Response to:

Secretary of State's consultation letter dated 27 June 2025 for the M60/M62/M66 DCO examination

Introduction

Transport Action Network (TAN) welcomes the opportunity to respond to the Secretary of State's consultation letter dated 27 June 2025. TAN is a national organisation that campaigns for sustainable transport, including active travel (walking, cycling and wheeling), and for public transport, and rail freight. We are an Interested Party in the M60/M66/M62 Simister Island DCO examination, reference number 20049456.

Haweswater Underpass

TAN is disappointed that National Highways (NH) did not take the opportunity to include improvement to the Haweswater Underpass in its DCO application, despite this being repeatedly requested by statutory consultees and local residents in pre-application consultations. The structure of the underpass (the deck overhead), which goes directly under the M60, will be significantly altered as the motorway will be widened here. The underpass is on land owned by NH.

The underpass is a key link between communities on the north and south of the M60, and provides access to important green spaces such as Heaton Park and primary and secondary educational facilities. It has enormous potential as an active travel route, particularly for schoolchildren and for accessing green spaces for recreation and health. Currently it is flooded, muddy, unfit for walking on, and an eyesore as it is covered with graffiti. It is also perceived to be unsafe as it is unlit at night, with no cameras and has poor sight lines.

Images: Tom Jeffs (used with permission) – Google Maps

Whether the Haweswater Underpass is part of the Scheme

NH claimed that improvement of the underpass was "not within the scope of the Scheme" [REP7-020] and that the underpass is "not directly impacted by the Scheme and is not directly related to the Scheme's objectives and the improvement of the strategic road network" [REP3-023].

In its statutory consultation response Transport for the North (TfN) recommended that active travel provision be enhanced, yet NH responded "The aims of the Scheme relate to reducing peak congestion, delivering journey time reliability, and improving safety on this section of the motorway network. Therefore, the Applicant considers that proposals for new pedestrian, cyclist and equestrian infrastructure at Haweswater Aqueduct are not within the scope of the Scheme" [APP-038].

It is obviously untrue that the underpass is "not directly impacted by the Scheme" as it will need to be closed during construction works, and the motorway will be widened above it, thus lengthening the underpass. It is hugely impacted and is clearly 'within scope of the Scheme' and within the red line DCO boundary.

In addition, by suppressing active travel journeys, by not considering *"wider transport objectives, including expanding active travel, and creating safe and pleasant walking, wheeling and cycling environments"* (para 4.57, NNNPS), National Highways risks adding to the pressure for more car journeys in addition to ignoring government policy. This could have a direct impact on the traffic through the junction as recognised by paras 2.8 and 3.42, NNNPS.

It is deeply disappointing that NH did not take the opportunity to include active travel improvements at the underpass within its DCO application, and include the cost of this within the scheme. It is revealing that NH does not see improvements to access and active travel provision as a priority or that these should be part of the Scheme objectives, nor an "improvement to the strategic road network." despite the NNNPS setting this out quite clearly.

TAN believes NH's dismissive attitude towards this important link between communities is perfectly illustrative of its organisation-wide failure to deliver wider government priorities such as reducing severance, improving access, and promoting active travel.

Support from Transport for the North and Transport for Greater Manchester

Improvements to the underpass were supported by Transport for the North (TfN) and Transport for Greater Manchester (TfGM) in their responses to the statutory consultation, prior to the DCO submission [APP-038].

TfN specifically urged that active travel provision "**should be delivered within the scope of the Simister Island Interchange rather than considered for funding via the designated funds**. This includes improvements to improve the Haweswater underpass, bringing it up to the standard of a cycleway and footpath, and connecting it to the local cycle network, and Old Hall Lane footbridge, south of the junction." [our emphasis]

TfN added:

"Without these improvements **included in the main scope of works**, this part of the Strategic Network could continue to be a barrier for local communities, and this scheme will not fully fulfil its objective to provide a scheme that is safe for all road users… improvements to the current facilities could dramatically improve safety for active travellers, reduce severance to the local community and promote social inclusion." [our emphasis]

TfGM recommended in their consultation response that the underpass "is protected and significantly enhanced **as part of the scheme**". [our emphasis]

They added

"it is imperative that National Highways bring this path up to national LTN 1/20 design guidance, consistent with local guidance set out in the future GM Streets for All Design Guide."

Duty to “improve access” in the National Policy Statement for National Networks

We believe NH has erred in law by failing to improve the Haweswater underpass (which it is rebuilding), as part of the Scheme in order to improve active travel provision and improve access. The National Policy Statement for National Networks (NNNPS) at paragraph 5.189 includes a duty on the Applicant to “consider what opportunities there may be to improve access”. NH has failed in its duty to improve access at a vital crossing (which it owns) of the M60 (which it also owns) which severs communities.

The 2024 NNNPS also states that when “considering revisions to an existing right of way, consideration needs to be given to the use, character, attractiveness and convenience of the right of way. The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements in respect of these measures might be attached to any grant of development consent.”

It is clear that the (non) measures put forward are not acceptable. The Secretary of State should make improving the Haweswater Underpass a requirement of the DCO. TAN is concerned that NH could be allowed to get away with sub-standard active travel provision along and across its road network. When challenged about this underpass it has talked vaguely of applying for designated funds to do work that should be part of the scheme. The problem with this approach is that the construction of the scheme could compromise what active travel is designed and built if it is done separately. If the improvements to the underpass need to take place at the same time as the road construction, which makes sense for a whole raft of reasons including minimising the time it is closed, this rather points to the fact that the underpass upgrade should be an integral part of the scheme.

Paragraph 4.57 of the NNNPS also includes a requirement to consider “wider transport objectives, including expanding active travel, and creating safe and pleasant walking, wheeling and cycling environments”. It is clear that NH has not considered wider transport objectives with this scheme. Nor has it sought to expand active travel provision, nor improve the environment for active travel.

Misuse of Designated Funds

Designated Funds were introduced in 2015 to repair the harms caused by the existing strategic road network. They are not there to reduce the apparent cost of a scheme in an attempt to hide its true costs and produce a more favourable business case as seems to be the case here.

There are numerous issues of severance and poor quality crossings that are in urgent need of attention to make them safe and attractive to use, but National Highways refuses to address

them. Outside of this DCO application this is something we urge the Secretary of State to look into.

However, the situation is different here as this is a new scheme. Therefore the cost of the improvement to the underpass should be paid for by National Highways out of the scheme budget, not least so that the Secretary of State can fully appreciate its true costs and impacts when deciding whether to approve the draft DCO or not.

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Transport Action Network provides free support to people and groups pressing for more sustainable transport in their area and opposing cuts to bus and rail services, damaging road schemes and large unsustainable developments

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