

A57 Link Roads Scheme DCO Application

**Representation and response on behalf
of the Peak District National Park
Authority to the Examining Authority's
questions and requests for information
which formed part of the agenda for
Issue Specific Hearing 3, or arose from
discussions at the Hearing and
requested for Deadline 9**

**Produced by the Peak District National Park
Authority (April 2022)**

Submitted 27th April 2022

Application by Highways England for an Order Granting Development Consent for A57 Link Roads

The Examining Authority's questions and requests for information which formed part of the agenda for Issue Specific Hearing 3 or which arose from discussions at Issue Specific Hearing 3 – Issued on 28th March 2022;

Requested for Deadline 9 – Wednesday 27th April 2022

Response on behalf of the Peak District National Park Authority.

Item 3	PEAK DISTRICT NATIONAL PARK	
	Indirect effects	
	Peak District National Park Authority	<p>The Applicant [REP6-017] summarised the hourly increases in traffic on the A57 and A628 through Peak District National Park. Increases are up to 132 (52.6%) on the A57 and up to 107 (9.9%) on the A628. The Applicant's position is the changes in traffic would not result in any significant changes in noise or air quality along these routes. It considers that increases in traffic flow are not anticipated to result in any corresponding growth in the demand for car parking within the Peak District National Park. The Applicant considers that the additional headlights from increased traffic flow would not be readily perceptible in relation to the magnitude of change.</p> <p>i) Please could the Applicant quantify the increase in noise levels arising from the quantified increases in traffic? Please could that quantification then be used to update the assessment of indirect effects in terms of the perception of changes in noise, landscape and visual impact, tranquillity</p> <p><i>“it would be helpful to have the consideration of the implications of that increase for the National Park in terms of significant effects, but potentially more widely than that, in terms of professional purposes and all the tranquillity issues. In that respect, it would also be helpful to get further having now seen the quantification of that in terms of 1.8 decibels, it would be helpful to have a further response from the Peak District National Park Authority.”</i> [Question from the Examining Authority to the Peak District National Park Authority, as recorded in the transcript for Issue Specific Hearing 3, Session 4, Time ref: 51:13]</p> <p>As with landscape receptors, the level of significance of change is dependent on the sensitivity of the receptor, when assessing the impact of traffic noise on tranquillity. The Merriam Webster definition of tranquillity is: -</p> <p><i>“the quality or state of being tranquil”</i> – with the example quoted being <i>“the tranquility of the quiet countryside”</i>¹.</p>

The Applicant presents a table of changes in Representation 9.75 Applicant's written Summary of Issue Specific Hearing 3 (9.75.42) that provides predicted changes in noise levels as a result of the scheme. Whilst we have no reason to doubt the predicted changes in noise levels, we would argue that perceptions of change are more variable than described, depending on the location and activity being undertaken. If your expectation is for a quiet experience, any increase in man-made noise is at best a distraction and at worst aurally intrusive, with negative effects on enjoyment of that tranquillity.

The scheme is predicted to significantly increase traffic flows on the A628 and A57 Snake Pass, both of which pass through arguably the most tranquil and unspoilt parts of the National Park. In the case of the A57 Snake Pass, the increase is more than 1,000 vehicles AADT (+38%). Whilst acknowledging that current flows on the A57 Snake Pass are relatively low, this makes the perception of change more significant. We would also wish to stress that the anticipated effect on tranquillity is as a result of increased traffic flow, it is not solely related to changes in decibels.

We believe that in addition to traffic noise, other factors add to this disturbance of tranquillity and quiet enjoyment. These include; visual disturbance (traffic movement and light glinting off of windscreens or bodywork); exhaust fumes, road dust (often hanging in the air after the passage of vehicles), spray etc. All of these factors affect perceptions of tranquillity and the quiet enjoyment of the National Park. As previously stated topography plays a role in how these factors are experienced. At Snake summit, views are expansive, both from the A57 and from the surrounding countryside and the Pennine Way. To the east of Snake summit, noise from traffic reverberates from the valley walls and as such is projected towards footpaths on the valley sides.

In the case of the A628, traffic noise is already a fairly constant factor along the corridor, and can be heard from both the Longdendale Trail (west of Woodhead Station) and the Trans Pennine Trail (east of Woodhead Station); as well as from footpaths accessing the moors north and south of the road. Whilst the predicted increases in noise are relatively low, they nonetheless worsen the existing situation. Even small increments of noise within sensitive environments are still harmful to tranquillity and the experience of quiet enjoyment of the National Park.

Chapter 7 of the Environmental Statement, paragraph 11.3.39 sets out the criteria for assessment of the measurement of noise in relation to the scheme; stating: -

“The noise modelling software predicted the road traffic noise levels at sensitive receptors by implementing the calculation procedure detailed in the CRTN, which involves calculating the Basic Noise Level at 10 m from the kerb using the traffic parameters described above and predicting noise level at receptors by taking into account topography, ground absorption, reflections and screening from intervening structures.”

It is worth noting that there are a number of locations along the A57 Snake Pass where walkers are obliged to walk alongside the road (at less than 10 m from the carriageway) for some distance in order to connect walking routes. Not only will the increase in traffic affect the quiet enjoyment of their experience, it is also likely to affect their safety. This is also the case for off-road cyclists connecting routes and for road cyclists using the Snake Pass. The recent

		<p>popularity of the route with cyclists whilst the road was closed demonstrates the latent demand for its use by cyclists.</p> <p>It is our belief that the Environmental Statement accompanying the scheme application does not adequately assess the impact of the scheme on the tranquillity and quiet enjoyment of the National Park. We also believe that the neither WebTAG or the DMRB fully reflects the sensitivity of National Parks or their special qualities. This makes it difficult for those special qualities such as tranquillity to be fully assessed.</p>
Item 7	OTHER ENVIRONMENTAL MATTERS	
	Green Belt	
	Peak District National Park Authority	<p>The ExA is considering whether the Proposed Development preserves openness and whether it should be considered as inappropriate development in the Green Belt.</p> <p>aa) In case the ExA does conclude that it would be inappropriate development, please would the Applicant set out its case for the very special circumstances that would be needed for the Proposed Development to proceed? Please could that be provided for Deadline 8 (Wednesday 13 April 2022)?</p> <p>bb) Please could the local authorities and Peak District National Park Authority provide comments on the Applicant's case by Deadline 9 (Wednesday 27 April 2022)?</p> <p>The Green Belt in question is located outside of the National Park, so Tameside Metropolitan Borough Council and High Peak Borough Council would have the primary 'role' in considering likely effects of the development on the openness of the Green Belt and views thereof.</p> <p>It is likely that the scheme will have an adverse effect on the openness of the Green Belt, particularly as it incorporates structure such as noise barriers, that by their nature will raise the vertical profile of the scheme in places. Similarly, where the scheme is carried on embankment or bridges, these structures will affect the openness of the Green Belt.</p> <p>The National Park Authority would be particularly concerned if the scheme included proposals to change the Green Belt boundary. Such a proposal could lead to additional development within the buffer of the National Park with associated impact on views westward from within the National Park across the rural landscapes to the Manchester conurbation. In such a case, the removal of Green Belt designation and new highway works might 'enable' development which would adversely affect the hinterland between the National Park and the conurbation</p> <p>In short, we believe that effects on 'openness' of the Green Belt is a detailed question that falls within the remit of the constituent Local Planning Authorities. The primary concern of the National Park Authority would be to ensure</p>

		that no additional land is removed from the Green Belt within the buffer of the National Park as an indirect result of the scheme.
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