

Save Greater Manchester's Green Belt Group Response

The [Save Greater Manchester's Green Belt](http://savegmgreenbelt.org.uk/) (SGMGB) group¹ comprises around 40 community groups spread across the Greater Manchester (GM) area. We were formed back in 2016 when around **27,000** GM constituents objected to the proposals for extensive Green Belt release in consultations about the Greater Manchester Combined Authority's Places for Everyone (P4E) Spatial Plan².

Many of our objections related to the enormous impact on health and wellbeing to humans, wildlife and nature, including that caused by air, noise, light and vibration pollution. We work with other local groups, such as [Steady State Manchester](https://steadystatemanchester.net/)³, which has, among many other things, assessed the carbon implications of P4E⁴.

The Spatial Plan mentioned above allocates 2,430 hectares of Green Belt land rather than prioritising brownfield regeneration. This includes peat mosses, Grade 1, 2 and 3a agricultural land, woodland and wetland habitats that will be replaced by housing and warehousing in unsustainable locations, driving up (rather than bringing down) air pollution. Clearly, the local authorities in this area did not have improvement of air quality as one of their key considerations when developing this Plan.

We strongly support the Government's aims to improve air quality but, given air pollution "*continues to be the biggest environmental risk to public health*", we believe this Air Quality Strategy needs to provide more specific and targeted requirements to drive the change needed to improve air quality.

In addition, we believe environmental regulations need to be strengthened further to ensure the importance of improving air quality is fully recognised and that the regulations aiming to decrease pollution and enhance air quality are comprehensively adhered to.

General questions:

1. What is your name?
Marj Powner (Vice Chair)

2. What is your email address?
Marj.powner@gmail.com

3. What is your organisation?
Save Greater Manchester's Green Belt Group

4. Would you like your response to be confidential?
No

¹ <http://savegmgreenbelt.org.uk/>

² <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/submission-documents/>

³ <https://steadystatemanchester.net/>

⁴ <https://steadystatemanchester.net/2023/01/03/places-for-everyone-the-carbon-impact-revised-figures/>

Chapter 1: Introduction No questions.

Chapter 2: How air quality fits with local objectives No questions.

Chapter 3: Air quality standards and objectives No questions.

Chapter 4: Framework for action

5. To what extent do you agree or disagree with our commitment to better align air quality reporting zones with local government boundaries?

Strongly agree

Somewhat agree

Neither agree or disagree

Somewhat disagree

Strongly disagree

Don't know or no opinion

Chapter 5: Summary of powers available to local authorities

6. What more could local authorities do within the existing regulatory framework to reduce pollution from inappropriate domestic burning? Question 12 deals with potential changes to the regulatory framework.

Please provide details.

Communities should be more involved in reducing pollution from inappropriate domestic burning. A detailed communications campaign would be an appropriate start. In addition, community champions could be appointed to support information gathering and distribution. Schools should be more involved, with pupils bringing pressure to parents so they understand the impact of their actions.

Industrial Emissions

7. How do you feel local authorities can most effectively reduce pollution from industrial sources they are responsible for?

Please provide details.

In Greater Manchester, there are concerns about the night-time emissions from various industrial businesses. There are suspicions that inappropriate pollutants are being released under cover of darkness. Monitoring is currently sparse and should be increased significantly. Extensive monitoring in the areas around industrial sites should be a mandated requirement.

Transport

8. How do you feel local authorities can most effectively reduce pollution from transport and non-road mobile machinery (NRMM)?

Please provide details.

Why isn't cleaner construction equipment being mandated, rather than asking local authorities to incentivise? We are concerned about this uninspiring approach. The huge (and negative) impact of air pollution on the health of humans, wildlife and nature appears to be accepted but the actions set out in this strategy will not result in the change necessary to address the problems caused by this blight on our neighbourhoods.

See also our response to question 15.

Agriculture

9. How do you feel local authorities can most effectively reduce pollution from agriculture?
Please provide details

No response

Indoor air quality

10. How do you feel local authorities can most effectively improve indoor air quality?
Please provide details.

Local authorities should provide regular monitoring information about the indoor air quality of public buildings. They should provide air quality monitors to schools, so local measurements can be taken, which will raise awareness and will encourage behaviour changes in households.

Communicating air quality information

11. How do you feel local authorities can most effectively communicate air quality information?
Please provide details.

Local authorities should involve local communities in discussions about the most effective way to distribute information in their locality. Community champions for air pollution should be appointed to support the process.

It is not enough to say that local authorities "*must fulfil their statutory duties to make high quality, accurate air quality information available to the public in a timely fashion*". That information must be accessible to the general public (and those with protected characteristics) online, in local libraries and in other community hubs. All such material should be readable (ie any tables, graphics or maps should be legible when printed on A4).

The information should also be factual, without bias or misleading statements. Public bodies should be held to the same standards in relation to environmental claims as those commercial organisations must adhere to. The Green Claims Code (<https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims>) requires organisations to adhere to the following principles:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated.

These same principles should be set out within this National Air Quality Strategy and should apply to any statement made, or information published, in relation to air pollution.

It is wholly unacceptable for public bodies to publish documents which contain biased, inaccurate or misleading information, about which significant decisions will be made, including those that will negatively impact local residents.

We were astounded to read that last year, you “*expanded this duty to have regard to this Strategy to National Highways*”. We had not realised that such an important Government strategy was restricted in terms of which bodies it applied to.

National Highways is of particular interest given its role appears to be to continue to significantly increase road capacity (rather than to just maintain what we have, to decrease the impact of pollutions and reduce carbon emissions). This emphasis on increasing road capacity will impact further the health of humans, wildlife and nature as the surging volumes of traffic, including HGVs (given the lack of sustainable freight transport options), increases emissions and air, noise, light and vibration pollution.

National Highways should also be communicating the air quality information related to their networks, showing both the national picture and having the ability to drill down to local information. This would require a significant increase in the level of monitoring.

Additional powers & support

12. Do you feel that there are additional powers relating to air quality which should be available to local authorities?

Yes. If yes, please provide details.

No.

Before responding to this specific question, we must point out that this document is confusing. It is not clear which requirements for local authorities are new and which are already in place. It would be helpful if the document showed this information.

The document states “*We have been clear in guidance to local authorities since 2016 that we expect local authorities to use their powers to reduce PM2.5. We still have not seen sufficient action from the majority of local authorities. In light of the new targets, if further action is still insufficient, we will consult on introducing a standalone legal duty on local authorities to take action to reduce PM2.5 emissions*”.

Yet elsewhere, the document suggests “*All English local authorities (including county councils), the Environment Agency, and designated relevant public authorities, must have regard to this Strategy*”.

This is not the same as mandating action. Having regard to means consider. Considering the action points in this strategy will not result in change. Local authorities have limited resources and huge calls on their time. Without explicit instructions, targets and strong, robust wording, air quality improvements will not happen.

There are key weaknesses in this strategy itself. Including case studies, for example, is not the same as directing action with specific outcome requirements.

In terms of additional powers relating to air quality, local authorities should:

- be able to refuse development on the grounds of anticipated pollution impacts to the public, wildlife or nature, (local authorities should not agree to, or be planning for, additional residential sites in areas that have high emissions from industrial or transport sources, for example – see also our response to question 15)
- be able to replicate the low traffic/low pollution conditions experienced during the pandemic (reducing vehicle traffic, increasing sustainable freight/passenger transport and active travel), this may mean reducing vehicle traffic capacity on some roads to encourage use of more sustainable transport options
- issue “on the spot” fines for commercial or domestic pollution offences.

Given that all local authorities are expected to “*take proactive action to improve air quality, whether or not they have an Air Quality Management Area*”, those additional powers should be assigned to enable additional direct actions to improve air quality to be delivered (in addition to the obligations set out elsewhere, the requirement to produce local nature recovery strategies, for example).

The monetised benefits of air quality interventions should be considered alongside other natural capital costs and benefits.

Question 13:

13. What further support could government provide to help with actions taken locally to tackle air quality?

- Increased guidance
 - If so, in which area (please specify)
- Face to face teach ins on topics
 - If so, on which topic (please specify)
- Virtual teach-ins on topics
 - If so, on which topic (please specify)
- Enforcement pro-formas/templates
 - If so, in which area (please specify)
- Sharing space/website for best practice examples of local working
- Knowledge hub inc assets for local authorities
- **Other** (please specify)

The Government should explicitly specify that local authorities should involve their communities in the implementation and achievement of aims to improve air quality.

The Government should also introduce more reporting and targets for local authorities, such as:

- Recording and reporting the number of complaints (formal and informal) about air pollution
- Recording and reporting the number of Freedom of Information Act requests that relate to air pollution
- Recording and reporting the number of claims for compensation in relation to air pollution and how handled.

Each of the above should be presented as trend information, over time, and details of how such trends will be reduced should be included in air quality plans.

In addition, actions to improve air quality should be explicitly reported, including what plans are in place, what the outputs and outcomes demonstrate and best practice to be shared with other authorities.

Given that air pollution has now been identified as a cause of death, it is important that the NHS identifies health incidents and outcomes that are related to air pollution. With this in mind, local health organisations should be required to report the following:

- Number of deaths recording air pollution as a factor
- Number of health incidents due to air pollution, showing how many, by type of incident (eg asthma, stroke, etc)
- Number of adverse health outcomes as a consequence of air pollution (low birth weight, etc).

Figures should be available by age group, by Ward and by air quality monitoring “zone”.

If air pollution is not currently recorded as a cause, the NHS must start identifying this (especially as it has now been specifically identified as a cause of death), as such data may lead to interventions in transport modes, for example, which could significantly reduce the NHS costs.

In the meantime, extending the research by the British Lung Foundation, which compiled emergency hospital admissions data for asthma (<https://statistics.blf.org.uk/asthma>) and COPD (<https://statistics.blf.org.uk/copd>), would provide an indicator of the impact of air quality on health. Up to date trend data, covering at least the last 10 years, should be published in a usable form.

Chapter 6: PM2.5 Target Implementation

14. To what extent do you agree or disagree that a new approach needs to be employed to promote consideration of the PM2.5 targets in the planning system?

- Strongly agree
- Somewhat agree
- Neither agree or disagree
- Somewhat disagree
- Strongly disagree
- Don't know or no opinion
- Please add any additional comments

There is currently insufficient monitoring of PM_{2.5}, which must be addressed as soon as possible. HGVs, for example, are a huge source of PM_{2.5}, yet, even on roads with very high volumes of such traffic, there is no mandated requirement to monitor.

15. What do you think are the merits or drawbacks of a design-stage emission prevention approach as set out in this chapter?

Please provide details.

There appear to be extensive benefits from a design stage emission prevention approach. Local authorities should not be planning to increase air pollution in any area. This should be reflected in local plans and should be explicitly reviewed during the examination process.

Brownfield sites are typically found in sustainable locations, which have access to public transport and active travel options. Conversely, Green Belt sites are typically in unsustainable locations, which need new road capacity to be constructed.

Where promoters are seeking approval for warehousing sites, such sites should not be approved if the only transport option is a road. Such sites should be located near to rail or water-based transport to ensure air pollution is not increased by these businesses.

Local authorities should not be planning additional residential sites in areas that have a high concentration of industrial businesses that are high pollutant emitters.

The pandemic showed us that we can survive without ever increasing road networks. We should be using this experience to redress the balance between sustainable (public transport, rail/water-based freight, active travel) and unsustainable (road vehicles) transport options.

The Government's own documentation (<https://www.gov.uk/government/consultations/draft-revised-national-networks-national-policy-statement>) highlights the volumes and demonstrates the impact that could be achieved by a real focus on modal shift, including, for example:

- *“Every year, road users travel more than 485 billion passenger miles by road in Great Britain, with roads accounting for 84% of passenger miles and 77% of freight by volume” (paragraph 2.5)*
- *“In 2020, 77% of domestic freight moved in the UK by road and 68% of Heavy Goods Vehicle miles were run on the SRN” (paragraph 2.8)*
- Scoping Report (paragraph 5.3) *“There is inequality in exposure with poorer urban communities living close to the SRN particularly affected”*
- Scoping Report (paragraph 4.2.8) *“Air pollution has been identified as a direct threat to biodiversity in England”.*

16. Are there any additional assessment approaches or points we should consider when developing proposals to integrate the PM_{2.5} targets in the planning system?

Yes, please provide details.

No

Local authorities should not be approving planning applications where the only, or the main, transport solution is increasing road capacity. Whilst electric vehicles will reduce some types of pollution, PM_{2.5} will continue to be emitted, particularly where there are large volumes of HGVs.

Consultee Feedback on the Online Survey

17. Overall, how satisfied are you with our online consultation tool?

Please give us any comments you have on the tool, including suggestions on how we could improve it.

Very satisfied

Satisfied

Neither satisfied nor dissatisfied

Dissatisfied

Very dissatisfied

Don't know

The online tool is not a problem but the unreasonably short response time for this consultation is! It does not meet the requirements set out in the Gunning Principles (<https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>).

Given that the Government recognises that there is more to do to protect people and the environment from the effects of air pollution, and that you would welcome responses from all other interested parties and the wider public, such a short deadline is wholly irrational, especially as the consultation was launched during the Easter holidays.

It is also hard to understand how “conscientious consideration” can be given to the responses when there is only one week between the deadline for responses and the date by which the final AQS is required to be published (which we understand is 1 May).