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Pennine Highway Upgrade

Date: 22 March 2018

Dear Ms Griffiths,

**TRANS-PENNINE HIGHWAY UPGRADE 2018: PUBLIC CONSULTATION
STATUTORY CONSULTATION: 12 FEBRUARY TO 25 MARCH 2018
PLANNING ACT 2008**

The statement below is submitted to Highways England jointly by Derbyshire County Council (DCC) and High Peak Borough Council (HPBC).

Member Comments

Representatives of Highways England attended a meeting of HPBC's Economy and Growth Select Committee on 8 February 2018 to provide members with an update on the Trans-Pennine upgrade.

The following comments were made in respect of the scheme:

- A628 – members expressed regret that the preferred route did not include the climbing lanes on the A628, which, in their view, would have assisted with speeding up traffic flow on the road. It was noted that the inclusion of the climbing lanes was still being considered and may form part of a future announcement, which would be welcomed.
- M67 roundabout – the potential for there still to be long queues at the end of the M67 once the new A57 link road was constructed was discussed, and members noted proposals to discourage use of the existing A57 via the use of speed humps, signals on the existing roundabout, chicanes and the re-prioritisation of signals at the junction in Mottram.

- New A57 junction at Brookfield – concerns were expressed that the proposals could lead to an increase of traffic on the A57 and that traffic could be backed up past the traffic lights at Glossop Caravans to turn left up the new link road. It was noted that extensive modelling was on-going and that solutions within the wider community were being sought.

HPBC's members of the Economy and Growth Select Committee noted the next stages in the process, and sought assurances that the project would progress.

DCC members with electoral divisions in High Peak Borough have been consulted on the proposals. At the time of writing, however, no comments have been received. Any member comments subsequently received will be forwarded to you for you information.

Officer Comments

Thank you for consulting DCC and HPBC on the Trans-Pennine Highway Upgrade Public Consultation (TPHUPC). In addition to the member feedback highlighted above, the Councils have additional matters to raise in response to the consultation.

In terms of the policy context for the scheme and development in the Glossop area, the High Peak Local Plan was adopted in April 2016. Glossop is identified in the Local Plan as one of three Market Towns in the Borough which are essential to the areas in terms of the provision of housing and employment growth and the provision of services and infrastructure to local communities.

Policy SS5 (Glossopdale Sub-Area Strategy) includes the policy of enabling enhancements to key community services and infrastructure and connectivity to meet the needs of the local population and support growth in Glossopdale through a number of means, including working with partners to address congestion on the A57 and A628 to enable transport improvements and mitigation measures as identified in the Trans-Pennine Feasibility Study "subject to further consideration". Consequently, we are keen to continue to work with you to identify and address the impacts of the scheme and to maximise potential benefits for the area.

In this context, DCC and HPBC welcome the opportunity to comment on the TPHUPC, the primary focus for which is the Preliminary Environmental Information Report (PEIR) that has been published by Highways England as part of the consultation supporting documentation.

It is noted that the PEIR considers the potential social, economic and environmental impacts of the two associated highway schemes as set out below, which have been combined and assessed as one scheme (hereafter referred to as 'the Scheme') for the purposes of the forthcoming Development Consent Order (DCO) application.

Mottram Moor Link Road Scheme; and
A57 (T) to A57 Link Road Scheme

Section 2.4 and Appendix B of the PIER set out details of the Scheme's alignment from which it is clear that much of the Scheme would be in Tameside Borough apart from the section of the A57 (T) to A57 Link Road east of the River Etherow at Woolley Bridge. A new bridge structure would be constructed to carry the Scheme over the River Etherow. The route would then terminate to a new signal controlled 'T' junction at Woolley Bridge, known as Brookfield Junction. Consequently only a relatively small section of the Scheme would be in located Derbyshire.

DCC and HPBC fully recognise the severe impacts of existing traffic flows on the highway network on the A628 and A57 and the associated adverse implications for the residents of Woolley Bridge in Derbyshire and Mottram Moor in Tameside and the wish for Highways England to address these issues. However, the Councils are also concerned about the wider impacts of the Scheme on the highways network, particularly on the A57 through Glossop and A628 through Tintwistle. This is because the Scheme and its likely improvements to connectivity and reduction in travel times to and from the Manchester conurbation could potentially make it more attractive to road users in Derbyshire and consequently increase traffic flows on both the A57 through Glossop and A628 through Tintwistle to access the Scheme.

In this respect, DCC and HPBC express significant concerns about the lack of supporting evidence and information in the PEIR on the potential highways impacts of the Scheme. DCC understands through its on-going discussions with Highways England that comprehensive traffic modelling works are currently being undertaken by Arcadis on its behalf but that the outcomes of this modelling work will not be completed until the end of April 2018.

Clearly, there will inevitably be wider impacts of the Scheme that extend well beyond the red line boundary identified in Appendix B of the PEIR relating to traffic flows and how they impact on air quality, noise and vibration and people and communities etc., which are key environment topics covered in the PEIR. However, in the absence of a transportation assessment or indeed any substantive traffic flow information within the PEIR, it is difficult for the Councils, and indeed other stakeholders, to make an objective assessment of the effects of the Scheme. Key topic areas in the PEIR cannot be considered to be robust until the impact assessments are informed by the necessary transport assessment and traffic flow information.

The County Council fully understands the reasoning behind the Scheme i.e. to improve conditions for residents within the Mottram Moor and Woolley Bridge areas. It also acknowledges that the scheme could be likely to generate wider significant economic and regeneration benefits for the Glossopdale area in Derbyshire associated with improvements in connectivity to and from the Manchester conurbation for residents and businesses (see further comments below). Unfortunately, the lack of information in the PEIR makes it difficult for the two Councils to provide their full support for the proposed scheme in the absence of any substantive traffic modelling that would set out the potential impacts of the scheme, in particular on roads within Glossop and Tintwistle and their associated communities; and in the wider area on the A57 and A628, where increased traffic flows could impact on highway safety through the Snake and Woodhead Passes.

It is considered that the timely provision of such information, ahead of, or as part of the current public consultation exercise, may have allayed such concerns. Therefore, the Councils look forward to the future provision by Highways England of the outcomes of the traffic modelling works. This would provide a forecast for the traffic flows resulting from the delivery of the scheme, and would in turn enable the County Council, as Local Highway Authority, to agree with Highways England a package of mitigation works to be developed and implemented on the local roads in Derbyshire. DCC and HPBC strongly recommend to Highways England that, on completion of the transport modelling works, it should organise a timely presentation / workshop on the outcomes of the works to key local authorities impacted by the Scheme.

Whilst only the traffic signal controlled junction together with a short section of carriageway in Woolley Bridge would be located in Derbyshire, nevertheless the Local Highway Authority will engage with both Tameside Metropolitan Borough Council and Highways England in order to agree the layout of the scheme and its subsequent adoption of the parts of the scheme falling within Derbyshire. The County Council would anticipate that these would presumably be made through a legal agreement(s) with the County Council together with the relevant local authorities. In the meantime, however, DCC and HPBC will continue working with Highways England and

other relevant organisations in the setting out of a number of Statements of Common Ground (SoCG) as part of the DCO process.

In the context of the comments above relating to the absence of a transportation assessment and outcomes of the transport modelling works, DCC and HPBC wish to submit a **holding objection** to the public consultation exercise, pending the publication in due course by Highways England of more detailed and robust evidence on the likely highways impacts of the Scheme. The Councils reserve the right to re-consider their position pending the publication of this additional evidence:

In addition to the comments above, DCC and HPBC have a number of additional comments to make on other aspects of the PEIR, as follows:

Air Quality Issues

Air quality issues are covered in Section 5 of the PEIR. Table 5.1 provides details of 55 air quality receptor locations. It is noted, however, that Table 5.1 does not contain any receptor locations in or around Tintwistle. This omission is of significant concern, particularly given the comments above relating to the potential highways impacts of the Scheme and likelihood that traffic flows on the A628 through Tintwistle will increase as a result of the Scheme due to the likely reduction in journey times to and from the Manchester conurbation. Highways England is requested to address this omission in the preparation of the formal Environment Statement.

It is noted that a range of receptor locations have been identified in Table 5.1 in and around Glossop. The inclusion of these receptors is acknowledged and welcomed. However, until the final outcomes of the traffic modelling works are completed and predicted traffic flows established on the highways network, the likely impacts on air quality in Derbyshire as a result of the Scheme cannot yet be fully understood. It is welcomed, therefore, that this issue is appropriately highlighted at Section 5.3.6 of the PEIR, which indicates that once the final set of traffic data has been provided, the air quality modelling for the Environment Statement will be undertaken using the detailed dispersion model ADMS.

With regard to air quality section that report concludes that:

“No exceedances of the Air Quality Strategy objective have been predicted at any of the modelled sensitive receptors located along the Affected Road Network to date. As such, it is not considered that mitigation measures to minimise air quality effects during operation will be required. This will be confirmed when the assessment is updated in the Environmental Statement”

However, It is considered that PEIR report does not follow the procedure outlined in the EIA scoping report, and consequently omits assessment of the likely impacts the scheme will have on the High Peak district, specifically the A57 - Glossop Road and A628 – Woodhead Pass.

The key discrepancies between the reports are the difference in the way the background data is summarised, a change in the study area under consideration and the choice of receptors to evaluate these impacts. Key differences are highlighted below:

Background; EIA scoping Report:

(4) High Peak Borough Council undertakes diffusion tube monitoring at 11 locations within the study area. Exceedances of the AQS objective were recorded at the Pegasus Crossing along the A628 (the average for 2015 was 65.5µg/m³) and at one location along Woodhead Road with a 2015 concentration of 51.8µg/m³. The remaining locations were below the AQS objective for

2015. Whilst High Peak Borough Council hasn't declared an AQMA, one is proposed around the area of the identified exceedances.

PEIR report

5.1.4 High Peak Borough Council undertakes diffusion tube monitoring at 11 locations, including two within the study area, illustrated on Figure 5.1 at Appendix B. Neither site recorded an exceedance of the AQS objective in 2015

Choice of receptors:

EIA scoping Report:

(6) Sensitive receptors potentially sensitive to changes in air quality were identified within the PCF Stage 2 air quality assessment. The location of these sensitive receptors is shown on Figure 5.3 at Appendix B.

PEIR report :

Receptors potentially sensitive to changes in air quality as defined in DMRB HA 207/07 have been identified throughout the study area. The location of these sensitive receptors is outlined in Table 5-1 and shown on Figure 5.3 at Appendix B.

These are not consistent. It is therefore, requested that the preliminary air quality assessment is repeated using the receptors identified in the EIA scoping report including those along the A57 and A628 (e.g. "R41-R45 -Woodhead Road).

The declaration of Woodhead pass is in the process of being prepared by HPBC. The extent of this declaration is currently being determined but, was initially restricted to the East of the A628 / Bank Lane junction. Air quality data to the west of Bank Lane currently, indicates that levels are currently below the action limit along this stretch of the A628. However, they are sufficiently high, to indicate that any increase in the number of vehicles and/or proportion of HGV's would likely cause a breach in the air quality objective.

The above observations are consistent with data obtained by the Highways Agency during their monitoring exercise in 2015. We would request therefore that this potential impact is assessed at this stage.

Similarly, preliminary data obtained for 2017 along the A57 Glossop road indicates that that breaches of AQ objectives are also occurring at some locations, along this road and are very close to exceeding at several others. This again would indicate that any increase in the number of vehicles and/or proportion of HGV's would cause additional breaches in the air quality objective and require the likely extent of any AQMA to be extended further.

The above observations for the A57 (west) are also consistent with data obtained by the Highways Agency during their monitoring exercise in 2015. We would request therefore, that this potential impact is also assessed at this stage.

Once an AQMA has been declared, HPBC is required to draw up an Action Plan setting out how the Authority intends to use the measures and powers available to work towards improving the air quality within these AQMA's. In instances relating to traffic generated pollution, the powers are primarily available to other organisations, such as the relevant highways authority or agency, rather than the district council. Changes in the statutory policy guidance place a greater emphasis on highway authorities to take a leading role in developing actions plans, when, as in this instance, the cause of air quality exceedances is predominantly from roads under their responsibility.

Therefore, it would be anticipated that should the new modelling indicate that the predicted increases in traffic along the A57 or A628, are likely to cause an associated increase in air quality pollution, the mitigation measures, as outlined in the EIA scoping report, would be undertaken by the Highways Authority to reduce this impact and inform the future air quality action plan for the area.

Cultural Heritage Issues

Cultural heritage issues are assessed in Section 6 of the PEIR. The PEIR has correctly identified the archaeological / historic environment issues in relation to this part of the project, namely the potential for Roman archaeology associated with the line of the Roman road from Melandra / Ardotalia north towards Manchester, potential Roman settlement archaeology suggested by small finds in the Woolley Bridge area, the potential for prehistoric archaeology associated with the Etherow floodplain, and setting impacts to the Melandra Castle scheduled Roman fort lying just to the south of the proposal area.

Assessment of significance and impacts in relation to these assets will require a phased approach at the Environment Impact Assessment stage, involving desk-based study and site-based field evaluation as appropriate. Field evaluation would typically proceed from an understanding of geo-archaeology (in particular of likely depths of alluvium in the river valley), and may then comprise geophysics in accessible areas supplemented by trial trenching where appropriate. Assessment of setting impacts to Melandra Castle should comprise a setting study following the 5-step principle established in Historic England guidance (Historic Environment Good Practice Advice in Planning 3) and including appropriate viewpoint photography and visualisation photomontage to show the potential impacts of the development.

Ecology Issues

Ecological issues are covered in Section 7 of the PEIR. As only a very small part of the Scheme area lies within Derbyshire, this presents difficulties as DCC's Officers only have comprehensive ecological data within the County. In turn, this makes it difficult to judge the potential direct impacts which might arise from construction on land outside of the County area, but also indirect impacts, especially from the operational phase which might occur as a result of the scheme in Derbyshire. That said, however, no part of the Scheme's red line boundary area in Derbyshire appears to be covered by ecological designations nor supports records for notable species. Non-statutory designated sites can be found nearby (e.g. Melandra Castle and railway LWS – c1-200m from the scheme area), although the presence of statutorily designated sites are much more distant. As such, there are no ecological sensitivities immediately apparent, at least within the Derbyshire area.

With regards to the PEIR, it is considered that this appears to be adequate in scope, robust in approach, and suitable with regards to the surveys undertaken.

Landscape and Visual Impact

Landscape and visual impact issues are covered in Section 8 of the PEIR. Highways England will be aware that DCC's Landscape Architect has been contacted by the Landscape Consultants who are preparing the Landscape and Visual Impact Assessment (LVIA) for the Scheme to agree key viewpoints. The majority of the scheme is outside of Derbyshire so two viewpoints were selected at Woolley Bridge; one reflecting views of residents and the other users of the Trans-Pennine Trail. One additional viewpoint has been suggested by DCC's Landscape Officer, namely from Melandra Castle; a Scheduled Monument with public access to the south of the new road corridor and occupying an elevated position relative to the new road.

As the scheme is predominantly beyond the County boundary the main impact with regard to sensitive receptors within Derbyshire is likely to be on the visual amenity of the area. In this regard, the PEIR has identified the appropriate Landscape Character Assessments that should inform the design of the scheme including the 'Landscape Character of Derbyshire' publication but clearly the overall success of the scheme will depend on how the assessment process interprets this work to develop a scheme that will be well screened and integrated into the existing landscape structure. In this respect, DCC's Officers would strongly recommend that sufficient land is acquired to truly integrate the road improvements with the surrounding landscape and that proposed screen planting is not simply reliant on linear woodland belts planted parallel to the road corridor. Other mitigation concepts might include the grading out of embankments into the surrounding countryside so that they could be managed as part of that agricultural landscape, hedgerows including hedgerow trees planted along the highway boundary, and strategic off-site planting that would assist in enhancing the wider landscape and assist in blocking views towards the development. There are clearly some significant potential adverse impacts associated with the Mottram Underpass but these are not effects that would directly impact on the residents of Derbyshire. Accordingly, Tameside Borough Council would be best placed to address / comment on these issues.

The PEIR appropriately indicates that during the construction phase there would be adverse visual effects on residential properties along Brookfield Road (A57) associated with compound and storage areas, movement of large plant, and new night time light sources. These effects would last throughout the construction period but during operation it is suggested that the longer term, permanent effects will reduce as screen planting develops and the road integrates better with the wider landscape. This may well be the case but will be dependent on a satisfactory landscape design.

Other improvements relating to signage and lighting of the Scheme need to be carefully considered and located where they would have the least amount of environmental harm including both the ecological and visual dimensions of the landscape.

People and Communities: Economic Development and Regeneration Issues

The Councils are keen to establish the extent of any potential economic impacts that may arise from the proposals. In particular, we would welcome the opportunity to consider data relating to potential journey times and delays on the A57 and other routes in Glossopdale once the scheme is in place.

Residents and businesses based in Glossopdale would benefit from improved connectivity to the Strategic Road Network and Greater Manchester in particular given existing commuting patterns of residents and the importance of Greater Manchester to the Glossopdale economy.

It is disappointing that the People and Communities Section of the PEIR contains very little assessment of the likely economic and regeneration benefits of the Scheme except to suggest that construction of the Scheme will bring a positive impact in terms of construction employment and associated expenditure in the local economy; and that during operation of the Scheme, it is anticipated that there would be local economic benefits as a result of the improvement in accessibility between jobs and the labour market. Although these positive benefits are accepted by DCC as being likely as a result of the scheme, it is considered that the forthcoming Environment Statement should include a more extensive and robust assessment of the likely economic and regeneration benefits of the scheme, particularly in terms of quantifying these benefits in the context of likely jobs created and expenditure multipliers generated for the local economy in both the construction and operational phases of the Scheme.

The Adopted High Peak Borough Local Plan (2016) has identified a range of proposed housing and employment allocations in the Glossopdale area. The provision of the new highways scheme is considered likely to impact positively on the Glossopdale area as a result of improved connectivity to and from the Manchester conurbation, potentially making new housing schemes and employment sites more attractive to both prospective residents and businesses as a place to live and invest. Recent discussions with Officers from HPBC have highlighted that since the Scheme's announcement, there has been an upsurge in interest from both house builders and businesses in potential development sites in the Glossopdale area.

In acknowledging these positive benefits, however, there is potential for the Scheme to generate some adverse impacts for local businesses, particularly in Glossop where a potential increase in congestion on the network, particularly on the A57 through the town centre, may make businesses less attractive for shoppers and service users and potential new occupiers of premises. Again, a full understanding of these likely traffic impacts will only be possible once the transport modelling works are completed.

It is considered important, therefore, that the potential positive and negative economic development and regeneration impacts of the Scheme as highlighted above are assessed in the Environment Statement to support the DCO application.

Overall Conclusions

On the basis of the comments set out above, DCC and HPBC wish to submit a **holding objection** to the Trans-Pennine Highway Scheme Upgrade and public consultation exercise, on the basis of the lack of supporting evidence and information in the PEIR on the potential highways impacts of the Scheme. DCC and HPBC reserve their right to re-consider their position pending the publication by Highways England of this additional evidence. The Councils are keen to work with Highways England to address the issues raised.

DCC and HPBC also requests Highways England to take into consideration the additional comments and concerns set out above on the air quality, cultural heritage, ecology, landscape and visual impact, and economic development and regeneration impacts of the Scheme as set out in the PEIR.

Yours sincerely



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