



## **A57 LINK ROADS**

**TRO10034**

**DEADLINE 2 JANUARY 14<sup>TH</sup> 2022**

**WRITTEN REPRESENTATION**

**CPRE Peak District and South Yorkshire Branch**

**Unique Reference: 20029243**

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## SUMMARY

CPRE objects to the development in principle as the need for it has not been established; alternative solutions have not been rigorously assessed; and the disbenefits of the scheme, when weighed in the planning balance, means it cannot be recommended to proceed.

The Development Consent Order (DCO) for the A57 Link Roads should be recommended for refusal. *'Under section 104 of the Planning Act the Secretary of State must decide an application for a national networks nationally significant infrastructure project in accordance with this NPS unless he/she is satisfied that to do so would:*

- *lead to the UK being in breach of its international obligations;*
- *be unlawful;*
- *lead to the Secretary of State being in breach of any duty imposed by or under any legislation;*
- *result in adverse impacts of the development outweighing its benefits;*
- *be contrary to legislation about how the decisions are to be taken'* (NPSNN 1.2).

We will show that all five bullets are material to a decision made about this scheme.

The A57 Link Roads do not solve the traffic problem; instead they address the symptoms of it by displacing, redistributing and generating traffic in Longdendale and Glossopdale. Traffic increases on trans-Pennine routes, contrary to the statutory purposes of the National Park. Road collisions increase.

The Transport Appraisal Report is too superficial to allow full comprehension of the traffic effects. Understanding these is essential to assessing the Environmental Statement (ES). The ES has omissions and errors, placing it in breach of the National Policy Statement for National Networks, the Environmental Impact Assessment regulations and National Highways' licence conditions.

The scheme increases carbon emissions contrary to the urgent and radical reduction required to address the climate emergency. It is likely to make it more difficult to achieve Net Zero 2050, the UK Carbon Budgets and the UK's obligations under the Paris Agreement. Nitrogen dioxide would remain above the legal limit for some areas. Achieving Air Quality Strategy objectives and the Air Quality Directive may be compromised. The scheme is inappropriate development in the Green Belt and would harm its openness. Valued countryside would be permanently changed for the worse in its form, distinctiveness and as an important amenity for access and nature. Tranquillity would be lost. These disbenefits lead to a negative planning balance.

Alternative measures that would address the problem without invasive road building were dismissed inappropriately by National Highways. There are compelling arguments for re-examining them, and we present them for consideration. Their implementation would avoid the harm the Link Roads would impose, and benefit people and the environment.

## PART 1 INTRODUCTION

### 1.1 CPRE Peak District and South Yorkshire (CPRE PDSY)

1.1.1 This is the written representation of CPRE PDSY. CPRE PDSY was set up in 1924 and is an independent branch of the national CPRE The countryside charity. It promotes the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country. As the Friends of the Peak District the branch is the National Park Society for the Peak District National Park and works closely with Campaign for National Parks, the umbrella body for organisations concerned about the National Parks.

The branch was responsible for mapping the boundary of the Peak District National Park which led to its designation in 1951, and for the creation of the Sheffield Green Belt. For nearly fifty years we have campaigned for a solution to trans-Pennine transport issues that would relieve local towns and villages of traffic impacts without destroying the integrity of the National Park and surrounding countryside.

1.1.3 We engaged with the 2015 Trans-Pennine Routes Feasibility Study which led to this scheme being proposed. We objected to the A57 Link Roads (previously known as the Trans-Pennine Upgrade) through the statutory consultations in 2018 and 2020.

### 1.2 Structure of the Written Representation

1.2.1 In the following order we:

- Make the arguments as to why options to the scheme need to be explored;
- Describe the nature of the problem;
- Describe the history of sustainable alternatives and summarise *Car Free Low Carbon Travel for Longdendale and Glossopdale*, our proposed alternative measures;
- Assess the environmental impacts and establish the planning balance for the scheme;
- Conclude with the reasons why the scheme should not be recommended for its DCO.

## **PART 2 THE NEED FOR THE A57 LINK ROADS IS NOT ESTABLISHED**

Before we examine the need for the scheme and alternative options we must address the policy requirement in NPSNN 2014. NPSNN paragraph 4.27 assumes that projects have been subject to full options appraisal in achieving their status within the Road Investment Strategy (RIS). It advises that *'it is not necessary for the Examining Authority and the decision maker to reconsider this process, but they should be satisfied that this assessment has been undertaken.'* In addition the nature of the problem must be understood. We believe there is strong justification for the Examination to scrutinise the options and our proposed alternative measures, as follows.

### **2.1 POLICY GROUNDS TO ADDRESS OPTIONS TO THE SCHEME**

#### **Policy framework**

2.1.1 This consists of the NPSNN, the NPPF 2021, English National Parks and the Broads: UK Government Vision and Circular 2010, and the PDNPA's Core Strategy 2011.

#### **NPSNN 2014**

2.1.2 The NPSNN is the primary policy document to be applied under the Planning Act 2008 s.104(3). The relevant paragraphs on alternatives in NPSNN are as follows.

*'4.26 Applicants should comply with all legal requirements and any policy requirements set out in this NPS on the assessment of alternatives. In particular:*

- *The EIA Directive requires projects with significant environmental effects to include an outline of the main alternatives studied by the applicant and an indication of the main reasons for the applicant's choice, taking into account the environmental effects.*
- *There may also be other specific legal requirements for the consideration of alternatives, for example, under the Habitats and Water Framework Directives.*
- *There may also be policy requirements in this NPS, for example the flood risk sequential test and the assessment of alternatives for developments in National Parks, the Broads and Areas of Outstanding Natural Beauty (AONB).*

*4.27 All projects should be subject to an options appraisal. The appraisal should consider viable modal alternatives and may also consider other options (in light of the paragraphs 3.23 to 3.27 of this NPS). Where projects have been subject to full options appraisal in achieving their status within Road or Rail Investment Strategies or other appropriate policies or investment plans, option testing need not be considered by the examining authority or the decision maker. For national road and rail schemes, proportionate option consideration of alternatives will have been undertaken as part of the investment decision making process. It is not necessary for the Examining Authority and the decision maker to reconsider this process, but they should be satisfied that this assessment has been undertaken.'*

The relevant legal and policy requirements for National Parks appear in paragraphs 5.150-152. *'Great weight should be given to conserving landscape and scenic beauty in nationally designated areas. National Parks, the Broads and Areas of Outstanding Natural Beauty have the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued*

*protection and which the Secretary of State has a statutory duty to have regard to in decisions’.*

*5.151 The Secretary of State should refuse development consent in these areas except in exceptional circumstances and where it can be demonstrated that it is in the public interest. Consideration of such applications should include an assessment of:*

- the need for the development, including in terms of any national considerations, and the impact of consenting, or not consenting it, upon the local economy;*
- the cost of, and scope for, developing elsewhere, outside the designated area, or meeting the need for it in some other way; and*
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. (our emphasis)*

*5.152 ‘Planning of the Strategic Road Network should encourage **routes that avoid** National Parks, the Broads and Areas of Outstanding Natural Beauty.’ (our emphasis).*

### **NPPF 2021**

*2.1.3 The relevant paragraphs of NPPF are paragraphs 176 and 177 which are exactly the same as paragraphs 5.150 and 5.151, except paragraph 176 refers to the setting of the National Parks. ‘Development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on these designated areas.’ It also refers to the relevant Government circular. ‘English National Parks and the Broads: UK Government Vision and Circular 2010 provides further guidance and information about their statutory purposes, management and other matters.’*

### **English National Parks and the Broads: UK Government Vision and Circular 2010**

*2.1.4 Paragraph 85 of the Circular states ‘Any investment in trunk roads should be directed to developing routes for long distance traffic which avoid the Parks’.*

### **PDNPA’s Core Strategy**

*2.1.5 The core strategy reinforces national policy and guidance.*

*‘T1: Reducing the general need to travel and encouraging sustainable transport*

- A. Conserving and enhancing the National Park’s valued characteristics will be the primary criterion in the planning and design of transport and its management.*
- B. Cross-Park traffic will be deterred.*
- C. Modal shift to sustainable transport will be encouraged...*
- G. Demand management and low carbon initiatives will be sought where appropriate.’*

*‘T2: Reducing and directing traffic*

- A. Transport developments, including traffic management schemes, which reduce the amount of cross-Park traffic, will be supported if they can be accommodated without adverse impact on the National Park’s valued characteristics. Transport developments which increase the amount of cross-Park traffic or have other adverse effects on its setting and character, amenity and enjoyment will be opposed.*
- B. In exceptional circumstances, transport developments (including expansion of capacity, widening or a new route) that increase the amount of cross-Park traffic*

*may be accepted where: there is a demonstrable long term net environmental benefit within the National Park.'*

For the exceptional circumstances required by T2B to be shown, a development must meet the criteria in NPSNN paragraph 151 and NPPF 2021 paragraph 177.

### **Our reasoning**

2.1.6 We do not believe that Highways England has correctly identified all legal and policy requirements with respect to NPSNN paragraph 4.26 and the cascade of policies that follow from it.

#### 2.1.7 Planning of the Strategic Road Network has not sought to avoid the National Park

The designation of a National Park confers the highest status of protection for landscape and scenic beauty<sup>1</sup>. The statutory purposes of National Parks<sup>2</sup> are:

- (i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Parks; and
- (ii) to promote opportunities for the understanding and enjoyment of the special qualities [of the Parks] by the public.

2.1.8 The Government takes National Park purposes extremely seriously. Section 62 of the Environment Act 1995 places a general duty on statutory undertakers, such as the applicant, to have regard to the purposes of National Parks when coming to decisions or carrying out their activities relating to or affecting land within the Parks. With traffic increases on cross-Park roads the applicant has a duty under the Environment Act, which it has yet to demonstrate that it has met in its decision-making.

2.1.9 There is substantial evidence that in planning of the A628T corridor (which is the Strategic Road Network through the Park) Highways England has not sought routes that avoid the PDNP. Rather, Highways England's (previously Highways Agency created 1994) planning has consistently for 26 years, focused only on upgrading the A628T corridor which passes through the Park. This is contrary to NPSNN, NPPF, Defra's National Park circular and the PDNPA's Core Strategy.

2.1.10 In 2007 a bypass of Mottram, Hollingworth and Tintwistle was presented to a public inquiry but was postponed after a few days of hearings and withdrawn 2 years later. The 2015 Trans-Pennine Routes Feasibility Study was predominantly road-based<sup>3</sup> and concluded that the current scheme with climbing lanes on the A628 between Woodhead Bridge and Salters Brook Bridge within the PDNP and dualling of the A61 should be taken forwards. Although climbing lanes, were removed from the scope of the Scheme<sup>4</sup>, aspirations to further develop the trunk route across the National Park remain. *'The development of 'A628 Climbing Lanes' and 'A61 Dualling' proposals have been postponed until a later date, to allow further consideration of the associated benefits'*<sup>5</sup>. Furthermore *'The Applicant is still exploring the feasibility of the Hollingworth-Tintwistle bypass but no formal commitment to*

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<sup>1</sup> National Planning Policy Framework 2021 para 176; NPSNN paragraph 5.151

<sup>2</sup> Environment Act 1995, Section 61

<sup>3</sup> Trans-Pennine Routes Feasibility Study Stage 1 report 2.5.1

<sup>4</sup> ES Ch1-4 Introduction Table 1-3

<sup>5</sup> The Case for the Scheme 2.1.10

*this currently exists and any proposals would need specific transport and environmental assessments<sup>6</sup>. 'Additional studies have been highlighted by Transport for the North to enhance the future connectivity between Manchester and Sheffield that will look to address the issue in the adjacent villages'.*

2.1.11 Most recently (August 2021) Transport for the North announced<sup>7</sup> *'The development of The TransPennine Tunnel (TPT)<sup>8</sup> linking Sheffield and Manchester would see a dramatic improvement in travel times, creating an easy pass through some of the highest and most difficult terrains in the region, reducing the journey time between the M1 and M60 to 30 minutes. While the scheme is still in the early stages of development, Highways England said the TPT will cost between £8bn and £12bn to complete. However, it is essential to improving the links between Manchester and Sheffield, as currently, traffic uses the A628 Woodhead pass, which often closes in winter due to the hazardous conditions. The TPT would also increase the existing vehicle usage on the A628 to around 35,000 vehicles.'*

2.1.12 Furthermore, the Hollingworth-Tintwistle bypass appears frequently in policy documents. It is identified in the Sheffield City Region 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; in Transport for the North's Investment Programme Table 3 as at Project Control Framework Stage 1 and a specific intervention before 2027; as a protected route to the boundary with Derbyshire in the Tameside MBC UDP 2004.

2.1.13 This demonstrates that Highways England's planning of the SRN has consistently focused on, and not avoided, the route through the Peak Park. Furthermore it emphasises that road building has been the preferred option; rigorous scrutiny of alternatives, as required by the test of major development (see below), has not been pursued.

2.1.14 Increases of cross-Park traffic trigger the need to show exceptional circumstances  
The A57 Link Roads would increase cross-Park traffic on the A628T and the A57 Snake Pass<sup>9</sup>. PDNPA Core Strategy T2 only permits increases of cross-Park traffic *'In exceptional circumstances'*, and where *'there is a demonstrable long term net environmental benefit within the National Park'*. There is no demonstrable long term net environmental benefit within the Park, indeed there are adverse impacts on the Park's tranquillity, amenity and wildlife.

2.1.15 For exceptional circumstances to be shown the scheme must pass the test set in NPSNN paragraph 5.151 and in NPPF paragraph 177. The need for the scheme must be demonstrated and the developer must *'assess the cost of, and scope for, developing elsewhere, outside the designated area, or meeting the need for it in some other way'*. This means the Examination must scrutinise the scheme against these two criteria.

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<sup>6</sup> Consultation Report 3.3.7; Table 8-33 page 215 & Table 8.24 page 280

<sup>9</sup> ES Appendix 2.1 Traffic Data



### 2.1.16 Options appraisal flawed

The Road Investment Strategies 1 and 2 are the vehicles through which the A57 Link Roads have been promoted. They are an investment decision-making process which articulates the Government's funding strategy for roads (NPSNN para 1.21) Road Investment Strategy (RIS) 2: 2020-2025 explains that the document makes an investment commitment to the projects listed on the assumption that they can 'secure the necessary planning consents.' 'Nothing in the RIS interferes with the normal planning consent process.'

2.1.17 Even if a full options appraisal has been carried out for the purposes of including it in the RIS there may be several reasons why further consideration of options is required. As outlined by the Stonehenge case judgement the options appraisal (i) may not have involved all the considerations which are required to be taken into account under the development consent process; (ii) there may have been a change in circumstances since that exercise was carried out; (iii) the options testing for a RIS may rely upon a judgement by National Highways which undermines reliance upon that exercise and NPSNN 4.27; and (iv) updating of the appraisal is expected<sup>10</sup>.

2.1.18 Taking these reasons in order -

(i) National Highways (previously Highways Agency created 1994; then Highways England) planning has consistently for 26 years focused only on upgrading the A628 corridor through the Park, which is contrary to NPSNN, NPPF, Defra's National Park circular and the PDNPA's Core Strategy. The DCO process must take into account the impacts of cross-Park traffic increases which triggers all of the above policies.

(ii) There have been far reaching changes in circumstances which took place since RIS2 was published and before, or during, the 2020 statutory consultation:

- Climate emergency declared May 2019 by UK Government;
- Climate Change Act 2008 amended in June 2019 to reach Net Zero emissions by 2050 in June 2019;
- Covid-19 pandemic (March 2020 and ongoing) which radically altered travelling patterns, and increased homeworking and virtual meetings for businesses;
- Review of Treasury Green Book, 25 November 2020, which provides the framework to evaluate the value of new infrastructure;
- Radical national and regional targets to cut urban traffic and increase walking and cycling to 50% by 2030 in DfT's Decarbonising Transport and by 2040 in Greater Manchester's Right Choice policy, both published in 2021.

(iii) A lorry ban coupled with sustainable transport measures and technological improvements was never fully tested by Highways England in 2015. Individual elements that compared favourably with the scheme were rejected prematurely (see further detail in Part 3 of this representation). As *Car Free Low Carbon Travel for Longdendale and Glossopdale* demonstrates, implementation of such measures would have far-reaching benefits, would avoid the adverse consequences this scheme would bring on the Park, and prove less costly.

(iv) RIS1 2015-2020 para 2.12<sup>11</sup> expects the appraisal of schemes to be updated. *‘The appraisal for these schemes will continue to be updated as the schemes develop. It is possible that some of these major schemes will as a result of further analysis of the economic, strategic and delivery cases be found to not be justified. In which case they would not be pursued and Highways England would have to explore other means of tackling the identified problems’*. This applies to this scheme, the strategic case for which has not been updated, as we pointed out in December 2020. The Treasury updated its Green Book in November 2020 which gave the applicant plenty of time for a review of the strategic case.

2.1.19 In conclusion for all these reasons we believe that the Examination must question the need for the scheme and scrutinise alternatives to National Highways’ proposal.

## **2.2 WHAT IS THE NATURE OF THE PROBLEM?**

2.2.1 The nature of the problem has not been defined in the DCO documents. National Highways condenses the issues<sup>12</sup> in a few sentences which describe the symptoms not the actual problem. *‘The A57 and A628 between Manchester and Sheffield currently suffer from heavy congestion, creating unreliable journeys, which limits journey time reliability. This restricts economic growth due to the delays experienced by commuters and business users alike. The congestion also results in rat running through smaller towns and villages, as vehicles attempt to reduce queuing times’*. This description wholly underplays the complexity of the issues along the corridor and the wider context.

2.2.2 The Pennines are perceived as a major barrier to east-west movements across the North of England and hence to economic regeneration. Within the Peak District National Park four roads – the A635, A6024, A628 and A57 - cross the Dark Peak plateau. These wild, open, windswept moorlands are of international importance to biodiversity and strongly protected by UK law. With their altitude, awkward alignments, inclement weather, and few trees or dwellings, they are remote passes. The ascents by which the plateau is reached vary in character for each road but all provide the traveller, from the comfort of his car, with a fine spread of faraway cities, narrow views down tumbling brooks or onto reservoirs, abrupt walls of grass and rock including quarry faces, and expansive views over heather and grass. For those not speeding through in their cars, walking or cycling, enjoying paths or open access land, the traffic is intimidating and intrusive.

2.2.3 The A57/A628/A616T between the M1 in South Yorkshire and the M67 in Greater Manchester is the only trunk route across the Park. For most of its corridor the road is a single carriageway that rises to an altitude of over 450m. Limited opportunities for overtaking, with substandard alignments and gradients, and high numbers of Heavy Goods Vehicles (HGVs) lead to poor journey times and a relatively high accident rate. Queues of slow moving traffic are inevitable given the volume of HGVs using the route, leading to driver frustration and a heightened level of risk taking. Traffic on the route is vulnerable to disruption because of adverse weather and collisions. The majority of traffic is inter-regional not national and causes substantial adverse environmental impacts on the high quality environment of the National Park.

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<sup>11</sup>

<sup>12</sup> 7.1 The Case for the Scheme, Executive Summary page 6.

2.2.4 Within the three villages of Mottram in Longdendale, Hollingworth and Tintwistle a minority of through traffic of heavy lorries meets a majority of locally generated car traffic - in 2015 21,433 vehicles per day (AADT) or 62% of the 34,542 vehicles per day on Mottram Moor<sup>13</sup> were of local origin. Through traffic of HGVs is a minority of the overall total (11.5% east of Tintwistle in 2015) but creates a substantial impact. The combination of lorries, cross-Park, visitor and local commuter car traffic creates congestion, air and noise pollution, intimidation of pedestrians and cyclists, damage to property, road traffic accidents, journey time unreliability for buses, and pressures on parking. The level of traffic also severs local communities.

2.2.5 Glossop has developed as a dormitory settlement for car commuters with limited local employment opportunities and congestion on its roads. A large proportion of Glossopdale's working residents commute to work outside the area in Tameside, Stockport and Manchester. Development of industrial land has increased local heavy lorry traffic. On Mottram Moor, a significant proportion (52%) of the 2,220 daily HGV movements appears to be generated locally<sup>14</sup>.

2.2.6 Alternatives means of travel to the private car for both the A628T corridor and the A57 Snake Pass are non-existent<sup>15</sup>. To visit Sheffield from Glossopdale and Longdendale travellers have to either catch the train into Manchester and change trains to use the Hope Valley Line or drive from Glossop to New Mills or Chinley and catch the Hope Valley service there. There is also no direct rail link to Stockport or Stalybridge and Ashton-under-Lyne.

2.2.7 The National Park and the wider Peak District face serious traffic pressures because of their central location in the country, surrounded by the major conurbations of the Midlands, the North West, and South and West Yorkshire. In addition to the Park being subject to high volumes of cross-Park traffic, it is also within an hour's drive of over twenty million potential visitors, the majority of whom (87%) arrive by car.

2.2.8 NH describes its attempts to address the issues on the trunk route over the last 50 years by increasing road capacity<sup>16</sup>. To that description we add three key points – (i) the overarching agenda; (ii) failure to plan strategically for both road and rail; and (iii) the 2007 collapse of the Mottram-Hollingworth-Tintwistle bypass due to traffic modelling errors.

(i) The overarching agenda through those 50 years, beginning with the construction of the M67, was pursued through a pamphlet produced in 1988<sup>17</sup> and is still being pursued through ongoing work for the Southern Pennines Strategic Development Corridor<sup>18</sup>. The aim is to create a high standard all-purpose trans-Pennine route linking South Yorkshire and Greater Manchester as a vital component for successful urban regeneration on both sides of the Pennines. These aspirations continue, fed by piecemeal upgrades and conflicting policy signals. The Stocksbridge bypass (opened in 1988) increased the strategic importance of the route and traffic flows on it, just as the A57 Link Roads will if they go ahead. Fifty years of aspirations for an all-weather fast route through Longdendale linking the M1 and the M67 is

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<sup>13</sup> [REDACTED] We have used 2015 as the base year in keeping with NH's modelling.

<sup>14</sup> In 2015 there were 21,506 HGVs east of Tintwistle and 2,220 HGVs on Mottram Moor.

<sup>15</sup> The X57 on the Snake Pass between Sheffield and Manchester offered a limited stop express service for about 6 months before being stopped in January 2022.

<sup>16</sup> The Case for the Scheme - Summary

<sup>17</sup> Mottram Hollingworth and Tintwistle The need for a bypass, 1988, Tameside MBC, Derbyshire CC and High Peak BC

<sup>18</sup> South Pennines Strategic Development Corridor, 2020

commencing piecemeal with a bypass of Mottram, which threatens the integrity of the habitats and the special qualities of the National Park.

(ii) The aspirations reflect a failure to plan strategically for trans-Pennine travel between the Scottish border and the A50. Twelve miles further north of the A628T corridor the M62 is designated part of the EU Trans-European Network (TEN) or Trans-Pennine Corridor with the M56, M180, and the north-south Trans-Pennine rail routes. There has been no attempt to reduce traffic impacts on the sensitive Pennine uplands by focusing trans-Pennine movements on the M62 corridor using a braided approach to road, rail and water. Instead, upgrades of the M62, the A66T and the A628T are being developed at present.

(iii) The explanation by National Highways given for the failure of the Mottram-Hollingworth-Tintwistle bypass to proceed is the weight of objections. There were strong objections to the bypass but the 2007 public inquiry lasted only 10 days because of errors in the traffic modelling. These were pointed out by the objectors, National Highways admitted there were errors (Appendix A) and the inquiry was postponed to allow corrections to be made to the modelling. The public inquiry never re-convened. It finally closed nearly two years later, without another meeting, in March 2009.

2.2.9 That there were errors in the traffic modelling in 2007 so serious that the scheme could not be resurrected makes it essential that the traffic modelling for this scheme is scrutinised. We therefore welcome the ExA's question 3.5 addressed to the applicant and the local authority about modelling.

2.2.10 In conclusion the A57 Link Roads do not solve the traffic problems along the trunk. They simply move the congestion and its accompanying air and noise pollution from the A57T and A57 Woolley Lane, a mile further east and into Glossopdale. National Highways admits '*The aim of scheme is to move traffic from heavily congested roads such as the A57 through Mottram adjacent to residential properties and redistribute it on other routes extending through rural and industrial areas resulting in an overall benefit in local air quality*<sup>19</sup>'. As the scheme would only bypass one of the affected villages and is setting the situation up for the next piece of road, scrutiny of options is essential.

2.2.11 Rather than a hilly obstacle to connectivity, the Pennines define the North, and the fact that the majority of the Pennines are already protected by National Park, AONB and Green Belt designations indicates their high value. Spatial and economic planning needs to stop treating this highly-valued countryside as a constraint on development, and embrace it as a defining feature of place.

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<sup>19</sup> Response to RR-030-1 page 93

## PART 3 ALTERNATIVES

### 3.1 HISTORY OF ALTERNATIVES

3.1.1 We have been developing and promoting alternatives to major road building since 2004. Our 2004 'Way to Go'<sup>20</sup> proposals were well received but only a minority have been progressed. The MTRU's<sup>21</sup> 2005 appraisal of our proposed Peak District-wide lorry ban<sup>22</sup> demonstrated its environmental benefits; in surveys it was the top solution chosen by local people<sup>23</sup>. Consultation on the Longdendale Integrated Transport<sup>24</sup> Strategy found the most supported measure to solve congestion was an environmental weight restriction (89%) with the bypass coming second (81%).

3.1.2 MTRU's initial strategic assessment of our proposed travel demand management measures and Smarter Choices<sup>25</sup> (2014) demonstrated strong benefits compared to road building and clear evidence that they should undergo detailed appraisal. We presented them with a Park-wide HGV control system for consideration through the Trans-Pennine Routes Feasibility Study 2015. It is important in the context of what we wrote earlier about a flawed options appraisal to briefly describe why it was flawed.

3.1.3 Instead of following Government guidance (webTAG at the time) the scope of the trans-Pennine Feasibility Study addressed the symptoms not the problem. The geographical scope of the study interpreted trans-Pennine as '*connectivity between Manchester and Sheffield*', with the M62 excluded. National Park statutory purposes and policy were misunderstood and incorrectly applied.

3.1.4 The webTAG guidance towards generating and sifting options was not followed, and the assessment of the sifted options was not robust. As a result the study failed to maximise public transport, modal shift and smart choices, and minimise the need to travel, which would have contributed to wider sustainability and health objectives, and fulfilled Government policy<sup>26</sup>.

3.1.5 Initially the HGV control system was applied only to the A628T and HGVs were allowed to divert onto adjacent routes, instead of being confined as CPRE proposed to the motorway network around the Peak District. Despite these misinterpretations and incorrect scoring the HGV control system with complementary sustainable measures performed as well as other options that were taken forwards. However, the package was rejected due to '*difficulty of delivery*' (Stage 2 Annex 1 page 6).

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<sup>20</sup> South Pennines Integrated Transport Strategy 'The Way to Go' - CPRE Peak District and South Yorkshire Branch, 2004. Measures included Lorry weight restrictions; revitalised main roads; 20mph zones; safe routes to school and travel planning; good quality cycle infrastructure and cycle training for all children; improved access to rail; bus lane on A628; Peak District- wide Quality Bus Contract with promotion and marketing; traffic calming and 30 mph through villages; Hope Valley line passing loop; regional rail card; road pricing in Greater Manchester.

<sup>21</sup> [REDACTED]

<sup>22</sup> CPRE lorry control proposal on the A628 – Assessment by MTRU, 2005

<sup>23</sup> Travel Survey, Alternative Proposals for Transport & Save Swallows Wood, 2006; Longdendale Integrated Transport Strategy, Public Consultation Report, Tameside MBC 2010

<sup>24</sup> [REDACTED] LITS did not proceed due to withdrawal of Government funding.

<sup>25</sup> Final Report for the 2014 Trans-Pennine Routes Feasibility Study, incorporating the Interim Note of 31-7-2014 - Keith Buchan, Director of MTRU, 2014. Measures included HGV weight restriction; opportunities for local journeys using travel planning, new walking & cycling routes, car sharing, car clubs, raising travel awareness and providing information on rail and bus; enhancements to rail services; reallocation of road space to cyclists.

<sup>26</sup> National Planning Policy Framework paras 29 -41

3.1.6 Later in the study of options the HGV control system with complementary sustainable measures was tested again (Stage 2 para 5.4.22 & Stage 2 Annex 3, page 22). MTRU<sup>27</sup> was developing a package of measures on behalf of CPRE but this needed further information and co-operation from both DfT and Highways England in order to flesh it out. Neither were forthcoming. Consequently the 2014 CPRE package that was tested by the study was incomplete. In conclusion the Trans-Pennine Routes Feasibility Study proposed the A57 Link Roads alongside the Trans-Pennine Tunnel.

3.1.7 It is clear that (a) the webTAG key principles<sup>28</sup> were not followed (see Appendix B) and that (b) alternatives have not been properly tested as is required by the policy test of major development in a National Park. The latter is particularly important in the context of the EIA Regs<sup>29</sup>. *'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, **which are relevant to the proposed project and its specific characteristics**, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.'* (our emphasis).

### HGV control system

3.1.8 The most controversial element of CPRE's package for National Highways has been the HGV control system. In response to our and other interested parties' suggestion for an HGV control scheme National Highways produced a series of arguments against it (in italics below)<sup>30</sup>. We here counter them with facts and evidence.

*'The SRN has to provide unrestricted access to all vehicles up to 40tonnes'.* We can find no evidence that this is the case. It is within the Secretary of State's powers to restrict freight movements on a trunk route in order to realise environmental benefits such as avoiding danger to people or traffic, preserving or improving amenities of the area through which the road runs, and improving air quality. Alternatively the route could be de-trunked

*'Very difficult to deliver – stakeholders wouldn't like it because it would negatively impact connectivity and associated economic growth; difficult to enforce as it crosses too many administrative boundaries'.* High Peak Borough Council and Derbyshire County Council both raised it as a potential solution. Regarding economic growth, the case has to be made for each individual scheme that improving connectivity between two economic areas benefits either or both. As SACTRA (Standing Advisory Committee on Trunk Road Appraisal) showed in 1998<sup>31</sup> there is no guarantee that transport improvements will benefit the local or regional economy at only one end of the route - roads operate in two directions, and in some circumstances the benefits will accrue to other, competing, regions. The economy of the National Park which depends on its high quality landscapes lies between the economies of Sheffield and Greater Manchester. No attempt has been made to identify the impacts on economic growth that an HGV

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<sup>27</sup> Final Report for the 2014 Trans-Pennine Routes Feasibility Study, incorporating the Interim Note of 31st July 2014; prepared by Keith Buchan, Director of MTRU, on behalf of the Friends of the Peak District, September 2014

<sup>28</sup> webTAG Transport Analysis Guidance The Transport Appraisal Process, Guidance for the Technical Project Manager, Jan 2014, para 1.1.5

<sup>30</sup> 9.5 Comments on Relevant Representations page 72

<sup>31</sup> [REDACTED]

control system would have. HGV bans are now simpler to deliver with technologies such as ANPR.

*'HGVs would have to travel longer distances and would increase carbon emissions'*. The M62 route is twice the length of the A628 route but MTRU's assessment of the weight control system has shown that overall environmental benefits accrue despite the longer journey.

*'HGVs would be displaced onto unsuitable routes'*. This would not happen, as the control scheme we presented to NH in 2015 and through this Examination requires HGVs to use the motorway network around the PDNP.

*'Increased burden on police and trading standards enforcing the scheme'* - Resources would be required but savings on the external costs that HGVs impose on society and the environment would easily underwrite the additional cost of enforcement. HGVs are only paying a third of the costs they impose on the economy and society in terms of road congestion, road crashes, road damage and pollution costs<sup>32</sup>. HGVs are almost seven times more likely than cars to be involved in fatal collisions on minor roads. They are responsible for 17 per cent of greenhouse gas emissions and a fifth (21 per cent) of NOx emissions from road transport, despite making up just 5 per cent of vehicle miles. When the full costs of HGVs are taken into account that equates to a £6bn a year taxpayer subsidy.

*'Increased maintenance liability for local authorities due to increased HGV movements on local network'*. If the control system was applied as we proposed, there would be less HGV movements on local roads and reduced costs for the local authorities in terms of road maintenance.

### 3.2 SOLVING THE PROBLEM - THE ALTERNATIVE

3.2.1 The 2014 package of sustainable measures prepared by MTRU has been further developed and updated as *Car Free Low Carbon Travel for Longdendale and Glossopdale*. It has been informed by an online survey about the future of Longdendale. The most frequent concern of the 245 respondents was transport and travel with the majority seeking a reduction in the impact of cars and lorries<sup>33</sup>. We explored this concern in depth by capturing the travel experiences of both residents of, and visitors to, Longdendale and Glossopdale through one-to-one interviews and a questionnaire<sup>34</sup>.

#### Summary of Residents' Travel Experiences

3.2.2 Many people in the area already walked many local journeys but their experience would benefit from reduced car and lorry movements. The most difficult journey that could be walked, but was not, was that to the local supermarket for the heavy weekly shop. Cycling was not popular (except for leisure) due to the intimidating volume of traffic, sense of danger and the hilly terrain. Segregated routes and the sharing of quieter ways known to those who cycle regularly would encourage others. E-bikes are being considered but they do not address safety concerns and there are questions about their sustainability. Public

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<sup>32</sup> [REDACTED]

[REDACTED]

[REDACTED]

transport is costly with complex ticketing. Bus services are slow, unreliable and ‘go round the houses’. The train to Manchester provides a well-used and effective service. The bus and train services to Manchester Airport were considered good. However, both Mottram and Gamesley suffered from poor access to both bus and train services, and access to Stalybridge and Ashton needs to be improved.

3.2.3 For private cars, journeys using the trunk road or the A57 to Glossop experienced extended peak hour congestion. The easiest journeys by car headed east and south out of the area. Car sharing with friends and use of taxis in Gamesley occurred frequently, but carpooling and car clubs were poorly supported. Electric cars are on everyone’s horizon but their cost, range, lack of charging points and the sustainability of materials used in their construction were key concerns.

### **Summary of Visitors’ Travel Experiences**

3.2.4 Three issues stood out for visitors: the almost complete lack of public transport to visit Longdendale, particularly from the north; the dangerous junctions on the A628T road; and a lack of easily accessible and up-to-date travel information for all modes.

3.2.5 The majority of people do not consider travelling by bus or train as there is no convenient service – the only service is an infrequent Friday-only service from Holmfirth. Although the train service from Manchester to Glossop/Hadfield is used and essential for those without access to a car, the train journey from the Huddersfield area was particularly tortuous requiring three different trains. The majority would consider public transport if it was as direct, convenient and affordable as using the car, particularly if a bus allowed circular walks, was ‘hail and ride’ and ran into late summer evenings. The alternative of Park and Ride would be considered depending on its location.

3.2.6 Keen Sheffield cyclists are able to find off-road or quiet routes but for others, cycling in from elsewhere, off-road infrastructure is required to remove the sense of road danger. Several people are disappointed at the lack of space for carrying bikes on buses and trains. E-bikes are not popular.

### **The Green Travel Challenge – A local conversation**

3.2.7 Residents and visitors were engaged in the development of the alternatives through a virtual event with professional facilitation in October 2021. The event provided valuable insights and information which have been used to finalise *Car Free Low Carbon Travel for Longdendale and Glossopdale* proposals for the area<sup>35</sup>. The full report accompanies this written representation.

### ***Car Free Low Carbon Travel for Longdendale and Glossopdale***

3.2.8 The full report by MTRU accompanies this written representation as a standalone report. In summary the package consists of the following:

- a) An HGV control scheme for the National Park to remove through HGVs. This would need an area based approach and have two options: restricting only the heaviest (over 32 tonnes) or all HGVs (over 7.5 tonnes) except for access.

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<sup>35</sup> [REDACTED]



- b) Reconstruction of the A57 junction at Woolley Bridge to include a priority entry lane for buses and cyclists from the A57.
- c) Signalisation of the M67 roundabout
- d) Bus priority and service improvements
- e) Traffic calming through the villages including speed reduction
- f) Cycleway and footway improvements
- g) Local sustainable travel schemes such as Active Travel, bike-cargo, Travel to Work plans
- h) Public realm improvements to encourage walking
- i) Travel planning exercise to:
  - define place to place local cycle and walking routes (not necessarily the same)
  - set up new or improved bus services with initial incentives to try them
  - better integrate rail and bus services locally
  - improve links to TfGM networks for public transport and cycling
  - pilot bike and e-bike deliveries from local shops.

3.2.9 The overall impact of *Car Free Low Carbon Travel for Longdendale and Glossopdale* is contained in the MTRU report. The proposal presents a solution tailored to local circumstances that fulfils national<sup>36</sup>, regional<sup>37</sup> and local policy<sup>38</sup>. It is in accordance with Greater Manchester's Right Mix vision for no net increase in motor vehicle traffic and to reduce car's share of trips to no more than 50%, with the remaining 50% made by public transport, walking and cycling<sup>39</sup>. It would transform local neighbourhoods and make door-to-door journeys by bus, foot or cycle a realistic, attractive and convenient option, as required by NPPF 2021, 112 and NPSNN 3.15. With less traffic flowing more slowly in the settlements the public realm environment would encourage cycling and walking in line with Decarbonising Transport - *'By 2030 we will aim to have half of all journeys in towns and cities cycled or walked'*<sup>40</sup> - and Gear Change<sup>41</sup> the Government's cycling strategy. Bus journeys would be more frequent and reliable, an aim sought by Bus Back Better<sup>42</sup> the Government's Bus Strategy. Implementing our proposals would reinforce the changes in commuting, shopping and business travel accelerated by the pandemic, leading to improvements in public health and wellbeing. By diverting HGVs onto more suitable roads it would improve congestion, air quality and road safety, and reduce community severance.

3.2.10 Finally by reducing traffic through the Peak District National Park the CPRE proposal would fulfil NPSNN 5.152, the English National Parks and Broads UK Government Visions and Circular, and the PDNPA Core Strategy policies T1 and T2; and lead to enhancement of

<sup>36</sup> Decarbonising Transport - A better greener Britain page 53; NPPF 2021;

<sup>37</sup> Transport Strategy 2040, updated 2021, Appendix 1 The Right Mix Greater Manchester Combined Authority

<sup>38</sup> DCC LTP 2011-2026

<sup>39</sup>

<sup>40</sup> Decarbonising Transport - A better greener Britain page 53

<sup>41</sup>

Gear Change A bold vision for cycling and walking

<sup>42</sup>

Bus Back Better National Bus Strategy for England

the National Park. It would contribute to the PDNP Management Plan's<sup>43</sup> intention to create a '*low carbon sustainable transport offer for all*' across all modes.

3.2.11 In contrast the scheme would increase traffic, including through the National Park; would not change or improve public transport routes, service frequencies or passenger facilities; would lead to rat running on residential roads, worsening road safety and road danger with faster speeds and more crashes, and have a neutral impact on physical activity<sup>44</sup>. It would consequently be contrary to all the above mentioned policies.

3.2.12 NPSNN 2.25 recognises that different places require different approaches reflecting differences in local preferences and choices, and the scope for alternatives to road travel. *Car Free Low Carbon Travel for Longendale and Glossopdale* respects and reflects local differences, and would avoid all the adverse impacts of the A57 Link Roads on the environment.

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<sup>43</sup> Peak District National Park Management Plan 2018-2023 – Delivery Plan

<sup>44</sup> A57 Economic appraisal package Table 5-14

## PART 4 PLANNING BALANCE

### 4.1 INTRODUCTION

#### Legal and policy framework

4.1.1 NPSNN 1.3 requires the Secretary of State to determine the development in accord with NPSNN unless to do so would *'result in adverse impacts of the development outweighing its benefits'*. We will show this is the case and therefore the scheme should be recommended for refusal.

4.1.2 Although NPSNN 2014 is the primary policy framework to be used to determine the DCO application under the Planning Act 2008, the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regs) extend the requirements of NPSNN. We will refer to them frequently. We refer to the extant version of NPPF published July 2021.

4.1.3 We will also refer to NH's Licence which is a contract between the Secretary of State for Transport and the company on behalf of Parliament. It is a legal document containing statutory directions to NH against which the A57 Link Roads should be scrutinised. The expectations of NH are spelt out in the Foreword to the licence by the Minister for Transport at the time: *'Government remains responsible for strategic roads and Ministers will continue to be accountable for making sure that the network is managed responsibly, in a way that safeguards value for public investment, meeting the needs of road users, securing individual well-being and supporting economic purpose, both today and for future generations...*

*This document represents a crucial part of that system, by setting out the Secretary of State's statutory directions and guidance to Highways England. It makes clear, to both Highways England and the wider community of road users and stakeholders, what we expect Highways England to achieve and how they must behave in discharging their duties and in delivering our vision and plans for the network, set out in the Road Investment Strategy.*

*The Licence emphasises that the role of Highways England is about more than just complying with the letter of the law. We expect the company to go the extra mile in the way it engages with road users and collaborates with other organisations to develop shared solutions. And they must take a lead in promoting and improving the role and performance of roads in respect of broader communal responsibilities, such as the aesthetics of design, safety and the environment, as well as driving forward wider progress on technology and innovation.'*

#### Is an effect significant?

4.1.4 There is no definition of 'significant' or 'material' in NPSNN or in the EIA directive and Regs. The EIA Guidance<sup>45</sup> considers the issue of significance in some depth. *The concept of significance considers whether or not a Project's impact could be determined to be unacceptable in its environmental and social contexts. The assessment of significance relies on informed, expert judgement about what is important, desirable or acceptable with regards to changes triggered by the Project in question. At the same time, significance determinations should not be the exclusive prerogative of 'experts' or 'specialists': significance should be defined in a way that reflects what is valued in the environment by*

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<sup>45</sup> [REDACTED] 1.4.1-1.4.2

*regulators and by public and private stakeholders. A common approach used in EIA is the application of a multi-criteria analysis.*

*Common criteria used to evaluate significance include the magnitude of the predicted effect and the sensitivity of the receiving environment:*

- *Magnitude considers the characteristics of the change (timing, scale, size, and duration of the impact) which would probably affect the target receptor as a result of the proposed Project;*
- *Sensitivity is understood as the sensitivity of the environmental receptor to change, including its capacity to accommodate the changes the Projects may bring about.*

4.1.5 We have used these criteria, expert/specialist judgement and what is valued in the environment by regulators and by public and private stakeholders to identify what we believe to be significant.

#### **Greater Manchester Joint Plan is a material consideration**

4.1.6 The Greater Manchester Joint Plan – ‘Places for Everyone’ 2021 - should be a material consideration for the Examination.

4.1.7 The NPPF 2021 paragraph 48 sets out that local planning authorities may give weight to relevant policies in emerging plans according to:

- (a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- (b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- (c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

4.1.8 CPRE considers that the Greater Manchester ‘Places for Everyone’ 2021, the emerging Joint Development Plan of the nine local authorities, including Tameside, is a material consideration for the DCO hearing. The Joint Development Plan was at Publication Stage (Regulation 18) consultation in October 2021, and it is scheduled to be submitted in February 2022 to the Secretary of State to be subject to an Examination to test its soundness in 2022. This means it has reached Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission)<sup>[1]</sup>. Previous rounds of public consultations were on the Draft and the Revised Draft Greater Manchester Spatial Framework where there was significant objection to Green Belt land loss.

4.1.9 The Joint Development Plan also provides the strategic framework within which TMBC would develop its Local Plan.

4.1.10 The Tameside Local Plan has not been reviewed since it was adopted in 2004. It was saved as a Development Plan Document beyond its expiry date of 27 September 2007. Development of a new Local Plan commenced in 2016-2017 but has not progressed beyond

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<sup>[1]</sup> NPPF 2021, 221



## 4.2 EFFECTS OF THE SCHEME ON TRAFFIC

4.2.1 Understanding how the transport appraisal and traffic modelling has dealt with the effect of the scheme on traffic is fundamental to interrogating the environmental statement. The Transport Assessment Report submitted with the DCO process is too superficial to allow the necessary understanding. In response to repeated requests since March 2021 for information from National Highways we received four documents on 12 November 2021. These are:<sup>48</sup>

- Trans-Pennine Upgrade Stage 3 combined modelling and appraisal report
- A57 Economic appraisal package
- A57 Transport modelling package
- A57 Transport forecasting package.

4.2.2 As we refer to them we have submitted them to the Examining Authority. Even though they are technical documents they should be available to everyone for scrutiny. The public and/or third parties can only give a sensible opinion on environmental matters if they have access to the background data on projected environmental effects. If they are found to contain 'further information' as defined in regulation 3 of the EIA Regs, further consultation may be necessary.

4.2.3 We first present some concerns we have about the Transport Assessment Report and the consequences for the EIA; then assess the impacts of the changes in traffic flows which would create substantial adverse impacts on the environment and society.

### CONCERNS

4.2.4 **Omission of Greater Manchester and Sheffield Conurbations from the Study area -** The Area of Detailed Modelling<sup>49,50</sup> (ADM) and Affected Road Network<sup>51</sup> (ARN) exclude almost the whole of urban Sheffield, Barnsley, and the majority of Greater Manchester. *'The central Manchester and Sheffield areas have been excluded as these are highly sensitive to model noise<sup>52</sup>. This sensitivity could result in traffic using alternative routes for reasons unrelated to the TPU scheme, which could distort the assessment.'* Apart from Tameside, Glossop and Huddersfield the majority of the ADM is the rural Peak District, where traffic generally flows freely. By contrast Sheffield and Greater Manchester are congested leading to higher outputs of greenhouse gases (GHG) and air pollutants. The scheme increases traffic substantially within Tameside and between the two conurbations (on trans-Pennine routes). Beyond the ADM traffic impacts disappear into thin air. These exclusions appear illogical for a scheme aiming to improve connectivity between Greater Manchester and Sheffield City Regions<sup>53</sup>. Furthermore wider economic benefits in both Manchester and

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<sup>48</sup> Authored by Balfour Beatty Atkins all dates removed they are TPU Stage 3 combined modelling and appraisal report; A57 Economic appraisal package; A57 Transport modelling package; A57 Transport forecasting Package

<sup>49</sup> Figure 1 Transport Assessment Report

<sup>50</sup> A57 Economic Appraisal Package Figure 4-5 shows more clearly than the Transport Assessment Report the boundaries between the ADM and the difference between the ADM and the ARN. The A57 Transport Modelling package Figure 3-2 also shows the boundaries of the ADM.

<sup>51</sup> Transport Assessment Report Figures 2.1 & 7.8 ARN

<sup>52</sup> Transport Appraisal and Modelling 13.9.6

<sup>53</sup> The Case for the Scheme Table 3-5; Transport Assessment Report para 1.1.2

Sheffield are included in the economic assessment and add significantly to the Benefit Cost Ratio<sup>54</sup>. Yet such benefits in both these conurbations may not be realised due to congestion.

**4.2.5 Traffic model refinement** - The TPU Stage 3 combined modelling and appraisal report indicates that model refinement took place to alter the distribution of traffic within Glossop, and through Tintwistle.

*7.3.1 Initial air quality (AQ) modelling undertaken by Arcadis in July 2018 indicated that an unmitigated TPU scheme could have significant AQ effects and jeopardise the application for development consent. Changes in traffic flow and speed as a result of the scheme were predicted to cause exceedances of the AQ strategy objectives for annual mean nitrogen dioxide (NO<sub>2</sub>). The primary locations where a negative AQ impact was reported were the village of Tintwistle (A628) and the specific locations on the A57 route through Dinting Vale and Glossop High Street, as shown in Figure 7-1.*

*7.3.2. Atkins was commissioned by Highways England to undertake a review of the work done by consultants Arcadis at PCF Stage 3 for the proposed TPU scheme. The aim of this process was to strengthen the robustness of the modelling, under high levels of scrutiny for the Development Consent Order (DCO). Following the presentation of the review findings in the summer of 2019, Atkins was commissioned to implement its recommendations and finalise PCF Stage 3.*

4.2.6 The three locations where there would be a negative impact on air quality shown in Figure 7-1, are within the Tintwistle AQMA, within in the Dinting Vale AQMA and on Glossop High Street West. The modelling refinement was made using assumptions about the congestion on High Street West and created the 'Hadfield Alternative' (8.5.2; Figures 8-4 & 8-6) along Dinting Road and Shaw Lane. We do not know if the model refinement avoided breaching NO<sub>2</sub> levels since the complete results for the AQMAs are not presented and there were no modelled receptors on High Street West<sup>55</sup>.

**4.2.7 In the context of the above model refinement the traffic forecasting** results on the A628T east of Tintwistle and on Glossop High Street appear perverse. The trend on cross-Park links on the A628T between the Flouch and Chapel Brow on the eastern edge of Tintwistle is for traffic to increase. Comparing NH's modelled flows<sup>56</sup> with DfT's 2019 AADT shows that in 2025 without the scheme on road links between the Flouch and Chapel Brow in Tintwistle modelled flows did not follow the trend but decreased by 4-5% on two links and by 13% on the link immediately east of Tintwistle (the model results did not record a significant increase on the B6105, the only road that could have removed traffic from this third link) (see chart and table below). The 13% drop in modelled flows would impact directly on the Tintwistle AQMA.

4.2.8 No 2025 modelled AADT are available for the link through Tintwistle itself (between Chapel Brow and Millbrook). On the next link through Hollingworth, the 2025 traffic

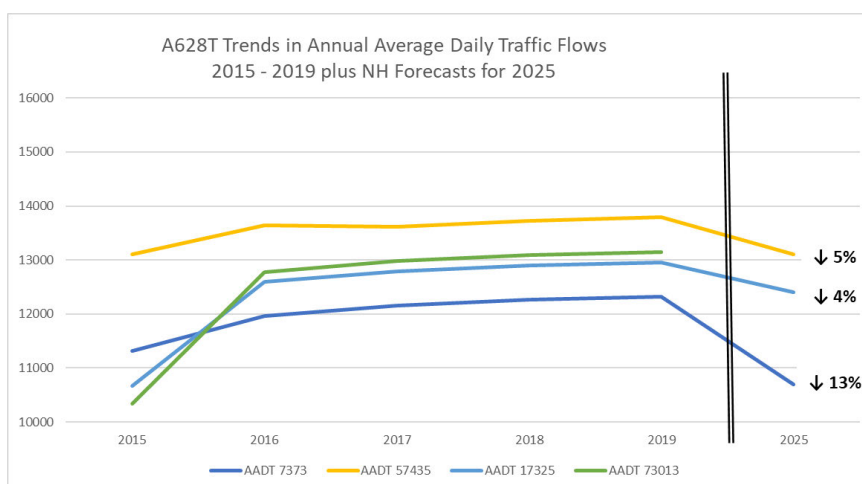
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<sup>54</sup> Economic Appraisal Package Table 6

<sup>55</sup> ES Figure 5.2(i) Sheet 2

<sup>56</sup> Appendix 2.1 Traffic data

modelling without the scheme increased the flows on the A628T by 9.5% above the 2019 DfT AADT.



4.2.9 On High Street West the AADT flows show a general increase between 2015 and 2019, as on the A628T. NH's modelled vehicle flows in 2025 on High Street West without the scheme are forecast to be ~11,550 AADT, a drop of 5,703 AADT or 33% which created the Hadfield Alternative (see table below).

AADT flows on road links on the A628T between Flouch and Tintwistle, and on High St West compared with modelled flows in 2025 in do minimum scenario				
DfT Road link number	Location of DfT road link	2019 DfT AADT	2025 NH modelled AADT	Absolute and % difference
73013	Flouch - LA boundary	13,148	NA	NA
17325	LA boundary - junction with A6024	12,956	12,400	-556 -4%
57435	junction with A6024 - junction with B6105	13,788	13,100	-688 -5%
7373	junction with B6105 -Chapel Brow	12,324	10,700	-1624 -13%
56546	High St West between junctions with A6016 and A624	17,704	11,550	-6,154 -35%

4.2.10 It appears that refinement of the traffic model could have altered the outcomes for the environmental statement accompanying the DCO application. The assumption that modelled traffic would follow new routes may be unrealistic. The full adverse impacts on air quality, the PDNP, landscape and Tintwistle Conservation Area that would continue to occur on the ground may be concealed by the modelling.

4.2.11 **Application of the Uncertainty Log (UL)** - We here only address the UL with respect to potential future highway schemes and housing and employment developments. MTRU's report on alternatives provides in depth scrutiny.



4.2.12 According to ES Ch.1-4 Introductory chapters '*details of future developments are included in the uncertainty log, which is appended to the Transport Assessment Report*' (TAR). These development assumptions are taken into account in Ch.15 Cumulative effects.

4.2.13 In the TAR, 4.1.4-4.1.9, the Uncertainty Log (UL) includes:

- *The Road Investment Strategy (RIS) and Local Authority highway schemes included in the TPS RTM (trans-Pennine South Regional Transport Model); and*
- *The housing and employment developments within the Area of Detailed Modelling boundary.*

No details of these schemes or developments are supplied or appended to the TAR.

4.2.14 ES Ch. 15 Cumulative Effects, 5.4.18-5.4.19, identifies that the largest Zone of Influence (Zoi) (5 km) was used to compile the long list of developments. The Zoi does not align with the Area of Detailed Modelling referred to in the TAR nor with the study area for air quality and GHG emissions. The high level list of inclusions in the UL is similar to that in the TAR but refers specifically to the '*traffic model uncertainty log*', which is not presented anywhere in the DCO documents. [The Case for the Scheme 6.2.2 also refers to the traffic model uncertainty log.] ES Appendix 15.1, Longlist of developments, includes only those for Tameside and High Peak Borough Councils.

4.2.15 From this it appears that :

- (a) RIS and Local Authority highway schemes are included in the transport model and those that lie within the 5Km Zoi are included in the assessment of cumulative effects;
- (b) Housing and employment developments that fulfilled the criteria with respect to uncertainty and lay within the Area of Detailed Modelling were used in the traffic modelling;
- (c) Only housing and employment developments in the vicinity of the scheme, ie within Tameside and High Peak, were included in the assessment of cumulative effects;
- (d) The transport model, which is not within the DCO documents, contains an uncertainty log.

4.2.16 The Transport Forecasting Report (TFR) supplied to us adds further information as follows:

- (a) a map (Figure 3-3) of the eleven local authorities (Kirklees, Barnsley, Sheffield, Rochdale, Oldham, Stockport, Salford, Trafford, Manchester, Tameside and High Peak) whose housing and employment developments were considered for the long list. The majority of these appear to lie wholly or partially outside the Area of Detailed Modelling;
- (b) RIS and Local Authority highway schemes in Appendix C;
- (c) A long list of developments in the eleven local authority areas in Appendix B pp 83-149;
- (d) Clarifies that all individual developments with the uncertainty status of 'near certain' or 'more than likely' within the immediate vicinity of the scheme, ie in Tameside and High Peak, were automatically included in the development matrices for the core scenario (TFR 3.6.6);
- (e) Identifies that all developments located in all other nine local authority areas considered for the UL long list had to meet the same criteria as those in Tameside and High Peak Boroughs, but also to pass certain thresholds - more than 200 dwellings for residential development; and for commercial development type B1 > 10,000 sqm, B2 > 1,500 sqm, and

B8> 5,000 sqm. All other commercial development types were included without the application of a threshold (TFR 3.6.6).

4.2.17 From this it appears that:

- The UL presented in ES Appendix 15.1 is incomplete;
- The local authority areas used to create the long list for the TFR extend well beyond the Area of Detailed Modelling used to create the long list for the TAR. It is therefore most unclear what has been included in the transport model in terms of housing and employment developments according to their location;
- Developments outside Tameside and High Peak Boroughs were included if they passed the uncertainty criteria and certain thresholds. Appendix B supplies commercial developments for 2015-2040 in square metres but the type B1/B2/B8 is not given. These types generate very different traffic flows. In Sheffield and Barnsley alone there are 51 employment sites of variable area that would pass the thresholds. How inclusion of these sites would impact on traffic flows is not apparent.

#### 4.2.18 Traffic Forecasts

The prediction of what would happen (the core scenario) without the scheme is based on forecasts from the DfT's National Trip End Model (NTEM). These overstate the general rate of traffic growth. Updated forecasts of future growth based upon the latest evidence have not been included in the transport modelling and the applicant admits that further sensitivity testing may be required. The evaluation thus understates the amount of induced traffic, i.e. the difference between traffic volumes with and without the scheme, as demonstrated by analysis of NH schemes post opening<sup>57</sup>. Average increases over the short term (3-7 years; seven schemes) were +7%. Average increases over the long term (8-20 years; six schemes) were +47%. These were increases over-and-above background traffic growth (measured by county and regional trends), and in most cases were across a screen line, to rule out reassignment effects.

**4.2.19 Journey times are misleading and inadequate.** No meaningful journey times with the scheme are provided<sup>58</sup> – only parts of journeys, (a) between M67 J3 and Glossop Crossroads; (b) between M67 J3 and Woodhead (A628); and (c) between Roe Cross and Glossop Crossroads (A57). The first two journeys avoid the substantial congestion in Greater Manchester (M60) and Sheffield (M1). Traffic generated by the scheme (an additional 8,000 AADT on weekdays) would contribute to this congestion. Travel time savings, vehicle operating cost and user charge benefits of £181m form the bulk of the estimated economic benefits<sup>59</sup>. Using partial journeys may grossly overestimate time savings. Journeys that reflect those likely to be made in reality should be assessed. As connectivity between the Manchester and Sheffield City regions is the first objective the journey between the two centres, or at the least between the M60 and the Sheffield inner ring road, should be given.

#### Conclusion

4.2.20 By omitting Greater Manchester and Sheffield from the transport model NH has substantially underestimated the scheme's impacts on the urban environment and its residents. The refinement of the traffic modelling needs to be explored in order to assess its

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<sup>57</sup> The End of the Road? *The Impact of Road Projects in England* Report for CPRE, 2017, Sloman et al

<sup>58</sup> Transport Assessment Report para 7.1.7

<sup>59</sup> Transport Assessment Report 2.4

validity and its impact on the environmental assessment. By understating the amount of induced traffic the scheme's impact on the environment has been underestimated. The scheme's value for money needs to be interrogated.

4.2.21 With respect to the UL, NH should:

- clarify the discrepancies between all three documents - the Transport Assessment Report, Ch 15 Cumulative Effects and the Transport Forecasting Report;
- supply the category of employment development (B1, B2 or B8) in order for the examination to understand how traffic generation by developments in the UL;
- list all the developments that have actually been included in the transport model and for assessment of cumulative effects.

Until we understand the data the results in the EIA can only be considered uncertain.

### THE IMPACT OF THE SCHEME ON TRAFFIC FLOWS<sup>60</sup>

4.2.22 The traffic flow changes on various roads with the scheme are summarised in the bullets and Table below.

- With the scheme in place in the opening year of 2025 substantial decreases in traffic are forecast on the bypassed routes A57T Hyde Road (85%), Mottram Moor A57T (43%) and Woolley Lane (76%). These decreases persist in 2040. They depend on implementation of effective traffic calming as through traffic would still be permitted.
- In Tameside substantial increases in traffic are forecast on the M67 (26%), on Market St a narrow residential street in Mottram (68%), and on A560 Stockport Rd (23%). The 2,250 AADT increase on Market St Mottram, with only increases of 350 AADT on Stalybridge Rd through Mottram, suggests that at the Mottram crossroads the extra traffic turns either left into Hyde Road or right to go to Mottram Moor new junction.
- In Glossopdale with the scheme in 2025 substantial increases, which persist in 2040, are forecast on the A57 Brookfield (31%) and A57 Snake Pass (38%), and on minor roads - New Road Tintwistle (50%), Norfolk Street (21%) and Dinting Rd (45%). Small but significant increases are also forecast on the A6016 Primrose Lane, A57 High St East, Shaw Lane and Cemetery Rd. All of these roads have households living adjacent to them and Dinting Road has a school crossing point. These are the routes that people use to walk or cycle to work, to school to the shops, to the doctor.
- Rat running through Broadbottom continues but with fewer vehicles (1,500 AADT less). With congestion increasing on the A57 at Brookfield rat running through Charlesworth and Broadbottom is likely to continue unabated.
- No traffic figures for Tintwistle are supplied. We are given two accounts. The impact of the slight increases in traffic on the A628T<sup>61</sup> through Tintwistle Conservation Area *'would not result in any perceptible change to the character, appearance or noise environment of the conservation area'*<sup>62</sup>. The Case for the Scheme para 7.8.5 claims *'The Scheme is expected to lead to a reduction in traffic within Mottram in Longdendale, Hollingworth and Tintwistle, which may increase walking and cycling in these localities'*.

<sup>60</sup> TAR Figures 7.1 and 7.2; ES Figure 2.4 Traffic Data.

<sup>61</sup> On the Street Atlas and maps the A628T is labelled Market St through Hollingworth, Manchester Road between Hollingworth & Tintwistle, Old Road & Church St in Tintwistle, Woodhead Road east of Tintwistle. The B6105 is also called Woodhead Road

<sup>62</sup> ES Ch.6 Cultural Heritage 6.7.38

- No traffic flows are given for Simmondley Lane which could also be a rat run to avoid congestion on the A57 Brookfield.
- Traffic flows are forecast to increase on trans-Pennine routes A628T and A57 but to reduce on the M62<sup>63</sup>. No detail is provided about routes for traffic diverted off the M62.

Location	Annual Average Daily Traffic without scheme in 2025	Changes in daily traffic with scheme in 2025	% change
M67 Godley	28,450	+7,500	+26%
A57T Hyde Road	19,200	-16,350	-85%
A57T Mottram Moor	29,200	-12,550	-43%
A628 Hollingworth	15,950	-50	-0.3%
A628T Crowden	10,700	+950	+9%
A628T near Salters Bridge	12,400	+850	+7%
A6024 Holmfirth	700	+100	+14%
Market Street Mottram	3,750	+2,550	+68%
A6018 Roe Cross Road	15,250	-1,600	-11%
A560 Stockport Road	2,350	+550	+23%
A57 Mottram Road	3,450	-300	-9%
New Road Tintwistle	800	+400	+50%
Woolley Lane	16,650	-12,700	-76%
A57 Brookfield	15,200	+4650	+31%
A626 Glossop Road	12,350	-850	-7%
A6016 Primrose Lane	8,700	+550	+6%
A57 High Street West	11,550	-300	-3%
A57 High Street East	14,550	+1,050	+7%
Norfolk Street	8,200	+1,700	+21%
Victoria Street	9,550	-100	-1%
Dinting Road	3,100	+1,400	+45%
Shaw Lane	6,900	+1,000	+15%
Cemetery Road	5,150	+600	+12%
A57 Snake Pass	3,050	+1,150	+38%

>10% increase in traffic

>10% decrease in traffic

- The volume and high percentage of HGVs are already a deterrent to pedestrian/cycling trips in the area. In Glossopdale absolute numbers of HGVs on local roads increase on all those roads seeing traffic increases, many of them are residential roads. The applicant recognises that *'Much of the heavy traffic travels along local roads, which disrupts the lives of communities, and makes it difficult and potentially unsafe for pedestrians to cross the roads'*<sup>64</sup>. The situation would be worse with the scheme.
- Conflict between strategic traffic passing through the area and local trips would remain. Through-traffic would meet local traffic on the trunk route between Tintwistle and Hollingworth and on Mottram Moor at the new junction.
- Mottram crossroads acts as a demand management tool (traffic flows on Mottram Moor have remained stable for the last decade despite the Transport Assessment Report 4.1.1 predicting traffic increases without the scheme). Removing its effect would encourage

<sup>63</sup> Transport Assessment Report para 7.2.13

<sup>64</sup> Transport Assessment Report 1.1.2

many people to use their cars not only from Glossopdale but trans-Pennine from the Sheffield city region.

#### **Failure to meet policy requirements**

4.2.23 NPSNN 2014 is based on the ‘*compelling need for development of the national road network*’ (para 2.22) and strong forecast annual average traffic growth on all roads in England<sup>65</sup>. As we show later NPSNN is out of date for many reasons; in this instance because it fails to support other national, regional and local policies which seek to restrict traffic growth. The SRN is not a system entire of itself. It is part of the whole road network with links to major and minor roads, as is shown so convincingly with the A57 Link Roads. If traffic is to reduce on these roads, then traffic on the SRN must follow suit, as is required by all the following policies.

4.2.24 Increasing road traffic, as the scheme would do, is contrary to (a) Decarbonising Transport, DfT, 2021; (b) Bus Back Better National Bus Strategy for England 2021 (c) NPPF 2021 para 104 (d) TfGM’s Transport Strategy 2040<sup>66</sup> Right Mix vision (e) South Yorkshire Mayoral Combined Authority’s Climate Emergency Framework<sup>67</sup> (f) PDNPA Core Strategy Adopted 2011 Policies T1 and T2; and (g) DCC’s LTP 3 2011-2025. Decarbonising Transport summarises the intent of all these policies. ‘*We cannot pile ever more cars, delivery vans and taxis on to the same congested urban roads. That would be difficult for the roads, let alone the planet, to tolerate. As we build back better from the pandemic, it will be essential to avoid a car-led recovery... We want to reduce urban road traffic overall*’ (page 6).

4.2.25 Some of the policies have specific targets to reduce traffic. ‘*By 2030 we will aim to have half of all journeys on towns and cities cycled or walked*’ (Decarbonising Transport page 53). The Right Mix vision aims for 50% of trips to be made by public transport walking and cycling, with no net increase in motor vehicle traffic, by 2040<sup>68</sup>. South Yorkshire Mayoral Combined Authority’s Climate Emergency Framework<sup>69</sup> seeks a 25% reduction in total travel demand by 2030; a 25% reduction in car miles by 2040; and a 30% reduction in freight miles by 2040.

4.2.26 This robust policy framework recognises the adverse impacts of motorised traffic on people’s quality of life. Car dependency leads to less active lives leading to obesity and cardiovascular disease. Intimidation of more vulnerable road users wishing to cycle or walk makes them more likely to travel by car. Motorised traffic causes severe traffic collisions and produces damaging air pollution, GHG emissions and noise. It severs communities and intrudes on landscape and townscape. It harms wildlife and habitats. As we have shown above the scheme increases traffic by up to 30% and will therefore worsen the existing situation for many people and the environment.

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<sup>65</sup> NPSNN Appendix B; DfT’s 2018 Road Traffic Forecasts

<sup>66</sup> Greater Manchester Transport Strategy 2040, published 2017, updated 2021, Appendix 1 Right Mix Technical Note is part of Places for Everyone, Greater Manchester Combined Authority’s emerging joint spatial strategy

<sup>67</sup> SCRCA Board meeting 27 Jan 2020 Item 12

<sup>68</sup> Greater Manchester Transport Strategy 2040, published 2017, updated 2021, Appendix 1 Right Mix Technical Note;

<sup>69</sup> SCRCA Board meeting 27 Jan 2020 Item 12

4.2.27 The public health costs of motorised traffic and car dependency are presented in later chapters. Here we draw attention to obesity. The statistics for Greater Manchester<sup>70</sup> follow the national trend for childhood obesity. A third of children aged 2 to 15 are overweight or obese and younger generations are becoming obese at earlier ages and staying obese for longer<sup>71</sup>. The percentage of adults classified as overweight or obese<sup>72</sup> in the North West is 66.5% but in Tameside it is 71.3% and in High Peak it is 61.6%<sup>73</sup>. Obesity is responsible for more than 30,000 deaths each year; it increases the risk of developing a whole host of diseases, depriving an individual of an extra 9 years of life. The overall cost of obesity to wider society is estimated at £27 billion (the amount the Government is investing in the roads programme). The UK-wide NHS costs attributable to overweight and obesity are projected to reach £9.7 billion by 2050, with wider costs to society estimated to reach £49.9 billion per year. Increasing physical activity is essential to address obesity but facilitating and encouraging car use, as this scheme would do, makes walking and cycling less attractive.

### Conclusion

4.2.28 The aim of all the above policies is to reduce traffic, especially in urban areas such as Glossopdale and the settlements in Longdendale, in order to reduce transport-induced climate change, noise and air pollution, and road collisions; and to improve everyone's quality of life, health and wellbeing through low traffic neighbourhoods and reduced car dependency. By increasing traffic the scheme is contrary to them all, and throws a heavy negative into the planning balance.

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<sup>70</sup> [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

## 4.3 EFFECTS ON SAFETY

### Summary of CPRE assessment

4.3.1 The increased risk of crashes and NH's dismissal of this risk is unacceptable<sup>74</sup>. Policy at all levels, including NPSNN, seeks an improvement, not a worsening, in road safety.

### Additional Information through Freedom of Information (Fol) requests

4.3.2 In order to clarify the existing situation, which was poorly presented by NH, we sought further information through Fol requests.

4.3.3 The Scheme provides a safety disbenefit costed at -£7.32m<sup>75</sup> due to a modelled predicted increase of 102 crashes<sup>76</sup> causing 6 deaths, 28 serious injuries and 128 slight injuries<sup>77</sup> over the 60-year appraisal period, or an average of 1.7 crashes per year. Figure 7.8 in the Transport Assessment Report, showing the spatial distribution of crashes according to their impact on the economic assessment, is of such poor quality that individual roads are difficult to discern.

4.3.4 We therefore asked NH for clarification of the safety costs. Through a Fol email on 19<sup>th</sup> October 2021 we received a table summarising the impacts on different parts of the network (replicated below) and a figure of very poor quality indicating the sections covered by each column of the table (below). The legend shows that in the table below 'core' applies to the bypassed sections of the trunk road, the non-bypassed Mottram Moor and Woolley Lane; A57 'Snake Pass' applies from Glossop High Street East just east of the traffic lights to the urban edge of Sheffield; 'Glossop' applies to the A57 through Glossop from its junction with A626 Glossop Road to just east of its junction with Norfolk Road; and 'A628' applies to the trunk route through Tintwistle and the PDNP to the Flouch roundabout, and to the B6105 Woodhead Road between Glossop and its junction with the A628 trunk road.

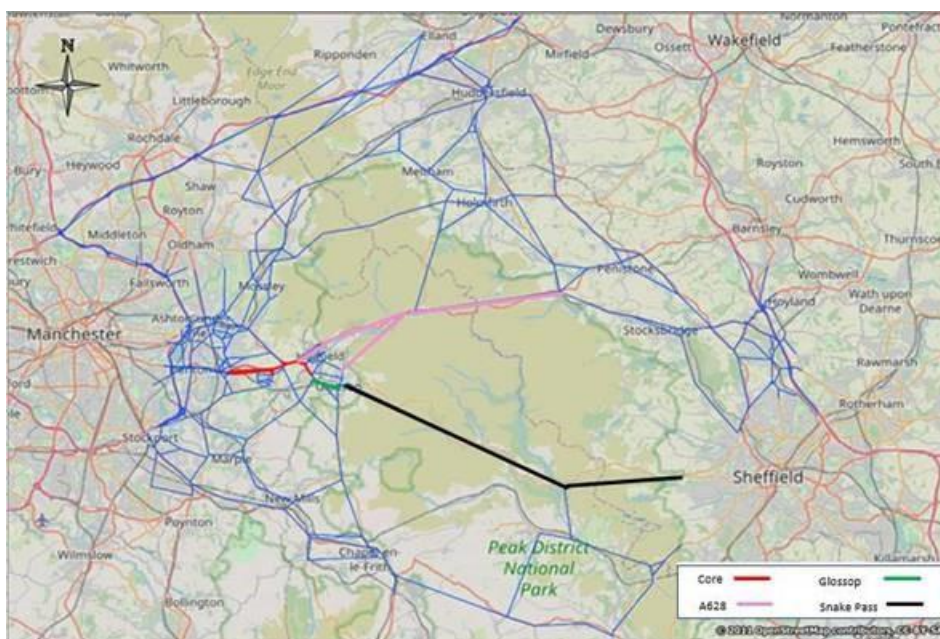
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<sup>74</sup> Case for the Scheme 4.5.1-4.5.8; Transport Assessment Report 7.2.8-7.2.14

<sup>75</sup> Transport Assessment Report 7.2.3

<sup>76</sup> In line with the Parliamentary Advisory Council for Transport Safety (PACTS) Safe Roads for All report Aug 2021, we do not use the word accident or collision. The word accident implies inevitability and no blame, and is generally not used by road safety professionals. Deaths and injuries have causes that can be prevented. Crash is a preferred term. The term road accident also, understandably, causes offence to many road victims who are concerned to know the causes of crashes that have killed and maimed loved ones, and want to know that causes are being prevented to save lives. NH continues to use the word accident.

<sup>77</sup> Transport Assessment Report Table 7.3



Location	Core	Snake Pass	Glossop	A628	Rest of Network	Whole Network
Forecast impact on accident numbers	+3	+163	+19	+34	-118	<b>+102</b>
Value of changes to accident numbers (PVB)	-£0.7m	-£8.5m	-£0.6m	-£1.8m	+£4.3m	<b>-£7.3m</b>

4.3.5 From the map and costings above it appears that the roads with increased crashes include the M67, the A57T and Woolley Lane; the A57 through Glossop; the A628T and the B6105; in addition to the Snake Pass.

4.3.6 In order to understand the existing situation we obtained data on crash incidents on the A57T between the M67 J4 roundabout and the Gun Inn junction, and on the A628T between the Gun Inn junction and the Greater Manchester boundary, from the Greater Manchester Police for the years 2000-2019. We asked NH for crash data on the A57T/A628T between the M67 J4 roundabout and the Fouch roundabout for the years 2000-2019. We received the results for the years 2014-2018 inclusive. We obtained crash data on the A57 Snake Pass between Glossop and the Derbyshire boundary at Hollow Meadows for the years 2000-2019 from the Derbyshire Police.

#### Increased crashes on the SRN (Strategic Road Network)

4.3.7 The risk of crashes increases on Mottram Moor, across the A628/A616T to the M1, and on the M1 south of J35A. The severity of the crashes which are predicted to occur on the new link road may increase due to increased speed<sup>78</sup>.

<sup>78</sup> Transport Assessment Report 7.2.2; ES Chapter 12, Population and Human Health 12.7.39 makes only fleeting reference to the operational impacts of the scheme on safety and risk of injury and death. These are through changes in traffic levels and an unawareness of altered traffic movements, particularly by sensitive road users; and from reduced traffic through Mottram village.

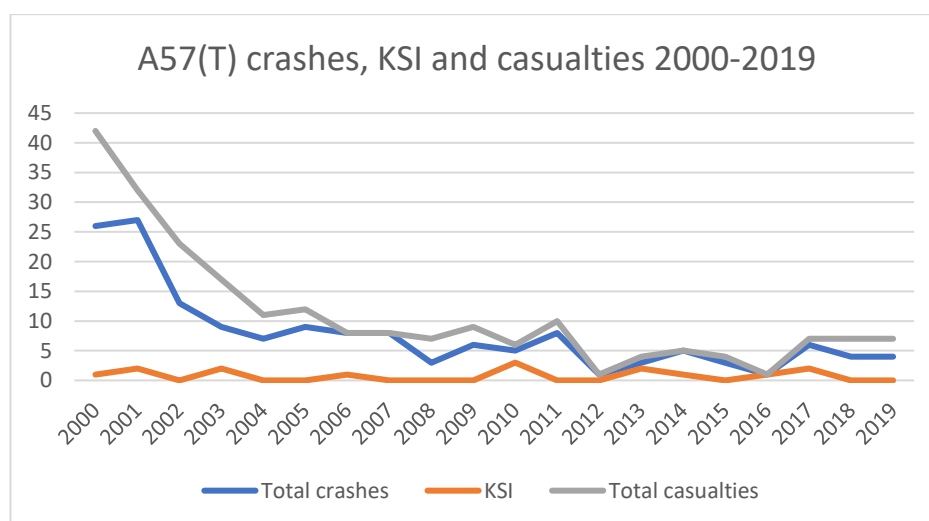


4.3.8 Although there is no specific safety objective for the A57 Link Roads, ‘the purpose of the scheme (together with other proposed TPU works being advanced separately to this DCO) is to address longstanding issues of connectivity, congestion, reliability and safety of strategic Trans-Pennine routes between the M67 at Mottram in Longdendale and M1 Junction 36 and Junction 35A North of Sheffield’<sup>79</sup>.

4.3.9 Crash and casualties figures from the Greater Manchester Police for the A57(T) between the M67 J4 and the Gun Inn junction and on the A628T between Woolley Lane and the GM/DCC boundary are presented in the table and two charts below. They suggest the crashes on these two stretches of road are already low.

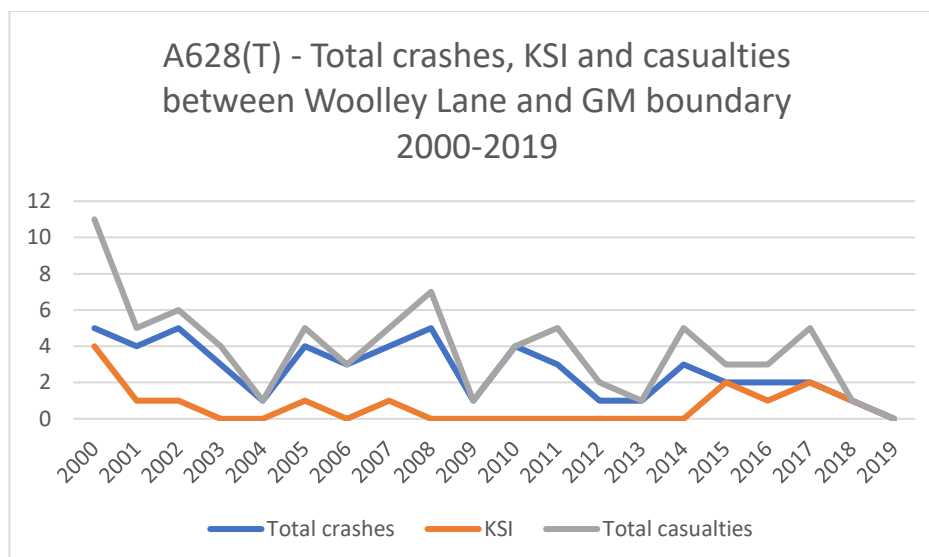
4.3.10 With a baseline of such low numbers of crashes and serious casualties it is difficult to discern improvement in safety risks. For example, during the 5-yr assessment period there were only 2 incidents involving pedestrians and 2 incidents involving cyclists in Mottram and Roe Cross<sup>80</sup>.

	A57(T) stretch in GM						A628(T) from Woolley Lane to Boundary					
	Crashes			Casualties			Crashes			Casualties		
	Fatal	Serious	Slight	Fatal	Serious	Slight	Fatal	Serious	Slight	Fatal	Serious	Slight
2014		1	4		1	4			3			5
2015			3			4		2			2	1
2016		1			1			1	1		1	2
2017		2	4		2	5		1	1		2	3
2018			4			7		1			1	
<b>Total</b>	<b>0</b>	<b>4</b>	<b>15</b>		<b>4</b>	<b>20</b>	<b>0</b>	<b>5</b>	<b>5</b>	<b>0</b>	<b>6</b>	<b>11</b>



<sup>79</sup> The Case for the scheme 3.1.1

<sup>80</sup> The Case for the Scheme 4.5.11-4.5.19



4.3.11 More widely on the SRN, the scheme causes diversion of traffic off the safer M62, with increased crashes on trans-Pennine routes. The increased crashes on the A628T appear despite the A628 Safety and Technology improvements, which focus on addressing crash hotspots and the provision of electronic signs<sup>81</sup> and were included within the baseline ‘do minimum’ scenario<sup>82</sup>. Despite the increased risk of crashes on the trunk route and the M1 no mitigation measures are proposed although safety is a concern on the M1 between Junctions 32 and 34<sup>83</sup>.

4.3.12 NH states that young males and motorcyclists are at greatest risk from crashes with the scheme. However, the figures supplied to us by NH under FoI indicate that on the SRN the predominant vehicle type involved in crashes is the private car. In the urban area 84% of the 44 crashes between 2014 and 2018 involved the car (37/44, with 1 HGV and 3 motorcyclists). In the rural area 74% of the 73 crashes involved the car (54/73, with 12 HGVs and 4 motorcyclists).

#### *Failure to meet policy and statutory requirements*

4.3.13 By increasing crashes on the SRN, including on Mottram Moor east of the new junction and on Market Street in Hollingworth, the applicant has failed to meet the scheme objective to improve safety on the A628T corridor and the requirements of (a) the NPSNN 2014; (b) the Strategic Framework for Road Safety 2011, paras 1.21 and 1.27<sup>84</sup>; (c) the DfT’s The Road Safety Statement 2019 A Lifetime of Road Safety<sup>85</sup>; (d) National Park policy T1 and T2; (e) Transport for the North’s Strategic Transport Plan 2019 pages 38 & 61; and (f) the NH licence agreement, as follows.

4.3.14 NPSNN makes frequent references to safety. One of the Government’s strategic objectives for the National Networks is ‘*Networks which support and improve journey quality, reliability and safety*’ (para 2). ‘*Individual schemes will be brought forward to tackle specific issues, including those of safety, rather than to meet unconstrained traffic growth*

<sup>81</sup> The Case for the Scheme 2.1.9

<sup>82</sup> ES Ch1-4 Introduction 2.4.6-2.4.9; 3.4.5

<sup>83</sup> London to Scotland East Route Strategy 2017 Highways England

<sup>84</sup>

<sup>85</sup> The Road Safety Statement 2019 A Lifetime of Road Safety, DfT para 4.9

(i.e. ‘predict and provide’)’ (para 2.24). Development of the road networks should be designed to minimise social and environmental impacts and improve quality of life (para 3.2), in accordance with the principles of the NPPF 2021 (para 3.3).

4.3.15 However, the applicant appears to have had little regard to NPSNN, its own Safety Framework for the Strategic Road Network or the national *Strategic Framework for Road Safety* (NPSNN 4.64). It has not, as it is required to do:

- minimised the risk of death and injury arising from their development;
- contributed to an overall reduction in road casualties;
- contributed to an overall reduction in the number of unplanned incidents; and
- contributed to improvements in road safety for walkers and cyclists.

4.3.16 TfN’s Major Roads Report sees ‘*improving safety (and quality) as fundamental objectives for TfN partners in managing their road networks*<sup>86</sup>’.

4.3.17 Finally, safety within the Parks is a key issue<sup>87</sup>. The aim is to reduce intimidation by traffic, not increase it, and reduce the number of livestock and wildlife killed or injured in crashes. However the applicant’s assessment took no account of the impact of intimidation on vulnerable users – walkers, cyclists and horse riders – who could be prohibited from using routes adjacent to, or that cross, the A628T cross-Park route; or on the impacts on wildlife within the National Park.

4.3.18 Finally the scheme’s increase in crashes is contrary to the requirement of NH’s Licence (Para 4.2) ‘*The Licence holder must, in exercising its functions and complying with its legal duties and other obligations, act in a manner which it considers best calculated to:*

*e. Protect and improve the safety of the network;*

*h. Conform to the principles of sustainable development, which is defined in para 4.3 for the purposes of this section ... as encouraging economic growth while protecting the environment and improving safety and quality of life for current and future generations’.*

4.3.19 The Secretary of State before granting development consent must be satisfied that all reasonable steps have been taken and will be taken to minimise the risk of road casualties arising from the scheme; and contribute to an overall improvement in the safety of the Strategic Road Network (NPSNN 4.66). In this instance given all of the above evidence he cannot be satisfied and should refuse the DCO.

#### **Increased crashes on the local road network**

4.3.20 Although some local roads benefit from improved safety, with the scheme a number of roads would now have an increased risk of crashes (Figure 7.8 Transport Assessment Report). These include the A6013, A6187 and A625 to Sheffield, rural roads passing through the villages of Bamford and Hathersage. There are also routes to the north of the scheme A635 through Mossley, Uppermill, Delph and Denshaw, and the A6024 through Holmfirth and other villages to Huddersfield, which also have an increased risk of crashes. The risk of

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<sup>86</sup> Major Roads Report, TfN published December 2021

<sup>87</sup> English National Parks and the Broads: UK Government Vision and Circular 2010 Paragraph 88

crashes increases on the A628 non-trunk to and through Penistone, a small market town, and on the A6024 to Hayfield.

4.3.21 The table of the safety disbenefits costs supplied to us under FoI by NH indicates increased crashes within Glossop. Many of these roads are residential streets used by pedestrians and cyclists to get to school, work, the shops and leisure outlets. Increased traffic would increase intimidation and the sense of road danger, encouraging people to use their cars. Although perversely this would reduce the number of crashes, it would undermine improvements to physical activity so crucial to addressing obesity and the long term health of the population from cradle to grave, and to improving wellbeing.

4.3.22 NH directly relates predicted increases in traffic with a modelled predicted increase in accident numbers over the 60-year period of assessment of the scheme<sup>88</sup>. However NH has excluded residential roads on *'which the scheme is not expected to have an impact'*<sup>89</sup>. Within Glossopdale, assuming the increased traffic is accompanied by increased crashes as the applicant has stated, all the local roads listed in the table below could see increased crashes. One of them Roe Cross Road would see an increased risk of crashes, according to Figure 7.8, despite an 11% fall in traffic and an already low rate of crashes (The Case for the Scheme 4.5.18).

Location	AADT without scheme in 2025	Changes in AADT with scheme in 2025	% change
A57T Mottram Moor	29,200	-12,550	-43%
A628 Hollingworth	15,950	-50	-0.3%
A628T Crowden	10,700	+950	+9%
A628T near Salters Bridge	12,400	+850	+7%
A6024 Holmfirth	700	+100	+14%
Market Street Mottram	3,750	+2,550	+68%
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A560 Stockport Road	2,350	+550	+23%
A57 Mottram Road	3,450	-300	-9%
New Road Tintwistle	800	+400	+50%
A57 Brookfield	15,200	+4650	+31%
A626 Glossop Road	12,350	-850	-7%
A6016 Primrose Lane	8,700	+550	+6%
A57 High Street West	11,550	-300	-3%
A57 High Street East	14,550	+1,050	+7%
Norfolk Street	8,200	+1,700	+21%
Victoria Street	9,550	-100	-1%
Dinting Road	3,100	+1,400	+45%
Shaw Lane	6,900	+1,000	+15%
Cemetery Road	5,150	+600	+12%
A57 Snake Pass	3,050	+1,150	+38%

>10% increase in traffic

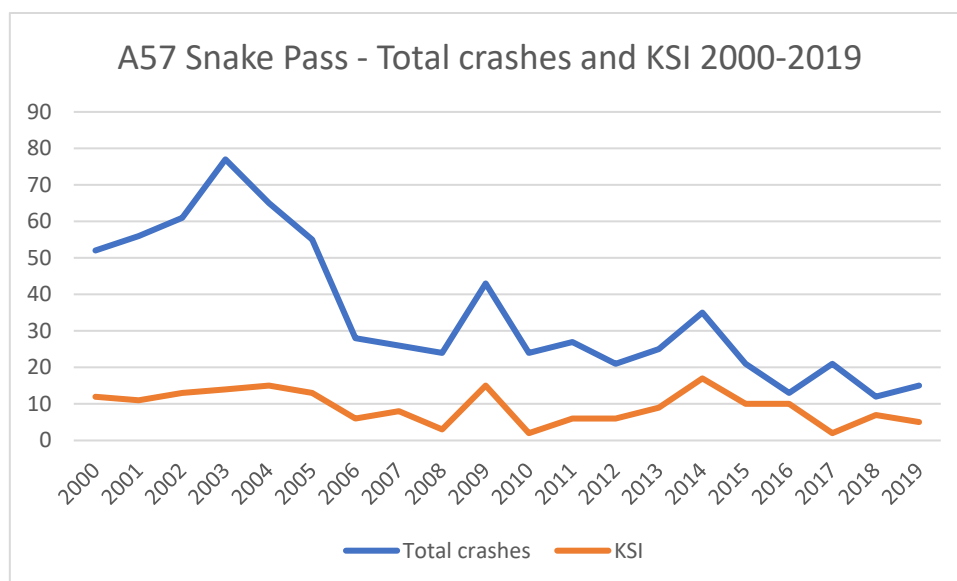
>10% decrease in traffic

<sup>88</sup> The Case for the Scheme 4.5.7

<sup>89</sup> The Case for the Scheme 4.5.2

4.3.23 The predominant increased risk of crashes falls on the A57 Snake Pass which 'is forecast to experience a modelled predicted increase of more than 160 accidents over the 60-year appraisal period, as a result of increased flows in the DS scenario. This alone exceeds the total impact across the rest of the network combined<sup>90</sup>'. The route is the responsibility of Derbyshire County Council. The A57 Snake Pass is classified by EuroRAP on its 2017-2019 results map as a persistently high risk rural road<sup>91</sup>. The number of crashes and type of casualties on the A57 Snake Pass between Glossop and the Derbyshire boundary at Hollow Meadows were obtained from the Derbyshire Police. The results are displayed in the table and chart below.

A57 Snake Pass						
Year	Crashes			Casualties		
	Fatal	Serious	Slight	Fatal	Serious	Slight
2014	3	8	24	3	14	40
2015	0	9	12	0	10	27
2016	1	4	16	3	8	24
2017	0	2	11	0	2	14
2018	2	5	14	2	5	19
<b>Total</b>	<b>6</b>	<b>26</b>	<b>77</b>	<b>8</b>	<b>39</b>	<b>124</b>



4.3.24 Since 2007 a 50mph speed limit has been in place, enforced intermittently by mobile speed cameras. Although there appears to be a trend in falling numbers of crashes and casualties the numbers of killed and seriously injured have continued at much the same level. The measures to reduce speeding have created substantial clutter on a route that passes through the wilder Natural Zone of the Park. Any further measures requiring signage or other road furniture would cause further harm to the special qualities for which the National Park was designated.

<sup>90</sup> Transport Appraisal 7.2.11-7.2.13

<sup>91</sup> [REDACTED]

4.3.25 Drivers on the rural A57 Snake Pass are particularly at risk of crashes. The highest number of fatalities occur on rural roads, particularly among young car drivers aged 17-24<sup>92</sup>. These roads carry 44% of all traffic but are where 33% of all casualties and 60% of all fatalities occur. NH states that young males and motorcyclists are at greatest risk from crashes with the scheme. Although incidents with motorcycles are higher on the Snake Pass than the national average, according to the figures supplied to us by Derbyshire Police, the majority of crashes (67%) on the Snake Pass involve cars - 18% involve motorcycles.

4.3.26 No mitigation is offered by NH for these impacts. The applicant appears only concerned with safety on the trunk road and dismisses crashes caused by its scheme on the wider network. *'Road safety is something the Applicant takes very seriously. The new link roads will be safer in comparison to the current layout... However safety features in areas outside the Scheme are not within the Applicant's remit.'* (Consultation Report Appendix Y page 167). Through the comments on relevant representations NH now says it would collaborate with DCC to investigate what safety improvements could be introduced. With respect to the Snake Pass, this would also require collaboration with the PDNPA. The clutter of road furniture on the Snake Pass is already harming the special character of the Park and needs to be reduced, not increased.

#### *Failure to meet policy and statutory requirements*

4.3.27 By increasing crashes on the local road network, NH has failed to meet the requirements of policy in the NPSNN, the Strategic Framework for Safety DfT's The Road Safety Statement, National Park policy, DfT's The Road Safety Statement 2019, and Transport for the North's statutory Strategic Transport Plan, as detailed above but also local highway authority goals for road safety and the requirements of its licence agreement, and as follows.

4.3.28 Every Local Highway Authority with responsibility for the roads that would see increased crashes unanimously seek reduction of road crashes and casualties –

- DCC LTP 3 2011-2026;
- South Yorkshire Mayoral Combined Authority<sup>93</sup>, which aims to improve safety on the network for all users. *'Safety for all road users must remain of paramount importance'*;
- South Yorkshire Local Transport Plan aims to maximise safety<sup>94</sup>;
- Sheffield City Council Transport Strategy (2018)<sup>95</sup>;
- Kirklees MBC 2025 Transport Vision<sup>96</sup>;
- GMCA's *'ambition'* is *'To reduce deaths on our roads as close as possible to zero (by 2040)*<sup>97</sup>.

<sup>92</sup> DfT's The Road Safety Statement 2019 A Lifetime of Road Safety 4.1

<sup>93</sup> Roads Implementation Plan 2020 SY MCA

<sup>94</sup> SY LTP 2011-2026 7.1-7.15

<sup>95</sup> Transport Strategy 2019-2035 Sheffield CC

<sup>96</sup>

<sup>97</sup> Transport For Greater Manchester, 2040, revised Jul 2021

4.3.29 Although NH is only responsible for the SRN it is expected to cooperate with government agencies, the devolved administrations, local government, enforcement authorities, a host of other public and private bodies, and road users to improve road safety<sup>98</sup>. NH's licence (2015) requirements reflect this cooperation. It is expected but has not had due regard to the need to protect and improve the safety of the network as a whole for all road users including *'taking opportunities to engage with and support wider efforts to improve safety for road users'* (para 5.15). This cooperation is reflected in a duty under section 5(1) of the Infrastructure Act 2015, with other persons or organisations in order to:

- a. Facilitate the movement of traffic and manage its impacts;
- c. Take account of local needs, priorities and plans in planning for the operation, maintenance and long-term development of the network (including in the preparation of route strategies, as required at 5.13);
- d. Provide reasonable support to local authorities in their planning and the management of their own networks.

4.3.30 On the evidence before us it has failed to meet its duty under section 5(1) of the Infrastructure Act 2015.

### Conclusion

4.3.31 NH has failed to address the policy, statutory and legal requirements for improved safety on both the SRN and the local road network. It has presented poor quality evidence in its figures making it difficult to understand the safety disbenefits. It has excluded residential roads from its analysis when according to its own evidence the scheme may increase the risk of crashes on these roads. It has accepted increases in crashes on both the SRN and the local road network without proposing mitigation measures. It has allowed diversion of traffic off safer motorways onto roads with higher risk of crashes. The increase in crashes on both the SRN and the wider network is contrary to national, regional and local policy and statutory requirements of its licence. Anomalies with the traffic modelling and forecasting could also be leading to spurious results. In any other sector safety would come first.

4.3.32 In financial terms, the average cost of a Road Traffic Accident is £90,4242, with the cost of a fatal accident being £2,130,922, but this is insignificant compared to the distress and grief suffered by the victims, their families and friends<sup>99</sup>. NH attempts to minimise the significance of increased crashes – *'the forecast increase in accidents equates to less than a 0.3% increase across the appraised network'* – misses the point. The policy and contractual requirements require no increase in crashes or worsening of safety risks at the very least.

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<sup>98</sup> DfT's The Road Safety Statement 2019 A Lifetime of Road Safety

<sup>99</sup> Roads Implementation Plan 2020 SY MCA [REDACTED]

## 4.4 EFFECTS ON GREENHOUSE GAS EMISSIONS

### Summary

4.4.1 In the context of a climate emergency and the need for rapid and urgent reduction in GHG emissions, the scheme's increase in carbon emissions is unacceptable, and weighs heavily against the scheme in the planning balance.

### CONTEXT

#### Study area for carbon emissions is unclear

4.4.2 The definitive statement on the study area for carbon emissions appears in ES Ch 14 Climate Effects. *'The study area for construction and operational maintenance is not limited to the geographic extent of the Scheme itself, as many emissions will result from upstream, downstream, and off-site activities such as materials production. It comprises GHG emissions associated with project construction related activities and materials and their associate maintenance, for operational road user GHG emissions, the study area is consistent with the affected road network defined in the traffic model<sup>100</sup>'.*

*'The study area for assessing the Scheme's vulnerability to climate change is based on the Development Consent Order (DCO) boundary<sup>101</sup>'.*

4.4.3 The study boundary for assessing the vulnerability to climate change is clear. NPSNN 4.40 when addressing climate adaptation requires *'applicants must consider the impacts of climate change when planning location, design, build and operation'*. Therefore the study area for climate adaptation should be the same as that for the construction and operational emissions but it is not.

4.4.4 The statement for assessing the construction and operational emissions is vague and confusing. Whilst the study area for road user GHG emissions is 'consistent' with the affected road network (ARN)<sup>102</sup>, this statement is not consistent with the study area as defined in the Economic Appraisal Package Figure 4.8, which omits the north eastern corner of Greater Manchester. Neither the boundary of the ARN nor the Area of Detailed Modelling, nor the study area for GHG emissions in the Economic Appraisal is coincident with any geographical area used for accounting carbon emissions ie local or combined authority areas. It is therefore difficult to understand how carbon emissions have been assessed and if they have been assessed correctly.

#### Carbon emissions may be underestimated

4.4.5 Elsewhere we have argued that the transport modelling may have underestimated traffic effects. Therefore the GHG emissions may also be underestimated. The Appraisal Summary Table (AST) 2019<sup>103</sup>, used to present the Business Case for the scheme and obtain funding, provides a cogent example of how underestimated carbon emissions can be. In the AST emissions are given as 3,529 (no units) in the opening year with 284,977 over 60 years. This represents a 40% underestimate of the scheme's carbon emissions over 60 years as

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<sup>100</sup> ES Ch. 14, 14.5.1

<sup>101</sup> ES Ch. 14, 14.5.4

<sup>102</sup> Case for the Scheme Fig 4-8

<sup>103</sup>



presented in the DCO where they are 401,026tCO<sub>2</sub><sup>104</sup>. This could mean the value for money for the scheme is overstated. The report on alternatives addresses carbon pricing in greater detail.

4.4.6 Embodied/construction carbon emissions of 38,970tCO<sub>2</sub>e<sup>105</sup> may also be an underestimate. The University of Leeds has developed the Barratt formula as used by the Climate Change Committee<sup>106</sup>. *"The upper and lower estimates for annual government infrastructure expenditure are multiplied by the embodied carbon intensity of construction for the equivalent year to calculate the absolute embodied emissions of the NIP. Before multiplying the expenditure by the carbon intensity, the gross value added, which is mainly paid wages, must be removed to get a figure representative of physical inputs only (i.e. carbon is not embedded in workers). To do this we take the proportion of the construction sector's spend on gross value added from the UK National Accounts for the year 2012 and assume that this proportion is valid for the years 2013-2021. In 2012, the percentage of construction expenditure on gross value added was 42.6%. In addition, the expenditure values are deflated to the year 2010's prices, since the carbon intensity figures refer to prices for that year. The cumulative embodied emissions using the top-down approach are estimated to be 243,831 kt CO<sub>2</sub>e for the desired NIP spend and 104,220kt CO<sub>2</sub>e for the NIP spend on projects under construction."* Carbon intensity is estimated for 2021 as 0.98kgCO<sub>2</sub>/£ as in table below.

**Table 1: Carbon intensity, spend and embodied emissions of the UK's NIP to 2021**

	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Carbon intensity (kgCO <sub>2</sub> e/ £)	1.11	1.09	1.08	1.06	1.04	1.03	1.02	1.01	0.99	0.98
Total NIP expenditure minus wages at 2010 prices (£M)			27,184	28,314	24,386	24,074	25,194	19,512	19,045	71,451
NIP expenditure minus wages at 2010 prices (£M) for projects under construction			23,963	20,779	15,134	13,135	11,133	4,945	4,755	6,856
Embodied emissions for desired expenditure (Kt CO <sub>2</sub> e)			29,334	30,120	25,580	24,906	25,194	19,670	18,929	70,098
Embodied emissions for projects under construction (Kt CO <sub>2</sub> e)			25,857	22,104	15,875	13,589	11,363	4,980	4,726	5,726

4.4.7 Applying the Barratt formula to the A57 Link Roads, which would cost £181.6m, the estimated embodied carbon would be **100,450tCO<sub>2</sub>**. There are two methods for estimating embodied carbon, a bottom-up life-cycle assessment (LCA) and top-down environmentally-extended input-output analysis (EE-IOA), which the Barratt formula uses. LCAs are conducted by collecting primary emissions data at every stage in the lifecycle of a process or product. This is in contrast to EE-IOA which redistributes on-site emissions data reported at 100 or so aggregated sectors (depending on the model used) by countries to the equivalent number of final products through monetary trade transactions. LCA is therefore more product specific yet due to the complexity and number of supply chain components involved, is restricted to measuring a proportion of the full upstream effects, whilst

<sup>104</sup> Table 14.15 - revised

<sup>105</sup> ES Ch. 14, Table 14.13 – revised

<sup>106</sup> Embodied greenhouse gas emissions of the UK National Infrastructure Pipeline (NIP), Kate Scott, Jannik Gieseckam, Anne Owen and John Barrett, University of Leeds, UK, May 2015

excluding others. On the other hand, EE-IOA provides a ‘boundary-less’ system in which all emissions are captured, yet it is constrained by aggregated sector representation.

4.4.8 An alternative estimate used construction carbon figures from 11 National Highways schemes<sup>107</sup>. Construction carbon ranged from 60-730 tCO<sub>2</sub>e per £1 million expenditure, with an average of 456 tCO<sub>2</sub>e per £1 million. Using this average, construction carbon for the A57 Link Roads would be 82,810tCO<sub>2</sub>.

4.4.9 The amount of embodied carbon associated with the scheme appears to an underestimate.

#### **Recent legal case with implications for carbon assessment**

4.4.10 The case is the quashing of a DCO for the A38 Derby junctions by the High Court on 8th July 2021<sup>108</sup>. Following that judgment, the Secretary of State must now re-determine that application, as laid out in a letter from the Head of Transport Infrastructure Planning Unit on 2<sup>nd</sup> August<sup>109</sup>.

4.4.11 For the purposes of his re-determination of the application the Secretary of State invited further representations from NH and Interested Parties on:

*‘the carbon impact of the development; the implications, if any, of the development in relation to the Paris Agreement and the UK’s nationally-determined contribution under the Paris Agreement, the 2050 net zero target in the Climate Change Act 2008, and carbon budgets set under the 2008 Act (including the sixth carbon budget as set out in the Carbon Budget Order 2021); and, whether the increase in carbon emissions resulting from the development is so significant that it would have a material impact on the ability of the Government to meet its carbon reduction targets;*

*the direct, indirect and cumulative likely significant effects of the development on climate, including greenhouse gas emissions and climate change adaptation, in light of the requirements set out in the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (‘the EIA Regulations’) and in light of paragraphs 5.17 and 5.18 of the National Policy Statement for National Networks (‘NNNPS’).’*

4.4.12 On January 7<sup>th</sup> 2022 the Secretary of State<sup>110</sup> requested additional information from NH on the cumulative assessment of ‘GHG emissions from the scheme with other existing and/or approved projects on a local, regional and national level on a consistent geographical scale (for example an assessment of the cumulative effects of the Road Investment Strategy (‘RIS’) 1 and RIS 2 at a national level). This should: take account of both construction and operational effects; identify the baseline used at each local, regional and national level; and identify any relevant local, regional or national targets and/or budgets where they exist (including the carbon budgets, the 2050 net zero target under the Climate Change Act 2008,

<sup>107</sup> The carbon impact of the national roads programme, Transport for Quality of Life, July 2020

<sup>108</sup>

<sup>109</sup>

<sup>110</sup>

*and the UK's Nationally Determined Contribution under the Paris Agreement). It should be accompanied by reasoning to explain the methodology adopted, any likely significant effects identified, any difficulties encountered in compiling the information, and how the assessment complies with the Environmental Impact Assessment Regulations'.*

4.4.13 The Secretary of State's questions with respect to the A38 Derby junctions, allow for exploration of the scheme's implications for the Paris Agreement, the UK's Nationally Determined Contribution, achievement of 2050 Net Zero and carbon budgets at a national regional and local level, and for its cumulative effects. The responses of the Interested Parties<sup>111</sup> make compelling arguments on which we have drawn to make our case.

### **NPSNN does not reflect the urgency of the Climate Emergency**

4.4.14 The Government intends to review NPSNN 2014 under section 6 of the Planning Act 2008<sup>112</sup> but has decided not to suspend the NPSNN whilst the review is ongoing. Therefore NPSNN remains government policy.

4.4.15 Since the NPSNN was published in 2014 the following events demonstrate how out of sync it is with recognising and addressing the climate emergency. The events also reflect the urgency with which we need to address climate change.

- *2015 Paris Agreement<sup>113</sup> signed* – It aims to maintain the increase in global average temperature at 'well below' 2°C and 'pursue efforts' to limit the temperature increase even further to 1.5°C. *'In order to achieve the long-term temperature goal set out in Article 2, Parties aim to reach global peaking of greenhouse gas emissions as soon as possible, recognizing that peaking will take longer for developing country Parties, and to undertake rapid reductions thereafter in accordance with best available science, so as to achieve a balance between anthropogenic emissions by sources and removals by sinks of greenhouse gases in the second half of this century, on the basis of equity, and in the context of sustainable development and efforts to eradicate poverty (Article 4, Paris Agreement).*
- *Dec 2020 UK's Nationally Determined Contribution (NDC)* - commits the UK to reducing economy-wide GHG by at least 68% from the 1990 baseline by 2030<sup>114</sup> under the Paris Agreement.
- *2019 - a climate emergency declared by the UK Parliament<sup>115</sup> and many local and combined authorities<sup>116</sup>;*
- *2019 - Climate Change Act 2008 amended.* The Act originally committed the UK to cut its emissions by at least 80% below the 1990 baseline level by 2050<sup>117</sup>. On 27 June 2019,

<sup>111</sup> [REDACTED]

<sup>112</sup> Decarbonising Transport, DfT, 2021; Written Ministerial Statement by the Secretary of State for Transport on 22 July 2021

<sup>114</sup> UK of GB and NI's Nationally Determined Contribution, UK Government, 2020

4th Dec 2020

<sup>116</sup> E.g. *Places for Everyone*, the Joint Development Plan for 9 of the 10 districts of Greater Manchester Aug 2021, para 1.52

<sup>117</sup> UK Climate Change Act (2008)

this target was amended, committing the UK to a legally-binding target of net zero emissions by 2050, set on a whole-economy basis;

- 2019 - *local authorities expedite net zero carbon targets for earlier than 2050*; Greater Manchester Combined Authority by 2038; South Yorkshire Mayoral Combined Authority by 2040; Barnsley MBC Net Zero 2045<sup>118</sup>; and Sheffield City Council and High Peak Borough Council by 2030. Derbyshire County Council has aligned its emissions reduction pathway to the UK's NDC target<sup>119</sup>. HPBC is aiming for the borough to be carbon neutral by 2030<sup>120</sup>.
- 2021 *Transport for the North's statutory Decarbonisation Plan* has a target of Net Zero by 2045, reflecting local and combined authority consensus across the North.
- 2021 *IPCC<sup>121</sup> Sixth Report* demonstrated accelerating widespread climate change. All five scenarios indicate temperature increases would hit 1.5°C-1.6°C around 2030. Even 1.5°C of warming would have brutal consequences, such as food and water shortages in some parts of the world. Warming to reach 2°C would create risks that any reasonable person would regard as deeply dangerous. A path that would prevent a rise of much more than 1.5°C would require annual emissions to fall by about 50% between now and 2030, and reach net zero by 2050.
- 2021 *October UK's Net Zero Strategy Build Back Greener* reflects the climate emergency. 'Science is clear that the world is warming, that this is occurring because of human activity, and that left unchecked, continued warming would be deeply harmful, not just to the natural world, but also to human security and wellbeing' (p.362). 'Rapid and deep cuts to emissions are essential to avoid the most dangerous impacts of climate change' (p. 363)

## THE CARBON ASSESSMENT

4.4.16 The NPSNN 5.17 requires '*road projects applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets*'.

4.4.17 The EIA Regs<sup>122</sup> and guidance<sup>123</sup> require an assessment of the current environmental baseline; the effects of the scheme itself across various functions – construction, operation, maintenance; and finally the effect of the scheme in combination with other schemes<sup>124</sup>.

4.4.18 National Highways' Licence<sup>125</sup> requires it to *consider the cumulative environmental impact of its activities across its network; develop approaches to the construction, maintenance and operation of the Licence holder's network that are consistent with the*

<sup>118</sup> [REDACTED]; SCRCA Board meeting 27 Jan 2020 Item 12 [REDACTED] Derbyshire

Environment and climate change framework [REDACTED]

Derbyshire Local Transport Plan 2011-2026 [REDACTED]

<sup>119</sup> [REDACTED] Figure 12 [REDACTED]

<sup>120</sup> [REDACTED]  
<sup>121</sup> Climate Change 2021: The Physical Science Basis

<sup>122</sup> The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, [REDACTED]

<sup>123</sup> [REDACTED] PDF page 7

<sup>124</sup> [REDACTED]; [REDACTED]

<sup>125</sup> Highways England's Licence 5.23

*government's plans for a low carbon future; and influence road users to reduce the greenhouse gas emissions from their journey choices.*

4.4.19 There is no current environmental baseline for us to understand the carbon emissions at the present time. This is a crucial omission to understanding the full nature of the scheme's impacts.

#### **Effects of scheme's carbon emissions on UK carbon budgets and international obligations**

4.4.20 NH has used the difference between the 'do minimum' and 'do something' emissions in the study area to test the effect of the scheme on the ability of the UK to meet its carbon budgets and therefore meet the 2050 Net Zero target. It estimates the scheme would contribute 0.0028% of the 4<sup>th</sup> carbon budget, 0.0017% of the 5<sup>th</sup> carbon budget and 0.0033% of the 6<sup>th</sup> carbon budget<sup>126</sup>; and concludes that the '*magnitude of emissions from the Scheme will not materially impact the Government's ability to meet the budget, and therefore will not have a significant effect on climate*' (requirement of NPSNN 5.17). The UK's carbon budgets have not been set beyond 2038 therefore it is not possible to test this effect. Beyond 2038 the scheme must be tested against the Net Zero 2050 target itself.

4.4.21 We disagree with NH's claim. The UK is not on track to meet the 4<sup>th</sup> (2023-2027), 5<sup>th</sup> (2028-2032) or the 6<sup>th</sup> (2033-2037) carbon budgets<sup>127</sup>. The UK's 6<sup>th</sup> budget<sup>128</sup> requires a step-change in carbon emissions reductions (78% reduction by 2035, compared to 1990 levels; contrasted with 51% for the 4<sup>th</sup> budget and 57% for the 5<sup>th</sup> budget) in order to address this projected failure to meet the 4<sup>th</sup> and 5<sup>th</sup> budget. Furthermore the UK 4<sup>th</sup> and 5<sup>th</sup> carbon budgets have not been revised in line with Net Zero. Consequently the scheme's impact has to be seen in the context of a need for tighter controls of emissions now. The scheme's year-on-year increasing emissions, when absolute reductions are required, could materially impact on the ability to meet the UK carbon budgets and have a significant effect on climate.

4.4.22 NPSNN also requires scheme emissions must not lead to the UK being in breach of its international obligations.

#### *UK International Obligations*

4.4.23 Section 104(4) of the Planning Act 2008 refers to a need to consider whether the proposed development would lead to the UK being in breach of any of its international obligations. These obligations include the Paris Agreement 2015 and hence the UK's NDC of 68% reduction in GHG from 1990 baseline by 2030. The NDC is not covered by any carbon budget as it falls midway through the 5<sup>th</sup> carbon budget which is not Net Zero compliant. Achieving the NDC can be assessed at (a) the UK level and (b) the local level using the Tyndall centre SCATTER budgets.

<sup>126</sup> ES Ch. 14, Table 14.2 – revised; ES Ch. 14, 14.9.8, Table 14.16 revised

<sup>127</sup> Sixth Carbon Budget, Climate Change Committee, Dec 2020

Reducing UK Emissions Progress Report to Parliament, Committee on Climate Change, June 2020

<sup>128</sup> Sixth Carbon Budget charts and data in the report Advice Report Ch1&2 tab, row 238.

(a) UK's NDC - Transport emissions in 2019 were 4.6% lower than in 1990<sup>129</sup>. Therefore from 2020 a 63.4% decrease in transport carbon emissions is required. Using *pro rata* annual decrements in the 2025 'do minimum' (without the scheme) modelled carbon emissions we estimate the 2020 emissions would be 723,156tCO<sub>2</sub>. A 63.4% by 2030 would require a reduction in emissions of **458,481tCO<sub>2</sub>**. Instead with the scheme they **increase to 756,232tCO<sub>2</sub>**. NH states that the effect of EVs is included up to 2030<sup>130</sup>, therefore this appears to be an outcome based on the Government's main policy lever.

(b) Carbon budgets for UK local authority areas have been developed by scientists at Manchester Tyndall centre to show what a 'fair' contribution towards the Paris Climate Change Agreement would be required by each one. The Tyndall Centre has taken IPCC global budgets and produced SCATTER (Setting City Area Targets and Trajectories for Emissions Reduction) budgets for UK local authorities<sup>131</sup>. These translate the 'well below 2°C and pursuing 1.5°C' global temperature target and equity principles in the United Nations Paris Agreement to a national UK carbon budget. The UK budget is then split between sub-national areas using different allocation regimes. Local Authorities can then set carbon emissions targets that are consistent with United Nations Paris Climate Agreement. These emissions budgets are substantially smaller than those adopted by successive UK Governments, in order to keep temperatures well below 2°C, to reflect the strong equity steer from the Paris Agreement and to give a greater proportional allocation to the poorer parts of the world. Therefore using the SCATTER budgets to represent the requirements of the Paris Agreement 2015 at a local level appears legitimate and relevant.

4.4.24 Using local authority SCATTER budgets as the framework for assessment is not easy due to lack of definition of the study area for analysing carbon emissions. As the Area of Detailed Modelling appears to be the study area for operational climate effects we have used its boundary to determine which SCATTER budgets to include. At its periphery the ADM includes small parts of a number of local authority areas, but its core appears to consist of large parts of Tameside, half of Kirklees, High Peak Borough and Stockport. The inclusion of the whole of Kirklees more than compensates for excluded areas in South Yorkshire. Both GMCA (including Tameside and Stockport) and West Yorkshire Combined Authority (Kirklees) have a Net Zero target of 2038. HPBC is aiming for the whole borough to be carbon neutral by 2030<sup>132</sup>.

4.4.25 The local authority area total carbon budgets for the period 2023-2027 are Tameside 1.8MtCO<sub>2</sub>e; High Peak 3.7MtCO<sub>2</sub>e; Stockport 2.5MtCO<sub>2</sub>e; Kirklees 3.9MtCO<sub>2</sub>e. This gives a total of 11.9MtCO<sub>2</sub>e. To this period the scheme's operational emissions would contribute 16,286tCO<sub>2</sub>e or 0.14% of total budgeted emissions. Using the proportion (21%) allotted to the transport sector in the UK 4<sup>th</sup> carbon budget the scheme would use up 0.65% of the local authority transport budget. For the period 2028-2032 operational emissions of 29,235tCO<sub>2</sub>e from the scheme would consume 0.5% of the area's total carbon budget of 5.7MtCO<sub>2</sub>e. Using the proportion (18%) allotted to the transport sector in the UK 5<sup>th</sup> carbon

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Referring to

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budget the scheme would use up 3% of the local authority transport budget. This one road scheme makes substantial inroads on extremely limited budgets.

4.4.26 NH has provided no evidence one way or the other of the effect of the scheme's carbon emissions on the ability of the UK to meet its carbon budgets or to achieve the Net Zero carbon target by 2050. It has merely done a calculation to show the scheme's emissions as a percentage of the carbon budgets. Unlike NH's, our calculations above are placed in a logical context. They show that achieving the UK's NDC at the national level or within local authority SCATTER budgets would be significantly challenged by the scheme's carbon emissions.

4.4.27 All these examples show that radical reductions are required to achieve the target for 2030 if temperatures have a chance of staying below 2°C increase. The A57 Link Roads would take the emissions in the wrong direction, destabilising UK carbon budgets and making it increasingly difficult to achieve the UK NDC and Net Zero 2050.

#### **Failure to Assess the Impact of Scheme Emissions on Subnational, Regional and Local Greenhouse Gas Targets**

4.4.28 NPSNN 4.4 requires *'environmental, safety, social and economic benefits and adverse impacts, should be considered at national, regional and local levels'*. The EIA guidance requires *'The assessment should take relevant greenhouse gas reduction targets at the national, regional, and local levels into account, where available'<sup>133</sup>*. The Secretary of State's questions with respect to the A38 Derby junctions<sup>134</sup>, also focus on the scheme's implications for achievement of carbon budgets at a national, regional and local level. Carbon budgets and targets are available at the national (the Government's Net Zero Strategy Build Back Greener, October 2021); pan-northern (Transport for the North), regional (GMCA) and local (TMBC; HPBC) levels.

4.4.29 Sub-national, combined and local authorities are seen by Government as an integral part of the national effort to meet climate targets. *'Radical change will come from empowering and supporting local leaders, harnessing the strengths and expertise of local authorities, mayoral combined authorities, Sub-National Transport Bodies, the devolved administrations and local interest groups, all of whom have a crucial part to play'<sup>135</sup>* ... *'We will drive decarbonisation and transport improvements at a local level by making quantifiable carbon reductions a fundamental part of local transport planning and funding.'* The Net Zero Strategy makes *'quantifiable carbon reductions a fundamental part of local transport planning and funding. Local Transport Plans (LTPs) ...*

4.4.30 NH has ignored both the important role of regional and local authorities in achieving decarbonisation of transport, and *'how local areas will deliver ambitious carbon reductions in line with carbon budgets and net zero'<sup>136</sup>*. It has therefore failed to fulfil NPSNN and the requirements of the EIA. The impact on all of the following should have been assessed.

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<sup>133</sup> Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report – European Union, 2017 [redacted] page 41

<sup>134</sup> [redacted]

<sup>135</sup> Decarbonising Transport, A better Greener Britain, DfT, 2021, pages 40 and 151

<sup>136</sup> [redacted]

*(i) Transport for the North's Decarbonisation Strategy approved 24 Nov 2021<sup>137</sup>*

4.4.31 The strategy and its emissions reduction pathway to Net Zero 2045 is based on robust evidence from four modelled future travel scenarios, presents a credible quantified trajectory to 2045, emphasises the cumulative effects of carbon emissions, demonstrates the profound policy gap necessary to meet that target, and aims to monitor compliance. It covers the scheme's study area that lies within South Yorkshire and Great Manchester. It should therefore carry significant material weight in the Examination. TfN's trajectory reduces transport emissions by 55% between 2018 and 2030, or from 26MtCO<sub>2</sub> to 12MtCO<sub>2</sub>, and by 99% by 2040 to 1MtCO<sub>2</sub><sup>138</sup>. The carbon emissions attributed to the scheme in 2040 by NH are 6,893tCO<sub>2</sub> which represents 0.7% of TfN's 2040 emissions target.

*(ii) GMCA<sup>139</sup>*

4.4.32 The carbon budget proposed by the Tyndall Centre for Greater Manchester and the potential pathways to achieve carbon neutrality by 2038<sup>140</sup> require cumulative CO<sub>2</sub>e to be kept under 71MtCO<sub>2</sub> (range of 45-104 MtCO<sub>2</sub>) with an annual average reduction of 15% in emissions (range of 10-20%). In order to achieve this, Greater Manchester would need to reduce passenger distance travelled (km) by 25% by 2035. (South Yorkshire Mayoral Combined Authority's Climate Emergency Framework<sup>141</sup> has similar goals of a 25% reduction in total travel demand by 2030, and a 25% reduction in car miles by 2040). However, rather than seeking to reduce distance travelled, the Scheme<sup>142</sup> would increase vehicle kilometres (NH does not quantify this). Even with a shift to electric vehicles, a reduction of between 20% and 50% in car mileage is needed to meet the UK carbon budget by 2030<sup>143</sup>. By increasing vehicle kilometres the scheme is taking carbon emissions in the wrong direction and compromising GMCA's annual emissions reduction.

*(iii) Tameside MBC*

4.4.33 If carbon emissions attributed to the scheme were accounted for in Tameside's total carbon budget they would use up an increasingly significant proportion of the budget. The scheme's emissions during carbon budget period 2023-2027 (16,286tCO<sub>2</sub>) would consume 0.9% of the total budget. Assuming annual average emissions are ~6,000tCO<sub>2</sub>e, the emissions during 2028-2032 would consume 3.3% of emissions, and those during 2033-2037 would consume 7.5% of their respective 5-year carbon budgets. In terms of the transport sector budget for Tameside based on the proportion in the UK carbon budgets, the scheme would take nearly half the budget between 2033-2037 (see Table below).

<sup>137</sup> [h](#)

<sup>138</sup> Fig 2 TfN's Decarbonisation Trajectory, TfN Decarbonisation Strategy, draft for consultation 2021

<sup>139</sup> Places for Everyone, the Joint Development Plan for 9 of the 10 districts of Greater Manchester Aug 2021, para 3.3

<sup>140</sup> Places for Everyone, Carbon and Energy Topic Paper Figures 5 and 6, and paras 3.24-3.27; 5.5

<https://www.manchesterclimate.com/sites/default/files/2021/08/Manchester-Carbon-Budget-2023-2037.pdf>  
Quantifying the implications of the Paris Agreement for the city of Manchester

<sup>141</sup> SCRCA Board meeting 27 Jan 2020 Item 12

<sup>142</sup> ES Ch. 14, 14.9.7

<sup>143</sup>



Carbon Budgets in MtCO2 for 2018-2047 for Tameside <sup>144</sup>				
Carbon Budget Period	Recommended Carbon Budget	% for transport as per UK Carbon Budgets	TMBC budget for transport	Scheme take of TMBC transport budget
2018 - 2022	3.5			
2023 - 2027	1.8	21%	0.378	4%
2028 - 2032	0.9	18%	0.165	19%
2033 - 2037	0.4	17%	0.068	44%
2038 - 2042	0.2			
2043 - 2047	0.1			

4.4.34 Assessment against national, subnational, regional and local targets indicate NH's scheme would make it increasingly harder for authorities to reduce carbon emissions and achieve their carbon targets.

#### **Scheme's emissions are significant**

4.4.35 NPSNN 5.18 *'Any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so **significant** that it would have a **material impact** on the ability of Government to meet its carbon reduction targets'* (our emphasis).

4.4.36 Up to 2032 the scheme alone would contribute 0.65%, rising to 3%, to transport carbon budgets of those authorities within the ADM. At the more local level in Tameside, where the majority of the emissions would be generated, the scheme would contribute 4%, rising to 19%, of the transport carbon budget. These are substantial and significant proportions which would have a material impact on the achievement of local carbon budgets, and therefore ultimately and cumulatively on UK carbon budgets. This challenges NH's assessment against the UK carbon budgets and shows clearly that the scheme's impact cannot be dismissed as unacceptable.

#### **MEASURES THAT NPSNN USES TO CLAIM EXEMPTION FOR THE SRN**

4.4.37 NPSNN states *'The impact of road development on aggregate levels of emissions is likely to be very small. Impacts of road development need to be seen against significant projected reductions in carbon emissions and improvements in air quality as a result of current and future policies to meet the Government's legally binding carbon budgets and the European Union's air quality limit values. For example:*

*Carbon – the annual CO2 impacts from delivering a programme of investment on the Strategic Road Network of the scale envisaged in Investing in Britain's Future amount to well below 0.1% of average annual carbon emissions allowed in the fourth carbon budget<sup>145</sup>. This would be outweighed by additional support for ULEVs also identified as overall policy. (NPSNN Paragraph 3.8)*

*'Carbon budgets and plans will include policies to reduce transport emissions, taking into account the impact of the Government's overall programme of new infrastructure as part of that.'* (NPSNN Paragraph 5.16)

<sup>144</sup> [REDACTED]

<sup>145</sup> This is based on a roads programme of the scale envisaged in Investing in Britain's Future, over a 10 to 15 year period.

*'The Government has an overarching national carbon reduction strategy (as set out in the Carbon Plan 2011) which is a credible plan for meeting carbon budgets. It includes a range of non-planning policies which will, subject to the occurrence of the very unlikely event described above, ensure that any carbon increases from road development do not compromise its overall carbon reduction commitments. The Government is legally required to meet this plan.'* (NPSNN Paragraph 5.18)

4.4.38 We have shown above that the projected reduction in UK domestic transport emissions has not occurred. Transport is taking up an increasing proportion of the carbon budget. In 2019 the domestic transport sector emissions were almost the same as in 1990. In 1990 they constituted 16% of total GHG emissions; in 2019, 27%<sup>146</sup>. This trend is repeated locally. In Tameside transport emissions have increased their proportion of total emissions, from 23.5% in 2005 to 35.3%<sup>147</sup> (see Table below). By increasing carbon emissions the scheme would contribute to both the local and national trend and impair achievement of carbon budgets and Net Zero.

	Tameside transport CO2 tonnes k	Tameside total CO2 tonnes k	% transport of total
2005	320.1	1,361.6	23.5%
2006	308.5	1,340.3	23.0%
2007	311.7	1,297.9	24.0%
2008	298.0	1,261.4	23.6%
2009	292.2	1,104.9	26.4%
2010	290.2	1,162.8	25.0%
2011	286.9	1,057.8	27.1%
2012	284.5	1,130.9	25.2%
2013	279.0	1,093.6	25.5%
2014	283.7	968.7	29.3%
2015	287.6	927.9	31.0%
2016	292.1	892.6	32.7%
2017	288.1	862.0	33.4%
2018	288.4	849.9	33.9%
2019	286.0	810.1	35.3%
<i>% reduced since 2005</i>	-10.7%	-40.5%	

4.4.39 NPSNN Paragraph 5.16 footnotes *The Carbon Plan – reducing greenhouse gas emissions* (December 2011) and successor documents. In this case the successor document would be the UK's Net Zero Strategy 2021<sup>148</sup>. The strategy states the fall in domestic transport emissions compared to 2019 levels could need to fall by around 34-45% by 2030

<sup>146</sup> [redacted] domestic surface emissions only ; UK Total Transport Emissions including IAS would be 165Mt or 33% share of GHG emissions.

<sup>147</sup> [redacted] full dataset tab, columns AC versus AK row 753

<sup>148</sup> [redacted]

and 65-76% by 2035 compared to 2019 levels. By contrast, during this time the scheme would increase carbon emissions annually by between 0.7% and 0.8%.

4.4.40 NNNPS 3.8 specifically refers to the role of ULEVs (ultra-low emission vehicles) in meeting UK carbon budgets. Although average emissions from new cars in Great Britain fell year on year between 2011 and 2016 – a total of 13% over this time, since 2016, average emissions for new cars began to rise year on year – a total increase of 6% between 2016 and 2019. The experience in Norway reinforces the policy failure of EVs to decarbonise transport. Whilst sales of EVs have escalated with appropriate incentives, carbon emissions have not fallen proportionately due to the ‘EVs’ being hybrid and running for much of their journey on fossil fuel<sup>149</sup>. Furthermore, it takes years to replace the existing cars on the road<sup>150</sup>. Up to 2030, the modelling of the scheme has taken account of EVs but on this evidence the scheme emissions are likely to even higher than forecast during this time, with adverse consequences for the UK carbon budgets.

### Conclusion

4.4.41 The scheme would increase carbon emissions annually in the study area by between 0.7 and 0.8% during a crucial period to 2030 when absolute rapid reductions are required. It would make significant and unsustainable inroads into subnational, regional and local carbon budgets, and impair their balance and achievement of Net Zero targets. It would impair compliance with the UK’s NDC. The evidence of the impact on regional and local budgets suggests that the impact of scheme emissions on UK carbon budgets is grossly underestimated. NPPF 2021 152 requires ‘**radical reductions in greenhouse gas emissions**’. No radical reductions, but the opposite, would result from the scheme. By increasing vehicle kilometres and car dependency the scheme undermines NPSNN 3.15. *The Government is committed to providing people with options to choose sustainable modes and making door-to-door journeys by sustainable means an attractive and convenient option. **This is essential to reducing carbon emissions from transport***<sup>151</sup> (our emphasis).

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<sup>149</sup> Transport Decarbonisation - A beginning not an end – presentation by Jill Anable 19 Aug 2021

<sup>150</sup>

<sup>151</sup> Transport Decarbonisation – A better greener Britain, 2021

## 4.5 EFFECTS ON AIR QUALITY

### Summary of CPRE assessment

4.5.1 The applicant concluded that during operation, there would be no significant adverse effect on human health due to the Scheme and there would be an improvement in air quality. The Scheme is not considered to be a risk to non-compliance with the Air Quality Directive (5.7.30) or the Air Quality Strategy (AQS) objectives.

4.5.2 We disagree. Due to redistribution of traffic air pollution would reduce for those living along Hyde Road, Mottram Moor and Woolley, but there are still exceedances of the Limit Value and the Air Quality Strategy (AQS) objective<sup>152</sup> elsewhere. Two AQMAs in the vicinity of the scheme and 2 AQMAs further east along the trunk road corridor have been omitted from the baseline study. This is presentational bias. The TPU Stage 3 Combined Modelling and Appraisal Report 7.3.1-7.3.3 revealed that *'an unmitigated TPU scheme could have significant AQ effects and jeopardise the application for development consent. Changes in traffic flow and speed as a result of the scheme were predicted to cause exceedances of the AQ strategy objectives for annual mean nitrogen dioxide (NO<sub>2</sub>)'*, in relation to these two AQMAs. The Scheme could jeopardise compliance with the AQS objectives and the Air Quality Directive.

### OMISSIONS FROM THE ASSESSMENT

4.5.3 The EIA regulations require<sup>153</sup> ***A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development*** (our emphasis). The Guidance<sup>154</sup> defines the baseline as *'a description of the current status of the environment in and around the area in which the Project will be located... The description of the current state of the environment must be sufficiently detailed and accurate to ensure that the effects, arising both during the development of the Project and in the future, can be adequately assessed'*.

4.5.4 NPSNN 5.3 requires that *The environmental statement should describe*

- *existing air quality levels;*
- *forecasts of air quality at the time of opening, assuming that the scheme is not built (the future baseline) and taking account of the impact of the scheme; and*
- *any significant air quality effects, their mitigation and any residual effects, distinguishing between the construction and operation stages and taking account of the impact of road traffic generated by the project.*

4.5.5 NPSNN 5.10 states *The Secretary of State should consider air quality impacts over the wider area likely to be affected, as well as in the near vicinity of the scheme.*

4.5.6 NPSNN 5.11 states -

- *'Air quality considerations are likely to be particularly relevant where schemes are proposed within or adjacent to AQMAs'; roads identified as being above Limit Values or*

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<sup>152</sup> **Legally binding, mandatory limit values** originally set by the European Union (EU) Directive 2008/50/EC on ambient air quality and cleaner air for Europe; and **regulations implementing national air quality objectives as set out in the Air Quality Strategy** for England, Scotland, Wales and Northern Ireland (AQS) which local authorities are required to work towards achieving.

<sup>153</sup> [REDACTED] 5 (2)

<sup>154</sup> [REDACTED] page 33

*nature conservation sites (including Natura 2000 sites and SSSIs, including those outside England); and*

- *where changes are sufficient to bring about the need for a new AQMA or change the size of an existing AQMA; or bring about changes to exceedances of the Limit Values, or where they may have the potential to impact on nature conservation sites’.*

4.5.7 In that context there are four omissions (a) AQMAs; (b) GM Clean Air Zone (CAZ); (c) measurement of PM; (d) recognition of regional and local reduction targets; (e) effects on air quality in 2040.

#### **(a) Omission of AQMAs**

4.5.8 There are three designated AQMAs for exceedances of NO<sub>2</sub> within the vicinity of the project – Greater Manchester AQMA which covers the M60, M67, A57T/A628T to the TMBC-DCC boundary (Millbrook, Hollingworth); Dinting Vale AQMA in Glossop; and Tintwistle AQMA. There are two AQMAs along the A616T in South Yorkshire.

4.5.9 The local study area is shown in Figure 5.1 and was based on all roads meeting the traffic screening criteria and adjoining roads within 200 m<sup>155</sup>. It includes GM AQMA and the northern half of the Dinting Vale AQMA. The Tintwistle AQMA is excluded, as are those of Sheffield and Barnsley<sup>156</sup>.

4.5.10 The exclusion of all these AQMAs from the baseline study does not fulfil the criteria of DMRB 105, 2.15. Sheffield City-wide AQMA<sup>157</sup> covers the entire eastern half of the city, the majority of the urban western half of the city and the M1<sup>158</sup>. The A616T forms part of its northern boundary. It was designated in 2010 for PM<sub>10</sub> - 24-Hour Mean and for Nitrogen dioxide NO<sub>2</sub> - 1-hour and Annual Mean. Langsett AQMA alongside the A616T in Barnsley Metropolitan Borough<sup>159</sup> was declared in 2012 for exceedances of NO<sub>2</sub>. Recent monitoring in Langsett revealed some very high NO<sub>2</sub> concentrations which are likely to be linked to very highly polluting vehicles travelling on the network.

4.5.11 The omissions of the Tintwistle and Dinting Vale AQMAs are drawn into stark emphasis by the Stage 3 Combined Modelling and Appraisal Report on the need for modelling refinement specifically to address air pollution in both the Tintwistle and Dinting Vale AQMA. This pollution was of such significance that it would *‘jeopardise the application for development consent’*<sup>160</sup>. We cannot know the significance of the refinement as we have incomplete results for the AQMAs.

4.5.12 The scoping opinion given by the Planning Inspectorate in 2017<sup>161</sup> and relied upon by NH for the 2020 iteration of the scheme *‘considers that the ES should include an assessment*

<sup>155</sup> DMRB LA 105 (paragraph 2.1-2.8)

<sup>156</sup> [REDACTED] 2020 Air Quality Annual Status Report (ASR) In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management June, 2020

<sup>157</sup> [REDACTED]

<sup>158</sup> [REDACTED] AQMA declared by Sheffield CC in 2010 M1 J34 around 40ug3

[REDACTED] 2018 Air Quality Annual Status Report (ASR) In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management June, 2018

<sup>159</sup> [REDACTED] AQMA 6

<sup>160</sup> Stage 3 Combined Modelling and Appraisal Report 7.3.31-7.3.33; 8.5.2; Figures 8-4 & 8-6

<sup>161</sup> Scoping Opinion Proposed TPUP TRO10034 Dec 2017 4.1 (3)

*of impacts associated with all relevant pollutants under the EU ambient air quality directive including increases in PM2.5 resulting from the Proposed Development where relevant. The Applicant's attention is drawn to Public Health England's comments in this respect. In determining significance, the assessment should take into account performance against relevant target/limit values'.*

#### **(b) Omission of Greater Manchester Clear Air Zone (GM CAZ)**

4.5.13 The Secretary of State for Defra has instructed all the local authorities in Greater Manchester<sup>162</sup>, along with many other UK local authorities, to take quick action to reduce NO2 levels below the legal limit of 40 µg/m<sup>3</sup>. The direction under the Environment Act 1995 requires GMCA to undertake feasibility studies to identify measures for reducing NO2 concentrations to within legal limit values in the '*shortest possible time*'.

*'The authorities must ensure that the local plan for NO2 compliance is implemented so that—*

*(a) compliance with the legal limit value for nitrogen dioxide is achieved in the shortest possible time, and by 2024 at the latest;*

*(b) exposure to levels above the legal limit for nitrogen dioxide are reduced as quickly as possible'.*

4.5.14 In order to meet these requirements all 10 local authorities in Greater Manchester have prepared a Clean Air Plan (CAZ)<sup>163</sup>. The CAZ is to be implemented in May 2022 and end in 2026. Its boundary is the whole of the Greater Manchester area; it applies only to local roads and excludes the SRN. However, an exception has been agreed with Government ministers for inclusion of the A57T/A628T from M67 Junction 4 to TMBC-DCC boundary (Millbrook, Hollingworth)<sup>164</sup>; although the A57T/A628T may not be included at the start of CAZ charging. The charge would not apply to private cars, only to non-compliant lorries, buses, taxis, minibuses. The applicant has excluded the CAZ from the traffic and air quality modelling (ES Ch. 5, 5.3.53-54), claiming its results represent the worst case scenario. We disagree. The effects of the Zone are likely to be complex, but could lead to diversions over a wide area to avoid paying the toll and reach the SRN within Greater Manchester by other routes, creating traffic congestion and air pollution elsewhere. For example to reach the M60 or the M6 and avoid the toll, drivers could use the motorway M1/M62 from Sheffield leading to potential effects on AQMA along the M1<sup>165</sup>.

- 
- Road alignment will change by 5 m or more; or
  - Daily traffic flows (two way) will change by 1,000 annual average daily traffic (AADT) or more; or
  - Heavy Duty Vehicle (HDV) flows (two way) will change by 200 AADT or more; or
  - A change in speed band.

<sup>162</sup> [REDACTED]

<sup>163</sup> Clean Air Plan July 2021

<sup>164</sup> Clean Air Plan update July 2021 para 3.4

<sup>165</sup> AQMA 1 alongside M1 declared by BMBC in 2001, meets the AQS. [REDACTED]

[REDACTED] 2020 Air Quality Annual Status Report (ASR) In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management June, 2020. AQMA declared by Sheffield CC in 2010 M1 J34 around 40ug3

[REDACTED] 2018 Air Quality Annual Status Report (ASR) In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management June, 2018

### **c) Omission of measurement of particulate matter (PM)**

4.5.15 As there were no exceedances of the PM10 in the base year (2018), assessment of PM10 was not undertaken (5.3.37)<sup>166</sup>.

4.5.16 Assessment of PM2.5 was excluded from the study<sup>167</sup> as the UK meets the limits it has set, PM10 levels are used as a proxy for it and there have been no exceedances in Greater Manchester [5.3.17]<sup>168</sup>. The highest annual mean PM2.5 concentration measured in Greater Manchester in 2018 was 12 µg/m<sup>3</sup>, less than half the annual mean threshold. NH concluded there is no risk of PM2.5 exceedances with or without the Scheme.

4.5.17 Within Greater Manchester, transport is the major source of air pollution with roads accounting for 65% of nitrogen oxides (NOx), 79% of larger particulates (PM10) and 31% of carbon dioxide emissions across the city region. Within Tameside exposure to fine particulates at current levels is estimated to contribute to around 1,200 deaths per annum. Greater Manchester has signed up to achieve WHO 'BreatheLife City' status by 2030<sup>169</sup>, which means achieving WHO targets for PM and other air pollutants by this date<sup>170</sup>. The WHO guidelines updated in 2021 state that annual average concentrations of PM2.5 should not exceed 5 µg/m<sup>3</sup>, while 24-hour average exposures should not exceed 15 µg/m<sup>3</sup> more than 3 - 4 days per year; PM10 should not exceed 15 µg/m<sup>3</sup> annual mean, 45 µg/m<sup>3</sup> 24-hour mean<sup>171</sup>. In Tameside the PM10 monitoring results show the levels in years 2015 to 2019 were between 17 and 19µg/m<sup>3</sup> annual mean, and well above the 2021 WHO standard<sup>172</sup>. NH's estimated annual mean PM10 concentrations for 2018 showed that 3% of receptors would experience levels in excess of the WHO standard and 13% of receptors would experience levels approaching that limit (14 µg/m<sup>3</sup> annual mean and over)<sup>173</sup>.

4.5.18 By 2040 the sales of all new none-zero emission vehicles will be phased out<sup>174</sup>. There is uncertainty at present as to the effect this will have on air pollution. Non-exhaust emissions already account for over 90% of PM10 and 85% of PM2.5 emissions from traffic. Electric vehicles (EVs) are 24% heavier than equivalent internal combustion engine vehicles (ICEVs)<sup>175</sup>. As a result, total PM10 emissions from EVs were found to be equal to those of modern ICEVs. PM2.5 emissions were only 1-3% lower for EVs compared to modern ICEVs. Others have found the potential of battery EVs to reduce emissions has been underestimated<sup>176</sup>.

4.5.19 Current policy has not yet caught up with these potential effects which require setting standards for non-exhaust emissions and encouraging weight reduction of all vehicles to significantly reduce PM emissions from traffic. In the interim we should adopt a

<sup>166</sup> DMRB LA 105 (paragraphs 2.21.2 and 2.21.3), requires that only where PM10 concentrations exceed air quality thresholds in the base year (2018) should PM10 be included in the opening year (2025) assessment.

<sup>167</sup> ES Air Quality 5.3.18; DMRB LA 105 (paragraph 2.21.4)

<sup>168</sup> Greater Manchester Combined Authority, 2019 Annual Status Report, June 2020. Retrieved 2020 from

<sup>170</sup> *Places for Everyone*, the Joint Development Plan for 9 of the 10 districts of Greater Manchester Aug 2021, para 5.44-5.45

<sup>171</sup>

<sup>172</sup> ES Ch.5 Air Quality Table 5-8: Annual Mean PM10 Concentrations at Tameside CMS

<sup>173</sup> ES Appendix 5.5. Air Quality Model Table A-4 deadline 1 version

<sup>174</sup> Decarbonising Transport – A better greener Britain, DfT, July 2021, page 94; Net Zero Technical Report, Climate Change Committee, May 2019

<sup>175</sup>

<sup>176</sup> The Underestimated Potential of Battery EVs to reduce emissions, Auke Hoekstra, Joule3, 1404–1414, June 19, 2019

precautionary approach. The applicant's approach would increase vehicle-miles travelled, and therefore pollution by PM, in an urban area where the social cost of non-exhaust emissions are high. Public Health England requested PM2.5 levels but was refused<sup>177</sup>. As it is, we have no way of knowing what the effect of the scheme would be on particulate matter.

#### **d) No recognition of local and regional reduction targets**

4.5.20 The EIA guidance requires '*The assessment should take relevant greenhouse gas reduction targets at the national, regional, and local levels into account, where available*<sup>178</sup>.' NO<sub>2</sub> is considered a GHG. NH's assessment should reflect the GMCA Clean Air Plan but did not and is therefore in breach of the regulations. In 2016 the 10 GM authorities declared a single AQMA, based on a precautionary level of 35µg/m<sup>3</sup> NO<sub>2</sub> rather than the legal limit of 40µg/m<sup>3</sup><sup>179</sup>. GM is committed to achieving WHO Standards for both NO<sub>2</sub> and PM by 2030<sup>180</sup>. In 2021 the WHO set new lower standards for NO<sub>2</sub> that should not exceed 10µg/m<sup>3</sup> annual average and 25 µg/m<sup>3</sup> 24-hour mean<sup>181</sup>. The failure to achieve AQS objectives has led GMCA to propose a Clean Air Zone (see above). Of all the 621 modelled receptors<sup>182</sup>, 7% would exceed 35µg/m<sup>3</sup> with the scheme in 2025; all would be above 10µg/m<sup>3</sup>.

#### **e) Effects on air quality in 2040 have been omitted**

4.5.21 Air quality has only been assessed in 2025, despite traffic increasing in 2040. The EIA requires the description of the likely significant effects on the factors specified in regulation 5(2) – in this case air - to cover the direct effects and any indirect, secondary, cumulative, transboundary, **short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development** (our emphasis).

### **EFFECTS OF THE SCHEME**

4.5.22 Local air quality monitoring data indicates that there are currently exceedances of the annual mean AQS objective for NO<sub>2</sub> in Denton, Hyde, Mottram, Woolley Bridge, Hollingworth and Dinting Vale<sup>183</sup>. There are also exceedances of the hourly mean AQS objective for NO<sub>2</sub> adjacent to the A57T in Mottram. There would be no new exceedances with the scheme and for the majority (68%) of receptors modelled (621) there would be little change in air quality.

4.5.23 In 2018 the base year 158 of the 621 modelled receptors had exceedances of the annual mean NO<sub>2</sub> [Appendix 5.5 Table A-3]. In 2025 without the scheme half of these receptors (76) would no longer experience exceedances. This reduction accords with the trend in reducing air pollution<sup>184</sup> shown by recordings from local monitoring sites in Tameside between 2015 and 2019<sup>185</sup>.

<sup>177</sup> 5.1 Consultation Report - Table 5-9: Summary of Responses Received from Prescribed Consultees (s42(1)(a)) page 90; Table 8.34 Summary of Responses Received from Prescribed and Non-Statutory Consultees (s42(1)(a)) page 218.

<sup>178</sup> Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report – European Union, 2017 [REDACTED] page 41

<sup>179</sup> *Places for Everyone*, the Joint Development Plan for 9 of the 10 districts of Greater Manchester Aug 2021, para 10.13

<sup>180</sup> [REDACTED]

<sup>181</sup> [REDACTED]

<sup>182</sup> Appendix 5.5 Table A-3

<sup>183</sup> In 2019 [REDACTED] Table A-2] tube monitoring in 42 locations within the study area gave mean measurements that exceeded NO<sub>2</sub> limit in 14 places; by comparison only 8 locations exceeded the annual mean limit in 2018. Defra's modelling showed no exceedances of annual mean NO<sub>2</sub> in 2018 [REDACTED] Table A-1].

<sup>184</sup> Since 1990, overall NO<sub>x</sub> emissions have decreased by 72%. [REDACTED]

<sup>185</sup> ES Ch. 5 Air Quality Table 5-7: Annual Mean NO<sub>2</sub> Concentrations at Tameside Monitoring Sites



4.5.24 In 2025 with the scheme, of those 76 receptors which would still have exceedances without the scheme, 75 would have a decrease in concentration (improvement), with 60 no longer exceeding the legal limit or the annual mean AQS objective<sup>186</sup>. These 60 receptors are located adjacent to the A57T in Mottram, at the Gun Inn Junction, and adjacent to the A628T east of the Gun Inn Junction. The decreases in concentrations are primarily due to substantial reductions in traffic on the existing A57T on Hyde Road and Mottram Moor, and on A57 Woolley Lane. These benefits are considered to outweigh the effect of the one receptor with a 'small' increase in concentrations (Table 3-12 Significance for Human Health), although the significance of these results is not assessed.

4.5.25 Sixteen receptors continue to experience exceedances of NO<sub>2</sub>. Fifteen (R23-32 inclusive, R37, R358, R365, R468, R535) are households along Market Street in Hollingworth where traffic flows would be unchanged. The remaining single receptor R319 just outside the northern boundary of the Dinting Vale AQMA, which already exceeds the AQS objective for NO<sub>2</sub> in 2025, has a small increase in concentrations with the Scheme due to traffic flow increasing on the A57 north of Dinting Vale Junction (ES Ch.5, 5.7.17).

#### 4.5.26 ***Air Quality Management Areas (AQMAs)***

##### ***(a) Greater Manchester Combined Authorities (GMCA)***

With the scheme in place in 2025, 36 receptors would remain above 35µg/m<sup>3</sup> and 15 receptors would remain above 40µg/m<sup>3</sup>. The majority of these are alongside the A628T as it passes through Hollingworth within the GM AQMA. However, east of the AQMA boundary there are two exceedances at R37 (44.6µg/m<sup>3</sup>) and R468 (46.2µg/m<sup>3</sup>) and two levels which exceed 35µg/m<sup>3</sup> at R45 (36.6µg/m<sup>3</sup>) and R363 (35.1µg/m<sup>3</sup>) which suggest the AQMA should be extended.

##### ***(b) High Peak Borough Council<sup>187</sup>***

(i) Dinting Vale AQMA along the A57 between the A626 Glossop Road and Dinting Lane was declared in December 2019, following 2 years of exceedances of NO<sub>2</sub> of 53.6µg/m<sup>3</sup> in 2018 and 49.2µg/m<sup>3</sup> in 2019. Only half the AQMA was included in NH's air quality study. The single exceedance of the Limit Value and of the AQS objective that worsens with the scheme is adjacent to the junction between the A626 Glossop Road and the A57 Dinting Vale, and just outside the northern boundary of the AQMA. The AQMA may need extending.

(ii) Tintwistle AQMA along the A628T was declared in August 2018. The 2019 data showed a marked improvement in Air Quality with the AQMA, with no exceedances in the AQS observed. An action plan was not progressed until the results of the applicant's air quality

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<sup>186</sup> ES Ch 5 is inconsistent on numbers and reports both 60 and 57 receptors has having decreases to below legal limit. '5.12.5 The air quality within the study area changes from exceedances of the annual mean NO<sub>2</sub> AQS objective in the opening year at 76 modelled sensitive receptors without the Scheme to 16 receptors with the scheme in place. Of these 76 receptors, 75 have a decrease in concentrations (improvement), with **60 no longer exceeding** when the Scheme is in place. These receptors are located adjacent to the A57 in Mottram, at the Gun Inn Junction, and adjacent to the A628 north of the Gun Inn Junction. Of the 75 decreases, 66 have a 'large' decrease with the Scheme, and **57 of the 66 decrease to such an extent that exceedances of the annual mean NO<sub>2</sub> AQS objective are removed** with the Scheme in place. The decreases in concentrations are primarily due to a reduction in traffic flow on the existing A57 on Hyde Road, Mottram Moor and Woolley Lane as traffic transfers to the new link roads. The reduction in traffic on the existing A57 results in a reduction in emissions and therefore an associated reduction in concentrations at adjacent receptors.' Which is it 60 or 57 receptors that no longer exceed AQS objective? Table A-3 Appendix 5.5 says 60

<sup>187</sup> HPBC AQAP In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management Sept 2020

assessment along the A628T were available. No diffusion tubes for monitoring by either HPBC or the applicant are shown in ES Figure 5.1.

4.5.27 Without all the essential information it is not possible to conclude the scheme would not jeopardise compliance of AQS objective for NO<sub>2</sub> in all Tintwistle and Dinting AQMAs. In the GMCA AQMA continuing exceedances along the A628 would jeopardise compliance with the AQS NO<sub>2</sub> objective.

### **Other effects**

4.5.28 There are a number of locations where the annual mean NO<sub>2</sub> concentrations would increase but would remain below the legal limit and the AQS objective. Twenty five per cent of 621 receptors would experience increases<sup>188</sup>, the majority being small. The location of these increases are around Woolley Bridge, and on High Street East and A57 Sheffield Road through Glossop<sup>189</sup>. Around the Mottram underpass portals receptors R89, R132, R135, R133 and R136 would all see increases in NO<sub>2</sub> of up to 4µg/m<sup>3</sup>, but levels remain below 20µg/m<sup>3</sup> (Appendix 5.5. Table A-3). R125 near the Brookfield junction experiences a medium increase of NO<sub>2</sub> but remains within the legal limit.

4.5.29 In other parts of the air quality study area, annual mean concentrations already below the AQS objective, would decrease. Around the Mottram Moor junction receptors R98, R99, R183 and R186 which have levels below 40 µg/m<sup>3</sup> all experience a 'large decrease' of >4 µg/m<sup>3</sup>. Around the River Etherow junction R103 experiences a large decrease.

### **Air Quality Directive - Compliance Risk Assessment**

4.5.30 Qualifying features for compliance risk assessment include public access (e.g. footpath) and sensitive receptors (e.g. residential properties, schools etc) within 15m of the running lane / kerbside, but not within 25m of a junction<sup>190</sup>. Out of 1084 such features<sup>191</sup>, 380 were at risk of increased annual mean NO<sub>2</sub> – of which 333 (or 24%) would be at risk of small increases, 25 (or 1.8%) at risk of medium increases and 22 (or 1.6%) would be at risk of large increases.

4.5.31 There are two exceedances of the Limit Value in 2025 with the scheme. The modelled annual average NO<sub>2</sub> for receptor PA 219 is 42.5 µg/m<sup>3</sup> and for PA 220 is 41.0 µg/m<sup>3</sup>. The change between the do minimum and the do something scenario is respectively -0.9 µg/m<sup>3</sup> and -4.5 µg/m<sup>3</sup> for these receptors.

4.5.32 According to DMRB there is no risk to the UK's reported ability to comply with the Air Quality Directive [Ref 4.N] in the shortest timescale possible where:

- 1) there is no modelled exceedances of the air quality thresholds for any PCM link; or
- 2) there are modelled exceedances of the air quality thresholds for any PCM link, but the change in annual mean NO<sub>2</sub> concentrations between the do minimum and do something is less than or equal to +/-0.4 µg/m<sup>3</sup>; (sic)

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<sup>188</sup> ES Appendix 5.5 Air Quality Model Table A-3 Estimated Annual Mean NO<sub>2</sub> results concentrations µg/m<sup>3</sup> for human health receptors

<sup>189</sup> ES Ch.5 Air Quality 5.7.18

<sup>190</sup> DMRB LA 105 2.23

<sup>191</sup> Air Quality Appendix 5.5 Table A-6 Estimated mean annual NO<sub>2</sub> results at qualifying features for compliance risk assessment

*3) the project does not materially impact on measures within local air quality or national plans for the achievement of compliance.*

4.5.33 With the proposed development there are two modelled exceedances; the change in annual mean NO<sub>2</sub> concentrations between the do minimum and do something for both receptors is *'greater than +/-0.4 µg/m<sup>3</sup>'*; the scheme has a material impact on measures within the Greater Manchester's Delivery Plan<sup>192</sup> *'which has at its heart commitments to tackle poor air quality'*, based on a reduction in car trips and the Right Mix aim for 50% of trips to be made by sustainable means by 2040. Therefore there is a risk of the scheme impairing the UK's ability to comply with the Air Quality Directive.

4.5.34 Despite positive local outcomes air quality is valued as a -£3.8million disbenefit in the economic appraisal indicating increases in NO<sub>x</sub> and PM<sub>2.5</sub> over the ARN<sup>193</sup>. Although local receptors may experience reduced pollution, as the scheme redistributes it into the adjacent fields, overall the scheme worsens air pollution.

4.5.35 No mitigation is planned for the operational phase of the scheme<sup>194</sup>. *'There are not expected to be any significant adverse effects with the Scheme for the human health receptors, ecological sites (SSSI, SAC, SPA, LNR and non-statutory designations), or risk of compliance with the Air Quality Directive and so mitigation of the operational impacts for these receptors is not required.'*

## Conclusion

4.5.36 NH's claims for improvements in air quality are not substantiated by the evidence. Overall the scheme worsens air pollution but reduces the impact on local receptors by redistributing polluting traffic into the adjacent fields.

4.5.37 Fundamental data is missing from the DCO documents – the impact of the scheme on two AQMAs, its interplay with the GMCA CAZ, air quality with the scheme in 2040 and the scheme's impact on PM. As AQMAs are *'particularly relevant'* (NPSNN 5.11) to the Secretary of State's decision, the applicant's exclusion of 2 AQMAs adjacent to the scheme is contrary to national policy requirements. NPPF 2021, 186 also requires developments to take into account the presence of AQMAs and Clean Air Zones.

4.5.38 The assessment of air quality has not considered the air pollutant limits set by regional and local authorities for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>, as is required by the EIA regs and NPSNN. Of all the 621 modelled receptors, 7% would exceed 35µg/m<sup>3</sup> annual average NO<sub>2</sub> with the scheme in 2025, the precautionary level set by GMCA in 2016. All 621 receptors would be above 10µg/m<sup>3</sup>, the new lower standard set by WHO for NO<sub>2</sub> and adopted by GMCA<sup>195</sup>. There is therefore a strong risk of non-compliance with AQS objectives, which is contrary to NPSNN 5.13. The continuing exceedances of NO<sub>2</sub> and one receptor with worsening of pollution, could lead to extensions to GMCA and Dinting Vale AQMAs.

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<sup>192</sup> GMCA Our 5 year Transport Delivery Plan 2021 -2026

<sup>193</sup> Case for the Scheme Table 5-1; 7.9

<sup>194</sup> ES Ch.5, 5.8.3

<sup>195</sup> [REDACTED]

4.5.39 The failure to consider GMCA's ambitions for air quality is a serious omission and contrary to Greater Manchester's Joint Plan '*Places for Everyone*' which seeks radical reductions in air pollution<sup>196</sup>. To address the AQMA, GM's Air Quality Action Plan 2016-2021 prioritises:

- Reduce Traffic – for instance by encouraging modal shift from private vehicle use to public transport, cycling and walking.
- Increase Efficiency – of traffic movement by reducing congestion and stop-start travel to achieve a smoother emission profile and overall lower emissions, which may be particularly significant at peak hours.
- Improve Fleet – by incentivising the replacement of older, more polluting vehicles with newer, smaller, cleaner, lower-emission vehicles.

4.5.40 The applicant has a direct role to play in achieving the first two priorities but is proposing to increase traffic and thereby encourage car dependency. The scheme could therefore jeopardise compliance of this non-compliant AQMA and delay achievement of its AQS objectives.

4.5.41 There is also a risk of non-compliance with the Air Quality Directive, which is contrary to NPSNN 5.9 and NPPF 2021, 186.

4.5.42 Overall these results weight negatively in the planning balance for the scheme.

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<sup>196</sup> *Places for Everyone*, the Joint Development Plan for 9 of the 10 districts of Greater Manchester Aug 2021, para 3.3

## 4.6 EFFECTS ON THE GREEN BELT

### Summary of CPRE's assessment of Green Belt Effects

4.6.1 The Scheme would cross the Green Belt to the north of Mottram and between Hollingworth and Mottram<sup>197</sup>, and between Hollingworth and Glossop, conflicting with the purposes of the Green Belt, and harming its openness. The scheme is inappropriate development in the Green Belt for which no very special circumstances exist<sup>198</sup> for it to proceed.

### The Scheme is Inappropriate Development in the Green Belt

4.6.2 NPSNN para 5.178 states that when located in the Green Belt NSIPs may comprise inappropriate development. Inappropriate development is by definition harmful to the Green Belt and there is a presumption against it except in very special circumstances.

4.6.4 The question of whether or not a NSIP qualifies as transport infrastructure that is 'not inappropriate' in the Green Belt has been raised at two recent examinations into DCO applications, the A38 Derby junctions and the A19/A184 Testo's junction alterations.

4.6.5 In the case of the A38 Derby junctions<sup>199</sup>, the Proposed Development requires a Green Belt location because it comprises the upgrading of existing linear infrastructure in the Green Belt.

4.6.6 In the case of the A19/A184 Testo's Junction Alteration<sup>200,201</sup> both the Examining Authority and the Secretary of State considered that the Development Plan proposal support provided for the proposed development through a site allocation establishes that it is '*local transport infrastructure which can demonstrate a requirement for a Green Belt location*' (NPPF 2021 paragraph 150c). Therefore, it is not inappropriate development in the Green Belt provided that it preserves the openness of the Green Belt and does not conflict with the purposes of including land in Green Belt.

4.6.7 We do not believe this interpretation of policy should apply here as the A38 Derby Junctions DCO application is a proposal to upgrade a scheme that had already crossed and therefore impacted on the Green Belt in its current form with junctions, signage and large, planted embankments. The A19/A184 Testo's junction alteration was also an upgrade of an existing scheme. In contrast the A57 Link Roads would be a completely new development across the Green Belt. On this basis we hold the view that this scheme cannot claim to be appropriate development.

4.6.8 Certain forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it (NPPF 2021 para 150). These include:

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<sup>197</sup> Tameside Unitary Development Plan Part 2, adopted Nov 2004, Proposals Map

<sup>198</sup> Case for the Scheme 7.5.1-7.5.44

<sup>199</sup> TR010022-001426-TR010022\_A38 Derby Junctions\_Recommendation Report\_FINAL and appendices.pdf (planninginspectorate.gov.uk), Para, 4.5.38 – quoted in A57 Link Roads Case for the Scheme para 7.5.9

<sup>200</sup>

para 4.18.78

<sup>201</sup> Decision letter

c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;

4.6.9 To show the regional/local nature of the development, the applicant uses the Tameside UDP 2004 policy T2: Trunk Road Developments, which safeguards the line of the Mottram to Tintwistle bypass, to support its arguments that the scheme is not inappropriate development<sup>202</sup>. The line of the Glossop Spur was also safeguarded in Policy T3 Highway Schemes<sup>203</sup> but the applicant makes no reference to it. The Tameside UDP is now fourteen years old and has not been reviewed (see 4.1 Introduction). Transport policies have been transformed by radical national and regional targets to cut urban traffic and increase walking and cycling to 50% by 2030 in DfT's Decarbonising Transport and by 2040 in Greater Manchester's Right Choice policy. Providing new road capacity which would undermine the achievement of these targets challenges the legitimacy of safeguarding for the proposed development.

4.6.10 As we have shown elsewhere alternatives to the Scheme exist and have not been robustly developed, therefore the scheme remains inappropriate development on this basis.

4.6.11 In conclusion the scheme represents inappropriate development and therefore is harmful to the Green Belt. However if the opposite view is taken and it is appropriate development, NPPF 2021 para 150 requires '*it must preserve openness of the Green Belt and must not conflict with the purposes of including land within it Green Belt*'. In our view the scheme conflicts with the purposes of the Green Belt and harms the openness of the Green Belt.

### **The Scheme Conflicts with the Purposes of the Green Belt**

4.6.12 The Government attaches great importance to Green Belts (NPPF 2021 para 137). The essential role of the Green Belt<sup>204</sup> is to:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.6.13 The scheme's adverse effects on the first 4 purposes of the Green Belt<sup>205</sup>, which lies within Tameside and High Peak Borough, are as follows.

a) We consider there is sufficient contiguity between Hattersley and Mottram/Spout Green with Greater Manchester to consider them part of a 'large built up area'. Hollingworth is close enough to the core urban area that is Glossop/Hadfield/Padfield to consider it too part of a 'large built up area'. Any expansion of either of these built up areas or linkage between them would constitute sprawl. Green Belt land plays a strong role here as the land is close to, but not isolated within, the large built up areas and is still connected to the wider Green

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<sup>202</sup> Case for the Scheme 3.3.5

<sup>203</sup> [REDACTED]

<sup>204</sup> NPPF July 2021

<sup>205</sup> Cannock Chase Green Belt Harm Assessment, LUC, Feb 2021

[REDACTED]

Belt in Tameside and High Peak. We believe the scheme would weaken the purpose of the Green Belt in this area.

The bypass would pass to the north of Mottram and cut through between Mottram and Hollingworth creating separate parcels of Green Belt where sprawl could occur. The parcels of land between the urban boundary and the new road would be ineffective as Green Belt as the existing boundary depends on gardens and is weak. The new road would create a new significant hard boundary, making these isolated parcels indefensible to development<sup>206</sup>. In the past, consideration has been given to employment land, housing development and a hotel conference and leisure complex in the vicinity of the scheme<sup>207</sup>. The 2016 Greater Manchester Spatial Framework included land, which has since been removed, at the M67 J4 roundabout for employment uses. The 2018 call for development sites led to the triangle of land between Edge Lane, Hyde Road and Roe Cross Road being put forward for housing development that was rejected.

TMBC UDP 2004 Policy OL3 Major Developed Sites in the Green Belt allows limited infilling at major existing developed sites. Although emerging policy in the Greater Manchester Spatial Framework, Places for Everyone<sup>208</sup>, JP-G 10 The Green Belt (Appendix A: Replaced Local District Plan Policies) would provide the framework for TMBC's Local Plan, potential remains for such infilling here. At a practical level, the Mottram Conservation Area Management Proposals anticipate continued pressure for residential development due to Mottram being an attractive place to live.<sup>209</sup> *'This pressure is likely to manifest itself in the form of further conversions along with infill and backland development which is potentially far more damaging. Many of the open spaces within the area are protected by Green Belt and recreation policies, but nonetheless face continued pressure for residential development owing to the built character and natural beauty of the area'*.

b) The Green Belt separates Spout Green/Mottram, from Stalybridge, from Hollingworth and from Glossop. The perceived separation of these settlements is reduced because the Green Belt land lies in a narrow gap between Spout Green and Stalybridge where it is crossed by Roe Cross Road, and between Mottram and Hollingworth where it is crossed by the A57T with ribbon development. Both these gaps are very fragile and the purpose of the Green Belt here is strong. The Green Belt between Mottram/Spout Green and Dukinfield is slightly less fragile as it is a moderate gap with no sign of separating features. However overall the perception of separation would be further reduced by the new roads as they encircle the settlements and create the impression that neighbouring settlements are merging into one another, thereby weakening this purpose of the Green Belt.

c) The proposed dual and single carriageways would be remote from both settlements. They represent a substantial encroachment into open countryside in area. Overall 41.9ha<sup>210</sup> of Green Belt would be required permanently for the scheme of which 53% - 22.28ha<sup>211</sup> - would be required for the road. In addition to absolute land take encroachment occurs by

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<sup>206</sup> *The Impact of Road Projects in England* Report for CPRE, 2017, Sloman et al;

[REDACTED]; Concrete and Tyres The development effects of major roads: A case study of the M40, P Headicar and B Bixby, 1992, commissioned by CPRE, Executive Summary;

<sup>207</sup> List of Revisions to First Deposit Draft Replacement Plan, Tameside UPD July 2001 E1(3); Pat Ellison per comm.; Tameside application 88/06/22441

<sup>208</sup> [REDACTED] JP-G 10 repeats the NPPF on Green Belt; Map 8.6 shows its extent.

<sup>209</sup> Mottram in Longdendale Conservation Area and Management Proposals, TMBC, March 2013, para 6.14

<sup>210</sup> Case for the Scheme 3.4.40

<sup>211</sup> Case for the Scheme 7.5.1

making the countryside more remote from residents; by creating small pockets which function poorly as countryside; and by intruding upon that usage which now has to take place next to roads busy with traffic. There are public footpaths across the Green Belt but land use is not that specifically associated with urban areas e.g. school playing fields or recreation grounds.

The settlements are intimately associated with the surrounding countryside. Their communities value their local green spaces as places of local distinctiveness that provide opportunities to engage with nature close to where they live and work, and that help to encourage a sense of community<sup>212</sup>. The use of the north eastern part of the Green Belt as the Mottram Agricultural Showground is a most forceful representation of this connection to the area impacted by the scheme.

The countryside also has essential functions which would be disturbed and encroached upon by the scheme. Open land is a finite irreplaceable asset in the UK. It is both natural capital and strategic open space, which supports multiple ecosystem services agriculture for the production of food, access for recreation, wildlife habitats, resilience to climate change and reduction of flood risk, and sequestration of carbon. Such ecosystem services are critical to urban areas which have higher vulnerability to climate change due to their lack of habitats. The fragmented nature of the habitats in this area already restricts species movement and ecosystem functionality. The new roads and their traffic would reduce the permeability of the countryside for wildlife, further fragment habitats, increase injury and death for species trying to cross the roads and pollute air and water. Providing an underpass is a limited means of access, hence the reason why special measures are proposed in this instance for bats, deer, badgers and other mammals. The scheme passes through an area of flood risk 2 and 3 where it crosses the River Etherow and its flood plain within High Peak. Moving the traffic into the countryside also encroaches upon the relative tranquillity of the Green Belt in all three areas.

d) The proposed development would not preserve the setting and special character of the historic town of Mottram. We consider the Green Belt fulfils this purpose as Mottram is a designated conservation area based on its historic buildings and its character depends on its landscape setting to which Green Belt land makes a contribution. The open rough pasture to the east of the village of was included in the 1978 revision to the Conservation Area boundary '*owing to the integral part it plays in the setting of Village*'<sup>213</sup>. This area is now included within the Green Belt and is undeveloped. It borders a small section of Mottram Moor, allowing wide views to St. Michael's Church and the back of Market Street. It continues to form an important part of the Conservation Area. The interaction between the built and natural environment (Pennine hills, green spaces, large areas of open space) defines the character and the setting of the Conservation Area. TMBC Policy C2 Conservation Areas requires that views within and out of the Conservation Area should be safeguarded. The photomontage from viewpoint 16 (Fig 7.9 ix) shows the important visual dimension to the preservation of the historic setting of Mottram, for instance when seen from a distance across green fields on Harrops Edge.

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<sup>212</sup> 5.1 Consultation Report

<sup>213</sup> Mottram in Longdendale Conservation Area and Management Proposals, TMBC, March 2013 paras 5.3 & 12.1



e) No evidence has been supplied to demonstrate that the A57 Link Roads would assist in urban regeneration, by encouraging the recycling of derelict and other urban land that is not in the Green Belt.

4.6.14 In summary the scheme conflicts with four out of five purposes of the Green Belt and therefore contravenes all statutory plans that protect the Green Belt<sup>214</sup>.

### **The Scheme Harms the Openness of the Green Belt**

4.6.15 Government guidance<sup>215</sup> identifies factors that can be taken into account when considering the potential impact of development on the openness of the Green Belt. Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the Courts have identified a number of matters which may need to be taken into account in making this assessment (more recent case law has considered this<sup>216</sup>). These include, but are not limited to:

*‘both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;  
the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and  
the degree of activity likely to be generated, such as traffic generation’.*

*‘The effect can be offset by compensatory measures such as*

- *new or enhanced green infrastructure;*
- *woodland planting;*
- *landscape and visual enhancements (beyond those needed to mitigate the immediate effect of the proposal);*
- *improvements to biodiversity, habitat connectivity and natural capital;*
- *new or enhanced walking and cycle routes; and*
- *improved access to new, enhanced or existing recreational and playing field provision.’*

4.6.16 NH deals with the openness of the Green Belt in ES Landscape Ch 7<sup>217</sup> and concludes that *‘during the operational phase, and following mitigation, effects on the Greenbelt would include the new highway, and its traffic, and associated structural features. These would likely reduce pastoral agricultural land use and woodland. However, the overall openness and function of the Greenbelt would remain mostly unaffected.’*

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<sup>214</sup> Tameside Unitary Development Plan Part 2, adopted Nov 2004, Policy OL1 Protection of the Green Belt; Derby & Derbyshire Structure Plan Adopted Jan 2001, General Development Strategy Policies 6 General Location of Green Belts & 7 Policy Affecting Green Belt and Environment Policy 4: Environment Priority Areas; High Peak BC Local Plan adopted March 2016, Policies EQ4, page 78; Places for Everyone, Greater Manchester Spatial Framework, emerging, 2021 Policy JP-G 10 The Greater Manchester Green Belt

<sup>215</sup> [REDACTED] 22 July 2019

<sup>216</sup> Supreme Court’s judgment [REDACTED] judgment R (Samuel Smith Old Brewery (Tadcaster) and others) (Respondents) v North Yorkshire County Council (Appellant) [2020] UKSC 3 e (the Samuel Smith case) - The matters relevant to openness in any particular case are a matter of planning judgement, not law. Fundamentally, whether visual impact forms part of the consideration and assessment of openness is a matter of planning judgement for the decision maker and there is nothing in law to say that it should be taken into account as part of that consideration or that openness is never relevant to that assessment.

<sup>217</sup> ES Ch 7 Landscape 7.9.9-7.9.10

4.6.17 The openness of the Green Belt – or the open character of the landscape - has both a spatial and visual aspect. The spatial aspect means the absence of development. The Green Belt locally contains no inappropriate development except for the sewage works just north west of Gamesley. Into this open Green Belt this 22.28ha NSIP would place 1.8Km of dual and 1.3Km of single carriageways, underpasses for Old Mill Farm and for Carrhouse Lane, an over-bridge at Roe Cross Road, a bridge over the River Etherow, two tunnel portals, a major new junction, modifications to the M67 J4 roundabout, signs, lighting posts and incongruous post and rail fencing, and a structure for roosting bats in the Green Belt. One underpass might be considered to have only a modest spatial impact but the quantum of all these permanent structures would not preserve the openness of the Green Belt.

4.6.18 Despite the claim by NH that the dual carriageway is designed to sit at a low level in the landscape<sup>218</sup> it is raised up to 4.7m above existing ground level for most of its length<sup>219</sup> until it enters the deep cutting for the Mottram underpass. The substantial earth banks along the road with a face height above ground level of up to 9.5m would be an uncharacteristic element and emphasise the linearity of the infrastructure. Post and rail fencing, hedges, lighting columns, signs, 2.6m high environmental barriers on top of the earthworks and drainage channels at their base would accentuate the effect. Similarly as the carriageway approaches Mottram Moor it would be elevated on an embankment 7.5m above existing ground level on the westbound carriageway side and 13.17m high on the eastbound carriageway side. Here it would require the addition of an environmental barrier on the east. These effects would have a substantial impact on the openness of the Green Belt.

4.6.19 The spatial effect of traffic using the new roads is a material consideration. The dual carriageway section would carry 30,100 vehicles daily, including 2,700 HGVs, and the single carriageway would carry 21,200 vehicles daily, including 1,060 HGVs. It is apparent from the cross sections that the HGVS would be intrude above any planting. Traffic lights at the M67 J4, on Mottram Moor, and at the Etherow bridge junction with the A57 would create standing traffic. At night a quiet and dark area would be lit both by road lighting and vehicle lights. The presence of traffic would be a very significant, negative change in the open character of the Green Belt compared to the current situation.

4.6.20 Visual impact is implicitly part of the concept of openness<sup>220</sup>. Greenness is a visual quality – part of the idea of the Green Belt is that the eye and spirit should be relieved from the prospect of unrelenting urbanisation or sprawl. The applicant claims that the highway route will be integrated visually into the existing landscape view and in most part screened from view<sup>221</sup>.

4.6.21 Unfortunately the photomontages are inadequate in helping to form a well-evidenced opinion. Traffic levels consistent with 30,000 AADT are missing from all of the photomontages and many of the viewpoints do not show the view with the scheme in place

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<sup>218</sup> Case for the Scheme 7.5.34

<sup>219</sup> ES Ch1-4 Introductory chapters Table 2-1 & Table 2-2 cutting and embankment slopes; Figure 2.7 Engineering Drawings (cross sections); ES Introductory Figures 2.1-2.4 see 2.2 for chainage

<sup>220</sup> [REDACTED] Turner v SoS for Communities and Local Government, ANOR, May 18, 2016

<sup>221</sup> Case for the Scheme Table 5-6

in the opening year or in design year 15. Only VP16 (Fig 7.9 ix) allows an assessment of the impact of the dual carriageway on openness to the north of Mottram. At design year 15, although trees would be concealing cars exiting/entering the Mottram underpass, Old Mill Underpass and the majority of the dual carriageway would be completely visible. The photomontage from VP4 from Roe Cross Road (Figure 7.9iii) looks north, specifically excluding the view to the west which would provide an uninterrupted view of the dual carriageway below streaming with traffic. The photomontage from VP8 (Fig 7.9v) clearly shows the intrusive visibility of the eastern part of the dual carriageway. However NH has used the topography in this VP to conceal the impact of the Mottram Moor junction which would intrude on openness as the slope of Warhill is descended. The detrimental visual impact on those using a number of public rights of way that cross the Green Belt is accepted by the applicant. The applicant claims that noise barriers would also diminish the impact of the scheme. However the deployment of such barriers is harmful in terms of the visual dimension of openness of the Green Belt. The visual dominance of this development increases association with the urban area.

4.6.22 In summary the scheme would permanently and substantially impair the openness of the Green Belt.

**‘Very special circumstances’ do not exist to outweigh the harm**

4.6.23 In our view the proposed development would harm the openness, and conflict with the purposes, of the Green Belt. Therefore ‘very special circumstances’ are necessary to justify it. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations (NPPF para 151 and NPS NN para 5.178).

*‘The question therefore is – is the harm caused to the openness and purposes of the Green Belt, and any other harm, clearly outweighed by the countervailing benefit arising from the development so as to amount to very special circumstances justifying an exception to the Green Belt policy? Is there ‘any other harm’, in addition to that that would be inflicted on the role of the Green Belt and its openness, which should be considered?’<sup>222</sup>*

4.6.24 We believe so. These include the effects of the scheme on Green Belt, landscape quality and visual amenity and on safety; and the increased carbon emissions in the face a climate emergency. Traffic generated by the development would impact adversely on Hollingworth, Mottram and Tintwistle, and on the Peak District National Park.

4.6.25 We address the planning balance for this development in the table below and find very special circumstances, which should be a rarity, do not exist. The elements that harm the Green Belt are greatly outweighed by the effect of the scheme even with mitigation.

**Conclusion**

4.6.26 The harm caused to the openness of the Green Belt and the conflict with the purposes of the Green Belt by the scheme are not outweighed by the benefits arising from

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<sup>222</sup> Redhill Aerodrome Ltd v SSCLG [2014] EWCA Civ1386

the development. Therefore very special circumstances do not exist for the development to proceed.

### Very Special Circumstances for Development in the Green Belt – Planning Balance for A57 Link Roads

We have included only permanent effects of the scheme that would be seen during its operation.

**Text in green indicates a benefit.**

Countervailing benefit claimed by NH paras 7.5.19-7.5.21	CPRE comments
Need for the Scheme – Case for the Scheme 7.20.1	<ul style="list-style-type: none"> <li>The ‘compelling and crucial’ need is unproven. The need is to reduce the impacts of congestion and traffic on Mottram Hollingworth Tintwistle and Glossop, and on the PDNP.</li> <li>Alternatives exist to achieve this without harming the Green Belt.</li> <li><b>Only parts of Mottram would benefit.</b></li> </ul>
Aids connection between Greater Manchester (GM) and South Yorkshire (SY); supports journeys between local settlements, Hattersley, Mottram, Hollingworth, Glossop	<ul style="list-style-type: none"> <li>The only evidence to support this are journey times for parts of journeys between GM and SY, and between local settlements;</li> <li>Weather impacts across the PDNP that impair connectivity would not be resolved by scheme</li> <li>Communities in Hollingworth and Tintwistle along A628T would continue to experience all the adverse impacts of traffic and its environmental impacts; traffic would increase through Glossop on residential streets and on the A57 Snake Pass;</li> <li><b>Severance would decrease in Mottram and on Woolley Lane assuming traffic calming is implemented and effective;</b></li> <li>Severance would increase for communities along A628T and those in Glossop.</li> </ul>
Increasing capacity	<ul style="list-style-type: none"> <li>Effectiveness of increased capacity would not be sustained due to traffic generation by the scheme and by new housing developments in Glossopdale based on car travel. For previous NH schemes<sup>223</sup> average increases in traffic over 3-7 years were +7%. Average increases over 8-20 years were +47%. These increases were over-and-above background traffic growth.</li> <li>This benefit could be achieved by making best use of existing infrastructure, as we have shown with our package of measures.</li> </ul>
Reducing congestion and delays	<ul style="list-style-type: none"> <li><b>Congestion would be removed from parts of Mottram</b></li> <li>This benefit would not be sustained due to traffic generation, as in cell above.</li> <li>This benefit could be achieved by making best use of existing infrastructure, as we have shown with our package of measures.</li> </ul>
Improving safety and reducing incident rates	<ul style="list-style-type: none"> <li>The A57 Link Roads would worsen safety on the trunk route, within Glossop, on the A57 Snake Pass and on the wider network.</li> </ul>
Minimising impact on noise	<ul style="list-style-type: none"> <li>Impact recorded by NH as non-significant.</li> <li><b>Scheme routes traffic away from a Noise Important Area</b> but relocates traffic noise to other receptors.</li> </ul>

<sup>223</sup> The Impact of Road Projects in England Report for CPRE, 2017, Sloman et al;

<p>Case for the Scheme Table 5-4</p>	<ul style="list-style-type: none"> <li>Noise levels for many remain above acceptable limits.</li> <li>This benefit would not be sustained as traffic increases would negate it.</li> <li>This benefit could be achieved by making best use of existing infrastructure, as we have shown with our package of measures.</li> </ul>
<p><b>Minimising air quality</b> Case for the Scheme Table 5-2</p>	<ul style="list-style-type: none"> <li>Increased outputs of NOx and PM<sub>2.5</sub> over the study area – a disbenefit</li> <li><b>Improved air quality for all but one local receptor</b></li> <li>This benefit would not be sustained as traffic increases would negate it.</li> <li>This benefit could be achieved by making best use of existing infrastructure, as we have shown with our package of measures.</li> </ul>
<p><b>Protecting access for WCHs</b> Case for the scheme 3.4.45</p>	<ul style="list-style-type: none"> <li>Replacement connections for existing footpaths and bridleways severed by scheme – irrelevant as required by planning law.</li> <li>Improved pedestrian and cyclist crossing facilities at M67 Junction 4, other existing junctions and all new junctions – first two are irrelevant as they could be achieved without scheme. New junction on Mottram Moor requires such facilities.</li> <li>PRoW LON 52-20, upgrade from a footpath to bridleway – irrelevant; could be achieved without scheme</li> <li><b>Footway and cycleway along new A57 Link Road</b></li> <li><b>A new bridleway from Mottram Moor Junction to Old Hall Lane extending connection to the Trans-Pennine Trail to the north of Mottram</b></li> <li>Pedestrian and cyclist crossing facilities at the proposed Woolley Bridge Junction – irrelevant; could be achieved without the scheme.</li> <li>Old Mill Farm Underpass and Carrhouse Lane Underpass – irrelevant; only required because of scheme</li> <li><b>New public space above Mottram Underpass</b></li> </ul>
<p><b>The Tameside UDP policy T2 Trunk Road</b></p>	<ul style="list-style-type: none"> <li>Route of scheme is safeguarded in the TMBC UDP, which in our view is out of date, given the radical policy requirements to reduce traffic;</li> </ul>
<p><b>The Scheme has been through a rigorous assessment process and was included in the first RIS (2014) and continues to be a committed scheme in RIS2 (2020).</b></p>	<p>Irrelevant - every scheme should go through a rigorous assessment whether or not it impacts on the Green Belt. We have shown elsewhere that the 'rigorous assessment' (the 2015 Trans-Pennine Routes Feasibility Study) looked only at a road solution and did not commence with the webTAG requirement to define the problem that needs solving. As shown by the poverty of evidence supplied by NH for the 2020 statutory consultation into the A57 Link Roads, the scheme's inclusion in Road Investment Strategies 1 and 2 is not based on a rigorous assessment.</p>
<p><b>Significant landscaping to minimise impacts</b></p>	<p>Irrelevant - development and design of major highway projects is governed by standards set out in the DMRB. Design is also guided by Highways England's 'Road to Good Design' (2018). Landscaping is expected of any development; landscape improvements could be achieved without the new road.</p>

	<p>The use of cuttings, false cuttings and embankments creates a topography not associated with the flat plain of Hurstclough Brook or with the eastern slopes of Mottram Moor and of Warhill.</p> <p>There are no landscape or visual enhancements beyond those needed to address immediate impacts of the scheme. NH refuses to consider landscape mitigation for impacts on the PDNP.</p>
<b>Land take minimised</b>	Irrelevant – dual and single carriageway roads have specific land take requirements; 22.28ha of land would be lost from the UK’s finite land bank.
<b>Potential benefits not claimed by NH for very special circumstances</b>	<b>CPRE comments</b>
<p><b>Biodiversity</b> Case for the Scheme Table 5-6</p>	<ul style="list-style-type: none"> <li>• NH records impacts as non-significant. It claims to be creating new habitats, minimising habitat fragmentation and providing sufficient essential mitigation for protected species such as deer, bats and badgers.</li> <li>• During operation: <ul style="list-style-type: none"> <li>— A net increase in woodland (loss 0.73ha; gain 6.08ha), wet woodland (loss 0.1ha; gain 0.65ha), lowland acid grassland (loss 0.3ha; gain 1.64ha), lowland scrub and flood plain mire (loss 0.3ha; gain 1.13ha);</li> <li>— 6,000metres of new hedgerows (3,300 metres lost);</li> <li>— Bats, otters and common toads experience slight benefits.</li> <li>— Hurstclough Brook experiences slight adverse impacts</li> </ul> </li> <li>• However the detrimental effects of roads on nature (from lighting, noise and road kill) outweigh any advantages to wildlife; both in the short-term and particularly in the long-term<sup>224</sup>. Therefore the weight of these elements comes out as neutral and no weight is applied to them in the planning balance.</li> </ul>
<p><b>Landscape and visual impacts</b> Case for the Scheme Table 5-6</p>	NH records impact as non-significant for both landscape and townscape; however we believe the landscape and visual impacts would be significant and count as a disbenefit in the planning balance.
<p><b>Cultural Heritage</b> Case for the Scheme 7.15</p>	A permanent negative effect would result on one of the 51 heritage assets within the study area - Tara Brook Farm - due to the alteration of its setting. We believe there would also be a permanent negative effect on the Mottram Conservation Area.
<p><b>Greenhouse gas outputs</b> Case for the Scheme Table 5-3</p>	NH dismisses carbon emissions as negligible. In the context of the climate crisis this is a gross disbenefit.
<p><b>Water Environment</b> Case for the Scheme Table 5-6</p>	NH records no significant impact on the water environment either through the floodplain or the surface run off; however the evidence is incomplete.

<sup>224</sup> Effects of Road Density and Pattern on the Conservation of Species and Biodiversity, Bennett V, Curr Landscape Ecol Rep (2017) 2:1–11; Handbook of Ecology Ch 28 The Impacts of Roads and Traffic on Terrestrial Animal Populations, Rytwinski T, Fahrig L

## 4.7 EFFECTS ON LANDSCAPE AND VISUAL IMPACT ASSESSMENT

### Summary of NH Assessment of Effects

4.7.1 By the design year (Year 15) there would no significant effects on landscape or townscape character; three representative viewpoints and twelve visual receptors would continue to experience significant effects. There would not be any significant indirect effects on landscape character or visual amenity within the Peak District National Park due to increases in traffic.

### Context

#### *Landscape Profiles*

4.7.2 The scheme lies within two coincident landscape character areas (a) National Character Area Profile (NCA) 54 Manchester Pennine Fringe<sup>225</sup>, the transitional zone between the open moorlands of the Dark Peak and Southern Pennines, and the densely populated conurbation of Manchester; (b) the Dark Peak Western Fringe (DPWF) Landscape Character Area<sup>226</sup> (LCA) as defined by the PDNPA. NH has divided these two landscape character areas into scheme level LCAs (SLLCA) and townscape character areas (SLTCA)<sup>227</sup>. We will also refer to the Greater Manchester Landscape Character and Sensitivity Assessment that accompanies the *Places for Everyone* Joint Plan<sup>228</sup> (August 2018) that NH has ignored. Assessment using all these LCAs and LCTs<sup>229</sup> is substantially the same but with some subtle differences which will become apparent.

4.7.3 In summary the scheme would lie on the northern and western slopes of the River Etherow valley, a landscape with a network of springs, streams and localised damp hollows; pastoral farmland; and an abundance of trees, dense beside streams and settlements. On the valley floor the river follows a meandering channel with wet soils supporting wetland vegetation. Away from the settlements there are isolated farmsteads and small clusters of dwellings (along Edge Lane and Carrhouse Lane) and narrow lanes such as Coach Road.

4.7.4 NH has used Landscape Designations and Landscape Character Types (Table 7.28) as landscape receptors, which is acceptable for overall character but does not address the effects on individual elements, or features, or specific aesthetic or perceptual effects. To address this omission we have spelt out important individual elements.

#### *Consultation results*

4.7.5 It is important to remember what local people think about this landscape. The consultation questionnaire asked specific questions about the local landscape. Q13a *Would you describe the landscape surrounding the Scheme as particularly important to you?* Q13b *If yes, what are the three most important natural, or man-made features of this landscape to you?* The majority 972/1441 (67%) agreed the landscape was particularly important. The most valued elements were its natural, green, undeveloped character, with beautiful, open

<sup>225</sup> [REDACTED]

<sup>226</sup> Landscape Strategy and Action Plan PDNPA 2009; Dark Peak Western Fringe Valley Pastures with Industry Landscape Character Area; Dark Peak Western Fringe River Meadows LCA.

<sup>227</sup> Figure 7.3 Scheme character

<sup>228</sup> Greater Manchester Landscape Character and Sensitivity Assessment, 2018, page 89

<sup>229</sup> DCC Landscape Character of Derbyshire 2013 and HPBC Landscape Character Supplementary Planning Document 2006 concord with all the LCAs and LCTs but cover a very small area of the River Etherow and its adjacent meadows.

<sup>230</sup> 5.1 Consultation report Tables 8-21 and 8-22 presents the answers to these questions. However para 8.2 makes it clear that only the 1492 completed forms were analysed for these tables. Only 1441 answered Q13a.

views of countryside, the farmland, fields and meadows; the wildlife; the green, rolling hills and undulations, often in the distance; and the moors, including Hobson Moor, Mottram Moor and Woodhead. The peace and tranquillity, and the easy access to the countryside on footpaths and bridleways were also important. The most frequently mentioned feature was trees.

4.7.6 NH has scoped out of its assessment the majority of landscape elements described in the consultation responses and selected only a handful of named elements (ES Ch.7 Tables 7.4. and 7.5) for consideration and in a defective manner<sup>231</sup>. In the context of the European Landscape Convention (ELC)<sup>232</sup>, to which the UK is a signatory<sup>233</sup>, consultation comments should be a material consideration when assessing the landscape effects. The ELC adopts a broad definition of landscape as *'an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors'*. Landscape is important, not just as scenery or a backdrop, but because it links culture with nature, and past with present. It has many values not all of them tangible; it matters to, and is valued by, people and provides a context for people's lives. The ELC applies to all landscapes everywhere and in any condition and is concerned with the whole landscape not just the 'best bits'. It recognises the dynamic nature of landscape – managing the landscapes that we inherit, managing change and creating new landscapes. Good landscape is everyone's right; everyone has a right to be involved in determining its future. The consultation responses are important, should not be ignored, as NH has largely done, and should be a material consideration in the planning balance.

## LANDSCAPE EFFECTS

### Harrop Edge Valley Pasture<sup>234</sup>

#### Existing

4.7.7 Lying between the M67 J4 roundabout and Spout Green, this pastoral landscape has a strong open feel to it, which minimises the effect of isolated farms and buildings, pylons and inspection chambers. It slopes gently downhill in a westerly direction from Roe Cross Road in the east and Harrop Edge to the north<sup>235</sup>, to become waterlogged and flat around Hurstclough Brook. Despite its grazed and cropped fields edged by intermittent trees from outgrown hedges, it has an unsettled feel. This is largely due to the rushy growth, damp hollows, ponds, scrub and trees, most dramatically seen in the meandering passage of Hurstclough Brook<sup>236</sup>. It is also relatively tranquil, although disturbed by traffic noise from the M67, dark at night, and crossed by a rich network of footpaths. Roe Cross Road on a grassy bank forms an abrupt edge to the built environment (well shown in Figure 7.9iii photomontage from VP 2).

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<sup>231</sup> Table 7.5 is misleading and in error. VPs 1-3 are of the existing landscape and provide no future photomontage; VPs 4 & 8 have presentational bias; VP7 is not of the cricket pitch but of Mottram Moor; V-R-33 is not on Market Street in Mottram but on Church Brow with no views of Market Street; V-R-50 and V-R-53 are not on Woolley Lane but on the A57 at Brookfield.

<sup>232</sup> [REDACTED] European Landscape Convention Guidance, 2009, Natural England

<sup>233</sup> The ELC was signed by the UK government in February 2006 and came into effect in March 2007.

<sup>234</sup> LCT Pennine Foothills (Dark Peak); DPWF Valley Pastures with Industry LCA; SLLCA 1

<sup>235</sup> Representative Viewpoints Figure 7.9ii VP 1; Figure 7.9iii VP3

<sup>236</sup> Figure 8.3 Phase 1 Habitats Survey baseline; Appendix 8.1 Appendix I Watercourses; ponds from p189;



### Effects of Scheme

4.7.8 Despite the claim by NH that the dual carriageway is designed to sit at a low level in the landscape<sup>237</sup> it is raised up to 4.7m above existing ground level for most of its length<sup>238</sup> until it enters the deep cutting for the Mottram underpass. The substantial earth banks along the road with a face height above ground level of up to 9.5m would be an uncharacteristic element and emphasise the linearity of the infrastructure. Post and rail fencing, hedges, lighting columns, signs, 2.6m high environmental barriers on top of the earthworks and drainage channels at their base would accentuate the effect. Most of the sunken channel of Hurstclough Brook and its scrub<sup>239</sup>, a characteristic feature of the DPWF LCA and Manchester Pennine Fringe NCA, would be destroyed. The brook would be diverted through a culvert under the road and channelled to reconnect to the south of the road as a drainage ditch. Old Mill Farm concrete underpass, the concrete western portal of the Mottram underpass, and Roe Cross Bridge would insert utilitarian urban architecture. The concrete would be out of keeping with the gritstone wall adjacent to Roe Cross Road. Lighting on the road, in the underpasses and from traffic would create a ribbon of light in the dark. Traffic noise would spill into the wider countryside<sup>240</sup>. The earth banks would be planted with lowland mixed deciduous woodland edge species<sup>241</sup>, which by year 15 would have created linear plantations. Deciduous woodland is inappropriate in this waterlogged land, which if left ungrazed, would favour wet woodland. However half the scheme would appear as an elevated platform topped by a hedge. The effect would be a new raised corridor of traffic, emphasised by trees, and raised above the marshy ground. Altogether these features would introduce urban formality and strongly disturb the landform, character, tranquillity, and darkness of this pastoral landscape.

### **Mottram Moor Pasture<sup>242</sup>**

#### Existing

4.7.9 Mottram Moor Pasture, to the north of Mottram Moor, has no public access. Views of it from its periphery are limited by topography, trees and buildings. Mottram Moor Pasture is more intimate, secluded and enclosed than that below Harrop Edge, and evokes a strong rural feel. Its field layout is still recognisable on the tithe map circa 1850<sup>243</sup>, a feature it is considered important to conserve<sup>244</sup>. Its smooth green shoulder carries hedges, scattered trees and a pond as it descends through the parkland associated with Mottram Old Hall to Mottram Moor. A belt of mature tall trees stretching from Mottram Old Hall to Mottram Moor conceals the edge of Spout Green from view from the east.

### Effects of the scheme

4.7.10 The dual carriageway would emerge from the concrete eastern portal of the Mottram underpass in a deep cutting with four lanes of traffic. On its northern edge the cutting would reach a depth of 15.5m; on its southern edge it would reach a depth of 9.6m. The proposed

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<sup>237</sup> Case for the Scheme 7.5.34

<sup>238</sup> ES Ch1-4 Introductory chapters Table 2-1 & Table 2-2 cutting and embankment slopes; Figure 2.7 Engineering Drawings (cross sections); ES Introductory Figures 2.1-2.4 see 2.2 for chainage

<sup>239</sup> 2.12 Culverts and drainage plans; 7.7 Drainage Design Statement

<sup>240</sup> Figure 11.12 Operational Phase Long Term change with the scheme

<sup>241</sup> ES Introductory Figures 2.1-2.4; Table 8-15 Notable habitat losses and gains; 8.8.7-8.8.10 Deciduous woodland & wet woodland. Around the SUDS pond near the M67 roundabout wet woodland and other species for wet habitats would be planted but that is small area of the whole.

<sup>242</sup> GM Landscape Character and Sensitivity Assessment LCT Open Moorlands and Enclosed Uplands (Dark Peak); SLLCA 3

<sup>243</sup> ES Ch 6 Cultural Heritage Figure 6.4 Mottram in Longdendale, Hattersley and Hollingworth Tithe Map

<sup>244</sup> Greater Manchester Landscape Character and Sensitivity Assessment, 2018, page

banks of rock facing the road would jar on these softly sweeping green contours. The proposed planting and barriers to screen the cutting would bear no resemblance to the existing pattern of trees and hedges within the pasture. The dense tree cover along the eastern edge of Spout Green would be abruptly breached, leaving a straight sided gap, which the proposed planting of a hedge, scrub and individual trees would not rectify<sup>245</sup>. The field layout, hedges and the copse with its pond would be disrupted. The formality of the SUDS pond is no substitute in landscape terms for the random and natural surface water flows on this slope. All these effects would be out of character with that of Mottram Moor Pasture.

4.7.11 As the carriageway approaches Mottram Moor it would be elevated on an embankment 7.5m above existing ground level on the westbound carriageway side and 13.17m high on the eastbound carriageway side. Here it would require partial removal of the important hedge H24<sup>246</sup> and the addition of an environmental barrier on the east. Without tree cover on this section the dual carriageway would be a prominent disfiguring element of the landscape, particularly from Warhill.

4.7.12 There would be permanent loss of land used by the Mottram Agricultural Showground, which has been part of community social life for more than 100 years and was painted by L.S. Lowry. The show takes place twice a year with an average attendance of 8,000. It attracts visitors from the cities and is a vital way of demonstrating the importance of farming and the rural economy to a wider audience. Although a new site has been found no details are provided.

### **Etherow Valley Pasture<sup>247</sup>**

#### Existing

4.7.13 The network of river valleys extending from the hills in the north and east across Greater Manchester to the flat plains of the Mersey in the west is one of the city's most characteristic features. The River Etherow is one of these valleys. Upstream towards Tintwistle the river valley has been developed for industrial purposes but the stretch between Woolley Lane passing below Melandra remains open. Here the river meanders through a flat alluvial corridor with water logged soils, and scattered hedges and trees along its banks, an environment that the DPWF LCA considers unsuitable for road building as it is the informal flood plain of the Etherow.

4.7.14 Above the floodplain the valley slopes rise westward through pasture, hedges and copse to Mudd, Mottram with its Grade II\* church<sup>248</sup>, and the Mottram Conservation Area. This prominent ridge line<sup>249</sup> is considered of high sensitivity to any scale or type of development. It is a distinctive landmark from long distances and functions as an undeveloped skyline above the lower-lying urban areas set within the distant moorlands of the South Pennines and Peak District National Park<sup>249</sup>.

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<sup>245</sup> ES Ch 8. 8.8.9

<sup>246</sup> 2.13 TPO and Hedgerow Plans

<sup>247</sup> DPWF Valley Pastures with Industry; GM LCT Pennine Valley Pastures (Dark Peak); SLLCA 4. Where the scheme would cross the River Etherow it would lie within GM LCT Incised Urban Fringe Valleys and DPWF River Meadows LCA

<sup>248</sup> Photomontage VP 12 (Figure 7.9vii) from the flat floodplain looking up towards the Mudd

<sup>249</sup> Greater Manchester Landscape Character and Sensitivity Assessment, 2018, page 58-62

4.7.15 The valley side has little intrusion from the adjacent buildings, roads and moving traffic because the interface between urban and rural is edged with trees. Tara Brook rises in a deep gully close to Mottram Moor and creates an intimate topography. Networks of footpaths criss-cross the slope including the national Trans-Pennine Trail and Pennine Bridleway. Its naturalistic setting, high scenic value and pockets of rural tranquillity make it of high sensitivity to development.

#### Effects of the Scheme

4.7.16 The new crossroads at Mottram Moor, offset to the south of the existing road with realignment of the existing four lane carriageway, would release the existing trunk road from its effective containment by a thick line of high hedge. It would destroy the local topography around Tara Brook which would be culverted under the road. The only representation of the effect is the stylised flyover, which grossly under represents the change in land form and landscape character, prepared for the 2020 statutory consultation<sup>250</sup>. The profligate use of land for this junction has created infrastructure that is completely out of scale with its location and other junctions in the vicinity at the Gun Inn and at Mottram crossroads. The photomontage from VP 8 (Figure 7.9v) on Warhill has used the topography to conceal the effect of this junction.

4.7.17 From the junction the single carriageway road descends to the River Etherow floodplain. For the majority of its length the carriageway would be raised above ground level by between 2.6m and 4.8m. Earth banks between 6.2m and 8.9m high on their outer face adjacent to the west bound carriageway and one adjacent to the east bound carriageway would create mounds on an otherwise flat slope. The cut through the deciduous woodland would create a straight-sided gap. Two large attenuation ponds, drainage ditches, modern street lighting, traffic signals, signage, environmental/noise barriers, the concrete underpass for Carrhouse Lane and tarmac would introduce urban formality. The new bridge over the Etherow would truncate the openness of the river. The new junction with the A57 at Brookfield would allow traffic (currently well contained by the A57 hedge) to spill out into the countryside. All these elements would disrupt the slope's small scale landform and unity, and interrupt the perceptions of relative tranquillity<sup>251</sup>.

#### **Significance of effects on landscape**

4.7.18 We believe that the effects of the scheme on landscape have been underestimated. NH concludes (Ch.7 Tables 7.27 & 7.28; 7.9.14) that by year 15 none of the landscapes would experience significant adverse effects. Apart from NCA 51 and DPWF landscapes that lie within the National Park, these landscapes have '*medium sensitivity*' (Ch.7 Table 7.11 & 7.21<sup>252</sup>). The magnitude of change in our view is '*major adverse*' (Ch.7 Table 7.12), as there is large scale damage to existing landscape character, loss of essential elements and changed land form; and introduction of conspicuous uncharacteristic and permanent elements – dual and single carriageways with traffic, concrete underpasses, bridges and junctions, signs and lighting – that can be only partially mitigated, if at all – see our scoring

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<sup>250</sup> The photomontage from VP 7 (Figure 7.9v) shows Mottram Moor in its present configuration.

<sup>251</sup> Greater Manchester Landscape Character and Sensitivity Assessment, 2018, page 58-62

<sup>252</sup> Table 7.21 scores NCA 51 Dark Peak as of high sensitivity whereas it should be 'very high' as it covers a National Park

in Table below. The significance of the effect is therefore ‘*moderate/large*’ (Ch.7 Table 7.14) and significant.

LCA/LCT	Significance of effect Winter Yr 15		Explanation
	NH	CPRE	
<b>NCA 54 Manchester Pennine Fringe</b>	Slight beneficial	Moderate adverse	Discernible change to LCA from introduction dual/single carriageways; loss of agricultural land hedges & trees; no strengthening of access - PRoW are moved to accommodate the road; 50% land take is for vegetation which is inaccessible to public; substantially reduced tranquillity by moving large volumes of road traffic and lighting into open country
<b>Dark Peak LCA PDNPA</b>	Neutral	Slight adverse	Strong visibility between scheme and LCA, as recognised by relevant assessments; ribbon of lights at night and moving traffic
<b>Dark Peak Moorland Slopes and Cloughs LCT</b>	Neutral	Slight adverse	Strong visibility between scheme and LCT; introduces ribbon of lights and moving traffic
<b>Dark Peak Western Fringe Valley Pastures with Industry LCT</b>	Neutral	Moderate/large adverse	Introduces major road infrastructure, concrete underpasses, junctions, a bridge, large volumes of traffic unrelated to settlements, uncharacteristic cuttings and earth banks, lighting; destroys distinctive features and tranquillity;
<b>Dark Peak Western Fringe Riverside Meadows LCT; GM LCT Incised Urban Fringe Valleys</b>	Slight adverse	Moderate/large adverse	Introduces new bridge, junction, single carriageway road with volumes of traffic and lighting; destroys openness of river scene and tranquillity
<b>SLLCA 1 Harrop Edge; GM LCT Pennine Foothills (Dark Peak)</b>	Slight adverse	Moderate/large adverse	Introduces major road infrastructure carrying large volumes of traffic unrelated to settlements, cuttings and earth banks; concrete underpasses & bridge; destroys distinctive features – trees, wet scrub, brook environment, and tranquillity;
<b>SLLCA 8 Mottram Moor Pasture; GM LTC Open Moorlands and enclosed Uplands (Dark Peak)</b>	Slight adverse	Large adverse	Into an intricate secluded and tranquil landscape introduces major road infrastructure and traffic unrelated to settlement, concrete portal underpass, uncharacteristic deep cutting, lighting; distinctive features – land form, hedges, topography, remnant parkland - destroyed; setting harmed by major new junction on Mottram Moor
<b>SLLCA 4 Etherow Valley Pastures; GM LCT Pennine Foothills (Dark Peak)</b>	Slight adverse	Moderate/large adverse	Introduces major road infrastructure with large volumes of traffic unrelated to settlements major new junction, concrete portal to underpass, bridge, uncharacteristic earthworks and lighting; changes land form, destroys natural brook course woodland and tranquillity

4.7.19 All three pastures are pockets of relative tranquillity and remoteness with strong visual and character connections to the upland edge of Greater Manchester and the Pennines beyond. The landscape’s role here is as an immediate rural hinterland and

backdrop to the adjacent urban areas but it is also the setting to the Peak District National Park<sup>253</sup>.

### **Landscape effects on PDNP**

4.7.20 NH claims there are no direct effects on the PDNP. However, there would be a direct effect on its setting; and an indirect effect on the PDNP due to changes in traffic flows on its roads.

#### Setting

4.7.21 The landscapes described above are all part of the PDNP setting, on which we believe there would be a slight adverse impact. This is apparent when looking west out of the Park from elevated locations on Tintwistle Low Moor, Pike Naze, Shire Hill and descending the A57 Snake Pass. Equally the Dark Peak moorlands form a dramatic remote edge to Greater Manchester. This is strengthened by opportunities for access and enjoyment. Although the sense of inspiration and escapism is constrained by the intervening settlements of Glossop and Hollingworth there are extensive long-distance views from elevated vantage points on Harrop Edge, descending Mottram Moor, from Warhill and Mudd, to the Pennine Moors and the National Park.

4.7.22 These landscapes are remote from NCA 51 Dark Peak which covers the PDNP. Separated by the settlements of Glossop, Hadfield, Padfield and Broadbottom and the railway, they were not considered to fulfil the design criteria for the PDNP in 1950 or in 1965<sup>254</sup>. Nevertheless they retain intact areas of Dark Peak character and are considered crucial to the PDNP as its setting. All three LCA assessments (NCA 54; PDNPA DPWF; GMCA) draw on these strong connections with NCA 51.

*'There are strong physical and ecological links between this upland NCA and the adjacent lowlands, in particular through the rivers and streams which drain the upland plateau and provide water to major rivers and river systems and flood mitigation to urban areas<sup>255</sup>... A real characteristic feature of the NCA is the views towards (and from) the surrounding urban conurbations of in this case Manchester. The views into and out from the NCA provide a clear illustration of the way in which this NCA 'fits into' the surrounding countryside and directly links to nearby centres of population... This location, at the interface between two significant topographical regions, gives these fringe landscapes a unique character different from those further east within the Dark Peak and those further west'.*

4.7.23 The landscape's character connections with the Peak District National Park, which lies immediately adjacent to the east<sup>256</sup>, provide an important resource and transition between the more settled and urban areas associated with Manchester in the west and the Dark Peak in the east. It is important to *'Ensure any new development does not adversely affect the special qualities of the Peak District National Park, including its beautiful views, sense of tranquillity and dark night skies, and the vital benefits that flow beyond its boundary'*<sup>257</sup>.

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<sup>253</sup> Greater Manchester Landscape Character and Sensitivity Assessment, 2018, page 58-62

<sup>254</sup> PDNP, History Designation Series, Ray Woolmore, 2006 para 65 and map page 49

<sup>255</sup> NCA Profile: 51 Dark Peak

<sup>256</sup> Greater Manchester Landscape Character and Sensitivity Assessment, 2018, page 70-77

<sup>257</sup> Greater Manchester Landscape Character and Sensitivity Assessment, 2018, page 89

4.7.24 The setting of the PDNP is under particular pressure in this area. The River Etherow Valley between Tintwistle and Hadfield has been developed almost to the National Park boundary. Around Glossop, housing developments abut up to the boundary. These effects encroach on the Park's natural beauty. Any major development of the scale of the proposed scheme would further erode the role of the setting. This is a material consideration for the planning balance.

#### Indirect effects on PDNP landscape

4.7.25 Traffic would increase through the Park on the A628T, A57 Snake Pass, A6024 to Holmfirth and on the A624 to Hayfield. All these roads lie within NCA 51: Dark Peak. These landscapes have very high sensitivity. NH concludes there would be no significant indirect effects on the LCAs within the PDNP. We disagree. The first statutory purpose of the National Park is to conserve and enhance the natural beauty wildlife and cultural heritage of the Park. Increases in traffic would alter the aesthetic and perceptual aspects of landscape character. Here we address tranquillity.

4.7.26 NH has considered only traffic noise (ES Ch.7, 7.9.15; Table 7.29 where all LCAs have very 'high sensitivity') and not tranquillity, a much more complex element of landscape character than noise<sup>258</sup>. Road traffic increases of 10% produce a 0.1dB increase in noise. An increase of 40% in traffic (as on the Snake Pass) increases noise by only 2.2dB<sup>259</sup> but humans can discriminate a change of about 1dB so increased noise on the Snake Pass will be perceptible, as NH reports (ES Ch.11, 11.9.97 v2). PDNP landscapes are of international/national value (ES Ch.7, Table 7.9) and their susceptibility (ES Ch.7, Table 7.10) is high. Consequently their sensitivity is very high (ES Ch.7, Table 7.11). The magnitude of effect (change) on the landscape and tranquillity made by traffic would be minor. According to ES Ch.7, Table 7.14 the significance of minor change in a landscape of very high sensitivity is moderate/large and the effects would be material in the decision-making process (ES Ch.7, Table 7.13).

4.7.27 The Dark Peak is famed for its desolate and exposed tracts of moorland that stretch great distances and create a sense of remoteness<sup>260</sup>. These are largely inaccessible to motor traffic but both Woodhead and Snake Passes cross open moorland - the Woodhead crosses Thurlstone Moor and the Snake Pass crosses the Kinder/Bleaklow plateau. The road noise from traffic on all these roads already effects the natural beauty and tranquillity of the Park up to a mile distant onto open moorland<sup>261</sup>. An increase would further harm these nationally important landscapes and impair their tranquillity. In order to fulfil the two statutory purposes of the National Park the PDNPA's strategy for NCA 51 is to protect the remoteness, wildness, open character and tranquillity of the Dark Peak landscapes.

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<sup>258</sup> CPRE Tranquillity Maps [REDACTED]

<sup>259</sup> Speed and Road Traffic Noise, UK Noise Association, 2009 [REDACTED]

<sup>260</sup> Dark Peak, Landscape Strategy, PDNPA, 2009

<sup>261</sup> Peak District National Park, State of the Park Report 2000, p 40 Until recently the National Park was a complete tranquil area apart from Bakewell and Tideswell. By the late 1990s three roads with an excess of 10,000 vehicles per day within the Park, including the A628, reduced the tranquil area by 50%.

## TOWNSCAPE - THE BUILT ENVIRONMENT

### Existing

4.7.28 Approximately 446 properties line the trunk route through the villages of Mottram, Hollingworth and Tintwistle, and ~79 properties line Woolley Lane in Hollingworth. Many are terraced houses and some have front doors opening directly onto the pavement. Residents and pedestrians endure a degraded townscape due to noise, air pollution, damage to property, intimidation by traffic and difficulty crossing the road, congestion and long queues. The existing situation is wholly unsatisfactory. The heavy traffic is a physical insult to anyone waiting for a bus on Mottram Moor. You cannot hear yourself speak. Your senses are assaulted by juggernauts and their combustion engines, only feet away. Rat running by traffic seeking to avoid long queues on the trunk route occurs through Mottram, Broadbottom and Charlesworth. Glossop itself is congested by traffic and dominated by parked cars, particularly on residential streets. At present high traffic flows adversely influence the perception and character of the local roads and the townscapes.

### Effects of the scheme

4.7.29 The A57 Link Roads would further affect the setting of Mottram, Hollingworth and Glossop; the built environment of Mottram at Spout Green through demolition of buildings and the addition of the Mottram underpass and the Roe Cross Road bridge; and, due to the traffic changes it would generate, impact both positively and negatively on the quality of the built environment throughout all the settlements in the area.

4.7.30 As we have demonstrated above and in the Green Belt chapter, the distinct settlement pattern, open space features, topography and landscape character of Mottram and Hollingworth and the nature of their setting would be harmed, including the Mottram Conservation Area.

4.7.31 Detrunking measures would apply to the A57T between the M67 J4 and its junction with Back Moor. The detrunked section and Woolley Lane would benefit from redistribution of traffic and hence reduced noise, vibration, severance<sup>262</sup> and a reduced sense of road danger but only if the promised traffic calming is implemented, effective and stops rat running. At present these roads would remain open to through traffic. These benefits to the built environment would accrue directly to ~ 94 dwellings (21% of 446) of those fronting the trunk road between the M67 J4 roundabout and the eastern boundary of Tintwistle; and nearly all the dwellings on Woolley Lane – those at either of the lane would still experience trunk road traffic at the Gun Inn junction and increased traffic on Woolley Bridge Road.

### *Mottram*

4.7.32 The scheme would move the traffic from the front doors of those living on Hyde Road to their back gardens, and place it beside the homes of those adjacent to the portals of the underpass. Market Street and Stalybridge Road would experience increased traffic negatively effecting the Mottram Conservation Area. Back Moor would experience a 3% increase in traffic in the opening year with almost 11,000 vehicle daily. We therefore disagree with NH's assessment as to the effect on Old Mottram SLTCA 4 as '*beneficial*'. It should be assessed as '*neutral*'.

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<sup>262</sup> Transport Assessment Report 3.7.14

### *Spout Green*

4.7.33 The townscape of Spout Green would be impoverished by the demolition of Mottram Old Mill, considered of regional importance, cottages on Old Hall Lane, considered of local importance, and the loss of mature trees. All contribute to its distinctiveness. The land above the Mottram Underpass (130m long) is planned as a community space, unlit at night to encourage bats to use it as a dark corridor. It would largely be amenity grass with individual trees, a hedge above the eastern portal, woodland edges to north and south, and shrubs<sup>263</sup>. Its eastern and western edges would end abruptly above the portals, and tranquillity would be lost due to traffic on the dual carriageway.

4.7.34 NH describes these profound structural changes in the opening year of the scheme as '*substantial adverse*' but scores their significance as '*moderate adverse*' at year 1 and '*slight adverse*' at year 15<sup>264</sup>. This underplays the drastic change to Spout Green which would be permanently severed and adjacent to a heavily trafficked dual carriageway. As this is a major change which cannot be fully mitigated - and the new community space does not remove that effect - the effect at year 15 should be '*moderate adverse*'.

### *Mottram Moor*

4.7.35 The new junction on Mottram Moor would have a profound effect on the built environment. NH concludes that the new noticeable features within SLTCA 5 (Mottram Moor) - including the junction, realignment of Mottram Moor, earthworks (false cuttings), de-trunking measures along Mottram Moor, a new integrated public realm providing car parking for residential properties lighting signage, noise barriers, and vehicles and loss of existing highway bounding vegetation - would result in moderate changes to the existing character. This fails to understand the profound changes that this area would undergo and that it also effects the Etherow Valley Pastures SLLCA 4. NH scores the effects of the scheme as slight adverse in year 15. Whichever LCT is used the effect is at the very least moderate adverse.

### *Trunk Road East*

4.7.36 East of the new junction, traffic flows on Mottram Moor would decrease by 43% in 2025 to 16,650 AADT but heavy traffic would remain with more than 1,800 daily lorry movements. Wedneshough Green would experience slight benefit but traffic would still dominate the scene. Through Hollingworth and Tintwistle, the scheme would not ameliorate the traffic effects which would remain the same or could be worse due to traffic generation. There would be adverse effects on Tintwistle due to increases in traffic on the A628T, although NH considers there is no effect on the Tintwistle Conservation area<sup>265</sup>. The built environment, including the setting of 9 grade II listed buildings, along the A628T and A616T at Crowden, Flouch, Langsett and Midhopestones, and on the A628 nontrunk to and through Penistone, would be harmed by increased traffic flows. Langsett village is one of the gateways to the National Park and a Conservation Area. Increased severance would be experienced by all the communities living alongside the trunk route.

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<sup>263</sup> ES Introductory Ch 1-4 Figures 2.1-2.4, Figure 2.4 sheet 3/10

<sup>264</sup> ES Ch 7 Landscape Table 7.27 pp102-103 SLTCA 3

<sup>265</sup> ES Cultural Heritage Ch 6, 6.3.5, 6.5.4, 6.7.38 traffic increases yet in The Case for the Scheme traffic decreases enough to encourage walking and cycling



### *Other settlements*

4.7.37 With congestion worsening on the A57 through Brookfield drivers would continue to rat run through Simmondley, Charlesworth, Chisworth, and Broadbottom, and find new routes through Glossopdale's residential area, including through Hadfield Conservation Area<sup>266</sup>. There would therefore be minor adverse effects on all these townscapes. Traffic noise, as opposed to tranquillity, has a major influence on the experience of the aesthetics and perception of townscape.

### *Noise within the settlements*<sup>267</sup>

4.7.38 Noise from motorised traffic impacts on the townscape, the quality of life in residential areas and deters walking and cycling. Without the scheme road noise would change little in the area. With the scheme NH reports that for those living on bypassed roads - Mottram Moor A57T, Woolley Lane, Hyde Road and adjacent streets – there would be less noise (366 receptors); but road noise would worsen for 128 receptors - those living near to the new link roads (especially the Mottram underpass and Edge Lane) and near Woolley Bridge. The benefits of reduced noise tend to diminish by 2040, whilst those experiencing increased noise increase in number.

4.7.39 Within the vicinity of the scheme there are eight Noise Important Areas (NIAs)<sup>268</sup> shown on ES Figure 11.1. In four NIAs – 10094 Dinting Vale, 10993 Brookfield and 7247 and 1574 adjacent to the M67 – where traffic would increase, increasing road noise, significantly in NIAs 10093, 7247 and 1574. In four NIAs – 10992 Mottram Moor, Back Moor and Woolley Lane; 10991 and 1575 on Roe Cross Road; 13966 Mottram Road - traffic flows would decrease, reducing traffic noise substantially in NIA 10992. However these figures do not reveal the full effect of road noise in Longdendale.

4.7.40 At night, with or without the scheme, in 2025 the Hattersley, Mottram, and Hollingworth settlements experience road traffic noise above the lowest observed adverse effect level (LOAEL)<sup>269</sup>. This is the level (for day 55dB  $L_{A10,18hr}$  for night 40  $L_{night,outside}$ ) above which adverse effects on health and quality of life can be detected.

4.7.41 Day and night, with or without the scheme, in 2025<sup>270</sup> those living on Mottram Road near the M67 roundabout Junction 4, on Market Street and Broadbottom Road in Mottram, on the A628T through Hollingworth, and on Hadfield Road experience noise levels of significant observed adverse effect levels (SOAEL) or greater. This is the level (for day 68dB  $L_{A10,18hr}$  for night 55dB  $L_{night,outside}$ ) above which significant adverse effects on health and quality of life occur. As we are only given predicted road traffic noise levels at 71 selected locations out of the thousands assessed we do not know how many people are experiencing or would experience road traffic noise above LOAEL and SOAEL.

<sup>266</sup> [REDACTED]

<sup>268</sup> [REDACTED] NIAs highlight locations where the highest 1% of noise levels, created by road, rail and urban areas, at residential locations can be found

<sup>269</sup> ES Figure 11.15 Night DS

<sup>270</sup> ES Figure 11.7 Daytime DM; Figure 11.8 daytime DS; Figure 11.15 Night DS; Figures 11.7 and 11.8

4.7.42 It is estimated that the annual social cost of urban road noise (due to sleep disturbance, annoyance, heart attacks, strokes and dementia) in England is £7 billion to £10 billion. This places it at a similar magnitude of effect to road accidents (£9 billion)<sup>271</sup>.

#### **CONCLUSION OF EFFECTS ON LANDSCAPE AND TOWNSCAPE**

4.7.43 In summary the A57 Link Roads, three concrete underpasses, two bridges, new junctions, lighting, signage, embankments cuttings and false cutting, drainage features, fencing, access tracks, and vehicle movements would be a major irreversible negative effect on landscape, townscape and people's appreciation of both.

4.7.44 The scale and formality of the infrastructure and its associated planting would destroy the individual character of each of these pasture types of the Dark Peak Western Fringe. Their landscapes, subtly different in character, would be fragmented into pockets of land, contiguity lost. This fragmentation would be accentuated by the proposed landscaping. Each section of the scheme impacts on mature and diverse elements – the destruction of the unsettled watery scrub below Harrop Edge, the interruption of the smooth slope fall and tree belt of Mottram pasture with an unsightly cutting, the aesthetic of the woods and meadows on the River Etherow slopes, the channelling of streams through culverts and into ditches. Although there would be 6,000m of replacement hedges<sup>272</sup>, they would not replicate the lost field boundary pattern but follow the carriageways. At night there would be a ribbon of light extending urbanisation into the countryside. Traffic noise would remove local tranquillity.

4.7.45 The consultation document demonstrated the high value local communities have for their sense of place. None of these landscapes are rare but they are distinctive and representative of the Manchester Pennine Fringe NCA 51, DPWF LCTs and Greater Manchester's LCTs. Mitigation measures may partially landscape the new roads in short sections but this underplays the long term significance and the magnitude of effect of these major changes in land form and landscape. Although the proposed false cuttings with tree planting would be effective in partially screening vehicles on several prominent sections of the road, their very nature – as engineered bunds – would tend to accentuate the road's linear characteristics. They would not reduce the effects on tranquillity as noise will spill out in the countryside.

4.7.46 The scheme would create perceived changes to the boundaries of the settlements which at present are abrupt, leading to pockets of land which will be seen as opportune for development (see Chapter on Green Belt). None of these effects would be offset by the partial amelioration of congestion on the A57 Hyde Road and on Woolley Lane, leading to an overall deterioration in both the built and natural environment.

4.7.47 In reality the predicted effects are likely to be worse. A permanent deterioration in landscape quality has been shown by a detailed examination of three roads, the A27 Polegate Bypass, the A34 Newbury Bypass and the M65 Blackburn Southern Bypass<sup>273</sup>.

<sup>271</sup> [REDACTED] These costs underestimate the burden as the effects on productivity and the natural environment are not valued.

<sup>272</sup> 8.6.28-8.6.31 Thirty one hedgerows with a total length of 3,312m would be removed. The majority (77%) are intact but species poor.

<sup>273</sup> The End of the Road? *The Impact of Road Projects in England* Report for CPRE, 2017, Sloman et al  
[REDACTED]

Lighting and the increase in noise experienced in the countryside around these roads has combined to erode the tranquillity and rural feel of these areas.

## VISUAL EFFECT

4.7.48 In Year 1 there would be a corridor of tarmac with intermittent bare earth banks, lighting, signs, a plethora of tree protectors, post and rail fencing, concrete underpasses, attenuation ponds and drainage ditches and large volumes of noisy moving traffic, which would glint and catch the sunlight. At night traffic and road lighting would create a ribbon of light through the darkness distinct from the settlements.

4.7.49 By Year 15, if the environmental management plan comes to fruition, the earth banks would have grassed over, post and rail fence would have weathered to grey, shrub and tree planting would have grown, hedges would be developing and vegetation would have recovered around ponds, re-channelled streams and ditches.

4.7.50 NH has considered visual effect from a number of viewpoints, for receptors outdoors and for residents<sup>274</sup>.

## Photomontages

4.7.51 Photomontages from Viewpoints (VPs) all have public access. We have a number of issues with these as follows<sup>275</sup>.

4.7.52 VPs which could be better located to reveal the full effects of the scheme:

- VP2, a view from Edge Lane looking south towards Roe Cross Road but largely filtered by buildings and vegetation. A view further west on Edge Lane would give a more complete view, including of the western portal of the Mottram underpass.
- VP4, a selective view from Roe Cross Road looking north. This avoids the view looking west along the dual carriageway.
- VP6 provides a selective view from Coach Road which uses the topography to conceal a view of the eastern portal. A view from within the pasture would be more revealing – those using the new bridleway and drivers would see the eastern portal.
- VP8, a selective viewpoint from Warhill taking advantage of the topography to conceal sight of the new junction. A view further east and lower down the slope on the PRoW would show the landscape of the new junction, and more of the dual carriageway.

<sup>274</sup> Figure 7.8 – Visual Effects Drawing showing location of receptors

<sup>275</sup> Errors of labelling or direction occur on:

- Figure 7.5 showing the location of VPs in the PDNP but no direction for the views is given.
- Fig 7.9 ix Sheet 31/42 is labelled Trans-Pennine Trail (TPT) but appears to be a view from Arnfield Lane
- Fig 7.9xi – The photomontages for VPs 26 and 27 have been transposed. VP 26 described as from Pennine Bridleway on Lantern Pike. The GR fits (Table 7.32) but Sheet 41/42 photomontage carries a view of moorland and a signpost saying Snake Path. The photomontage for sheet 41 appears to have been taken where the Snake Path meets PRoW to Park Hall and centred on Middle Moor it appears to have ignored the axis of VP 27 WNW which is off-picture and shows around an axis to the North. This does not meet with the methodology of photomontages (see ES Ch 7 7.3.28) which requires 90° extension around the VP direction.
- Fig 7.9xi – VP 27 is described as view from Snake Path. But is a view from Lantern Pike. Hayfield has been labelled Little Hayfield. Little Hayfield is out of view. No views are shown north of Little Hayfield where there would be good views of the road from network of paths and road noise.

- VP9 is taken looking straight at the trees near to Carrhouse Farm. A VP further south beyond the trees or higher on the slope from LON/94/10 would have provided an open view of the River Etherow floodplain.

4.7.53 Photomontages that provide a view of only the existing landscape and do not provide photomontages for years 1 or 15 with the scheme

- VP2, a selective view from Edge Lane looking south towards Roe Cross Road.
- VP3, looking towards Harrop Edge near the M67 J4 roundabout (ES Figure 7.9 iii) avoids showing the full landscape effect of the scheme and provides a limited view of the western portal and its cutting.
- VP5, looking south along Old Hall Lane. *'Views represented by Viewpoint 5 would be more open, with visibility of the new underpass structure and the cutting slopes present at the eastern portal'* (ES Ch.7; 7.9.25) but there are no photomontages for years 1 or 15.
- VP7, looking east on Mottram Moor towards where the new junction would be. The fly through video for the 2020 statutory consultation gives a figurative presentation of the layout.
- VP 11, looking from Etherow-Goyt Valley way at the proposed location of the single carriageway and River Etherow crossing

4.7.54 VP 28 from Tintwistle Low has no photomontage. From Tintwistle Low the scheme would be visible crossing Mottram Pasture and Etherow Valley pasture, including at night. There is no photomontage across the top of the Mottram underpass, which is planned as a community space.

4.7.55 We believe the magnitude of change of the visual effect would be major according to Table 7.18 – the project, or part of it, with its high volume of traffic would become the dominant feature or focal point of the view in year 1 from VPs 1, 3 to 8, 9, 11, 12, 13, 14, 16 and 17. All these VPs are considered of high sensitivity except for VPs 3,8 and 11 which are considered of moderate sensitivity. According to Table 7.19 the significance of effect would be large or very large. We therefore disagree with the summary of the significant effects on the VPs for year 1 (Table 7.30<sup>276</sup> & Appendix 7.1 Table 1-2), and would score all of them *'large adverse'* except VPs 4 and 5 which we would score *'very large adverse'*. By year 15, the scores would reduce to *'moderate adverse'* except for VPs 4 and 5 which would be *'large adverse'*.

#### **Effect on users of PROW**

4.7.56 ES Ch.7, Table 7.34 lists only four viewpoints on PROW that would experience *'moderate adverse'* effects on visual amenity in 2040<sup>277</sup>. We believe this substantially underrepresents the effect.

4.7.57 PROW both in the vicinity of and more distant from the scheme particularly from the network of paths below Harrop Edge would have views of the open section of the dual carriageway ~400m in length (from chainage 100 to 500), its earth banks, its associated road furniture and its traffic. This would at the very least create a *'moderate adverse'*, not *'slight*

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<sup>276</sup> Appendix 7.1 Visual Effects Schedule, Table 1-2 Effects on receptors at representative/specific/illustrative VPs operational

<sup>277</sup> Chapter 16 Summary omits V-R-18 and downplays V-R-49 to a nonsignificant effect by 2040

adverse', effect for receptors V-P-01, V-P-01-1 and V-P021-5. From footpaths on Warhill the dual carriageway descending Mottram Moor Pasture – at least 250m of it -, the new junction, and sections of the single carriageway would be seen as it descended to Brookfield (receptor V-P-08). From Mudd where the vista of Longdendale is laid out traffic would be visible above the planted trees. From long distance trails, Pennine Bridleway Trans-Pennine Trail and Etherow-Goyt Valley Way the gap in planting for the bridge over the Etherow would expose moving and stationary traffic and open up views of Brookfield.

4.7.57 There would be adverse effects on people's enjoyment of the countryside on their doorstep. Traffic and the clutter of road signs, lights, environmental barriers would all blight the experience of Longdendale. One has only to step off Mottram Moor and its traffic noise and walk a short distance along the footpath climbing to Mottram past the site of the new junction to realise the devastating effect the scheme would have on the retreat that the local countryside provides. Several footpaths would be diverted through the concrete underpasses for Old Mill Farm and Carrhouse Farm, giving an alien urban experience. The walls are likely to become vandalised with graffiti.

4.7.58 Users of the new bridleway adjacent to the westbound single carriageway only would be segregated from, but still adjacent to intimidating, polluting and noisy traffic. This effect would be pronounced as users continued on the bridleway to Old Hall Lane along the top of the cutting, with the roar of traffic rising from the dual carriageway below and a short section screened by a noise barrier.

4.7.59 From seventeen viewpoints on the above PRow and those further afield, there would be moderate to large adverse effects in the opening year, which NH believes would reduce as vegetation grows. The effects of this major road infrastructure cannot be reduced to a satisfactory degree by vegetation.

4.7.60 From Melandra both the A57 Link Road and the more distant Mottram Moor Link Road as it descends from the eastern portal of the Mottram underpass would be visible (VP 16 Figure 7.9ix). Although views on lower ground would be filtered through trees (VP 9 Figure 7.9vi) higher up the slope the new road and its traffic would be seen from LON/94/10.

4.7.61 Visual amenity would be severely harmed on Roe Cross Road and the community space. From the new bridge and above both portals on the Mottram underpass one would look into deep cuttings as the road and its traffic entered and exited the underpass. The new junction on Mottram Moor out of scale and keeping with its location would dominate the scene, with the added intrusion of large volumes of queuing and moving traffic producing visual disturbance. Although slightly less busy the Brookfield junction on the A57 would produce similar impacts and accentuate urbanisation. Traffic increases substantially on Markey Street in Mottram and receptors V-T-03-1 and V-T-04-2 should score 'slight adverse', not 'slight beneficial'.

4.7.62 The scheme would intrude on views from the settlements - from Church Brow within the Conservation Area there would be glimpses of the dual and single carriageways; from

Mottram of the new junction and dual carriageway; and from Brookfield when looking straight up the new single carriageway.

### Effects on Residents

4.7.63 Table 7.34 lists seven residential receptors that would experience 'moderate adverse' effects on visual amenity in 2040 - residents living near the portals of the Mottram underpass on Old Road and Old Hall Lane; and at Grade II listed Tara Brook Farm. From the latter open rural views towards Mudd would be interrupted by the new road with a noise/mammal barrier. To these should be added receptors on Edge Lane, from where there would be clear views of the open section of the dual carriageway, with its moving traffic (V-R-03; V-R-04). Those living on Hyde Road would have close range views of the traffic filtered through trees, but longer range views of the open section of the bypass and the Old Hall Farm underpass (receptor V-R-26). From Mottram Moor there would be a close view filtered through trees of the dual carriageway, the new junction and queuing traffic. Properties along Coach Road would have views of the new cutting with its rocky banks and the eastern tunnel portal. From Brookfield residents (receptors V-R-50 and V-R-53) would look onto the new junction and straight up the new single carriageway. In our view significant, not slight adverse, effects remain at year 15.

### Effect on Peak District National Park

4.7.64 Through the PDNP, traffic would increase by 7% on the A628T through Longdendale and by 38% on the A57 Snake Pass. The Pennine Way is crossed by both roads and the Trans-Pennine Trail, which lies on the opposite side of Longdendale to the road for much of its way, is crossed by the A628T. The Longdendale Trail east of Woodhead reservoir lies beside the A628T. Both roads cross significant areas of open access land. The value of views (ES Ch.7 Table 7.15) to/from the Park, fulfil the criteria for high value (ES Ch.7 Table 7.15), high receptor susceptibility (ES Ch.7 Table 7.16) and very high visual sensitivity (ES Ch.7 Table 7.17). The magnitude of change is greater than negligible on the Snake Pass and the A628T, as the impact would be close to and would alter the balance of features and elements that comprise the existing view (ES Ch.7 Table 7.18 and 7.19). Hence the significance of the effect is 'moderate.' In the National Park increased traffic would be intimidating when attempting to cross the A628T or A57 (both these two roads take the bulk of the accident increases), or when walking beside these roads to link up with footpaths, or when using open access land. This would be to the detriment of the experience of wildness, scenic beauty, and tranquillity the Park offers. A 'slight adverse' effect would apply to the assessment of visual effects at representative viewpoints as detailed in ES Ch.7 Figure 7.5. Amenity for people using the national trails or exploring open access land at a distance from the roads, e.g. from Bamford and Derwent Edges; on the slopes of Bleaklow and Black Hill, would be impaired by visual intrusions.

### Conclusion

4.7.65 This major road proposal and its traffic would dominate the local countryside and the villages, and severely harm the landscape character and distinctiveness, tranquillity, townscape, visual amenity, and the National Park and its setting. In order to create a utility, a highway for cars and lorries that is safe – the design is limited to trying to conceal it and its concrete underpasses. The scheme has been treated as a self-contained corridor for tarmac,

bunds and planting. Far from ‘stitching its scheme into the landscape<sup>278</sup>’ the design splits the countryside into pockets. Consequently it is contrary to a suite of national, regional and local policies. NPSNN is more concerned with directing the outputs that applicants should achieve rather than the outcomes for landscape but it requires good design (NPSNN 1.20).

4.7.66 The Design Principles for National Infrastructure<sup>279</sup> are therefore a relevant consideration but NH makes no mention of them. The principles require the applicant to ‘*appreciate the wider context, engage meaningfully, and continually measure and improve.*’ There was no meaningful engagement. The consultation to determine the preferred route was conducted around a line on a map. The 2020 statutory consultation was a travesty and so devoid of information that three local authorities submitted holding objections. We have documented this in Appendix C. All this falls well short of the expectations of NH described in the foreword to its licence.

*‘The design principles are*

- *Climate - Mitigate greenhouse gas emissions and adapt to climate change*
- *People - Reflect what society wants and share benefits widely*
- *Places - Provide a sense of identity and improve our environment*
- *Value - Achieve multiple benefits and solve problems well’.*

4.7.67 The scheme fails against all these design principles – it increases climate emissions; it is not what local people want – they want a solution for all 3 villages and protection of the National Park. It does not improve travel for those without access to a car; sticking a bridleway<sup>280</sup> on one side of the single carriageway (both directions on one track on a gradient) to connect to Old Hall Lane is a recipe for collisions between pedestrians and cyclists, and between cyclists travelling in opposite directions. Traffic would overwhelm local identity. The hundred-year-old Mottram show ground would be lost and farm holdings severed. Nature, formalised into trees on false banks and around SUDS, would be forced to adapt to lights, noise and moving vehicles. The Link Roads do not solve the problem or achieve multiple benefits – they merely move the problem elsewhere. These arguments apply equally to the requirements of the National Design Guide 2021.

4.7.68 The applicant’s assessment is also required to take account of any relevant policies in local development documents in England (NPS NN 5.144). These include NPPF 2021, PDNPA Core Strategy, Greater Manchester’s emerging joint development plan ‘Places for Everyone’, TMBC UDP saved policies 2007 and HPBC Local Plan 2016. These provide a more robust framework than NPSNN against which to assess the landscape and visual effects.

4.7.69 The scheme would not protect or enhance valued landscapes, and has not recognised the intrinsic character and beauty of the countryside (NPPF 174). Although opportunities have been taken to incorporate trees into the development (NPPF 131; NPSNN 5.36), the standard architecture and design of the strategic road network and its traffic would be a major uncharacteristic, unsympathetic intrusion which harms the landscape and the sense of place (NPPF 130). Almost 50% of the land taken is unrelated to the utility of the highway

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<sup>278</sup> Consultation Report 5.1 Appendix Y pp22/25/etc

<sup>279</sup> [REDACTED]

<sup>280</sup> Draft DCO Schedule 1 Work No. 14 deadline 1 draft

but would be inaccessible to the public, contrary to Greater Manchester's Joint Plan Policy JP-G 7 Trees and Woodland. It would not reduce noise to a minimum, or protect tranquillity ( a resource that is particularly sought in the countryside) and dark landscapes, despite low level lighting (NPSNN 5.87; NNPF 185b).

4.7.70 NH has grossly underestimated the effects on visual amenity which would be significantly impaired by the infrastructure and its traffic for those enjoying the outdoors and residents. Traffic currently contained, would spill out across green fields, with flashes of moving vehicles repeatedly catching the eye. The overwhelming impact of road traffic noise is not fully expressed by tranquillity mapping, which gives a quantitative assessment but does not give the human perspective. A qualitative study of individual experiences<sup>281</sup> showed that road traffic noise created significant disturbance at some distance in the open countryside to the extent that some felt it was no longer worth visiting.

4.7.71 The open character and tranquillity of the Etherow valley is key to local identity, quality of life and the natural environment. The river would be permanently reduced and disturbed by a bridge, the new road and 21,000 vehicles per day. This is contrary to Greater Manchester's joint plan 'Places for Everyone', which requires development to '*reflect and respect the special qualities and key landscape characteristics of its location*' (Policy JP-G 1 Valuing Important landscapes<sup>282</sup>); protect and improve the remaining open character of river valleys avoiding their fragmentation and prominent development on valley edges (JP-G 3) and retaining existing pockets of relative tranquillity and seclusion.

4.7.72 The majority of the scheme lies within Tameside where it would be contrary to all TMBC policies that conserve and enhance Landscape Quality and Character.

- Policy OL10 seeks '*to re-establish a countryside character where necessary in the river valleys and other areas of the urban fringe. Within the countryside, river valley and urban fringe areas, any development will be required to be sympathetic to its surroundings and high standards of siting, design, materials and landscaping will be expected. Especially careful consideration will be given to the appearance of developments within open land in the eastern, upland part of the Borough*'.
- Policy OL15 (Openness and Appearance of River Valleys) does '*not permit developments which would adversely affect the character of the Tame, Medlock and Etherow river valleys including their value for nature conservation, or the overall improvement of their appearance, or break the open parts of the valleys into further sections.*'
- OL16 does '*not permit development that would adversely affect the purposes of the Peak District National Park or be harmful to its valued characteristics... Careful control needs to be exercised over harmful development, whether inside the National Park or not*'.
- C1 Townscape and Urban Form expects '*the distinct settlement pattern, open space features, topography, townscape and landscape character of specific areas of the Borough to be understood, and the nature of the surrounding fabric to be respected. The relationship between buildings and their setting should be given particular attention in the design of any proposal for development*'.

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<sup>281</sup> Traffic Noise in Rural Areas – personal experiences of people affected, Transport for Quality of Life, 2008

<sup>282</sup> Places for Everyone Aug 2021 para 8.3



- The Borough's Conservation Areas (Policy C2)... will be preserved or enhanced through the control of development, the promotion of improvement measures, or both. *There is widespread recognition of the importance of preserving and enhancing groups of buildings and areas of towns and villages which have a special architectural, historic, traditional or other distinctive or rare character or setting to them.*
- Policy OL5 protects amenity spaces such as the Mottram Showground.

4.7.73 The impacts of the scheme on the National Park and its setting have been significantly underestimated. All of the national, regional and local policies reflect the strong protection given to the National Park, as required by its statutory purposes<sup>283</sup>, and recognise the importance of the National Park setting.

*'Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm<sup>284</sup>. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.'*

*'Care must be taken to ensure that all development respects and enhances the high quality environment of the area, including the setting of the National Park... The valued characteristics include the flow of landscape character across and beyond the National Park boundary; which provides a continuity of landscape and valued setting for the National Park. This is a special value attached to the National Park by surrounding urban communities<sup>285</sup>.'*

Within the National Park the scheme is contrary to the statutory purposes as it does not *'conserve and enhance landscape character, natural beauty, wildlife, cultural heritage and valued characteristics<sup>286</sup>'* Traffic impacts, such as this scheme generates, are unacceptable - *'Transport developments which increase the amount of cross-Park traffic or have other adverse effects on its setting and character, amenity and enjoyment will be opposed<sup>287</sup>.'*

4.7.74 Taken altogether the impacts of the scheme weigh heavily against it in the planning balance.

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<sup>283</sup> NPPF 2021 176; TMBC UDP Policy OL 16; HPBC Local Plan S2 and EQ2; Environment Act 1995:

(i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the national parks; and  
(ii) to promote opportunities for the understanding and enjoyment of the special qualities [of the parks] by the public.

<sup>284</sup> [REDACTED]  
<sup>285</sup> PDNPA Core Strat 3.31; Policy GSP 2 and GSP 4

<sup>286</sup> PDNPA Core Strategy L1 Landscape and Conservation

<sup>287</sup> PDNPA Core Strategy Policy T2 Reducing and redirecting traffic A

#### 4.8 EFFECTS ON THE PEAK DISTRICT NATIONAL PARK (PDNP)

4.8.1 As we believe there would be significant adverse effects on the PDNP we have brought all those effects together below.

4.8.2 The scheme lies 2Km distant from the PDNP boundary but within the setting of the Park. Impacts would arise on the national park setting from the new infrastructure and its traffic. Increased traffic flows would impact on national park landscapes and visual receptors, and on Tintwistle and Langsett Conservation Areas, and listed buildings along the route.

4.8.3 The nationally important designation of a National Park confers the highest status of protection for landscape and scenic beauty<sup>288</sup>. The statutory purposes of National Parks<sup>289</sup> are:

- (iii) to conserve and **enhance** the natural beauty, wildlife and cultural heritage of the National Parks (our emphasis); and
- (iv) to promote opportunities for the understanding and enjoyment of the special qualities [of the Parks] by the public.

4.8.4 The Government takes National Park purposes extremely seriously. Section 62 of the Environment Act 1995 places a general duty on statutory undertakers, such as the Secretary of State, National Highways and Local Councils, to have regard to the purposes of National Parks when coming to decisions or carrying out their activities relating to or affecting land within the Parks.

4.8.5 The legislation is followed through in policies at the national (NPPF, NPSNN, UK National Park circular), regional (Greater Manchester Joint Plan) and local level (PDNPA Core Strategy and Development Management Policies; Tameside MBC UDP adopted Nov 2004<sup>290</sup>; High Peak Borough Council Local Plan adopted 2016).

4.8.6 Increasing trunk road traffic through the Peak Park is contrary to NPSNN 5.152, the English National Parks and Broads UK Government Visions and Circular, and the PDNPA Core Strategy policies T1 and T2. National Highways' proposal is in breach of all these policies. Increasing traffic and its noise and decreasing tranquillity does not conserve and enhance the National Park, nor increase enjoyment of its special qualities. NH uses the already degraded environment along the trans-Pennine routes to argue for their continuing erosion. By underscoring the effects of the scheme on the PDNP NH has failed to reflect its high sensitivity to change. This implies that NH has not had the necessary regard to the duty imposed on it and, if the Secretary of State accepts NH's assessment, he too will have failed to fulfil that duty.

4.8.7 The impacts of the scheme once operational on the PDNP would be as follows and are significantly adverse.

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<sup>288</sup> NPPF 2021 para 176

<sup>289</sup> Environment Act 1995, Section 61

<sup>290</sup> TMBC UDP Adopted 2004 OL16 The Council will not permit development that would adversely affect the purposes of the PDNP or be harmful to its valued characteristics.

### More traffic

4.8.8 Traffic flows on trans-Pennine routes increase by between 7% on the A628T and by 38% on the A57 Snake Pass (see table below). Traffic reroutes off the M62 but no details are provided.

### More road accidents

4.8.9 Traffic increases are accompanied by increases in traffic accidents: 102 collisions with 190 casualties, some of which would occur on the A628T corridor. However on the Snake Pass, which is already a medium-high risk road for a fatal or serious injury crash<sup>291</sup>, there are 160 extra collisions over 60 years. Although no measures are proposed to address this they could have adverse impacts on both landscape and amenity within the Park.

### More carbon emissions

4.8.10 Over a 60 year period the scheme would add an extra 429,997tCO<sub>2</sub>e over 60 yrs which would impact directly on the National Park's landscapes. National Parks England's vision for all the Parks aims for a rapid escalation in tackling the climate emergency in order to achieve net zero in National Parks<sup>292</sup>. To contribute to this the PDNPA's emerging '*spatial strategy will continue to advocate the need to reduce the need to travel by private car, foster a move a low carbon travel, and seek stronger contributions from new development to nature recovery*'<sup>293</sup>. With respect to transport its PDNP Management Plan<sup>294</sup> intends to reduce the effects of climate change on the special qualities by creating a '*low carbon sustainable transport offer for all which supports and encourages a new sustainable travel hierarchy promoting:*

- *Active travel encouraging low carbon and active transport such as walking and cycling allowing enjoyment of the National Park's special qualities.*
- *Sustainable public transport encouraging mass transit and shared travel to and within the National Park.*
- *Low emission car based travel through greater opportunities for electrically charged vehicles. Promoted by integrated and promotional ticketing'.*

NH does not contribute to these aims and threatens the achievement of these aspirations by increasing traffic carbon emissions during the climate emergency.

### Impacts on Landscape

4.8.11 The setting of the Park in Longdendale lies within NCA 54 Manchester Pennine Fringe. It has a natural, green, undeveloped character, with beautiful, open views of countryside, the farmland, fields and meadows; peace and tranquillity; plentiful and diverse wildlife; green, rolling hills; and the moors, including Hobson Moor and Mottram Moor. There is easy access to the countryside and to the Park on footpaths and bridleways.

4.8.12 The scheme with all its new structures and traffic would introduce uncharacteristic new features into this setting including false cuttings, vehicular movements, signage and

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<sup>291</sup> British EuroRAP Crash Risk Mapping Results 2021, EuroRAP

<sup>292</sup> [REDACTED]

National Parks England's Delivery Plan for Climate Leadership in National Parks (2020)

<sup>293</sup> National Parks England's Delivery Plan for Climate Leadership in National Parks (2020), Item 6 Programmes and Resources Meeting – 1st October 2021

<sup>294</sup> Peak District National Park Management Plan 2018-2023 – Delivery Plan

night time lighting. Coupled with these would be the loss of existing features including hedgerows and woodland groups, together with agricultural fields. NH concludes there would be a slight 'beneficial' effect on NCA 54 due to expansion of green infrastructure. We conclude the effect would be slight adverse.

4.8.13 Effects on national park landscape character and its special qualities were considered neutral<sup>295</sup>. Three viewpoints (VPs 15,18, 28), 2 near Tintwistle and one from the trans-Pennine Trail below Padfield<sup>296</sup> all have a view of the scheme from a distance of 2km. However from Tintwistle Low Moor and Pikenaze Moor the Link Roads would be visible and stand out at night, increasing light pollution and reducing tranquillity.

4.8.14 ES Ch. 7 Table 7.29 summarises the magnitude of change on landscape character within the PDNP from traffic flow changes and concludes its significance would be 'slight adverse' as changes would not be perceptible from the baseline condition. We disagree as the impact on tranquillity would be discernible where the A628T and the A57 pass through open access land or where national trails cross the road, and therefore of 'moderate' significance.

4.8.15 Five viewpoints<sup>297</sup> alongside the A628T (VPs 19, 20, 21, 24, 25), two at the summit of the A57 Snake Pass where the Pennine Way crosses (VPs 22, 23) and two beside the A624 (VPs 26, 27) to Hayfield were chosen for visual effects. As all three roads '*currently detract from the special qualities of tranquillity and wildness*', it was concluded that the experience of the special qualities<sup>298</sup> of the Park at these 9 VPs would be unchanged by the traffic flow changes. We disagree. The impact on more distant views of these roads would be slight adverse but those exploring open access land near to the roads, walking or cycling the roads or using the national trails would experience perceptible visual impacts that would be of moderate significance.

4.8.16 The impact of the slight increases in traffic on the A628T through Tintwistle Conservation Area '*would not result in any perceptible change to the character, appearance or noise environment of the conservation area*'<sup>299</sup>. (The Case for the Scheme para 7.8.5 claims '*The Scheme is expected to lead to a reduction in traffic within Mottram in Longdendale, Hollingworth and Tintwistle, which may increase walking and cycling in these localities*'. Our emphasis). The traffic flows should be made explicit.

4.8.17 Effects on Langsett Conservation Area are not addressed but should be.

### **Effect on air quality**

4.8.18 The study area includes the Air Quality Management Areas (AQMA) along the M60 Junction 24, M67, A57T and A628T in Hollingworth but ends before it reaches the Tintwistle AQMA. Through Tintwistle and east on the A628T increases in traffic do not meet the criteria of 1,000 AADT increase to trigger the inclusion of the road in the air quality study. However we are not given traffic flows through Tintwistle. Increases on the A57 Snake Pass are greater than 1,000 AADT and the air quality study extends along its length to

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<sup>295</sup> ES Ch.7 Table 7.27 Effects on Landscape and Townscape Character Areas (Operation)

<sup>296</sup> In ES Ch.7 Appendix 7.1 Visual Effects Schedule, Table 1-2 Effects on Receptors at Representative/ Specific/ and Illustrative Viewpoints (Operational). Impacts in summer, not winter, 2040 are given, as the '*tree blocks are extensive enough to provide continuing screening*'.

<sup>297</sup> ES Ch. 7 Figure 7.5. Indirect Representative viewpoints within the PDNP

<sup>298</sup> ES Ch.7 Table 7.32 Indirect Visual Effects on Representative Viewpoints within the PDNP

<sup>299</sup> ES Ch.6 Cultural Heritage 6.7.38

Ladybower. No exceedances were found in modelled NO<sub>2</sub> levels. The impact on Tintwistle AQMA should be made explicit.

### **Increased Noise and Reduced Tranquillity**

4.8.19 Without the scheme road noise would change little. Within the PDNP only the A57 Snake Pass was modelled for road noise because of the traffic increases.

4.8.20 The modelled increase in traffic flows on the A628T through the Park are not predicted to cause a perceptible change in noise level in the short or long-term; impacts on the Trans Pennine Trail and the Pennine Way would be negligible<sup>300</sup>. Road noise on the A57 Snake Pass would increase perceptibly in the short-term but by 2040 would have a negligible impact (not sure why as traffic increase is maintained, the benefits of reduced noise tend to diminish by 2040 and those experiencing increased noise increase in number). *'The impact would be limited to within approximately 10 m of the road'*. We disagree with this assertion. Noise can be heard more than a mile north from the A628T in the Crowden valley and from the A57 when walking or climbing. Additional traffic would extend the impact and reduce tranquillity (as discussed above).

### **Wildlife Impacts**

4.8.21 The Scheme would not result in the direct loss of any habitats in the Park. The boundary of the Dark Peak SSSI, the Peak District Moors (South Pennine Moors Phase 1) SPA, and the South Pennine Moors SAC lie approximately 2.2 km north-east, but within 200 m of the affected road network (A628T, A57, A624, A6024).

4.8.22 However, the eastern half of the Scheme is situated within the Dark Peak SAC, SPA and SSSI Impact Risk Zones for infrastructure projects that could cause changes in air pollution (ES Ch 8 8.6.7). Traffic modelling concluded there are no exceedances of the DMRB LA 105 N deposition screening criteria for the SPA, SAC and SSSI; therefore, the changes are not significant at all national sites within the study area<sup>301</sup>. However traffic flows increase with time and in 2040 on the A628 the increase would meet with the criteria for further assessment.

4.8.23 The ecological zone of influence (EZoI) was limited to 2km from the scheme for most species and 200m from the affected road network for air quality purposes. Therefore, issues of road kill on e.g. mountain hares have not been considered. For notable birds the EZoI is 5km. This should have captured all the species protected by the SPA and SCA but *'non-breeding waders including curlew and lapwing recorded during the breeding bird surveys were scoped out of the assessment'*.

### **Alternatives not rigorously assessed**

4.8.24 Highways England has failed to scrutinise alternatives that would avoid all the adverse impacts the Link Roads would impose the PDNP. Detrunking of the A628T corridor with a Park-wide control system on through traffic of heavy lorries, substantial improvements for safe walking and cycling, and for buses throughout Glossopdale and Longendale would reduce traffic and carbon emissions and allow people to travel without

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<sup>300</sup> ES Ch 7 7.3.31-7.3.47, 7.9.16

<sup>301</sup> ES Ch 8 Table 8-13

needing a car. The HGV control system scored well in the 2015 Feasibility Study of Trans-Pennine Routes but was not progressed as it was *'deemed undeliverable'*.

### **Threats of extension of road building in/through the National Park**

4.8.25 The two elements contingent on this scheme are climbing lanes and the Hollingworth-Tintwistle bypass.

#### ***Climbing Lanes***

4.8.26 Following the 2015 Feasibility Study of Trans-Pennine Routes the proposed Trans-Pennine route enhancements included a new Mottram Moor link road, a link road between the A57 and A57 trunk road, climbing lanes on the A628 between Woodhead Bridge and Salters Brook Bridge and dualling of the A61. The last two elements were removed from the scope of the Scheme<sup>302</sup>. *'Climbing lanes... were not progressed because assessments demonstrated that the existing A61 could accommodate the traffic levels expected over the next 20 years, especially with the development of Westwood roundabout which was previously responsible for much of the congestion. The negative environmental impact of these climbing lanes associated with construction in the national park was also highlighted'*<sup>303</sup>... *'The development of 'A628 Climbing Lanes' and 'A61 Dualling' proposals have been postponed until a later date, to allow further consideration of the associated benefits'*<sup>304</sup>.

#### ***Hollingworth-Tintwistle Bypass***

4.8.27 Through the consultation the PDNPA expressed concern that the scheme would increase pressure for a further bypass around Hollingworth and Tintwistle, necessitating road building within the PDNP<sup>305</sup>. These concerns appear reasonable.

4.8.28 The traffic conditions through Hollingworth and Tintwistle remain of serious concern to local people, have been raised at each consultation in 2017<sup>306</sup>, 2018 and 2020 and are reflected in support for a bypass around the two villages. A key concern raised during the 2018 consultation<sup>307</sup>, that Highways England declared it *'is unable to resolve'*<sup>308</sup>, was that Hollingworth and Tintwistle are not part of the solution. *'The current proposed scheme would introduce measures to alleviate the issues currently being encountered in the Mottram area. Additional studies have been highlighted by Transport for the North to enhance the future connectivity between Manchester and Sheffield that will look to address the issue in the adjacent villages. There is no commitment to any other scheme at this time. An update to the Roads Investment Strategy RIS is expected early 2020'*.

4.8.29 In the Consultation Report on the 2020 consultation NH explains that *'studies into the Mottram Hollingworth and Tintwistle bypass were carried out over a number of years but this bypass was widely opposed during public consultation and not taken forward. The Trans-Pennine Routes Feasibility Study, published by The Department for Transport in 2015 showed that the most critical issues were in the area of Mottram, which the A57 Link Roads*

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<sup>302</sup> ES Ch1-4 Introduction Table 1-3

<sup>303</sup> ES Ch1-4 Introduction 3.4.5

<sup>304</sup> The Case for the Scheme 2.1.10

<sup>305</sup> Consultation Report Table 8-33 Summary of Responses Received from Local Authorities (s42(1)(b)) page 214

<sup>306</sup> Trans Pennine Upgrade Programme Non statutory Consultation Report Oct 2017 4.10.3

<sup>307</sup> Trans Pennine Upgrade Report 2018 4.2.1

<sup>308</sup> Trans Pennine Upgrade Report 2018 4.2.1

*Scheme aims to address. The Applicant is still exploring the feasibility of the Hollingworth-Tintwistle bypass but no formal commitment to this currently exists and any proposals would need specific transport and environmental assessments'. In response to Tintwistle Parish Council's concerns about the impact of the scheme, NH 'explained that there is an acknowledgement of the issue and that whilst a Tintwistle bypass does not form part of its programme, the Trans Pennine strategic study and resulting options are currently with government for a decision on next steps'.*

4.8.30 However, the Hollingworth-Tintwistle bypass appears frequently in policy documents. It is identified in the Sheffield City Region Mayoral Combined Authority's Roads Implementation Plan to be delivered between 2019 and 2024; in Greater Manchester's Transport Strategy 2040 as an intervention by 2025 to alleviate the issues at Hollingworth and Tintwistle; in Transport for the North's Investment Programme Table 3 as at Project Control Framework Stage 1 and a specific intervention before 2027; as a protected route to the boundary with Derbyshire in the Tameside MBC UDP 2004 (saved 2007). The Hollingworth-Tintwistle bypass therefore appears to fulfil the criteria for consideration as it is a Tier 3C scheme as defined in PINS advice Note 17 on Cumulative Impacts Assessment, version 2, 2019 but it does not appear in ES Ch.15 Cumulative Effects.

**A57 Link Roads Traffic flow changes within the PDNP – ES Appendix 2.1 Traffic Data**

	B6105 Woodhead Rd		A628T Crowden		A628T Woodhead Reservoir		A628T Salters Bridge		A6024 to Holmfirth		A57 Snake Pass		A624 to Hayfield	
	AADT	HGV %	AADT	HGV %	AADT	HGV %	AADT	HGV %	AADT	HGV %	AADT	HGV %	AADT	HGV %
2025														
DM	2400	5%	10,700	15%	13100	13%	12400	14%	700	0%	3050	1%	9650	3%
DS	2350	5%	11,650	14%	14000	13%	13250	13%	800	0%	4200	1%	9550	4%
Change	-650		+950		+900		+650		+100		+1150		-100	
2040														
DM	3650	5%	11,100	13%	14700	11%	13800	12%	900	0%	3850	1%	12450	3%
DS	3,450	4%	12,200	13%	15650	11%	14700	12%	950	0%	5300	1%	11850	4%
change	-200		+1100		+950		+900		+50		+1450		-600	

Traffic flows through Tintwistle village are not given



## 4.9 CUMULATIVE EFFECTS

### Context

4.9. Schedule 4, paragraph 5 of the EIA Regulations states that an ES should include:

*A description of the likely significant effects of the development on the environment, resulting from inter alia... ..(e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources<sup>309</sup>...*

*The description of the likely significant effects on the factors specified in regulation 5(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development.*

4.9. The EIA Guidance<sup>310</sup> clarifies cumulative effects can arise from can arise from the interaction between all of the different projects in the same area; and the interaction between the various impacts within a single project.

Paragraph 4.15 of the NPSNN states that *'All proposals for projects that are subject to the European Union's Environmental Impact Assessment Directive and are likely to have significant effects on the environment, must be accompanied by an environmental statement, describing the aspects of the environment likely to be significantly affected by the project'*.

Paragraph 4.16 deals with significant cumulative effects and advises that *'any environmental statement should provide information on how the effects of the Applicant's proposal would combine and interact with the effects of other existing or consented development.'*

4.9. PINS advice Note 17 on Cumulative Impacts Assessment, version 2, 2019 provides the criteria for developments to be considered.

### Carbon emissions

4.9. In ES Ch.14 Climate effects Table 14.3 Legislation, regulatory and policy framework there is no recognition of the requirement to determine cumulative effects. Paragraph 14.3.15 states *'Operational emissions for the Do-Something scenario are compared with emissions from the baseline Do-Minimum scenario to give a magnitude of impact, for the Opening Year, Design Year and cumulative over the 60-year operational period as defined in the appraisal'*. The words in red are amendments made by NH to the original document submitted for the DCO. It is not clear what *'cumulative'* means in this sentence. There is no appraisal within the DCO documents in which *'cumulative over the 60-year period'*, is defined. The TPU Stage 3 Combined Modelling and Appraisal Report supplied to us by NH does not address cumulative effects – the word cumulative does not appear in it.

4.9. The cumulative effects of climate change are dismissed in two sentences by NH in Ch.14. *'Climate change is itself a cumulative effect in that it is the effect of GHG emissions worldwide, over time, on a single receptor. This assessment puts the Scheme in a wider*

<sup>309</sup> [REDACTED] Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, Sch 4 para 5

<sup>310</sup> [REDACTED]

context by comparing against the UK's Carbon Budgets<sup>311</sup>. ES Ch. 15, 15.4.8 only addresses the cumulative effects of the vulnerability of the scheme (adaptation to climate change) and is emphatic that climate effects have *'reported no residual significant effects during construction and operation and therefore are not considered to result in single project cumulative effects with other environmental topics'*. Thus inter-project and intra-project cumulative effects have been omitted for both mitigation and adaptation to climate change.

4.9. We agree that the effect of GHG is cumulative. The catastrophic effects of climate change can only be avoided by limiting our total GHG emissions between now and 2050 because of the longevity of carbon emissions in the atmosphere. Climate models show a strong relationship between cumulative CO<sub>2</sub> emissions and temperature rise. What matters is the amount of CO<sub>2</sub> that is emitted in every year between now and 2050, not just the amount emitted in the final year, which is why it is crucial to stop adding to it. This cumulative effect is well shown in TfN's Decarbonisation Strategy, Figure 19. To see the real effects of carbon emissions they should be valued not in tonnes, but in tonne-years over the period during which their effect on climate is relevant<sup>312</sup>.

4.9. Other cumulative effects also need to be considered, of which the two most appropriate would be the scheme's cumulative effects on NH's network, and those with the SRN RIS2 programme. The SRN emitted 33MtCO<sub>2</sub>e in 2020 against which NH is *'planning for a trajectory of 31-26 MtCO<sub>2</sub>e by 2025, 25-15 MtCO<sub>2</sub>e by 2030, 20-7 MtCO<sub>2</sub>e by 2035, 8-3 MtCO<sub>2</sub>e by 2040, 5-1 MtCO<sub>2</sub>e by 2045 and net zero by 2050'*<sup>313</sup>. An assessment should be made against the higher and lower figures.

4.9. By the end of the 5<sup>th</sup> carbon budget RIS2 schemes would emit 20MtCO<sub>2</sub><sup>314</sup> to which the A57 Link Roads would contribute 0.4%. The Transport Forecasting Report indicates that in Appendix C some SRN schemes have been included in the UL (see below). However many have been omitted.

4.9. In conclusion the cumulative effects of emitted carbon due the effects of the scheme must be assessed with other existing or approved projects. This has not been undertaken and therefore the EIA has not fulfilled the EIA Regs.

### **Cumulative effects on landscape and visual effects**

4.9. Cumulative landscape and visual effects must be considered as part of the LVIA<sup>315</sup> which specifies the consideration of *'other developments past present or likely to occur in the foreseeable future'* that should be considered for their cumulative effects with the scheme - the development of land between the new roads and the existing settlement, and in open countryside; and extension of the Link Roads east to bypass Hollingworth and Tintwistle. We

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<sup>311</sup> Ch14 deadline 1, 14.10.1

<sup>312</sup>

<sup>313</sup> Net Zero Highways: Our 2030/2040/2050 plan, NH, 2021

<sup>314</sup> The carbon impact of the national roads programme, Transport for Quality of Life, July 2020

<sup>315</sup> Guidelines for Landscape and Visual Impact Assessment 3rd Edition

have dealt with infill development in the chapter on Green Belt. In addition to the effect on openness it would impact adversely on landscape and visual amenity.

4.9. The bypass is identified in the Sheffield City Regional Mayoral Combined Authority's Roads Implementation Plan to be delivered between 2019 and 2024<sup>316</sup>; in Greater Manchester's Transport Strategy 2040<sup>317</sup> and Delivery Plan 2021-2026<sup>318</sup>; and in Transport for the North's Investment Programme Table 3 as an intervention before 2027<sup>319</sup>. It appears in the relevant development plan – TMBC UDP which NH is relying on to justify the legitimacy of the scheme within the Green Belt. It therefore falls into Tier 3C, as identified in PINS Advice Note 17 Table 2 – '*Assigning certainty to 'other existing development and/or approved development'*', and is therefore 'least certain' as a development for the future. However given the refusal of the applicant to consider solutions for Hollingworth and Tintwistle and the local appeal for a solution to the environmental degradation, its cumulative impact with the scheme should be considered.

### **Existing/approved projects and the Uncertainty Log (UL)**

4.9. In 4.2 (Effects of the scheme on traffic) we noted inconsistencies between documents in applying the Uncertainty Log of future developments within the traffic model. The full list of highway schemes and the list of developments in local authority areas outside Tameside and High Peak Boroughs is only available in the Transport Forecasting Report<sup>320</sup> supplied to us by NH.

#### *Excluded Highway Schemes*

4.9. Highway schemes are listed in Appendix C of the Transport Forecasting Report. The excluded schemes are as follows.

#### (i) M60/M62/M66 Simister Island M60 J18

This scheme does not appear in the UL but it is listed in RIS2<sup>321</sup> as a commitment with the preferred route announced in 2021 and an allocation of £100-250million for funding it. It appears as a preapplication national infrastructure project on the PINS website<sup>322</sup>. A scoping report was submitted to PINS on 2 July 2021, which makes this scheme a Tier 2 scheme. Ten miles lie between it and M60 J 24, and it represents the point to which the Affected Road Network for the A57 Link Roads extends in northeast Manchester. It should have been included in the list of highway schemes.

#### (ii) M60 J24 Denton Island Interchange

In the Transport Locality Assessments for Tameside Allocations<sup>323</sup> document proposed changes to the M60 J24 interchange are part of the Trans-Pennine Upgrade. '*Considerations as to mitigation at the M60 Junction 24 Denton Island form part of the wider planned Trans-Pennine Upgrade, which is currently being investigated by Highways England's Major*

<sup>316</sup> Sheffield City Region Transport Plan 2018-2040 5.2.3

<sup>317</sup> Greater Manchester Transport Strategy 2040 revised 2021, page 92

<sup>318</sup> Our 5 Year Transport Delivery Plan 2021-2026, (2021); page 24 Map 3 In the next 5 years we will develop options for...; part of Greater Manchester Transport Strategy 2040

<sup>319</sup> [redacted] page 26 Table 3 Specific Interventions before 2027

<sup>320</sup> Authored by Balfour Beatty Atkins all dates removed - A57 Transport forecasting Package

<sup>321</sup> Road Investment Strategy 2, 2020-2025 DfT March 2020

<sup>322</sup> [redacted]

<sup>323</sup> Places for Everyone, Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 Appendix B, pages labelled B1-B51 [pages 71-127 in the electronic pdf]

*Projects and the Department for Transport.* The junction is included in the Highways England Risk Register for the TPU (Tameside Allocations page B34, para 15.3.5). The M60 J24 interchange has long been recognised as a pinch point for congestion in need of improvement<sup>324</sup>. It is operating in excess of capacity, 130%-137% in peak hours<sup>325</sup>. To address this, three large scale options - a new at-grade turn or two grade-separated flyovers – are proposed at the junction which would change the operating capacity to between 80% and 111% in the AM peak and between 73% and 84% in the PM peak depending on which option is implemented. The addition of an extra 8,000 vehicles including an extra 500 HGVs every weekday in 2025 the opening year of the A57 Link Roads<sup>326</sup> to an existing congested junction, mean the impacts on the M60 J24 interchange and the proposed mitigation measures should be included in the assessment of effects of the two schemes together.

### (iii) Hollingworth-Tintwistle Bypass

As this is a Tier 3C scheme according to PINS Advice Note 17 it should be included in current analysis of the scheme.

### (iv) Trans-Pennine Tunnel

*'The development of the Scheme has been considered alongside wider plans to improve Trans-Pennine connectivity' (1.3 Introduction to the Application, para 2.3.2). TfN<sup>327</sup>, GMCA<sup>328</sup> and SCRCA<sup>329</sup> support a dual carriageway between the M67 and the M1. A new road appears in RIS2 as follows. 'Trans-Pennine Tunnel – Manchester and Sheffield are not connected directly by a high-quality road. Work during RIS1 has shown that traffic between the two cities is one fifth of that between Manchester and Leeds. However, the presence of the Peak District National Park means that any action to correct this must take full account of potential environmental consequences. We will work in partnership with Transport for the North, local highways and national park authorities to finalise whether high-quality but cost effective connections can provide an appropriate balance between the levelling up of the economy and the environmental impacts on a valued and protected landscape.'*

The proposed Trans-Pennine Tunnel, of which the A57 Link Roads is the first step appears in the 'Places for Everyone', document para 10.55, and 'will play a very important role in realising the potential of our boroughs, Greater Manchester, as a whole, and the wider North' (para 2.27). Transport for the North's Major Roads Report identifies it as a candidate scheme for RIS3<sup>330</sup>. It is no longer a long tunnel under the whole of the PDNP but a 5-mile tunnel under the moors and would see 35,000 vehicles a day passing through Longdendale. The severe adverse impacts that were identified outside the portals of the longer tunnel would now be visited directly on the Park itself.

4.9. Excepting Simister Island, all these schemes are part of the TPU, of which the A57 Link Roads are a part, and provide compelling evidence of the need to scrutinise the whole of the

<sup>324</sup> South Pennines Route-Based Evidence Strategy Report, Highways England, 2014, Figure 3; South Pennines Route Strategy, Highways England, 2017 p.29

<sup>325</sup> Table 9, page B32; paras 15.3.5 -15.3.8, page B34; Figures 4.1-4.3 pages B50-B51 & Table 10 page B35 in Transport Locality Assessments for Tameside Allocations 2020; 2021 Addendum Table 13

<sup>326</sup> A57 Link Roads, ES, Appendix 2.1 Traffic Data, AAWT Opening Year 2025

<sup>327</sup> Strategic Transport Plan, Transport for the North, 2019 page 125

<sup>328</sup> Greater Manchester Transport Strategy 2040, para 271

<sup>329</sup> SCR Transport Plan to 2040 para 5.2.3; The Mayor's Vision for Transport SCR Dec 2018; SCR Integrated Rail Plan p32 (June 2019); Letter confirming support from the SCRCA Transport Board to CPRE SY, Feb 2020;

<sup>330</sup> [REDACTED] Major Roads Report, TfN, 30 Dec 2021

strategic route, and not just a short bypass round Mottram. They also fulfil the criteria of Tier 3C schemes – ‘*Identified in other plans and programmes (as appropriate) which set the framework for future development consents/approvals where such development is reasonable likely to come forward*’.

*Threshold for excluding developments in local authority areas outside Tameside and High Peak Boroughs*

4.9. The Transport Forecasting Report Appendix B supplies the long list of developments that met the relevant criteria to be considered for the UL. To those developments lying outside Tameside and High Peak Boroughs a further threshold was added which developments had to pass in order to be included in the UL.

4.9. The thresholds were more than 200 dwellings for residential development; and for commercial development type B1 > 10,000 sqm, B2 > 1,500 sqm, and B8 > 5,000 sqm. All other commercial development types were included without the application of a threshold (Transport Forecasting Report 3.6.6).

4.9. In order to ascertain if a significant number of projects were excluded from the UL we applied the threshold Barnsley and Sheffield housing developments. Our results suggests NH’s approach has led to exclusions from the UL that could lead to underestimation of the cumulative impacts of the scheme with other projects.

4.9. In Barnsley, looking at forecast developments for 2015-2040, there are sites that would supply a total 4,152 dwellings. As 1,241 dwellings would be delivered on sites for 200 or less houses these developments would be excluded from forecasting. This exclusion would cover 29% of the housing numbers in the UL in Barnsley. In Sheffield 6,366 dwellings would be delivered on sites for 200 or less houses and would be excluded from the forecasting. This exclusion would cover 75% of the housing numbers in the longlist.

4.9. All these exclusions (7,607 dwellings) from the transport forecasting appear inappropriate to us given the objectives of the scheme. The traffic generated by them could substantially increases traffic flows across the Pennines, and should have been considered as part of the cumulative effects. Although only 2% of journeys from South Yorkshire are made to Greater Manchester<sup>331</sup> if all the new journeys were made on the A628T they would significantly increase traffic along the route.

4.9. Appendix B appears to supply the forecasting development for 2015-2040 in square metres but the type of commercial development is not given. Therefore assessing the impact of the employment land is more difficult. There are 51 sites of variable area listed but we do not know the category of development (B1, B2 or B8). Each of these would generate very different traffic flows. The examination needs to understand how many potential journeys have been excluded from the transport forecasting.

## **Conclusion**

4.9. There has been no assessment of the cumulative impact on GHG with respect to appropriate existing projects such as RIS2 and the SRN traffic emissions, or on landscape and visual amenity with respect to specific potential developments in the locality. Developments which could generate significant traffic have been excluded from the future scenarios used to assess the scheme. This would lead to underestimation of the carbon

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<sup>331</sup> Transport Assessment Report Table 3.5

emissions, of air pollutants, of the impacts on landscape and visual amenity, and on the PDNP, and on road safety. The cumulative effects of the scheme need rigorous scrutiny.

#### 4.10 SUMMARY OF PLANNING BALANCE

This is presented in the table overleaf and demonstrates that the adverse effects of the scheme outweigh the benefits. The effects on safety, on carbon emissions, on the purposes of the Green Belt and the openness of the Green Belt, on landscape and visual amenity, and on the Peak District National Park are significantly adverse and weigh substantially against the scheme. Parts of Mottram (Hyde Road and Mottram Moor) and Hollingworth (Woolley Lane) experience improvements to the public realm but other parts of these townscapes, Glossop and Hadfield experience detrimental impacts due to increased traffic, leading to an overall neutral effect. Improvements in air quality are largely because polluting vehicles have been moved away from sensitive receptors. There is biodiversity gain from increases in area of selected habitats and the length of hedgerows, although mixed outcomes for different species.

**4.10 SUMMARY OF PLANNING BALANCE – THE ADVERSE EFFECTS OF THE DEVELOPMENT WOULD OUTWEIGH ITS BENEFITS (NPSNN 1.2)**

	<b>Positive</b>	<b>Neutral</b>	<b>Negative</b>
<b>Transport</b>	Reduces congestion and severance on Hyde Road and part of Mottram Moor, and on Woolley Lane	Impact on journey times uncertain as complete journeys not tested	Increases traffic in parts of Mottram; on residential roads in Glossopdale, and on trans-Pennine routes through PDNP; contrary to national, regional and local policies
<b>Safety</b>			<ul style="list-style-type: none"> <li>Increases collisions across the network, contrary to NPSNN 4.60-4.66, and national, regional and local policies</li> <li>Traffic diverts off 'safe' M62</li> </ul>
<b>Climate emissions</b>			<ul style="list-style-type: none"> <li>Increases emissions during a climate emergency</li> <li>No evidence emissions would not impair meeting UK carbon budgets and Net Zero 2050</li> <li>Could impair achievement subnational regional and local carbon budgets</li> </ul>
<b>Air Quality</b>	Improves for majority against Limit Value for NO2	Information missing on AQMA, GMCA CAZ and PM. Would jeopardise compliance with AQS objectives and Air Quality Directive. SoS does not have necessary information to make a decision (NPSNN 5.11-5.13)	<ul style="list-style-type: none"> <li>AQMAs may need extending</li> <li>Some exceedances of NO2 above Limit Value remain</li> </ul>
<b>Green Belt</b>			Impairs 4 purposes of Green Belt; is inappropriate development in Green Belt; no very special circumstances exist; harms openness of Green Belt
<b>Landscape Townscape Visual amenity</b>	Reduces traffic on Hyde Rd part of Mottram Moor and Woolley Lane		Downplays impact of permanent and irreversible damage to landscape – scheme destroys distinctive character, harms relative tranquillity; imposes uncharacteristic road infrastructure, earth banks, concrete underpasses, bridges, signs, lighting & linear woodland. Traffic harms National Park tranquillity and amenity



<b>Noise</b>	Reduced noise for majority of those living on Hyde Road and Woolley Lane	Winners and losers - 4 Noise Important Areas improve; 4 Noise Important Areas worsen	With or without the scheme, in 2025: <ul style="list-style-type: none"> <li>At night, Hattersley, Mottram, and Hollingworth experience road traffic noise above the lowest observed adverse effect level (LOAEL);</li> <li>Day and night, those living on Mottram Road near the M67 roundabout Junction 4, on Market Street and Broadbottom Road in Mottram, on the A628T through Hollingworth, and on Hadfield Road experience noise levels of significant observed adverse effect levels (SOAEL) or greater;</li> </ul>
<b>Access and PRoW</b>	New bridleway alongside single and part of dual carriageways (NPSNN 3.17)	Restores PRoW severed by scheme	<ul style="list-style-type: none"> <li>Harms amenity, tranquillity and enjoyment of countryside on doorstep and as experienced on new bridleway and local PRoW network;</li> <li>Harms statutory purposes of National Park</li> </ul>
<b>Biodiversity</b>	Net gain in habitats: <ul style="list-style-type: none"> <li>Deciduous woodland (loss 7h; gain 6.08ha)</li> <li>Wet woodland (loss 0.1ha; gain 0.65ha)</li> <li>Acid grassland (loss 0.3ha; gain 1.64ha)</li> <li>Hedges (loss 3.3km; gain 6km)</li> <li>Floodplain mire (loss 0.3ha; gain 1.13ha)</li> </ul>	Slight adverse impacts remain on hares, otters and toads South Pennines Moors SAC & Peak District Moors SPA scoped out of assessment for nitrogen deposition as scheme unlikely to result in any likely significant effects but traffic flows increase on A628T and meet criteria for assessment in 2040	Potentially increased road kill of mountain hares in PDNP
<b>Flood risk</b>	Floodplain mire (loss 0.3ha; gain 1.13ha)	Scheme considered essential infrastructure therefore permitted	Scheme lies in flood zones 2 and 3 of River Etherow
<b>Cumulative effects</b>			Not undertaken for GHG

## PART 5 CONCLUSION

*‘Under section 104 of the Planning Act the Secretary of State must decide an application for a national networks nationally significant infrastructure project in accordance with this NPS unless he/she is satisfied that to do so would:*

- *lead to the UK being in breach of its international obligations;*
- *be unlawful;*
- *lead to the Secretary of State being in breach of any duty imposed by or under any legislation;*
- *result in adverse impacts of the development outweighing its benefits;*
- *be contrary to legislation about how the decisions are to be taken.’ (NPSNN 1.2).*

The carbon emissions could lead to the UK being in breach of its international obligations under the Paris Agreement and not achieving its NDC by 2030. The NO<sub>2</sub> emissions could impair the ability to comply with the Air Quality Directive and to achieve local authority AQS objectives.

The DCO application does not fulfil the EIA Regulations with respect to assessment of the scheme’s impact on subnational regional and local carbon budgets and air quality standards; and on the cumulative effects on GHG.

The DCO if approved would lead to the SoS being in breach of his section 62 duty with respect to National Parks (NPSNN 150) and of the conditions of National Highways Licence.

The disbenefits of the scheme outweigh its benefits.

Instead the measures proposed in *Car Free Low Carbon Travel for Longdendale and Glossopdale* should be implemented. These would meet with requirements in national regional and local policy for carbon emissions reduction, reduced traffic, improved air quality, increased public transport use walking and cycling, and improved public health and well-being.

## PART 6 APPENDICES

### Appendix A

#### Mottram-Hollingworth-Tintwistle Bypass & A628/A616 Route Restraint Measures

#### Explanation of the Further Change in the Traffic Forecasts 4<sup>th</sup> December 2007

A57/A628 Mottram-Tintwistle Bypass &  
A628/A616 Route Restraint Measures

HA Doc Reference:  
HA/73

A57/A628 Mottram – Tintwistle Bypass & A628/A616  
Route Restraint Measures  
Public Inquiry

HA Document Reference: HA/73

Explanation of the Further Change  
in the Traffic Forecasts

**A57/A628 Mottram-Tintwistle Bypass &  
A628/A616 Route Restraint Measures**

HA Doc Reference:  
HA/73

## Explanation of the Further Change in the Traffic Forecasts

### **1 INTRODUCTION**

- 1.1 As stated to the Inquiry on Day 14, (Tuesday 6 November 2007) further inconsistencies have been discovered within the traffic forecasts, in addition to those that were identified in September (Document HA/45).
- 1.2 Following the issues identified in September, a comprehensive set of checks has been carried out on the network representing the Scheme. These checks have included examination of the link coding and a review of the forecasting processes including the status of the traffic growth factors used in the model.

### **2 CODING INCONSISTENCIES**

- 2.1 The checks have revealed inconsistencies with the allocation of speed flow curves on certain links in the traffic model affected by the coding of the scheme. Speed flow curves define relationships between the reducing speed of traffic with increasing traffic flow, and they vary by type of link so that different curves are defined for different standards of rural and urban roads. Inconsistencies were found in speed flow curve allocation on links representing a section of the A616(T) southeast of Flouch to a node close to the A616(T) / B6088 junction, and on a section of the A628(T) west of Flouch to Windle Edge. Corrections to the speed flow curves on the A616(T) has the effect of increasing forecast journey times on the A616(T), and correction of those on the A628(T) has the effect of decreasing forecast journey times on the A628(T).
- 2.2 The detailed checks also showed inconsistencies in the coding of traffic signals at a junction in Glossop. Signal control data had been omitted for the pm peak

**A57/A628 Mottram-Tintwistle Bypass &  
A628/A616 Route Restraint Measures**

HA Doc Reference:  
HA/73

and on one arm of the junction in the interpeak period. The alteration of these will increase delays at the junction, but will not cause a significant effect on the traffic forecasts.

- 2.3 Detailed checks also showed that speed limits on sections of the bypassed A628 were specified as follows:- between Hollingworth and Tintwistle was specified as 30 mph instead of 40 mph, and from the eastern limit of Tintwistle to Townhead Roundabout was specified as 30 mph instead of 40 mph. Due to the relatively short length of the affected links, alteration of these inconsistencies result in relatively small changes in traffic forecasts.
- 2.4 The detailed checks have also uncovered a number of minor inconsistencies, relating to link lengths, saturation flows and traffic signal timings. These require adjustment to the traffic model, but tests have indicated that none of them make significant differences to forecast traffic flows or junction operation.

### **3 FORECAST GROWTH**

- 3.1 The traffic model supporting the February 2007 Environmental Statement used TEMPRO version 5.2 and National Road Traffic Forecasts (NRTF) 1997 traffic growth factors. An updated version of TEMPRO, version 5.3, was issued in October 2006, after the traffic forecasts had been finalised to allow environment assessments to be carried out for publication of the Environmental Statement in February 2007.
- 3.2 Revised National Traffic Model (NTM 07) growth information was issued in October 2007 and this supersedes the NRTF 1997 forecasts. It is thus considered appropriate by the Highways Agency to incorporate TEMPRO version 5.3 into the revisions to the traffic model and to follow the latest DfT advice to use the NTM 07 growth.

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**4 DO MINIMUM SCHEMES AND DEVELOPMENTS**

- 4.1 Given the extent of the above work the opportunity has also been taken to review the programmed transport schemes which are coded into the transport model, and updated information has been obtained, so that the opportunity can be taken to bring the future networks up to date.
- 4.2 In previous modelling the growth of air passenger trips generated by Manchester Airport was based on the draft master plan. This information is being updated with the data from the final version of the master plan. Other changes in traffic due to planned developments are taken into account by TEMPRO version 5.3.

**5 REVISION TO TRAFFIC FORECASTS**

- 5.1 Work is progressing on the production of revised traffic forecasts which will incorporate all the above changes. Consideration will also be given to the possible need to adjust the Route Restraint Measures.
- 5.2 Given the extended timetable for the Inquiry, and the fact that the traffic survey base year is 2001, the opportunity is also being taken to undertake a Present Year Validation as recommended in DMRB.

**6 NECESSARY REVISIONS TO THE ENVIRONMENTAL  
STATEMENT, EVIDENCE AND OTHER HA DOCUMENTS**

- 6.1 As a result of the above issues all documents submitted as part of the September 2007 revision no longer have any relevance and should be disregarded.
- 6.2 The HA intend to revise the original Proofs of Evidence, Environmental

**A57/A628 Mottram-Tintwistle Bypass &  
A628/A616 Route Restraint Measures**

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Statement and other relevant documents. It is expected that this information will not be available until after Easter 2008. This is because the traffic forecasts upon which much of the evidence is based will not be finalised until early 2008.

- 6.3 In addition the opportunity will be taken to include updates of DMRB Vol11 (DD 136) that have taken place since the original ES was published. Necessary factual changes that have occurred since publication will also be incorporated, for example the revised proposals for exchange land.
- 6.4 The HA does not envisage being in a position to give any further information until late February 2008.

## Appendix B

### Summary of CPRE letter 24 May 2021 to PINS re: Inadequacy of Consultation

#### 1. Consultation not in accordance with Statement of Community Consultation

The Planning Act 2008 places the applicant under a duty to consult local authorities (s. 42), to consult the local community (s.47) and to publicise the consultation (s.48). We believe that the 2020 consultation on the A57 Link Roads was inadequate under s.47 (7) '*The applicant must carry out consultation in accordance with the proposals set out in the statement,*' which is the Statement of Community Consultation (SoCC). There are three reasons for this inadequacy – (a) the impact of the Covid pandemic; (b) confusion over what was being consulted on; (c) lack of information from which to make an informed response. As a result the Gunning Principles have not been met and the consultation is not legitimate.

##### *(a) Impact of Covid pandemic on 2020 consultation with local community*

National Highways (NH) held three public consultations on road building in the area – a non statutory consultation in 2017<sup>332</sup> and two statutory consultations in 2018<sup>333</sup> and 2020<sup>334</sup>. The 2018 statutory consultation was conducted under normal conditions. The 2020 statutory consultation followed a similar process showing that NH did little to mitigate the impacts of the lockdown.

The 2020 consultation was launched the day the country went into a national lockdown in order to cope with the Covid 19 pandemic<sup>335</sup> which continued throughout the consultation. People had to stay at home and only leave for specific purposes (which did not include consultation on a major infrastructure project), keep a social distance of 2 metres and wear a face mask outside the home; meetings indoors were not allowed unless they were part of your household. All non-essential retail and indoor leisure outlets closed and everyone was asked to work from home if at all possible.

NH made no special arrangements for the consultation during the Covid-19 pandemic except organising 3 webinars. It also expected people to view hard copies of documents in cramped local retail outlets totally unsuitable for reading them, with one of the 4 venues closed throughout the lockdown. We believe that NH grossly underestimated the impact of Covid on people's ability to engage. Not only were people trying to cope with existing under the Covid restrictions, but they were also not able to meet and discuss the proposals. Contact was fleeting from 2metres distance and wearing a mask, in fear of catching the virus and with other more pressing concerns to worry about. Local communities were denied the opportunity for informal discussion between neighbours and friends, and for public meetings and exhibitions where they could ask questions, hear the views of others, and scrutinise large scale maps and plans. Webinars, which did not allow deliberation, debate or

<sup>332</sup> Trans Pennine Upgrade Programme Non statutory Consultation Report Oct 2017

The 2017 event was preceded by a small public awareness in Hollingworth and Tankersley in 2016.

<sup>333</sup>

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rational discussion with the audience, and individual phone calls are no substitute for any of these. This is a highly controversial scheme which, in NH's own words, has been under development for 50 years. To promote understanding of what is proposed, consultation should have been delayed allowing everyone to engage through face to face meetings, exhibitions and informal community discussion.

Local residents expressed their concerns about the consultation continuing during the lockdown through the media<sup>336</sup>, to local councillors and through NH's webinars. NH responded that it wanted to avoid any delays, and was following best practice.

***(b) Confusion as to what scheme was being consulted upon***

*At a meeting with PINS on 2 February 2021 'the Applicant explained that a number of the responses received comprising objections to the proposed scheme had been focused upon an incorrect assumption that the scheme formed part of a larger programme of work across the Pennines. The Applicant clarified that the emerging application was for a discrete, committed scheme with discrete objectives associated with the network at Mottram. It was not associated with any wider programme of development of the Strategic Road Network in the region'.*

We also understand that some people were unaware that the proposal did not include a bypass of Hollingworth and Tintwistle.

In all 3 consultations the information about the scheme has always referred to the Trans-Pennine Route between Manchester and Sheffield. The objectives in the PEIR Vol 1 para 2.2.1 were not 'discrete' (as claimed by NH), embrace the entire route between Manchester and Sheffield, refer to Hollingworth, Tintwistle and the National Park, and suggest a broad geographical remit. The first sentence explaining the 2020 scheme in its SoCC page 2 and repeated on page 3, and also in the Brochure page 3, continued this broad remit; '*We've developed a project to improve journeys between Manchester and Sheffield, as this route currently suffers from heavy congestion which creates unreliable journeys.*' The diagram Extent of Trans-Pennine Upgrade in the 2020 Brochure identified the Trans-Pennine Route between M67 Manchester and M1 South Yorkshire.

Announcements in the media would also have fuelled this confusion. The Secretary of State for Transport, Grant Shapps (the decision maker for the scheme) in a video on the local MP's facebook page<sup>337</sup> on the day the consultation opened<sup>337</sup> promised '*This investment will cut journey times, lower pollution and keep traffic away from rural villages. It will also improve connectivity between two key northern cities: Sheffield & Manchester.*' The only rural village from which traffic would be kept away would be Mottram. Anyone hearing the plural villages could have been misled into believing the scheme also kept traffic away from Hollingworth and Tintwistle. The local press repeatedly started articles with the line that the A57 and A628 between Manchester and Sheffield currently suffer from heavy congestion, creating unreliable journeys. Local MPs identified that the scheme would form part of a bigger scheme in the future, as did the 2017 and 2018 brochures. It is therefore hardly surprising that people may have been confused about what exactly was being proposed

<sup>336</sup> Tameside Reporter 12 Nov 2020 Letters page 18

<sup>337</sup>

between Manchester and Sheffield. It is quite disingenuous for NH to suggest that those opposed were confused when many of those in favour may also have been confused.

### ***(c) Lack of information***

#### ***(i) Lack of information about impacts on Hollingworth and Tintwistle***

The most serious omission from all documentation for the 2017<sup>338</sup>, 2018 and 2020 consultations was the impacts of the scheme on Hollingworth and Tintwistle. A key concern raised during the 2018 consultation<sup>339</sup>, that NH declared it *'is unable to resolve'*<sup>340</sup>, was that Hollingworth and Tintwistle are not part of the solution. *'The current proposed scheme would introduce measures to alleviate the issues currently being encountered in the Mottram area. Additional studies have been highlighted by Transport for the North to enhance the future connectivity between Manchester and Sheffield that will look to address the issue in the adjacent villages. There is no commitment to any other scheme at this time. An update to the Roads Investment Strategy RIS is expected early 2020'.*

During the 2020 consultation NH refused to engage with questions on solutions for Hollingworth and Tintwistle, stating that the scheme for wider relief is still at an early concept design stage. Given that traffic along the entire Trans-Pennine route will be affected by the scheme this is a serious oversight.

#### ***(ii) Lack of information to inform responses***

The first statutory consultation in March 2018 consultation was inadequate<sup>341</sup>. There was little information as to the impacts of the scheme on the environment or the community. As a result High Peak Borough Council, Derbyshire County Council and the Peak District National Park Authority all submitted holding objections.

The 2020 consultation (SoCC p4) stated that *'this consultation will focus on changes to the A57 Link Roads scheme since the last public consultation in 2018:*

- *Improvements to the design*
- ***Extra information we now have about anticipated environmental impacts.*** (our emphasis)

As for the 2018 statutory consultation, the 2020 Preliminary Environmental Information Report (PEIR) appeared to be work in progress. Apart from baseline information on noise and air pollution, the 2020 PEIR added little to the PEIR accompanying the 2018 consultation. There was no transport assessment or traffic modelling results, and the full appraisal of the impacts of the scheme on cultural heritage, landscape, biodiversity, noise and vibration, air quality, carbon emissions, and road drainage and the water environment were missing. Neither the public nor the statutory consultees had the information to make the *'well-informed responses'* NH posits in the SoCC. Traffic flow data, essential to understand the impacts of the scheme on all aspects of the environment, was missing.

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<sup>338</sup>Trans Pennine Upgrade Programme Non statutory Consultation Report Oct 2017 4.10.3

<sup>339</sup> Trans Pennine Upgrade Report 2018 4.2.1

<sup>340</sup> Trans Pennine Upgrade Report 2018 4.2.1

<sup>341</sup> We brought this to the attention of the Planning Inspectorate and relevant local authorities by letter dated 11<sup>th</sup> March 2018

Derbyshire County Council, High Peak Borough Council and the Peak District National Park Authority all submitted holding objections again based on lack of information and the absence of any traffic modelling or transport assessment. It seems totally contrary to good practice to have received holding objections from the statutory consultees in response to the 2018 consultation, and not addressed those concerns before holding another consultation. An effective approach would have been to address all the statutory consultees' concerns and to then seek public views before proceeding to a DCO application.

The glossy Brochure distributed in hard copy to all homes within the consultation zone is likely to have been the only document that most people sourced for information. It (pp19-21) identified that the potential environmental impacts were for the future - '*we'll assess the impacts*' – although NH claimed to have already reduced '*the environmental impact of the new road.*' There was no mention of greenhouse gas emissions (which would increase with the scheme, PEIR NTS 11.2.1), despite local authorities in the area having declared a climate emergency and many local people being concerned about addressing this.

The flyover video was unrealistic and could have misled people as to the impacts of the scheme. At the Mottram Moor new junction, where traffic flows pre-Covid and for the last 15 years have been ~33,000 vehicles per day, about 10 vehicles were shown and gave a misleading impression of the scheme in operation. The failure to supply information about the impacts of the scheme will have resulted in uninformed and potentially misled responses.

## **2. Gunning principles have not been met**

The Gunning principles<sup>342</sup> define that a consultation is only legitimate when four principles (in bold below) are met. We believe that the Gunning principles have not been met, as follows.

**1. The proposals are still at a formative stage** – The lack of information presented for the statutory consultation indicated the proposals were still at a formative stage.

**2. There is sufficient information to give 'intelligent consideration'** - The information contained in a consultation document should not be as inaccurate or incomplete as to mislead potential consultees in their responses. In NH's own words some consultees were confused and misled. The poverty of information about the future of the scheme led Derbyshire County Council, High Peak Borough Council and the Peak District National Park Authority to submit holding objections.

**3. There is adequate time for consideration and response** - There must be sufficient opportunity for consultees to participate in the consultation. NH allowed 6 weeks for a 2018 statutory consultation under normal conditions. It used the same time period for a statutory consultation under the most difficult conditions created by a pandemic and when there was no urgency to proceed.

**4. 'Conscientious consideration' must be given to the consultation responses before a decision is made** - Decision-makers should be able to provide evidence that they took

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<sup>342</sup> [REDACTED]

consultation responses into account. Concerns about Hollingworth and Tintwistle were raised repeatedly through the 2017 non-statutory and the 2018 and 2020 statutory consultations, but no specific measures for these villages have been proposed. Equally damning is the fact that for the second statutory consultation, as for the first, Derbyshire County Council, High Peak Borough Council and the Peak District National Park Authority all submitted holding objections, based on similar grounds in both instances. This suggests that NH did not do 'what is right' and address those concerns before re-consulting.

### 3. Conclusion

The 2020 statutory consultation process for the A57 Link Roads was similar to that for the 2018 statutory consultation, and little was done to mitigate for the restrictions of the Covid pandemic. Hence, many people may well have been denied the chance to engage. There was also little information from which to make an informed response to the potential impacts of the scheme, and some information was misleading. Amongst those who did respond there was confusion over what was being consulted on. Even if NH had produced an exemplary engagement process, they cannot claim to have consulted when they did not give people the information required to make an informed response.

For all the above reasons we believe that the 2020 statutory consultation on the A57 Link Roads with the local communities did not fulfil the SoCC and did not meet the Gunning principles. We urge PINS to reject the application for a DCO.

## Appendix C

### CPRE PDSY Letter to DfT Minister re Trans-Pennine Routes Feasibility Study

The Rt Hon John Hayes MP  
Minister for Transport  
Department for Transport (DfT),  
Great Minster House,  
33 Horseferry Road,  
London, SW1P 4DR

37 Stafford Road  
Sheffield S2 2SF  
Tel: [REDACTED]  
[REDACTED]@friendsofthepeak.org.uk  
mail@cpresouthyorks.org.uk

Dear Minister,

13 April 2015

#### Trans-Pennine Routes Feasibility Study

The Friends are writing to express their concerns that the Department's recently published Report on the Trans-Pennine Routes Feasibility Study - a Summary and Stage 1, 2 and 3 reports does not reflect our concerns with the approach and outcomes of the study. We wish to place on record once again that we do not believe that the approach taken towards the impact on the Peak District National Park reflects its statutory protection, that webTAG guidance towards generating and sifting options was not followed, and that the assessment of the sifted packages was not robust. We are disappointed that our proposed package of measures did not receive a fair assessment. We believe it will need to be revisited in order to meet the test of major development in a National Park. Finally we would be grateful to receive copies of the Stage 3 report annexes referred to in para 2.1.6.

#### 1. Impact on the Peak District National Park

The study did not reflect the importance of the Peak District National Park, which must be conserved and enhanced as enshrined in National Park purposes<sup>343</sup>. The intervention specific objectives against which potential solutions were assessed did not reflect the sensitivity of the National Park environment. The report does not recognise that major infrastructure, such as package 1 or the climbing lanes within the Park, cannot simply be mitigated against (Stage 3 para 4.2.11); it has to pass through the test of major development, and be shown to be in the public interest and that there are exceptional circumstances. Although the report (Stage 3 para 4.2.30) refers to the National Parks and Broads Circular para 85 which is concerned with transport policy, it fails to quote the full reference which includes '*any investment in trunk roads should be directed to developing routes for long distance traffic which avoid the Park*'. Most importantly the study ignores para 31 of the Circular and National Planning Policy Framework para 116 which set out the test of major development. As the study fails to reflect this test it underplays the risks associated with progressing the chosen schemes.

#### 2. Generating and sifting options

The narrow focus of the key challenges and objectives led the study to concentrate options on new road infrastructure for car and lorry travel. As a result the study failed to maximise public transport, modal shift and smart choices, and minimise the need to travel, which

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<sup>343</sup> Environment Act 1995 S.61

would contribute to wider sustainability and health objectives and fulfil Government policy<sup>344</sup>. The non-road infrastructure measures considered were a package of an HGV control scheme with complementary sustainable transport measures, safety improvements, technology improvements and sustainable transport measures (although these were not defined).

The HGV control scheme with complementary sustainable transport measures is acknowledged as The Friends' proposal. It appears that what was tested through the first and second sift of options was an historical package of the 2004 *SPITS: The Way to Go* and the 2007 lorry control system (Stage 2 report para 4.3). This information was presented to the Highways Agency at the start of the study when they requested evidence of past schemes. According to the study's evaluation of this historical package, it appears that the HGV control system was only applied on the A628T and HGVs were allowed to divert onto less sustainable routes, instead of being confined to the motorway network around the Peak District. In our view the package was also underscored. Thus problems 4 (maintenance) and 5 (asset condition), and objective 5 (resilience of the routes) are all scored 'neutral impact' when they would all benefit from HGV removal. Despite these misinterpretations and incorrect scoring the HGV package total score was similar to schemes taken forwards to Stage 3. However, the package was rejected at the first sift on an unconvincing 'difficulty of delivery'.

At the third sift the study then introduced the 2014 package prepared by MTRU<sup>345</sup> on behalf of the Friends (Stage 2 para 5.4.22 & Stage 2 Annex 3). This up-to-date package appears not to have passed through the first and second sifts but was tested at the third sift using EAST (Stage 2 para 5.4.22 & Stage 2 Annex 3), where the scale of impact column is missing and it was underscored e.g. it scores amber for carbon emissions when it should score green, and its value for money is scored medium when it should score high (see MTRU's initial scores, attached, and '*CPRE lorry control proposal on the A628*', MTRU, 2005).

Well before the deadline for stakeholders to propose options for consideration by the study MTRU, on behalf of the Friends, approached the DfT and the Highways Agency requesting information and co-operation to flesh out a developing package. None was forthcoming. Consequently the 2014 Friends package that was tested by the study was incomplete. We have no way of knowing what was actually tested in the third sift and are disappointed that our proposed package of measures did not receive a fair assessment. It is clear that (a) the webTAG key principles<sup>346</sup> were not followed, as we stated clearly in our letter of 26 August 2014 and the MTRU report, and that (b) alternatives have not been properly tested as is required by the test of major development in a National Park. In order to meet the requirements of this test our package will need to be revisited as the proposed upgrade progresses through the planning system.

### 3. Traffic modelling

Despite the fact that the route connects two major conurbations and the study was intending to improve connectivity between them, the traffic model covered only Greater

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<sup>344</sup> National Planning Policy Framework paras 29 -41

<sup>345</sup> Final Report for the 2014 Trans-Pennine Routes Feasibility Study, incorporating the Interim Note of 31st July 2014; prepared by Keith Buchan, Director of MTRU, on behalf of the Friends of the Peak District, September 2014

<sup>346</sup> webTAG Transport Analysis Guidance – The Transport Appraisal Process, Guidance for the Technical Project Manager, Jan 2014, para 1.1.5

Manchester and 6 miles of the 30 mile long route between the M67 roundabout and the M1 in South Yorkshire. The model did not cover the other conurbation or modal choice, nor did it encompass a demand response. The report recognises that a new traffic model will be required (Stage 3 para 4.2.17) and that forecasts developed through it may give different results to those found by the study.

The study report continues to misrepresent the reasons for the withdrawal of the Highways Agency from the Mottram-Tintwistle public inquiry. The public inquiry was formally adjourned in December 2007 due to serious flaws and repeated errors with the traffic model. Revised traffic figures due to an error in the traffic modelling were followed by further inconsistencies in feeding data into the traffic model<sup>347</sup> which ultimately rendered the results of the model null and void. The statutory consultees were unable to validate the traffic model and the public inquiry was formally closed in March 2009. It would appear that with the latest traffic modelling history is repeating itself.

#### 4. Conclusions

We conclude that the Government Guidance as laid down in webTAG was not followed by the report. The risks with taking forward this package of proposals for the A628 trunk road corridor include both a failure to recognise National Park purposes or to understand the major test of development, and the application of an inadequate traffic model. When a new traffic model is developed to test the proposed schemes the 2014 Friends package should also be tested with it. We would be grateful to receive copies of the Stage 3 report annexes referred to in para 2.1.6.

Finally, as the government is progressing a study of potential road/rail tunnel options for the A628 corridor in order to protect the National Park<sup>348</sup> it appears perverse to inflict damage on the Park with the proposed upgrade. It would seem more appropriate to undertake the study and then review options afresh to increase connectivity between Manchester and Sheffield.

Yours sincerely,



Anne Robinson  
Campaigner

cc Tim Lawson & Richard Perry DfT; Patrick Moran Highways England; Angela Smith MP;  
Emily Fox PDNPA; Nick Tribe Natural England;

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<sup>347</sup> Mottram Tintwistle Public Inquiry 2007 HA-73 December 4<sup>th</sup> 2007; the Highways Agency announced that no more information would be available until late February 2008. It failed to meet this deadline and further deadlines in May 2008 and then October 2008.

<sup>348</sup> The Northern Powerhouse: One Agenda, One Economy, One North HMG & TfN (Transport for the North) March 2015

## Appendix D Glossary

AADT	Annual Average Daily Traffic
ADM	Area Detailed Modelling
AQS	Air Quality Strategy
ARN	Affected Road Network
CAZ	Clean Air Zone
CPRE PDSY	CPRE Peak District and South Yorkshire
DCC	Derbyshire County Council
DCO	Development Consent Order
DfT	Department for Transport
DPWF	Dark Peak Western Fringe
EIA	Environmental Impact Assessment
ES	Environmental Statement
EV	Electric Vehicle
GHG	Greenhouse Gases
GMCA	Greater Manchester Combined Authority
HGV	Heavy Goods Vehicle
HPBC	High Peak Borough Council
M no. J no.	Motorway Junction
LCA	Landscape Character Area
LCT	Landscape Type Area
LVIA	Landscape and Visual Amenity Assessment
LTP	Local Transport Plan
MTRU	Metropolitan Transport Research Unit
NCA	National Character Area
NH	National Highways
NPPF	National Planning Policy Framework 2021
NPSNN	National Policy Statement National Networks 2014
NSIP	Nationally Significant Infrastructure Project
PDNP	Peak District National Park
PDNPA	Peak District National Park Authority
PM	Particulate Matter
RIS	Road Investment Strategy



SLLCA	Scheme Level Landscape Character Area
SLTCA	Scheme Level Townscape Character Area
SRN	Strategic Route Network
TAN	Transport Action Network
TfGM	Transport for Greater Manchester
TMBC	Tameside Metropolitan Borough Council
TfN	Transport for the North
TPT	Trans-Pennine Tunnel
UDP	Unitary Development Plan
UL	Uncertainty Log
VP	Viewpoint