including relevant local plan allocations, where there is a reasonable degree of certainty they will proceed within the next 3 years. In consultation with local highways authorities, developers should agree the committed developments / allocations and potential transport interventions (which may come forward in the next 3 years) that should be considered in the assessment.

Where development proposals are not consistent with an up-to-date plan or strategy,

the Transport Assessment should include all relevant development that is consented or allocated over the entirety of the plan period.

Developers will be expected to contribute to the funding and delivery of required new infrastructure or services.”

**3b. If so, is this wording effective?**

Yes.

**3. To which Main Modification and/or Policies Map change(s) in the Places for Everyone Plan does your comment relate?** *Please see the Main Modification Schedule, the Policies Map Changes Schedule, the Composite Plan, the Integrated Assessment documentation (which includes the Sustainability Appraisal) and the Habitats Regulation Assessment*

**Main Modification/Policies Map change number** e.g. MM11.1,  
PMC2

JPA3.2 Timperley  
Wedge, MMCB14,  
MMW6 JPA36  
Pocket Nook.  
  
Relating to HS2.

**3a. Do you think the modification you have listed above is needed to make the Plan sound and/or legally compliant?** e.g. *I agree/disagree that this modification should be to the plan because...*

If you wish to comment on the Integrated Assessment or the Habitats Regulations

Assessment of the modifications, please include this with your answer below.

The Government officially announced the cancellation of the Birmingham to Manchester section of HS2 on 4<sup>th</sup> October 2023.<sup>13</sup>

Given the Government announcement of the cancellation of the HS2 from Birmingham to Manchester are the Main Modifications which reference HS2 consistent with national policy and justified?

The Main Modifications (MDC1) document has multiple references to HS2 in relation to a range of Places for Everyone policies (transport, housing, nature etc) and site/land allocations.

For example: MMCB14. JPA3.2 Timperley Wedge, MMW6 JPA36 Pocket Nook

Modification MMCB15. JPA3.2 Timperley Wedge states that:

“Modify the first and second sentences of paragraph 11.93 as follows:

11.93 The Greater Manchester HS2/NPR Growth Strategy identifies the opportunities of this strategically important and well-connected location adjacent to the proposed HS2 Airport station. The exceptional circumstances for taking this the safeguarded land out of the Green Belt are directly related to the potential this land has to capitalise directly on the economic benefit brought by HS2.

Modify the first sentence of paragraph 11.94 as follows:

**11.95 The area around the proposed Manchester Airport HS2 Station has been removed from the Green Belt but will only be considered a sustainable location after delivery of HS2 Airport Station.”** (our emphasis).

As the exceptional circumstances for the Green Belt release identified in the policies to which these Main Modifications relate are no longer applicable, we believe the Green Belt release is no longer justified or consistent with national policy.

**3b. If so, is this wording effective?**

**3. To which Main Modification and/or Policies Map change(s) in the Places for Everyone Plan does your comment relate?** *Please see the Main Modification Schedule, the Policies Map Changes Schedule, the Composite Plan, the Integrated Assessment documentation (which includes the Sustainability Appraisal) and the Habitats Regulation Assessment*

**Main Modification/Policies Map change number** *e.g. MM11.1, PMC2*

**MM4.13 JP-Strat4**  
**Port Salford and**  
**MMS8 JPA29 Port**  
**Salford Extension**

**3a. Do you think the modification you have listed above is needed to make the Plan sound and/or legally compliant?** *e.g. I agree/disagree that this modification should be to the plan because...*

If you wish to comment on the Integrated Assessment or the Habitats Regulations Assessment of the modifications, please include this with your answer below.

Manchester Friends of the Earth would recommend that the focus of sustainable travel opportunities should be widened beyond the travel “needs of the employees accessing the site.”

We note that there are committed proposals for the “enhancement of the wider motorway

network” yet no mention of sustainable freight alternatives.

Modify third paragraph as follows:

“The development of Port Salford must be delivered together with ~~ensure that~~ necessary transport infrastructure ~~is delivered~~, including highway improvements to accommodate the likely scale of traffic generation, in a way that is compatible with committed proposals for the enhancement of the wider motorway network and the provision of appropriate sustainable travel opportunities to meet the needs of the employees accessing the site. The growth of Port Salford will be managed to reflect the creation of additional capacity in the transport network and in accordance with the requirements of policy JPA29.”

MMS8 JPA29 Port Salford Extension

5. a) Delivering necessary highway improvements of a strategic and local nature to cater for the additional traffic created by the expansion of Port Salford in a way that is compatible with any proposals for the enhancement of the wider motorway network and ensures the safe and efficient operation of the local road network;

Once again, no reference to sustainable freight alternatives.

### 3b. If so, is this wording effective?

Without reference to sustainable freight alternatives, no.

**4. If you would like to comment on an Additional Modification, please give your response below.** *Please see the Additional Modifications Schedule and the Composite Plan. Please note that comments on Additional Modifications will not be*

*subject to the Inspector's scrutiny; the nine PfE authorities will consider these comments.*

**Additional Modification Number e.g. AM4.1**

**Signature**

**Date**

**5<sup>th</sup> December 2023**

## References

<sup>1</sup> New WHO Global Air Quality Guidelines aim to save millions of lives from air pollution. <https://www.who.int/news-room/feature-stories/detail/what-are-the-who-air-quality-guidelines>

<sup>2</sup> Para 69. Whatever the reason for selecting 2020 may have been, however, I am satisfied that the department erred in law in selecting so distant a date. The problem of reducing nitrogen dioxide levels was urgent and the plan to do so should have been aimed at **achieving compliance in the shortest possible time, regardless of administrative inconvenience or the costs of making the necessary investigations.** 2/11/2016. <https://www.judiciary.uk/wp-content/uploads/2016/11/clientearth-v-ssenviron-food-rural-affairs-judgment-021116.pdf>

<sup>3</sup> <https://www.gov.uk/government/news/government-ends-support-for-fracking>

<sup>4</sup> <https://www.bbc.co.uk/news/uk-politics-63402777>

<sup>5</sup> [https://www.greatermanchester-ca.gov.uk/media/1995/the\\_minerals\\_plan\\_april\\_2013\\_final.pdf](https://www.greatermanchester-ca.gov.uk/media/1995/the_minerals_plan_april_2013_final.pdf)

<https://greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/>

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<sup>6</sup> Climate Change Committee. Letter: Climate Compatibility of New Oil and Gas Fields  
<https://www.theccc.org.uk/publication/letter-climate-compatibility-of-new-oil-and-gas-fields/>

<sup>7</sup> <https://www.iea.org/news/the-path-to-limiting-global-warming-to-1-5-c-has-narrowed-but-clean-energy-growth-is-keeping-it-open>

<sup>8</sup> <https://takeclimateaction.uk/climate-action/how-reading-uses-planning-deliver-new-zero-carbon-homes>

<sup>9</sup> Council Calls on Developers to Build the Homes Which Reading Needs (25th January 2022).  
<https://media.reading.gov.uk/news/council-calls-on-developers-to-build-the-homes-which-reading-needs>

<sup>10</sup> Oxford City Council presses for zero carbon homes by 2025. <https://www.bbc.co.uk/news/uk-england-oxfordshire-67444842>

<sup>11</sup> [https://assets.ctfassets.net/nv7y93idf4jq/01xbKQQNW0ZYLzYvcj1z7c/4b6804acd572f00d8d728194ef62bb89/Greater\\_Manchester\\_Transport\\_Strategy\\_2040\\_final.pdf](https://assets.ctfassets.net/nv7y93idf4jq/01xbKQQNW0ZYLzYvcj1z7c/4b6804acd572f00d8d728194ef62bb89/Greater_Manchester_Transport_Strategy_2040_final.pdf)

<sup>12</sup> <https://research.manchester.ac.uk/en/publications/quantifying-the-implications-of-the-paris-agreement-for-greater-m> (paragraph 2.5.1)

<sup>13</sup> <https://democracy.manchester.gov.uk/documents/s42846/High%20Speed%20Rail%20%20Northern%20Powerhouse%20Rail%20and%20Network%20North%20Update.pdf>