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16<sup>th</sup> December 2020

Dear Andy,

### **A57 Link Roads Project - statutory consultation**

- 1 We write to register our strong objection to the A57 Link Roads Project. We remain fully supportive of finding a solution to the traffic conditions on the A628T road corridor between the M67 and the M1 but this is not it. The A57 Link Roads Project relieves only parts of Mottram and does not address the congestion and environmental pollution along the trunk route or throughout Glossopdale. The fundamental failure of the appraisal process in the Trans-Pennine Feasibility Study, of which this scheme is one output, further challenges its validity.
- 2 Of equal concern is that Highways England does not appear to have taken account of the dramatic way in which the world has changed since it presented its 2018 scheme. The Climate Change Act 2008 was amended in 2019 to meet net zero greenhouse gas emissions by 2050, making it paramount that carbon emissions are reduced. Changes to travel and work patterns induced by the Covid-19 pandemic are likely to be sustained in the long term, leading to more home working and flexi-time travel. **In this context we strongly reject this outdated proposal and urge Highways England and the local authorities to pursue sustainable ways for people to travel.**

### **Scheme development**

- 3 This scheme resulted from the 2015 Trans-Pennine Feasibility Study, the aim of which was to reduce a congestion hotspot. There was no strategic case for the scheme and no objectives linking the proposal to government strategic policy priorities such as reducing climate emissions, or increasing modal shift to active

travel and public transport<sup>1</sup>. With the lack of a strategic direction ‘baked into’ the appraisal process the narrow focus of the study led it to concentrate options on new road infrastructure for car and lorry travel. In addition the webTAG key principles<sup>2</sup> were not followed, as we stated in our letter of 26 August 2014 and the MTRU report, and alternatives were not robustly tested as is required by the test of major development in a National Park<sup>3</sup>. In the context of the Treasury’s recent review of its Green Book<sup>4</sup> the scheme’s appraisal does not withstand scrutiny, as we showed in our letters of 8 May 2014 and 26 August 2014 to the Department for Transport. The current scheme should be withdrawn and the transport issues in the area should be subject to the improved appraisal process in the revised Green Book. We have written about this issue in more detail to the relevant Minister (attached email).

### **Statutory Consultation**

- 4 Early in the consultation we informed Highways England of our concerns about holding a statutory consultation on a major development during national restrictions to address the Covid pandemic. We will be making these concerns known to the local authorities and the Planning Inspectorate at the appropriate time.
- 5 As with the 2018 consultation, the Preliminary Environmental Information Report (PEIR) appears to be work in progress. There is no transport assessment or traffic modelling results, and the full appraisal of the impacts of the scheme on cultural heritage, landscape, biodiversity, noise and vibration, air quality, carbon emissions and road drainage and the water environment are missing. Neither the public nor the statutory consultees have the information available to them to make an informed response.

### **Scheme objectives**

- 6 No evidence has been supplied to show the scheme objectives (connectivity, environmental, societal, capacity) would be met. The objectives could all be met by demand management of traffic and promoting sustainable travel choices. Cars are greedy for space compared to buses and bikes, undermine active travel and public transport, and push up carbon emissions. They should not be considered the default travel option - one in two Gamesley households and a third of Hadfield

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<sup>1</sup> National Policy Statement for National Networks 2014 paras 3.15-3.22; our letters to DfT

<sup>2</sup> webTAG Transport Analysis Guidance - The Transport Appraisal Process, Guidance for the Technical Project Manager, Jan 2014, para 1.1.5

<sup>3</sup> National Policy Statement for National Networks 2014 para 5.147

<sup>4</sup> Green Book Final Review 35<sup>th</sup> Nov 2020; Green Book 2020

households have no access to a car (Census 2011). The solution is to ban through traffic of heavy lorries across the National Park, free up road space for walking, cycling<sup>5</sup>, bus and coach, and improve bus and rail services. The focus for improving trans-Pennine connectivity for both passengers and freight should be rail. Recent analysis by Transport for the North suggested that a mix of active travel, increased use of public transport and more remote working would reduce car-kms by between 12 and 22%<sup>6</sup>.

### Scoping Report

- 7 Highways England is relying on the 2017 Environmental Scoping Report prepared for the 2018 Trans-Pennine Upgrade and the 2017 Planning Inspectorate's Scoping Opinion of that report. In that Scoping Opinion (2.3.16) the Planning Inspectorate advised that *'if the Proposed Development changes substantially during the EIA process and prior to submission of the DCO application the Applicant may wish to consider requesting a new scoping opinion.'* The proposed development has changed enough to require a second statutory consultation, yet Highways England does not appear to have requested a new scoping opinion.
  
- 8 We have tried to assess to what degree the PEIR reflects the 2017 scoping opinion. It would have helped if Highways England had followed the Planning Inspectorate's advice (Scoping Opinion 3.3.1) and used tables to demonstrate how the assessment has taken account of the Scoping Opinion. Whilst some issues have been addressed it appears to us that the following points remain outstanding:
  - description of the scheme (use of the terms 'construction study boundary'/'scheme boundary');
  - lack of a Historic Landscape Character Assessment;
  - impacts on the setting of the Melandra scheduled monument;
  - landscape impacts of traffic increases on roads through the National Park and on views from Tintwistle Low Moor;
  - impact on national trails crossing the A628T and A57 in the National Park;
  - justification for exclusion of PM2.5, as proposed by Public Health England;
  - omission of the Langsett AQMA. *'The study area should be sufficient to consider consequential effects during operation, e.g. such as increases in traffic on the A616, A628 (including in the village of Tintwistle) and the AQMA at Langsett due to the enhanced attractiveness of the route to Users'*.

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<sup>5</sup> As promoted by the UK Government 2020 <https://www.gov.uk/government/publications/reallocating-road-space-in-response-to-covid-19-statutory-guidance-for-local-authorities/traffic-management-act-2004-network-management-in-response-to-covid-19>

<sup>6</sup> TfN Response to DfT Decarbonising Transport - Setting the Challenge, para 4.1, Aug 2020  
<https://democracy.transportfornorth.com/ieListDocuments.aspx?CId=155&Mid=178&Ver=4>

### Design of the scheme

- 9 As we have argued above, the Trans-Pennine Feasibility Study 2015 which concluded that this scheme should be progressed (PEIR Vol 1 para 3.1) was deeply flawed. Hence the premise on which this scheme is founded is unsound.
- 10 A motorway-style road, with noisy and polluting traffic would spoil the countryside and landscapes around Mottram (PEIR Vol 1 Table 7-4), and people's enjoyment of them and their wildlife. Both the dual and the single carriageways would be raised on embankments either side of the underpass and, with their traffic, would dominate the landscape, harm visual amenity in near and distant views, impact adversely on the Roman fort Melandra and the setting of listed buildings, distribute noise and air pollution widely, fragment habitats and impact negatively on wildlife. No details are provided of the safety measures and improvements to be applied to the de-trunked section of the A57 and to Woolley Lane as these have yet to be agreed with Tameside Council.
- 11 The proposals would not solve the traffic congestion and environmental pollution along the trunk road corridor or in Glossopdale. Parts of Mottram would be relieved of traffic but other parts would be subject to the impacts of its displacement to the north of the village. The traffic jam at Mottram lights would move further east down Mottram Moor to a 'super junction', wholly out of keeping with the townscape. The new junction at Brookfield would lead to an increase in traffic on the A57 with traffic backing up into Glossop as people head for Manchester or backing up onto the A57 link road as people return to Glossop. There is no evidence that the scheme would improve the reliability of local journeys or of those between the Manchester and Sheffield city regions.
- 12 The proposed segregated cycling routes on the single carriageway link road are tokenism. Although the routes would link in with the Trans Pennine Trail and '*cyclists can make their way across the network alongside rivers and canals through the Pennines,*' they do not address the need for a network of cycleways and footways that would allow local people to make safe journeys to meet their everyday needs.
- 13 Finally, the piecemeal approach to developing the trans-Pennine road corridor through the 2016 Trans-Pennine Tunnel Study<sup>7</sup> is unacceptable. To claim that the scheme is being designed to avoid unacceptable impacts on the natural

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<sup>7</sup> Trans-Pennine Tunnel Study Stage 3 Report 2016

environment and landscape in the Peak District National Park is grossly misleading. The proposed link roads, which would lie in the setting of the National Park, would be the first leg in a new expressway/‘bypass of the M62’ across the Park. Despite a short tunnel, the planned extension of the motorway network is largely out in the open and would devastate National Park landscapes, filling Longdendale with traffic. The trans-Pennine Tunnel shares a common origin with the A57 Link Roads from the 2015 Trans-Pennine Feasibility Study. The equally poorly appraised Trans-Pennine Tunnel is also encumbered by the same poverty of strategic objectives. It sought its justification for a new strategic road link from Road Investment Strategy 1 and in the context of a narrow economic objective. It too should be re-evaluated through the revised Green Book methodology. The upgrade also contravenes national policy. There is a strong presumption against any significant road widening or the building of new roads in a National Park, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly<sup>8</sup>. Planning of the Strategic Road Network should encourage routes that avoid National Parks, the Broads and Areas of Outstanding Natural Beauty.

### Traffic increases

- 14 A transport assessment with traffic flows is essential to understanding the impacts of the scheme on people and the environment. Despite repeated requests and past promises<sup>9</sup> to supply traffic figures, none have been provided in the PEIR although the ‘*data is available*’ (PEIR Vol 1 11.5.1). However, Highways England states ‘*The current Scheme is not considered to be environmentally different, in terms of predicted effects, to the scheme which was subject to the scoping opinion and therefore it is appropriate to base the ES on the previous scoping opinion*’ (PEIR Vol 1 para 4.15.6). We have therefore used the traffic flows available from the 2018 consultation to inform our comments. Percentage traffic increases quoted in PEIR Vol 1 Table 11-13 closely match these 2018 figures.
  
- 15 Traffic increases by between 30-50% on the M67, increasing congestion at its junction with the M60. On Market Street, an increase of 130% challenges the conclusion that even the bypassed parts of Mottram would benefit. Hollingworth and Tintwistle would experience an increase of 7%, leaving these villages congested and still enduring their current severance; if traffic is moving faster, road crossings would become more dangerous. A 30% increase in traffic on the A57

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<sup>8</sup> National Policy Statement for National Networks 2014 para 5.147; Peak District National Park Authority’s Core Strategy (adopted 2011)

<sup>9</sup> Trans-Pennine team email to CPRE PDSY March 2019

at Dinting Glossopdale would worsen congestion on the single route in and out of the dale and lead to continuing rat running on residential and rural roads.

- 16 The trunk route would be more attractive to through traffic which would increase on the A628T by at least 7% and on the A57, a '*persistently high risk rural road*' for fatal and serious crashes (EuroRAP 2018<sup>10</sup>), by at least 27%. As both these roads cross the National Park where there is a presumption for reduction of traffic impacts and removal of cross-Park traffic<sup>11</sup>, such traffic increases are unacceptable. They would impact adversely on the Tintwistle Conservation Area, on quiet enjoyment of visitors, on the safety of all users, and on designated European sites. Roadkill of the species these sites support, such as breeding moorland birds and mountain hares, would increase. Furthermore, any statutory undertaker (such as Highways England) commissioning or undertaking works in relation to, or so as to affect land in a National Park, must comply with the duty to have regard to National Park purposes<sup>12</sup>.
- 17 As new roads induce traffic generation well above modelled forecasts, up to 47%<sup>13</sup>, all these flows are likely to be underestimates. Even the percentage increases quoted in the PEIR contravene relevant policies. The local and combined authorities impacted by this scheme seek substantial reductions in car and freight journeys. Greater Manchester<sup>14</sup> aims to increase the proportion of trips by sustainable modes with a 25% reduction in passenger distance travelled by 2035; and to decarbonise freight transport, delivering a shift away from road freight of 50%. Sheffield City Region's Climate Emergency Framework<sup>15</sup> aims to reduce total travel demand by 25% by 2030; to reduce car miles by 25% by 2040; and to reduce freight miles by 30% by 2040. Derbyshire's Local Transport Plan 3 (2011-2026) aims to make best use of existing road infrastructure and restrain car use in favour of smarter travel choices.

## PEIR

- 18 Highways England is required under its licence (April 2015) paragraph 4.2g to '*Minimise the environmental impacts of operating, maintaining and improving its*

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<sup>10</sup> <https://www.arcgis.com/apps/MapSeries/index.html?appid=8184fb08fe5940dd81d5750989321501>

<sup>11</sup> National Policy Statement for National Networks 2014 para 5.147; English National Parks and the Broads, UK Government Vision and Circular 2010 Defra; Peak District National Park Authority Core Strategy (2011)

<sup>12</sup> section 11A of the National Parks and Access to Countryside Act 1949; section 85 of the Countryside and Rights of Way Act 2000; National Policy Statement for National Networks 2014 para 5.148.

<sup>13</sup> The End of the Road? Challenging the road building consensus - Report for CPRE, March 2017, Sloman et al

<sup>14</sup> Greater Manchester's Springboard to a Green City Region approved by GMCA July 2018 <https://aboutmanchester.co.uk/a-springboard-for-a-green-greater-manchester/>

<sup>15</sup> SCRCA Board meeting 27 Jan 2020 Item 12

<https://moderngov.sheffieldcityregion.org.uk/ieListDocuments.aspx?CId=137&MId=238&Ver=4>

*network and seek to protect and enhance the quality of the surrounding environment*'. In addition to what we have said above, the following are examples of where we believe it fails in this duty.

### ***Climate Emergency***

- 19 Interim results for the carbon emissions are given in PEIR Vol 1 Ch 14 Table 14.2 and Table 14.3. 'At least' 31,286 tCO<sub>2</sub>e (para 14.7.1) would be emitted by the construction phase. In the operational phase in its opening year 2025 the scheme would generate an additional 9,684 tCO<sub>2</sub>e, compared to without the scheme, rising to an additional 10,862 tCO<sub>2</sub>e in 2040.
- 20 Pro-rating the emissions between 2025 and 2040 we estimate that between 2025 and 2032 (end of the 5th carbon budget) total construction and operational emissions will be 110,757tCO<sub>2</sub>e. If this were wholly accounted for in Tameside it would use up a significant proportion, c.9%, of Tameside's transport carbon budget to the end of 2032<sup>16</sup>. Increasing carbon emissions conflicts with the aim of all of the local and combined authorities impacted by the scheme to achieve net zero carbon by 2040 or earlier - Greater Manchester Combined Authority by 2038; South Yorkshire by 2040; and West Yorkshire by 2030. Surface transport is the largest-emitting sector in the UK, accounting for 22% of the UK's 2019 emissions<sup>17</sup> with cars accounting for the majority of them. Even with a shift to electric vehicles, the level of reduced car mileage needed to meet the UK carbon budget by 2030 is estimated to be between 20% and 60%, depending on the speed of the switch to electric vehicles and how fast the electricity powering them is decarbonised<sup>18</sup> (an estimate made before the Climate Change Act 2008 was amended to Net Zero 2050 and the Prime Minister tightened the target to reduce emissions from 61% to 68% by 2030, based on 1990 levels<sup>19</sup>).
- 21 Most recently the Committee on Climate Change's 6th carbon budget published on 9<sup>th</sup> December requires that emissions from surface transport (majority road) decrease between 2025-40 from 92m to 12m tonnes - a reduction of 87%<sup>20</sup>. By contrast the A57 Link Roads would increase annual emissions by 9% (from 761,085tCO<sub>2</sub>e in 2025 to 829,455tCO<sub>2</sub>e in 2040). We have asked Highways England

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<sup>16</sup> <https://carbonbudget.manchester.ac.uk/reports/E08000008/>

<sup>17</sup> The Sixth Carbon Budget, The UK's Path to Net Zero, Committee on Climate Change, 9<sup>th</sup> Dec 2020, p29

<sup>18</sup> More than electric cars, FoE, Feb 2019 <https://policy.friendsoftheearth.uk/insight/more-electric-cars>

<sup>19</sup> <https://www.legislation.gov.uk/ukxi/2019/1056/contents/made> 26 June 2019; <https://www.bbc.co.uk/news/science-environment-55179008> 4th Dec 2020

<sup>20</sup> Sixth Carbon Budget charts and data in the report Advice Report Ch1&2 tab, row 238.

for its assumptions regarding its measurement of carbon emissions<sup>21</sup> but have yet to receive an answer. Consequently we do not understand how, instead of a 9% increase, an 87% reduction in emissions would be achieved with this scheme.

22 The 2014 National Networks National Policy Statement is not a sound policy from which to dismiss the increased carbon emissions. In isolation the emissions may have an insignificant impact on the UK's carbon budget but cumulatively, with the rest of the strategic and local roads' programme, the impact would be severe and negative. Furthermore, that policy statement is outdated as it precedes the 2019 amendment to the Climate Change Act 2008 to achieve net zero greenhouse gases by 2050. The Committee on Climate Change has stated the UK is not making adequate progress towards that 2050 target<sup>22</sup>. It *'recommended that investments in low-carbon and climate adaptation infrastructure must be at the heart of measures to restore economic growth following COVID-19' ... 'Higher investment in resilient digital technology including 5G and fibre broadband should therefore be prioritised over strengthening the roads network.'* It repeated that shared mobility and a focus on broadband rather than road-building are key enablers for reducing emissions in the transport sector<sup>23</sup>.

23 In that context Highways England should be reducing, not increasing, carbon emissions. In order to achieve that, provision must be made for door-to-door journeys by sustainable alternatives that offer attractive, affordable, safe and convenient options to the private car<sup>24</sup>. As the NPPF states: *'Priority should be given first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second ... to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use'*<sup>25</sup>. This approach is supported by all of the local and combined authorities impacted by the scheme.

### ***Air pollution***

24 Air pollution would continue. Highways England's modelling of local air quality with the link roads in place shows that annual mean NO<sub>2</sub> concentrations would still be well above the legal limit for 33 receptors on Mottram Moor, in Dinting and along the A628 in Hollingworth (PEIR Vol 2 Table B-4). Action to alleviate the two

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<sup>21</sup> Email 24 November 2020

<sup>22</sup> Reducing UK Emissions Progress Report to Parliament, Committee on Climate Change, June 2020

<sup>23</sup> The Sixth Carbon Budget, Surface Transport Committee on Climate Change, 9<sup>th</sup> Dec 2020, p46

<sup>24</sup> National Networks National Policy Statement 2014, para 3.15

<sup>25</sup> NPPF 2018 para 110



AQMAs in Tintwistle and Dinting would be compromised. *‘Air quality considerations are likely to be particularly relevant where schemes are proposed: within or adjacent to AQMAs; roads identified as being above Limit Values or nature conservation sites; and where changes are sufficient to bring about the need for a new AQMA or change the size of an existing AQMA; or bring about changes to exceedances of the Limit Values, or where they may have the potential to impact on nature conservation sites’.*<sup>26</sup> Although it may be the responsibility of local authorities to manage air pollution it is unreasonable that Highways England is not pursuing alternatives that have the potential to eliminate it.

- 25 Long-term exposure to air pollution in the UK has an annual impact on shortening lifespans, equivalent to 28,000 to 36,000 deaths<sup>27</sup>. When all diseases are included, air pollution is expected to cause 2.4 million new cases of disease in England between now and 2035. Small particulates (PM<sub>2.5</sub>) alone could be responsible for around 350,000 cases of coronary heart disease and 44,000 cases of lung cancer in England over that time. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement<sup>28</sup>. Greater Manchester, Sheffield City Region, High Peak Borough Council and Derbyshire County Council all place a high priority on reducing air pollution to below legal limits<sup>29</sup>.

### **Noise**

- 26 Instead of reducing noise pollution in the area, the scheme redistributes it from those living alongside the A57T and Woolley Lane to those near to the new roads (PEIR Vol 1 Table 11-13). Some receptors would experience levels above which significant adverse effects on health and quality of life occur - the Significant Observed Adverse Effect Level. Such noise would also be detrimental to local wildlife. The Noise Policy Statement for England 2010 requires development to improve health and quality of life through the pro-active management of noise while also taking into account the guiding principles of sustainable development.

### **Flood Risk**

- 27 At its junction with the A57 at Brookfield the new single carriageway would cross the River Etherow in Flood Zones 2 and 3. In this situation an appropriate Flood

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<sup>26</sup> National Networks National Policy Statement 2014, para 5.11

<sup>27</sup> Clean Air Strategy 2019 Defra

<sup>28</sup> NPPF 2018 para 181

<sup>29</sup> Greater Manchester CA Transport Strategy 2040 & 5-year Environmental Strategy 2019-2024; Sheffield City Region Transport Plan; High Peak Local Plan 2016 Policy EQ1; DCC LTP 2011-2026

Risk Assessment and application of the Sequential Test is required<sup>30</sup>. For transport infrastructure crossing Flood Zone 3 an exception test is required<sup>31</sup>. To pass that test the development must provide wider sustainability benefits to the community that outweigh the flood risk; and the development must be safe for its lifetime, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. There is no evidence that the scheme meets these tests.

Yours sincerely

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<sup>30</sup> National Policy Statement for National Networks 2014 5.98

<sup>31</sup> <https://www.gov.uk/guidance/flood-risk-and-coastal-change#Table-2-Flood-Risk-Vulnerability-Classification>