

## **Highways England Trans-Pennine Upgrade consultation ~ response from Campaign for Better Transport**

**March 2018**

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment. We welcome the opportunity to respond to the latest proposals for the Trans-Pennine Upgrade.

### **Summary**

We formally object to the proposals to build the Mottram Moor link road and new A57 (T) to A57 link road. We fear these plans will only serve to increase traffic on the road network, while providing at best temporary relief to current problems.

While any traffic benefit will be temporary, the adverse environmental impacts will be lasting. New road building in and around protected landscapes should be a last resort.

The focus on road building alone is a missed opportunity to provide a sustainable solution to the transport challenges in this corridor. We would prefer to see a package of measures that would prioritise sustainable transport and protect the Peak District National Park.

We have no objection to safety and technology improvements along the route and at the Westwood roundabout, but request that these are sensitively designed to minimise visual intrusion and light pollution.

We are concerned at the lack of options being put forward for a multi-modal approach, based on sustainable transport, and do not believe that the proposed enhancements for non-motorised users, although welcome if properly designed, are sufficient to justify the new roads.

We believe that the impact of new road building on the protected landscape, and the lack of any long-term benefit, combined with damage to important habitats, increased air and noise pollution combine to provide clear grounds to reject these road plans.

## Consultation response

The proposals would see the construction of three major new roads and associated junctions: a new dual carriageway from the M67 junction 4 roundabout to a new junction on A57(T) Mottram Moor; a new single carriageway connecting to the A6018 Roe Cross Road; and a new single carriageway A57(T) to A57 link road with a new junction on the A57 on Woolley Bridge, as well as increased capacity at the existing A616/A61(T) Westwood roundabout.

We formally object to these proposals which will do nothing to reduce traffic, will permanently damage the Peak District National Park, will undermine statutory targets on reducing CO2 emissions and air pollution and which fall far short of offering the integrated multi-modal options that would provide a sustainable solution to the area's transport challenges.

Without a significant and comprehensive investment in sustainable transport, which is not evident from these plans, traffic levels will worsen, air pollution and carbon emissions will not be reduced and quality of the natural environment will be permanently eroded.

## Increased traffic

New road building will not solve the problems of excessive traffic and in fact will add to traffic levels and congestion in the local area and on the network as a whole.

Providing new road capacity can only be a temporary solution to congestion. The phenomenon of induced traffic is well-established. This has been seen for example at the Dartford Crossing in Kent, where repeated increases in capacity have been overwhelmed by growing demand. Highways England report *"Analysis of traffic data shows that traffic demand at Dartford has responded in step with capacity; such that whenever new capacity has been provided, it has filled up and created the need for more capacity. This has been a recurring pattern since the second tunnel was opened at Dartford in 1980 and then the QEII Bridge in 1991. Today there is insufficient capacity to cater for current and future traffic demand."*<sup>1</sup>

The evidence from official POPE reports of major roads confirms that major new roads increase traffic above the general traffic increases for their areas, with traffic increases of up to 47% over 20 years, and that the promised safety and economic benefits from new roads fail to deliver in practice.<sup>2</sup>

The majority of the traffic on the A57T is locally generated from Glossop, Hadfield and Padfield and will not benefit from local bypasses or long-distance strategic routes. Adding new roads, and therefore new traffic, to the network is likely worsen existing traffic problems across the area, with adverse impacts on locations including the A57 Snake Pass, on Langsett at the east end of the A628 and through Glossop.

If a failure to invest sufficiently in sustainable measures is compounded by building major new roads, then traffic congestion on the wider network risks getting worse, adversely affecting local businesses, the responsiveness of emergency services and general network resilience.

## Impact on Peak District National Park

The proposals go against the basic principles of good planning by increasing road building in and around the Peak District National Park. The Preliminary Environmental Information Report recognises that these roads lie in the National Park setting and that there will be traffic increases on roads within the National Park.

We are also concerned that they will pave the way for further road building in the park including Hollingworth-Tintwistle bypass and dualling the entire A628 corridor across the Park. The cumulative impact of these schemes is likely to be far greater than the sum of each scheme's impacts. Therefore, there is a need to consider more thoroughly the wider impacts and implications of proceeding with this proposal.

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<sup>1</sup> Highways England "Lower Thames Crossing Pre-Consultation Scheme Assessment Report" 2015

<sup>2</sup> TfQL "The Impact of Road Projects in England" March 2017

The National Planning Policy Framework (NPPF) is clear that major development in National Parks should take place only in exceptional circumstances<sup>3</sup>, and we do not believe that this case has been made for these new roads.

Instead, we strongly support the recent call by Campaign for National Parks for greater use of smart travel planning and better public transport, alongside measures which discourage car use, such as road pricing and parking charges, to improve access to National Parks while reducing overall traffic impacts.

An approach based on demand management and sustainable modes would sit far more comfortably with the NPPF which advocates that *“economic, social and environmental gains should be sought jointly and simultaneously through the planning system”*.

We remain firmly opposed to any new road building around the Peak District, which should only be considered as a last resort.

### **Adverse environmental impact**

The higher traffic volumes and encouragement of car use arising from new road capacity would be at odds with other key public policy priorities. The UK has a binding target of an 80% CO2 emissions reduction by 2050 and reducing transport emissions is key to achieving this and it is questionable whether these emissions can be reduced quickly enough through a move to low and zero emission vehicles alone.

The 2017 Report to Parliament from the UK Committee on Climate Change noted that carbon dioxide emissions from transport have increased 0.9 per cent from 2015 to 2016, the third successive year that emissions have risen. The Committee advises that this trend needs to be reversed, as a matter of urgency, to deliver a reduction in emissions of 44 per cent from 2016 to 2030<sup>4</sup>.

The UK Government has been found to be in unlawful breach of air quality standards with local authorities required to implement action plans to reduce air pollution. The major source of NOx and particulates is emissions from diesel engines. The level of breaches of vehicle emissions regulations means that air pollution baseline assumptions are meaningless. New research has found that not one single brand complies with the latest air pollution limits (‘Euro 6’) for diesel cars and vans in real-world driving conditions.<sup>5</sup>

Local authorities along the routes where traffic will increase if this road corridor is expanded are among those identified as having illegal air quality requiring urgent action (including Tameside, Stockport, Oldham, Manchester, Sheffield and Leeds). Even a marginal increase in traffic levels as a result of the new roads proposed will adversely impact local air quality and contribute to worsening air quality in communities across the network.

The adverse impacts of roads on the landscape and the natural environment are well-known. It is vital that any road proposals fully evaluate their impact and draw up detailed proposals for mitigation in order for an informed decision to be made.

We share concerns raised by other NGOs that final traffic data, air quality, carbon emissions, noise and flood risk assessments for these proposals are not available. In addition, the landscape assessment has not been done in the winter months, the approach towards the Habitats Regulation Assessment is unclear, and ground surveys are still ongoing.

This makes it impossible to form a detailed judgement on the proposed scheme, beyond expressing general concern that there will inevitably be an increase in noise, air and light pollution; a loss of natural habitats; increased severance; and a general erosion of landscape value and environmental quality.

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<sup>3</sup> Paragraph 116, National Planning Policy Framework

<sup>4</sup> UK Committee for Climate Change – [2017 Report to Government](#)

<sup>5</sup> Transport & Environment: [“Dieselgate: Who? What? How?”](#) September 2016

## **Lack of an integrated approach**

The wider goal of these proposals is not to benefit the local area but to increase road capacity for Trans-Pennine journeys connecting cities across the region. Attracting more road traffic into the centres of Manchester, Sheffield and Leeds will undermine those cities' long-term plans to cut traffic and tackle air quality. A better solution would be to invest in sustainable transport such as Trans-Pennine rail, moving people and goods in way that connects cities efficiently, supporting economic development without wider environmental damage.

The proposals, while including some welcome measures for non-motorised users, fall far short of offering the integrated multi-modal options that would provide a sustainable solution to the area's transport challenges. A package of traffic demand measures, including speed restrictions, should be implemented before contemplating any new road capacity.

The area could benefit significantly from improved rail links for both passengers and freight as well as upgraded bus services linking local communities. Investment in buses boosts access to jobs and services, and supports the visitor economy: it also contributes to network capacity and resilience by cutting traffic, with each double decker bus replacing up to 200 vehicles on the road.

## **Safety and technology improvements**

The proposals also include safety and technology improvements such as safety measures focused on addressing collision hotspots and the provision of electronic message signs.

We have no objection to safety and technology improvements along the route and at the Westwood roundabout, but request that these are sensitively designed to minimise visual intrusion and light pollution, and to reflect the needs of all road users, not only motorists.

## **Facilities for cyclists, pedestrians, equestrians and walkers**

We welcome provision of improved facilities for non-motorised users alongside and crossing the Strategic Road Network and other roads. Any such provision should be to the highest standards, with cycle provision designed to comply with the latest advice in the Design Manual for Roads and Bridges<sup>6</sup> and new or improved crossing points located to reflect users' desire lines.

However, we believe such improvements could and should be delivered as part of a programme of improvements to the existing network, rather than as an add-on to a damaging new road building scheme. This would reflect the Government's commitment to promote cycling and walking as "the natural choice for shorter journeys or as part of a longer journey".<sup>7</sup>

Should the new road go ahead despite our objections, we would expect Highways England to deliver these improvements at the earliest opportunity, not as a post-opening legacy from the new road.

## **Reinstated land above Mottram underpass**

We note that the proposals will mean demolishing local properties and a permanent loss of some agricultural land.

Tameside's Strategic Housing Market Assessment (SHMA) reports that the total housing requirement for Tameside to deliver between 2011 and 2026 is 12,661 additional dwelling units.<sup>8</sup> Losing any housing is clearly undermining this important local priority. It is hard to see how the provision of some new open space above the underpass will compensate for this irremediable loss.

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<sup>6</sup> Design Manual for Roads and Bridges, Interim Advice Note 195/16

<sup>7</sup> Department for Transport: "Cycling & Walking Investment Strategy" 2017

<sup>8</sup> Tameside Borough Council: "[Review of housing needs in Tameside](#)" October 2012

## **Improvements on existing roads**

We note the proposals to de-trunk a section of the existing A57(T) Hyde Road should the new road go ahead. We welcome the proposed improvements to local cycle routes, crossing facilities and consideration of a 20mph limit. We would like to see such measures applied wherever possible to the current road system. This would not only make the network safer, but would be a positive way to increase network capacity through speed reduction rather than new construction.

However, we do not see these as justification for building major new roads. The evidence is that new roads create new traffic on new and existing roads, permanently undermining the temporary benefit of any traffic reduction to nearby communities.

Should the new road go ahead despite our objections, we would expect Highways England to deliver traffic calming improvements to the existing road at the earliest opportunity, not as a post-opening legacy from the new road.

March 2018

Bridget Fox

Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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