

**A57 Link Roads**

**TR010034**

**9.53 Applicants' comments on Deadline 3  
submissions**

Rule 8(1)(k)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

February 2022

# Infrastructure Planning

## Planning Act 2008

### The Infrastructure Planning (Examination Procedure) Rules 2010

### A57 Link Roads Development Consent Order 202[x ]

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#### 9.53 Applicants' comments on Deadline 3 submissions

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<b>Rule Number:</b>	Rule 8(1)(k)
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# 1. Introduction

1.1.1. This document provides the comments of the applicant, National Highways, in response to the Submissions made at Deadline 3 as requested by the Examining Authority at Deadline 5 in its Rule 8 letter dated 19 November 2021. Comments have been provided on the following documents:

- CPRE – Peak District and South Yorkshire Branch Deadline 3 submission (REP3-031)
- Daniel Wimberley’s Deadline 3 submission (REP3-032)

1.1.2. National Highways has sought to provide comments where it is helpful to the Examination to do so. National Highways has not responded to every submission for instance, because the submission was very short, or because it contained expressions of opinion without supporting evidence. where National Highways has chosen not to comment this is not an indication National Highways agrees with the point or comment raised or opinion expressed

## 2. CPRE – Peak District and South Yorkshire Branch Deadline 3 submission (REP3-031)

2.1.1. National Highways has reviewed the traffic section of this response. Please refer to

Response reference:	Representation Issue	National Highways Response
9.53.1	<p><b>Question 8.1b) Any other relevant policy or legislation to consider?</b></p> <p>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 Strategy<sup>26</sup> 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.</p>	<p>Please refer to section 3.9 of National Highways' response to CPRE's written representation submitted at Deadline 4 (REP4-005).</p> <p>The plans from TfN and Greater Manchester were not considered. However, although some local authorities such as GMCA have set ambitious local targets, emissions are considered in the context of national carbon budgets.</p> <p>It should be noted that the TDP also states on page 5 '<i>Our ambitious roads programme reflects – and will continue to reflect – that in any imaginable circumstances the clear majority of longer journeys, passenger, and freight, will be made by road; and that rural, remote areas will always depend more heavily on roads</i>'.</p>
9.53.2	<p>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 '<i>No specific assessment of the effect of the Proposed Scheme on public transport journey times across, and within, the study area has been undertaken.</i>' With respect to physical activity there is a neutral impact. NH state that '<i>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</i><sup>27</sup>. 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.</p>	<p>The Scheme incorporates a comprehensive range of improvements for non-motorised users that will encourage local trips to be made by active modes of transport rather than by car. See National Highways' response 19.6 to Derbyshire County Councils Local Impact Report (REP3-018).</p> <p>The traffic modelling enables National Highways to predict that the journey times and service reliability for some bus services will improve with the Scheme because of the reduction in traffic congestion and delay on A57 through Mottram in Longdendale, whilst for other bus services there may be a deterioration in journey times and service reliability due to increased traffic flows on some roads due to the Scheme, e.g. in Glossop.</p> <p>Bus services have not been modelled separately because bus services in the area are relatively infrequent and changes to bus journey times are capable of being estimated from the traffic modelling. As bus services are relatively infrequent, bus passenger numbers are very small in comparison to the overall number of vehicles using the affected road network. Consequently, the effects of changes in bus journey times do not materially alter the assessment of the benefits of the Scheme.</p>
9.53.3	<p>23. [...]</p> <ul style="list-style-type: none"> <li>Linear plantings that in DCC's words<sup>15</sup> '<i>map the route of the road rather than responding to the particular landscape it passes through</i>'; in an open agricultural landscape the plantings would reduce openness.</li> </ul>	<p>Refer to National Highways' response to the Local Impact Report for Derbyshire County Council and High Peak Borough Council (REP3-018) (pages 30 and 31).</p>
9.53.4	<p>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</p>	<p>We do not consider there to be an inconsistency. The full quote, taken from National Highway's response to Examining Authority's First Written Questions (REP2-021) is as follows:</p>

Response reference:	Representation Issue	National Highways Response
	<p>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.</p>	<p><i>It is recognised that during the operational phase, and following mitigation, 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.</i></p> <p><i>However, as set out in Table 7.21 in Chapter 7 of the ES (TR010034/APP/6.3(2)), considering the wider context 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.</i></p> <p>The first paragraph in the above quote refers solely to the corridor of land that will be occupied by the permanent features of the Scheme. It is a simple recognition of the obvious that a corridor of land which is currently grass will become road and associated infrastructure.</p> <p>The second paragraph of the quote relates to the wider context within which the Scheme will and so reflects a much wider view of the area.</p>
9.53.5	<p>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.</p>	<p>National Highways has responded to the matter of Green Belt (including the cutting in two). Please refer to National Highways comments on CPRE's response to written question 4.1, pg.26 in Examination document reference REP3-021 - <i>As the NPS NN is the primary decision-making framework for the Application , section 7.5 of REP2-016 primarily refers to the section of the NN NPS relating to the Green Belt, along with the NPPF. Policy EQ4 reflects the NPPF and states that "Within the Green Belt, planning permission will not be granted for development unless it is in accordance with national planning policy". The Scheme is considered to be in accordance with National Policy as regards to development within the Green Belt.</i></p> <p>Refer also to National Highways' comments on CPRE's Written Representation, Section 4, (REP4-009).</p>
9.53.6	<p>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</p>	<p>Refer also to National Highways' comments on CPRE's written Representation, Section 4, (REP4-009).</p>
9.53.7	<p>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 bridge<sup>19</sup>. 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'.</p>	<p>National Highways maintains its position that the scheme is accordance with NPPF policy on green belt and therefore it does not conflict with policy EQ4</p>

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9.53.8	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.	National Highways maintains its position that the scheme is appropriate development in the Green Belt and so no planning balancing exercise is required. However in line with NPPF paragraph 148 National Highways believe that if the development is not considered appropriate then 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, as set out in the Case For The Scheme (REP2-016).
9.53.9	<p>Question 4.2</p> <p>34. We do not agree with NH's reasoning about 'any other harm'. We used the Court of Appeal judgement in SSCLG &amp; 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).</p> <p>36. 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 <i>appropriately assessed, the benefits of the Scheme outweigh any adverse effects</i>'.</p>	Refer to National Highways' response to Written Question 4.2 in its response to the Examining Authority's First Written Questions (REP2-021)(pages 59 and 60) which explains that the case confirmed that when considering inappropriate development in the Green Belt, the term "any other harm" permits a decision maker to include non-Green Belt factors in a weighing exercise against the "very special circumstances" and "other considerations" in favour of granting permission. However we consider that to the extent it may be necessary, an assessment of "other harm" is already included in the Case for the Scheme (see sub-sections 7.6 to 7.20 of the Case for the Scheme) and when appropriately assessed, the benefits of the Scheme outweigh any adverse effects.
9.53.10	38. We do not agree that the scheme is appropriate development, as the dual carriageway is part of the SRN. NPSNN states that ' <i>when located in the Green Belt national networks infrastructure projects may comprise inappropriate development</i> '. Therefore the requirements of para 148 apply and very special circumstances must be found for it to proceed.	NN NPS paragraph 5.178 states that " <i>when located in the Green Belt national networks infrastructure projects may comprise inappropriate development</i> ", not that it definitely does in all circumstances. The NN NPS covers a range of infrastructure projects including large rail freight interchanges which may indeed be inappropriate in the green belt as compared to a road like the Scheme, which is of a type (local road infrastructure) that is specifically mentioned in the NPPF as being appropriate (provided it preserves openness which in our view it does).
9.53.11	<p><b>Landscape – Response to Local Impact Reports and responses to ExA's First Written Questions</b></p> <p>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, '<i>such as the attenuation pond and flood compensation close to the River Etherow which may be particularly prominent from the Melandra Roman Fort</i>'.</p>	National Highways acknowledges that the challenge is to integrate the route into the small-scale field pattern and woodland/hedgerow pattern, balanced against the needs to achieve functional screening. Reference should also be made to the response in (REP4–008) Item 4 k)

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9.53.12	<p>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.</p>	<p>National Highways maintains its position that the scale of the published LCAs is considered suitable for the purpose of the indirect effect assessment undertaken and breakdown would not change the findings.</p>
9.53.13	<p>Responses to the ExA's first written questions by NH, local authorities and the PDNPA</p> <p><b>Question 5.1</b></p> <p>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.</p> <p><i>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 <b>development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.</b> (our emphasis)</i></p>	<p>NPPF Paragraph 176 refers to developments that are within a National Park and the setting of a National Park. It has been previously noted by the Applicant in Comments on Local Impact Report submitted by Peak District National Park Authority (REP3-028) that the Scheme does not lie within the National Park, but consideration has been given to the Scheme with regards to the design location to avoid or minimise effects on both designated and undesignated areas, as demonstrated in Figure 2.4: Environmental Masterplan (APP-074) The Scheme is primarily assessed against the National Networks NPS rather than NPPF.</p>
9.53.14	<p>Air Quality – HPBC Answers to ExA's First Written Questions</p> <p><b>Question 7.6</b></p> <p>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 8.46<sup>44</sup>. Results for both AQMAs should be presented.</p>	<p>National Highways has previously responded to this issue in its response to Derbyshire County Council and High Peak Borough Council's Local Impact Reports paragraphs 8.41 and 8.42 (REP3-018) (pg. 22) and National Highways' response to High Peak Borough Council's comments on the Examining Authority first Written Question 7.15 and 7.16 (REP2-021) (page 89 and 90).</p>



### 3. Daniel Wimberley Deadline 3 submission (REP3-032)

Response reference:	Representation Issue	National Highways Response
	<p>The overall accuracy of the picture we are being presented with is questionable. Some things we are being told are hard to believe, there are major discrepancies, etc. Some form of independent peer review will be needed to address this matter.</p>	<p>The traffic modelling used for the assessment of the Scheme has been developed, calibrated and validated in full accordance with Department for Transport's (DfT) Transport Analysis Guidance (TAG). Forecast traffic growth is based on factors derived from the DfT's National Trip End model in combination with forecast changes in traffic volumes due to committed developments and schemes. The traffic modelling has been subject to compliance with validation metrics, internal quality control by the consultants undertaking the modelling (Atkins) and independently reviewed by a separate team within National Highways. National Highways is therefore confident that the traffic modelling used to assess the Scheme is both fit for purpose and robust.</p>
	<p>Some data appears to be "data non grata" – data which is being kept, if not totally under wraps, at least, decently out of normal sight. <b>This data should be made fully visible in the name of transparency and good ordering of the EiP.</b></p>	<p>The Transport Assessment Report has been prepared in accordance with best practice guidance and presents all the key changes in traffic flows due to the Scheme across the affected road network in sufficient detail to enable a full understanding of its likely impacts.</p>
	<p>At many junctures we are told that x, y, or z cannot be examined in detail. X, y or z has been "screened out" or "scoped out" because it did not meet some relevant criterion and this always comes back to statements by HE to the effect that: – 'the difference between Do- Something and Do-Minimum is not great enough to trigger investigation.' I believe that underpinning this mass non-investigation of matters, all of concern and some of them of extreme concern, lies a systematic methodological flaw which can and should be remedied.</p>	<p>Screening out small changes in traffic flows from an impact assessment is industry standard best practice.</p>
	<p><b>The Mottram Market Street anomaly</b>  <b>i) HE replies Q.3.11</b>          HE's explanation of the forecast increase in traffic DS-DM on Market Street in Mottram, appears to be plausible. However my concern with the forecasts at Market Street (site number 6 on the maps on pages 52 and 53 in CftS,) is that the 2 streets south of Market Street (sites 4 and 5) which feed traffic into, and take traffic from it, each has a far larger flow than Market Street itself. How can this be?  <b>'traffic will not increase overall'</b></p>	<p>Traffic flows across the whole road network are forecast to increase with or without the Scheme. The Scheme changes the distribution of forecast traffic flows across the road network, with resulting increases in traffic on some roads and decreased traffic flows on other roads compared to without the Scheme. The Scheme does not result in an overall increase in traffic across the whole modelled road network compared to without it.</p>
	<p><b>ii) HE replies Q.4.1</b>          First this is irrelevant to the question asked. No one is talking about whether there is more traffic in total in this area with or without construction. The question is: is the new to-be- constructed-perhaps road "inappropriate development"? If it does, then the question of justifying this intrusion has to be faced and at that point, issues such as the overall value of the road do arise. And, yes, the road clearly destroys the open and "natural" character of this land – it is strange for anyone to pretend otherwise. So – there has to be a</p>	<p>Traffic flows across the road network are forecast to increase both with and without the Scheme compared to the current baseline situation. The Scheme results in a redistribution of traffic on the affected road network compared to the do-minimum, with some roads forecast to see increases, but these increases are balanced out by reductions on other roads. The redistribution of traffic does not, however, result in any significant overall change in total vehicle kilometres. There is a roughly equal increase in overall vehicle kilometres in both the Do-something and Do-minimum scenarios compared to the current baseline situation due to forecast traffic growth.</p>

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	<p>good reason for doing this “inappropriate development” so . . .</p> <p>Second, and more near to my concerns in this theme, is whether this statement can be true. It is a very puzzling claim. Some points:</p> <ul style="list-style-type: none"> <li>• In their answer to question 3.6 HE say that additional traffic is forecast to be attracted to the new link road from alternative routes.</li> <li>• In RR-0677-1 HE a) already admitted the re-routing (attraction) effect, b) stated that by 2040 the DS flows will be 10% more on the A628 and 38% more on Snake than the DM flows. And then claimed that <b>the total traffic kilometres over the appraised network will be the same with the scheme as without it.</b> This claim, together with the admissions re the increases, is made repeatedly in REP1-042</li> </ul> <p>And yet I remember clearly that the overall picture which HE paints in CftS and TAR, and in CB also, is of a steady increase in traffic generally, and by extension in this area. Is this the case, or not?</p>	
	<ul style="list-style-type: none"> <li>• For example, when writing about “The requirement for the Scheme” in CftS (APP- 182) HE say (Para. 3.1.2): “There are many factors that presently reduce journey time reliability these include severe weather; <b>long term traffic growth which will bring some urban sections to their capacity</b>; maintenance on single carriageway sections; accidents; asset condition, including the standard, age and damage to infrastructure; and a lack of technology to assist in the operation of the routes and provide information to travellers” (my emphasis)</li> <li>• Or for example, in Chapter 5, the economic case of CftS we read at Para. 5.1.6): “The economic assessment is based on the assignment of a forecast Core Growth Scenario, with alternative sensitivity tests using Low Growth and Optimistic Growth assumptions for the volume of traffic using the Scheme (as aligned with TAG Unit M4 (Forecasting and Uncertainty). The <b>Core Growth Scenario traffic forecast</b> (DW Note: which is the one used by HE, as I understand it, as their main forecast) <b>is based upon what is deemed the most likely</b> land use and <b>traffic growth assumptions</b> for the route” (my emphasis)</li> <li>• Or for example, in the TAR, (APP-185) we read, as part of the section on the “Future Baseline” at Para. 4.1.1: “The Do-Minimum modelling undertaken predicts that vehicle flows on the highway links within the study area will continue to increase in a Do-Minimum scenario. Between <b>2025 and 2040, vehicle flows on all links except for the B6174 are forecast to increase.</b>” (my emphasis) After which TAR gives some examples.</li> </ul> <p>Specifically there are plenty of roads with increased traffic. RR-0571 states: “Projections for the proposal indicate substantial increases in traffic and related emissions on the A57 Brookfield (31%), A57 Snake Pass (38%), on minor roads - New Road Tintwistle (50%), Norfolk Rd (21%) and Dinting Rd (45%), and small but significant increases on the A6016 Primrose Lane, A57 High St East, Shaw Lane and Cemetery Rd. All these roads have households living adjacent to them and Dinting Road has a school” This is very hard to reconcile with HE’s claim.</p>	<p>The impacts of the potential increases in traffic on these roads due to the Scheme have been assessed by National Highways and deemed not to give rise to any adverse effects on road safety or severance sufficient to trigger a requirement for any mitigation. This is on the basis that where there are notable proportional increases in traffic flows, the absolute increases in the number of additional vehicles is relatively low.</p>

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	<p>Be that as it may, there is something not quite right here. There are 2 versions of what is going to happen, and they both cannot be right. I am tempted to do some wondering about why this should be so. But it is enough to say to you that this inconsistency should not be allowed to stand and needs to be cleared up.</p>	<p>It is acknowledged there is a difference in the Department for Transport (DfT) daily count data and the base year modelled flow. The DfT counts themselves are not used as part of the traffic model build in part because the "observed" traffic flows as stated by DfT are often extrapolated estimates from previous counts where they were not counted in that specific year. Separately commissioned traffic counts were used to develop the traffic model as part of the model calibration process. These are considered more representative than the DfT counts. It should be noted that modelled traffic flows are based on average hourly flows by time period (AM, PM and interpeak) rather than the daily flow, hence there is scope for greater differences to develop between modelled flows and the DfT count data when factored to a full day.</p>
	<p><b>Bamford Village anomaly</b></p> <p><i>Charlotte Farrell says (Para. 6):</i></p> <p>“National Highways has not provided any logical explanation or indeed any explanation for this assertion and in fact it contradicts its own evidence on road safety in the Transport Assessment. Figure 7.2.10 of the Transport Assessment summarises the impact of the scheme in terms of personal injury accidents. It shows that it expects there to be a negative effect on the A6013; and even on the A6187; which, based on their earlier statements in that chapter indicate that they expect there to be increased number of vehicles using the road.”</p>	<p>The village of Bamford is on the A6013 which connects the A57 Snake Road to the A6187 that runs parallel to the A57 to the south. Consequently, any changes in traffic flows on the A57 or A6013 would not necessarily result in a change in flow on the A6013 through Bamford. The traffic modelling used to assess the Scheme indicates that the traffic flows on the A6013 through Bamford are forecast to marginally reduce in 2025 (by -1%), but marginally increase in 2040 (by 1.6%) compared to without the Scheme. These forecast changes in flow are not considered to be significant. The evaluation of changes in the forecast number of accidents on the affected road network due to the Scheme covers 60 years. Consequently, the small forecast increase in traffic flows on the A6013 through Bamford from 2040 results in a correspondingly marginal increase in the forecast number of accidents on the A6013.</p>
	<p>How can we explain this? Well, PDNPA have also noticed this. At <b>Para. 8.4.6 of their LIR</b>, we read:</p> <p>“8.4.6 The percentage increase in flow on the A57 Snake Pass in 2025 with the scheme seems to be very large (37.7%) but the Environmental Statement (Table 7.32) only notes a ‘slight increase’ of traffic on the A57 (e.g. in relation to VP23) with no change to the Special Qualities of the National Park. We are concerned that the assessment of impact of increased traffic on the A57 is underestimated.”</p> <p>So here we see repeated, by the PDNPA, this same concern – namely that the increase (meaning DS-DM) is 38% and yet the ES calls this a “slight increase” This makes me wonder if there are not 2 different figures in play here, that underlying this discrepancy lies an error of some kind. The alternative is that the ES is being disingenuous. In this case I prefer the former explanation (in the technical sense of – “I think it is more likely” – <b>but please can the ExA find out what is going on here?</b></p>	<p>Although the increase in traffic due to the Scheme on the A57 Snake Road/Pass is forecast to represent up to a 38% increase, the absolute increase in the number of additional vehicles is relatively small at approximately up to 1,450 vehicles per day, which is equivalent to approximately an average of 2 to 3 vehicles per minute in each direction. It is on this basis that the forecast increase in traffic on the A57 is not deemed to be significant in terms of perception because of the already high number of vehicles using the route.</p>
	<p><b>Impact of this issue on bus services</b></p> <p>Considering the impact of the scheme on local bus services brings home how important this issue of the generalised traffic burden on the area as a whole is (not to mention the whole issue of traffic nuisances).</p> <p>HE writes this in reply to question 3.14 about the impact of the scheme on bus journey times: (another screenshot, copying not possible)</p>	<p>The traffic modelling enables National Highways to predict that the journey times and service reliability for some bus services will improve with the Scheme because of the reduction in traffic congestion and delay on A57 through Mottram in Longdendale, whilst for other bus services there may be a deterioration in journey times and service reliability due to increased traffic flows on some roads due to the Scheme, e.g. in Glossop.</p> <p>Bus services have not been modelled separately because bus services in the area are relatively infrequent and changes to bus journey times are capable of being estimated from the traffic modelling. As bus services</p>

Response reference:	Representation Issue	National Highways Response
	<p>Firstly, Figure 3.5 on page 28 of the TAR shows bus routes in the area – the associated text gives more details.</p> <p>Secondly, HE says in this reply that no study has been undertaken and yet the TAR says at Para. 3.4.11 also on page 28: “It is expected that bus services running through the study area will benefit from improved journey times and reduced congestion”</p> <p>Thirdly, putting the above two statements together reveal that there is no basis for HE’s claim beyond them asserting it to be so. And yet the means exist for all participants in this EiP including, indirectly the public in its widest sense to get a clear picture of these issues (subject to any questioning of the correctness of the predictions, (see zzz for more on that question)</p> <p><b>This is so important. Please can you, the ExA ask HE to publish a series of clear maps showing the traffic flows which they are predicting with and without the scheme, throughout the area, in the opening and design years, and also with the “current” flows, so that we all know what assertions about pollution, severance, and bus services sticking to time, are reasonable and which are not???</b></p>	<p>are relatively infrequent, bus passenger numbers are very small in comparison to the overall number of vehicles using the affected road network. Consequently, the effects of changes in bus journey times do not materially alter the assessment of the benefits of the Scheme.</p>
	<p><b>TRAFFIC DATA - DATA NON GRATA – THE GLOSSOP QUESTION – (see screenshot on page 12 of original submission)</b></p> <p>HPBC and DCC both put in a holding objection because of inadequate information, which did not allow them to understand the scheme and its impacts.</p> <p>Accident levels seem to show that taken as a whole the network has more traffic, as this extract from the BBA documents shows, page 50, Para. 5.4.3</p> <p>“5.4.3 A more detailed analysis of impacts across the network shows that the A57 Snake Pass, which is known to have a high accident rate, is forecast to experience an increase of more than 160 accidents. This alone exceeds the total impact across the rest of the network combined. <b>Small increases in accidents are also expected through Glossop and along the A628. The scheme does not make any of these roads intrinsically less safe but increases traffic flow, leading to a higher potential for accidents to occur.</b> Flow is reduced elsewhere on the network, such as along the M62, but motorways are safer than other road types and so the net impact of the combined rerouting is negative.” (my emphasis).</p> <p>My comment: if the “total vehicle kilometres” was genuinely the same with and without the scheme, then according to the technical people the accident level would also remain the same.</p>	<p>The accident risk varies by type of road, so if the distribution of traffic changes across a road network it does not mean that the overall accident risk remains the same even if the total vehicle kilometres remain unchanged. This is because the proportion of traffic using different types of roads with either higher or lower accident risk levels may change. The forecast increase in accidents due to the Scheme over 60 years represents only a 0.3% increase overall across the affected road network compared to the Do-minimum scenario, which is considered marginal. To some degree this reflects the fact that the Scheme is not forecast to result in an overall increase in total vehicle kilometres.</p>
	<p><b>TRAFFIC DATA - SCOPING OUT DUE TO TRAFFIC “INCREASE NOT BEING GREAT ENOUGH</b></p>	<p>Screening out small changes in traffic flows from an impact assessment is industry standard best practice. The purpose of the assessment is to establish the impacts and consequential effects of the Scheme and isolate these from the impacts due to forecast traffic growth that would happen without the Scheme in any</p>

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	<p>I put it to you, the ExA, that this is simply not satisfactory. I think I know what the answer of HE would be if you were to ask them the question, namely whether my suggestion would not give a more accurate picture, to the public – meaning everyone – and would not better guide the decision as to whether an assessment is necessary for x, y, or z. I think they would say that they are following their guidelines, in this case, I believe that is in the DMRB (but I may have gathered that wrongly, and maybe it is enshrined in more than one guidance document). To which I would reply that in that case there is a problem with the guidance, and I can only plead with you, the ExA to deal with that fact appropriately. To sum up, the guidance is designed in such a way that the public is badly informed, and even one could argue, misled and that is unsatisfactory, and non-compliant with principles of good governance, such as Nolan.</p> <p><b>Please will you ask the question above, or preferable by far, simply instruct HE to place before this examination the requisite comparisons, in chart, and in map form.</b></p>	<p>event. This is achieved by comparing the Do-something with the Do-minimum scenario. The purpose of the assessment isn't to assess the impacts and consequential effects due to forecast traffic growth that is forecast to happen with or without the Scheme, i.e. comparing either the Do-something or Do-minimum scenarios with the baseline.</p>
	<p><b>THEME 2 –THE DOCUMENTS OF BBA RELEASED BY CPRE TO THE EXAMINATION</b></p> <p>My observations on this bundle of documents will be under the following headings:</p> <ol style="list-style-type: none"> <li>1) A single track methodology</li> <li>2) The uncertainties list</li> <li>3) Climate change</li> <li>4) The policy environment</li> <li>5) BCR's</li> <li>6) Switch of consultants</li> </ol> <p><b>A few preliminary remarks</b></p> <p>Firstly, a word of gratitude is due to CPRE for submitting these documents to the examination.</p> <p>And secondly, I do think that a word of reproach and puzzlement should go to Highways England for not submitting this documentation for scrutiny at this examination or as soon as it was prepared.</p> <p>I note from the document themselves that the economic appraisal package is dated 26//07/2021 and two of the other documents are dated 12 / 11 / 2021 and that one document is undated. I must say that I have to assume that the vast majority of this work was done well before November.</p>	<p>It is not normally appropriate to release partial information into the public domain in advance of the full package of information being submitted with the Development Consent Order application. This is because partial information would potentially be misleading or misunderstood in the absence of all the supporting information for the Scheme that enables full comprehension of all aspects of the Scheme assessment in combination.</p>
	<p><b>The uncertainties list</b></p>	<p>The assessment of the Scheme takes full account of the policy environment and its effect on climate change. The former is presented in the Case for the Scheme (REP2-016) and the latter is covered in the</p>

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	<p>This is given at paragraph zzz. I am sorry the deadline looms and I cannot give the exact reference. The list includes the price of fuel, and I believe the likelihood of local developments happening. But amazingly the list does not include climate change or or the policy environment and the effects of that environment unlikely future traffic flows.</p> <p>I do not think that this can be put down to a simple oversight. If you are I were writing down a list for such a document, a list of example uncertainties, you would put in the ones most likely to elicit a positive nod of response from the reader. The fact that climate change and the Policy Environment do not figure in the list reviews a serious gap in the mindset involved.</p>	<p>Environmental Statement (REP1-019). Some effects of the Scheme can be monetised and feed into the cost benefit analysis on which the Benefit to Cost Ratio (BCR) is based. However, it is not possible to monetise other effects of the Scheme, e.g. some environmental effects. Nonetheless, both the monetised and non-monetised are fully evaluated in the overall assessment of the Scheme.</p>

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