



A57 LINK ROADS

TR010034

DEADLINE 3 JANUARY 26TH 2022

RESPONSES TO DEADLINE 2 SUBMISSIONS

CPRE Peak District and South Yorkshire Branch

Unique Reference: 20029243

CPRE PDSY DEADLINE 3 SUBMISSION – RESPONSE TO DEADLINE 2 SUBMISSIONS

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Traffic and Transport – response to answers to the ExA’s First Written Questions

Question 3.1 What contribution to reducing congestion and reliability does the proposed development make outside the DCO boundary?

1. NH has not satisfactorily answered this question. The DCO boundary excludes the whole of Glossop and Hadfield/Padfield. DCC presents compelling evidence that journey times within Glossop would increase with the scheme in place due to congestion (Local Impact Report paras 7.30-7-31; Figure 7-2 & 7-3; Table 7-1¹). The scheme also causes traffic to use alternative routes and appears to create another major route – the Hadfield Alternative along Dinting Road². In his written representation, Peter Simon has demonstrated the substantial impacts this would have on this residential road³.

2. Further afield the impact on Greater Manchester is uncertain as Greater Manchester was excluded from the traffic modelling due to modelling noise⁴. The M60 J24 at the western end of the M67 is already severely congested (further details are in CPRE’s written representation pp99-100⁵). The scheme would increase this, not reduce it.

3. We are not convinced by NH’s arguments that journey times in the wider area are already addressed in the modelling. Instead of concealing complete journey times between Greater Manchester and Sheffield within the modelling, NH should reveal them – this is a reasonable request given that the first objective is to improve connectivity between these two conurbations (this also answers Q3.2).

Question 3.3 Benefits of the scheme to the SRN and its contribution to RIS2

4. In answer to Q3.3a) NH claims the scheme:

- improves safety for all – it does not. It increases traffic on a number of roads which NH itself admits increases the risk of crashes; increases in traffic increase the sense of road danger leading less people to use active travel which in itself reduces the safety risk. NH notes the severity of the crashes on the new road which may increase due to speed⁶. Traffic diverts off the safer M62 onto the A628T increasing the risk of crashes on that route⁷. The risk of crashes also increases on the M1 according to Figure 7.8 Transport Assessment Report.

¹ [REDACTED]

² CPRE submission of NH documents [REDACTED]

see pages 115 & 117 out of 790

³ [REDACTED]

⁴ CPRE submission of NH documents [REDACTED]

see page 33 of 790

⁶ Transport Assessment Report 7.2.12

⁷ Transport Assessment Report 7.2.13

- Fast and reliable journeys – none have been demonstrated as we noted above.
- Environmentally responsible – NH has attached little import to impacts on the PDNP or to the scheme’s increased climate emissions. It has underestimated the impacts on valued distinctive local countryside and people’s enjoyment of it;
- Meeting the needs of all users – those without a car do not benefit; the scheme may incorporate facilities for active travel but the impact of the scheme on physical activity is assessed as neutral by NH. It claims to improve bus service journey times and reliability without having assessed the impacts (see its answer to Q3.14)

5. In answer to Q3.3b) NH states that no other schemes are needed to achieve the benefits of the scheme. This ignores the current environmental degradation of Tintwistle and Hollingworth by traffic congestion and heavy lorries, which will worsen once the traffic jam at Mottram is relieved. It also ignores the environmental damage being inflicted on the PDNP. This would lead to demand for the next piece of road – the Hollingworth-Tintwistle bypass with severe environmental impacts, including on the PDNP.

Question 3.5 study area for transport

6. DCC and TMBC appear satisfied with the study area. As we made clear in both our written representation p22 para 4.2.4 and the report on alternatives, we are not satisfied. The exclusion of Greater Manchester from the area of detailed modelling and the affected route network underestimates the impact of the scheme on the urban area.

Question 3.6 data input and modelling; support for other transport modes

7. Both TMBC and DCC appear satisfied with data input and modelling. We are not. The PDNPA in its Local Impact Report 7.2.1 identified that *‘the figures produced by the National Highways modelling appear at odds with those available on the DfT website’*. We too identified (specifically with respect to links on the A628T) that modelled traffic flows were not following the trend of increasing traffic⁸. We have now compared the traffic flows in 2019 with those modelled by NH in 2025 for do minimum without the scheme. As the Table on page 6 below shows the majority of the traffic flows reduce in 2025, except on those roads subject to the modelling refinement which created the Hadfield Alternative⁹ where there are substantial reductions. As Covid impacts both on transport and the economy were not included in the model, these reduced modelled flows are not understandable. We continue to believe that the model has underestimated the traffic impacts of the scheme.

8. According to its answer to this question TMBC is satisfied that support for other modes has been addressed. DCC refers to the Longdendale Integrated Transport Strategy (Local Impact Report 7.29-7.31 and Figures 7-2 and 7-3). However, as we have shown above in

⁸ CPRE Written Representation pp 23-24 para 4.2.7-4.2.10

⁹ CPRE submission of NH documents

f see pages 115 & 117 out of 790

3.3a) NH has not satisfactorily supported other modes, particularly when looked at in the context of its licence conditions and the promises made in RIS2.

Question 3.11 High flows on Market Street in Mottram

9. The explanation given by NH to high flows on Market Street does not explain how these flows appear here and magically dissipate.

Question 3.12 Alternatives

10. We addressed this question ourselves in our report on *Car Free Low Carbon Travel for Longdendale and Glossopdale*¹⁰. In answering this question the Peak District National Park Authority indicated that it *'would be supportive of an assessment of the benefits and impacts of introducing weight limits on the A57 Snake Pass and A628(T)'*. It is supportive of a weight restriction on the Snake Pass as it is inherently unsuited to HGVs. *'With regard to the A628(T)... the removal of most HGVs would necessitate the introduction of additional restraint measures, possibly the introduction of a 50mph speed limit.'*

Question 3.19a) Gaps for those crossing the A628T and the Snake Pass

11. Only the Snake Pass has been addressed – see our response to this below. There is no assessment of crossing the A628T, where the sense of road danger is amplified by the large number of heavy lorries.

Question 3.20 & 3.21

12. No evidence has yet been produced to show that the proposed measures on the detrunked Hyde Road and on Woolley Lane would be effective in preventing through traffic from using the route. In our experience the police do not generally enforce speed limits and require lower speed limits to be self-enforcing. Drivers queuing at the new Brookfield junction would be able to see queues stretching back from the Mottram Moor new junction and would choose Woolley Lane to bypass the queue. A similar effect would apply on the dual carriageway as drivers at the Mottram Moor junction would see the congestion and choose to rat run along Hyde Road.

Question 3.25 Measures to minimise accidents and casualties

13. The answers focus on the A75 Snake Pass to which we have responded below. However other routes also experience an increased risk of crashes and these have not been addressed.

¹⁰

Comparison DfT 2019 Annual Average Daily Traffic (AADT) with National Highways modelled 2025 AADT Do Minimum (DM)
From ES Appendix 2.1, Tables 7.1 & 7.2 and answer to question 7

	M67 Godley	A57 Hyde Rd	A57T M Moor	A628T Holl'wth	A628T Crowden	A628T Wdhd	A6024 Holmfth	A6018 Roe Cross Rd	A560 Stockport Rd	A57 Mottram Rd
2019	35318	25449	30246	14560	12324	13788	1083	1486	6216	8677
2025 DM	28,450	19,200	29,200	15,950	10,700	12,400	700	15,250	2,350	3,450
difference	6868	6249	1046	1390	1624	1388	383	382	3866	5227
% difference	19%	25%	4%	10%	13%	10%	35%	3%	62%	60%
	Woolley Lane	A57 Brookfield	A626 Glossop Rd	A6016 Primrose Lane	A57 High St West	A57 High St East	Norfolk Rd	Victoria St	A57 Snake	Tintwistle
2019	18768	15781	4468	6724	17704	7045	2079	8195	4008	11686
2025 DM	16,650	15,200	12,350	8,700	11,550	14,550	8,200	9,550	3,050	9699
difference	2118	581	7882	1976	6154	7505	6121	1355	958	1987
% difference	11%	4%	176%	29%	35%	107%	294%	17%	24%	17%



Percentage reductions in 2025 modelled traffic flows compared to DfT 2019 counts – uncoloured cells are percentage increases.

Response on road safety and increased risk of crashes

14. The PNDPA's Local Impact Report draws attention to traffic increases and their associated increased risk of crashes within the National Park on a number of roads. This is contrary to National Park purposes and national, regional and local policy, as we have outlined in our landscape section below.

15. Instead of addressing these policy requirements there is now a proposal by DCC for average safety cameras along one of these roads, the A57 Snake Pass. This would compound the adverse impacts of the increased traffic and further harm the Park's special qualities and its statutory purposes. It would address the consequences of the scheme and not the fundamental issues underlying it.

Average speed cameras

16. In its answer to Q3.19b DCC states *'The safety of the A57 Snake Pass is a major concern to the County Council as it is traditionally a route where various safety measures have been undertaken over the years. Any increases in flows along this route will compromise road safety further. As the County Council has exhausted its road safety engineering options for the route the only solution to ensure safety along the route is considered to be a system of average speed cameras in order to ensure vehicle speeds and road safety is maintained to the required level. DCC considers that National Highways should fund the scheme'*. Safety on the Snake Pass remains an issue under discussion in the Statement of Common Ground with NH.

17. However, deploying this measure raises the issue of the impact of the infrastructure for the average speed cameras on the PDNP's special qualities. Substantial efforts have been made to conceal telecommunications infrastructure along this route in order to conserve those qualities. The police mast at the Snake summit shows what is required from statutory undertakers to reduce the impact of their infrastructure. Instead of a 20m high tower or pole the structure in the photo below was used, together with the burial of associated equipment.

18. No such concealment can be applied to speed cameras as they must be easily visible to drivers and accompanied by warning signs. There is one average speed camera scheme operating within the National Park on the A537/A54. On a 7-mile stretch of road there are 6 cameras on tall poles with a short gantry, all located within an open moorland landscape. They and their accompanying signage have a significant adverse visual impact on the surrounding area, even though their poles are coloured grey. There is another scheme at Langsett on the A616 within the National Park setting, also with adverse impacts. According to PDNPA policy *'The delivery of further average speed camera schemes should only be considered in extremis'*¹¹. As nineteen miles (or 30Km) of the A57 lies within the National Park, a substantial number of cameras would be required and would severely disfigure the landscape of the route.

¹¹ Transport Design Guide Supplementary Planning Guidance 2019 PDNPA

19. Average speed cameras would not conserve or enhance the National Park and their proposed implementation as a direct result of the scheme has neither exceptional circumstances nor would it be in the public interest. Any such cameras fail against all the policy requirements for such infrastructure within the Park.



Gap perception for vulnerable road users crossing the road

20. The impact of the traffic and of the increased risk of crashes would have a substantial impact on amenity. In response to Q3.19 NH has estimated whether or not the gaps in the traffic flows on the A57 Snake Pass would allow pedestrians to cross safely. *'The traffic flow on the A57 Snake Road in the do-minimum scenario is forecast to be up to 126 vehicles per hour in each direction. This equates to approximately an average of 2 to 3 vehicles per minute in each direction which means that the average gap between vehicles is up to approximately 30 seconds. The Scheme is forecast to increase the traffic flow on the A57 Snake Road to up to 192 vehicles per hour in each direction. This equates to approximately an average of 3 to 4 vehicles per minute in each direction which means that the Scheme will reduce the average gap between vehicles to approximately 20 seconds. Nonetheless, 20 seconds is a sufficiently long gap in the traffic flow to enable pedestrians to safely cross the road. It is, however, recognising that the forecast increase in traffic on the A57 Snake Road due to the Scheme is likely to reduce the frequency of gaps in the traffic flow when pedestrians will be able to safely cross the road and therefore result in some increase in waiting time for pedestrians wanting to cross the A57 Snake Road.'*

21. This assessment of gap perception on the A57 Snake Pass is simplistic. As its name suggests it has many blind bends, and poor sightlines. On the 20 miles between Glossop and Sheffield there are thirty-one locations where public rights of way meet the A57 road. Of these, twenty require a walk beside the carriageway as they do not meet up with another PRow immediately opposite. Eighteen of the PRow junctions with the A57 have poor sightlines. The speed limit for the whole 20 miles is 50mph. Even if drivers do not exceed this limit, using any length of the A57 carriageway with cars and lorries speeding past is an intimidating walk on narrow verges or on the road itself. All but six locations where PRow meet the road within the national park have no pavement. Ensuring a 50mph maximum speed would not improve the amenity for walks or cyclists that have to walk beside or cross the A57. Reducing the interaction of vulnerable road users to a perception of the gap available in which to cross misses many other points about road danger, and how people experience the national park and its tranquillity.

Green Belt – response to answers to the ExA’s First Written Questions

Question 4.1b

22. In answer to Q4.1b NH claims that *‘the scheme does not represent inappropriate development in the Green Belt, as the openness of the Green Belt would be preserved.’* We disagree. As an NSIP and part of the SRN the scheme is inappropriate development in the Green Belt. It would impair the openness of the Green Belt and there are no very special circumstances to allow the scheme to proceed, as we argued in our written representation.

23. 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 with significant sections open to view;
- Underpasses for Old Mill Farm and for Carrhouse Lane;
- Two tunnel portals;
- An over-bridge at Roe Cross Road,
- A bridge over the River Etherow;
- A major new junction on Mottram Moor;
- Modifications to the M67 J4 roundabout;
- A new junction at Brookfield;
- Road signs;
- Lighting posts;
- Incongruous post and rail fencing;
- Environmental acoustic barriers or 1.75Km of 2.5m close boarded fencing¹²; in the Consultation Report page 187 the acoustic fencing is 3-4m high;
- Badger restraint 500m from each of the badger crossings on both sides of the road 1m high (where there is no acoustic fencing)¹³;
- Deer fencing is not addressed in the REAC or in Ch 8 Biodiversity. According to the Consultation Report¹⁴ acoustic fencing (about 3-4 m) *‘will act as deer proof fencing. The Applicant is looking to raise the height of other ecological mitigation fencing in the area to prevent deer jumping on to the road and related signage will be considered.’*;
- Linear plantings that in DCC’s words¹⁵ *‘map the route of the road rather than responding to the particular landscape it passes through’*; in an open agricultural landscape the plantings would reduce openness.

24. Despite NH’s claim that the dual carriageway is designed to sit at a low level in the landscape¹⁶ it is raised up to 4.7m above existing ground level for most of its length¹⁷ – 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 a significant

¹² REAC NV 2 6

¹³ REAC BD2.20

¹⁴ Consultation Report

¹⁵ Local Impact Report HPBC and DCC, 10.21

¹⁶ Case for the Scheme 7.5.34

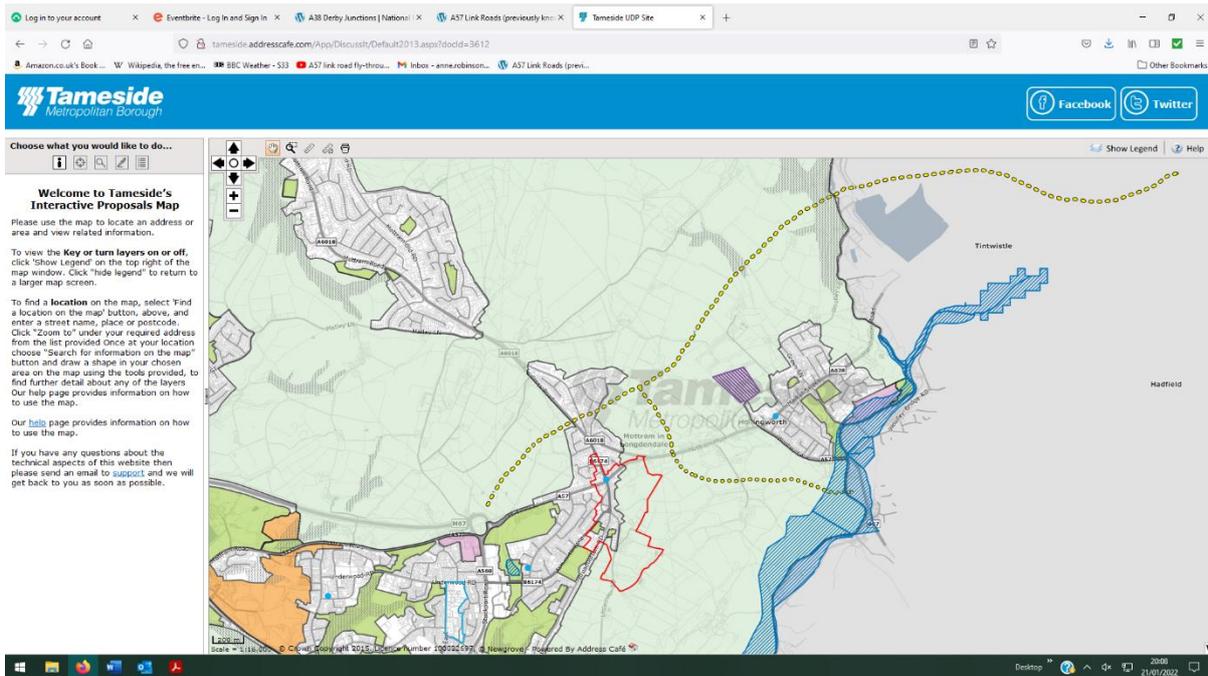
¹⁷ ES Ch1-4 Introductory chapters Table 2-1 & Table 2-2 cutting and embankment slopes; Figure 2.7 Engineering Drawings (cross sections); ES Introductory Figures 2.1-2.4 see 2.2 for chainage

uncharacteristic element and emphasise the linearity of the infrastructure. Post and rail fencing, hedges, lighting columns, signs, 2.5m 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. The single carriageway would also be raised above ground level for the majority of its length 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 smooth slope.

25. In conclusion, all the effects noted above would have a profound and substantial impact on the openness of the Green Belt.

26. NH admits that *the effects on the Green Belt would include the new highway, and its traffic, and associated structural features. These would introduce new built elements on land which currently does not have them.* It then claims (on the point of landscape, not openness) that the Scheme *'will not introduce completely new types of features within the overall landscape of the Dark Peak Western Fringe Landscape Character Area (DPWF), as there is existing highway infrastructure and development within the relevant landscape character area and, following mitigation, the magnitude of change is considered Negligible Adverse'*. We disagree. The Green Belt designation washes over Roe Cross Road and Mottram Moor where they lie within it, as it would over the new scheme. However, the existing roads and their traffic are, for most of their length, well contained within the settlements. This would be in contrast to the scheme which would be separate from the settlements and allow traffic to spill out into the Green Belt in a way that the existing roads do not.

27. NH was asked to comment on submissions that the scheme would cut the Green Belt in half. NH claims *'The area required for the Scheme is very small in comparison to the much wider area of land designated as Green Belt, and as such the Scheme is not capable of cutting the Green Belt in two'*. We agree that, in terms of total Green Belt area, the scheme area is small. However, we have copied the TMBC UDP proposals map below; the yellow dotted line indicates the line of the proposed Mottram-Hollingworth-Tintwistle bypass and Glossop Spur, which closely matches the line of the proposed development. To the east of Mottram where the scheme exits from the Mottram underpass and cuts across from Spout Green to Brookfield the scheme would separate ie bisect the northern and southern parts of the Green Belt in this locality. The scheme's route below Harrop Edge pastures also isolates a pocket of Green Belt – although the M67 roundabout lies in the Green Belt, it is a matter of only a few yards that keeps the Green Belt continuous here. We therefore maintain our view that the scheme would bisect the Green Belt, ie cut it into two parts and impose significant negative impacts, especially on openness.



Question 4.1c

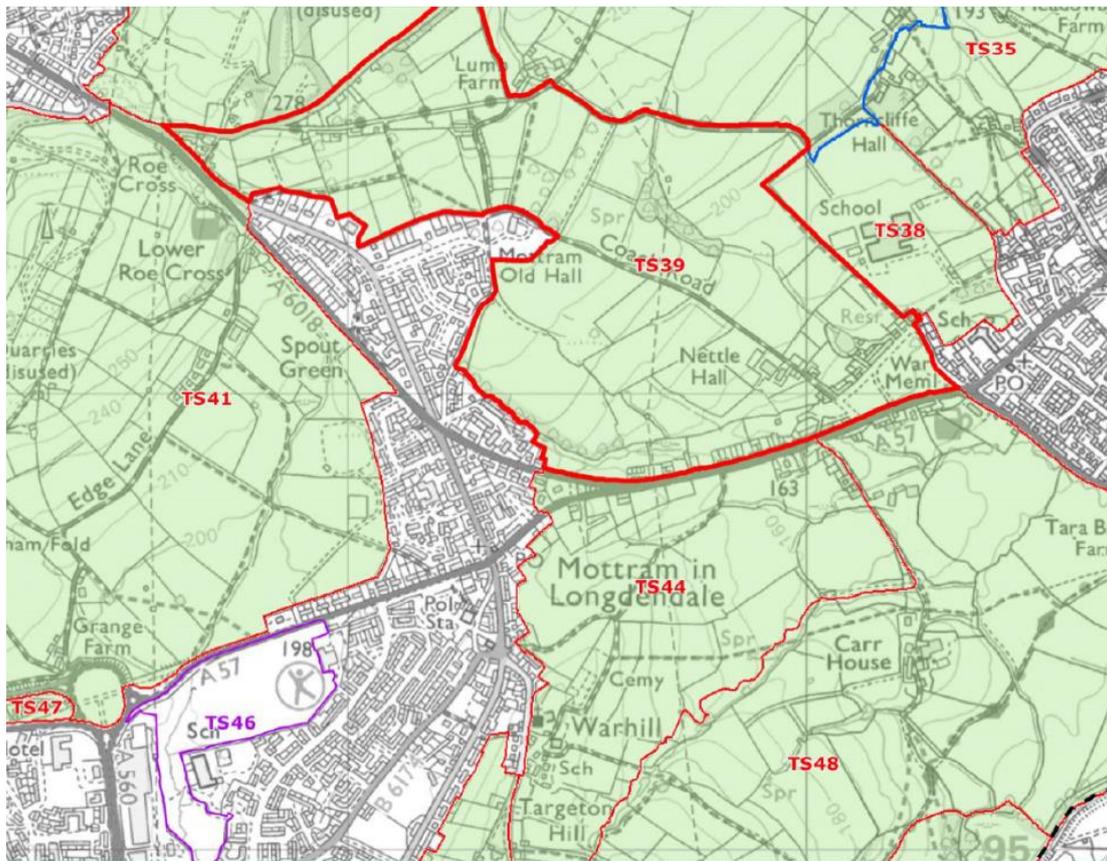
28. Q4.1c specifically asked Tameside to comment on the applicant's assessment of Green Belt. In its answer it determined *'the scheme as a whole could be determined to be appropriate development in the Green Belt provided that it preserves openness and does not conflict with the purposes of the Green Belt. Albeit the applicant also suggest that it is not unreasonable to suggest it meets one of the exception tests'*. It then refers the applicant to Greater Manchester's Green Belt Assessment.

29. We disagree with TMBC's assessment. The Greater Manchester Green Belt Assessment Table 4.27¹⁸ gives the performance for all parcels of land within Tameside against the first four roles of the Green Belt:

- a) Green Belt 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

30. With respect to the scheme the relevant parcels are TS39 to north-east of Mottram, TS41 to north of Mottram, TS 44 to east of Mottram and TS 48, adjacent to TS44 and extending the Green Belt designation to the Tameside eastern boundary. The map below focuses on one parcel TS 39 but shows all the parcels.

¹⁸ Greater Manchester Green Belt Assessment Final Report, LUC, 2016 and Appendix 4.9 Tameside



31. When assessed against the four Green Belt purposes all 4 parcels have a strong function, except for TS39 which has a moderate function in preserving the setting and special character of historic towns. This concurs with the assessment in CPRE's written representation. The scheme would impair all four purposes in all four parcels of the Green Belt

32. The single carriageway also cuts across the Green Belt in High Peak leaving a small isolated pocket to the north of the River Etherow bridge¹⁹. Here HPBC Policy EQ 4 applies. This seeks *'to protect the Green Belt and maintain its openness and permanence. Within the Green Belt, planning permission will not be granted for development unless it is in accordance with national planning policy'*.

33. In conclusion as the scheme is contrary to NPPF policy with respect to its impact on the four functions of the Green Belt and on the openness of the Green Belt, this weighs heavily against the scheme in the planning balance.

Question 4.2

34. We do not agree with NH's reasoning about 'any other harm'. We used the Court of Appeal judgement in *SSCLG & Others v Redhill Aerodrome Ltd (2014) EWCA Civ 1386* which confirmed that interpretation of any other harm in para 88 of the original NPPF is not restricted to harm to the Green Belt (see our written representation Table on pp 68-70).

¹⁹ Case for the Scheme revision deadline 2 Figure 7-1

35. NH argues that as the scheme is not inappropriate development it *'is not burdened by the presumption against inappropriate development and need not demonstrate very special circumstances nor engage in a weighing exercise of harm against such circumstances and any other considerations in favour of granting permission... The court case predates NPSNN ... An assessment of any other harm is already included in the Case for the Scheme and, when appropriately assessed, the benefits of the Scheme outweigh any adverse effects'*.

36. NPSNN para 5.164 refers to NPPF for more detail on Green Belt policy.

37. NPPF 2021, para 147 states that *'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.'*

148. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. '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

*150 Certain other forms of development are also not inappropriate in the Green Belt **provided they preserve its openness and do not conflict with the purposes of including land within it.** (our emphasis). Para 150 includes 'c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;'*

38. We do not agree that the scheme is appropriate development, as the dual carriageway is part of the SRN. NPSNN states that *'when located in the Green Belt national networks infrastructure projects may comprise inappropriate development'*. Therefore the requirements of para 148 apply and very special circumstances must be found for it to proceed.

39. The single carriageway could be considered 'not inappropriate' in the Green Belt, if the out-dated TMBC UDP is accepted as in-date on this matter. NPPF para 150 is clear that development that is not inappropriate has to preserve the openness of the Green Belt and not conflict with the purposes of the Green Belt. The single carriageway, like the dual carriageway, does not preserve openness, and conflicts with four of the five purposes, of the Green Belt. It is therefore inappropriate development and therefore very special circumstances apply.

40. The scheme would be a permanent development in the Green Belt and its traffic, comprising 30,000 vehicles per day, would further impact on openness.

Landscape – Response to Local Impact Reports and responses to ExA’s First Written Questions

Local Impact Reports

41. TMBC in its Local Impact Report page 46 and Table 11 Summary of Impacts concluded that there would be long term negative impacts on landscape in the operational phase of the scheme.

42. DCC/HPBC in its Local Impact Report (10.21-10.27) considered that the *‘proposed planting appears to map the route of the road rather than responding to the particular landscape that it passes through’* and integrating the route into the small-scale field pattern is difficult. It expressed concerns about the impact of increased traffic on the Glossop townscape, and on tranquillity and visual amenity within the National Park. It is also concerned about the impact of key elements of mitigation, *‘such as the attenuation pond and flood compensation close to the River Etherow which may be particularly prominent from the Melandra Roman Fort’*.

43. The PDNPA in its Local Impact Report 8.2 (and also in its answers to Qs 5.7, 5.14, 5.15) finds that the baseline for the assessment has not been adequately defined. In addition with respect to indirect effects of traffic, *‘the assessment methodology dismisses the potential significance of lower magnitudes of effect without giving them adequate consideration’* (answer to Qs 5.15 and 5.17). This applies to both landscape and visual amenity. The Tintwistle Conservation Area, already badly affected by traffic, would not be enhanced by the increased traffic which would harm the setting of the Conservation Area and how it is experienced by people.

44. We agree with all these concerns.

Responses to the ExA’s first written questions by NH, local authorities and the PDNPA Question 5.1

45. This asked for commentary from the applicant on the implication of changes to NPPF with respect to landscape and visual effects. We agree that the NPPF and its design guides have accentuated the importance of beauty and sense of place. NPPF 174 continues to recognise, as it did previously, *‘the intrinsic character and beauty of the countryside’*. However, NH has omitted that NPPF 2021 para 176 now refers to the National Park setting. As the scheme lies within the setting of the PDNP this is an important policy consideration.

*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while **development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.** (our emphasis)*

46. Having dismissed NPPF and its accompanying guidance on design, NH instead has assessed the scheme using 'The Road to Good Design' 2018²⁰. This has 10 design principles - makes roads safe and useful; inclusive; understandable; fit in context; restrained; environmentally sustainable; thorough; innovative; collaborative and long lasting. In our view the scheme fails against the majority of these principles. It does not respond to the sense of place or enhance the environment; it does not respect the sensitivity of the local landscape, its heritage or the local community. It *'builds a legacy for the future'* of increasing car dependency leading to increasing ill health and impoverished well-being; increasing GHG emissions and pollution; and increasing crashes. There has been no effective engagement on design; nor does it help the locality to mitigate and adapt to climate change -, rather it hinders it. It also fails against the design principles for NSIPs (see response to NH's answer to Q5.23 below).

Question 5.3

47. We agree with the PDNPA that dark skies have not been adequately assessed. The roads and their traffic will be seen as a ribbon of light separate from the settlements, reducing tranquillity and the dark.

Question 5.5

48. This is concerned with visibility, levels and limits of deviation, and height and density of planting. According to NH's answer to 5.5a) *'Changes to existing ground levels due to the proposed development have not been taken into account for this assessment and will be modelled in detail at Detailed Design stage'*. An additional height across the whole scheme of 4.5 metres to simulate HGV traffic visibility was added. This approach is unsatisfactory as assessment of the impacts of the scheme on landscape and openness of the Green Belt, visual amenity, and noise will have been underestimated.

49. The dual carriageway would be raised up to 4.7m above existing ground level for most of its length²¹ west of the Mottram underpass and would be raised on an embankment 7.5m as it approaches Mottram Moor. The single carriageway would also be raised above ground level for the majority of its length by between 2.6m and 4.8m. These are substantial heights which would increase the visibility of the scheme from both near and distant views. The applicant should now show what impact adding the changes to existing ground levels would have on landscape and visual amenity, on openness and on noise.

Question 5.5f) queries the effectiveness of the screening by vegetation.

50. We disagree with NH's assessment - *'Even in the winter, deciduous trees and shrubs will deliver a degree of screening provided by their dense stems and tracery which will improve with every year of growth'*. According to the diagrams of the scheme layout and cross sections of the roads, dense tree stems would be below the top of the earth banks and their tracery would thin towards the top of the banks, therefore high vehicles would be visible. A considerable length is only by edged by hedges which would provide no effective screening.

²¹ 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

Question 5.8 public perception of landscape value

51. NH provides no evidence to show that the value the local community places on the landscape was properly considered, as is required by the European Landscape Convention²².

Question 5.11

52. We note that in response to a consistency check, a number of significances have changed from neutral to slight adverse. This adjustment fails to recognise the severe adverse impacts of the scheme and its traffic on landscape and visual amenity, and on enjoyment of the countryside.

Question 5.13 How has the applicant taken into account the special qualities of the PDNP?

53. NH's answer confirms our view that it has not taken the wildness, tranquillity and scenic beauty of the National Park into account in its assessment of the traffic impacts of the scheme. The A57 Snake Pass and the A628T cross the wildest parts of the Dark Peak, also designated Natural Zone by the PDNPA, with few obvious signs of recent human activity and offering the visitor a sense of wilderness. These attributes are strongly protected by National Park purposes and in the PDNPA Core Strategy; increasing traffic would impact adversely on them. We support the PDNPA's dissatisfaction with the approach.

Question 5.15 outstanding landscape impact assessment concerns

54. We support the PDNPA's request for '*A more refined study area, a more detailed methodology and assessment process where judgements are explained and justified is required by the applicant so the potential significance of indirect effects can be adequately considered within the decision-making process*'. This is to address the inadequate assessment of the indirect impacts of traffic on the National Park.

Question 5.19 Outstanding visual assessment concerns

55. We support the PDNPA's request for '*A more refined study area, a more detailed methodology and assessment process where judgements are explained and justified is required by the applicant so the potential significance of indirect effects can be adequately considered within the decision-making process*'. This is to address the inadequate assessment of the indirect impacts of traffic on the National Park.

Question 5.20 Good design of key elements (underpasses, junctions, bridges and landscape)

56. NH's answer to this question merely describes an ideal situation which is not rooted in any detailed plans or diagrams available for scrutiny. It is unacceptable that no detailed design for the scheme as a whole and all its key elements would be available until after the DCO is approved. It is astonishing that NH can address detailed design of street furniture, such as seating ('*chosen for comfort regarding back and arm rests to cater for all ages*') and artificial lighting, yet cannot supply the materials for the wingwalls of the underpasses.

Question 5.23 Design Principles for National Infrastructure

57. NH claims that the scheme meets the Design Principles for National Infrastructure²³. It does not, as we explained in our written representation. The principles require the applicant

²² See CPRE Written Representation pp71-72 paras 4.7.5-4.7.6

²³ [REDACTED]

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 of our written representation. 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’.*

58. 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 bridleway²⁴ 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 impacted 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.

Question 6.2 Impact on Tintwistle Conservation Area

59. We support the PDNPA’s concerns expressed in its answer to this question. Traffic levels through Tintwistle would increase by 10% in 2025 and by 11% in 2040 with the scheme in comparison to do minimum in 2025²⁵. As we have shown above these traffic levels are contrary to all the relevant policies.

²⁴ Draft DCO Schedule 1 Work No. 14 deadline 1 draft

²⁵ NH answers to ExA’s First Written Questions Q7.15 page 90

Climate Effects - Response to National Highways Answers to Questions

Question 8.1b) Any other relevant policy or legislation to consider?

60. In its answer NH has omitted several key policies/strategies against which the scheme should be assessed - the UK's Nationally Determined Contribution; the UK's Net Zero Strategy 2021; Transport for the North's 2021 statutory Decarbonisation Strategy²⁶ which has a target of Net Zero by 2045 (reflecting local and combined authority consensus across the North); Greater Manchester's Places for Everyone which is aiming for carbon neutrality by 2038. Assessment of the scheme against all these policies/strategies should be required alongside the emerging climate plans of local authorities.

61. In response to this question NH refers to the requirements of the DfT's Decarbonising Transport Plan (TDP) and concludes '*the Applicant's position is therefore that the commitments presented in the TDP do not have any implications for the Scheme or the conclusions on significance presented in the Environmental Statement*'. This is an untenable position for NH to take and we disagree with it. The development would lie on the edge of Greater Manchester urban area and is part SRN (dual carriageway) and part local road (single carriageway). Its traffic interacts with traffic on all the local roads and the wider SRN network in Greater Manchester. The scheme's assessment should therefore be subject to the Plan, both the proposed trajectory for carbon emissions reduction (using both upper and lower limits of that trajectory) and the policy measures. It is clear that the Government is expecting substantial traffic reductions in urban areas and is not just relying on electrification of vehicles.

- Page 6 '*we must make public transport, cycling and walking the natural first choice for all who can take it. 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.*'
- Pages 6/29 '*We want to reduce urban road traffic overall. Improvements to public transport, walking and cycling, promoting ridesharing and higher car occupancy, and the changes in commuting, shopping and business travel accelerated by the pandemic, also offer the opportunity for a reduction or at least a stabilisation, in traffic more widely.*'
- Page 21 '*We have seen an increase in cycling and walking as a result of the pandemic and want to further embed and encourage more sustainable travel habits. While the reduction in use of public transport has been a short term necessity, we want to ensure a speedy return to public transport*'
- pages 53/56 '*By 2030 We will aim to have half of all journeys in towns and cities cycled or walked*'

62. In taking the stance it has, NH is fulfilling neither its licence conditions (which have high expectations of NH: see foreword to the licence, CPRE written representation p19) nor the requirements in RIS2 pages 38-39 (which seeks '*to reduce situations where people are dependent on a single SRN link, and instead find other transport options, whether other roads or modes, to address this*'). In NH's own words in answer to Q3.14 '*No specific*

assessment of the effect of the Proposed Scheme on public transport journey times across, and within, the study area has been undertaken. With respect to physical activity there is a neutral impact. NH state that *'Small increases in active mode trips are to some extent counter-balanced by some walking and cycling trips moving to private modes. As a result, no impact to physical activity is expected as a result of the scheme'*²⁷. We think it is more likely that traffic would increase and with it the sense of intimidation by vulnerable road users, leading to a negative effect on active travel. Therefore the scheme does not contribute to one of key goals of the DfT Transport Decarbonisation Plan – accelerating modal shift to public and active transport.

Questions 8.1c) Any other carbon budgets/reduction targets to consider?

63. In answer to this question NH maintains that the only relevant assessment of the scheme's emissions is against national carbon budgets. Clearly this is not a tenable position as the Secretary of State is asking questions that indicate he is seeking assessment against other carbon budgets²⁸ – see our answer to 8.1d) below. NH is ignoring NPSNN 4.4 which requires *'environmental, safety, social and economic benefits and adverse impacts, should be considered at national, regional and local levels'*. The EIA Regulations guidance requires *'The assessment should take relevant greenhouse gas reduction targets at the national, regional, and local levels into account, where available'*²⁹. In the Government's Transport Decarbonisation Plan sub-national, combined and local authorities are seen as an integral part of the national effort to meet climate targets in order to harness their strengths and expertise³⁰. NH is also ignoring the Net Zero Strategy, which makes *'quantifiable carbon reductions a fundamental part of local transport planning and funding'*.

64. 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. The Net Zero Strategy and TfN's Decarbonisation Strategy both provide trajectories specifically for transport emissions and the scheme should be assessed against both. HPBC's aim of Net Zero by 2030 is considered to be in jeopardy (Local Impact Report, 17.17-17.27) – the scheme should be assessed against this target.

8.1d) Should any UK case law/court judgements be identified?

65. We disagree with NH's answer. In our written representation we referred to two court judgements that are of relevance – the Stonehenge ruling³¹ which provides cogent arguments as to why an options appraisal can be challenged through the Examination process; and the A38 Derby junction which, following the quashing of its DCO by the High Court on 8th July 2021³², must now be redetermined. In order to do so the Secretary of

²⁷ CPRE submission of NH documents

see page 57 out of 90 - A57 Economic Appraisal Package Table 5-14

²⁸

²⁹ Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report – European Union, 2017

page 41

³⁰ Decarbonising Transport, A better Greener Britain, DfT, 2021, pages 40 and 151

State asked questions³³ that he is now asking of other proposed developments³⁴ (A1 Morpeth³⁵; M25J10/A3 Wisley; M25 J28 Improvements). The ExAs of the A428 Blackcat to Caxton Gibbet Road Improvement Scheme³⁶ and of the A47-A11 Thickthorn Junction³⁷ have now followed suit. Both have issued a Rule 17 request for further information from NH on the cumulative effects of GHG emissions from the Proposed Development, as follows.

'The Examining Authority (ExA) invites the Applicant to provide its assessment of the cumulative effects of Greenhouse Gas emissions from the Proposed Development 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 budgets where they exist (including the carbon budgets, the 2050 net zero target under the Climate Change Act 2008, 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. The ExA would also welcome confirmation that the response to all parts of this question has been prepared by a competent expert. Please provide all documents referenced, highlighting relevant paragraphs or sections, and their relevance fully explained.'

66. We believe asking for this information with respect to this scheme is necessary to fulfil policy requirements.

Question 8.1e) Does NH have any carbon reduction targets?

67. In our written representation page 48, para 4.9³⁸ we proposed that NH assessed the carbon effects against its own Highways Plan. This it should do. Its proposed trajectory for carbon reduction is broad so the assessment needs to be made against both the upper and lower limits of the trajectory.

Question 8.2 Compliance with international obligations?

68. NH believes that international obligations are covered by the amendment in June 2019 the Climate Change Act 2008 to set the overall legal reduction targets by 2050 to at least a 100% reduction in net emissions against 1990 levels, i.e. achieve 'net zero carbon'. This

[REDACTED]

position fails to recognise that, since that amendment was made, the urgency and imperative with which carbon emissions need to be reduced has accelerated. This has been recognised by Transport for the North's statutory 2021 decarbonisation strategy, the 2021 IPCC Sixth Report, and the 2021 October UK's Net Zero Strategy Build Back Greener. '*Rapid and deep cuts to emissions are essential to avoid the most dangerous impacts of climate change*' (UK Net Zero Strategy p. 363). Most recently the UK Climate Change Risk Assessment 2022 was presented to Parliament on 17 Jan 2022. Its evidence indicates that '*we must go much further and faster to truly prepare for the impacts of a warmer world... There is strong evidence that even under low warming scenarios the UK will be subject to a range of significant and costly impacts unless significant further action is taken now*³⁹.'

Question 8.3a-e

69. We disagree with NH's claim that only a comparison with national carbon budgets is relevant. The UK is not on track to meet the 4th (2023-2027), 5th (2028-2032) or the 6th (2033-2037) carbon budgets⁴⁰. The UK's 6th budget⁴¹ requires a step-change in carbon emissions reductions (78% reduction by 2035, compared to 1990 levels; contrasted with 51% for the 4th budget and 57% for the 5th budget) in order to address this projected failure to meet the 4th and 5th budget. 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. With uncertainty over achievement of UK carbon budgets other assessments must be used.

70. There are sectoral targets and trajectories for emissions reduction for transport in the UK Net Zero Strategy and in TfN's statutory Decarbonisation Strategy, both of which should be used to assess the scheme.

Question 8.4

71. NH claims that assessment of scheme emissions against other local targets and projects is not required; and that its assessment of cumulative GHG '*is inherently cumulative because it considers embedded construction and maintenance, and user tailpipe emissions and the cumulative assessment of different projects (together with the project being assessed) is inherent within the climate methodology (through inclusion of the project and other locally committed development within the traffic model and consideration of the project against the UK carbon budgets, which are inherently cumulative as they consider and report on the carbon contributions across all sectors)*'. Our answers to question 8.1b), c) and d) above refute this approach.

72. The assessment of scheme emissions on a geographical basis is difficult (a) due to lack of definition of the study area for analysing carbon emissions and (b) as the apparent assessment area is not coincident with the geography of measuring emissions, ie local authority areas. At its periphery the Area of Detailed Modelling includes small parts of a number of local authority areas – Sheffield, Barnsley, Derbyshire Dales, Oldham - but its

³⁹ UK Climate Change Risk Assessment 17 Jan 2022, page 4 second para & page 7 third para;

⁴⁰ Sixth Carbon Budget, Climate Change Committee, Dec 2020;

⁴¹ Reducing UK Emissions Progress Report to Parliament, Committee on Climate Change, June 2020

⁴¹ Sixth Carbon Budget charts and data in the report Advice Report Ch1&2 tab, row 238.

core appears to consist of large parts of Tameside, High Peak Borough and Stockport, and half of Kirklees. The boundary for the emissions' study needs to be reset in order that impacts on all the local authority carbon budgets can be assessed.

Question 8.14 Have appropriate carbon-reduction measures been secured for the operational phase?

73. We disagree with both NH's and TMBC's affirmative answer (*'The bypass should succeed in delivering/demonstrating a reduction in traffic, an increase in the uptake of alternative modes, behaviour change, energy efficiency, enhanced natural capital.'*). There would be no traffic reduction as required by Greater Manchester's the Right Mix⁴² and the DfT's Decarbonising Transport Plan; the new facilities for walking, cycling and equestrians make no impact on physical activity; NH cannot claim the scheme makes public transport more reliable as it has not considered its impact (see NH answer to Q3.14). There will be no behavioural change as reducing congestion and providing more road capacity without demand management will reinforce car dependency. Repeated pilots and investments have shown that modal shift is minimal and not sustained without demand management of car use. Car dependency must be disincentivised by fiscal constraint or by disbenefits such as reduced road capacity and slower speeds, or else congestion and journey length will continue to increase.

74. Finally, it takes years to replace the existing cars on the road⁴³. Even taking account of the Government's new target of ending sales of all new ICEs, creating additional road capacity would lead to increases in GHG and PM up to and beyond 2030, as TMBC recognises in its answer to this question.

Question 8.16

75. We agree with TMBC's outstanding concern that *'it is challenging to understand how having possession of the facts in terms of the deleterious effects of passenger car transport and road freight on both GHG and other emissions (e.g. particulates) – that the delivery of a road scheme that increases the volume of traffic in a given location will do anything other than increase carbon emissions (additionally the CO2 emissions of delivering the actual project and the loss of natural capital).'*

⁴² Greater Manchester Transport Strategy 2040 Appendix 1: The Right Mix Technical Note

[Redacted]

⁴³ [Redacted]



Air Quality – HPBC Answers to ExA’s First Written Questions

Question 7.6

76. We share HPBC’s concerns about the exclusion of the AQMAs for Tintwistle and Dinting Vale from the air quality study, also expressed in its Local Impact Report para 8.46⁴⁴. Results for both AQMAs should be presented.

⁴⁴ [REDACTED]