

**dDCO submissions JJ & WE Bower,
C. Bower & Sons Ltd and CS, JJ & WE Bower
JJ & MJ Bower([REDACTED]**

Introduction:

[REDACTED] was purchased by my great grandmother on 25th July 1919 and has been farmed and expanded by subsequent generations, with more substantial expansion occurring over the last 50 years or so. What started off as 62 acres now amounts to 200 acres or thereabouts of which approximately 175 acres is workable. The remainder is occupied by the farm houses and buildings, access tracks, water, stream valleys and banks as well as various woodland, both natural and planted. The farm and business benefits enormously from having all its buildings in a central location within a ring fence, as can be seen on the attached plan which benefit will be lost by the construction of the proposed road as planned. This loss will be felt in terms of inconvenience of access to the severed land, both for moving and managing cattle as well as extra time and increased fuel costs for tractor and machinery access to the severed land. Furthermore, on both sides of the proposed road some fields will be disrupted in such a way as to leave them all but impracticable for the use of modern agricultural machinery.

This is the third incarnation of a road scheme across our farm in the last twenty years or so. From memory, which may be flawed as to intricate detail, the first scheme allowed for one lane of traffic towards Glossop and two away from Glossop: now, with considerably increased traffic – and more to come given the ongoing and planned development within and around Glossop – a smaller scheme is considered adequate. This defies common sense. The current proposal is also the worst from our perception in that it is closer to the farmhouses and buildings than previous schemes for reasons which have never been adequately explained: this has certainly increased the number of size disrupted fields as referred to in the previous paragraph.

Using the figures as calculated by National Highways, during construction we will lose approximately 20% of the workable area of the farm, ie. 33 of 175 acres. When construction is concluded we will have a net loss of approximately 13%, or 23 acres. On the one hand this does not appear to be of considerable consequence but when the ‘impracticable’ plots are added back this figure approaches some 30 acres. Of course, given that at this late stage detailed design has still to be concluded, these figures may well increase. The applicant may argue that these ‘impractical’ pieces of ground could be used for grazing and, indeed, they could. However, they will not support any large numbers of stock which will result in greater rotation of stock around different fields, all leading to increased management time and cost. In particular, a severed piece to the north of the new road on land belonging to C Bower & Sons Ltd – the remains of field no 5663 - will only be suitable for grazing: the remaining fields in this severed section are mainly used for mowing so grazing stock will have to be moved more frequently back to the non-severed portion. Given the relative complexity of the new access arrangements to the severed portion, in relation to the systems and tracks currently in place which allow for one man to move groups of cattle in relative ease, this will be a substantially more complex task certainly requiring extra labour at the very least and causing inconvenience to foot and vehicular traffic on Carr House Lane. Some calculations have been made of relative distances from the farmyard to field entrances before and after construction with the after figures in bold:

Farmyard to field 5663: 501 m **768 m**

Farmyard to field 6471: 655 m **824 m**

Farmyard to field 3976: 316m **523m**

Much of the above may also be applied to plot 5/1e, the small portion remaining of field 0865 to the south of the new road. A new means of access to this piece will also have to be devised somewhere opposite point C. Even more concerning will be our inability to access field 8845 with tractors and machinery during the construction phase because the gates at point C will be within the temporarily occupied area: the only other means of access to this field is for livestock only off a slope which is impracticable for tractors and machinery. With no ability to 'feed' the ground grazing production will be diminished.

The net loss of ground will have an effect on the future of the business in terms of either the number of cattle kept or the amount of 'cash crops' produced on the farm. The virtual complete loss of field no 8867 means that another field currently used for cropping will have to be converted to grazing and the reverse is true of field no 0865. The severed remainder of 0865, to the north of the new road, could be used for grazing but, again, as noted in the paragraph above, for short periods of time only. Another factor to consider will be the provision of drinking water to the severed portions. This is currently bore hole water from our supply pumped to various strategically positioned troughs. To replace the current network of pipes will entail a new pipe from our bore hole, located at A on the enclosed plan, to and through the Carr House Lane underpass and branches off that to the severed portions. It may be more convenient to make a new connection into the water mains at B on the plan, but this negates the benefit of utilising water from our own source which is considerably cheaper than purchased water. Of course, this is a matter which can be agreed with the applicant in due course but is nevertheless worth bringing to the ExA's attention in terms of interference and cost implications.

Reference was made above to 'cash crops' which includes hay and haylage sold locally into the horse leisure market. This accounts for approximately 40% of net income, with livestock sales accounting for a further 40% and sundry income at 10%. An initial estimate suggests income could be reduced by 25% overall. Add to this increased costs in terms of time, fuel and manpower the effect on the bottom line will be significant. A choice would have to be made between reducing cattle numbers or reducing cash crop acreage, given that a proportion of workable land is required to produce enough fodder to feed the herd through a 5-6 month winter. These are decisions which have not yet been made: given the history of proposed and abandoned schemes in this area over the last 60 years or so we have learnt that time may be on our side as to the finite detail. We have to continue to run the business as though the scheme will not come to fruition and make investment decisions accordingly.

Plots 5/1k, 5/7b, 5/8, 5/7c, 5/6d and unassigned plot between 5/1k and 5/7c

Why are these plots required on a temporary basis? We assume that all plots genuinely required on a temporary basis will be leased on a commercial basis.

Plot 4/13b

This plot contains a stream – it is not a river, as referred to by the applicant - which will be diverted due to the construction of an attenuation pond: we understand that this dog leg is necessary because of insufficient fall to culvert the stream more directly under the road. Having studied Section 10 of APP012 this reasoning appears to be flawed. However, given that this new stretch is to be culverted under the footpath diversion it seems reasonable that it could be culverted completely under our retained ground. This would have the double advantage of: wasting less ground and, less

future maintenance in terms of bank erosion, de-silting and weed control. There are two deeper culverts under Mottram Moor nearby and another under the former gas works site adjacent to Woolley Lane so local precedent is well established. It is also noted that the stream on the other side of Mottram Moor will be completely culverted.

In this area we have concerns about the land being lost to the false embankments designed to 'hide' the road. Section 10 shows a bund width of 17.96 metres to the south – given that the carriageway surface here is at existing ground level and, that neither the cattle or sheep in the adjacent fields or the occupants of Mottram Cemetery will be particularly disturbed by the new road, this appears to be unnecessary. A well-designed planting scheme will achieve the same effect at much reduced cost in financial and carbon terms. It is worth pointing out that in field 0865 the bund has been removed in order to facilitate access to field 8845 at point C. Unfortunately, no Section drawing is publicly available for this area. It is also apparent from other Section drawings that a considerable area of land is to be lost in the attempt to hide the road from the horizontal viewpoint, particularly at Section 13 where the bund width will be 6 metres wide and the associated reverse slope some 17.77 metres wide on the south side. Furthermore, has the applicant had regard to the considerable research carried out when the M6 through the Lune Gorge and across Shap, as well as the M62 across the Pennines, were designed? Careful consideration was given to offsetting the effects of snow accumulation through infill and drifting: it is quite clear that the current proposals on this scheme, specifically the use of artificial bunds, do not take these matters into consideration. We can inform the ExA from considerable experience that a section of [REDACTED] with similar characteristics very rapidly fills in with snow.

Section 11 highlights another concern we have regarding the provision of open drainage ditches along both sides of the proposed road. These appear to have been placed an average of 8 metres from the base of the bunds which seems ludicrous if, as we presumed, they were intended to collect surface water from the bunds. Sections 13 and 14 show these ditches on the north side to be higher than the base of the bunds so clearly this is not the case so we must question what these ditches are for? We have previously suggested that these ditches should be replaced with perforated drains, at least 450mm diameter, with the trenches backfilled with gravel. This will save ground and deal with the issue of maintenance, particularly in terms of weed control. It is most unlikely that the applicant will prioritise injurious weed control on the sides of these ditches adjacent to our retained ground, given their apparent unwillingness to do the same on their own ground up and down the country. We will also wish to reserve the right to place field drains into these drainage channels or pipes, both as a result of severance of existing drains and the need to lay new drains in the future.

It is noted that in Sections 13, 14 and 15 the bunds are single slope (except to the south in Section 13) but that the landscaping now encroaches onto the non-disturbed land at the base of the bunds! So, again, ground is being taken unnecessarily. Reference was made to 'a public body seeking to make best use of public resources.' Using public money to buy scarce land unnecessarily is not making the best use of that money, the works proposed on that land are an unnecessary use of energy and are, arguably, an abuse of the compulsory purchase powers and hence our human rights.

Access to [REDACTED].

The provision of access is an ongoing debate, and it is noted that we are being presented with an 'either or' situation regarding the height of the underpass as opposed to the provision of alternative access directly off the new road. This appears to be a cost issue from the applicant's side, whereas we have to ensure that we still have unrestricted access to a full range of commercial vehicles. We feel that at point D it will be necessary to pile adjacent to Carr Brook in order to provide sufficient

sweep into and out of the underpass: we acknowledge the design work and computer modelling carried out by the applicant but feel, from experience, that the current design is not meeting our reasonable requirements. We assume that the existing field access track in plots 5/1j and 5/7d will be brought up to standard as part of the construction process.

It also clear that the proposed access road across our low-lying land is using a lot of ground and it would be preferable to connect straight in to the existing track at point E. It will be noted that the underpass will also need to be used for the redirection of electricity and telecommunications cables supplying our properties as well as others on [REDACTED], along with redirected water supplies as mentioned earlier.

We have pointed out to the applicant the need for attenuation of surface water run off from the whole of the 'new' Carr House Lane in the underpass area into Carr Brook, again at point D.

We have also requested the applicant to investigate the dimensions and condition of the culvert under Carr House Lane at point F. Obviously, with the new attenuation pond adjacent to Mottram Moor and the new drainage ditch to the north of the new road emptying into this stream, the volume of water at times of higher rainfall will be substantially in excess of anything the culvert has had to deal with to date. Clearly any replacement work to this culvert has implications to the access to our property.

In previous discussions with the applicant we have suggested that a 'yellow box' at the junction of Carr House Lane and Mottram Moor be provided as part of the scheme. The justification for this is simple: the new traffic lights at the Mottram Moor junction will result in two solid lanes of traffic uphill for long periods during the day. Currently it is the inside lane which is solid and with a few courteous, considerate drivers it is possible to exit right in a reasonable manner. Post construction will be a different matter. Furthermore, with the downhill side of Mottram Moor being reduced to one lane vehicles wishing to turn right into Carr House Lane will be sat waiting in the single downhill lane delaying traffic behind. This would problem would be eradicated with the provision of a 'yellow box'.

Plot5/6a

This is classed as 'land to be used temporarily' but is also proposed as the new access track to our severed land to the east of Carr House Lane and north of the new road. Clearly there is an anomaly here and we have particular concerns as to who will retain the freehold of this access track upon scheme completion. We will not wish to be left in a less secure position than we currently enjoy with regards to access to this block of land. In connection with this the attention of the Exa is drawn to the length of new track which will need to be constructed from this point to reach field 6471 and the remains of field 5662, an estimated length of 250 metres.

Plots 5/1f, 5/1j, 5/7d, 5/7f, 5/9d: why is it necessary for 'rights to be acquired permanently' on these plots, and what are these rights?

Landscaping

Clearly there is a difference of opinion between professionals as to the type of planting required. We would suggest careful examination and replication of the natural growth of mixed species – oak, holly, ash, birch etc - along the small valley of Carr Brook which lies to the immediate south of the proposed road. We do not accept the need for planting of any kind on the land at the base of the false banks as exemplified in Section 13 and Section 14. We would advocate the use of planting in place of the bunds along the side of the road. On the other hand, the M6 through the Lune Gorge

appears to blend in well with the landscape without any bunds, false embankments or forced planting/landscaping. So, why is what worked 50 years ago so unacceptable now? Indeed, a careful study of the existing ground level to the south of the new road in Section 10 and 11 suggests that the areas proposed for bunds could be returned to agriculture so a mixed hedgerow against the proposed bridleway would be sufficient here.

Save for two relatively short lengths of 'untrimmed native hedging', what appears to be missing over the entire length of the scheme is any significant hedgerow planting, which would fit in well with the planting we have done over many years. Surely the applicants' consultant has noticed the extent of hedgerows in the wider area on our land? Apart from sound ecological reasons hedgerows planted at the same time as the installation of the highway boundary fence will have grown to be stock proof fences by the time the post and rail fencing has begun to rot away. Untrimmed hedging is not in keeping with that which exists and is useless from a stock retention angle. Incidentally, who would be responsible for the maintenance of these considerable lengths of new boundary fence?

We do not accept the 'moderate adverse' classification applied to the visual effects of the scheme as viewed from [REDACTED]. If you stand in the middle of the farmyard the scheme will not be seen, but from many other vantage points it will be very visible and intrusive.

As far as the visual impact of the road from a much wider perspective is concerned it would appear to be minimal when compared with the existing roads, volume of housing of all classifications and modern industrial premises within this part of the Longdendale Valley. Certainly, there are a number of industrial buildings between Hadfield and Tintwistle which are very visually intrusive.

We have noted that plans have been provided showing lengths of hedging and trees which require removal. We expect that younger trees will be removed in such a way that they can be replanted and not merely discarded.

Lighting

Notwithstanding that this is a semi-urban area is it appropriate for there to be lighting on a speed restricted road which passes through open countryside?

Severed footpaths

There are two footpaths to the north of the new road and immediate south of Tara Brook Farm which will need to be extinguished. The reason for this is that they will be severed by the new road and will lead nowhere. It is probable that there will be some vociferous resistance to this by lobbying groups but, from our experience, footpaths which go nowhere inevitably lead to trespass and damage. We fear that there will be a substantial amount of incursion onto our retained severed ground in any case simply because it will be severed and under less scrutiny by ourselves.

Access track to former Hollingworth STW

We question the need to compulsory purchase the section of track between points G and H on the plan, especially given that the access to the attenuation pond is from the new access track. Again, we have to be certain of not being left in a diminished position regarding control of access to retained ground and note that the current right of access through Tara Brook Farm, which will be extinguished and replaced, is 'unrestricted' in all respects.

Also, in this area we are particularly concerned that the 'issues' at point H are not interfered with in any way during or after construction. This is the outfall for a number of substantial field drains from our property.

It is a fact that this proposed road is a like for like replacement of Woolley Lane and, given the relocation of the traffic lights from the middle of Mottram to the new junction on Mottram Moor combined with the removal of the restraining influence of the traffic lights at the Gun Inn and the Woolley Bridge junction, the new road westbound will become even more congested than Woolley Lane at present. The effects on traffic flow into and through Glossop need no further discussion here. Of the 23 acres that we will lose it would appear that perhaps a third will be under tarmac while much of the rest will be used for 'mitigation' purposes which seems to be a scandalous waste of an ever-decreasing amount of viable agricultural land in this country. When the Victorian entrepreneurs were building railways and other substantial structures with their own funds they did not buy any more land than was absolutely necessary to complete the projects needed and yet, today, where public money is concerned, it appears to be 'the more the merrier' as far as land take is concerned. We hope that the ExA will be in the vanguard of turning this policy round.

