

A57 LINK ROADS TR010034

**CPRE Peak District and South Yorkshire Branch
Unique Reference: 20029243**

DEADLINE 16 MAY 2022

COOMENTS ON DRAFT STATEMENT OF COMMON GROUND

BETWEEN THE APPLICANT AND TRANSPORT FOR GREATER MANCHESTER (TfGM)

The ExA's Rule 6 letter Annex E (19 Oct 2021) requires TfGM and the Applicant to prepare a SoCG for submission at Deadline 2 and for final updates to be submitted by Deadline 9 (27th April). The final update did not appear at Deadline 9 and was then expected to be submitted for Deadline 10. It did not appear. Nor did it appear for Deadline 11 on 11th May. We found the submission on the A57 Links Road website quite by chance at 17.22 on 13th May. This delay was also reflected in our request for a copy of the email from the Applicant on 4th April. We requested it again through ISH3 on 6th April, but despite a further request to the Applicant we did not receive it until 25th April. Consequently the fact that the SoCG appeared to contain serious issues relevant to the Examination did not become publicly available until Deadline 9, on 27th April. How serious was not revealed until the SoCG was published on Friday 13th May late afternoon.

The record of engagement shows almost weekly interaction between the parties but the draft SoCG has been submitted effectively one day away from D12 and the closure of the Examination – we found the submission by chance at 17.22 on Friday 13th May. We note that it is a draft SoCG yet to be signed by TfGM. **What we have before us is a document which introduces a number of critical issues not previously addressed by the Examination and challenges the assessment of the scheme at a fundamental level – the traffic modelling, the impact on transport networks, on air quality, on the PDNP and the European sites. As a consequence we believe it has placed the ExA in a most difficult position.**

The key issue hanging over the SoCG is to what extent TfGM is aware of the implications and consequences for Greater Manchester in what it has agreed to. The evidence produced for the Examination by CPRE has been sent to TfGM but we have not received a response. It is obviously relevant to the SoCG. The lack of engagement from TfGM is odd, given that they are the key transport authority. It has had the result that important evidence of direct relevance to them is not included in their dealings with NH. The ExA has expressed an interest in their view of our evidence, but none has been received.

Another omission is the failure of TfGM to fulfil its s.62 duty under the 1995 Environment Act to have regard to National Park purposes. It must explicitly demonstrate how it has fulfilled that duty. It is an IP and therefore could participate in the Examination. It should be required to do so in order for the ExA to be satisfied of the issues the SoCG has thrown into Examination.

In addition to addressing the contents of the SoGC we also refer below to the ExA's questions about it – Q3.5 which we quote here for ease of access. We have also answered the question in our rebuttal of NH's response to WQ3.

Q3.5 CPRE Peak District and South Yorkshire Branch [REP9-039] refer to an e-mail to Andrew Davidson sent in January 2022 which they consider identifies concerns that Transport for Greater Manchester wished to discuss further. The final Statement of Common Ground between the Applicant and Transport for Greater Manchester has not yet been agreed.

- a) Would the Applicant clarify whether the matters identified in the e-mail were discussed at a later date?
- b) What were the outcomes of those discussions?
- c) Does the Proposed Development address these matters?
- d) If so, how?
- e) Was the scope of the traffic model agreed with Transport for Greater Manchester?
- f) Is the Applicant aware of any design consideration which would conflict with the provision of a bypass of Hollingworth and Tintwistle?

The Applicant's answer

- a), b), c), d) The matters contained within the email referenced have been used as the basis for ongoing discussions with TfGM, discussions have progressed with items being resolved as part of the ongoing development of the SOCG. The final version of the SoCG with TfGM is scheduled to be submitted at Deadline 12.
- e) The scope for the traffic model has been developed using National Highways Regional Traffic Model, TfGM have not directly been involved in its development and have not raised any issues with the modelling.
- f) The current Scheme is included in RIS 1 (carried through to RIS 2) and is intended to deliver improvements to the Mottram area. Any further to deliver improvement to the wider areas of Hollingworth and Tintwistle would need to be considered in a future RIS and would need to take account of this Scheme.

Ref No	Issue	TfGM	NH response
10.19	TransPennine Tunnel and scheme that address Hollingworth and Tintwistle	We note that this is just Mottram – the question of Hollingworth/Tintwistle is still open. GM doesn't yet have a firm commitment to this however this A57 Mottram scheme needs to be implemented that ensures it is future proofed.	Scheme is about removing current issues of congestion and environmental effects in the village of Mottram; is standalone and not part of any wider transport improvements along the A57/ A628 corridor. There are further studies looking to assess Trans Pennine connectivity between Manchester and Sheffield, which sit outside the scope of the current scheme
<p>CPRE PDSY response</p> <p>TfGM has asked for future proofing of the scheme for an extension east to bypass Hollingworth and Tintwistle. This is a legitimate request given the GM Transport Strategy 2040 Delivery Plan 2021-2026 for the next 5 years – ‘Further interventions to tackle congestion issues in Tintwistle and Hollingworth To address congestion issues on the strategic A628 corridor and improve journey times and journey time reliability to South Yorkshire.’ TfGM’s concerns also reflect many of the comments made in response to the 2020 statutory consultation. Its request has not been addressed, rather deflected by reference to the Trans-Pennine Connectivity Study or Trans-Pennine Tunnel. This is looking at plans to dual the route between the M67 and the M1. In REP2-069 page 100 we summarised the study and explained the compelling need to scrutinise the whole strategic route in its entirety, particularly as it crosses a National Park. In that context, and the fact that TfGM have raised the issue of an extension east, it is risible to suggest this is a standalone scheme.</p> <p>The ExA’s WQ3 Q3.5f) also addresses the question of future proofing for an extension east. In response NH is slightly more revealing. <i>The current Scheme is included in RIS 1 (carried through to RIS 2) and is intended to deliver improvements to the Mottram area. Any further to deliver improvement to the wider areas of Hollingworth and Tintwistle would need to be considered in a future RIS and ‘would need to take account of this Scheme’.</i> (sic; our emphasis)</p> <p>How would future developments take account of the scheme? As proposed the scheme would deliver a dual carriageway between the M67 and Mottram Moor, exiting a tunnel and closely hugging the urban areas in a substantial cutting and ending in a huge new junction south of Mottram Moor. By contrast the design of the 2007 Mottram Hollingworth Tintwistle bypass was planned holistically and was substantially different. It was designed as a dual carriageway between the M67 roundabout and Mottram Pasture where it ended as a roundabout. It continued east to beyond Tintwistle as a single</p>			

carriageway. Between the roundabout on Mottram Pasture and the A57 Brookfield the Glossop Spur was a single carriageway – see two plans reproduced in Appendix A below¹ (the section between Mottram Moor and A57 Brookfield was developed separately by TMBC as a local planning application and is not shown on HE’s plans). The Glossop Spur met the existing A57T on Mottram Moor with a slight realignment. The 2007 layout for the eastern extension was thus greatly different from the proposed development which would ‘integrate’ the SRN with the A57T on Mottram Moor with a new ‘super junction’. If an eastern extension is developed, the proposed Mottram Moor junction would have completely different traffic patterns and probably lower levels overall. The economics for this scheme would therefore have been seriously exaggerated. This is yet another reason why the route must be looked at as whole, not in a piecemeal fashion. As CPRE said in its first submissions, breaking up proposals into individual sections for appraisal (the so-called “salami tactics”) was roundly condemned by the Government Advisory Committee on Trunk Road Assessment (SACTRA) as long ago as the 1980s. This case is an excellent good example of why they reached that conclusion and corridor studies have been used extensively since.

TfGM’s request has not been answered and the need for Trans-Pennine connectivity study to take account of the scheme raises substantial issues not previously been aired in the Examination.

10.20	Places for Everyone and Godley Green	Importance of considering Places for Everyone and wider area developments, particularly Godley Green	Traffic modelling for the current scheme as detailed in the Transport Assessment Report submitted as part of the application, shows that developments such as Godley Green are incorporated in the high growth scenarios; uncertainly logs were updated before the final runs of the traffic modelling were undertaken
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CPRE PDSY Response

Traffic modelling

The ExA also asked a question about the traffic modelling - WQ3 Q3.5e) *Was the scope of the traffic model agreed with Transport for Greater Manchester?* NH’s response is important context for the statement in the SoCG. *‘The scope for the traffic model has been developed using National Highways Regional Traffic Model, TfGM have not directly been involved in its development and have not raised any issues with the modelling’.*

Taking the SoCG and the answer to Q3.5e together it appears that TfGM has only been privy to the TAR. This is extremely worrying. We have submitted evidence that the TAR is not WebTAG compliant and is a poor substitute for a proper appraisal. It is only through our repeated requests for more information and MTRU’s work using that information that we could show how flawed the TAR and NH’s assessment of the scheme is. Evidence that was

¹ HIGHWAYS AGENCY A57/A628 Mottram-Tintwistle Bypass & A628/A616 Route Restraint Measures Public Inquiries Policies and Plans Volume 2 – Figures Presented on behalf of the Highways Agency By Geoff Webber BA (Hons), MIHT, MTEG (ICE), MRTPI

unknown at the start of the Examination has now been exposed. The SoCG is silent on TfGM's understanding as to what it has agreed to. This should be compared to the explanation supplied in 10.16 on the GM CAZ which is comprehensive. There is nothing in the NH/TfGM SoCG which recognises our analysis undertaken during the Examination which shows how the scheme benefits and encourages local car traffic which is the precise target for reduction by the Right Mix measures. Since TfGM has not been directly involved:

- Does TfGM know that the majority of Greater Manchester is excluded from the detailed traffic modelling?
- Does TfGM know that public transport (except for rail journeys relating to households with access to a car), walking and cycling are excluded from the traffic modelling?

If the participants to the Examination, who have been following the unfolding narrative, do not know what the impacts of the scheme are on Greater Manchester, then TfGM is most unlikely to.

Importance of Greater Manchester's Joint Plan *Places for Everyone* (PfE)

Again NH has not addressed TfGM's statement about the importance of considering PfE and wider area developments and only focused on Godley Green Garden Village. The fundamental approach which is underpinned by TfGM's Right Mix policy is to create low traffic neighbourhoods with 50% of trips by walking, cycling or public transport by 2040 (see our response to NH's response to Q10.24 below)

- This may happen partially in Mottram (but not on the north-south route where traffic increases) but what about other areas in GM where traffic would increase?

Godley Green Garden Village (GGGV)²

TfGM's concern about this is entirely reasonable. The proposed GGGV is the largest proposed development within Greater Manchester and 1Km from the scheme. Within the PfE plan period (2021-2037), the allocation is expected to deliver 1,188 dwellings, which will generate approximately 483 to 580 two-way vehicle trips during the morning and evening peak hours. Beyond the plan period, the allocation is proposed to deliver 2,350 dwellings and generate approximately 529 to 1,057 two-way vehicle trips during the morning and evening peak hours³. Clearly this is a major development which will interact with the scheme. How and where has NH assessed it within the scheme assessment?

² Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 Godley Green Garden Village pages labelled B1-B51 pdf pp83-127 - submitted as a separate document to the Examination

³ Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 page B26 para 10.1.2 pdf page 102/170 submitted as a separate document to the Examination

Firstly how GGGV has been included in the traffic modelling? NH says in the SoCG it is included in the high growth scenario. All 'reasonably foreseeable' developments are included in the high growth scenario (TAR 4.1.5). GGGV was assigned the status of a 'reasonably foreseeable' development and therefore included only in the high growth scenario. The high growth scenario is used as a sensitivity test for assumptions about the traffic modelling [D11 SoCG TfGM and NH; TAR 2.4.6] - it is the core scenario that is used to assess the scheme's impacts.

However the statement in the SoCG that GGGV was included in the high growth scenario does not concur with REP5-022 9.54.31 where NH explained its approach to traffic modelling for GGGV and implied the development was included in the core growth scenario:

*'The forecast traffic growth used for the assessment of the Scheme has been derived in full accordance with the latest best practice guidance contained in the Department for Transport's (DfT) Transport Analysis Guidance (TAG) and is based on the DfT's National Trip End Model (NTEM). NTEM provides forecast growth in trips based on forecast changes in the economy and demographics by area, e.g. forecast changes in population, car ownership, household spending, levels of employment, etc. NTEM therefore inherently accounts for future development since population growth cannot take place without additional housing development and economic growth cannot take place without additional commercial development. Therefore, **the traffic forecasts used in the traffic modelling that underpins the assessment of the Scheme inherently accounts for proposed developments in the vicinity of the Scheme, such as the proposed Godley Green development'** (our emphasis)*

When asked in WC2 TMBC indicated it was satisfied with this approach ().

For GGGV to have been included in *'the traffic forecasts in the traffic modelling that underpins the assessment of the scheme inherently accounts for proposed developments such as GGGV'* implies it is included in the Core Scenario. So how are we to align the statement in SoCG with REP5-022?

- Was GGGV included in the core scenario or not?

NH's assessment of the impacts of GGGV with the scheme appear in the A57 Link Roads ES Ch. 15 Cumulative Effects where GGGV appears in Table 15-4 row 42 where it is designated 'reasonably foreseeable'. This makes it a Tier 3b scheme, as defined in PINS advice Note 17 on Cumulative Impacts Assessment, version 2, 2019. For developments within *'Tier 3, the applicant should aim to undertake an assessment where possible, although this may be qualitative and at a very high level. The assessment should be carried out with reasonable effort and should be clearly documented in the ES for example using the format presented in Matrix 2 (Appendix 2' – not available on the PINS webs).*

However all the evidence suggests GGGV should have been included in the core scenario. GGGV has been a consistent allocation – it appeared in GMSF 2016 and in 2021 PfE. The consultation around GMSF 2016 informed the revision of PfE, and meant that the draft PfE post-consultation revisions would become the publication document for the EiP and a material consideration for the Examination. Furthermore documents accompanying PfE presented considerable evidence of the impacts of GGGV on the SRN dating back to November 2020. This was during the scheme’s statutory consultation and before the traffic modelling was finalised. The judgement of ‘reasonably foreseeable’ is also challenged by TMBC’s consultation in March 2019 consultation on GGGV and the submission of an outline planning application to itself TMBC 21/01171/OUT in October 2021.

Nevertheless GGGV was designated reasonably foreseeable and the only assessment of it appears in ES Ch15 Cumulative Assessments. This records no significant cumulative effect as a result of the scheme and the development. *‘Based on the information available, it is not expected there would be a significant cumulative effect as a result of the Scheme and this development’* [ES Ch.15 Table 15-7 row 42]. When the scheme is operational *‘This development is not within 200m of AQ affected road network, but **due to the scale of this development, there is a possibility it could generate traffic within AQ affected road network.** However, due to the tier allocated to this development...’* (our emphasis) The sentence is left unfinished.

The conclusion of ‘no significant cumulative’ effect is directly contrary to the PfE assessment which records that traffic generated by this allocation is *‘likely to result in material implications on the operation of the SRN that would require mitigation⁴’* at both the M67 J4 roundabout and M60 J24 Denton Island⁵. Although the former is part of the scheme the latter is not. These two diametrically opposed statements must be resolved. Since the work on these impacts on the SRN was undertaken in Nov 2020 NH must have been aware of it. Potential cumulative impacts on air quality and the GMCA’s AQMA are indicated in ES Ch.15 Table 15-4. The increases in traffic would alter the assessment of the M67 J4 presented to the Examination in REP2-022, WQ2 Q3.4 . The increases in traffic that would accompany the development could alter several threshold values for environmental assessment. It would only take an additional 40 AADT or 20 two-way trips along the A628T to South Yorkshire to tip traffic flows through the Tintwistle AQMA above the threshold for assessment. It would only take an additional 150 AADT or 75 two-way trips along the A628T to South Yorkshire to tip traffic flows on the road adjacent to the European sites above the threshold for assessment under the Habitats Regulations.

Events outside the Examination reinforce that the cumulative effects of GGGV and the scheme are significant. In response to TMBC’s planning application 21/01171/OUT noted above, on 29 April 2022, National Highways submitted a formal recommendation that planning permission is not granted for a

⁴ Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 page B32 para 15.2.1 and Table 9; pdf page 108/170 submitted as a separate document to the Examination

⁵ Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 page B33 para 15.3 onwards; pdf page 109/170 onwards - submitted as a separate document to the Examination

specified period (until at least 29 July 2022). *'At this time no further work has been undertaken to provide sufficient comfort that the development would not cause a detrimental impact to the SRN, though the developer's transport consultants are now beginning to work through the concerns that have been raised. To allow them to time to complete this work and for any residual matters to be picked up, National Highways recommend that this application continue to be placed on hold and that no determination is yet made'*.

The conclusions that NH reaches in ES Ch 15 regarding Godley Green Garden Village are diametrically opposite to those evidenced by PfE, underestimate the cumulative impact between the two developments and fail to mention the substantial impacts on the M67 and M60/Jn 24. Such a major development should have been included in the core scenario for scheme assessment. Its omission challenges the assessment of the scheme on several fronts - firstly, the full assessment of the cumulative impacts of the GGGV with the scheme and secondly the impacts on M60 J24 Denton Island. [Details in Appendix B below.]

Serious questions remain outstanding for the Examination:

- 1 Is the GGGV included in the modelling for the core scenario or not?
- 2 If not, how did NH arrive at the conclusions with respect to the cumulative impacts of GGGV with the scheme? Where is Matrix 2 as recommended by PINS for assessment of 'reasonably foreseeable' developments?
- 3 In its recommendation on planning application TMBC 21/01171/OUT NH has indicated *no further work has been undertaken to provide sufficient comfort that the development would not cause a detrimental impact to the SRN?* What possible detrimental impacts has caused NH to make its recommendation?
- 4 What effects could GGGV have on the scheme's performance? What assessment needs to be done to establish whether these are detrimental and require mitigation as identified by the Transport Locality Assessments for the Tameside Allocations?
- 5 What are the impacts of GGGV on the scheme's traffic flows? Elsewhere⁶ we have drawn attention to the underestimate of traffic flows on the M67 near junction 4 which NH have modelled as substantially lower than reliable counts from DfT. One of the spurious traffic flows in 2025 DM is along the A590 south of Ashworth Lane where a discrepancy of modelled flows 2,300 AADT appears to greatly under represent observed traffic flows of 6,200 AADT by 170%.
- 6 What impacts would the scheme and GGGV together have on the GM AQMA, and the Glossop Dinting Vale and Tintwistle AQMAs?

⁶ REP9-043 CPRE Deadline 9 comments on the Report on Implications for European Sites

- 7 Residents of the GGGV would have easy access to the SRN to travel to South Yorkshire and Sheffield – one of the scheme objectives is to increase connectivity between Manchester and Sheffield. What impact would the scheme and GGGV together have on traffic flows along the SRN travelling to the M1? Absolute traffic flows for DM and DS with GGGV included in the core scenario are required.
- 8 What impacts would traffic flows generated by the GGGV development have on the PDNP? Would they bring the traffic flows through Tintwistle village and the European sites above the threshold for assessment of air quality and nitrogen deposition respectively?
- 9 What are the impacts of the GGGV and the scheme together on the performance of M67 J4 roundabout? In REP NH presented
- 10 What is the impact on traffic flows along the A590?
- 11 What mitigation measures are required at the M67 J4 roundabout for GGGV without the scheme?
- 12 How do they differ from those proposed with the scheme?
- 13 What is the impact of the scheme alone, and of the scheme with GGGV development, on the M60 J24 Denton Island?

10.23	Climate emergency declarations, carbon targets and budgets.	<p>Please can NH provide a response to how the scheme will contribute to the Government’s Transport Decarbonisation Plan and GM / local carbon targets and budgets.</p> <p>At ISH 3 TMBC emphasised importance of local policy. Climate Emergency declarations are guiding local policy, should be a key consideration in planning and implementing transport infrastructure. Given that half of GM’s transport related carbon emissions are associated with the SRN and as the proposed scheme has an interface and impacts on the local network we consider it appropriate that an assessment of how this scheme would affect overall transport emissions in GM is undertaken. Any potential increase in emissions should identify proposals for how these could be offset elsewhere on the GM network and/or through other mitigation measures.</p>	<p>No legal duties which require particular geographical areas within the UK to achieve particular reductions in carbon emissions by particular dates. A net increase in emissions from a particular policy or project is managed within the Government’s overall strategy for meeting carbon budgets and the net zero target as part of an economy-wide transition; local budgets should not be important or relevant matters.</p> <p>Applicant not required to consider the significance of the Scheme against these regional targets. Climate Change Act does not include a statutory duty for local authorities to set budgets or deliver these reductions. Local and regional carbon budgets are not defined in the NPSNN, nor in the Climate Change Act or any secondary legislation, and an assessment against them cannot be undertaken. Local budgets not considered relevant when it comes to examining the suitability of the Scheme for its impact on ability to reduce carbon emissions.</p> <p>In ES Chapter 14 assessment of operational carbon emissions (REP1.019 Table 14.15) is based on EFT v10.1. In response to the request from TfGM, National Highways has prepared a table to split the predicted GHG emissions for Greater Manchester and for both</p>
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			EFT10.1 and 11 and has issued this to TfGM. However, the conclusion of our assessment is that the Scheme’s contribution to overall carbon levels is very low; its contribution will not have a material impact on the ability of Government to meet its legally binding carbon reduction targets.
<p>CPRE PDSY response</p> <p>TfGM has requested that an assessment of how the scheme would affect overall transport emissions in GM is undertaken. As we have shown, the traffic modelling as set up cannot undertake this assessment as the majority of GM is excluded from the Area of Detailed Modelling and the ARN for the assessment of GHG emissions. Given that half of GM’s transport related carbon emissions (highlighted above) are associated with the SRN this matter must be resolved with a proper assessment. Vehicle Kilometres increase with the scheme and so do carbon emissions. NH has indicated that local carbon budgets are not relevant when assessing the effects of the Scheme’s carbon emissions but it has prepared a table to split the predicted GHG emissions for Greater Manchester and for both EFT10.1 and 11 and has issued this to TfGM.</p> <p>This section of the SoCG raises a number of issues</p> <ul style="list-style-type: none"> • Why has the table showing the split of predicted GHG for GM not been presented to the Examination? It must now be presented as evidence. • The value of an assessment undertaken for TfGM is in doubt. It cannot have shown the full impact of the scheme’s GHG emissions as the majority of GM road network is excluded from the detailed assessment. • That such a table was prepared suggests that NH could do a regional/local assessment of the GHG effects which throughout the Examination it has refused to do. It should now do a regional/ local assessment and submit all the results for scrutiny. • What does the table show and what did TfGM think about the results it was given? The wording following the declaration that this table has been prepared - ‘However, the conclusion of our assessment is that the Scheme’s contribution to overall carbon levels is very low’ - suggests the table shows some strongly adverse results. We know from evidence presented by CEPP and MTRU on our behalf that the scheme’s emissions fall well short of making a proportional contribution to the trajectory for carbon reduction in the TDP and the UK’s NZS, which is alarming. • Is TfGM aware of all the shortfalls in the traffic model, the increase in the vehicle Kms with the scheme and the potential underestimation of the impacts of the scheme and its GHG emissions on GM carbon budgets and 2038 Net Zero GHG target? 			
10.24	Right Mix Targets	Please can NH provide a response to how the scheme contributes to GM’s Right Mix targets.	<ul style="list-style-type: none"> • GM Transport Strategy 2040 identifies the scheme

		<p>Right Mix does not assume net-zero traffic growth in all areas of GM. However, it is requested that National Highways identifies where any potential increase in traffic resulting from this scheme is offset elsewhere through other mitigation measures, to ensure the plans overall are contributing to Right Mix and the GMTS 2040 policy</p>	<ul style="list-style-type: none"> • Memorandum of Understanding between TfGM and NH to establish a complimentary highways network; more closely integrate the operation of the Strategic Road and Key Route Networks; deal with existing and potential bottlenecks on key highway links. • Right Mix vision sets out how modal trips are to be allocated using spatial themes, to secure an overall vision of 50% of trips to be made by sustainable modes. For City-to-City trips, Strategy acknowledges that active travel is not a realistic alternative and is targeting a 5% reduction in car mode share (page 84) from 87% currently to 82% by 2040. • Lists local improvements for WCH • By reducing congestion scheme offers faster more reliable bus journeys • Notes Right Mix does not assume net-zero traffic growth in all areas of GM and the request for offsetting traffic increases elsewhere on the SRN network and/or through other mitigation measures, to ensure the plans. NH commit to continue to work with TMBC and TfGM throughout the development of the detailed design and assess any updates or changes to relevant policy.
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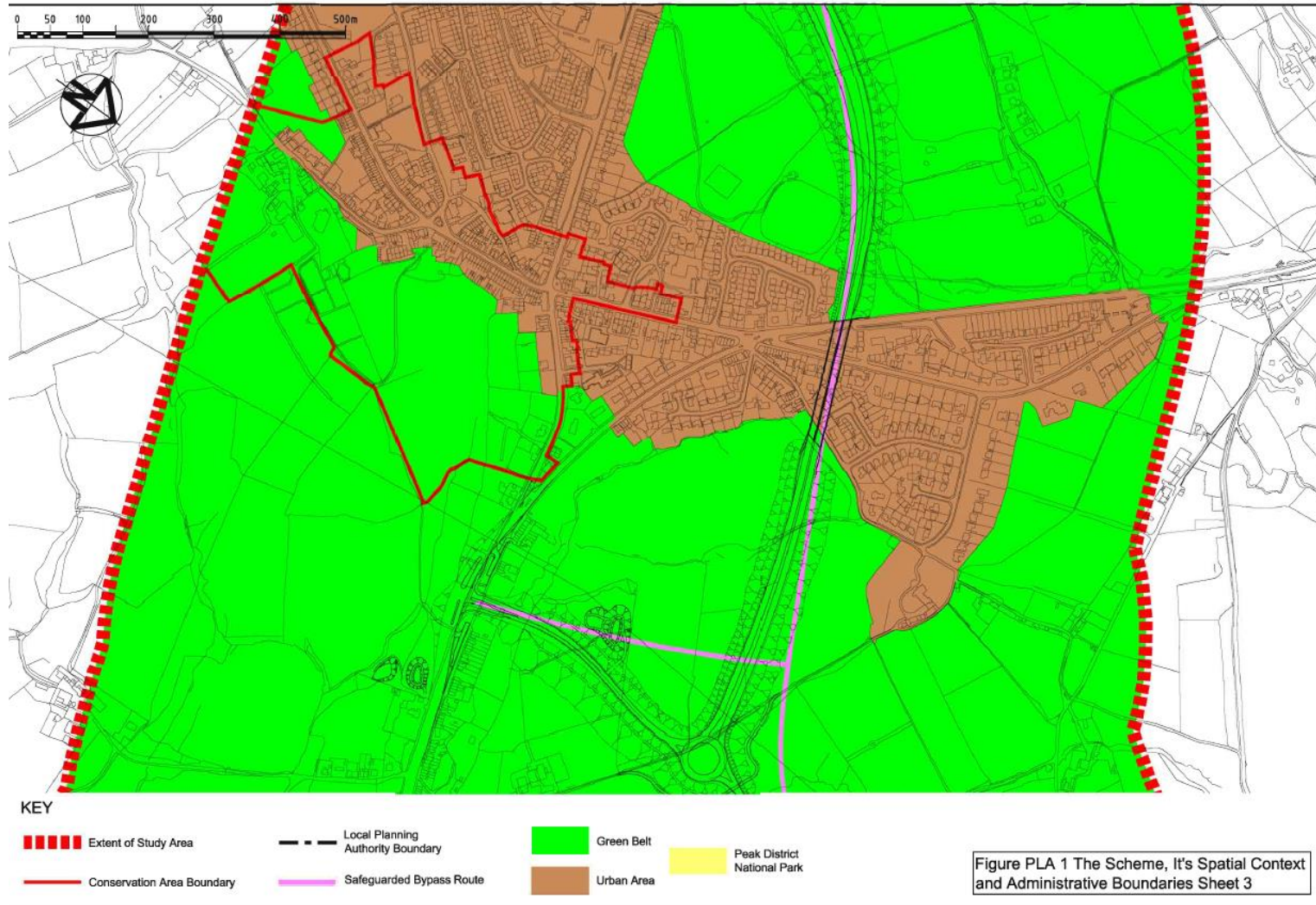
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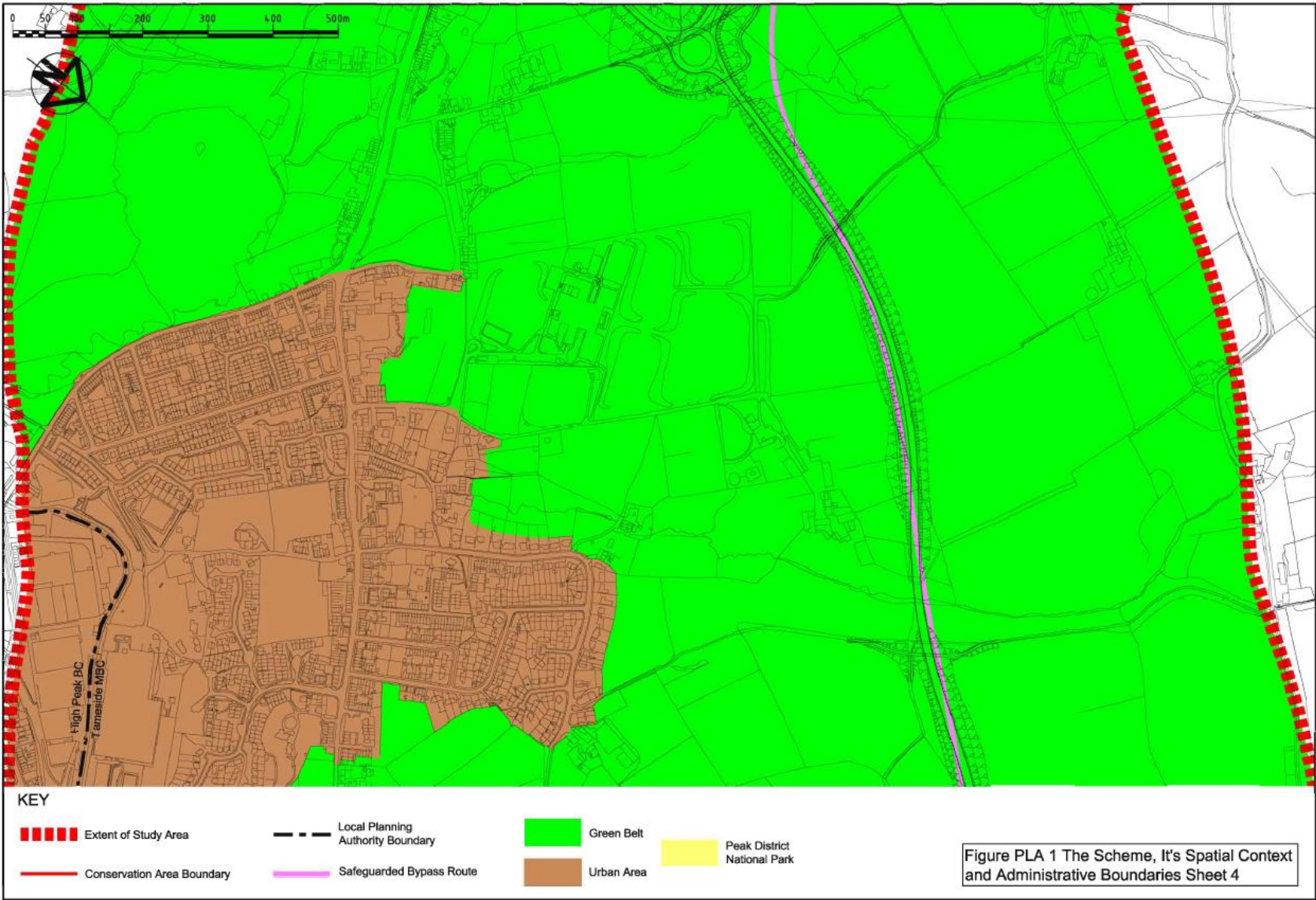
According to the SoCG NH have provided TfGM with a very limited view of how the scheme would impact on the Right Mix policy and has avoided the real impacts of the scheme on this policy. We have addressed these issues several times before. The Applicant refuses to see the scheme in its real context. Physically it is almost entirely within Greater Manchester and the vast majority of its traffic and the claimed benefits of the scheme are related to that area. The Applicant’s claim that City to City trips are important does not withstand scrutiny – as NH states these trips represent 6% of the journeys and of the benefits [REP9-040 Q3.3]. The Right Mix policy aims to reduce car trips and increase trips by walking, cycling and public transport by 50% by 2040 with a fall in traffic of around 17%. The assumption of traffic growth in the model is not in line with this document; therefore the scheme does not

meet its policy requirements. That the scheme is not supportive of these modal changes is also shown by the increase in vehicle kilometres - +84,000 veh kms in 2025 within the ADM; +39,000 veh kms within the local study area [REP8-019 9.75.6]. An increase in the local study area is particularly contrary to the Right Mix vision. The scheme would also increase bus journey times. It is worth repeating that NH has not included buses in the modelling.

- Does TfGM understand that we do not know how the scheme would impact on the Right Mix as the majority of GM is excluded from the detailed modelling? MTRU on behalf of CPRE has shown that the impacts would undermine the policy.
- Does TfGM understand that the scheme would undermine its aspirations for its Bee Network which seeks an integrated London-style transport system joining together buses, trams, rail as well as cycling and walking?

APPENDIX A





APPENDIX B

M67-M60 J24 Denton Island Interchange

The M67/M60 J24 interchange has long been recognised as a pinch point for congestion⁷ in need of improvement. Even without the Godley Green Garden Village proposals the M67-M60 J24 interchange proposals should have been included in the assessment of cumulative effects. The Transport Locality Assessments for Tameside Allocations document makes it clear that proposed changes to the M60 J24 Denton Island are part of the Trans-Pennine Upgrade. *‘Considerations as to mitigation at the M60 Junction 24 Denton Island form **part of the wider planned Trans-Pennine Upgrade, which is currently being investigated by Highways England’s Major Projects and the Department for Transport.** The Trans-Pennine Upgrade study does not account for the GMSF due to the lack of any planning status, although it is included in the Highways England Risk Register for the project⁸’* (our emphasis). The Trans-Pennine Upgrade was the previous name, until the 2020 consultation, of the A57 Link Roads. Therefore the M60 J24 should have been included in assessment of the cumulative effects on that basis alone.

With respect to the impacts of the GGGV on the interchange, a junction operational capacity analysis of the existing situation is not given, only an analysis with potential mitigation measures. The preferred option for the M60 J24 Denton Island is a grade separated flyover but, if this does not proceed, then an additional lane would be introduced although there are concerns that this *‘will not achieve the solution required and could make the situation worse⁹’*. With these the M60 J24 interchange would exceed or, approach exceeding, operational capacity in the morning peak. Adding in traffic from the Godley Green Garden Village leads to the interchange operating at above or approaching capacity¹⁰. It is apparent that Highways England has plans for mitigation measures at the M60 J24 interchange. The addition of the extra traffic generated by the A57 Link Roads – an extra 8,000 vehicles including an extra 500 HGVs every weekday in 2025 the opening year¹¹, plus the extra traffic generated by GGGV - to an already congested junction, mean the impacts on the M67-M60 J24 interchange and the proposed mitigation measures must be scrutinised by the Examination.

⁷ South Pennines Route-Based Evidence Strategy Report, Highways England, 2014, Figure 3; South Pennines Route Strategy, Highways England, 2017 p.29

⁸ Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 page B34, para 15.3.5; pdf page 110/170

⁹ Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 page B34 para 15.3.8; pdf page 110/170 - submitted as a separate document to the Examination

¹⁰ Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 page B32 Table 9 pdf 108/170

¹¹ A57 Link Roads, ES, Appendix 2.1 Traffic Data, AAWT Opening Year 2025