A57 LINK ROADS

TR010034

DEADLINE 5 FEBRUARY 23rd 2022

RESPONSES TO DEADLINE 4 SUBMISSION

Comments on Issue Specific Hearing 2 February 9th and 10th

CPRE Peak District and South Yorkshire Branch

Unique Reference: 20029243

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future
Registered Charity No.1094975 Registered Company No. 4496754

RESPONSE TO ISH2 SUBMISSIONS MADE TO DEADLINE 4

Item 2 Noise on footpaths

1) The assessment in the table and the map of noise contours confirms our statement that the tranquillity in the vicinity of the scheme would be substantially harmed and local amenity impaired for those using the footpaths.

Item 3 Traffic Modelling

2) In Item 3a), *'National Highways understands that the local highway authorities are broadly in agreement with the traffic modelling, but they have some outstanding queries on specific outputs which are under discussion. There is less agreement on the traffic modelling with some other interested parties, especially CPRE'*. As NH revealed in the ISH2 Transcript (page 14, 56.30) there was no independent assessment of the traffic modelling – all the assurance was done internally between the consultants and NH as the client. DCC may be broadly satisfied but admits there are imperfections (REP4-010) and that more detail would have been preferable for Glossopdale (ISH2). It would be helpful if DCC would list the imperfections so we can all understand what the issues are.

3) We have submitted a rebuttal of NH's response to our written representation REP2-069, and Appendices A and B (REP2-070 and REP2-071) for Deadline 5. This demonstrates our fundamental disagreements with the modelling undertaken for the scheme. We quote two examples of previous modelling work by NH to demonstrate why we have a lack of confidence in the current modelling work. These are taken from the Statement of Case and Proofs of Evidence presented by the Highways Agency to the Mottram-Hollingworth-Tintwistle bypass public inquiry in 2007.

   (i) In 2007 the Highways Agency (now NH) forecast that by 2015 with or without the Mottram-Hollingworth-Tintwistle Bypass there would be no exceedances of NO2. Yet here we are in 2022 with severe exceedances persisting, because the forecast was wrong. The assumption that vehicle technology would solve air pollution has proved to be hollow. The same may apply to today's assumptions – EVs may not solve air pollution or may be so delayed in their uptake that air pollution impacts continue.

   (ii) Similarly Highways Agency's traffic forecasts for the Mottram-Hollingworth-Tintwistle bypass also proved to be wrong. In 2001 on Mottram Moor there were 4,070 HGVs or 11% of 37,000 AADT. Although overall volumes of traffic were forecast to change slightly, the proportion of HGVs on the route was forecast to increase at a higher rate. In the DM scenario modelled for 2015 on Mottram Moor HGVs were forecast to number 4,500. The proportion was forecast to increase between 2015 and 2030 from 11% to 13%, or from 4,500 to 5,000 vehicles over the same period. However these forecast have not been realised. On Mottram Moor in 2015 according to NH's own counts (Case for the Scheme Figure 4.1) HGVs were 2,628 (9% of 29,200 AADT) or half what they were in 2007.

4) Item 3e-g) Autonomous vehicles - This is an area of relevance but high uncertainty in terms of impacts. Modelling on multi lane dual carriageways indicates increases in

efficiency, rising as the level of autonomy rises (for example that undertaken by Atkins using micro-simulation). The use of assisted driving is already happening on such roads, for example lane assist and speed limit warnings, the latter using the same information as satnavs.

5) These benefits are less clear on single carriageways or any road with a level of urban frontage.

6) The current scheme is very limited in length and has at grade junctions so is unlikely to benefit from any intermediate level of autonomy (i.e. other than full). Thus the A628 and A57 across the National Park would not benefit from the same lane efficiencies due to their being mostly single carriageway. However, they may benefit from improved speed limit enforcement through the increasing level of autonomy/driver assistance functionality in new cars and goods vehicles.

7) The use of the motorway and near motorway network for new infrastructure such as autonomy is under development and this includes freight with possible overhead power supply (NH has a pilot), and other means of improving safety through semi-autonomous features in new and future vehicles, both for goods and personal travel.

8) Overall, the conclusion is that motorways will benefit from partial autonomy and associated infrastructure while single carriageways will not.

Item 3 Traffic Effects Outside of the Order

9) A number of IPs, including CPRE, are extremely concerned at the impacts of the scheme on travel and traffic within Glossopdale (REP4-014, REP4-018, REP4-023, REP4-024, REP4-026, REP4-027, REP4-029, REP4-030). The scheme would lead to redistribution of traffic from the A57 onto residential roads with school access, parked cars, narrow pavements and people on foot and cycle going about their daily business.

10) It is unsatisfactory and unacceptable for NH to dismiss these impacts as insignificant. DCC acknowledge there has been a lack of attention to the local road network in Glossopdale (REP4-010, page 12). DCC also admitted that previous iterations of the scheme had shown the same impacts on Glossopdale (and the Snake Pass). We can confirm that this is correct, as the full Mottram-Hollingworth-Tintwistle bypass would have produced similar impacts. Why then did DCC not insist on more detailed examination of the impacts?

11) A rigorous examination of these impacts is now required. NPSNN (5.212) requires *'schemes should be developed and options considered in the light of relevant local policies and local plans,* ***taking into account local models where appropriate'*** (5.212; our emphasis). Whether or not DCC has a local model is immaterial – NH must show that the scheme has been developed and options considered in the light of local policies and plans. MTRU has shown (REP4-015) that NH has ignored both GMCA's Right Choice policy for 50% of trips to be made by active travel and public transport by 2040 and DfT's Decarbonisation Plan policy for 50% of trips to be made by active travel by 2030.

12) The IEMA standards were quoted to show mitigation is not required – only an increase in flows of 60% or more are considered significant. These are inappropriate standards for, and not compliant with, low-traffic neighbourhoods as sought by NPPF 2021 and the National Design Standard. NPPF 2021 para 92 seeks strong neighbourhoods that promote social interaction, are safe and accessible, and that enable and support healthy lifestyles. The National Design Guide also recognizes that public spaces, particularly streets, are important for all users who may wish to use them for activities such as socialising, informal doorstep play, resting and movement. They should encourage people to walk and cycle rather than to depend upon cars, particularly for short, local journeys. Increased traffic with rat running by drivers seeking quicker routes will increase the sense of road danger, disincentivise active travel, and increase car dependency, thereby leading to unhealthy lifestyles, less coherent communities and more road crashes.

13) DCC is now requesting changes to the junction between the A57 and Shaw Lane, because with the scheme it would be operating beyond capacity. We are not given any details but such changes would usually require a planning application which would then be widely advertised for public consultation. Any material changes, such as this proposal for the A57/Shaw Lane junction, agreed though the DCO process would not be subject to such consultation. It should not be part of the DCO and the impact on the junction should weigh against the scheme in the planning balance.

Item 3 Effects within the PDNP

14) NH continues to dismiss the effect of the Scheme on road safety on the A57 Snake Pass and on the A628T as insignificant. On both roads crashes increase over 60 years - 41 PIA on the A628 and 163 PIA on the Snake Pass are forecast. We are expected to take the results of the traffic modelling seriously when it comes to air quality or carbon emissions but to dismiss them when it comes to road crashes. Any increase in road crashes is contrary to the requirements of all of the following and unacceptable:
    - the NPSNN 2014;
    - the Strategic Framework for Road Safety 2011, paras 1.21 and 1.27;
    - the DfT's The Road Safety Statement 2019 A Lifetime of Road Safety;
    - National Park policy T1 and T2;
    - Transport for the North's Strategic Transport Plan 2019 pages 38 & 61;
    - the NH licence agreement
    - DCC LTP 3 2011-2026;
    - South Yorkshire Mayoral Combined Authority *'Safety for all road users must remain of paramount importance';*
    - South Yorkshire Local Transport Plan;
    - Sheffield City Council Transport Strategy (2018);
    - Kirklees MBC 2025 Transport Vision;
    - GMCA's 'a*mbition' …'To reduce deaths on our roads as close as possible to zero* (by 2040)*'*

15) In order to address the increased risk of crashes on the Snake Pass DCC is proposing average speed cameras. Both NH and DCC should be mindful of their section 62 duty under the Environment Act to have regard to National Park purposes. The impacts of such a safety scheme are not mitigatable and do not address the fundamental issue that traffic should not increase if the Park's statutory purposes are to be fulfilled. Such measures should only be applied in extreme circumstances, according to PDNPA policy.

Item 3 Impacts on public transport

16) The data we requested for public transport arrived at the end of the day on Friday 18th February and has not got the full matrix information. Analysis will take a little time, especially since there appear at first sight to be some sector to sector mode share numbers which need sense checking. There seems to be a very high level of variation.

17) Overall there are a small number of public transport trips, we understand this is at least due to the fact that only public transport trips by people who have a car available are in the model. This is important to clarify since the ISH discussed public transport and how far it was included in the model. It is clear that walking and cycling are not included. It is also clear that a significant amount of public transport use is not included and this needs to be the subject of discussion with NH to make sure this is correct and whether it is possible to estimate the level of missing trips and what their origins and destinations are.

Item 4 Landscape, visual and Green Belt

18) We support the PDNP in its request for views of the scheme from the B6105 north of the junction with Padfield Main Road.

19) We also support the PDNPA's response to ISH2 in REP4-012. By rejecting traffic restraint within the PDNP, NH is imposing adverse impacts on the PDNP. We consider the changes in traffic within the National Park would lead to significant adverse effects on landscape, visual amenity, tranquillity and dark skies, as we presented in our written representation REP2-069 and our response to ISH2 REP4-016.

Item 6 GHG

20) The ExA asked NH for an assessment of cumulative effects of GHG, the results of which we await before responding on GHG emissions. '*In addition Scheme specific data will be included in the response which will provide the change in GHG Emissions (With Scheme Scenario – Without Scheme Scenario) using updated Government Guidance since the publication of the Environmental Statement. These are:*

(i) Emission Factor Toolkit (version 11) (EFT v11), published by Defra in November 2021…

(ii) A sensitivity test of the Transport Decarbonisation Plan (TDP) upper and lower bounds'.

21) It appears from this response that new modelling runs are to be undertaken. These will include a faster rate of electrification (as we pointed out in previous submission) and some reflection of the DfT Decarbonisation Strategy, which we also support. However, the assumptions on which these runs are based will, essentially, determine the results. We would call for a fully modelled Decarbonisation Strategy option with the schemes which will achieve it for walking, cycling and public transport included but not the A57 scheme. The impact of the scheme could then be tested.

22) Simply using a traffic reduction figure for the Decarbonisation Strategy (itself derived from the CCC work we have set out in a previous submission) and assuming it will come about by a general application of policy is very much second best. It also ignores the conflict with policy to which we have given economic values in our D4 submission.

23) Whatever is done it must allow for:
- identification of the revised electrification pathway and assumptions used for a run separately from other Decarbonisation Strategy factors
- a run which is a plausible Do Minimum: i.e. contains a package of encouragement for sustainable travel and discouragement for traffic in all the relevant areas (towns and cities)
- a run which is a plausible Do Something: i.e. the current scheme as previously modelled but with the electrification pathway changed.

24) There is also an issue here of public confidence. The figures produced are likely to change significantly. The outputs from the modelling will depend on the assumptions used and the approach, for example how the change in trips from the Decarbonisation Strategy are applied to the model. There are ways in which the approach taken will determine the outcome and to an extent this is predictable.

25) In addition, it seems likely that the results from this new modelling will be very different from that presented to the Examination so far. In these circumstances the equivalent data would be requested from NH for the new runs and CPRE would wish to have a reasonable time to consider them properly. We doubt this can be achieved within the current timescale, even if NH were more prompt than they have been so far. For this reason we think that the process may have to be started again but hopefully with more openness to technical discussion and dialogue.

Item 6 GHG mitigation measures

26) Active travel measures are proposed as part of the mitigation of GHG emissions. According to DfT's Decarbonisation Plan active travel measures would have minimal impact on reducing carbon emissions. They could contribute a small saving of between 1-6MtCO2, but with increased uptake of ULEVs and ZEVs this would reduce

to 1-2MtCO2. This is out of total savings from other modes of 1,307-1,797MtCO2. As DfT's Decarbonisation Plan recognises, active travel is important for other reasons e.g. health and community vibrancy, but measures to encourage it should not be used in the planning balance to mitigate carbon emissions.

Item 7 Air Quality

27) AQMAs – we continue to maintain that both Tintwistle and Dinting Vale AQMAs should be subject to a full assessment. HPBC will be making further comments after which we will respond as appropriate.

Item 8 Other specific Issues

The water environment, drainage, flood risk assessment, Water Frameworks Directive

28) Item 8c) We note the Environment Agency's concerns about the flood risk assessment undertaken by NH. Over the weekend of 19/20 February 2022 the A57 between Woolley Bridge and Melandra road, where the Link Roads would join the existing road network, was subject to flooding (see photo below) and residents were evacuated from the area. The A57 is regularly subject to flooding in this area, and lies in flood risk zone 3a (Manchester SFRA Detailed Tameside Map 21). This location is inappropriate for new road infrastructure, as reinforced by recent events.

29) The photo below is looking east along the A57, The pedestrian crossing lights for the Pennine Bridleway can be seen at the extreme left of the picture.

Land use, social and economic and health

30) Item 8 g) Concerns have been raised regarding the effect of increased traffic volumes on the Snake Pass affecting land stability on the route, and the disruption this may cause. Over the weekend of 19/20 February 2022 there was a substantial landslip on the Snake Pass just east of Alport Bridge (see photo below looking west along the A57 below Gillott Hey as it dips towards Alport Bridge). This caused the land adjacent to the road to drop more than four feet, as demonstrated by the fallen fence, which exposed the unstable shale foundations to the road. The road was undermined and the westbound carriageway is cracking along its length in response to this. It is now closed to through traffic for an undetermined period.

31) The A57 Snake Pass crosses several areas of unstable land and regularly slips, causing disruption to traffic using the road. On this occasion heavy rainfall from Storm Franklin was responsible for the acute event. However, the landslips continue to develop and occur without the stimulus of storms. Increasing traffic would increase the frequency of vibration of the ground which will lead to an increased likelihood of landslips. There is much evidence from around the world that vibration induced by traffic contributes to land instability. This is a strong argument weighing negatively in the planning balance.