

Rt Hon Mark Harper MP
Secretary of State for Transport
c/o Kate Atkins
Transport Infrastructure Planning Unit
Department for Transport

By email to: A57LinkRoads@planninginspectorate.gov.uk

8th November 2022

Dear Secretary of State

Determination of the A57 Link Roads

The Secretary of State letter dated 24th Oct 2022 requested clarification and information from the Applicant as follows.

Point 7: Impacts of Godley Green Garden Village with the Scheme

With reference to point 7 of CPRE's Peak District and South Yorkshire Branch's letter dated 26 September 2022 in response to the Secretary of State's consultation letter of 3 October 2022, the Secretary of State invites the Applicant to comment on the matters which CPRE state have emerged since the close of the Examination.

The Secretary of State further invites the Applicant to provide the documents mentioned in the final paragraph of point 7; or to provide an update regarding when those documents will be finalised.

Matters we claim had emerged since the close of the Examination are as follows:

- (a) Updating of the research undertaken by Transport for Greater Manchester (TfGM) whilst the A57 Link Roads scheme was undergoing its 2020 statutory consultation, showed the severe impacts the scheme would impose on the Strategic Road Network (SRN) when combined with the proposed Godley Green Garden Village (GGGV) [REP12-028].
- (b) The Applicant's formal recommendation to Tameside Metropolitan Borough Council (TMBC)'s planning application 21/01171/OUT for GGGV that planning permission is



not granted until October 28th 2022¹ as it does not have confidence that there would not be a severe impact to the SRN, should this development proceed. As of 28th October, the Applicant has requested a further postponement of determination to 16th December 2022.

(c) Further investigation being undertaken by TfGM to produce ‘*Highways England Future Work Programme*’ to inform Places for Everyone.

The Applicant claims ‘*the A57 Link Roads application for development consent has appropriately considered Godley Green Garden Village (GGGV), is consistent with the evidence supporting the Places for Everyone (PfE) Joint Development Plan and ... that there is no new evidence that necessitates a delay in determining the A57 application.*’ We refute all these claims as follows.

OUR RESPONSE

1. *Inappropriate assessments*

(i) We first wish to refute the Applicant’s statement on page 4 of its response that ‘*For the avoidance of doubt the assessments completed to support the A57 Link Roads scheme and the PfE (Places for Everyone) have been appropriate for their respective purposes*’. In our view neither have been appropriate.

1a. Assessment to support the A57 Link Roads

(ii) The assessment to support the A57 Link Roads has been inappropriate as the Applicant has developed the scheme in isolation, quite separate from the strategic route of which it is a part. Development of the programme for the South Pennines road corridor has been broken into small chunks:

- (a) mitigation is being planned for 2025-2030² at the M60 J 24 where there is substantial congestion (see Table 13 below Reference case columns);
- (b) the A57 Link Roads is planned as a short bypass of Mottram;
- (c) a bypass of Hollingworth and Tintwistle is being explored through Greater Manchester’s Transport Strategy 2040 Delivery Plan 2021-2026 - ‘*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;*

¹ https://publicaccess.tameside.gov.uk/online-applications/files/7982E563901C85BCDC19119B2D9C0117/pdf/21_01171_OUT-CONSULTEE_COMMENT_-_NATIONAL_HIGHWAYS-1555101.pdf

² Transport Locality Assessment GMSF 2020 Table 13 Final list of interventions



(d) dualling of the A628T across the National Park with a short tunnel is being progressed by Transport for the North and the Applicant.

(iii) Each project is being assessed separately from the others, and on its own merits, through individual business cases. Yet a scheme which is part of a corridor can only be shown to deliver its strategic objectives if it is assessed as part of the whole corridor. Each scheme within the programme interacts with the other parts - a scheme may be independent of, complementary to, or compete with the other parts - all of which is material to the value for money. The combination of congestion costs and variable demand along with re-routing of traffic from individual projects would lead to complex findings. Claims that an individual scheme would unlock economic growth are unfounded because the programme for the whole corridor needs to be looked at - improving the whole corridor will prove costly and other projects would provide better value for money, as our *Low Carbon Travel for Longdendale and Glossopdale* has shown. Breaking up proposals into individual sections for appraisal (the so-called “salami slicing tactic”) was roundly condemned by the Government Advisory Committee on Trunk Road Assessment (SACTRA) as long ago as the 1980s. Hence the A57 Link Roads Project should have been developed and assessed within a programme for the entire trunk route between the M60 J24 and the M1 J35a/J36. This would have permitted an appropriate assessment, particularly within the context of the Peak District National Park and its nationally and internationally important environmental designations.

1b. Applicant’s failure to take full and proper account of GMVA’s Joint Plan

(iv) The Applicant has made serious errors with respect to recognising and integrating its plans for, and management of, the SRN with GMCA’s Joint Plan ‘Places for Everyone’. As public transport services determine urban mobility patterns, including modal choice, infrastructure developments such as the A57 Link Roads should be directly linked to strategic planning policy (as in the Joint Plan), which in turn informs local planning. Infrastructure alone cannot resolve transportation problems, especially if new infrastructure acts to encourage people to travel farther or more frequently (as the A57 Link Roads do). It needs to be integrated with, and pursued in support of, land use planning. This is encapsulated in DfT’s Decarbonising Transport, ‘*The planning system has an important role to play in encouraging development that promotes a shift towards sustainable transport networks and the achievement of net zero transport systems.*’ In support of this the Applicant through its licence is required to conform to sustainable development.



(v) In January 2019 (two years before the second statutory consultation on the A57 Link Roads) this approach was reinforced by GMCA³: *‘Greater Manchester will work with Highways England to ensure:*

- a. Improvements to the highways network are part of a multi-modal strategy to increase public transport, cycling and walking and improve access for all - as set out in the 2040 Transport Strategy Delivery Plan;*
- b. Any new infrastructure minimises the negative effects of vehicle traffic, to deliver environmental and health benefits; and*
- c. New infrastructure includes provision for utilities and digital infrastructure where required.’*

(vi) To achieve these sustainable outcomes, ‘Places for Everyone’ is supported by GMCA’s Transport Strategy 2040 Right Mix policy which aims for 50% of all trips to be made by public transport, walking or cycling by 2040⁴. The aim of these trips is to reduce short car trips on the SRN. The Applicant’s assessment of the A57 Link Roads ignored these policies in its assessment of the scheme, despite it being an urban scheme, and made no assessment of walking, cycling and public transport (apart from rail trips by car owners). The assessment of the A57 scheme clearly shows that the majority of benefits lie with car trips which are entirely within Greater Manchester⁵. These provide 55% of the total benefits from the proposed scheme’s economic analysis. (This is despite the limitations in these areas caused by the Fixed Cost Function and masking applied to the traffic modelling.) The Right Mix policy is also aiming for a 5% reduction in city-to-city trips but, with the scheme, intercity traffic between Manchester and Sheffield would increase on the A628T by 13% and on the A57 Snake Pass by 38%. The effect of the Applicant’s approach would be to increase car dependency, which is well documented to counter efforts to increase public transport, walking and cycling. Not only is the Applicant’s approach fundamentally contrary to GMCA policies, but had the Applicant taken account of these regional policies, the scheme’s benefits and its value for money would have been substantially reduced by the reduction in car trips.

(vii) The Applicant’s approach is also contrary to that which DfT has long promoted - a move away from a top-down projection of demand from the National Trip End Model (NTEM), which GMCA is also keen to see. TfGM would like to work iteratively in linking

³ Transport Topic Paper GMSF, Jan 2019, para 123

⁴ The updated GMCA Transport Strategy 2040 was published in Jan 2021 shortly after the A57 Link Roads second statutory consultation.

⁵ Low Carbon Travel for Longdendale and Glossopdale pp



its spatial, economic and transport strategies to achieve a prosperous city that meets wider environmental and social goals⁶. The Applicant's approach of working only with the NTEM undermines a shift to using more pluralistic scenarios with variation in demand, and in effect led to development of the A57 Link Roads in a silo. The Treasury Green Book requires a scheme to be developed within the context of the specific social and economic features of different places and how the intervention may affect them; and of other strategies, programmes or projects with which the intervention may interact, including in a particular geographical area. The Applicant has completely ignored these requirements and failed to integrate the A57 Link Roads with spatial planning.

(viii) There are therefore robust policy reasons to postpone the decision on the A57 Link Roads until the Applicant has assessed the A57 Link Roads project as part of the South Pennines corridor programme and with GMCA's Right Mix goals taken into account.

2. Exclusion of GGGV from the A57 Link Roads cumulative assessment

(i) According to ES Chapter 15 the Applicant used two guidance documents, PINS Advice Note 17 and the Applicant's own DMRB LA 104, when undertaking the cumulative assessment for the scheme. However, the Applicant interpreted their criteria in a narrow manner and took no account of the qualifications suggested when making that interpretation with respect to temporal issues and available information.

(ii) DMRB LA 104 defines cumulative impacts as '*Impacts that result from incremental changes caused by other present or **reasonably foreseeable** actions together with the project*' (our emphasis). In 3.21.2 DMRB lists which projects the assessment of cumulative effects should report on (proposed road schemes, proposals with planning permission, and/or in the adopted development plan). In 3.22 (2) '*it requires the assessment of cumulative effects to establish a list of projects which have the **potential to result in cumulative impacts***' and (3) '*obtain **further information and detail on the list of identified projects to support further assessment***' (our emphasis).

(iii) These criteria are qualified by two notes - *NOTE 2 There are no defined limits or criteria for selecting the list of projects for cumulative assessment. Professional*

⁶ Greater Manchester Transport Strategy 2040, published 2017, updated 2021, Appendix 1 Right Mix Technical Note; All Change? The Future of Travel Demand and the Implication for Planning and Policy, Commission on Travel Demand 2018

judgement using Annex III of the EIA Directive 2014/52/EU [Ref 1.N] can be applied and justification provided for developments selected (and excluded). NOTE 3 The temporal and spatial scope, together with characteristics of the identified projects, are key considerations in identifying projects that require further assessment.

(iv) Advice Note 17 Table 2 provides criteria that may be used to indicate the certainty that can be applied to each development that may have cumulative effects with a NSIP. The criteria are assigned in tiers which descend from Tier 1 (most certain) to Tier 3 (least certain) and reflect a diminishing degree of certainty which can be assigned to each development.

(v) The tiers relevant to GGGV are Tier 1 ‘submitted application not yet determined’, and Tier 2 ‘identified in the relevant Development Plan (and emerging Development Plans - with appropriate weight being given as they move closer to adoption) recognising that there will be limited information on the relevant proposals’. Advice Note 17 advises a proportionate assessment which takes into account:

- Temporal scope: e.g. whether there is overlap and any potential for interaction;
- Scale and nature of development: whether the scale and nature of the development are likely to interact with the proposed NSIP;
- Other factors: such as the nature and/ or capacity of the receiving environment;
- Documentation: The reasons for excluding any development from further consideration should be clearly recorded. This will provide decision makers, consultation bodies and the public with a clear record of the Applicant’s decision making process.

(vi) Based on these two documents, the Applicant considered GGGV as ‘reasonably foreseeable’, but allocated it to Tier 3, included it in the high growth scenario and excluded it from the core scenario and full assessment of its impacts. This result is inconsistent with informed interpretation of both DMRB and Advice Note 17.

Temporal issues

(vii) In order to justify exclusion of GGGV the Applicant uses the temporal argument that ‘*the proposed allocation and planning application for GGGV post-date the A57 Link Roads application*’. We agree that the planning application post-dated the DCO application by 3 months - the cut-off date for inclusion of developments in the cumulative impact assessment was agreed with PINS as 16 April 2021 [APP-071 para 15.4.15], but that is a technicality. We would expect TMBC and the Applicant to have



followed the requirements of Circular 02/2013⁷, the ‘Strategic road network and the delivery of sustainable development’, and undertaken engagement not only through the Planning for Everyone process but also at the pre-planning application stage. The Government has recently conducted a consultation (closed Sept 2022) on its proposed review of Circular 02/2013. However, both extant and revised documents highlight the importance of pre-application discussions *‘as an effective means of gaining a good, early understanding of any issues that might have a bearing on the way in which the development is planned and/or delivered. This, in turn, helps avoid delays and difficulties further into the application process.’* For larger and more complex sites, such as GGGV, the Circular recommends submission of a scoping report, outlining details of the development, and the proposed methodology for traffic assessment, its impact on the SRN and on the environment; and/or a meeting with itself.

(viii) It appears that the Applicant and TMBC have been following this approach and discussing the GGGV proposal since before the A57 Link Roads underwent its statutory consultation in Nov-Dec 2020 and long before the Applicant submitted its DCO application in June 2021. This is suggested by the Applicant’s letter in the Places for Everyone Statement of Common Ground with GMCA (June 2021) in which it confirms its commitment *‘to engage early and at all relevant stages of the preparation of local plans and development proposals’*. The Environmental Impact Assessment Scoping Opinion⁸ for GGGV submitted in Sept 2021 also suggests this assumption is correct: *‘In recognition of the significance of the project consultations have been undertaken with the following: Local Highways Authority, Highways England (HE), Transport for Greater Manchester (TfGM) and Network Rail.’*

(ix) By contrast the Applicant’s claim that the proposed Joint Plan allocation post-dates the A57 Link Roads application is incorrect. GGGV is a long standing proposal in an emerging spatial plan with material weight and with its developments proposals likely to come forwards. GGGV was included as an allocation for housing development in the Greater Manchester Spatial Framework consulted on in 2016. In the revised 2021 Joint Plan GGGV was retained as a similar allocation. The joint spatial plan provides ‘certainty’ for and identifies the amount of new development to meet

⁷ Circular 02/2013 gives effect to the statutory requirements of the Town and Country Planning Act 1990. It has legal effect and may also be considered important and relevant to decisions on Nationally Significant Infrastructure Projects (NSIPs).

⁸ Godley Green Garden Village Environmental Statement Appendix 2.2: EIA Scoping Opinion Sept 21 Chapter 12 pp8-9

GMCA's Local Housing Need over the plan period 2021-2037⁹. GGGV would supply 2124 dwellings or 13% of TMBC's commitment for 8,200 dwellings in order to contribute to the housing land supply. The proposed development is therefore a long standing persistent proposal, and has been under consideration for at least six years.

(x) The Applicant appears to extend its argument that the GGGV allocation post-dates the A57 Link Roads by claiming that when the environmental impact assessment for the A57 Link Roads was undertaken the site for GGGV was not allocated in TMBC's UDP. However TMBC's UDP 2004 is out of date with respect to allocating development, as the constituent authorities in the Greater Manchester Combined Authority (GMCA) have had a long history of collaboration and agreed in 2014 to adopt a statutory strategic approach to future development. Thus, the relevant emerging statutory plan is 'Places for Everyone' which will provide the framework for TMBC's local plan.

(xi) The Applicant also argues that the build-out of GGGV has no impact on the scheme since only 340 of the 2,124 dwellings proposed could be built out by 2025. However the scheme is assessed up to 2040, and the 'Places for Everyone' plan period is up to 2037 (possibly extended to 2038, 2040 or 2042) by which time the build-out would be significant, and would require mitigation on the SRN. The interaction of the scheme with GGGV throughout the time frame of 'Places for Everyone' is therefore of crucial importance.

Information and detail

(xii) DMRB advises obtaining further information and detail. There is no evidence that the Applicant referred to the 'Planning for Everyone' strategic transport assessment for GGGV which supplied significant information regarding GGGV's potential traffic impacts. This was available to the Applicant at the time of the 2020 statutory consultation on the A57 Link Roads, when the traffic modelling was still incomplete. The 2020 Transport Assessments and their updated versions accompanying the 2021 'Places for Everyone' consultation reveal significant strategic evidence of the impact of GGGV on both the M60 J24 Denton Island Interchange where the M67 joins the M60, and the M67 J4 where the A57 Link Roads would join the M67. The M60 J24 already operates well above capacity as Table 13¹⁰ shows (below, bottom row cells 1-2). The addition of GGGV substantially worsens this congestion (Table 13 bottom row, cells 3-

⁹ Places for Everyone Greater Manchester's Joint Plan Foreword page 3 October 2021

¹⁰ Tables 13 and 14 are taken from Transport Locality Assessments Addendum Tameside July 2021. The results are similar to those published in Nov 2020

6). The Applicant claims that Table 14 (below) shows the potential for improvement but with the each of the three options proposed for mitigation, M60 J24 would continue to operate well above capacity with severe congestion (Table 14 rows 1-2, cells 1-2). The M67 J4 appears to improve in capacity with the A57 Link Roads in place (compare Table 13¹¹ row 1, cells 1-2; vs Table 14, row1, cells 1-2). In addition, TMBC’s application is accompanied by a two-part transport assessment with three sets of appendices, which suggest the traffic flows as used within the 2020 and 2021 strategic assessments are robust.

Table 13. Strategic Junction Capacity Analysis Before Mitigation

Junction	Reference Case AM	Reference Case PM	PfE AM	PfE PM	Post-PfE AM	Post-PfE PM	PfE Flows AM	PfE Flows PM	Post-PfE Flows AM	Post-PfE Flows PM
M67 Junction 4 /A560 roundabout (with Bypass)	82%	89%	92%	98%	107%	106%	219	290	405	613
M67 Junction 3 / Clark Way	73%	89%	73%	89%	75%	85%	65	36	123	101
M60 Junction 24 Denton Island	283%	284%	276%	356%	290%	403%	236	277	473	605

Table 14. Strategic Junction Capacity Analysis After Mitigation

Junction	PfE AM	PfE PM	PfE Flows AM	PfE Flows PM
M67 Junction 4 /A560 roundabout	48%	42%	219	290
M60 J24 Mitigation Option 2	159%	173%	236	277
M60 J24 Mitigation Option 4	163%	248%	236	277
M60 J24 Mitigation Option 5	134%	194%	236	277

¹¹ According to the text below Table 13 in the Transport Locality Assessments Addendum the cell pertaining to the M67 J4 roundabout is labelled in error and should indicate that it is without the bypass, which is the proposed mitigation used in Table 14.



(xiii) Therefore at a strategic level a substantial assessment had been made about the impact the traffic generated by GGGV would have on the SRN and mitigation has been planned for it. This was available in sufficient time to have informed the cumulative assessment with GGGV.

(xiv) As DMRB and Advice Note 17 make clear, there are no defined limits or criteria for selecting the list of relevant other developments - professional judgement is required. We believe the Applicant failed to make the correct professional judgement and used technical criteria rather than a rigorous evidence-based approach to justify exclusion of GGGV from the cumulative effects assessment. The firm place of the GGGV allocation since 2016 in the emerging Joint Plan, the importance of allocations in the Joint Plan, the scale of the development and its known potential for cumulative effects, the extent of the strategic traffic assessments and the three years or more during which the Applicant and TMBC must have been liaising over the GGGV development, indicate GGGV should have been included in the core scenario.

(xv) Including GGGV would have profound impacts on the assessment of the A57 Link Roads. The assessment of the M67 J4 presented to the Examination in REP2-021, WQ2 Q3.4 shows that with the scheme queue lengths on various arms of the junction would lengthen. Increases in traffic generated by GGGV would further lengthen the queues. The increases in traffic that would accompany the development could also 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. We acknowledge that build-out of the GGGV site would be limited by 2025 but, given what we say about air quality below, in order to assess the real impacts of the A57 Link Roads robust analysis of the cumulative assessment of the scheme with GGGV is required.

3. Applicant's formal recommendation re TMBC planning application 21/01171/OUT

(i) The Applicant's original assessment of the impacts of the scheme with GGGV development, as presented in the DCO application in June 2021, was as follows. *'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'* [APP-071, ES Ch.15 Table 15-7 row 42]. In the revision of Chapter 15 [REP1-020] the Applicant came

to the same conclusion, with the exception of noise from traffic increases but for which insufficient information was available. At the time of the cumulative assessment the strategic transport assessments we have described above showing a profound impact of GGGV on the SRN were available to the Applicant.

(ii) In response to consultation with TMBC before the planning application was submitted the Applicant¹² stated (quoting its consultant WSP):

‘Given the significant size of the development and its location, they recognise that there is a high likelihood that traffic levels may impact the Strategic Road Network at different locations. The closest point would be the terminal roundabout of the M67 motorway, where it connects to the A57 trunk road. A scheme is currently proposed to bypass Mottram from this location, which may also be affected by these proposals. Development may also impact M60 J25, where proposals for mitigation are already being discussed in relation to the Bredbury Gateway site, and M60 J24 (Denton Island) which already suffers from traffic congestion during peak hours.’ (our emphasis)

(iii) These two assessments by the Applicant are completely contradictory. They indicate that even before the scheme began its examination in November 2021 the Applicant believed, contrary to its original statements in ES Chapter 15 [APP-071; REP1-020] there *‘is a high likelihood that traffic levels may impact on the SRN.’*

(iv) In line with this changed view, and since TMBC submitted its GGGV application, the Applicant has issued three formal recommendations to postpone determination of the planning application due to the uncertainty of traffic impacts on the SRN. The GGGV outline application itself revealed no new information - the Transport Assessment that accompanies the outline application indicates that traffic generation would be as forecast for the strategic Transport Assessment in 2020.

(v) The first recommendation on 29th April 2022 stated, *‘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.’* Thus, almost a year after the Applicant had reported there would be no significant cumulative effect between GGGV and with no further information about the traffic flows or the mitigation required that would alter the known impacts from the Places for Everyone

¹² Godley Green Garden Village Environmental Statement Appendix 2.2: EIA Scoping Opinion Sept 21 Chapter 12 pp8-9



Transport Assessments, the Applicant raised concerns about GGGV with the developer.

(vi) The most recent recommendation dated 28th October 2022 puts the decision on hold until 16th December 2022 in order *‘to enable the applicant to provide the information requested so that National Highways may make a determination of its impact on the Strategic Road Network.’* *‘We have met with the developer’s transport consultants since our last response, and they continue to develop their evidence base as part of an upcoming resubmission of the Transport Assessment. To give the applicant additional time to complete their report, and to ensure we have sufficient time to undertake a review, this application will need to remain on hold.’* It would appear fuller information is shortly to become available.

(vii) This debacle reveals that the Applicant concealed the serious impacts of the cumulative impacts of the A57 Link Roads with GGGV and reported them as insignificant despite the existence of robust strategic Transport Assessments. This is a serious attempt to mislead the examination, the Examining Authority and the Secretary of State.

(viii) It is obvious that the Applicant’s original 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. If there really was no significant effect why not wait until the full transport assessment is presented with the full planning application and then negotiate measures to reduce the impact of GGGV on the SRN?

(ix) In its response to the Secretary of State the Applicant has not resolved these two diametrically opposed statements. The emerging information coming forward through the outline planning application reveals the Applicant’s attempt to mislead those involved in the DCO democratic process as to the seriousness of the cumulative effects of GGGV and the A57 Link Roads. The decision on the A57 Link Roads should be postponed until the Transport Assessment for GGGV can be made available to the Secretary of State and interested parties for full and proper scrutiny.

4. GGGV’s impact on air quality

(i) In dismissing GGGV as having no significant effects the Applicant reported that 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, this development is currently allocated as tier 3 as a planning application has not yet been submitted and also the proposed phasing of the development is such that there would be limited development of the site in the Scheme opening year [REP1-020 - ES Ch.15 Table 15-7 row 42] (our emphasis). The AQ affected road network refers to Tameside's AQMA which covers the whole of the M67/A57/A628 trunk route (and Woolley Lane in Hollingworth).

(ii) This statement must be addressed as it has implications both for the air quality assessment of the A57 Link Roads and for the scheme's impact on TMBC's/GMCA's AQMA along the M67/A57/A628 corridor and on High Peak's AQMAs in Glossop and Tintwistle; and is yet another reason for full scrutiny of GGGV with the scheme.

(iii) Since the Examining Authority's report was published GMCA signed off on a new clean air plan on 18th August 2022 which indicates further delay in reducing air pollution. GMCA's most recent analysis in early 2022 (Clean Air Plan 4.1.18) revealed that second-hand van prices had increased by between 13% and c.60% since the modelling for the previous GMCA Clean Air plan had been undertaken, leading to fewer van owners willing to upgrade in response to the proposed charging Clean Air Zone; up to 40% increase in costs of upgrading buses to Euro 6 vehicles; and sales of new private cars had been lower than expected in 2021, reducing the natural rate of fleet upgrade, and leading to a delay in the predicted year of compliance for the previous GMCA Clean Air Plan. An urgent and fundamental review of the previous plan concluded it would no longer achieve compliance with legal limits for nitrous dioxide by 2024. Consequently, the Clean Air Plan has been revised to achieve compliance in the shortest possible time and by 2026 at the latest. It will undergo public consultation early next year.

(iv) GMCA's analysis of the future fleet and costs of upgrading vehicles raises serious and grave doubts about the management of air pollution along this corridor well beyond 2026, particularly as air pollution would remain well above legal limits on the A628T with the scheme in operation. The Applicant claimed repeatedly throughout the examination that its air quality assessment represents the 'worse case' scenario. Given GMCA's latest modelling results this appears unlikely.

(v) The Applicant has compounded the uncertainty around air pollution by refining the traffic model specifically to avoid air pollution so severe at three locations that it would jeopardise development consent. Two of these are AQMAs which, as a result of

the refinement, failed to meet the threshold for air quality assessment and no air quality assessment was made. As we showed throughout the DCO examination there is substantial evidence to challenge the Applicant's air quality assessment, which appears completely unacceptable. The implication of the impact of the GGGV on air pollution requires further assessment within the context of independent scrutiny of the traffic modelling.

5. Systra's 'Highways England Future Work Programme'

(i) The Applicant has not presented 'Highways England Future Work Programme' despite the Secretary of State's invitation for it to do so, or provided an update. We are told that the Systra document examines the potential implications of Greater Manchester's Joint Plan 'Places for Everyone' on the SRN, including every SRN link, junction, merge and diverge arrangement across Greater Manchester¹³. The Applicant describes this work as 'of critical importance to the transport evidence base. Only when this work is completed and has been reviewed, will National Highways be able to understand the impacts of Plan on the strategic road network'¹⁴. Thus, despite its authorship by Systra for TfGM, the Applicant views the document as critical. From its description the document could provide an independent source to inform and evaluate the authenticity of the traffic impacts of the A57 Link Roads.

(ii) Until Systra's 'Highways England Future Work Programme' is presented in full to the Secretary of State and interested parties we have no confidence that important, crucial information, is not being withheld from the decision-making process, concerning the junctions along this part of the SRN. The document must be made available to all stakeholders and interested parties with time for scrutiny.

(iii) That this document is being withheld is of serious concern. The Applicant has previously withheld documents that contain crucial information from public scrutiny (see paras 14-49 and Appendix C in CPRE's attached report on the Applicant's noncompliance with its licence). One example is our repeated requests over six months for background information on the transport appraisal and modelling for the scheme, which were only answered in November 2021 as the Examination opened. The Applicant then supplied us with the Combined Modelling and Transport Appraisal Report, the Economic Appraisal Package, the Transport Forecasting Report and the Transport Modelling Package for the A57 Link Roads [REP2-090]. As the Applicant had

¹³ GMCA3.1, 27 May 2022, <https://programmeofficers.co.uk/GMCA/ExaminationDocs/3.1.pdf> PfE response to Inspectors notes IN3, IN3.1 and IN3.2: preliminary questions to GMCA: legal, procedural and other general matters, page 125

¹⁴ GMCA's Joint Development Plan, Examination of Places for Everyone, IN8 page 18 Issue 3.3
<https://programmeofficers.co.uk/GMCA/IN8.pdf>



no intention of submitting the four documents we submitted them to the Examination. The Applicant claimed these were ‘*partial information*’ which ‘*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*’ [REP5-021 page 13]. In fact, all four documents were not ‘partial information’ but fundamental and essential background documents to understanding the ‘partial’ Transport Assessment Report, which is not fit for the purpose of examining a major highway scheme. Furthermore, they exposed concealed information with serious import. These concealments are listed in Appendix C in the noncompliance report and include the model ‘refinement’ to avoid air pollution and to redistribute traffic away from the A57 onto residential roads.

CONCLUSION

In order to address all the errors and inconsistencies we have shown above, the decision on the A57 Link Roads’ must at the very least be postponed. The decision to exclude GGGV from the full cumulative assessment appears to have been made on technical criteria rather than on an evidence-based approach using available strategic Transport Assessments. There are robust policy reasons, not least value for money, to require the Applicant to assess the impact of the scheme on GMCA’s Right Mix goals and its cumulative effect with GGGV. The Places for Everyone transport assessments that the Applicant regards as robust should be used to inform the assessment.

As we showed in our evidence submitted to the examination the Applicant’s assessment of air quality is unacceptable. New information has now emerged with respect to GMCA’s Clean Air Plan which challenges the Applicant’s claim of having assessed the worst case scenario. These two facts, coupled with the implied impact of the GGGV on air pollution, makes further assessment of air quality essential. It must however be preceded by independent scrutiny of the traffic modelling to understand the unresolved major discrepancies.

Systra’s ‘Highways England Future Work Programme’ and the Transport Assessment for GGGV should be presented in full for scrutiny by the Secretary of State and interested parties.

Finally, the Applicant has not resolved the two diametrically opposed statements we raised in our letter - the Applicant’s conclusion of ‘no significant cumulative’ effect of the GGGV with the A57 Link Roads is directly contrary to the Places for Everyone assessment that traffic generated by GGGV is ‘*likely to result in material implications*



The countryside charity
Peak District and
South Yorkshire

on the operation of the SRN that would require mitigation' at both the M67 J4 roundabout and M60 J24 Denton Island.

We remain of the view that a decision to proceed with the scheme would not be tenable. We strongly recommend a trial of the measures proposed in Low Carbon Travel for Longdendale and Glossopdale which could show that the Applicant's proposal should be abandoned.

Yours sincerely,



Anne Robinson
Campaigner

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