

# **A57 Link Roads Scheme DCO Application**

**Response on behalf of the Peak District  
National Park Authority to the Examining  
Authority's draft first written questions  
and requests for information (Issued on  
16 December 2021)**

**Produced by the Peak District National Park  
Authority (January 2022)**

**Application by Highways England for an Order Granting Development Consent for A57 Link Roads**

**The Examining Authority's draft first written questions and requests for information – Issued on 16 December 2021**

**Response on behalf of the Peak District National Park Authority.**

2.0	<b>General Matters</b>		
	<b>Legislation and policy</b>		
2.1	Local planning authorities Local highway authorities	ES Chapters 1-4	<p>ES paragraph 1.3.10 sets out the Applicant's list of relevant adopted plans.</p> <p>a) Does this constitute the full list of development plans and policies relevant to the Proposed Development? Please explain their relevance.</p> <p>No – we believe that it does not adequately reflect the development plans and policies as discussed in our Statement of Common Ground as follows: -</p> <p>Under Peak District National Park Local Plan heading, Policy T2 is referenced, however, the principle of T1: Reducing the general need to travel and encouraging sustainable transport (part B) is important. Part B states that Cross-Park traffic will be deterred. There is also a lack of reference to the Peak District National Park Development Management Policies (2019). Of relevance is Policy DMT1: Cross Park Roads, which sets out the detailed criteria under which road building within the Peak District might be supported. Whilst the A57 Link Roads scheme falls outside the National Park, Policy DMT1 also provides guidance to how road schemes affecting land within the National Park might be considered.</p> <p>b) Are there are emerging development plans? If so, please supply copies there any emerging development plans? If so, at what stage are these proposed plans?</p> <p>The Peak District National Park Authority is currently reviewing its Local Plan (Core Strategy and Development Management Policies document. However, we are in the early stages, producing topic papers and undertaking informal consultation on topics for inclusion</p> <p>c) If there are emerging development plans, are there any policies in them which may be relevant? If so, please supply copies.</p> <p>No</p>

			<p>d) Are there any non-statutory local policies which may be relevant? If so, please supply copies.</p> <p>The Peak District National Park Management Plan may be relevant - <a href="#">National Park Management Plan 2018-2023</a> [REDACTED]</p>
<b>3.</b>	<b>Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders</b>		
	<b>Modelling</b>		
3.5	Local authorities Local highway authorities	Study areas and road sections Transport Assessment Report [APP-185]	<p>The traffic data used within the modelling must be robust to properly assess the Proposed Development. Are the local authorities and local highway authorities content with the study area used in relation to transport networks and traffic?</p> <p>We recognise the guidance from DMRB for the setting of the Assessed Road Network. However, given the relatively high level of traffic predicted on the A628(T) – 850 to 950 AADT (2025 Do Something) and the national importance of the National Park, we would have wished for the study area to have been extended to incorporate the A628 within the boundary of the National Park.</p>
3.6	Local authorities Local highway authorities Applicant	Baseline conditions, surveys and growth assumptions Transport Assessment Report [APP-185] Section 1.1 Peter Simon's submissions [AS004] and [PDL-011]	<p>The traffic data used within the modelling must be robust in order to properly assess the Proposed Development.</p> <p>a) Are the local authorities and local highway authorities satisfied that the input data used in the modelling is appropriate to provide a basis for predicting future traffic flows, with particular regard to the assessment of committed development and future traffic growth?</p> <p>We have some concerns that the modelling is based on both the pre-Covid-19 world view and also possibly does not reflect the changes to travel that will be required to deliver the UK's commitment to decarbonisation.</p> <p>The Covid-19 pandemic has resulted in drastic changes to travel patterns including reasons for journeys, with a greater reliance on the private car. Some of these patterns are set to continue in the medium to long-term and so may affect travel during the early years of the scheme (2025 onwards).</p>

It is also clear that in order to meet the UK's climate change commitments, overall levels of travel, and particularly private car travel will need to reduce. Again, this has possible implications for traffic flows moving forward.

b) Are the local authorities and local highway authorities satisfied that the effects of other works on the network have been suitably addressed within the model?

The scheme is principally targeted towards addressing the local impacts of traffic at Mottram and Woolley Bridge. However, given the predicted growth in traffic as a result of the scheme, it appears at odds with the Greater Manchester Combined Authority's aspiration to constrain traffic growth within the GM boundary.

c) Please comment on the potential for additional trips to be attracted to the route in the "Do-Something" scenario compared with the "Do-Minimum" scenario and the implications for the assessment.

We are particularly concerned that the scheme appears to draw traffic onto less suitable roads within the National Park. The Transport Assessment indicates that trips are abstracted from the M62 Motorway onto the A628(T) as a result of the scheme. The A628(T) is a rural trunk road passing through a National Park. In addition, it has a fairly high risk of accidents and is subject to weather related road closures throughout the year. We believe that the re-routing of vehicles from the motorway to the A628(T) is not appropriate for both safety and environmental impact reasons.

There is a similar situation with the A57 Snake Pass. This is a high-level rural road with a poor safety record and a challenging topography. The road is often closed due to poor weather and / or maintenance issues. It is unclear where the traffic is rerouting from on to the A57 Snake Pass, but it is unlikely that it is being abstracted from a less suitable route.

The model also indicates that with the scheme more traffic will use Monk's Road from its junction with the A624 to provide a shortcut into Greater Manchester (+241 AADT 2025 & +654 AADT 2040). Whilst this will provide some relief to predicted congestion in the Glossopdale area, Monk's road is again not appropriate for large numbers of vehicles.

d) Do the local authorities and local highway authorities have any more comments regarding the Applicant's consideration of baseline conditions and surveys?

No

**Alternatives**

3.12.	Interested Parties	National Highways Deadline 1 Submission [REP1-042] Comments on Relevant Representations Various Relevant Representations	<p>Various parties have suggested that an alternative to the Proposed Development would be a ban on heavy commercial vehicles on the A628 Woodhead Road and A57 Snake Road. The Applicant has provide further comments on this alternative scheme.</p> <p>Do you have any further comments in regard to National Highways' comments?</p> <p>The Peak District National Park Authority did not make a representation calling for an HGV ban on the A628(T) and A57 Snake Pass. Discussions surrounding the previous Highways Agency A57/A628/A616 Mottram-Hollingworth-Tintwistle and Traffic Restraint Measures did touch on both a HGV ban and a 50mph speed limit for the A628 through the National Park.</p> <p>The Peak District National Park Authority would be supportive of a weight limit on the A57 Snake Pass as it appears to be an unsuitable route for HGVs. With regard to the A628(T) any weight restriction would need to be mindful of the possible safety impacts of the removal of the constraints to free-flow that the HGVs provide on the A628(T). The removal of most HGVs would necessitate the introduction of additional restraint measures, possibly the introduction of a 50mph speed limit.</p> <p>The Peak District National Park Authority would be supportive of an assessment of the benefits and impacts of introducing weight limits on the A57 Snake Pass and A628(T).</p>
<b>Public Rights of Way</b>			
3.19	Applicant Local authorities Local highway authorities Interested Parties	Various Relevant Representations	<p>Traffic flows crossing the Peak District on the A628 Woodhead Road and A57 Snake Road are anticipated to increase if the development proposal is implemented. Several Public Rights of Way cross these motor traffic routes.</p> <p>a) Has any statistical or other analysis of the comparison between the “Do-Minimum” and “Do Something” options of the distribution of acceptable gaps for pedestrians to cross the road been made?</p> <p>No, although this is an option that could be carried out</p> <p>b) Do the local authorities and local highway authorities have any comments?</p> <p>Some site visits undertaken as part of the Peak District National Park Authority’s assessment of the impact of the scheme have been undertaken and these have involved utilising crossing</p>

			points on the A628, principally the Trans Pennine Trail crossings at Woodhead Station and Longside end. Traffic flows at the time of the visits (mid-day, mid-week autumn 2017; spring 2019) made crossing the road difficult.
<b>Design – transport networks, traffic, walkers, cyclists, and horse riders</b>			
3.25	Applicant Local authorities Local highway authorities	Case for the Scheme [REP1-036] Section 4.5 Transport Assessment Report [APP-185] Paragraphs 7.2.22 – 7.2.14.	<p>The Proposed Development identifies an increase in accidents and casualties over the appraisal period. Reference is made to the pursuit of measures to minimise these impacts, with particular reference to Snake Pass.</p> <p>a) Have any measures to address this increase been identified, either on Snake Pass or elsewhere?</p> <p>The Peak District National Park Authority has not been consulted on any such measures.</p> <p>b) Have any discussions taken place with the local authorities and/or local highway authorities with regard to the implementation of such schemes?</p> <p>See above</p> <p>c) Do the local authorities and local highway authorities have any comment on the likely success of any such schemes in delivering accident savings on a scale equivalent to the identified disbenefit resultant from the scheme?</p> <p>Any scheme to address the issue would need to reflect the setting and National Park purposes.</p> <p>d) What delivery methods, if any, have been identified to secure any proposals?</p> <p>N/a</p>
<b>6.</b>	<b>Landscape and visual</b>		
<b>Study area, baseline conditions and overall assessment methodology</b>			
5.3	Peak District National Park Authority	Peak District National Park Dark skies ES Chapter 7 [APP-063]	Paragraph 7.6.20 notes that consideration has been given to three areas within the Peak District National Park as “dark skies”, but these have been excluded from further assessment as the Proposed Development is unlikely to be visible from the sites.

			<p>Is Peak District National Park Authority content that no further assessment is required?</p> <p>'Dark Skies' – indirect effects of lighting of the scheme may have adverse effects on the appreciation of dark skies from within the Park, so no, we do not believe that the assessment has given this issue adequate weight within the assessment.</p>
5.4	Local authorities Peak District National Park Authority	Viewpoints Night-time assessment ES Chapter 7 [APP-063]	<p>Paragraph 7.3.66 sets out viewpoints used to aid the assessment of night-time effects arising from operational lighting.</p> <p>Are the local authorities and Peak District National Park Authority content that the chosen viewpoints are representative?</p> <p>Viewpoints are acceptable</p>
5.7	Local authorities Peak District National Park Authority Natural England	Outstanding study area, baseline conditions and overall assessment methodology concerns	<p>a) Are the local authorities, Peak District National Park Authority and Natural England satisfied with the approach for landscape and visual with respect to:</p> <ul style="list-style-type: none"> <li>• the study area and visibility;</li> <li>• the receptors selected for the assessment and whether they are representative;</li> <li>• the definitions of value, significance, sensitivity and magnitude of impact; and</li> <li>• the criteria used to define significant effect?</li> </ul> <p>No; as noted in section 8.2 of the Local Impact Report we do not believe that the baseline for the assessment has been adequately defined.</p> <p>b) How should any outstanding concerns be addressed?</p>
	<b>Landscape</b>		
5.14	Peak District National Park Authority	Peak District National Park Indirect effects	<p>Is the Peak District National Park Authority content with the assessment of indirect effects on the Peak District National Park?</p> <p>As defined in more detail within the Local Impact Report we are not content that the assessment of indirect effects has been covered in adequate detail.</p>
5.15	Local authorities Peak District National Park Authority Natural England	Outstanding landscape impact assessment concerns ES Chapter 7 [APP-063] ES Chapter	<p>a) Do the local authorities, Peak District National Park Authority and Natural England have any outstanding concerns regarding:</p> <ul style="list-style-type: none"> <li>• the landscape and townscape impact assessment;</li> <li>• mitigation measures including the REAC and Environmental Masterplan;</li> <li>• whether a draft Landscape and Ecological Management Plan should be submitted to the Examination;</li> </ul>

		16 [APP-072] REAC [REP1-037] Figure 2.4 Environmental Masterplan [APP-074]	<ul style="list-style-type: none"> <li>• the maintenance regime, monitoring and remedial actions during operation; or</li> <li>• compliance with policy?</li> </ul> <p>Yes</p> <p>b) Are there any reasons to question that there would be no significant effects on landscape or townscape character, other than the temporary effects identified in ES Chapter 16?</p> <p>Yes; these matters are not considered adequately in the assessment – while I would not say that indirect landscape effects definitely would be significant, it is possible they might. The assessment methodology dismisses the potential significance of lower magnitudes of effect without giving them adequate consideration.</p> <p>c) How should any outstanding concerns be addressed?</p> <p>A more refined study area, a more detailed methodology and assessment process where judgements are explained and justified is required by the applicant so the potential significance of indirect effects can be adequately considered within the decision-making process.</p>
	<b>Visual</b>		
5.19	Local authorities Peak District National Park Authority	Outstanding visual impact assessment concerns ES Chapter 7 [APP-063] ES Chapter 16 [APP-072] REAC [REP1-037] Figure 2.4 Environmental Masterplan [APP-074]	<p>a) Do the local authorities or Peak District National Park Authority and Natural England have any outstanding concerns regarding:</p> <ul style="list-style-type: none"> <li>• the visual impact assessment;</li> <li>• mitigation measures including the REAC and Environmental Masterplan;</li> <li>• whether a draft Landscape and Ecological Management Plan should be submitted to the Examination;</li> <li>• the maintenance regime, monitoring and remedial actions during operation; or</li> <li>• compliance with policy?</li> </ul> <p>Yes</p> <p>b) Are there any reasons to question that there would be any significant visual effects other than those summarised in ES Chapter 16?</p> <p>Yes; these matters are not considered adequately in the assessment – while I would not say that indirect visual effects definitely would be significant, it is possible they</p>



			<p>might. The assessment methodology dismisses the potential significance of lower magnitudes of effect without giving them adequate consideration.</p> <p>c) How should any outstanding concerns be addressed?</p> <p>A more detailed methodology and assessment process where judgements are explained and justified is required by the applicant so the potential significance of indirect effects can be adequately considered within the decision-making process.</p>
<b>6.</b>	<b>The Historic Environment</b>		
	<b>Policy and methodology</b>		
6.1	Historic England Local authorities	ES Chapter 6 [REP1-015]	<p>Table 6.2 sets out the criteria to determine the value of heritage assets. Do you have any comments regarding the values placed on the designated heritage assets in this table?</p> <p>We consider Grade II Listed Buildings and Grade II Registered Parks and Gardens to be of High Value – they are of national importance. Some archaeological remains are also of High importance, even if they are not scheduled.</p>
6.4	Applicant Historic England Local authorities	ES Chapter 6 [REP1-015]	<p>When referring to designated heritage assets, the NPPF only identifies two levels of harm, substantial and less than substantial. Table 6.3, which sets out the factors in assessing the magnitude of impact, also identifies limited harm.</p> <p>b) Historic England, Derbyshire County Council, High Peak Borough Council and Tameside Metropolitan Borough Council – Do you have any comments on the use of limited harm given the tests sets out in the NPPF?</p> <p>The levels of harm should be consistent with the wording of the NPPF (i.e. ‘substantial,’ or ‘less than substantial’). Nuance within the ‘less than substantial’ category can help define lower levels of harm. Therefore, ‘minor harm’ should still be ‘less than substantial’, but at the lower end of this scale.</p>
	<b>National Park</b>		
6.8	Applicant Peak District National Park Authority	Peak District National Park Authority [RR- 0677]	The Peak District National Park Authority identified in its RR that heritage assets are a part of the attraction of the PDNP and has raised concerns in relation to the impact on the Tintwistle Conservation Area and several heritage assets and their landscape setting.

			<p>a) Peak District National Park Authority – please set out whether you consider that the adverse impact on the experience of the TWA arising as a result of increased traffic would cause harm to the significance of the heritage asset. If A Conservation Area Appraisal is available, please can you submit this into the Examination.</p> <p>We consider that increased traffic within the Tintwistle Conservation Area will not achieve enhancement of the character or appearance of the area. Any impacts (such as increased erosion of stonework through pollution) would be minor and long-term, and so are very hard to determine, but would be on the lowest end of the scale of ‘less than substantial’ harm. The increased traffic would also have a negative impact on the setting of the conservation area, including on how it was experienced by people. This will also be at the lower end of ‘less than substantial’ harm. A Conservation Area Appraisal is available – this notes that traffic already badly affects this Conservation Area.</p>
<b>7.</b>	<b>Air quality</b>		
	<b>Operational phase</b>		
7.14	Local authorities Natural England	Outstanding concerns	<p>a) Do the local authorities or Natural England have any outstanding concerns regarding the assessment methodology, potential impacts, mitigation measures, monitoring, or compliance with policy for the operational phase? How should any outstanding concerns be addressed?</p> <p>We have concerns that the confidence limits for the traffic increase figures, in particular for the A628 and A57, could take the predicted figures over the 1000 AADT threshold, and that the potential for air quality impacts on the Blanket Bog and Upland Heathland habitats of the SAC have therefore erroneously been scoped out.</p> <p>b) With the secured mitigation measures in place, do the local authorities or Natural England consider that it is likely or unlikely that there would be any significant air quality effects during the operational phase?</p> <p>Please see above</p>
<b>12</b>	<b>Biodiversity, ecological and geological conservation</b>		
	<b>Habitat Regulation Assessment</b>		
12.12	Applicant	Habitats Regulation Assessment [APP-	We have concerns that insufficient evidence is presented to support the conclusion that there would not be significant operational impacts on SPA SSSI-qualifying breeding bird species, and on Mountain Hare as a Species of Principal Importance in England, regarding noise and

		054] Screening matrices	road mortality impacts; and that, for the reasons outlined in 7.14a) above, that potential air quality impacts have been wrongly screened out as having a likely significant effect. In addition, visual disturbance to species, and increased wildfire risk associated with increased traffic volumes, have not been considered.
12.13	Applicant	A628 Habitats Regulation Assessment [APP-054]	We have concerns that the confidence limits for the traffic increase figures, in particular for the A628 and A57, could take the predicted figures over the 1000 AADT threshold, and that the potential for air quality impacts on the Blanket Bog and Upland Heathland habitats of the SAC have therefore erroneously been scoped out.