

From: Anne Robinson [REDACTED]
Sent: 16 July 2021 08:09
To: A57 Link Roads <A57LinkRoads@planninginspectorate.gov.uk>
Subject: TR010034 Development Consent Order (DCO) for the proposed A57 Link previously Trans Pennine Upgrade Programme (TPUP)

Dear Planning Inspectorate

TR010034 Development Consent Order (DCO) for the proposed A57 Link previously Trans Pennine Upgrade Programme (TPUP)

We would be most grateful for your advice regarding due process concerning what we believe are omissions from the above DCO application and an inadequate appraisal undertaken by Highways England for the A57 Link Roads.

Highways England applied for a DCO for the A57 Link Roads on 28 June 2021. We understand that in coming to a decision on whether or not to accept the application, the Planning Inspectorate will be looking at the adequacy of the consultation, and at the 'standard' of the application (including accompaniments) which must be 'satisfactory' (Planning Act 2008 s.55 (3) and PINS Acceptance of Applications Checklist). We have asked the Planning Inspectorate through its enquiry process what constitutes a 'satisfactory standard' but have not yet had a response. We would therefore be most grateful if you would clarify whether or not our concerns below are matters of standard for the Planning Inspectorate or issues for the Examination Panel.

Omissions

We believe there are several documents missing from the DCO application, and key omissions from the Environmental Statement (ES) Chapter 5 Air Quality; from the traffic modelling; and from ES Chapter 15 Cumulative Impacts.

The Local Model Validation Report, the TUBA outputs for vehicle kilometres and carbon (if not in the Local Model Validation Report), and a Traffic Forecasting Report appear to be unavailable. Without them we cannot fully understand the traffic modelling and its results.

The Greater Manchester Clean Air Plan June 2021, para 3.4.4, includes the A57T and A628T within Greater Manchester in its charging zone, yet the impacts of this have been omitted from the air quality and traffic modelling (ES Chapter 5, 5.3.54). From May 2022 charges will apply to non-compliant buses, HGVs, and Hackney Carriages and Private Hire Vehicles licensed outside of Greater Manchester. The impacts of charging on the A57T and A628T are likely to be complex but could lead to diversions by non-compliant vehicles that impact on other roads further afield, such as the M1 and M62, and roads further south crossing the Peak District National Park. We

believe the impacts of the charging on the trunk road should have been assessed in the air quality and traffic modelling.

Developments in Barnsley and Sheffield that could impact on trans-Pennine roads do not appear to have been considered in the ES Chapter 15 Cumulative Impacts. As one of the objectives of the scheme is to increase connectivity between Manchester and Sheffield, and traffic flows on trans-Pennine routes increase we believe consideration of developments in these areas should have been included.

There is also no mention in ES Chapter 15 of another major development, the Hollingworth-Tintwistle bypass. This is identified in the Sheffield City Regional Mayoral Combined Authority's Roads Implementation Plan to be delivered between 2019 and 2024; in Greater Manchester's Transport Strategy 2040 para 277 as an intervention by 2025 to alleviate the issues at Hollingworth and Tintwistle; and in Transport for the North's Investment Programme Table 3 as at Project Control Framework Stage 1 and a specific intervention before 2027. The Hollingworth-Tintwistle bypass therefore appears to fulfil the criteria for consideration as it is a Tier 3 scheme as defined in PINS advice Note 17 on Cumulative Impacts Assessment, version 2, 2019. Evidence of this consideration should therefore be included.

Inadequate appraisal

In December 2020 we wrote to the Minister for Transport and Highways England demonstrating that the strategic and business case for the A57 Link Roads scheme is flawed as it was drawn from an inadequate appraisal (see attached letter). This evidence was based on the Treasury's Green Book Final Review (published 25 November 2020 during the statutory consultation on the scheme), which provided trenchant criticism of scheme appraisal and highlighted that the strategic case for many infrastructure proposals is weak. We did not receive a reply to this letter.

We believe this serious deficiency needs proper scrutiny but, again, we are not sure if this is for the Planning Inspectorate to consider when accepting the draft DCO for examination or if it is for the Examination Panel to consider during the examination. We would be most grateful for clarification and, if the answer is the latter, for assurance that our concerns could be considered by the Examination Panel. We understand that the Planning Inspectorate cannot fetter the Examination Panel.

Many thanks for your assistance and advice.

Yours sincerely

Anne

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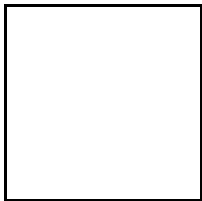


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