

**A57 Link Roads (previously
known as the Trans Pennine
Upgrade Programme)**

(TR010034)

Correspondence received after the close of Examination at 23:59 on 16
May 2022

Correspondence received by the Planning Inspectorate during the Decision stage (August 2022 to November 2022)

Ref.	Name	Organisation	Date
001	Michaela Bromley		03 August 2022
002	CPRE PDSY	CPRE PDSY	25 August 2022
003	Mr Oldham		26 August 2022
004	CPRE PDSY	CPRE PDSY	5 October 2022
005	High Peak Green New Deal	High Peak Green New Deal	6 October 2022
006	CPRE PDSY	CPRE PDSY	14 October 2022
007	CPRE PDSY	CPRE PDSY	19 October 2022
008	CPRE PDSY	CPRE PDSY	23 October 2022
009	CPRE PDSY	CPRE PDSY	26 October 2022
010	Linda Walker	High Peak Green New Deal	7 November 2022
011	Hayley Simpson		7 November 2022
012	High Peak Green New Deal	High Peak Green New Deal	7 November 2022
013	CPRE PDSY	CPRE PDSY	8 November 2022
014		Guard It All Limited	8 November 2022
015	Councillor Joanna Collins	High Peak Borough Council	10 November 2022
016	K Moss		11 November 2022
017	CPRE PDSY	CPRE PDSY	11 November 2022
018	CPRE Peak District and South Yorkshire	CPRE Peak District and South Yorkshire	11 November 2022
019	CPRE PDSY	CPRE PDSY	14 November 2022
020	Peter Simon		14 November 2022

Submission number: 1

Date submission received by PINS: 3 August 2022

Name: Michaela Bromley

From: webmasterdft=dft.gov.uk@ms9.ssmx.net on behalf of [WebmasterDFT](#)
To: [Contactdft](#)
Subject: General enquiry to Department for Transport
Date: 03 August 2022 20:49:56

An enquiry has been received from Michaela Bromley with the email of [REDACTED] and postal address of:

[REDACTED]

The enquiry is about:

A57 Link Roads

The details are:

I am contacting you regarding the proposed scheme for the A57 Link Road. This scheme could potentially effect my mothers home [REDACTED]

[REDACTED] She was born in the village of Mottram and has lived there all her life. She has lived in her home for over 55 years. This house is EXTRA special to us all (me, my daughter and extended family) as my late father built this house. This home is meant to stay in our family ALWAYS! It is extra special as I lost my dad in 1985 and my brother Craig in 1990. My mum has had all this to cope with along with the possibility of losing her beloved home. She has worked unbelievably hard to keep this home. How can a 90 year old lady be pushed out of our home after living there all those years! This is absolutely heartbreaking and making us all unwell! What would you do?! How would you deal with this?! This is a complex situation which no one seems to care or understand. Nobody has ever taken their time to either!!! I have been dealing with Highways for a number of years. Their treatment to me, my Mother and daughter who have all dealt with them is disgusting. I can not believe that an organisation which so critical to our country treats people so disgustingly. They should be ashamed!!! What are you going to do about this? The scheme is unbelievably pointless. First of all, it is going straight through countryside and a village. How is that helping the climate?! It is just moving traffic one mile down a road. Which in turn is going to encourage more traffic. Surely we are trying to reduce traffic not increase it. A weight restriction at A628 Woodhead Pass would relieve a majority of the traffic. The majority of the traffic is HGVs which don't need to be on this road. They should be on the M62. When the weather is bad closing the Woodhead the traffic is dramatically lighter. They could also reopen the Woodhead tunnel to get freight off the road. They could improve local transport links buses and trains. Creating more cycle routes, creating more cycle lock ups at transport links. Look at creating more park and rides. This whole scheme is being completed disgustingly. It is not engaging and asking the local community their opinions. It is constantly using COVID as an excuse not to do certain things. I am honestly disgusted at how this has been conducted! It is not been done in a proper and appropriate way! What are you going to do about this? how are you going to help me and my family? MY MOTHERS HOUSE IS ON THE BOUNDARY IT IS NOT EVEN ON THE ROAD. SURELY IT CAN BE SAVED! HOW CAN AN ELDERLY WOMAN BE DROVE OUT OF HER HOME? HOW IS THIS ACCEPTABLE? I HAVE LOST MY FATHER AND BROTHER I CAN NOT LOSE MY MOTHER BECAUSE OF THIS! THIS WILL HONESTLY BREAK MY MOTHER YOU DO NOT UNDERSTAND. THIS IS NOT JUST A HOME! THIS IS OUR LIVES! DOES NO ONE CARE YOU ARE EFFECTING OUR DAILY LIVES WITH THIS? MY MOTHER IS NOT MOVING

This email has originated from external sources and has been scanned by DfT's email scanning service.

Submission number: 2

Date submission received by PINS: 25 August 2022

Name: CPRE PDSY



The countryside charity
Peak District and
South Yorkshire

Mr John Larkinson
CEO, The Office of Rail and Road (ORR)
Office of Rail and Road
25 Cabot Square
London
E14 4QZ

[REDACTED]
[REDACTED]
Tel: [REDACTED]
[REDACTED]

By email: [REDACTED]

25th August 2022

Dear Mr Larkinson

National Highways non-compliance with its licence

CPRE PDSY is a branch of CPRE, the countryside charity. We believe in a thriving, beautiful countryside, rich in nature and playing a crucial role in the response to the climate emergency. Our goal is a countryside that's valued, enjoyed and understood by, and accessible to, everyone, wherever they live.

We write to bring to the ORR's attention that National Highways is non-compliant with several of its licence conditions with respect to the development of the A57 Link Roads. In the report accompanying this letter we present substantial evidence of poor behaviour which has prejudiced engagement with stakeholders and the public, and calls into question not only the integrity of the company but also veracity of the evidence for the Development Consent Order for the scheme. There is also evidence of failure to properly steward the future of this part of the Strategic Route Network, to ensure value for money, to protect and improve safety on the strategic and local road network, to co-operate with stakeholders, to conform to the principles of sustainable development and to comply with Government policy.

The non-compliance described represents not only a serious malfeasance but also demonstrates that the process through which the A57 Link Roads has passed has been both unlawful and encumbered by participatory unfairness making untenable any decision which might be made to proceed with the scheme.

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future

[REDACTED]
Registered Charity No.1094975 Registered Company No. 4496754



The countryside charity
Peak District and
South Yorkshire

This conclusion is also shared by our consultant, Keith Buchan of MTRU, a Chartered Transport Planning professional whose expertise, experience and persistence in understanding the evidence revealed much of what has been exposed. Without his engagement in the process, much would have been missed. Mr Buchan's view, which reinforces the findings of our report, was submitted as an open letter to the Examining Authority as the examination closed in May 2022. It can be read here <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010034/TR010034-001534-Keith%20Buchan%20-%20comments%20on%20submissions%20for%20Deadline%2011.pdf>

With respect to the A57 Link Roads, we urge the ORR to assess NH's performance in the light of our evidence to you and report its findings to the SoS before he makes a decision on the scheme in mid-November 2022. More generally we urge the ORR to enforce behaviour that is expected of a public body. In particular, we suggest that the ORR a) insists on, or provides, much more robust assessment and monitoring of scheme development from options appraisal through project business case, and b) reviews or instigates a review of the NSIP proposal and DCO process.

Although our report relates to an individual scheme - the A57 Link Roads - we are aware that other individuals and organisations have had similar experiences to ours with other schemes, including the Lower Thames Crossing, the A27 Arundel Bypass and the A66 Northern Trans-Pennine Project. National Highways general approach and behaviour also appears to extend beyond specific road schemes, given what was exposed through the recent national scandal of its management of the Historical Railways Estate.

We look forward to hearing from you as to how the ORR intends to address our concerns. We are copying this letter and the report to the Transport Select Committee and the Secretary of State for Transport.

Yours sincerely,



Anne Robinson
Campaigner

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future



Registered Charity No.1094975 Registered Company No. 4496754

Submission number: 3

Date submission received by PINS: 26 August 2022

Name: Mr Oldham

MR. C. OLDHAM

MP GRANT SHAPPS,
DEPARTMENT OF TRANSPORT,
GREAT MINISTER HOUSE,
33, HORSEFERRY ROAD,
LONDON
SW1P 4DR

24th August, 2022



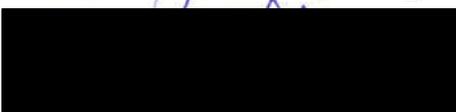
Dear Mr Shapps,

SUBJECT: A57 Link Road

More and more local residents are beginning to think that the Link Road will lead to more traffic and more carbon emissions, especially if more houses are allowed to be built in the P.T.O

area as a consequence of the
LINK ROAD. Someone has already
put in a proposal for 600-700
houses even before the AS7
LINK ROAD has been built.

All I am asking is before
a final decision is made on
the AS7 LINK ROAD all
other alternatives should be
reconsidered. If the LINK
ROAD goes ahead it should be
made clear that no in fill
house building is allowed. Let
the LINK ROAD do what it is
for.

Yours faithfully,


What will the A57 Link Roads bring to Hollingworth?

NO RELIEF FROM TRAFFIC AND MORE CARBON EMISSIONS

Hollingworth residents have been waiting years for relief from heavy traffic. But the proposed A57 Link Roads will not help. Traffic would reduce on Woolley Lane but heavy traffic, noise, illegal pollution and road crashes would continue to blight the rest of Hollingworth.

Weekday flows through the village would remain at 17,200 vehicles a day including more than 2,200 heavy lorries.

As new roads increase traffic the new super-junction on Mottram Moor (below) would soon be jammed with long queues through Hollingworth.



Carbon emissions would increase when they need to be reduced dramatically, to prevent runaway climate change.

In 2018 Highways England said it *'is unable to resolve'*, that Hollingworth and Tintwistle are not part of the solution. It has stuck to that line. But there is a solution that would help both Hollingworth and Tintwistle, as well as Mottram (see overleaf)...

The A57 Link Roads would cost £180 million; bring at least two years of disruption; and do nothing to solve our traffic problems.

Low Carbon Travel for Longdendale and Glossopdale

These are some of the steps which could be taken to reduce the traffic through the villages of Hollingworth and Tintwistle, through Glossop and on towards the Peak Park; and to make door-to-door journeys by bus, foot or cycle a realistic, attractive and convenient option.

- A weight restriction for heavy lorries on the A628 corridor, A57 Snake Pass and other cross-Park roads
- Slower speeds to make it safe and pleasant for walking and cycling
- Cycleway and footway improvements to create a coherent network for active travel and cargo-bikes, with links to Manchester's Bee Network .
- Integrated bus and rail services, with improved services and electric buses

Agree with us ? What can you do ?

It's not too late to tell the Secretary of State!

who will be making the final decision on the scheme in the Autumn

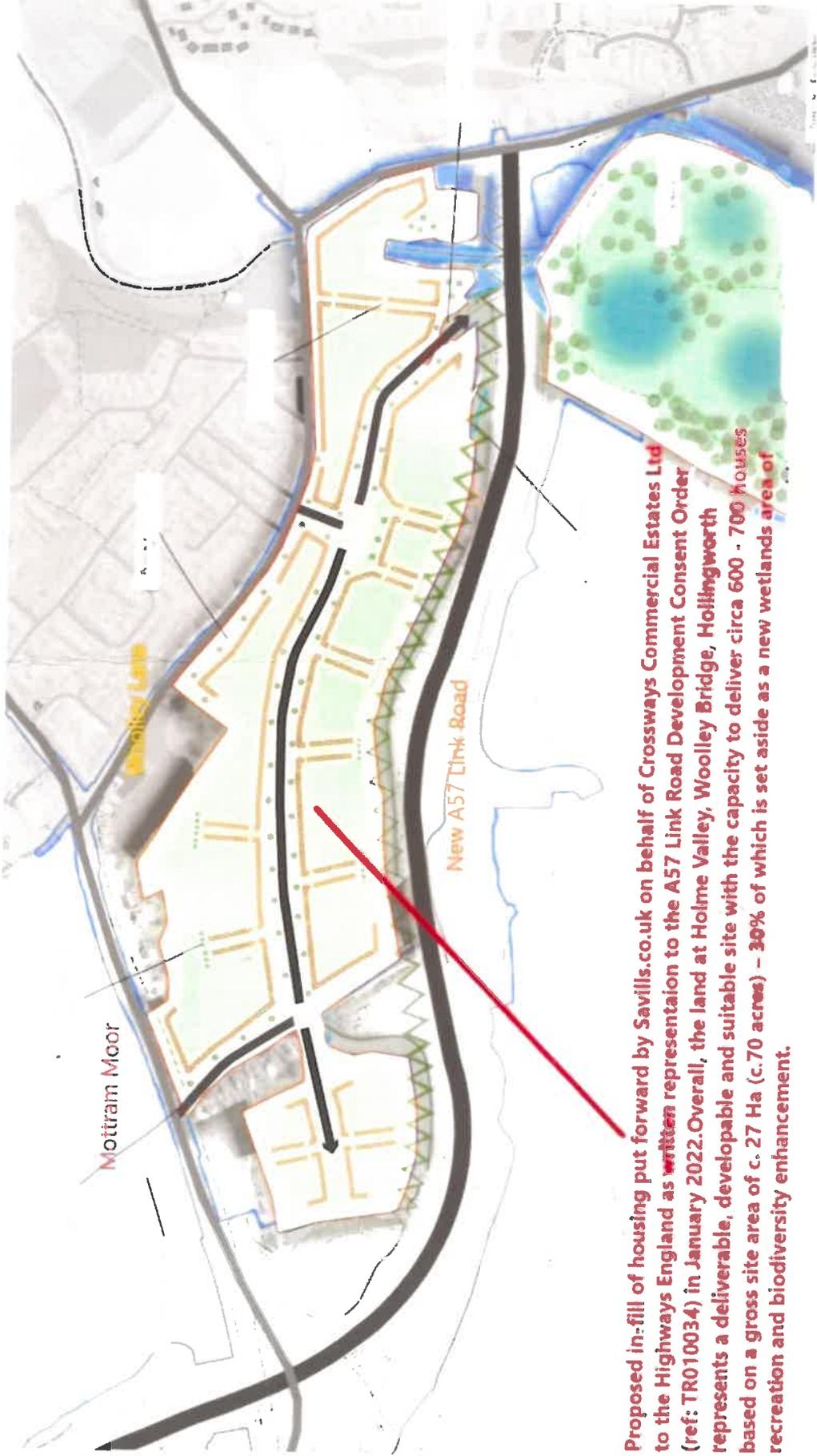
Sign the petition to Grant Shapps [Bit.ly/StopLink](https://bit.ly/StopLink)

Write to MP Jonathan Reynolds, House of Commons, London, SW1A 0AA



Contact highpeakgreennewdeal@gmail.com

This proposal should never be allowed to go ahead, it goes against the aims of the A57 Link Road. 600 -700 more homes could bring 600-900 more cars to the local roads each day. The families within these homes would also increase the need for more school places and increased pressure on local Doctors surgeries.



Proposed in-fill of housing put forward by Savills.co.uk on behalf of Crossways Commercial Estates Ltd to the Highways England as written representation to the A57 Link Road Development Consent Order (ref: TR010034) in January 2022. Overall, the land at Holme Valley, Woolley Bridge, Hollingworth represents a deliverable, developable and suitable site with the capacity to deliver circa 600 - 700 houses based on a gross site area of c. 27 Ha (c.70 acres) - 30% of which is set aside as a new wetlands area of recreation and biodiversity enhancement.

Kodak
Photo Paper

Kodak

"Highways England was represented by their Programme Development Manager, the Regional Road Safety Coordinator, the Head of Planning and Development, the Project Manager for Major Projects (including the A57), the Communications Officer and the Public Affairs Officer. Cllr Owens and I set out our concerns in detail.

"In response, Highways England reminded us that the likelihood of deregulation of the A628 is highly unlikely and therefore a range of other measures need to be introduced to tackle the issues.

"They described a pilot project focussing on the A64 (in North Yorkshire) which could provide a model for how traffic conditions could be addressed on the A628. It is called the 'village gateway' approach and there is a possibility of securing designated funding for addressing the safety, traffic congestion and environmental issues.

"Concerns about air quality were also discussed. Data gathered to date demonstrates that in 2019 there had been some improvement in nitrogen oxide levels. HPBC publishes the updates on their Air Quality Action Plan.

"We also discussed the consultation on the A57 Link Roads Project. It was acknowledged by Highways England that the project would not address the traffic volume issues endured by Hollingworth and Tintwistle. Indeed, it is more likely to exacerbate the traffic congestion, noise and poor air quality.

"We were informed that although a Tintwistle bypass does not form part of the programme, there is a 'Trans Pennine Study' and the resulting options are with the government for a decision on next steps."

On the agenda for Monday's parish council meeting, at 7pm, is the council's response to the A57 consultation. Councillors would welcome any residents who would like to join the meeting for this item

NOTES AFTER A VIRTUAL MEETING.

* THIS IS NOT GOOD !

**Written Representations to the A57 Link
Road Development Consent Order
(ref: TR010034)**

On behalf of Crossways Commercial Estates Ltd

Building More

Houses Around

HOLLINGWORTH

WOULD NOT

savills.co.uk



HELP THE SITUATION. !

Contents

1.	Introduction	2
2.	The Proposed A57 Link Road Project and Savills' Response to Consultations to Date	3
3.	Associated Development Potential	5
4.	Road Alignment Assessment	8
5.	Conclusions	10
	Appendices	11
	Appendix 1: Proposed New Sustainable Urban Extension Concept Sketch	12

1. Introduction

- 1.1. These written representations have been prepared by Savills (UK) Ltd on behalf of Crossways Commercial Estates Ltd who are the freehold landowners of part of the wider site which is affected by the proposed A57 upgrade – Land Registry Title reference GM917343.
- 1.2. These written representations are submitted in accordance with deadline 2 of the Development Consent Order application ref: TR010034 for the proposed A57 Link Road.
- 1.3. It must be noted that the proposed A57 Link Road will facilitate the provision of a strategic 'infill' residential development opportunity to come forward, in the form of a new sustainable urban extension (SUE) adjacent to the north. In doing so, the proposed A57 Link Road will provide a strong defensible boundary which will limit the encroachment of the countryside in this location. The provision of a new SUE in this location will help to meet the acute housing needs of the local area and Greater Manchester as a whole. These written representations should therefore be read in this context.
- 1.4. Throughout the various consultation stages in respect of the A57 Link Road Savills have, on behalf of our client Crossways Commercial Estates Limited, continued to confirm support to the proposed A57 Link Road project in principle. However, in the interests of avoiding the sterilisation of some of the land to the north of the proposed A57 Link Road, which is considered to otherwise have development potential moving forward, Savills have outlined a strong preference for the proposed 2018 road alignment over the more recent proposed 2020 road alignment. Our comments specifically request the need for the applicant to:
 1. Relocate the proposed signalised junction southwards at its Woolley Bridge tie in as per the proposed 2018 designs; and
 2. Relocate the proposed River Etherow crossing further southwards as per the proposed 2018 design.
- 1.5. The remainder of this Report is set out as follows:
 - Section 2 summarises Savills' response to the previous consultations (2017, 2018 and 2020);
 - Section 3 outlines the development potential associated with the proposed Link Road;
 - Section 4 sets out Savills' response to the A57 Link Road proposals; and
 - Section 5 summarises the position including recommendations.

2. The proposed A57 Link Road and Savills' response to consultations to date

Benefits of the A57 Link Road

- 2.1. We believe the scheme is an essential road infrastructure improvement which will boost connectivity and improve links between the two key northern cities of Sheffield and Manchester. This infrastructure investment is therefore considered to help, in turn, with the delivery and ambitions of 'the Northern Powerhouse'.
- 2.2. It is estimated that around 25,000 vehicles travel along the A57 through Mottram every day, including over 2,000 HGVs. The proposed A57 Link Road is therefore considered to also help to tackle the existing congestion issues in this location by separating Glossop traffic from vehicles traveling over the Pennines and along the A628 Woodhead Pass. This stretch of road forms part of the 25 mile Trans Pennine route between Manchester and Sheffield. More broadly the proposed A57 Link Road will direct traffic away from the settlements of Mottram, Stalybridge and High Peak to create capacity in the local network and should therefore make journeys more reliable.
- 2.3. The proposed A57 Link Road will also improve the air and noise quality of the existing environment, given the dominant source is stagnant road traffic associated with the existing road network. As a result, the local area will become more attractive to existing and future residents and should become a healthier environment for all.
- 2.4. The new road infrastructure will also create further investment opportunities across the region and in settlements which have been starved of inward investment over recent years, helping to benefit the local communities. The road will also facilitate new development opportunities in settlements along the new road including Hollingworth and Woolley Bridge which to date have been somewhat restricted, given the lack of adequate infrastructure. As a result of the proposals Hollingworth and Woolley Bridge would represent clear opportunities for growth, given they are sustainable settlements with a range of services, and with the new capacity created on the local road network.
- 2.5. The proposed A57 Link Road is therefore supported in principle. Notwithstanding this, as outlined above, there remains some concerns with elements of the proposed road alignment, specifically in the interests of avoiding the sterilisation of land which it's considered could otherwise have development potential. As such, the following amendments are proposed in respect of the proposed road alignment:
- The relocation of the signalised junction southwards at its Woolley Bridge tie in as per the 2018 designs; and
 - The relocation of the River Etherow crossing further southwards as per the 2018 designs.

Overview of Consultations and Savills' response to date

- 2.6. Savills, on behalf of our client CCE, have submitted several consultation responses to date which can be summarised as follows:

Written Representations to the Development Consent Order Ref: TR010034 – A57 Link Road

2017 Consultation

- 2.7. Focusing on improvements on the A628 and A57, a preferred package was publicised in 2017. The largest investment planned was at the western end of the Trans Pennine route with the introduction of a bypass / proposed A57 Link Road at Mottram which seeks to reduce traffic flows through the village, and will help to ease issues of congestion, noise pollution, air pollution and severance.
- 2.8. In respect of the A57 Link Road, two options were consulted on, Option A and Option B. As part of our written representations in 2017, Savills supported Option A. Option A proposed a new dual carriageway link from the M67 terminal roundabout to a new junction at A57(T) Mottram Moor near the junction with Back Moor, and a single carriageway link from the new junction at A57 (T) Mottram Moor to a new junction on the A57 at Brookfield.

2018 Consultation

- 2.9. Option A was brought forward as the preferred option and consulted on during 2018. Within our representations we re-confirmed our full support to this proposed road alignment.

2020 Consultation

- 2.10. The 2020 consultation exercise unveiled an updated design that sought to relocate the proposed A57 Link Road further northwards at the eastern end of the scheme.
- 2.11. As set out within our written representations in 2020, we raised concerns with the proposed changes to the River Etherow crossing and Woolley Bridge junction, noting a preference to revert back to the 2018 version to avoid the sterilisation of potential development land to the north of the road.
- 2.12. The most detailed justification provided by National Highways (NH) for the changes in alignment were provided in the Preliminary Environmental Information Report (PEIR) initially published in the 2020 consultation exercise and also now submitted in 2021 as part of the DCO process.
- 2.13. The proposed amendments and associated justification for doing so can be summarised as follows:
1. NH was able to work with the Environment Agency regarding the River Etherow (and the associated floodplain) in order to shorten and simplify the bridge span requirements for the proposed River Etherow bridge needed.
 2. NH re-modelled, redesigned and re-located the A57 Link Road/Woolley Bridge junction layout to bring a consented development into the junction, to create a signalised crossroads.

3. Associated Development Potential

- 3.1. As outlined in previous sections of this report, the proposed A57 Link Road will create the opportunity for the provision of a strategic 'infill' opportunity to come forward, in the form of a new SUE to the north of the proposed A57 Link Road whilst at the same time, it will provide a strong defensible boundary which will, by virtue of its existence, naturally limit the encroachment of the countryside in this location. The provision of a new SUE in this location will help to meet the acute housing needs of the local area and Greater Manchester as a whole.

Site Context and Description

- 3.2. This section relates to the site which is situated to the north of the proposed A57 Link Road which we believe should be considered as a potential infill SUE, should the proposed A57 Link Road go ahead.
- 3.3. The site has various landowners, one of which is our client CCE.
- 3.4. The site measures approximately c.27 Ha (gross) and comprises agricultural land. The site is situated on the western edge of Hollingworth, c. 8km south east of Ashton-Under-Lyne.
- 3.5. The site is strategically situated along the proposed route for the A57 Link Road which seeks to facilitate people travelling along the vital Manchester to Sheffield Trans-Pennine route by reducing congestion and therefore the overall travel time. It's understood that this scheme is part of a wider £242 million improvement plan to improve the Trans Pennine route.
- 3.6. The character of the immediate area is predominantly residential with a number of shops and services located along Market Street, north of the site. There are also a number of designated employment areas within Hollingworth, the closest of which is located approximately 200 metres south of the site. Additionally, agricultural land lies to the west of the site.
- 3.7. The site is currently situated within the Green Belt however representations have been made to support the release of the site from the Green Belt in response to the emerging Greater Manchester Spatial Framework (GMSF). The site is therefore being actively promoted for residential development by the various landowners. The proposed A57 Link Road is also therefore located within the Green Belt however it is accepted that the proposed A57 Link Road forms a key part of proposed road improvements to the western edge of Hollingworth. Through careful design, the proposed development site/ SUE would also benefit from the proposed road improvements which will in turn facilitate in the delivery of a rational and logical infill development, to the north of the proposed A57 Link Road.

Deliverability

Access

- 3.8. It is considered that there are a number of potential points of access for the proposed residential development/ SUE, all of which utilise the existing highway network and as a result, it is considered that the proposed SUE is not solely reliant on the proposed A57 Link Road as a direct means of access. Notwithstanding this, it is considered that additional access points could be sought from the proposed A57 Link Road should this be considered necessary/appropriate moving forward. A detailed transport assessment and accompanying access drawings will be worked up to inform a detailed design in due course, following confirmation of the A57 Link Road route moving forward. The relationship between the proposed residential development/SUE and the proposed A57 Link Road is therefore to be discussed and agreed further moving forward.
- 3.9. In terms of public transport, the site is well located being approximately 1.7km from Dinting Train Station which offers a 20 minute frequency of trains to Manchester city centre. There are also a number of bus stops located adjacent to the site offering hourly services to Ashton-Under-Lyne and Glossop. The access to a range of public transport modes makes the site easily accessible and the site can therefore be described as being located within a sustainable location.

Ecology and Landscape

- 3.10. The proposed development site/SUE will aim to make a positive contribution towards the management and enhancement of the surrounding landscape. The position of the site provides the opportunity for high quality infill development in conjunction with the construction of the proposed A57 Link Road. The proposed A57 Link Road would be a defensible boundary to prevent any encroachment into the countryside beyond the proposed road to the south.

Flood Risk and Drainage

- 3.11. The majority of the site is located within Flood Zone 1 as shown on the on the Environmental Agency's Flood Zone Map which indicates that the site has low probability of flooding.
- 3.12. The River Etherow runs through the southern part of the site and a small proportion of the site located within Flood Zone 3. Notwithstanding this, it is important to note that the proposed developable area will only incorporate land within Flood Zone 1.
- 3.13. It is therefore considered that there are no fundamental issues in respect of the principle of development, in drainage terms, the proposed development will ensure run off rates are controlled to greenfield levels to safeguard against exacerbating any current issues.

Heritage

- 3.14. The site is not located within proximity to a Conservation Area.

- 3.15. There are a small number of listed buildings within Hollingworth, the closest of which is located directly adjacent to the site, Grade II listed Woolley Farmhouse (UID: 1356438). However, the setting of this listed building has been eroded through surrounding mid - late 20th Century development and could potentially be impacted by the proposed A57 Link Road in any event. The proposed development can be designed to mitigate any perceived adverse impacts on the listed building itself and its setting as required.

Site Benefits

- 3.16. Overall, the land at Holme Valley, Woolley Bridge, Hollingworth represents a deliverable, developable and suitable site with the capacity to deliver circa 600 - 700 houses based on a gross site area of c. 27 Ha (c.70 acres) – 30% of which is set aside as a new wetlands area of recreation and biodiversity enhancement.

- 3.17. The site will deliver multiple benefits back to the wider Holme Valley and community, as set out below:
- Strategically situated along the route for the proposed A57 Link Road which is a part of improvements to facilitate people travelling along the vital Manchester to Sheffield Trans-Pennine route;
 - Given the location of the site and the settlement pattern of the area, the proposed development would not result in neighbouring towns merging. This would be re-enforced following the construction of the proposed A57 Link Road given it would then become the defensible boundary.
 - Inward socio-economic investment including an additional c. £600k on education contributions and on leisure spending;
 - Through careful balance of open space (both amenity and recreational) the proposed scheme would offer the opportunity for improved community health; and
 - Given the place-making opportunity for the development, it would contribute towards the concept of the walkable neighbourhood and sustainable living patterns.

- 3.18. In 2020 and as part of the Greater Manchester Places for Everyone Consultation, Savills set out the landowner consortium's intention to promote the site for residential development. As part of the detailed representations which established the site was deliverable and developable, Savills produced a concept sketch which explores the physical and environmental character of the site and sets out how the proposed SUE can be brought forward in a way that enhances the surrounding area. Please refer to the Concept Sketch at **Appendix One** in this respect.

- 3.19. Taking a holistic approach, we propose that the proposed SUE is therefore considered as part of the on-going DCO application. The proposed A57 Link Road needs to be suitably integrated within the comprehensive masterplan to ensure the long term sustainability of the area.

4. Road Alignment Assessment

- 4.1. In order to accurately compare the two different road alignments put forward by NH, we have produced the plan below which overlays the proposed 2018 road alignment with the proposed 2020 road alignment:



Figure 1: 2018 road alignment vs 2020 road alignment

- 4.2. Figure 1 demonstrates that the 2020 road alignment requires a larger land take for the signalised junction as well as the proposed relocation of the River Etherow crossing further northwards, closer to existing properties within our client's ownership and reducing the net developable area of a proposed SUE development in this location.
- 4.3. The 2018 road alignment was located further south than the revised 2020 alignment, by approximately 40 metres. The 2018 alignment would therefore enable a more comprehensive SUE development to be brought forward. In turn, the proposed SUE development would respond more effectively to the under supply of homes within the Tameside District and therefore help to future-proof the delivery of homes in this location moving forward to a new Local Plan.
- 4.4. In contrast, the new 2020 road alignment instead leaves a larger sterilised triangular area of land to the south west of the junction, bordering the River, and reduces the net developable area of the proposed SUE by approximately 4,000 square metres/ 0.4 Hectares. Taking this point further, based on average density of 35 dwellings per hectare this could equate to a loss of c. 15 residential units.
- 4.5. It is therefore evident that the 2020 proposals have reduced the net developable area of the proposed SUE, and in turn of the landowners (including our client's land), and arguably the 2020 proposals would therefore stifle the development potential in this location. Adequate compensation would need to be received by the landowners as a result of this reduction in net developable area caused by the proposed 2020 road alignment.
- 4.6. It is also worth noting that the 2020 road alignment will adversely affect more existing residential properties than the 2018 road alignment due to its location further north, and therefore the applicant will be liable to making greater Part 1 compensation claim payments in accordance with the Land Compensation Act (1973). As a result, the increase in compensation payments will increase the cost of the proposed 2020 scheme in comparison to that of the 2018 scheme.
- 4.7. Taking a holistic approach, it's considered that the proposed SUE should be considered as part of the outstanding DCO application. In this context we kindly request that the 2018 alignment is progressed as opposed to the 2020 alignment, particularly in respect of the proposed River Etherow Crossing and signalised junction at Woolley Bridge. Both of these elements of the proposed A57 Link Road should be carefully considered to ensure that the proposed road is suitably integrated within the comprehensive masterplan to ensure the long term sustainability of the area.

5. Conclusions

- 5.1. These written representations have been prepared by Savills (UK) Ltd on behalf of Crossways Commercial Estates Ltd in respect of land at Holme Valley, Woolley Bridge, Hollingworth in response to the Development Consent Order application relating to the proposed A57 Link Road ref: TR010034.
- 5.2. The proposed development site/ SUE to which the proposed A57 Link Road would adjoin would represent a deliverable, developable Sustainable Urban Extension with the capacity to deliver circa 600 - 700 houses based on a gross site area of c. 27 Ha (c.70 acres).
- 5.3. The proposed development site/ SUE will deliver multiple benefits back to the wider Holme Valley and community, as set out below:
- Strategically situated along the route for the A57 Link Road which is a part of improvements to help people travelling along the vital Manchester to Sheffield Trans-Pennine route;
 - Given the location of the site and the settlement pattern of the area the development of the land would not impact on neighbouring towns merging. This would be confirmed once the Link Road is built as it would become the defensible boundary.
 - Inward socio-economic investment including on additional c. £600k on education and on leisure spending;
 - Help meeting the acute housing needs of the area and Greater Manchester as a whole;
 - Through careful balance of open space both amenity and recreation the scheme would offer the opportunity for improved community health; and
 - Given the place-making opportunity for the development it would contribute towards the concept of the walkable neighbourhood and sustainable living patterns.
- 5.4. While we support the proposed A57 Link Road in principle, in the interests of avoiding the sterilisation of land proposed as an SUE, located to the north of the road, it is considered that the proposed 2018 road alignment should be progressed in respect of the Etherow river crossing and Woolley Bridge junction as opposed to the alternative 2020 road alignment, to fully maximise the net developable area of the proposed SUE and the associated benefits that this new road infrastructure will bring.

Appendices

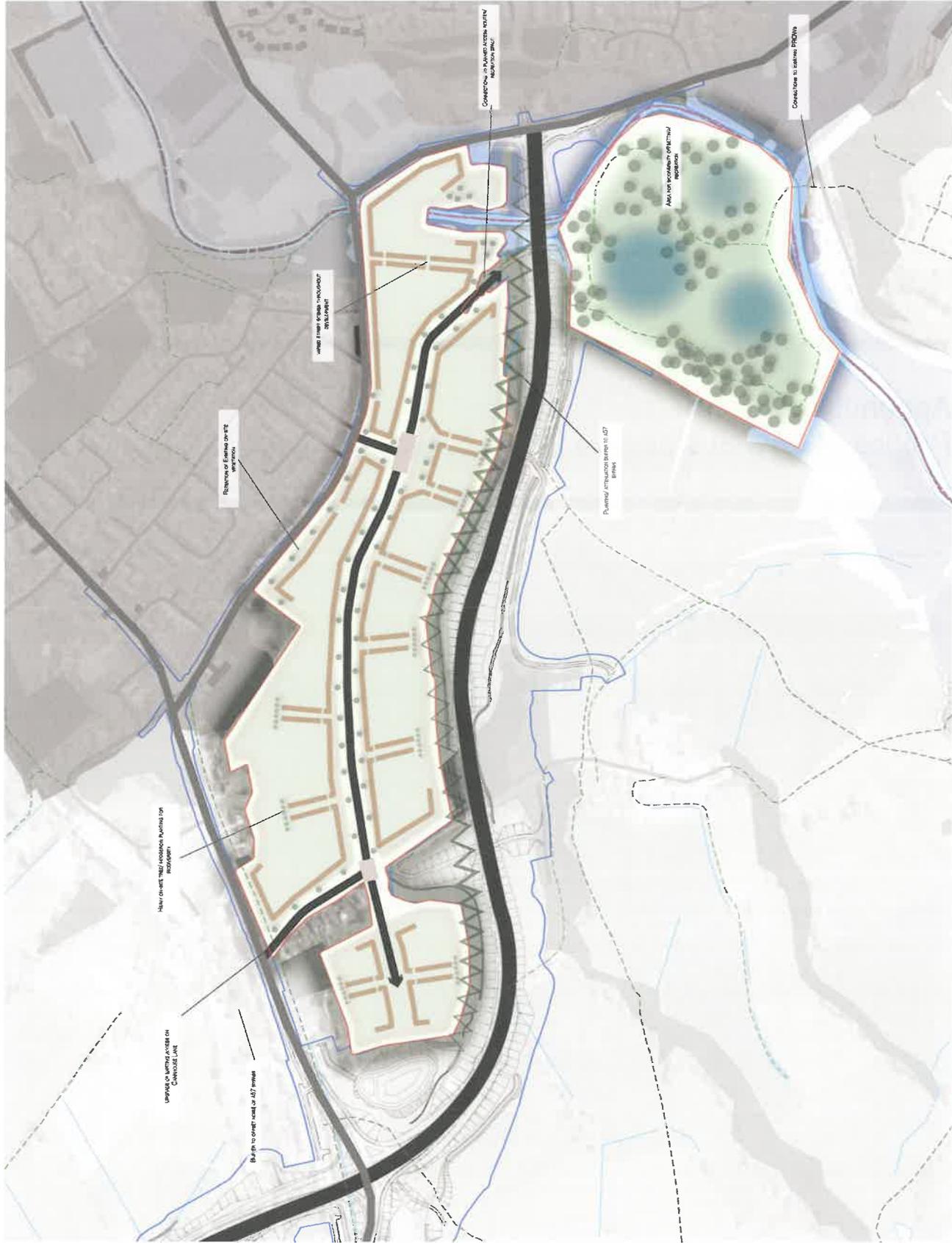
Appendix 1:
Proposed New Sustainable Urban Extension Concept Sketch

KEY

- Site Boundary for 17.02.01/02/03
- Net Development Area for 17.02.01/02/03
- 0.5% (20%) Public Open Space: Potential area of open space to be provided within the site for community use
- Proposed Use of B&V form
- Indicative 5th Access Points
- Key Internal Roads
- Settlement Boundary
- Public Right of Way
- On-site tree planting
- Buffer to A57 planned layout

Project	Mottram Moor
Client	Landowner/Consultant
Drawing No.	17.02.01
Date	17.02.01
Scale	1:1000
Author	For consultation purposes only
Client	17.02.01/02/03
Drawn by	17.02.01/02/03
Checked by	17.02.01/02/03
Project	Mottram Moor
Client	Landowner/Consultant
Drawing No.	17.02.01
Date	17.02.01
Scale	1:1000
Author	For consultation purposes only
Client	17.02.01/02/03
Drawn by	17.02.01/02/03
Checked by	17.02.01/02/03

This is a conceptual plan for the site. It is not a final plan and should not be used for construction purposes. It is intended to provide a general overview of the proposed development and to illustrate the layout of the site. The plan is subject to change and should be used in conjunction with the accompanying text and drawings.



Land at Mottram Moor, Tameside Concept Layout



A57 Link Road Written Representation Summary

These written representations have been prepared by Savills (UK) Ltd on behalf of Crossways Commercial Estates Ltd who are the freehold landowners of part of the wider site which is affected by the proposed A57 Link Road – Land Registry Title reference GM917343.

It must be noted that the proposed A57 Link Road will facilitate the provision of a strategic 'infill' residential development opportunity to come forward, in the form of a new sustainable urban extension (SUE) adjacent to the north. In doing so, the proposed A57 Link Road will provide a strong defensible boundary which will limit the encroachment of the countryside in this location. The provision of a new SUE in this location will help to meet the acute housing needs of the local area and Greater Manchester as a whole. These written representations should therefore be read in this context. The proposed SUE would represent a deliverable, developable Sustainable Urban Extension with the capacity to deliver circa 600 - 700 houses based on a gross site area of c. 27 Ha (c.70 acres).

Throughout the various consultation stages in respect of the A57 Link Road, Savills, on behalf of our client Crossways Commercial Estates Limited, have continued to support to the proposed A57 Link Road project in principle however, in the interests of avoiding the sterilisation of some of the land to the north of the proposed A57 Link Road, which is otherwise considered to have development potential moving forward, Savills have outlined a strong preference for the proposed 2018 road alignment over the more recent proposed 2020 road alignment. Our comments specifically request the need for the applicant to:

1. Relocate the proposed signalised junction southwards at its Woolley Bridge tie in as per the proposed 2018 designs; and
2. Relocate the proposed River Etherow crossing further southwards as per the proposed 2018 design.

The above amendments would help to maximise the net developable area of the proposed SUE and the associated benefits that this new road infrastructure would bring. The above amendments would also reduce the compensation payments required as a result of the proposed A57 Link Road.

Submission number: 4

Date submission received by PINS: 5 October 2022

Name: CPRE PDSY



The countryside charity
Peak District and
South Yorkshire

Rt Hon Simon Clarke, MP
Secretary of State for Levelling Up, Housing and Communities

By email: [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
3rd October 2022

Dear Secretary of State

Nationally Significant Infrastructure Project (NSIP) process - National Highways non-compliance with its licence

CPRE PDSY is a branch of CPRE, the countryside charity. We campaign for a thriving, beautiful countryside; rich in nature and playing a crucial role in response to the climate emergency; and valued, enjoyed, understood by, and accessible to, all.

We write to bring to your attention National Highways non-compliance with its licence conditions with respect to development of an NSIP, the A57 Link Roads. Initially we sent our concerns to the Office of Road and Rail (ORR) as the Highways Monitor. ORR advised that the NSIP process is a policy matter for your department and the DfT, and advised us to address our concerns to yourself. This NSIP is a major road scheme on the east of Manchester with which we have been engaged through the scheme's original options' appraisal, two statutory consultations, and the Examination into its draft Development Consent Order (DCO). The Secretary of State for Transport's decision on the scheme is awaited on 16th November 2022.

In the report accompanying this letter we present substantial evidence of National Highways poor behaviour with respect to the NSIP/DCO process (paragraphs 5-50 and 63-73). Also of importance with respect to the process, there is evidence of failure to properly steward the future of this part of the Strategic Route Network - National Highways has adopted a piecemeal, rather than a strategic, approach to planning for the route; of failure to conform to the principles of sustainable development; and of failure to comply with Government policy. National Highways' approach prejudiced engagement with stakeholders and the public, and calls into question not only the integrity of the company but also the veracity of the evidence for the DCO.

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future

[REDACTED]
Registered Charity No.1094975 Registered Company No. 4496754



The countryside charity
Peak District and
South Yorkshire

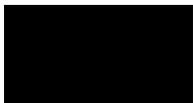
The NSIP/DCO process for the A57 Link Roads was unsatisfactory for all interested parties. Through both statutory consultations substantial objections were made on the grounds of scant information. Local communities and the public found it difficult to engage with the formal and intimidating DCO examination. National Highways was reluctant to be scrutinised which further frustrated responses by key stakeholders and other interested parties. Scrutiny through the Examination process revealed fundamental omissions and flaws which could lead to delays in determination of the scheme.

The non-compliance described demonstrates that the process through which the A57 Link Roads has passed has been both unlawful and encumbered by participatory unfairness making untenable any decision which might be made to proceed with the scheme. This conclusion is also shared by our consultant, Keith Buchan of MTRU, a Chartered Transport Planning professional who engaged in the DCO process and whose views, submitted to the Examining Authority in May 2022, can be read here:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010034/TR010034-001534-Keith%20Buchan%20-%20comments%20on%20submissions%20for%20Deadline%2011.pdf>

We are aware of the National Planning reform programme which was consulted on in 2021. However, this predated our engagement with the Examination which took place between November 2021 and May 2022. We hope you will consider our comments for that reform. In our experience, it was not the NSIP process that was at fault but the manner in which National Highways deployed it. The development of an NSIP should be front loaded with a WebTAG compliant transport appraisal and full environmental impact assessment, both available for public scrutiny before the formal DCO process is entered. We look forward to hearing from you as to how your Department intends to address our concerns. We have also sent the report, as suggested by the ORR, to the Secretary of State for Transport.

Yours sincerely,



Anne Robinson
Campaigner

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future



Registered Charity No.1094975 Registered Company No. 4496754

NATIONAL HIGHWAYS NON-COMPLIANCE WITH ITS LICENCE CONDITIONS

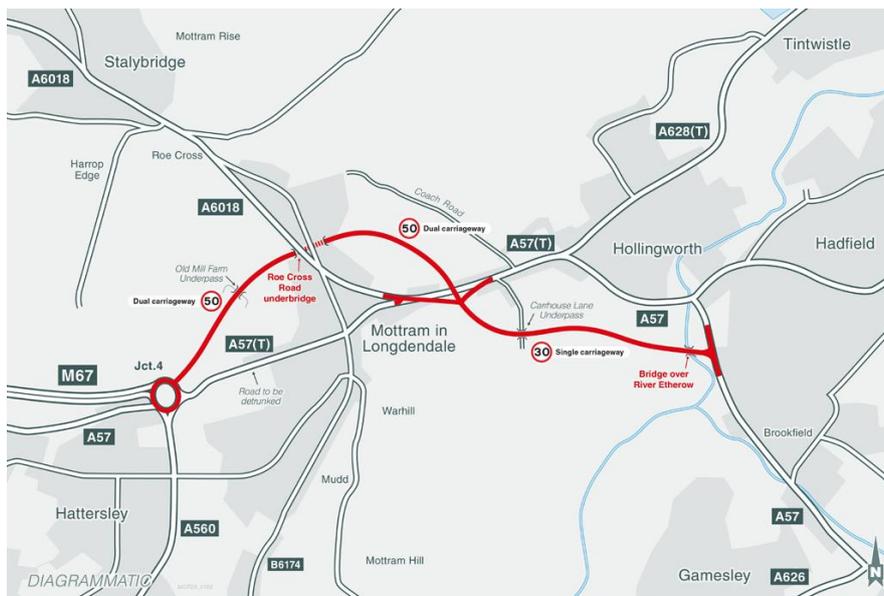
- 1 CPRE PDSY is a branch of CPRE, the countryside charity. We are also as the Friends of the Peak District, the National Park society for the Peak District National Park and a member of the Campaign for National Parks. We believe in a thriving, beautiful countryside, rich in nature and playing a crucial role in the response to the climate emergency. Our goal is a countryside that's valued, enjoyed and understood by, and accessible to, everyone, wherever they live. Through all our work we look at the role of our countryside in tackling the climate emergency, including seeking ways to increase resilience and reduce impact.
- 2 Through our engagement with Highways England/National Highways' (NH) plans for major road building impacting on the Peak District we have found that the company has not complied with several of its licence conditions, some of which are statutory directions. This relates particularly to the development and progression of its proposed A57 Link Roads¹. The non-compliance described below represents not only a serious malfeasance but also demonstrates that the process through which the A57 Link Roads has passed has been both unlawful and encumbered by participatory unfairness making any decision which might be made to proceed with the scheme untenable. As the Highways Monitor, we understand that the Office of Rail and Road (ORR) monitors National Highways' compliance with the statutory directions and regard to the guidance issued by the Secretary of State for Transport (SoS) in its licence. We are therefore bringing this non-compliance to your attention.
- 3 **With respect to the A57 Link Roads we urge the ORR to assess NH's performance in the light of this representation to you and report your findings to the SoS before they make a decision on the scheme in mid-November 2022. More generally we urge the ORR to enforce behaviour that is expected of a public body. In particular, we suggest that the ORR a) insists on, or provides, much more robust assessment and monitoring of scheme development from options appraisal through project business case, and b) reviews or instigates a review of the NSIP proposal and DCO process, for example in line with paragraph 29 below.**
- 4 The document is laid out as follows
 - (A) Background
 - (B) Behaviour unacceptable in a public body, Licence para 5.19, as demonstrated by
 - (1) Statutory consultations
 - (2) Transport Assessment Report
 - (3) NH's response to CPRE PDSY's requests for information

¹ The scheme appears in ORR's Annual Assessment of NH's Performance 2021-2022, Tables B4 and B11 <https://www.orr.gov.uk/sites/default/files/2022-07/annual-assessment-of-national-highways-performance-2022-print.pdf>

- (4) Examination of Development Consent Order (DCO) application
- (C) Failure to comply with statutory directions in the Licence, paras 4.1 management of Strategic Road Network (SRN), 4.2 general duties on Licence holder and 5.29 Government policy
- (D) Failure to have regard to guidance in the Licence, paras 5.15 and 5.23
- (E) Conclusions.

BACKGROUND

- 5 The A57 Link Roads (the scheme) developed as NH's favoured option out of the 2015 Trans-Pennine Routes Feasibility Study². It is a dual carriageway bypass of Mottram between the M67 and the A57T, continuing as single carriageway extension A57T to A57 to Glossop, which would effectively bypass part of the A57 called Woolley Lane (see figure below). National Highways (or Highways England as it was) held statutory consultations on the scheme in 2018³ and 2020⁴. (The scheme was called the Trans-Pennine Upgrade until 2020 when it became the A57 Link Roads.)



- 6 As a Nationally Significant Infrastructure Project (NSIP) the scheme's draft DCO was submitted to the Planning Inspectorate (PINS) on 28th June 2021, when all the application documents became publicly available, and was accepted for examination on 26th July 2021. The examination of the DCO application was conducted between 16th November 2021 and 16th May 2022. The Examining Authority (ExA)'s recommendations must be made by 16th August 2022 and the SoS's decision must be made by 16th November 2022.

² <https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports>

- 7 CPRE employed a professional transport planner, Keith Buchan of MTRU (Metropolitan Transport Research Unit), to develop our alternative proposals to the scheme for consideration through the 2015 Trans-Pennine Routes Feasibility Study and to give evidence to the Examination-in-Public (EiP)⁵. MTRU's engagement in the EiP led to consistent and expert challenge by a professional transport planner with extensive experience.
- 8 As a branch of CPRE we have had a 50 year history of engagement with the scheme in all its iterations. The evidence we present here is focused on our engagement with development of the scheme over the last 8 years; a comprehensive assessment of both the 2018⁶ and 2020⁷ statutory consultations which was submitted to the PINS as evidence of the inadequacy of the consultations; and full engagement as an Interested Party (IP) at the EiP into the scheme. We objected to the scheme on the basis that sustainable alternatives exist that should be trialled before unsustainable road building is pursued. We are not here concerned about the scheme and its impacts except in so far as they demonstrate non-compliance by NH.
- 9 All the DCO documents for the scheme appear on the PINS website⁸. References beginning REP, EV, APP, AoC or AS refer to documents in the EiP library. The library lists all documents accepted into the EiP and provides links to each one. See footnote for link to the Library⁹.

Framework for assessment of NH's performance

- 10 The expectations of NH run higher than the conditions of its licence. They are spelt out in the Foreword to the licence by the Minister for Transport at the time: *'Government remains responsible for strategic roads and Ministers will continue to be accountable for making sure that the network is managed responsibly, in a way that safeguards value for public investment, meeting the needs of road users, securing individual well-being and*

⁵ Our alternative package comprised exclusion of through-traffic of HGVs through the Peak District National Park, including on the A57/A628/A616T with sustainable transport measures.

⁶ <https://infrastructure.planninginspectorate.gov.uk/projects/north-west/a57-link-roads-previously-known-as-trans-pennine-upgrade-programme/?ipcsection=advice&ipcadvise=73c2ad0ecc>

⁷ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-Advice-00007-1-A57-Link-Roads-Email_Redacted.pdf On 24th May 2021 we submitted additional information to PINS about the inadequacy of the consultation which appears to have been removed from the PINS website but a summary can be found in REP2-069 Appendix B.

⁸ <https://infrastructure.planninginspectorate.gov.uk/projects/north-west/a57-link-roads-previously-known-as-trans-pennine-upgrade-programme/?ipcsection=docs>

⁹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-000603-A57%20Link%20Road%20Examination%20Library%20Published.pdf>

supporting economic purpose, both today and for future generations... This document represents a crucial part of that system, by setting out the Secretary of State's statutory directions and guidance to Highways England. It makes clear, to both Highways England and the wider community of road users and stakeholders, what we expect Highways England to achieve and how they must behave in discharging their duties and in delivering our vision and plans for the network, set out in the Road Investment Strategy.

- 11 *The Licence emphasises that the role of Highways England is about more than just complying with the letter of the law. We expect the company to go the extra mile in the way it engages with road users and collaborates with other organisations to develop shared solutions. And they must take a lead in promoting and improving the role and performance of roads in respect of broader communal responsibilities, such as the aesthetics of design, safety and the environment, as well as driving forward wider progress on technology and innovation.'*
- 12 In addition the baseline standard of the Seven Principles of Public Life (the Nolan Principles) applies to anyone who works as a public officeholder, including all people appointed to work in non-departmental public bodies, such as NH¹⁰. Five of the seven principles are key to our assessment. These are:
- Objectivity - Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
 - Accountability - Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
 - Openness - Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
 - Honesty - Holders of public office should be truthful.
 - Leadership - Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.
- 13 It is within this context that we have assessed NH's performance, under the headings (B) Behaviour Unacceptable in a Public Body, (C) Failure to Comply with Statutory Directions in the Licence, and (D) Failure to Have Due Regard to Guidance in the Licence.

¹⁰ <https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-of-public-life--2>

(B) BEHAVIOUR UNACCEPTABLE IN A PUBLIC BODY

- 14 We start with the licence condition that applies to NH's interface with the public. Although para 5.19 is not a statutory direction, it should be a golden thread through all NH's interactions with organisations and the public, and we quote it below for reference.

Licence Para 5.19 In complying with 5.17 and 5.18, the Licence holder should co-operate with other persons or organisations in a way which is demonstrably:

- (a) Open and transparent – involving relevant stakeholders, ensuring that essential information is available to affected and interested parties, and that the processes for engagement and communication are clear;**
- (b) Positive and responsive – seek to build trusting and effective working relationships with key partners and stakeholders, engaging with due efficiency and economy and in a timely manner;**
- (c) Collaborative – working with others to align national and local plans and investments, balance national and local needs and support better end-to-end journeys for road users.**

- 15 We show below, through (1) the statutory consultations; (2) the Transport Assessment Report; (3) NH's response to CPRE's requests; and (4) the EiP, how NH omitted critical evidence that was crucial to understanding the scheme's impacts, presented biased evidence, misrepresented evidence, refused to share information, was reluctant to give straight answers to questions and failed to follow best practice.

(1) The statutory consultations

- 16 Through both statutory consultations NH withheld and refused to share essential information. There was insufficient information to allow the public to make an informed assessment of the impacts of the scheme. Some of the statements were misleading and bordered on the dishonest. NH steered the consultations away from over-arching fundamental questions, such as the need for the scheme and possible alternatives, towards detailed matters of design.

2018 statutory consultation

- 17 No transport assessment or traffic modelling results and little information as to the impacts of the scheme on the environment or the community¹¹ were made available during this first statutory consultation. As a result High Peak Borough Council,

¹¹ We brought this to the attention of the Planning Inspectorate and relevant local authorities by letter dated 11th March 2018.

Derbyshire County Council and the Peak District National Park Authority all submitted holding objections.

- 18 In view of these omissions, we asked Highways England if it would make traffic data available for the next consultation. It promised to do so¹² but the promise was never honoured.

2020 statutory consultation

- 19 The second 2020 statutory consultation was held during a complete lockdown for the Covid pandemic. NH claimed to have mitigated the effect of the restrictions but comparison of the 2018 and 2020 consultations revealed the only ‘mitigation’ was the addition of 3 non-interactive webinars. These provided wholly inadequate replacements for face-to-face events. In addition, people were expected to view hard copies of the documents in three cramped local post offices (as local authority offices were closed) or to view the documents on line.
- 20 A DCO applicant has a duty to consult the community in accordance with the Statement of Community Consultation (SoCC)¹³. The SoCC stated *‘we’re publishing ... consultation material to assist well-informed responses to the consultation... The report will provide information about the potential environmental effects of the scheme.’* The consultation material comprised a colour brochure delivered to the majority of households in the area, a non-technical summary and three volumes of the Preliminary Environment Information Report (PEIR). The SoCC-promised delivery of a 37-page document of FAQ to the majority of households in the area did not occur. Air pollution, noise and carbon emissions were the only impacts assessed and then only partially. The omissions and misrepresentations from the consultation were extensive and are detailed in Appendix A. They included no transport assessment, traffic data or traffic modelling; no mention of the adverse impacts on Glossopdale, on the Peak District National or on the Green Belt; a misleading impression that road safety would improve; and a brochure which focused to the exclusion of all else on the immediate benefits to residents of Mottram and on Woolley Lane – a sales pitch for the scheme, not an honest presentation of its effects.
- 21 Just as with the preceding statutory consultation in 2018, in the 2020 statutory consultation neither the public nor the statutory consultees had the information available to them to make informed responses. Once again Derbyshire County Council,

¹² Email to CPRE PDSY 23rd March 2020 *‘Thank you for your email dated 19 February 2020 regarding the article about the Trans Pennine Upgrade in the Manchester Evening News.... I can confirm that we will honour our promise to present the plans and results of the air quality, noise and traffic figures to the public at engagement events scheduled for later this year, prior to a DCO application’.* Ryan Rawson, Regional Investment Programme (RIP) North Assistant Project Manager

¹³ Planning Act 2008 s 47

High Peak Borough Council and the Peak District National Park Authority all submitted holding objections based on lack of information in the PEIR and the absence of any traffic modelling or transport assessment.

- 22 The degree to which the impacts of the scheme were withheld from the public through the consultation only became apparent through the scrutiny allowed by the EiP. These impacts included (i) increased traffic impacts and congestion causing rat running on residential streets (counter-productive to the adoption of active travel measures), poorer urban environment and increased risk of road crashes, all within Glossopdale; (ii) increased risk of road crashes on both the SRN and the local road network, particularly the A57 Snake Pass; (iii) severe adverse impacts on the Green Belt; (iv) increased traffic on cross-National Park roads. None of these are mentioned in any of the consultation documents. The brochure delivered to everyone's home concealed information that would have a huge impact on people's well-being. The statements on road safety in the FAQ were in total contradiction to the results presented with the DCO application and bordered on the dishonest. The concealment alone is sufficient to make the consultation on the scheme invalid, and to call into question the validity of the claimed support for the scheme, not to mention NH's integrity.
- 23 The statutory consultations are the only means available to the public to gain an informed impression of the scheme and its impacts. PINS regards them as the best time to influence a project whatever one's opinion¹⁴. The next step, the DCO application, is daunting, technical, requires huge amounts of time to read thousands of pages of evidence, and total commitment to keep up with weekly deadlines, answering questions from the Examining Authority (ExA), rebutting evidence and scanning revised versions of NH's original documents. It therefore excludes the majority of the public who do not have the resources or perseverance to engage.
- 24 NH is required to produce a Consultation Report to show how it met its legal duties with respect to consultation and took account of the comments made. The Consultation Report is therefore an important document. Best practice¹⁵ advice is for those making a DCO application to make it available before the application is submitted to PINS. NH refused to do this when we asked¹⁶ and only submitted it with the DCO application. It therefore failed to follow best practice. Seeing the comments made and NH's response to them would have helped the public prepare for the DCO process.

¹⁴ <https://infrastructure.planninginspectorate.gov.uk/application-process/the-process/>

¹⁵ Planning Act 2008: Guidance on the Preapplication Planning Process, 2015, para 81
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418009/150326_Pre-Application_Guidance.pdf

¹⁶ Email from CPRE to NH 17 May 2021 asking if the consultation report will be available before the DCO application is made, as good practice advises. Email from NH to CPRE 25 May 2022 advising that full consultation report will be published when DCO application is submitted

- 25 Once the DCO application is submitted, all the local authorities are invited to submit adequacy of consultation reports to PINS. Although all responded that NH had held the consultation according to the SoCC, Derbyshire County and High Peak Borough Councils (AoC-003) and the Peak District National Park Authority (AoC-004) drew attention to multiple flaws in the consultation; and reported that insufficient information was published with the consultation to enable them and the local community to determine the likely impacts of the scheme. The Councils also reported that they had *'received multiple letters from residents which raised similar concerns'*.
- 26 In summary, both consultations were a travesty of what a consultation should be. Under its licence NH is bound to follow the Cabinet Office guidance on consultation. The current version of this, issued in 2018, encourages those preparing consultations to *'give enough information to ensure that those consulted understand the issues and can give informed responses'*. The Gunning Principles for consultation¹⁷ require *'There is sufficient information to give 'intelligent consideration' - The information contained in a consultation document should not be as inaccurate or incomplete as to mislead potential consultees in their responses.'* The Aarhus Convention guarantees the right of access to environmental information held by or for public authorities, subject to limited conditions.
- 27 We have shown above that the consultation did not follow best practice according to any of these principles or guidance. It was not conducted in an open and transparent way. The limited amount of information available was so selective it was biased to the point of being dishonest, and would likely be prejudicial to a party affected by the decision. No-one could have made an intelligent consideration of, or submitted an informed response about, the scheme's impacts.
- 28 It appears contrary to good practice to have received holding objections from the statutory consultees in response to the 2018 consultation, and not addressed those concerns before holding another statutory consultation. An effective approach would have been to address all the statutory consultees' concerns and to then seek public views before proceeding to a DCO application. Development of a NSIP should be front loaded with a WebTAG compliant transport appraisal and full environmental impact assessment available for public scrutiny before the formal DCO process is entered. This was not done.

¹⁷ <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>
Supreme Court in *R (Moseley) v Haringey London Borough Council* [2014] 1 WLR 3947

(2) Transport Assessment Report (APP-059)

- 29 The failure to supply full information about the transport impacts, the traffic modelling and traffic data continued into the DCO application. A full WebTAG compliant appraisal, essential to understanding the impacts of the scheme, was not presented as part of the DCO application, as required by National Policy Statement National Networks 2014 (NPSNN) 5.207. The Transport Assessment Report (TAR) accompanying the DCO application did not allow full comprehension of the traffic effects of the scheme or provide sufficient evidence to test the impacts of the scheme against legal, policy and guidance requirements.
- 30 The withdrawn but de facto guidance states that *'a TA is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel¹⁸'*. Current Government Guidance¹⁹ for planning states *'Transport Assessments are thorough assessments of the transport implications of development'*, and *'care should be taken to establish the full range of studies that will be required of development at the earliest opportunity as it is unlikely that a Transport Assessment or Statement in itself could fulfil the specific role required of a transport element of an Environmental Impact Assessment where this is required'* as in this scheme (our emphasis).
- 31 Despite all this guidance NH reduced the main purpose of the TAR as *'to summarise the development of the Scheme in a single, stand-alone report for general consumption.²⁰'* The omissions and flaws detailed in Appendix B show how far the TAR fell short of presenting a report for general consumption, never mind a 'thorough', 'comprehensive and systematic' assessment of the transport implications of the scheme. No details were given of the traffic modelling and the results showed numerous inconsistencies, still unexplained at the end of the EiP. In three and a half pages it named the modelling software and used three figures to show the modelled area and local zone disaggregation. There was no local model validation report, no forecasting report, no options report, no strategic case report, no economic case report, no appraisal summary. The impact of increased traffic within Glossopdale was barely addressed - the increased risk of road crashes on residential roads, severance of pedestrians, the impact of HGVs, longer travel times were not mentioned or addressed. Journey time savings were limited to parts of journeys, not actual journeys the travelling public would make. There was no assessment of the impact on buses.

¹⁸ Guidance on Transport Assessment, DfT & DCLG, 2007, para 1.2

¹⁹ <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>

²⁰ TAR 1.6.3

- 32 We challenged NH on the quality of the TAR when the DCO documents were submitted but did not receive a reply until well into the EiP. It was defensive and dismissive²¹: *'It is not normal practice to submit all the detailed information relating to the traffic and economic analysis and modelling of a scheme due to the complexity and sheer volume of the data that underpins it, which cannot generally be understood and interpreted by interested parties, unless they are specialists in the fields of traffic modelling and economic analysis²².'*
- 33 Notwithstanding that NH knew there would be, and was, at least one transport professional (MTRU) engaged in the EiP, this was obstructive and counter to understanding the scheme's impacts. Others also challenged the quality of the TAR to which NH responded²³: *'The Transport Assessment Report (TAR) (APP-185) was prepared in accordance with industry standard best practice which is based on previous Department of Transport (DfT) guidance on the preparation of transport assessment that was withdrawn several years ago and not subsequently replaced by alternative guidance. Therefore, currently there is no guidance regarding the preparation of transport assessments for transport schemes'*. Due to the poor assessment we and other IPs appealed to the ExA [REP10-017] that NH should produce a Web-TAG compliant transport appraisal that addressed our concerns. The ExA did not respond to our request. NH did respond [AS-011] as a late submission to the penultimate deadline, reasserting arguments previously made.
- 34 In summary, the TAR contained highly selective information designed to promote the scheme and conceal the serious adverse impacts it would impose. NH failed to meet the minimum standard set by Government for TARs as a 'comprehensive and systematic' assessment of the transport implications of development, let alone go the extra mile required by its licence. NH has no excuse for producing such a poor assessment.
- 35 The lack of transparency regarding the information and data about the traffic modelling is most serious. It limits the public's involvement in the EIA process, which is important, not just to ensure compliance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regs'), which seek to ensure a process by which the public is given an opportunity to express their opinion on environmental matters, but also with the Aarhus Convention in respect of public participation. The public can only participate and give a reasonable opinion on environmental matters if sufficient background data on projected environmental effects is provided. It also undermines the process through which the SoS will seek to ensure that he is satisfied that the material

²¹ REP7-025, 9.69.5

²² REP5-021 page 13

²³ REP7-026, 9.70.33

provided by NH is sufficient for him to reach a reasoned conclusion on the significant effects of the proposed development on the environment.

(3) NH response to CPRE PDSY's requests for information

36 On our behalf Keith Buchan of MTRU began asking for background data on the transport appraisal and traffic modelling in March 2021 in order to inform the development of our alternative proposal and to understand scheme effects. His requests received no response. NH claimed not to have received the emails, although MTRU had never experienced such difficulties with NH before. Although we were told that the failure to receive MTRU emails was being investigated, a year later we have not received any details and on occasion NH did receive emails directly from MTRU. From May 2021 CPRE forwarded all emails from MTRU to NH. We have dealt with our experience during the pre-EiP period, through four key documents supplied to us and during the EiP.

i. Pre-examination

37 Listed below are our repeated requests by email for information relating to the full transport appraisal²⁴, only one of which was successful (in bold).

- 8th June 2021 we resubmitted our list of requested documents²⁵, all of which would have been available had a full WebTAG compliant appraisal been undertaken.
- 22nd Jul 2021 we asked if the sifting of options exercise²⁶ had been repeated since the 2015 Transpennine Routes Feasibility Study and for a response to 8th June email.
- **24th Aug 2021 NH confirmed 'that we have not repeated the Early Appraisal Sifting Tool (EAST) since finalising the options in 2015'.**
- 30th July having read the DCO documents we submitted questions and request for information (summarised in footnote below to show they were straightforward²⁷).

²⁴ REP12-034 which is a compilation of the emails between us and NH.

²⁵ Local Model Validation Report; TUBA outputs for vehicle kilometres and carbon (if not in above); Options Report; Strategic Case; Economic Case; Forecasting report, including use of DfT scenario approach; Assessment Summary Table.

²⁶ A57 Link Roads 6.3 Environmental Statement (ES) Chapters 1-4 Introductory Chapters Planning Inspectorate scheme reference: TR010034 Application document reference: TR010034/APP/6.3 para 3.3 Page 97 of 134

²⁷ Local model and forecasting report or data missing, other than the Transport Assessment (TA) and Appendix 2.1; WebTAG compliant appraisal not submitted but implied in TA, please submit it. Flow diagram in the TA and Appendix 2 are not clear as to their exact position on the roads to which they refer. Is there a labelling issue with Market Street in Hollingworth? Questions:

- 1 What models were used in addition to SATURN for the junctions?
- 2 What are the costs for signalling Junction 4 and what were the traffic impacts of doing this without the full scheme?
- 3 Which DIADEM elements were switched on and off?
- 4 How was walking and cycling included?
- 5 How was public transport included?
- 6 What are the forecasts or assumptions for the local modelled area for:
Public transport (today – 2025 – 2040)

- 6th August NH indicated it was dealing with our 30th July request under the terms of the Environmental Information Regulations 2004 with a due date for issuing a response of 20th August.
- 24th August NH, responding to our email 6th Aug, referred us to the transport modelling and forecasting reports submitted with the DCO. As we have shown above in para 32 there were no transport modelling and forecasting reports submitted with the DCO.
- 2nd Sept we repeated our request for information.
- 15th September 2021, MTRU made a formal complaint *'about the failure to supply basic information on a major scheme DCO: the A57 Link Roads. This has two aspects: the failure to supply the information and the way in which specific requests have not been answered or answered in an unsatisfactory manner. This has severely restricted the ability to scrutinise the justification for the scheme... Please engage with me so that my information requests can be met and my requests for clarification answered.'* To date, MTRU's formal complaint has still not been addressed.

38 NH's target to respond to emails is within a maximum of 10 working days. The only email which received a response within 10 working days was the email in which NH invoked the Environmental Information Regulations 2004 – NH failed to meet this deadline too. The blatant delay in responding was uncooperative and negative. Directing us to where information could be found, knowing full well that it was absent, breaks multiple Nolan principles. NH's approach to dealing with our requests for the full transport appraisal was in contrast to general enquiries which were dealt with in a timely fashion, including those relating to the scheme's environmental statement and road collisions which were addressed under Freedom of Information. This gave us the impression that NH had something to hide from scrutiny in the background transport work to the scheme.

39 For eight months NH were uncooperative, unhelpful and withheld information about the full transport appraisal that should have been supplied with the DCO application. Finally in the evening of Friday 12th November - one working day before formal proceedings for the EiP commenced on Tuesday 16th November - four background documents were sent to us; the Combined Modelling and Transport Appraisal Report, the Economic Appraisal Package, the Transport Forecasting Package and the Transport Modelling Package for the A57 Link Roads.

Cycling (today – 2025 – 2040)

Walking (today – 2025 – 2040)

7 Are the time savings in Figure 7.7 to the junctions at each end but not through it? Are there more details of real origin and destination pairs and zone to zone timings?

8 Do you have queue length data for key junctions?

ii) The four background documents – REP2-090

- 40 When NH shared the four technical documents they told us they would not be submitting them to the EiP *‘due to the technical depth of these documents. The Transport Assessment produces the data in layman’s terms and should be used instead²⁸’*. In the interests of openness and transparency we submitted them to the EiP at with our written representation on January 14th 2022, Deadline 2. They were accepted by the ExA and published by PINS as one combined document - REP2-090 (in which two of the documents are repeated). A number of IPs, including CPRE, referred to REP2-090 in their submissions. At first NH ignored references made to it. However, on 23rd February 2022 in response to IP submission REP3-032 drawing attention to REP2-090, NH stated²⁹:
- 41 *‘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’*.
- 42 This statement was not only misleading, it was also incorrect [REP6-032]. The full package of information accompanying the DCO application was accepted by the Planning Inspectorate on 26 July 2021. The four documents were released by NH to CPRE on 12th November 2021, nearly 4 months after the DCO application was accepted, not in advance of its submission.
- 43 Furthermore these documents are 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. The fact that the four documents were accepted by the ExA indicates they must have been considered of use to the EiP; the ExA and IPs were able to read them in the context of all the supporting information for the scheme. We found them crucial for scrutinising evidence. They emphasised the poverty of information in the TAR and how much essential evidence NH had withheld. For example:
- 44 The Transport Forecasting Package revealed that refinements were made to the model during development of the scheme in order to reduce air pollution in Tintwistle and Dinting Vale Air Quality Management Areas (AQMAs), and along Glossop High Street West³⁰. The pollution arising from the scheme would otherwise have been of such

²⁸ Draft Note of meeting between NH and CPRE, para 6, 15 December 2021

²⁹ REP5-021 page 13

³⁰ REP2-090 7.3.1 pdf page 519/790

severity that it was considered that it would jeopardise the application for development consent. These model refinement steps could have led to the anomalies in the traffic outputs described above. They could also have led to differences between 2025 'do minimum' and 'do something' modelled traffic flows through both AQMAs and along the A57 not meeting the criteria for, and therefore being excluded from, assessment of air quality³¹. They could also have led to changes in traffic flows on the A628T with the scheme not meeting the criteria for assessment under the Habitats Regulations Assessment.

- 45 The Transport Forecasting Package also revealed that the traffic model had been applied to reduce traffic flows on the A57 through Glossop and divert them onto residential roads, leading to all the consequences described in para 32 above. It revealed a diversionary route labelled 'Hadfield Alternative'. This information was not available in any of the DCO documents and was a key point of concern to IPs³².

iii) During the EiP

- 46 Once the EiP started and the ExA was taking note of proceedings NH became more responsive. We had two technical meetings with NH during the EiP on 15th December 2021 and 19th January 2022 in order to allow MTRU to ask questions, request information and increase our understanding of the transport assessment. The meetings were led by NH; direct technical dialogue with those undertaking the assessment of the scheme was not allowed. This fundamentally limited our understanding. The bulk of the requested information was supplied by 7th March [REP7-025, 9.69.61]. However the data requested on public transport was never satisfactorily resolved (see Appendix C a. below).
- 47 We initially agreed to aid the EiP and the ExA as to where we did and did not agree with NH through a Statement of Common Ground (SoCG). Due to NH's obfuscation and ignoring our requests for clarification we were unable to complete this.
- 48 In summary, NH was completely resistant to engaging with us and providing information before the EiP started. There was no good reason for withholding any of it, and it could all have been shared at the latest with the DCO application. Once the EiP started, the formal process required at least a show of cooperation but even that was hampered by NH's restrictive management of the dialogue.

³¹ Through the Tintwistle AQMA the predicted vehicle flows were 40 vehicles per day short of the threshold (an increase of 1,000 AADT) required by the guidelines. The shortfall to meet the criteria for the Habitats Regulation Assessment was 150 vehicles per day. The PDNPA in its Local Impact Report REP2-048, 8.3.12 through to its deadline 9 response REP9-035 pp 3-4 submitted a sustained judgement that the European sites adjacent to the A628T must be assessed but was ignored.

³² REP2-089; REP4-027 pp4-5; REP9-051 pp1-3; REP9-049

(4) Examination of the DCO application

49 The topics through which NH tried to conceal crucial evidence are detailed in Appendix C. They ranged from assessment of public transport; assessment and review of appraisal options; explanations of the spurious traffic data, the uncertainty log and associated development; increase in vehicle kms; a sensitivity test for carbon emissions; visibility of the scheme to the public; major nearby development Godley Green Garden Village; and the impacts of national and regional policy on public transport walking and cycling policy on the scheme. The tactics demonstrate a spectrum of behaviour from delay in producing information to the extent it was too late for the EiP to consider, trying to show due process had been followed when it had not, avoidance of answering questions and drip feeding small amounts of information, playing circular games, offering diametrically opposing answers to the same repeated question, and poor understanding of its own evidence. All this wasted EiP time and opportunities for proper scrutiny, gave rise to a lack of confidence in the work undertaken by NH and its contractors, and challenged the integrity of the environmental, social and economic assessment of the impacts of the scheme.

Summary of non-compliance with Licence para 5.19

50 Both statutory consultations misled the public as they were prejudicially biased, withheld information critical to understanding the impacts of the scheme and failed to meet basic standards of consultation. NH, when dealing with our requests for information, failed to engage in an open, transparent, responsive and collaborative way. Instead it was obstructive, only improving its behaviour once under observation from the ExA. The TAR presented with the DCO application was an exceedingly superficial assessment of the scheme from which crucial evidence was withheld. NH's approach throughout the EiP was to reduce adverse impacts to insignificance and to dismiss challenges, rather than engage in constructive dialogue. It was evasive, obstructive and defensive, and frustrated the many attempts to get substantive answers that would aid understanding of the scheme's impacts.

(C) FAILURE TO COMPLY WITH STATUTORY DIRECTIONS IN THE LICENCE

Licence Para 4.1 It must operate and manage the SRN in the public interest in respect of both current activities and needs and in providing effective stewardship of its long-term operation and integrity.

51 The process of addressing the problems along the A57/A628/A616T corridor was deeply flawed. The A57T is but one section of the strategic South Pennines Corridor between the Port of Liverpool and the Humber Ports³³. Instead of addressing the whole route the 2015 Trans-Pennine Routes Feasibility Study focused on the traffic 'hot spot' at Mottram. It excluded another strategic corridor, the M62, the traffic on which interacts

³³ South Pennines Route Strategy 2017 Highways England

with the A628T corridor. The study focused on highway matters, avoided a multimodal approach, and failed to adopt a full corridor approach. It did not therefore follow the WebTAG requirements to start with a blank sheet, consider transport problems in the round and consider all solutions including non-transport ones³⁴. This narrow approach is reflected in the South Pennines Route Strategy in which all the issues on the SRN are solved with highway interventions without due regard to modal shift to rail. The Mayor of Liverpool has expressed his dissatisfaction with this approach in his recent rejection of the A5036 Port of Liverpool dualling at the west end of the corridor³⁵.

- 52 The scheme under examination is what remains of previous, larger scale proposals (the 2007 Mottram-Hollingworth-Tintwistle bypass). The issue of piecemeal implementation disguising real strategic impacts was dealt with as far back as the 1980s and by SACTRA. Yet even now this piecemeal approach continues to east and west of the scheme within this corridor. To the east NH is exploring the feasibility of the Hollingworth-Tintwistle bypass³⁶. It is likely that the current scheme will increase traffic along the A628T through Hollingworth and Tintwistle, fuelling irresistible demands for road building to relieve the villages. The next step would then be the proposed dualling of the corridor to the M1³⁷. Any extension to the east would impact directly on the Peak District National Park and bring the test of major development in a National Park into play. By developing a small length of the corridor the big strategic impacts are avoided and resistance is reduced as each piece passes through its formal process as a standalone scheme.
- 53 In the other direction, five miles to the west along the M67, the M67/M60 J24 Denton Island interchange was excluded from the scheme's assessment. Yet the interchange has long been recognised as a pinch point for congestion³⁸ in need of improvement, and the proposed interventions are part of the Trans-Pennine Upgrade of which this scheme is a part. *'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... It is included in*

³⁴ Transport Analysis Guidance The Transport Appraisal Process, DfT, 2014
<https://webarchive.nationalarchives.gov.uk/ukgwa/20181209040649/https://www.gov.uk/government/publications/webtag-transport-appraisal-process> The more recent version published in May 2018 carries the same information
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938766/tag-transport-appraisal-process.pdf

³⁵ Liverpool City Region Mayor, letter to SoSfT re A5036

³⁶ 2020 statutory consultation FAQ; RIS2 2020-2025

³⁷ Trans-Pennine tunnel study

³⁸ South Pennines Route Strategy 2017 Highways England; South Pennines Route-Based Evidence Strategy Report, Highways England, 2014, Figure 3; South Pennines Route Strategy, Highways England, 2017 p.29

the Highways England Risk Register for the project³⁹. The A57 Link Roads would add, according to NH modelling, an extra 8,000 vehicles every weekday to the M67 in 2025 the opening year⁴⁰. Adding in traffic from the proposed nearby major development Godley Green Garden Village (see Appendix C ix) would lead to the interchange operating at above or approaching capacity⁴¹. National Highways' plans for mitigation measures at the M60 J24 interchange were not mentioned in the DCO application.

- 54 All these failings stem from a failure of those undertaking an appraisal to understand and/or have due regard for the strategic context within which a proposal sits, as identified by the Treasury's Green Book 2020 (see para 92 below). Effective stewardship of the SRN's long term operation and integrity also requires a strategic multimodal approach, which NH has failed to take.
- 55 Increasing carbon emissions in a climate crisis is not effective stewardship in the public interest. In June 2021 the Climate Change Committee stated: *'Decisions on investment in roads should be contingent on analysis justifying how they contribute to the UK's pathway to Net Zero. This analysis should demonstrate that the proposals would not lead to increases in overall emissions⁴².'* In June 2022 it identified that *'Substantial investment in roadbuilding should only proceed if it can be justified how it fits within a broader suite of policies that are compatible with the UK's Net Zero trajectory⁴³.'* The case for the A57 Link Roads was developed many years in advance of DfT's Decarbonising Transport (2021) and the UK's Net Zero Strategy (2021), and did not foresee these key policy documents of the current legal framework, let alone attempt to align with them. The traffic modelling failed to express either document's policy objectives or targets as core assumptions - the current traffic models are based on assumptions which reflect very different scheme specific objectives that date from many years ago.

Licence Para 4.2 Without prejudice to the general duties on the Licence holder under section 5 of the Infrastructure Act 2015, the Licence holder must, in exercising its functions and complying with its legal duties and other obligations, act in a manner which it considers best calculated to:

Para 4.2d. It must ensure efficiency and value for money.

- 56 NH prematurely rejected alternatives (our package of lorry control system and sustainable travel measures; and the proposed Mottram Gyrotory Flow) that both

³⁹ REP12.028 Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 page B34 para 15.3.8; pdf page 110/170 - submitted by CPRE

⁴⁰ A57 Link Roads, ES, Appendix 2.1 Traffic Data, AAWT Opening Year 2025

⁴¹ Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 page B32 Table 9 pdf 108/170

⁴² Table A6 pdf page 20/32 Joint Recommendations Report to Parliament, Climate Change Committee June 2021

⁴³ Page 139, Progress Report to Parliament, Climate Change Committee, June 2022

scored as well or better than the scheme in the 2015 Trans-Pennine Routes Feasibility Study.

57 Our package was rejected as difficult to deliver – updated technology has simplified lorry control systems based on weight restrictions. The MGF, as proposed by an IP Mr Bagshaw, was initially described⁴⁴ as the *'best performing individual option against the sifting criteria and for meeting the objectives for the Scheme'* and as deliverable and feasible. Then, curiously, at this point in the assessment of options⁴⁵ it was decided to assess the MGF not as a standalone scheme, nor in conjunction with other sustainable measures, but in conjunction with a package of measures which included first and foremost a link road between the A57 (T) and the A57 in Glossop.

58 As NH failed to review the options during development of the outline business case for the scheme, the scheme is not proven to provide the most efficient and best value for money. The Economic Case for the scheme has not been made.

59 Compounding this error is the failure to include public transport, walking and cycling in the traffic modelling, which led to a BCR that does not reflect the current policy framework. The Government plans to cut urban traffic by increasing walking and cycling to 50% of all trips by 2030. Greater Manchester plans for no net increase in motor vehicle traffic and to reduce car's share of trips to no more than 50%, with the remaining 50% made by public transport, walking and cycling by 2040. Had the traffic modelling reflected these policy measures it would have shown a reduction in traffic forecasts for the scheme, and therefore a reduction in the value of journey time savings and the value for money. The failure to include public transport walking and cycling is part of NH's failure to engage with the strategic context of the proposal (see para 92).

Licence Para 4.2e. It must protect and improve the safety of the network.

60 The SRN and local road network would become more dangerous for drivers, not safer, with the scheme. The risk of road crashes would increase across the modelled network by 0.3%, the brunt of which would occur on the A628T and the A57 Snake Pass (county A road across the National Park). Despite the increased risk being a direct result of the scheme NH dismissed it as insignificant and offered no mitigation.

61 The increased crashes on the A628T would appear despite, and would negate the effect of, the A628T Safety and Technology improvements, previously part of the scheme but progressed separately as not requiring development consent. The improvements focus

⁴⁴ REP2-005 revised ES Ch 1-4 Introductory Chapters, page 100 Table 3.3 (23 Options assessed at the initial sift)

⁴⁵ Trans-Pennine Routes Feasibility Study, 2015, Appendix 2, the Stage 2 Report of this same study [Annexes – Annex 1], para 5.9

on crash hotspots and the provision of electronic signs⁴⁶ and were included within the baseline 'do minimum' scenario⁴⁷ for the scheme. The increased risk of crashes on the trunk route is due to traffic diverting off the safer motorway network and onto the A628T⁴⁸. In addition, *'the severity of the accidents which are predicted to occur on the new link road may increase due to the increased speed'* (TAR 7.2.12). NH's acceptance of increased crashes on the SRN does not meet the statement in Road Investment Strategy (RIS) 2020-2025: *'enhanced safety remains Highways England's first imperative and informs everything it does from design principles, road standards, operational procedures and investment decisions. We will strengthen this ambition through our investment plan, performance specification and targeted safety improvements through the small schemes fund'*.

- 62 The A57 Snake Pass *'is forecast to experience a modelled predicted increase of more than 160 accidents over the 60-year appraisal period⁴⁹'* with the scheme. NH took the attitude that *'safety features in areas outside the Scheme are not within the Applicant's remit⁵⁰'*. The route is already considered a high risk rural road. To mitigate the scheme's impacts Derbyshire County Council proposed the use of average speed cameras. However, such measures would cause harm to the National Park's statutory purposes and were challenged by the National Park Authority⁵¹. In the face of these difficulties NH proposed to 'update' the model with respect to the incidence of crashes on the Snake Pass at the detailed design stage when there would be no accountability through the EiP. *'It is possible that the appraisal overestimates the forecast increase in accidents on this section of road...'* *'...scheme modelling will be updated as the detailed design evolves⁵²'*. The start of the Snake Pass is 3.2miles east of the scheme. The detailed design of the scheme is not going to alter the incidence of crashes on the Snake Pass unless it includes a massive traffic restraint measure akin to the Mottram crossroads and/or average speed cameras along the Pass. This 'updating' appears most unusual as the modelling of accidents on the Snake was set up to ensure the most accurate relationship between accidents and flow [REP2-090, 4.7.32-4.7.33]. It appeared to us as subterfuge – an attempt to 'magic away' adverse impacts of the scheme and avoid mitigation which could prove difficult and costly to implement.

⁴⁶ The Case for the Scheme 2.1.9

⁴⁷ ES Ch1-4 Introduction 2.4.6-2.4.9; 3.4.5

⁴⁸ APP-185, 7.2.13

⁴⁹ Transport Appraisal 7.2.11-7.2.13

⁵⁰ Consultation Report Appendix Y page 167

⁵¹ REP12-014 SoCG between PDNPA and NH, 2.3.6

⁵² REP9-020 SoCG between Derbyshire County Council and NH, 9.5

Licence Para 4.2f. It must cooperate with other persons or organisations for the purposes of coordinating day-to-day operations and long-term planning;

- 63 This duty stems from section 5(1) of the Infrastructure Act 2015, to cooperate with other persons or organisations in order to:
- (a) Facilitate the movement of traffic and manage its impacts;
 - (b) Take account of local needs, priorities and plans in planning for the operation, maintenance and long-term development of the network (including in the preparation of route strategies);
 - (c) Provide reasonable support to local authorities in their planning and the management of their own networks.
- 64 We have not been privy to any of the meetings between the statutory stakeholders and NH. What follows has been collected from written statements made before and during the EiP. On the evidence before us NH has failed to meet this duty and licence condition.
- 65 As noted in para 22 above two local authorities and the Peak District National Park Authority put in holding objections on the basis of inadequate information. The latter changed this to an outright objection. This reflected not only the adverse impacts on the National Park, but also the lack of information available in the DCO documents.
- 66 HPBC requested an extension to the 2020 statutory consultation area so that all wards within Glossopdale would receive a coloured brochure about the scheme. This was denied.
- 67 NH refused to meet High Peak Borough Council's request to assess air quality through two AQMAs. It remains an area 'not agreed' through the SoCG⁵³ (see para 45 above).
- 68 NH dismissed the need for mitigation measures requested by High Peak Borough and Derbyshire County Councils for traffic impacts and increased risk of road crashes. NH considered all these impacts to be insignificant and not requiring mitigation. Towards the end of the EiP NH agreed to work on some measures, outside the DCO process, thus avoiding public scrutiny.
- 69 It refused to meet the Peak District National Park Authority's request to assess the impacts of the scheme on the European Natura 2000 sites adjacent to the trunk route⁵⁴, on the Tintwistle AQMA and on the Tintwistle Conservation Area.

⁵³ REP12-008 & REP12-025 SoCG between High Peak Borough Council appears in library twice, documents are the same, paras 9.5, 9.18 & 9.20; REP2-046, 19.1 HPBC Local Impact Report; REP9-033

⁵⁴ REP12-014, 2.1.1.2, 2.3.1

70 Although NH's safety responsibilities are limited to the SRN, it is expected to cooperate with government agencies, the devolved administrations, local government, enforcement authorities, a host of other public and private bodies, and road users to improve road safety⁵⁵. Every Local Highway Authority with responsibility for the roads that would see increased crashes with the scheme in place unanimously seek reduction of road crashes and casualties, all of which NH has ignored both in future day-to-day operations and long term planning:

- DCC LTP 3 2011-2026;
- South Yorkshire Mayoral Combined Authority⁵⁶, which aims to improve safety on the network for all users. *'Safety for all road users must remain of paramount importance'*;
- South Yorkshire Local Transport Plan aims to maximise safety⁵⁷;
- Sheffield City Council Transport Strategy (2018)⁵⁸;
- Kirklees MBC 2025 Transport Vision⁵⁹;
- GMCA's *'ambition'* is *'To reduce deaths on our roads as close as possible to zero (by 2040)*⁶⁰.

71 In the final version of the SoCG between Transport for Greater Manchester (TfGM) and NH, TfGM requested that NH provide a response to how the scheme would contribute to the Government's Transport Decarbonisation Plan and to Greater Manchester's local carbon targets and budgets⁶¹. *'The Climate Emergency declarations that are guiding local policy and therefore 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'*. NH refused this request despite the requirements of NPSNN para 4.4 and the EIA Regulations. However, it *'prepared a table to split the predicted GHG emissions for Greater Manchester and ... has issued this to TfGM.'*

⁵⁵ DfT's The Road Safety Statement 2019 A Lifetime of Road Safety

⁵⁶ Roads Implementation Plan 2020 SY MCA <https://governance.southyorkshire-ca.gov.uk/documents/s3997/Annexes%201%20The%20Roads%20Implementation%20Plan.pdf>

⁵⁷ SY LTP 2011-2026 7.1-7.15

⁵⁸ Transport Strategy 2019-2035 Sheffield CC <https://www.sheffield.gov.uk/home/travel-transport/transport-strategy-plans>

⁵⁹ <https://www.kirklees.gov.uk/beta/planning-policy/pdf/supportingDocuments/transportInfrastructure/2025-Kirklees-Transport-Vision.pdf>

⁶⁰ Transport For Greater Manchester, 2040, revised Jul 2021, <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/supporting-documents/?folder=\09%20Connected%20Places#fList>

⁶¹ REP12-009 TfGM Statement of Common Ground para 10.3, pp 28-29

72 TfGM also asked NH ‘*how the scheme contributes to Greater Manchester’s Right Mix targets and the Greater Manchester’s 2040 policies*’. This is Greater Manchester’s plans for no net increase in motor vehicle traffic and to reduce car’s share of trips to no more than 50%, with the remaining 50% made by public transport, walking and cycling by 2040. NH avoided the request and gave a tangential answer. In fact the traffic modelling in which TfGM had played no part had taken no notice of the Right Mix targets, and hence it could not know what impact the scheme would have. It is still unclear if TfGM understands the impacts of the scheme as it was only engaged in scrutiny of the scheme through the SoCG

73 Despite the scheme creating adverse impacts on the responsibilities of all these authorities, NH refused to take responsibility for addressing them, deeming them insignificant and, if related to traffic impacts, the responsibility of the highway authority.

Para 4.2g. It must minimise the environmental impacts of operating maintaining and improving the network and seek to protect and enhance the quality of the surrounding environment;

74 NH fails to meet this statutory direction as follows.

75 Operational GHG emissions have not been minimised as no traffic restraint measures were applied to the proposal⁶². The scheme would result in 410,000tCO₂ emitted over 60 years.

76 Hollingworth and Tintwistle - NH has failed to minimise the environmental impacts of the SRN as it passes through Hollingworth and Tintwistle. These two villages straddle the A628T, lie immediately east of the scheme and experience traffic congestion with long queues, air pollution from heavy lorries and increased road crashes. Every consultation about the scheme has raised key concerns around these two villages, found the plans did not address their problems⁶³, and showed strong support for measures to relieve traffic through both villages. In the 2018 statutory consultation⁶⁴ Highways England declared it ‘*is unable to resolve*⁶⁵’, that Hollingworth and Tintwistle are not part of the solution. During the 2020 consultation NH refused to engage with questions on Hollingworth and Tintwistle, stating that measures for wider relief are at an early

⁶² NH stated orally that no restraint was applied to the traffic model for the current scheme [EV-25 Issue Specific Hearing 2 Session 2 page 10 3rd line]. However when summarising its position at the Hearing, NH ignored the wider and deeper questions posed by the ExA about restraint of motor vehicles, encouraging active travel, and promoting routes which avoid the National Park. It referred only to restraint applied to HGVs in 2015 Trans-Pennine Routes Feasibility Study when testing options [REP4-008 Item 3d page 15].

⁶³Trans Pennine Upgrade Programme Non statutory Consultation Report Oct 2017 4.10.3

⁶⁴ Trans Pennine Upgrade Report 2018 4.2.1

⁶⁵ Trans Pennine Upgrade Report 2018 4.2.1

concept design stage. Given that traffic along the entire Trans-Pennine route will be affected by the scheme this is a serious oversight. A strategic approach towards long term planning for the whole of the corridor would have avoided this.

77 The surrounding environment that the scheme would harm includes the (a) Peak District National Park, (b) Glossopdale and (c) Greater Manchester.

(a) The first statutory purpose of the National Park is to protect and **enhance** natural beauty wildlife and cultural heritage (our emphasis). The Dark Peak, crossed by both the A628T and the A57 Snake Pass, is famed for its desolate and exposed tracts of moorland that stretch great distances, create a sense of remoteness⁶⁶ and are largely inaccessible to motor traffic. The noise from traffic on all these roads already affects the natural beauty and tranquillity of the Park up to a mile distant on open moorland⁶⁷. The increased traffic generated by the scheme would further harm these nationally important landscapes and impair their tranquillity. NH refused to recognise that the impacts of increased traffic through the Peak District National Park would be significant, as considered by the statutory authority for the National Park, and offered no mitigation. The objection from the PDNPA shows that NH's interpretation of the National Park's statutory purposes and associated policies does not meet the standard required of it by its s.62 duty under the Environment Act 1995.

(b) Within Glossopdale the local environment would be impacted negatively by more congestion, rat running on residential roads, noise, and air pollution. NH dismissed the impacts as insignificant.

(c) The scheme would have a major irreversible negative effect on local landscape and townscape which NH refused to recognise as significant [APP-063, 7.7.8]. The scale and formality of its infrastructure - dual and single carriageways, three concrete underpasses, two bridges, huge new junction, lighting, signage, embankments cuttings and false cuttings, drainage features, fencing, access tracks, new plantings - and its associated traffic would encroach on and fragment open countryside reducing its permeability for wildlife; destroy the individual character of the pastoral landscapes; and harm the setting of the historic village of Mottram and the openness of the Green Belt. The huge new junction where the scheme crosses the A57T is out of scale with the surrounding townscapes. The scheme consumes open land, a finite irreplaceable asset in the UK. It is both natural capital and strategic open space, which supports multiple

⁶⁶ Dark Peak, Landscape Strategy, PDNPA, 2009

⁶⁷ Peak District National Park, State of the Park Report 2000, p 40 - Until recently the National Park was a complete tranquil area apart from Bakewell and Tideswell. By the late 1990s three roads with an excess of 10,000 vehicles per day within the Park, including the A628, reduced the tranquil area by 50%.

ecosystem services critical to urban areas which have higher vulnerability to climate change due to their lack of habitats.

Licence Para 4.2h. It must conform to the principles of sustainable development.

78 The licence spells out sustainable development as *'encouraging economic growth while protecting the environment and improving safety and quality of life for current and future generations.'* All of the above impacts described in paras 51-77 indicate that the scheme fails to conform to the principles of sustainable development.

Licence Para 5.29 It must comply with or have due regard to Government policy.

79 The NPSNN 2014 is the framework for decision making but recognises that relevant national, regional and local policies are in play. In particular a series of provisions of the Planning Act section 104 are incorporated in the NPS, and some of its requirements are specifically stated in terms of other laws and regulations such as the EIA Regs 2017. When dismissing challenges made by us or other parties using other policies, NH quoted NPSNN as the sole framework of relevance to decision-making. The scheme fails to meet a number of NPSNN policies as follows.

80 NPSNN 4.3 requires that for a proposed development the ExA and SoS should take into account its potential benefits, and its potential adverse impacts. The transport assessment and modelling are fundamental to the environmental assessment. With so many omissions and unexplained spurious results within them, it is not credible to even attempt to reach a reasoned conclusion on the significant effects of the proposed development.

81 NPSNN 4.4 requires environmental, safety, social and economic benefits and adverse impacts, to be considered at national, regional and local levels. There was no local or regional assessment of the scheme's carbon emissions despite two sets of available data (BEIS UK carbon emissions national stats and local authority SCATTER budgets from the Tyndall Centre), and a third set of self-scaling data – a local/regional proxy – provided by the study area and traffic model itself (when corrected and fully transparent) [REP9-039]. Local adverse impacts of all kinds – social environmental and economic – were concealed from the public and stakeholders at consultation stage and underplayed during the EiP (see paras 23, 32; Appendix A b-g; Appendix B b-g; Appendix C c, f, i, j).

82 NPSNN 4.6 – projects should usually be supported by a local transport model to provide sufficiently accurate detail of the impacts of a project. The impacts on Glossopdale were withheld from the public as detailed above (see para 23 above) and then from the EiP. When pressure on the issue increased throughout the course of the EiP NH stated that the work had been done, and yet still refused to share their findings with the Examination [REP8-018, Q3.6]. NH's detailed analysis of the traffic on one select link

[REP9-029], Dinting Road, appeared to validate IPs' requests for further analysis of all of Glossopdale but none was forthcoming [REP12-022, 9.87.8].

- 83 NPSNN 4.15-4.17 invokes Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which sets out the information that should be included in the environmental statement. The assessment of GHG emissions does not conform to these requirements [REP8-029, 7.5]. First, it does not provide an accurate quantification of the scheme in isolation; second, it does not provide a proper quantification of the cumulative carbon emissions; therefore, the application is not compliant with the EIA Regulations [REP8-029]. NH's claim that the traffic model is 'inherently cumulative, or is 'compliant with DMRB', does not make the environmental statement compliant with the EIA Regulations on cumulative carbon emissions assessment.
- 84 NPSNN 4.26-4.27 lists the legal and policy requirements for consideration of alternatives, which are not exhaustive. As we have shown above the 2015 options appraisal was flawed and has not been reviewed. Therefore the scheme's status within the RIS, the 2004 Tameside Metropolitan Borough Council Unitary Development Plan 2004 and the Greater Manchester Transport Strategy 2040 is questionable.
- 85 NPSNN 2, 2.24, 3.2 and 4.64-4.66 address road safety. The increased risk of road crashes on the A628T corridor and on local roads means NH has failed to meet the requirements of NPSNN which quotes the Strategic Framework for Road Safety 2011⁶⁸.
- 86 NPSNN 5.11-5.12 Air quality considerations are particularly relevant where schemes are proposed within or adjacent to AQMA or nature conservation sites (including Natura 2000 sites and SSSIs), and where changes are sufficient to bring about the need for a new AQMA or change the size of an existing AQMA; or bring about changes to exceedances of the Limit Values, or where they may have the potential to impact on nature conservation sites. NH adjusted the modelling in a way which removed potential exceedances of limit values for nitrous dioxide within 2 local AQMAs (one on the A57 Dinting Vale through Glossop and one on the A628T through Tintwistle), on A57 High Street West through Glossop and on the Natura 2000 sites adjacent to the A628T. NH refused to assess air quality at any of these locations including the two AQMAs. Hence these NPSNN considerations have been ignored.
- 87 NPSNN 5.150 Great weight should be given to conserving landscape and scenic beauty in nationally designated areas. Despite the scheme causing traffic increases on cross-Park roads, NH refused to recognise this requirement, arguing incorrectly that the policy only applies to development that lies within the National Park.

⁶⁸ <https://www.gov.uk/government/publications/strategic-framework-for-road-safety>

- 88 NPSNN 5.152 requires NH when planning the SRN to avoid National Parks, in this case the Peak District National Park. This it failed to do. The 2015 Trans-Pennine Routes Feasibility Study focused only on the corridor through the National Park. In addition, the scheme would cause traffic to divert off the M62 outside the National Park onto the A628T within the National Park.
- 89 NPSNN 5.202 *Development of national networks can have a variety of impacts on the surrounding transport infrastructure including connecting transport networks... The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development.* NH dismissed the scheme's impacts on the local road network as insignificant and refused to consider mitigation. They also refused to share with the Examination the work they had done which justified their conclusion that the effects were 'insignificant'.
- 90 NPSNN 5.207 requires the WebTAG methodology to be followed. We showed above (paras 30-36 and Appendix B) how the TAR failed to meet the requirements of a WebTAG compliant appraisal.
- 91 Other policies with which NH failed to comply, or to which it failed to have due regard, include:
- (a) The Treasury's *Green Book 2020* identified the common failure of those writing appraisals to engage properly with the strategic context in which their proposal sits. Specifically, business cases frequently do not demonstrate the necessary understanding of:
- the proposal's specific contribution to the delivery of the government's intended strategic goals (such as levelling up or net zero); and
 - the specific social and economic features of different places and how the intervention may affect them;
 - other strategies, programmes or projects with which the intervention may interact, including in a particular geographical area.
- This results in significant flaws in appraisals and business cases. All of the above bulleted shortfalls apply to the A57 Link Roads, were initiated in the 2015 Trans-Pennine Routes Feasibility Study from which the scheme derives⁶⁹, and have led to the noncompliance described in paras 52-60 and 78-91 above, and here in para 92.

⁶⁹ Trans-Pennine Feasibility Study, Highways England & DfT, 2015

<https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports>

- (b) The UK Net Zero Strategy 2021 - NH made no assessment of significance of the scheme's carbon emissions against the annual carbon reduction targets and trajectories for transport in the Net Zero Strategy [REP9-039, 10].
- (c) The Government's Decarbonising Transport, A better greener Britain; Bus Back Better – National Bus Strategy for England; and Gear Change – A bold vision for cycling and walking. By omitting walking, cycling and public transport (except rail users with access to a car) from its transport assessment NH has failed to comply with all of these.
- (d) *National Planning Policy Framework 2021, para 175*. NH refused to recognise that great weight should be applied to protection of the National Park and its setting. The objection from the PDNPA shows that NH's interpretation of the National Park's statutory purposes and associated policies does not meet the standard required of its s.62 duty under the Environment Act 1995.

Summary of noncompliance with statutory directions in Licence

92 Through development of the A57 Link Roads NH is failing to meet the public interest and provide effective stewardship of the long term operation and integrity of the SRN. The value for money of the scheme has not been ensured as the options' appraisal was flawed and has not been reviewed. The scheme would be detrimental to the safety of the network, not protect or improve it. NH has failed to co-operate with the local authorities and the National Park Authority over a number of issues. It has also failed to minimise environmental impacts – carbon emissions would increase; traffic would impact adversely on two adjacent villages, on Glossopdale, on the Peak District National Park; the proposed infrastructure is out of proportion to and would disfigure local landscape and townscape. Consequently the scheme does not conform to the principles of sustainability. This is reflected in NH's non-compliance with Government policy in NPSNN, the Treasury's Green Book, UK Net Zero Strategy, Decarbonising Transport, Bus Back Better, Gear Change and NPPF.

(D) FAILURE TO HAVE REGARD TO GUIDANCE IN THE LICENCE

Licence Para 5.15 It should seek to ensure protecting and improving safety is embedded into its business decision making, and to achieve the best possible safety outcomes.

93 The 2015 Trans-Pennine Routes Feasibility Study included a safety objective, against which the scheme scored +1 (beneficial impact). For the 2020 statutory consultation and for the DCO application the safety objective was omitted, despite high accident rates and accident clusters along the route, as safety measures were progressed separately from the scheme (the A628T Safety and Technology improvements). However, as these

measures were included in the baseline traffic modelling and road crashes increased, the mitigation appears to fail. Thus the evidence suggests safety was not embedded in the decision-making for this scheme, which would now score negatively (adverse impact) against such an objective.

Licence Para 5.23 It should ensure protecting and enhancing the environment is embedded into its business decision making.

- 94 NH did not avoid the Peak District National Park when planning the SRN as required by NPSNN 5.152.
- 95 There was no scheme objective to address GHG emissions or climate change despite the 2008 Climate Change Act and the UK's legally binding carbon budgets.

Summary of noncompliance with guidance in the Licence

- 96 Although these licence conditions are considered guidance, rather than statutory directions, they are extremely important. They are both concerned with business decision making which starts with options' appraisal, followed by scrutiny by DfT. Unless the initial appraisal is robust and scrutiny is rigorous the result will be a poor choice. The A57 Link Roads have been developed as a standalone scheme in order to build demand for the next section of new road. For fifty years NH and its predecessor organisations have been trying to force road building to link Manchester and Sheffield rather than address the transport issues within their strategic context. The Peak District National Park designation, through which the A628T corridor passes, does not permit major development unless there are exceptional circumstances and it is in the public interest. Most recently the climate and nature emergencies, and the experience of the Covid pandemic, also challenge the business-as-usual model of building roads to meet future traffic demand. The 50 year history of failed road solutions should be indication enough that what is required here is a fundamental rethink. The National Park designation and more recent events demand it. That is the context within which these licence conditions should be considered.

(E) CONCLUSION

- 97 We have documented above a catalogue of NH's non-compliance with the statutory directions and guidance laid down by the SoS in its licence. NH has evidently failed to meet baseline requirements, never mind meet higher expectations. The whole sorry story casts strong doubts on the credibility of NH and its evidence for the A57 Link Roads DCO application.
- 98 NH withheld crucial information, gave inconsistent, inaccurate or misleading statements and answers through the statutory consultations and the EiP. It repeatedly tried to

wriggle out of accountability for the scheme with obfuscation and delay. This is contrary to behaviour expected of a public agency to be as open as possible about all its decisions and actions, and to restrict information only when the wider public interest clearly demands.

99 The development of the scheme, from the 2015 feasibility study out of which it emerged to the DCO application, demonstrated all that the Treasury Green Book identified about the failure of project sponsors to engage properly with the strategic context in which their proposal sits. With respect to the A57 Link Roads NH failed to address (a) the proposal's specific contribution to the delivery of the Government's intended strategic goals in 2015 (such as climate change) and in 2021 (such as levelling up and net zero); (b) the specific social, environmental and economic features of Greater Manchester, Glossopdale, Longdendale and the Peak District National Park and how the intervention would affect them all; and (c) a raft of other strategies, programmes and projects with which the scheme would interact from the national to the more local. These ranged from addressing climate change and road safety - both key policy areas identified by the ORR for RIS3⁷⁰ - to Greater Manchester's transport decarbonisation programme through its Right Mix policy, and the PDNPA's goals to reduce traffic within, and through, the National Park.

100 The consequences of both NH's behaviour towards engagement with stakeholders and the public, and its failure as the steward of the long term sustainable future and integrity of the strategic road network, led to multiple areas of non-compliance with its licence conditions. These were demonstrated through the statutory consultations which failed to follow best practice; the transport assessment accompanying the DCO application which failed to meet the standard expected of a WebTAG compliant appraisal; the failure of the proposed scheme to conform with the principles of sustainable development; and finally through the EiP, the effectiveness and efficiency of which was compromised by NH's omissions and obfuscations. At the end of the EiP the ExA was still asking fundamental questions about NH's evidence, and new evidence that conflicted with NH's evidence was presented and left unscrutinised. The result is that neither the ExA nor the SoS have the information needed to weigh up the planning balance. The overall effect is to limit democratic involvement and accountability.

101 The ORR has recently identified that where projects fail to be delivered on time, most of the delays occurred during the development phase – before construction begins. Statutory planning processes were one of the four most prevalent risk factors. In our experience it is not the statutory planning processes, red tape or regulations which

⁷⁰ Road Investment Strategy 3 Our role and approach, May 2022, ORR, 3.4a and 3.4b
<https://www.orr.gov.uk/search-news/gearing-third-road-investment-strategy-ris3> ;
<https://www.orr.gov.uk/sites/default/files/2022-05/Road-Investment-Strategy-3-our-role-and-approach-2022-05-04.pdf>

have hindered the effectiveness of the A57 Link Roads DCO application and its EiP but NH's approach and behaviour towards consultation and the planning system. Any subsequent delay to delivery of the scheme - the scheme is at risk of missing its start of work commitment⁷¹ - can be laid wholly at NH's door, through its behaviour, its attempts to conceal the real effects of the scheme, its failure to engage robustly in discussions, its failure to have due regard to its legal duties and Government policy, its failure to plan within the appropriate strategic context.

102 These shortfalls in performance do not appear to be picked up when monitoring NH's performance. Although the key performance indicators (KPIs) test how well NH manages traffic on the SRN and how quickly it delivers its enhancement projects, they do not robustly test NH's role as the steward of the SRN's long-term future and integrity, fit to meet all the challenges of this century in a sustainable way⁷². For example, in the 2021-2022 assessment of performance, the focus is on individual project delivery with no mention of the strategic context of wider Government policy⁷³. Consequently, there does not appear to be a robust framework for monitoring all of the licence conditions.

103 Some of the non-compliance we have documented e.g. taking a piecemeal approach to addressing issues along a corridor instead of strategic long term planning, raise fundamental issues not only about the preparation of the RIS by DfT and of route strategies by NH, but also about the testing by DfT of potential projects as they pass through their development stages. The final stages for an NSIP - the statutory consultation and the DCO application - are deeply flawed. To have received holding objections from the statutory consultees in response to the 2018 consultation on the scheme, and to have not addressed those concerns before holding another statutory consultation smacks of both incompetence and disregard for standards of best practice. An effective approach would have been to address all the statutory consultees' concerns and to then seek public views before proceeding to a DCO application. Development of a NSIP should be front loaded with a WebTAG compliant transport appraisal and full environmental impact assessment available for public scrutiny before the formal DCO process is entered. The EiP would then be able to proceed as it appears to have been envisaged – to iron out technical issues with planning agreements. In view of what we have experienced we believe a review of all these processes is required and that monitoring of them should be more robust.

104 Two key areas are highlighted by the evidence we have presented - environmental issues and engagement with stakeholders, organisations and the public. Environmental impacts and objections on environmental grounds are a key risk to the achievement of

⁷¹ Annual Assessment of NH's Performance 2021-2022, ORR, July 2022, Table B11

⁷² Annual Assessment of NH's Performance 2021-2022, ORR, July 2022

⁷³ Annual Assessment of NH's Performance 2021-2022, ORR, July 2022

planning consents for road schemes⁷⁴ yet environmental issues are not addressed through the RIS and only at a late stage of the NSIP process when the DCO application is submitted. This means adverse impacts are only picked up very late through a process which is not geared to addressing fundamental issues, only to tinkering around the edges. The entire programme being considered for RIS3 (whether carried over from RIS2, or new schemes) must be assessed within a Strategic Environmental Assessment as required by the Infrastructure Act 2015 and the Strategic Environmental Assessment Directive. Schemes should not enter the RIS unless they have been subject to a full and proper appraisal. Once chosen the options appraisal should be regularly reviewed to ensure the scheme remains the best performing, sustainable and cost effective option. The full environmental assessment and the transport appraisal on which it is based should be the subject of scrutiny through the statutory consultation, as we have noted above.

105 With respect to engagement there is no KPI. A review two years ago⁷⁵ of NH's engagement and cooperation with regional and local partners, but not the public or communities, concluded that *'Highways England is complying with the prescribed elements of its licence engagement duties but there is scope for further development of its duties to support regional and local stakeholders and manage their expectations'*. It specifically drew NH's attention to *'recognition of the obligations and priorities of local stakeholders, for example in areas such as decarbonisation and air quality'*. Through the A57 Link Roads, NH's response to stakeholders concerns was the reverse of the ORR's advice – it denied their significance and/or their legitimacy to be considered, of which the most extreme examples were to take no account of Greater Manchester's well developed approach to decarbonisation through radical changes in travel behaviour, or of the views of the statutory authority for the National Park, the PDNPA. Our experience also showed how poorly NH has failed to engage with communities and the public. Engagement must be formally addressed and monitored, as engagement worthy of a public body applies to all elements of the licence. The ORR has promised to review assessment of engagement as part of NH's RIS2 and RIS3 plans⁷⁶ but this should be extended to cover community and the public's engagement in project development.

106 NH receives huge sums from the public purse - in financial year 2020-2021, it spent £160,527,000 on staff and £3,198,000 on consultancy fees⁷⁷ - and is responsible for spending the £24billion committed to the 2020-2025 roads' programme. For that the public would expect NH's performance to at least meet the requirements of the licence, if not the extra mile, and for robust monitoring of that performance.

⁷⁴ Road Investment Strategy 3 Our role and approach, May 2022, ORR, para 3.50

⁷⁵ Review of Highways England's engagement approach with regional and local partners, June 2020,

⁷⁶ Road Investment Strategy 3 Our role and approach, May 2022, ORR, 3.71c

⁷⁷ Highways England Annual Accounts and Reports 2021

107 With respect to the A57 Link Roads we therefore urge the ORR to assess NH's performance in the light of this representation to you and report its findings to the SoS before he makes a decision on the scheme in mid-November 2022. More generally we urge the ORR to enforce behaviour that is expected of a public body and to review the overall monitoring of NH's licence. In particular, we suggest that the ORR a) reviews development of DfT's RIS and NH's route strategies to ensure that schemes that arise from them meet all the criteria for sustainable development, especially with regard to the climate and nature crises; b) insists on, or provides, much more robust assessment and monitoring of scheme development from options appraisal through to project business case; and c) reviews or instigates a review of the complete NSIP process.

APPENDIX A

OMISSIONS AND MISREPRESENTATIONS IN 2020 STATUTORY CONSULTATION

- a. There was no transport assessment, traffic data or traffic modelling results; this despite the SoCC p5 promise of *'more information about key environmental impacts including air quality, noise and traffic.'* Later when presenting draft traffic information to the local authority steering group NH⁷⁸ *'confirmed this was the data presented within the Preliminary Environmental Information Report (PEIR)'*. No traffic data was presented in the PEIR or available to the public until the DCO application was submitted.
- b. There was no mention in any of the documents of the impacts of increased traffic, all generated by the scheme, on Glossopdale. This would lead to rat running on residential streets to avoid congestion on the A57 through Glossop. People were unaware that, with the scheme, the walk or cycle to school, work or the shops would become more intimidating, dangerous and unpleasant; congestion would increase journey times for drivers within Glossopdale; road crashes would increase. The FAQ gave the opposite impression. *'Will the scheme create traffic in other areas? What about Glossop?'* was answered as *'Our traffic assessment shows that overall, the scheme draws traffic on to the strategic road network and off local roads. Therefore we wouldn't expect to see a significant increase in traffic through Glossop during peak times.'* This misrepresentation was only revealed through the EiP.
- c. The infrastructure for the scheme lies within the National Park setting and ~2km from its boundary. There was no mention of the increased traffic on trans-Pennine routes through the National Park or its impacts on tranquillity, wildlife and road crashes, again all only revealed through the EiP.
- d. The whole scheme lies within and crosses the Green Belt yet the word Green Belt appeared only once in - PEIR Vol 3 with respect to the Planning Act 2008. There was no mention of the strict policies surrounding Green Belt, no map of the Green Belt, no mention of the scheme's profound impacts on four of the five functions of the Green Belt and its harm to openness, as revealed by the EiP. Of all planning policies, Green Belt is the best known, best loved and best understood by the general public but it was completely excluded from all the consultation documents.

⁷⁸ APP-026 Consultation Report [Table 3-2] accompanying the DCO application, published July 2021

- e. Safety was only addressed in the FAQ where a misleading impression was given. Improving safety for road users was described as a key objective of the A57 Link Roads, but there was no such objective. Safety benefits improvements were implied: *'Our traffic assessment shows the scheme reducing accidents across the local area, because traffic will be moved onto more modern roads.'* There was no mention of the increased risk of road crashes in Glossopdale and on trans-Pennine routes which came to light in the DCO application.

- f. The economic justification for spending £225m (later reduced to £180m) on the scheme was not made. The statement in the brochure that congestion *'restricts potential economic growth, as the delivery of goods to businesses is often delayed and the route is not ideal for commuters, which limits employment opportunities'* was not informed by evidence.

- g. The colour brochure showed prejudicial bias. It focused to the exclusion of all else on the immediate benefits to residents in Mottram and on Woolley Lane and on the engineering and design changes made since the 2018 consultation. There was no mention of Glossop as a township that might be affected by the scheme – the word Glossop appeared only twice in the brochure to explain that the *'Glossop bound'* traffic would be separated. There was not a single mention of GHG/carbon emissions despite the all-pervasive climate emergency and the fact the scheme would increase these emissions. There was no mention of road safety or of the adverse impacts on the Green Belt. With more pressing issues such as the Covid pandemic on people's minds, the brochure is likely to have been the only document the majority would have read. Its systematic distortion and concealment of the scheme's effects misinformed people as to the effects on their well-being and quality of life.

APPENDIX B

OMISSIONS AND FLAWS IN TRANSPORT ASSESSMENT REPORT

a. Traffic modelling – No details appeared in the TAR. In three and a half pages it named the modelling software and used three figures to show the modelled area and local zone disaggregation. There was no local model validation report, no forecasting report, no options report, no strategic case report, no economic case report, no appraisal summary table.

(i) Assumptions and factors which were built into the model and the values ascribed to these factors were not available to stakeholders or to the ExA.

(ii) No information was available as to how public transport, walking and cycling were dealt with in the model. Late in the EiP NH revealed that only rail trips for households with a car were included. NH continued to confuse the definitions between rail, public transport as a whole, trips which were included or not included in the model and in fact how the limited rail modelling was undertaken [REP9-040, Q3.4, page 5].

(iii) The source of errors in terms of model parameters and specification were concealed from the EiP. NH stated⁷⁹ they were captured in the high and low growth sensitivity tests but provided no details.

(iv) The impacts of the scheme on transport networks in Greater Manchester, despite the majority of journeys being within it, were not presented. Later NH revealed that the scheme was treated as an isolated bypass with limited access to Greater Manchester, with a fixed cost function and masking applied to Greater Manchester within the model.

(v) Data from various sources was used to calibrate the model but how it was applied was not fully explained or given in sufficient detail. Conflicting statements were made about updating the model⁸⁰.

(vi) Inconsistencies in the outputs from the model remained unexplained at the end of the EiP on a number of routes through and within Glossop, Hadfield and Padfield, and along the A628T⁸¹. NH dismissed IPs' attempts to understand these as mistaken⁸² but failed to supply

⁷⁹ REP11-010, 3.3. NH response to ExA's Third Written Questions

⁸⁰ APP Data was collected during 2020-2021 according to the Case for the Scheme 4.3.5 and 4.3.6 for model development. NH refuted this and said only 'historic' data was used REP9-027/9.79.111

⁸¹ REP8-034, 9.69.16; REP9-043; REP10-012, pp 2-3

⁸² REP9-043 Response to PD-014 - Report on Implications for European Sites

a valid explanation for the majority of these or to provide specific data to validate its arguments.

(vii) The EIA Regs Schedule 4 para require *'a description of the relevant aspect of the current state of the environment (baseline scenario)'*. This is essential to understanding the current traffic situation and how it would change with the scheme. With the impact of Covid 19, the most recent actual traffic flows would be 2019. Instead NH used traffic surveys from 2015-2016 and modelled them to create the 'do minimum' scenario in 2025 against which to test the impacts of the scheme. This is not a 'current baseline' and led to a number of discrepancies when comparing the 2025 'do minimum' with existing counts from the DfT traffic website – some flows were much greater, others much lower.

All the above led to enormous problems with understanding the outputs from the traffic model.

b. Road crashes – The TAR, like the consultation documents, maintained there would be *'reduced safety risks within the built up area...'* (TAR Executive Summary). The built up area includes Glossopdale where High Peak Borough Council's Local Impact Report [REP2-046] showed an increased risk of road crashes on residential roads in Glossop. NH excluded from assessment residential roads on *'which the scheme is not expected to have an impact'⁸³*, roads which we now know through the EiP process, and which NH knew when it submitted the DCO documents, would have more traffic as a result of the scheme and therefore more crashes. The evidence presented in the TAR is the shockingly poor Figure 7.8 of the spatial distribution of safety impacts (the scheme incurs a safety disbenefit of -£7.32m over 60 yrs) which is too crude to decipher in the built up areas.

c. Severance – the word does not appear in the TAR. In Environmental Statement (ES) Ch12 NH's concern is wholly with severance of land holdings and reducing community severance on the bypassed A57T⁸⁴. Nowhere is NH concerned with the severance experienced by those attempting to cross the A628T in Hollingworth or Tintwistle (despite the *'high number of pedestrian accidents'⁸⁵*), the A57 through Glossop or residential roads in Glossopdale where traffic generated by NH's scheme would increase.

d. HGVs –The high percentage of HGVs along the trunk route subjects people, communities and the fabric of buildings adjacent to the road to severe impacts. The TAR barely addresses the issues⁸⁶. The scheme removes HGVs from part of the A57T but not from the A628T through Hollingworth and Tintwistle or from the A57 through Glossop. Yet the TAR does not

⁸³ TAR Figure 3.8 The Case for the Scheme 4.5.2;

⁸⁴ ES Ch. 12. 12.9.84

⁸⁵ Trans-Pennine Routes Feasibility Study 2015, Stage 1 Report 1.2.11

⁸⁶ TAR 1.1.2, 3.7.14 HGV percentages and numbers are given in Table 3.8 and Figures 3.6, 4.8, 7.1, 7.2, 7.5 and 7.6.

address their potential diversion to avoid congestion along these routes, or the severance, the intimidation, the risk of road crashes, the disincentive to walk or cycle on these routes that HGVs impose. NH's only concern is for the small length of the trunk road that would be bypassed. This is in direct contradiction to NPSNN's insistence at para 5.202 that impacts on local road networks must be taken into account.

e. Journey time savings – The TAR spells out the importance of journey time reliability (para 1.1.1), which features in the scheme's objective for connectivity (para 1.2.1), and provides monetised benefits worth £11m (para 7.2.6). Despite their significance, journey time savings were presented only as partial parts of journeys, not actual journeys the travelling public would make. Journey time savings on the SRN between Manchester and Sheffield were given for a 10-mile stretch of a 40-mile journey between the city centres and avoided the congestion that would be met within both urban areas. NH's main argument was to claim¹³ that journey times are captured in the modelled road network, which is no substitute for presenting specific evidence. The reason for NH's resistance became clear when it revealed Sheffield to Manchester journey time savings as ~5 minutes [REP5-022, 9.54.64]. This answer meant that claimed city-to-city journey time savings would be significantly reduced - for the 10-mile stretch eastbound savings were predicted as 8-10mins and westbound as 5-6mins – which would substantially reduce the value for money of the scheme and hence the Benefit Cost Ratio.

f. Public transport – There was no assessment of the potential for car journeys to switch mode to public transport, or of the time delay that would be experienced by bus passengers on routes which would see increased traffic. In TAR 3.4.11 NH claimed bus services '*will benefit from improved journey times and reduced congestion*'. This was revealed as a misleading assertion without evidence; in response to the ExA's questions⁸⁷ NH admitted it had not assessed bus times. Bus journey times should have been supplied in the TAR. When they were finally supplied [REP6-017 Appendix A] some improved and some took longer with the scheme.

g. Impacts on Glossopdale – we have detailed these above. The TAR referred only to journey times from Glossop (para 7.1.16) and to '*small increases in accidents through Glossop*' (para 7.2.13), by implication on the A57. Repeated requests for a proper assessment using a local model were refused, despite the requirements of NPSNN 4.2.

⁸⁷ REP7-020 Response to ExA's Written Questions, question 3.14, pp 28-29

APPENDIX C

WITHOLDING OF CRUCIAL EVIDENCE DURING EXAMINATION OF DCO APPLICATION

a. Assessment of public transport

This was important in view of the strong policies in Greater Manchester for radical reduction of car trips and increased travel by public transport, walking and cycling. In order to understand how NH had assessed travel by all modes it was necessary to know how the traffic model dealt with this. This was not disclosed by NH until 5th April Issue Specific Hearing (ISH) despite constant reference to public transport in our emails, at technical meetings, and through requests for clarification. When we first asked NH in July 2021 how public transport was included in the model, we were referred to the transport modelling and forecasting reports submitted with the DCO. As stated above (Appendix B a.) there were no transport modelling or forecasting reports submitted with the DCO, only the TAR which told the reader nothing about how public transport was assessed. Furthermore neither the Transport Modelling nor Transport Forecasting Packages⁸⁸ supplied to us in November 2021 contained that information. Despite two meetings with NH, we were still asking for clarification in March 2022. To aid progress MTRU asked NH to confirm our understanding with a suggested statement for us to agree with NH within a SoCG: *“The model contains public transport trips by people who have a car available but not by other users. In addition, only trips with either an origin or destination in the Area of Detailed Modelling are actively modelled. All other public transport trips are fixed.”* We received no reply and were only answered orally during the ISH on 5th April and by writing [REP8-018 page 55]. However, even that answer contained obfuscation as there were apparently two traffic models for the scheme – a regional mode choice transport model to forecast mode shift and a traffic model.

b. Review of appraisal options

(i) In order to establish if the scheme continued to be the best option since it was chosen in 2015, it was important to establish if a strategic level re-assessment of options had been undertaken since the original sifting of options in 2015⁸⁹. The Treasury’s Green Book 2020 advises that options should be checked at each stage of the Business Case process, updating of the appraisal options is expected for all schemes in the RIS⁹⁰, and since 2015 addressing the climate and nature crises has become urgent. Another strong reason for review was the lack of a suitable traffic model for the 2015 Study. As a result the Study noted (Stage 3

⁸⁸ REP2-090 – Transport Modelling Package pdf pp 98/790; Transport Forecasting Package pdf page 256/270;

⁸⁹ A57 Link Roads 6.3 ES Chapters 1-4 Introductory Chapters Planning Inspectorate scheme reference: TR010034 Application document reference: TR010034/APP/6.3 para 3.3 Page 97 of 134

⁹⁰ RIS1 2015-2020 para 2.12; Treasury Green Book November 2020

Report 4.2.17) there is ‘a risk that forecasts developed using a new traffic model may differ from those produced as part of this assessment.’

(ii) NH’s answers when questioned on this matter were changeable. It first confirmed in August 2021 ‘that we have not repeated the Early Appraisal Sifting Tool (EAST) since finalising the options in 2015’. It then used timing as an excuse not to undertake the review - ‘The updated Green Book postdates consideration of alternatives to the Scheme and selection of the preferred option⁹¹’ - ignoring the fact that the need for review continues after selection of the preferred option. When questioned by the ExA, NH then claimed it had undertaken a review, using changes to design or exclusion of certain elements⁹² which is not what a strategic review of the options appraisal is about. When challenged on that argument it reverted to its original position of not having undertaken a review because ‘it would not be practicable’⁹³. We therefore concluded that NH had not undertaken a review as required by RIS and the Treasury Green Book. Trying to show it had undertaken the required review when it had not emphasised how poorly NH has followed procedure and how it sought to conceal this from the EiP.

c. Explaining the spurious traffic data

(i) The outputs of the traffic model, i.e. the predicted traffic flows and their distribution, nature and composition, were fundamental to all the evidence about the scheme’s effects on the transport networks, on road safety and on the environment, society and the economy. Clarity is required on both the model’s limitations and its outputs. Our lack of confidence in the modelling and its results increased throughout the EiP, was shared by other interested parties (IPs), and was comprehensively expressed through a joint letter to the ExA [REP10-017]. It was also shared by the Peak District National Park Authority⁹⁴ and by High Peak Borough Council⁹⁵.

(ii) Initially NH relied on blanket statements that it had absolute confidence in the traffic modelling, which is no substitute for open, comprehensive and consistent presentation of data and for engaging with challenges constructively. Later it described the process in some detail but the outputs – the spurious and extraordinary traffic modelled results - were not explained. It persisted with addressing questions about content with answers about methodology. It used arguments that did not withstand scrutiny and, when challenged, provided the same arguments. It failed to engage with substantive evidence submitted by us and others, and provided vague and unintelligible answers to questions. This severely impeded understanding of the traffic data and the scheme’s impacts and led to the ExA asking serious questions about the traffic modelling even as the EiP closed.

⁹¹ REP7-025, 9.69.8

⁹² REP8-019, 9.75.34

⁹³ REP10-010, 9.84.13

⁹⁴ REP2-048 Local Impact Report 7.2.1

⁹⁵ REP2-046, High Peak Borough Council Local Impact Report, 19.1

(iii) Three working days before the EiP closed, NH supplied some explanation as to the disparities between some of the DfT observed traffic flows and modelled traffic flows in the 'do minimum' 2025 scenario [REP11-010, 3.1 page 13]. These explanations exposed local zone limitations as the cause of some of these disparities. These limitations are a good reason for using a more defined model of Glossopdale, something we and others had repeatedly requested throughout the EiP and been denied, and which NPSNN 4.2 requires.

(iv) Public interest in the integrity of the traffic modelling was extremely important for this scheme. The 2007 public inquiry into the Mottram-Hollingworth-Tintwistle bypass (the previous iteration of the scheme) was formally adjourned in December 2007 after 10 days of hearings due to serious flaws and repeated errors with the traffic model. Revised traffic figures due to an error in the traffic modelling were followed by further inconsistencies in feeding data into the traffic model⁹⁶ which ultimately rendered the results of the model null and void. The statutory consultees were unable to validate the traffic model and the public inquiry was formally closed in March 2009.

d. Uncertainty Log

NH's failure to engage constructively is also well demonstrated by its approach towards our challenge of the Uncertainty Log. In our written representation [REP2-069 4.2.11-4.2.17] we raised issues about the Uncertainty Log with respect to future development. A limited list was appended to the ES Ch.15 on Cumulative Effects. We found a much longer list in the Traffic Forecasting Package NH supplied to us [REP2-090, Appendix B, pdf pp 337/790]. We compared the results given in the DCO application documents with those available in the Traffic Forecasting Package, pointing out data was missing and asking for clarification on how the model had addressed future development. NH offered '*Details of the schemes and developments listed in the Uncertainty Log can be provided by National Highways if necessary*'. We responded '*As offered, please may we see the complete list, ie the long list and the short list, of schemes and developments excluded and included in the Uncertainty Log*⁹⁷'. NH responded⁹⁸ '*The uncertainty log is included in Appendices B & C of the Traffic Forecasting Report that has previously been provided by National Highways to CPRE*'. These were the very appendices which we had analysed in REP2-069 and to which we were seeking details and clarification. This circular game playing by NH was obstructive and did not address our concerns.

e. Investigation of Mottram Gyratory Flow (MGF)

⁹⁶ Mottram Tintwistle Public Inquiry 2007 HA-73 December 4th 2007; the Highways Agency announced that no more information would be available until late February 2008. It failed to meet this deadline and further deadlines in May 2008 and then October 2008.

⁹⁷ REP5-028, page 10

⁹⁸ REP7-025 9.69.18 page 14

One IP Mr Bagshaw presented the MGF as an alternative to the scheme. When asked by the ExA if the MGF alternative had been considered previously NH's response was an unequivocal 'No'⁹⁹. *'The Mottram Gyrotory Flow alternative presented in Mr Bagshaw's submission was not one of the alternative options considered by National Highways'... 'The scheme previously proposed and presented in Mr Bagshaw submission was not one of the potential alternative solutions identified through this process'*. Towards the end of the EiP¹⁰⁰ the ExA was obliged again to ask NH to clarify its position as to whether the MGF, or a similar scheme was considered through options appraisal. The NH completely reversed its reply both orally at the hearing and in writing to a definitive 'Yes'. *'The option submitted by Mr Bagshaw was presented as an alternative scheme at the public inquiry of 2007. A scheme looking at a gyrotory system in the area of Mottram was assessed in 2015 as part of the EAST study; these were forwarded on to the DfT for consideration but were not included in RIS1¹⁰¹'*. Thus two directly contradictory answers were given by NH. Mr Bagshaw then showed that it had not been examined as a standalone option but only as an addition to the current scheme (REP8-042 para 5 pp 5-8).

f. Increase in vehicle kms

Both the TAR (7.2.9) and ES Ch.14 Climate referred to increases in vehicle kilometres generated by the scheme but no absolute figures were given. NH twice gave the opposite impression: *'Total vehicle kilometres across the appraised road network are effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic... and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys¹⁰²'*. Only in response to a question from the ExA, on 13th April (10 months after we originally asked for the figures) did NH reveal the increases in total vehicle kilometres due to the Scheme would be +0.7% (on approximately 12,000,000 daily veh-km in 2025) in the area of detailed modelling and +9.5% (on approximately 410,000 daily veh-km in 2025) in the Local Study Area¹⁰³. NH not only refused to supply the absolute figures to us but also denied there would any increase in vehicle kilometres.

g. A sensitivity test on the carbon emissions

NH submitted the results of the test but did not make the methodology of the test available¹⁰⁴. Nor did NH explain how the test affected the significance of the carbon emissions associated with the scheme. The validity of this test awaits DfT approval at some

⁹⁹ REP6-017 NH responses to ExA's second written questions Q3.8a

¹⁰⁰ REP8-019 Issue Specific Hearing 9.75.34 (kk) page 20

¹⁰¹ REP8-019 NH written summary of oral hearing 9.75.34 (kk) page 20

¹⁰² REP1- NH response to Relevant Representations RR-0543 page 147, 1st December; REP2-022 4.1 page 59

¹⁰³ REP8-019, 9.75.6

¹⁰⁴ REP5-026 2.2.5 onwards and Table 1; REP8-018 Appendix A

time in the future. Given this, it was incredible that this data was provided to the ExA as if it might add value to the ExA's recommendation to the SoS.

h. Visibility of the eastern portal of the underpass to the public

ES Ch.7, 7.9.25 implied that the eastern portal of the Mottram underpass would be visible from publicly accessible viewpoints. *'Views represented by Viewpoint 5 would be more open, with visibility of the new underpass structure and the cutting slopes present at the eastern portal'*. During site visits we searched from around Viewpoint 5 (on a public right of way) for visibility of the underpass structure but could not find it, and requested an accompanied site visit to view the eastern portal. In response NH considered *'that **all parts of the Scheme can be viewed from publicly accessible land, and thus we do not consider that an Accompanied Site Inspection will be required**¹⁰⁵'* (our emphasis). When we asked NH (email 22nd November) from where a full view of the eastern portal could be seen, it responded (21st December 2021) *'the only views of the eastern portal would be visible from private agricultural land containing no sensitive receptors'*. This is a complete contradiction to *'all parts of the scheme can be viewed from publicly accessible land'*.

i. Godley Green Garden Village (GGGV)

(i) GGGV is the largest proposed development within Greater Manchester, is included in Greater Manchester's emerging spatial framework Places for Everyone and would lie 1Km from the scheme on a road that joins the M67 J4 roundabout, at the western end of the scheme. The allocation is proposed to deliver 2,350 dwellings and would generate approximately 529 to 1,057 two-way vehicle trips during peak hours¹⁰⁶. Clearly this is a major development which would interact with the scheme. NH's approach towards the scheme's interaction with GGGV provided two diametrically opposed stances.

(ii) NH's assessment¹⁰⁷ for the DCO application records *'no significant cumulative effect'* as a result of the scheme with the GGGV development, a conclusion which is directly contrary to the Places for Everyone assessment in which NH participated. The latter records that traffic generated by this allocation is *'likely to result in material implications on the operation of the SRN that would require mitigation*¹⁰⁸ *'* at both the M67 J4 roundabout and M60 J24

¹⁰⁵ PDL-001 Letter dated 1st November 2022 to ExA regarding the Preliminary Meeting of the Examination

¹⁰⁶ 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

¹⁰⁷ ES Ch.15 Table 15-7 row 42

¹⁰⁸ 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

Denton Island¹⁰⁹ which lies 5-miles west of the scheme along the M67. Outside the EiP NH behaved as if the scheme would have significant effects: in response to TMBC's 2021 planning application 21/01171/OUT for GGGV, NH submitted a formal recommendation¹¹⁰ that planning permission is not granted for a specified period, as it did not have '*sufficient comfort that the development would not cause a detrimental impact to the SRN.*' The conclusions that NH reached in regard to the scheme's cumulative effects with GGGV are contrary to those evidenced by PfE and its own response to the planning application.

j. Transport for Greater Manchester's SOCG with NH

A prime example of delay is the handling of the SoCG between NH and TfGM. The initial version indicated TfGM was concerned with detailed design of traffic management [APP-192] but the second version in January 2022 briefly alluded to concerns about strategic planning issues [REP2-019]. The nature of the latter were not revealed until the next and final version of the SoCG appeared 4 months later during the final hours of the EiP [AS-010 and REP12-010]. Several new issues and new angles on known issues were disclosed as of concern to TfGM, all too late for scrutiny within the time frame of the EiP.

¹⁰⁹ 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

¹¹⁰ https://publicaccess.tameside.gov.uk/online-applications/files/9976136762C94B11142AEDBDD186C191/pdf/21_01171_OUT-CONSULTATION_RESPONSE_-NATIONAL_HIGHWAYS-1539049.pdf

Submission number: 5

Date submission received by PINS: 6 October 2022

Name: High Peak Green New Deal

High Peak Green New Deal

Anne-Marie Trevelyan
Secretary of State for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR

6th October 2022

Proposed A57 Link Roads

Dear Secretary of State

On November 16th you will be making the decision as to whether these proposed new roads, between Glossop and Stalybridge, will be built.

We have been speaking to people in Glossopdale, on their doorsteps and in the town centre, on many occasions over the last few months, and we have found that the vast majority are totally opposed to this plan.

Even Highways England have admitted ' this scheme does not do anything to relieve congestion in Glossop but attracts more traffic along the A57.'

It is the people who live in Hollingworth and Tintwistle, where lorries thunder past their doors, rattling their windows, who are most disappointed that this road will do absolutely nothing to reduce the noise and pollution which blights their lives.

We have been collecting signatures for a petition calling for abandonment of the road building plan and investing just 5% of the money saved into sustainable local travel. **Low Carbon Travel for Longdendale and Glossopdale**, which includes a weight restriction on through traffic of heavy lorries and investment in buses, walking and cycling (summary enclosed), has been submitted to you recently by CPRE PDSY.

This has met with an enthusiastic response from most of those we have spoken to and must surely be the way to go if the UK is to meet its net zero targets.

We will be sending the petition to you, along with the many comments from local residents which it contains, on November 6th.

Yours sincerely



Linda Walker
Co-ordinator High Peak Green New Deal



RECEIVED



The countryside charity
Peak District and
South Yorkshire

LOW CARBON TRAVEL FOR LONGDENDALE AND GLOSSOPDALE

CPRE Peak District
and South Yorkshire

September 2022

Summary of full report
by Keith Buchan, MTRU



CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future

www.crepdsy.org.uk

Registered Charity No.1094975

Registered Company No. 4496754

LOW CARBON TRAVEL FOR LONGDENDALE AND GLOSSOPDALE

What's the problem?

The Longdendale villages of Tintwistle, Hollingworth and Mottram beside the A57/A628 trunk route experience severe environmental pollution from through-traffic of heavy lorries and commuter car traffic from Glossopdale. Travel in the area generates:

- High carbon emissions from traffic. Once released carbon emissions remain in the atmosphere for about 100 years. To have any chance of meeting carbon reduction targets, emissions need to be cut as soon as possible;
- Noise, air pollution and severance created by heavy traffic on residential roads;
- Noise, air pollution, severance and landscape impacts from the same traffic in the Peak District National Park;
- Unreliable journey times;
- Poor local conditions for walking and cycling which inhibit active lifestyles leading to poor health;
- Delays to local buses;
- Long journey times between Manchester and Sheffield.

Although the proposed A57 Link Roads (dual carriageway bypass of Mottram, single carriageway link to Glossop) would reduce traffic and its associated air pollution on Hyde Road in Mottram and Woolley Lane on the edge of Hollingworth (if traffic calming measures are effective), it would increase traffic, congestion, carbon emissions, air pollution, noise, road crashes and severance in Hollingworth, Tintwistle and Glossopdale. Its claim to alleviate unreliable long journey times is unsubstantiated. The scheme's infrastructure has profound impacts on the Green Belt, would increase traffic through the National Park and requires demolition of property. In order to avoid all these impacts CPRE the countryside charity sought a solution that would benefit everyone.

How would *Low Carbon Travel* address the problem?

A solution tailored to relieve Glossopdale and Longdendale of traffic impacts, enhance local countryside as a green lung for Greater Manchester and make door-to-door journeys by bus, foot or cycle a realistic, attractive and convenient option. CPRE's *Low Carbon Travel* includes:

- 1 Green Travel Planning for all;
- 2 Weight restriction of through traffic of heavy lorries;
- 3 Returning streets to the people;
- 4 Reshaping bus services with improved services and electric buses;
- 5 Linked traffic signals and new crossings to slow traffic and facilitate walking and cycling.

1 *Green Travel Planning for workplaces and residential areas* to:

- Inform people about existing alternatives to car use;
- Identify the barriers to using the alternatives;
- Develop improvements to bus services based on responses;
- Better integrate rail and bus services;
- Identify places for new cycle and walking routes;
- Pilot bike and e-bike deliveries from local shops;
- Implement the improvements, monitor and modify when needed.

2 A weight limit on through-traffic of heavy lorries (HGVs) across the Peak District National Park – this would force drivers to use the motorway box M1/M62/M60/M6/A50 around the area, significantly reduce traffic queues and free up road space for active travel. Reducing the numbers of lorries is extremely popular locally, and would require cooperation across a number of local highway authorities and enforcement of the weight restriction. Local businesses and local deliveries would not be affected. Such control schemes are feasible with Automatic Number Plate Recognition (ANPR), as in the London low emissions zone covering the whole metropolitan area and applicable to all lorries of 3.5 tonnes and over.

The control system could remove the heaviest HGVs which make up 90% of the through traffic or be set to remove all HGVs (over 7.5 tonnes). It would:

- Reduce the environmental damage and external costs (those met by public spending rather than by the operator of the vehicles): the largest HGVs are extremely damaging and cause much more noise, vibration, emissions and particulates than other vehicles. The most extreme example is damage to the road surface – the heaviest vehicles cause 180,000 times more damage than a car. Motorways are designed to minimise such external costs;
- Encourage streamlining of goods transport. Diversion of HGVs to longer routes would increase the costs of the current model used by operators. This would encourage more efficient use of vehicles, for example, minimising journeys of empty or partially empty vehicles (currently HGVs are empty for 28% of their travel).

3 Returning streets to the people – this would include slower speeds such as 20mph to make streets safe and pleasant, more space and facilities for cycling and walking with more protected road crossing points, and creation of a coherent local network for local walking and longer cycling journeys to work, school, shops, leisure, medical centres with links to Greater Manchester's Bee Network. A local group has begun the work with a focus on travel to school. E-cargo bikes would allow people to shop on-line or walk to and from the shops, and leave delivery to the e-bikes.

The public realm should be attractive and comfortable to use. Planters, benches, signalling and road surfacing would indicate that the space is shared, not for motor vehicles only (or even principally), and encourage more considerate driving.

4 Reshaping bus services – To provide integrated (bus and rail services), affordable, reliable and frequent services that meet people's needs and have priority on the road. Modern bus priority doesn't need continuous lanes – smart linked signals and bus gates achieve more for less. The package includes:

- The purchase and operation of 3 electric buses (comfortable, clean, air conditioned and with WiFi) which could be used to provide new services, for example the reintroduction of the X57 Glossop to Sheffield;
- A new service for Tintwistle, Hadfield and Glossop;
- Changes to the Woolley Bridge junction to provide a bus and cycle lane and priority entry;
- Bus gates at some pedestrian crossings to improve bus journey times;
- Introduction of incentives to tempt people out of cars and onto public transport.

5 Linked traffic signal controls – Along the trunk route and at M67 J4 modernising and introducing linked controls would improve safety, allow for bus priority without disturbing other traffic, break up queues and smooth the flow overall.

What would *Low Carbon Travel* cost?

The total costs would be £9.7million as listed below. No additional costs are given for signalisation of the M67 J4 roundabout. These would be modest if undertaken within the existing layout, but in the order of £5million if more construction work was needed.

Woolley Lane junction signalisation and provision of bus/cycle priority entry	£1,000,000
Three new signalised pedestrian crossings	£450,000
One new pedestrian crossing with bus gate	£250,000
One bus gate at existing crossing	£150,000
Two additional pedestrian phases at existing signals	£150,000
Three new electric buses	£1,000,000
Travel planning initial survey and planning	£500,000
Travel planning start up incentives 3 years @ £350k	£1,050,000
Walking route improvements (50 kms @ £5k)	£250,000
Cycling improvements (includes 50 kms plus parking and other incentives)	£500,000
20 mph speed limit plus public realm (20 kms @ £10k)	£200,000
HGV signs including advance warning on motorways	£1,200,000
Total	£6,700,000
Plus Optimism Bias 44% (a standard adjustment for underestimating costs)	£9,650,000

Would *Low Carbon Travel* provide good value for money?

Transport schemes must give value for money. For every £1 of public money spent, a scheme must provide more than £1 in the value of benefits i.e. a positive benefit cost ratio (BCR). At a cost of £181million, the A57 Link Roads has a BCR of 1.45 and is in the Government's 'low value for money' category. Our package has a BCR of 4.99, making it 'very high value for money'.

Low Carbon Travel for Longdendale and Glossopdale has been put together after talking to residents and visitors about their travel experiences and hearing their ideas for improvements. All of these ideas are currently in use – but not yet in this locality. Other measures such as a **local affordable EV car and e-bike share/hire scheme** would give people the flexibility of having access to an EV car or bike and allow them to do their bit to reduce climate emissions, without breaking the bank. If you would like to support these proposals you can sign the petition to the Secretary of State [REDACTED].

For more details please contact [REDACTED]. The full report¹ can be found [here](#).

¹ [REDACTED] [here](#)

Submission number: 6

Date submission received by PINS: 14 October 2022

Name: CPRE PDSY



The countryside charity
Peak District and
South Yorkshire

37 Stafford Road
Sheffield S2 2SF

Tel: [REDACTED]

A57 Link Roads Case Team
National Infrastructure Planning
Email: a57linkroads@planninginspectorate.gov.uk

13th October 2022

Dear Secretary of State

A57 LINK ROADS DETERMINATION - SECRETARY OF STATE'S REQUEST FOR COMMENTS FROM THE APPLICANT AND ALL INTERESTED PARTIES

We respond to your invitation to comment on the Applicant's response to your questions on (i) Greater Manchester's Clean Air Plan, (ii) licensing of work on bats and (iii) status of Greater Manchester's Joint Development Plan Places for Everyone.

(i) Greater Manchester's (GM) Clean Air Plan

We agree with the Applicant regarding the current position of GM's emerging Clean Air Plan. However, we disagree with the Applicant's claims that its assessment of the air quality in the Environmental Statement '*can be considered to be a worse case scenario as it does not account for expected improvements in road traffic emission either from a charging Clean Air Zone or via non-charging measures.*'

As we demonstrated throughout the Examination the assessment of air quality by the Applicant is compromised by the enormity of the problems with the traffic modelling. These are summarised in a letter from ten Interested Parties [REP10-017, pp 1-6]. With respect to air quality assessment the traffic model was refined to alter the distribution of traffic within Glossop, and through Tintwistle [REP2-090 pdf page 519-521/790, paras 7.3.1 and 7.3.2, Figure 7-1]. This refinement was made specifically to avoid air pollution effects of the scheme that could '*jeopardise the application for development consent. Changes in traffic flow and speed as a result of the scheme were predicted to cause exceedances of the AQ strategy objectives for annual mean nitrogen dioxide (NO2).*' The three locations where air pollution could jeopardise

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future

[REDACTED]
Registered Charity No.1094975 Registered Company No. 4496754



development consent are within the Tintwistle AQMA, within in the Dinting Vale AQMA and on Glossop High Street West (REP2-090 pdf page 521/790, Figure7-1). The refinement led to these three locations no longer meeting the threshold for air quality assessment. The impact of the scheme on both AQMAs was not presented and there were no modelled receptors on High Street West¹. The local authority responsible for addressing air pollution, High Peak Borough Council, was still questioning the traffic model results with respect to air quality assessment at the end of the examination. Until there is confidence in the traffic modelling all its outputs are questionable, and the worst effects of the scheme are unknown/uncertain. The Secretary of State (SoS) can neither reach a reasoned conclusion on the significant effects of the proposed development on the environment under Regulation 21 of the 2017 Regulations (the EIA Regulations) nor fulfil the legal requirement to weight the adverse impacts of the scheme against its benefits (Planning Act 2008, s.104 (7)).

The traffic modelling and its application should be subject to independent assessment. Full technical dialogue with the assessors and all interested parties should be established to the satisfaction of all and in line with professional Codes of Conduct. Only full challenge and scrutiny of the model will enable all parties to have confidence that the model outputs are robust.

(ii) Licence for bat work

In response to the SoS's request for an update regarding protected species' licences, the Applicant responded that bat surveys are ongoing with an anticipated completion date of October 2022. Once completed, the licence application will be finalised and submitted to Natural England's Wildlife Team. We welcome the use of the most recent survey results to inform the licence application. However, we have these concerns: first, the latest research, described below, shows that the proposed bat hops do not provide effective mitigation to reduce bat vehicle collision, and therefore Natural England is not in a position to provide a mitigation licence; second, for the SoS to reach a reasoned conclusion on the significant effects of the proposed development on the environment under Regulation 21 of the 2017 Regulations (the EIA Regulations), there must be no remaining impediment to a mitigation licence.

¹ ES Figure 5.2(i) Sheet 2

President: Dame Fiona Reynolds



The impacts of the A57 Link Roads on bats include direct and permanent habitat loss; severance and fragmentation of 11 flight paths used by foraging/commuting bats; increased visual (including light pollution) and noise disturbance; and mortality through traffic collisions, or an alteration to commuting routes which may expose bats to different risks that would normally be avoided.

The proposed mitigation measures to address mortality from traffic include bat hop overs. There is no evidence for the efficacy of bat hops. In 2017 Berthinussen and Altringham concluded² that further research is needed to make detailed recommendations. Based on currently available evidence the best way to maintain safe bat commuting routes and increase the permeability of linear transport infrastructure is a combination of appropriately designed underpasses (if they are sufficient size and placed along pre-construction commuting routes) and green bridges. Wire bridges/gantries are unlikely to be effective since no design tested so far has shown any promise and they meet none of the essential ecological or behavioural needs of bats.

According to our review of 26 five-year Post-Opening Project Evaluations of National Highways' schemes, National Highways appears to have failed to monitor the majority of the bat mitigation schemes that it implemented up to 2017, and so is unable to provide any useful data. That this situation appears to be continuing up to the present day was confirmed during the 2021 Examination into the A47 Blofield to North Burlingham scheme (TR010040), when the Applicant revealed it was undertaking a pilot study of bat hops:

'I asked the Applicant [PD-006] whether all potential options (had) been explored to mitigate the moderate adverse and thus significant effect on bats. I was satisfied with the Applicant's response [REP1-061], though sought some further clarification at ISH2 [EV-023 to EV-029] on the potential effectiveness of the proposed bat hops and the timeframe for results of a National Highways pilot scheme, which had been agreed with NE, to use raised netting to encourage a higher flight path for bats to cross roads. The Applicant responded [REP4-051] stating that the pilot scheme was ongoing and was unlikely to be completed before the close of the Examination and

² Bats and linear infrastructure A summary of DEFRA research project WC1060 by Dr Anna Berthinussen and Professor John Altringham for Natural Resources Wales, 2017

President: Dame Fiona Reynolds



The countryside charity
Peak District and
South Yorkshire

that the effectiveness of the bat hops was uncertain as such mitigation had not been monitored on other schemes. [Examining Authority's report, March 2022, 4.12.24]

We agree that results from a single scheme are inconclusive as to the efficacy of the bat hops. Thus, the 2017 work by Berthinussen and Altringham appears to be the most up-to-date evidence. The bat hops proposed for the A57 Link Roads should therefore be replaced by green bridges. Natural England cannot give a licence for mitigation measures for work on bats when one of the mitigation measures is known to be ineffective.

(iii) Status of GMCA's Joint Development Plan

The Applicant refers to Tameside Council's (TMBC) response on this matter during the Examination [REP6-037]. TMBC considered 'only very limited weight' can be given to policies in the plan as representations have been received objecting to policies within it on both detailed and strategic matters. Greater Manchester Combined Authority (GMCA) in its response to this question concurs with TMBC.

We disagree. GMCA's Joint Development Plan should be a material consideration when determining the A57 Link Roads, as we argued in our written representation [REP2-069, pp20-21]. We now develop those arguments.

In assessing the weight to be given to the Joint Development Plan, TMBC referred to NPPF 2021 paragraph 48. However, the answer to the question 'what weight can be given to the Joint Plan' is not clear cut in this instance. The substantive issue is what is important about the Joint Development Plan for the SoS's determination of the A57 Link Roads. In this case there are two issues - (1) GMCA's transport planning policies and (2) major development in the vicinity of the scheme.

(1) GMCA's Transport Strategy 2040 and accompanying documents contain its transport planning policies and support its Joint Development Plan. The Strategy is based on repeated public consultation and full endorsement by all 10 constituents of the Combined Authority. The Strategy was published in 2017 and has been subject to review. The 2021 version now includes the Right Mix '50:50' policy, which aims for 50% of journeys to be made by active travel and public transport by 2040, with a 17% reduction in car trips overall - a decrease in car trips of 6% for local neighbourhood

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future

Registered Charity No.1094975 Registered Company No. 4496754



journeys, 12% for the wider city region, 21% for trips connected to the regional centre and 7% for city-to-city journeys. These policies are required to meet GMCA's Net Zero carbon target by 2038. Before inclusion in the Strategy, the Right Mix policy underwent public consultation in January 2019.

In addition, there was public consultation on the five-year Delivery Plan. The long-term approach to planning the transport network, set out in the 2040 Transport Strategy, is underpinned by a series of five-year Delivery Plans. The first Delivery Plan (2016-2017 to 2021-2022) was published in 2017, alongside the 2040 Transport Strategy. An updated, draft Delivery Plan was published for public consultation, alongside the first version of GMCA's Spatial Framework, in January 2019. A final version of this document now accompanies the second version of the Spatial Framework - the Joint Development Plan.

Key to development of the transport planning documents is that they have the support of all 10 local authorities, unlike the Joint Development Plan from which Stockport MBC withdrew. In addition:

- The Right Mix policy is aligned with DfT's Decarbonising Transport goal for 50% of urban trips to be made by active travel by 2030.
- Both the Joint Development Plan strategic policies for transport and the Transport Strategy are consistent with NPPF 2021. GMCA is shaping places in ways that contribute to '*radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience*' (NPPF 2021, 152).
- GMCA's Regulation 22 Summaries of Thematic Main Issues assess the responses received during the publication period in respect of each draft Joint Development Plan policy. There is no evidence that issues regarding the transport policies (which reflect the 2040 Transport Strategy) are unresolvable, nor do they appear that significant, nor has GMCA proposed any changes to the Joint Development Plan in response to them.

Thus, having been through robust consultation exercises and now undergoing delivery, GMCA's transport planning policies are a material consideration for determination of the A57 Link Roads. They were also a material consideration when National Highways chose to ignore them for the statutory consultation of the scheme in Nov-Dec 2020 and in the DCO application. Neither GMCA's Right Mix policy nor DfT's goal for 50% of

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future



The countryside charity
Peak District and
South Yorkshire

urban trips to be made by active travel were reflected in the A57 Link Roads' assessment and modelling. These omissions must be rectified before the SoS can fulfil the legal requirement of the Planning Act 2008, s.104 to make the planning balance between the adverse impacts of the scheme and its benefits.

(2) The single major development in the vicinity of the scheme is the proposed Godley Green Garden Village (GGGV). It was submitted as an outline planning application 21/01171/OUT in Sept 2021 and is being considered by TMBC. It is due to have a further public consultation later this year as new information has come forward. It is allocation JPA-31 in the Joint Development Plan and was GM allocation 43 in the preceding 2019 draft Spatial Framework. However, National Highways chose to exclude the proposed development from the cumulative assessment of scheme impacts with local developments; this despite evidence available at the time of the 2020 statutory consultation that GGGV would have significant material impacts on the Strategic Road Network (SRN) which would require mitigation. As we showed in our final submission [REP12-031, 10.20] National Highways failed to properly assess the impact of the proposed GGGV on the SRN. The importance of this failure is emphasised by National Highways response to TMBC's planning application: it has twice submitted a formal recommendation that planning permission should not be granted, as it does not have confidence that there would not be a severe impact on the SRN, should planning permission be granted. The most recent of these recommendations ends on October 28th 2022. If the GGGV does not proceed its adverse impacts would not be imposed on the SRN. However, if it does proceed we do not know the worst case scenario for the scheme's cumulative impacts. Therefore, a full assessment of the cumulative impacts of the scheme with GGGV must be made before the SoS can fulfil the legal requirement of the Planning Act 2008, s.104 to make the planning balance between the adverse impacts of the scheme and its benefits.

In conclusion, the supporting transport documents to GMCA's Joint Development Plan are a significant material consideration in the determination of the A57 Link Roads and their policies should have been included in the assessment of the scheme. The proposed GGGV should have been fully considered in the assessment of the cumulative impacts of the scheme. Until these omissions are addressed and the worst

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future

Registered Charity No.1094975 Registered Company No. 4496754



The countryside charity
Peak District and
South Yorkshire

case scenario for the scheme's impacts are explicit, the SoS cannot fulfil the legal requirement of the Planning Act 2008, s.104 to assess the planning balance.

Yours sincerely,



Anne Robinson
Campaigner

Unique Reference 20029243

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire

for the countryside, for communities, for the future



Registered Charity No.1094975 Registered Company No. 4496754

Submission number: 7

Date submission received by PINS: 19 October 2022

Name: CPRE PDSY



The countryside charity
Peak District and
South Yorkshire

37 Stafford Road
Sheffield S2 2SF

Rt Hon Anne-Marie Trevelyan MP
Secretary of State for Transport

Tel: (0114) 312 2002
[REDACTED]

Email: [REDACTED]

19th October 2022

Dear Secretary of State

Scrapping unnecessary expenditure on road building

The Chancellor of the Exchequer has asked all Government departments to make cuts to public expenditure. One area of expenditure where your department could make savings would be the Roads Investment Strategy 2 (RIS2) which costs £23bn. Such an approach would be in line with the Climate Change Committee, which has repeatedly raised concerns about the Government's roads programme, and with the National Infrastructure Commission's recommendation to move away from road building and towards asset maintenance and renewal.

More than half of RIS2 spending is on new roads, some of which have been in development for many years, and all of which would increase carbon emissions and undermine the UK's legally binding commitment to Net Zero GHG emissions. Road schemes waste investment in walking cycling and public transport by encouraging car dependency. The evidence that they stimulate economic growth is extremely weak, and in the current circumstances this makes them unnecessary.

The A57 Link Roads, on which you are shortly to make a decision, demonstrates these adverse impacts and more. It would increase traffic, worsen congestion, and increase road crashes in the wider area. National Highways as proponents of the scheme have not followed Treasury Green Book rules and have developed the Link Roads in isolation from the strategic programme planned for the South Pennines corridor, of which they are a part. As the first link in corridor-wide dualling they would commit Government to further costs of £8-10 billion.

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future

[REDACTED]
Registered Charity No.1094975 Registered Company No. 4496754



The countryside charity
Peak District and
South Yorkshire

We have developed an effective and cheaper alternative proposal, '*Low Carbon Travel for Longdendale and Glossopdale*' (summary attached - cost £10 million as opposed to £181 million), which would bring all the benefits of the scheme to a much wider area but with none of its disbenefits. In the initial assessment this alternative scored as well as the scheme in meeting objectives and solving problems. We urge you to implement a trial of this alternative as an interim measure. If it is effective, it would avoid a hugely destructive and harmful road project which would merely fuel demand for the next bit of tarmac across the Peak District National Park - and save public expenditure.

We would respectfully ask for a direct reply from your office, and for it not be forwarded to any other department for a response. Many thanks.

Yours sincerely,



Anne Robinson
Campaigner

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future



Registered Charity No.1094975 Registered Company No. 4496754

LOW CARBON TRAVEL FOR LONGDENDALE AND GLOSSOPDALE

CPRE Peak District
and South Yorkshire

September 2022

Summary of full report
by Keith Buchan, MTRU

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future

Registered Charity No.1094975
Registered Company No. 4496754



LOW CARBON TRAVEL FOR LONGDENDALE AND GLOSSOPDALE

What's the problem?

The Longdendale villages of Tintwistle, Hollingworth and Mottram beside the A57/A628 trunk route experience severe environmental pollution from through-traffic of heavy lorries and commuter car traffic from Glossopdale. Travel in the area generates:

- High carbon emissions from traffic. Once released carbon emissions remain in the atmosphere for about 100 years. To have any chance of meeting carbon reduction targets, emissions need to be cut as soon as possible;
- Noise, air pollution and severance created by heavy traffic on residential roads;
- Noise, air pollution, severance and landscape impacts from the same traffic in the Peak District National Park;
- Unreliable journey times;
- Poor local conditions for walking and cycling which inhibit active lifestyles leading to poor health;
- Delays to local buses;
- Long journey times between Manchester and Sheffield.

Although the proposed A57 Link Roads (dual carriageway bypass of Mottram, single carriageway link to Glossop) would reduce traffic and its associated air pollution on Hyde Road in Mottram and Woolley Lane on the edge of Hollingworth (if traffic calming measures are effective), it would increase traffic, congestion, carbon emissions, air pollution, noise, road crashes and severance in Hollingworth, Tintwistle and Glossopdale. Its claim to alleviate unreliable long journey times is unsubstantiated. The scheme's infrastructure has profound impacts on the Green Belt, would increase traffic through the National Park and requires demolition of property. In order to avoid all these impacts CPRE the countryside charity sought a solution that would benefit everyone.

How would *Low Carbon Travel* address the problem?

A solution tailored to relieve Glossopdale and Longdendale of traffic impacts, enhance local countryside as a green lung for Greater Manchester and make door-to-door journeys by bus, foot or cycle a realistic, attractive and convenient option. CPRE's *Low Carbon Travel* includes:

- 1 Green Travel Planning for all;
- 2 Weight restriction of through traffic of heavy lorries;
- 3 Returning streets to the people;
- 4 Reshaping bus services with improved services and electric buses;
- 5 Linked traffic signals and new crossings to slow traffic and facilitate walking and cycling.

1 Green Travel Planning for workplaces and residential areas to:

- Inform people about existing alternatives to car use;
- Identify the barriers to using the alternatives;
- Develop improvements to bus services based on responses;
- Better integrate rail and bus services;
- Identify places for new cycle and walking routes;
- Pilot bike and e-bike deliveries from local shops;
- Implement the improvements, monitor and modify when needed.

2 A weight limit on through-traffic of heavy lorries (HGVs) across the Peak District National Park – this would force drivers to use the motorway box M1/M62/M60/M6/A50 around the area, significantly reduce traffic queues and free up road space for active travel. Reducing the numbers of lorries is extremely popular locally, and would require cooperation across a number of local highway authorities and enforcement of the weight restriction. Local businesses and local deliveries would not be affected. Such control schemes are feasible with Automatic Number Plate Recognition (ANPR), as in the London low emissions zone covering the whole metropolitan area and applicable to all lorries of 3.5 tonnes and over.

The control system could remove the heaviest HGVs which make up 90% of the through traffic or be set to remove all HGVs (over 7.5 tonnes). It would:

- Reduce the environmental damage and external costs (those met by public spending rather than by the operator of the vehicles): the largest HGVs are extremely damaging and cause much more noise, vibration, emissions and particulates than other vehicles. The most extreme example is damage to the road surface – the heaviest vehicles cause 180,000 times more damage than a car. Motorways are designed to minimise such external costs;
- Encourage streamlining of goods transport. Diversion of HGVs to longer routes would increase the costs of the current model used by operators. This would encourage more efficient use of vehicles, for example, minimising journeys of empty or partially empty vehicles (currently HGVs are empty for 28% of their travel).

3 Returning streets to the people – this would include slower speeds such as 20mph to make streets safe and pleasant, more space and facilities for cycling and walking with more protected road crossing points, and creation of a coherent local network for local walking and longer cycling journeys to work, school, shops, leisure, medical centres with links to Greater Manchester's Bee Network. A local group has begun the work with a focus on travel to school. E-cargo bikes would allow people to shop on-line or walk to and from the shops, and leave delivery to the e-bikes.

The public realm should be attractive and comfortable to use. Planters, benches, signalling and road surfacing would indicate that the space is shared, not for motor vehicles only (or even principally), and encourage more considerate driving.

4 Reshaping bus services – To provide integrated (bus and rail services), affordable, reliable and frequent services that meet people's needs and have priority on the road. Modern bus priority doesn't need continuous lanes – smart linked signals and bus gates achieve more for less. The package includes:

- The purchase and operation of 3 electric buses (comfortable, clean, air conditioned and with WiFi) which could be used to provide new services, for example the reintroduction of the X57 Glossop to Sheffield;
- A new service for Tintwistle, Hadfield and Glossop;
- Changes to the Woolley Bridge junction to provide a bus and cycle lane and priority entry;
- Bus gates at some pedestrian crossings to improve bus journey times;
- Introduction of incentives to tempt people out of cars and onto public transport.

5 Linked traffic signal controls – Along the trunk route and at M67 J4 modernising and introducing linked controls would improve safety, allow for bus priority without disturbing other traffic, break up queues and smooth the flow overall.

What would *Low Carbon Travel* cost?

The total costs would be £9.7million as listed below. No additional costs are given for signalisation of the M67 J4 roundabout. These would be modest if undertaken within the existing layout, but in the order of £5million if more construction work was needed.

Woolley Lane junction signalisation and provision of bus/cycle priority entry	£1,000,000
Three new signalised pedestrian crossings	£450,000
One new pedestrian crossing with bus gate	£250,000
One bus gate at existing crossing	£150,000
Two additional pedestrian phases at existing signals	£150,000
Three new electric buses	£1,000,000
Travel planning initial survey and planning	£500,000
Travel planning start up incentives 3 years @ £350k	£1,050,000
Walking route improvements (50 kms @ £5k)	£250,000
Cycling improvements (includes 50 kms plus parking and other incentives)	£500,000
20 mph speed limit plus public realm (20 kms @ £10k)	£200,000
HGV signs including advance warning on motorways	£1,200,000
Total	£6,700,000
Plus Optimism Bias 44% (a standard adjustment for underestimating costs)	£9,650,000

Would *Low Carbon Travel* provide good value for money?

Transport schemes must give value for money. For every £1 of public money spent, a scheme must provide more than £1 in the value of benefits i.e. a positive benefit cost ratio (BCR). At a cost of £181million, the A57 Link Roads has a BCR of 1.45 and is in the Government's 'low value for money' category. Our package has a BCR of 4.99, making it 'very high value for money'.

Low Carbon Travel for Longdendale and Glossopdale has been put together after talking to residents and visitors about their travel experiences and hearing their ideas for improvements. All of these ideas are currently in use – but not yet in this locality. Other measures such as a **local affordable EV car and e-bike share/hire scheme** would give people the flexibility of having access to an EV car or bike and allow them to do their bit to reduce climate emissions, without breaking the bank.

For more details please contact [REDACTED] The full report¹ can be found [here](#) .

We are most grateful to the Foundation for Integrated Transport, CPRE *the countryside charity*, CPRE North West Region and CPRE Yorkshire and Humber Region for supporting this project.

Submission number: 8

Date submission received by PINS: 23 October 2022

Name: CPRE PDSY



The countryside charity
Peak District and
South Yorkshire

Mr John Larkinson
CEO, The Office of Rail and Road (ORR)
Office of Rail and Road
25 Cabot Square
London
E14 4QZ

By email: [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
25th August 2022

Dear Mr Larkinson

National Highways non-compliance with its licence

CPRE PDSY is a branch of CPRE, the countryside charity. We believe in a thriving, beautiful countryside, rich in nature and playing a crucial role in the response to the climate emergency. Our goal is a countryside that's valued, enjoyed and understood by, and accessible to, everyone, wherever they live.

We write to bring to the ORR's attention that National Highways is non-compliant with several of its licence conditions with respect to the development of the A57 Link Roads. In the report accompanying this letter we present substantial evidence of poor behaviour which has prejudiced engagement with stakeholders and the public, and calls into question not only the integrity of the company but also veracity of the evidence for the Development Consent Order for the scheme. There is also evidence of failure to properly steward the future of this part of the Strategic Route Network, to ensure value for money, to protect and improve safety on the strategic and local road network, to co-operate with stakeholders, to conform to the principles of sustainable development and to comply with Government policy.

The non-compliance described represents not only a serious malfeasance but also demonstrates that the process through which the A57 Link Roads has passed has been both unlawful and encumbered by participatory unfairness making untenable any decision which might be made to proceed with the scheme.

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future

[REDACTED]
Registered Charity No.1094975 Registered Company No. 4496754



The countryside charity
Peak District and
South Yorkshire

This conclusion is also shared by our consultant, Keith Buchan of MTRU, a Chartered Transport Planning professional whose expertise, experience and persistence in understanding the evidence revealed much of what has been exposed. Without his engagement in the process, much would have been missed. Mr Buchan's view, which reinforces the findings of our report, was submitted as an open letter to the Examining Authority as the examination closed in May 2022. It can be read here <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010034/TR010034-001534-Keith%20Buchan%20-%20comments%20on%20submissions%20for%20Deadline%2011.pdf>

With respect to the A57 Link Roads, we urge the ORR to assess NH's performance in the light of our evidence to you and report its findings to the SoS before he makes a decision on the scheme in mid-November 2022. More generally we urge the ORR to enforce behaviour that is expected of a public body. In particular, we suggest that the ORR a) insists on, or provides, much more robust assessment and monitoring of scheme development from options appraisal through project business case, and b) reviews or instigates a review of the NSIP proposal and DCO process.

Although our report relates to an individual scheme - the A57 Link Roads - we are aware that other individuals and organisations have had similar experiences to ours with other schemes, including the Lower Thames Crossing, the A27 Arundel Bypass and the A66 Northern Trans-Pennine Project. National Highways general approach and behaviour also appears to extend beyond specific road schemes, given what was exposed through the recent national scandal of its management of the Historical Railways Estate.

We look forward to hearing from you as to how the ORR intends to address our concerns. We are copying this letter and the report to the Transport Select Committee and the Secretary of State for Transport.

Yours sincerely,



Anne Robinson
Campaigner

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future



Registered Charity No.1094975 Registered Company No. 4496754

NATIONAL HIGHWAYS NON-COMPLIANCE WITH ITS LICENCE CONDITIONS

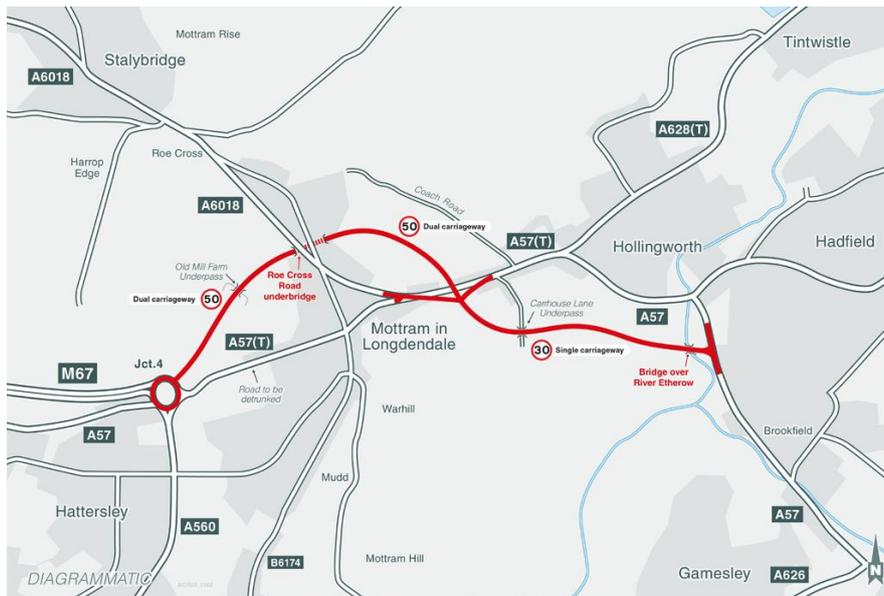
- 1 CPRE PDSY is a branch of CPRE, the countryside charity. We are also as the Friends of the Peak District, the National Park society for the Peak District National Park and a member of the Campaign for National Parks. We believe in a thriving, beautiful countryside, rich in nature and playing a crucial role in the response to the climate emergency. Our goal is a countryside that's valued, enjoyed and understood by, and accessible to, everyone, wherever they live. Through all our work we look at the role of our countryside in tackling the climate emergency, including seeking ways to increase resilience and reduce impact.
- 2 Through our engagement with Highways England/National Highways' (NH) plans for major road building impacting on the Peak District we have found that the company has not complied with several of its licence conditions, some of which are statutory directions. This relates particularly to the development and progression of its proposed A57 Link Roads¹. The non-compliance described below represents not only a serious malfeasance but also demonstrates that the process through which the A57 Link Roads has passed has been both unlawful and encumbered by participatory unfairness making any decision which might be made to proceed with the scheme untenable. As the Highways Monitor, we understand that the Office of Rail and Road (ORR) monitors National Highways' compliance with the statutory directions and regard to the guidance issued by the Secretary of State for Transport (SoS) in its licence. We are therefore bringing this non-compliance to your attention.
- 3 **With respect to the A57 Link Roads we urge the ORR to assess NH's performance in the light of this representation to you and report your findings to the SoS before they make a decision on the scheme in mid-November 2022. More generally we urge the ORR to enforce behaviour that is expected of a public body. In particular, we suggest that the ORR a) insists on, or provides, much more robust assessment and monitoring of scheme development from options appraisal through project business case, and b) reviews or instigates a review of the NSIP proposal and DCO process, for example in line with paragraph 29 below.**
- 4 The document is laid out as follows
 - (A) Background
 - (B) Behaviour unacceptable in a public body, Licence para 5.19, as demonstrated by
 - (1) Statutory consultations
 - (2) Transport Assessment Report
 - (3) NH's response to CPRE PDSY's requests for information

¹ The scheme appears in ORR's Annual Assessment of NH's Performance 2021-2022, Tables B4 and B11 <https://www.orr.gov.uk/sites/default/files/2022-07/annual-assessment-of-national-highways-performance-2022-print.pdf>

- (4) Examination of Development Consent Order (DCO) application
- (C) Failure to comply with statutory directions in the Licence, paras 4.1 management of Strategic Road Network (SRN), 4.2 general duties on Licence holder and 5.29 Government policy
- (D) Failure to have regard to guidance in the Licence, paras 5.15 and 5.23
- (E) Conclusions.

BACKGROUND

- 5 The A57 Link Roads (the scheme) developed as NH's favoured option out of the 2015 Trans-Pennine Routes Feasibility Study². It is a dual carriageway bypass of Mottram between the M67 and the A57T, continuing as single carriageway extension A57T to A57 to Glossop, which would effectively bypass part of the A57 called Woolley Lane (see figure below). National Highways (or Highways England as it was) held statutory consultations on the scheme in 2018³ and 2020⁴. (The scheme was called the Trans-Pennine Upgrade until 2020 when it became the A57 Link Roads.)



- 6 As a Nationally Significant Infrastructure Project (NSIP) the scheme's draft DCO was submitted to the Planning Inspectorate (PINS) on 28th June 2021, when all the application documents became publicly available, and was accepted for examination on 26th July 2021. The examination of the DCO application was conducted between 16th November 2021 and 16th May 2022. The Examining Authority (ExA)'s recommendations must be made by 16th August 2022 and the SoS's decision must be made by 16th November 2022.

² <https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports>

³

- 7 CPRE employed a professional transport planner, Keith Buchan of MTRU (Metropolitan Transport Research Unit), to develop our alternative proposals to the scheme for consideration through the 2015 Trans-Pennine Routes Feasibility Study and to give evidence to the Examination-in-Public (EiP)⁵. MTRU's engagement in the EiP led to consistent and expert challenge by a professional transport planner with extensive experience.
- 8 As a branch of CPRE we have had a 50 year history of engagement with the scheme in all its iterations. The evidence we present here is focused on our engagement with development of the scheme over the last 8 years; a comprehensive assessment of both the 2018⁶ and 2020⁷ statutory consultations which was submitted to the PINS as evidence of the inadequacy of the consultations; and full engagement as an Interested Party (IP) at the EiP into the scheme. We objected to the scheme on the basis that sustainable alternatives exist that should be trialled before unsustainable road building is pursued. We are not here concerned about the scheme and its impacts except in so far as they demonstrate non-compliance by NH.
- 9 All the DCO documents for the scheme appear on the PINS website⁸. References beginning REP, EV, APP, AoC or AS refer to documents in the EiP library. The library lists all documents accepted into the EiP and provides links to each one. See footnote for link to the Library⁹.

Framework for assessment of NH's performance

- 10 The expectations of NH run higher than the conditions of its licence. They are spelt out in the Foreword to the licence by the Minister for Transport at the time: *'Government remains responsible for strategic roads and Ministers will continue to be accountable for making sure that the network is managed responsibly, in a way that safeguards value for public investment, meeting the needs of road users, securing individual well-being and*

⁵ Our alternative package comprised exclusion of through-traffic of HGVs through the Peak District National Park, including on the A57/A628/A616T with sustainable transport measures.

⁶ <https://infrastructure.planninginspectorate.gov.uk/projects/north-west/a57-link-roads-previously-known-as-trans-pennine-upgrade-programme/?ipcsection=advice&ipcadvise=73c2ad0ecc>

⁷ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-Advice-00007-1-A57-Link-Roads-Email_Redacted.pdf On 24th May 2021 we submitted additional information to PINS about the inadequacy of the consultation which appears to have been removed from the PINS website but a summary can be found in REP2-069 Appendix B.

⁸ <https://infrastructure.planninginspectorate.gov.uk/projects/north-west/a57-link-roads-previously-known-as-trans-pennine-upgrade-programme/?ipcsection=docs>

⁹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-000603-A57%20Link%20Road%20Examination%20Library%20Published.pdf>

supporting economic purpose, both today and for future generations... This document represents a crucial part of that system, by setting out the Secretary of State's statutory directions and guidance to Highways England. It makes clear, to both Highways England and the wider community of road users and stakeholders, what we expect Highways England to achieve and how they must behave in discharging their duties and in delivering our vision and plans for the network, set out in the Road Investment Strategy.

- 11 *The Licence emphasises that the role of Highways England is about more than just complying with the letter of the law. We expect the company to go the extra mile in the way it engages with road users and collaborates with other organisations to develop shared solutions. And they must take a lead in promoting and improving the role and performance of roads in respect of broader communal responsibilities, such as the aesthetics of design, safety and the environment, as well as driving forward wider progress on technology and innovation.'*
- 12 In addition the baseline standard of the Seven Principles of Public Life (the Nolan Principles) applies to anyone who works as a public officeholder, including all people appointed to work in non-departmental public bodies, such as NH¹⁰. Five of the seven principles are key to our assessment. These are:
- Objectivity - Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
 - Accountability - Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
 - Openness - Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
 - Honesty - Holders of public office should be truthful.
 - Leadership - Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.
- 13 It is within this context that we have assessed NH's performance, under the headings (B) Behaviour Unacceptable in a Public Body, (C) Failure to Comply with Statutory Directions in the Licence, and (D) Failure to Have Due Regard to Guidance in the Licence.

¹⁰ <https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-of-public-life--2>

(B) BEHAVIOUR UNACCEPTABLE IN A PUBLIC BODY

- 14 We start with the licence condition that applies to NH's interface with the public. Although para 5.19 is not a statutory direction, it should be a golden thread through all NH's interactions with organisations and the public, and we quote it below for reference.

Licence Para 5.19 In complying with 5.17 and 5.18, the Licence holder should co-operate with other persons or organisations in a way which is demonstrably:

- (a) Open and transparent – involving relevant stakeholders, ensuring that essential information is available to affected and interested parties, and that the processes for engagement and communication are clear;**
- (b) Positive and responsive – seek to build trusting and effective working relationships with key partners and stakeholders, engaging with due efficiency and economy and in a timely manner;**
- (c) Collaborative – working with others to align national and local plans and investments, balance national and local needs and support better end-to-end journeys for road users.**

- 15 We show below, through (1) the statutory consultations; (2) the Transport Assessment Report; (3) NH's response to CPRE's requests; and (4) the EiP, how NH omitted critical evidence that was crucial to understanding the scheme's impacts, presented biased evidence, misrepresented evidence, refused to share information, was reluctant to give straight answers to questions and failed to follow best practice.

(1) The statutory consultations

- 16 Through both statutory consultations NH withheld and refused to share essential information. There was insufficient information to allow the public to make an informed assessment of the impacts of the scheme. Some of the statements were misleading and bordered on the dishonest. NH steered the consultations away from over-arching fundamental questions, such as the need for the scheme and possible alternatives, towards detailed matters of design.

2018 statutory consultation

- 17 No transport assessment or traffic modelling results and little information as to the impacts of the scheme on the environment or the community¹¹ were made available during this first statutory consultation. As a result High Peak Borough Council,

¹¹ We brought this to the attention of the Planning Inspectorate and relevant local authorities by letter dated 11th March 2018.

Derbyshire County Council and the Peak District National Park Authority all submitted holding objections.

- 18 In view of these omissions, we asked Highways England if it would make traffic data available for the next consultation. It promised to do so¹² but the promise was never honoured.

2020 statutory consultation

- 19 The second 2020 statutory consultation was held during a complete lockdown for the Covid pandemic. NH claimed to have mitigated the effect of the restrictions but comparison of the 2018 and 2020 consultations revealed the only ‘mitigation’ was the addition of 3 non-interactive webinars. These provided wholly inadequate replacements for face-to-face events. In addition, people were expected to view hard copies of the documents in three cramped local post offices (as local authority offices were closed) or to view the documents on line.
- 20 A DCO applicant has a duty to consult the community in accordance with the Statement of Community Consultation (SoCC)¹³. The SoCC stated *‘we’re publishing ... consultation material to assist well-informed responses to the consultation... The report will provide information about the potential environmental effects of the scheme.’* The consultation material comprised a colour brochure delivered to the majority of households in the area, a non-technical summary and three volumes of the Preliminary Environment Information Report (PEIR). The SoCC-promised delivery of a 37-page document of FAQ to the majority of households in the area did not occur. Air pollution, noise and carbon emissions were the only impacts assessed and then only partially. The omissions and misrepresentations from the consultation were extensive and are detailed in Appendix A. They included no transport assessment, traffic data or traffic modelling; no mention of the adverse impacts on Glossopdale, on the Peak District National or on the Green Belt; a misleading impression that road safety would improve; and a brochure which focused to the exclusion of all else on the immediate benefits to residents of Mottram and on Woolley Lane – a sales pitch for the scheme, not an honest presentation of its effects.
- 21 Just as with the preceding statutory consultation in 2018, in the 2020 statutory consultation neither the public nor the statutory consultees had the information available to them to make informed responses. Once again Derbyshire County Council,

¹² Email to CPRE PDSY 23rd March 2020 *‘Thank you for your email dated 19 February 2020 regarding the article about the Trans Pennine Upgrade in the Manchester Evening News.... I can confirm that we will honour our promise to present the plans and results of the air quality, noise and traffic figures to the public at engagement events scheduled for later this year, prior to a DCO application’.* Ryan Rawson, Regional Investment Programme (RIP) North Assistant Project Manager

¹³ Planning Act 2008 s 47

High Peak Borough Council and the Peak District National Park Authority all submitted holding objections based on lack of information in the PEIR and the absence of any traffic modelling or transport assessment.

- 22 The degree to which the impacts of the scheme were withheld from the public through the consultation only became apparent through the scrutiny allowed by the EiP. These impacts included (i) increased traffic impacts and congestion causing rat running on residential streets (counter-productive to the adoption of active travel measures), poorer urban environment and increased risk of road crashes, all within Glossopdale; (ii) increased risk of road crashes on both the SRN and the local road network, particularly the A57 Snake Pass; (iii) severe adverse impacts on the Green Belt; (iv) increased traffic on cross-National Park roads. None of these are mentioned in any of the consultation documents. The brochure delivered to everyone's home concealed information that would have a huge impact on people's well-being. The statements on road safety in the FAQ were in total contradiction to the results presented with the DCO application and bordered on the dishonest. The concealment alone is sufficient to make the consultation on the scheme invalid, and to call into question the validity of the claimed support for the scheme, not to mention NH's integrity.
- 23 The statutory consultations are the only means available to the public to gain an informed impression of the scheme and its impacts. PINS regards them as the best time to influence a project whatever one's opinion¹⁴. The next step, the DCO application, is daunting, technical, requires huge amounts of time to read thousands of pages of evidence, and total commitment to keep up with weekly deadlines, answering questions from the Examining Authority (ExA), rebutting evidence and scanning revised versions of NH's original documents. It therefore excludes the majority of the public who do not have the resources or perseverance to engage.
- 24 NH is required to produce a Consultation Report to show how it met its legal duties with respect to consultation and took account of the comments made. The Consultation Report is therefore an important document. Best practice¹⁵ advice is for those making a DCO application to make it available before the application is submitted to PINS. NH refused to do this when we asked¹⁶ and only submitted it with the DCO application. It therefore failed to follow best practice. Seeing the comments made and NH's response to them would have helped the public prepare for the DCO process.

¹⁴ <https://infrastructure.planninginspectorate.gov.uk/application-process/the-process/>

¹⁵ Planning Act 2008: Guidance on the Preapplication Planning Process, 2015, para 81
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418009/150326_Pre-Application_Guidance.pdf

¹⁶ Email from CPRE to NH 17 May 2021 asking if the consultation report will be available before the DCO application is made, as good practice advises. Email from NH to CPRE 25 May 2022 advising that full consultation report will be published when DCO application is submitted

- 25 Once the DCO application is submitted, all the local authorities are invited to submit adequacy of consultation reports to PINS. Although all responded that NH had held the consultation according to the SoCC, Derbyshire County and High Peak Borough Councils (AoC-003) and the Peak District National Park Authority (AoC-004) drew attention to multiple flaws in the consultation; and reported that insufficient information was published with the consultation to enable them and the local community to determine the likely impacts of the scheme. The Councils also reported that they had *'received multiple letters from residents which raised similar concerns'*.
- 26 In summary, both consultations were a travesty of what a consultation should be. Under its licence NH is bound to follow the Cabinet Office guidance on consultation. The current version of this, issued in 2018, encourages those preparing consultations to *'give enough information to ensure that those consulted understand the issues and can give informed responses'*. The Gunning Principles for consultation¹⁷ require *'There is sufficient information to give 'intelligent consideration' - The information contained in a consultation document should not be as inaccurate or incomplete as to mislead potential consultees in their responses.'* The Aarhus Convention guarantees the right of access to environmental information held by or for public authorities, subject to limited conditions.
- 27 We have shown above that the consultation did not follow best practice according to any of these principles or guidance. It was not conducted in an open and transparent way. The limited amount of information available was so selective it was biased to the point of being dishonest, and would likely be prejudicial to a party affected by the decision. No-one could have made an intelligent consideration of, or submitted an informed response about, the scheme's impacts.
- 28 It appears contrary to good practice to have received holding objections from the statutory consultees in response to the 2018 consultation, and not addressed those concerns before holding another statutory consultation. An effective approach would have been to address all the statutory consultees' concerns and to then seek public views before proceeding to a DCO application. Development of a NSIP should be front loaded with a WebTAG compliant transport appraisal and full environmental impact assessment available for public scrutiny before the formal DCO process is entered. This was not done.

¹⁷ <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>
Supreme Court in *R (Moseley) v Haringey London Borough Council* [2014] 1 WLR 3947

(2) Transport Assessment Report (APP-059)

- 29 The failure to supply full information about the transport impacts, the traffic modelling and traffic data continued into the DCO application. A full WebTAG compliant appraisal, essential to understanding the impacts of the scheme, was not presented as part of the DCO application, as required by National Policy Statement National Networks 2014 (NPSNN) 5.207. The Transport Assessment Report (TAR) accompanying the DCO application did not allow full comprehension of the traffic effects of the scheme or provide sufficient evidence to test the impacts of the scheme against legal, policy and guidance requirements.
- 30 The withdrawn but de facto guidance states that *'a TA is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel¹⁸'*. Current Government Guidance¹⁹ for planning states *'Transport Assessments are thorough assessments of the transport implications of development'*, and *'care should be taken to establish the full range of studies that will be required of development at the earliest opportunity as it is unlikely that a Transport Assessment or Statement in itself could fulfil the specific role required of a transport element of an Environmental Impact Assessment where this is required'* as in this scheme (our emphasis).
- 31 Despite all this guidance NH reduced the main purpose of the TAR as *'to summarise the development of the Scheme in a single, stand-alone report for general consumption.²⁰'* The omissions and flaws detailed in Appendix B show how far the TAR fell short of presenting a report for general consumption, never mind a 'thorough', 'comprehensive and systematic' assessment of the transport implications of the scheme. No details were given of the traffic modelling and the results showed numerous inconsistencies, still unexplained at the end of the EiP. In three and a half pages it named the modelling software and used three figures to show the modelled area and local zone disaggregation. There was no local model validation report, no forecasting report, no options report, no strategic case report, no economic case report, no appraisal summary. The impact of increased traffic within Glossopdale was barely addressed - the increased risk of road crashes on residential roads, severance of pedestrians, the impact of HGVs, longer travel times were not mentioned or addressed. Journey time savings were limited to parts of journeys, not actual journeys the travelling public would make. There was no assessment of the impact on buses.

¹⁸ Guidance on Transport Assessment, DfT & DCLG, 2007, para 1.2

¹⁹ <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>

²⁰ TAR 1.6.3

- 32 We challenged NH on the quality of the TAR when the DCO documents were submitted but did not receive a reply until well into the EiP. It was defensive and dismissive²¹: *'It is not normal practice to submit all the detailed information relating to the traffic and economic analysis and modelling of a scheme due to the complexity and sheer volume of the data that underpins it, which cannot generally be understood and interpreted by interested parties, unless they are specialists in the fields of traffic modelling and economic analysis²².'*
- 33 Notwithstanding that NH knew there would be, and was, at least one transport professional (MTRU) engaged in the EiP, this was obstructive and counter to understanding the scheme's impacts. Others also challenged the quality of the TAR to which NH responded²³: *'The Transport Assessment Report (TAR) (APP-185) was prepared in accordance with industry standard best practice which is based on previous Department of Transport (DfT) guidance on the preparation of transport assessment that was withdrawn several years ago and not subsequently replaced by alternative guidance. Therefore, currently there is no guidance regarding the preparation of transport assessments for transport schemes'*. Due to the poor assessment we and other IPs appealed to the ExA [REP10-017] that NH should produce a Web-TAG compliant transport appraisal that addressed our concerns. The ExA did not respond to our request. NH did respond [AS-011] as a late submission to the penultimate deadline, reasserting arguments previously made.
- 34 In summary, the TAR contained highly selective information designed to promote the scheme and conceal the serious adverse impacts it would impose. NH failed to meet the minimum standard set by Government for TARs as a 'comprehensive and systematic' assessment of the transport implications of development, let alone go the extra mile required by its licence. NH has no excuse for producing such a poor assessment.
- 35 The lack of transparency regarding the information and data about the traffic modelling is most serious. It limits the public's involvement in the EIA process, which is important, not just to ensure compliance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regs'), which seek to ensure a process by which the public is given an opportunity to express their opinion on environmental matters, but also with the Aarhus Convention in respect of public participation. The public can only participate and give a reasonable opinion on environmental matters if sufficient background data on projected environmental effects is provided. It also undermines the process through which the SoS will seek to ensure that he is satisfied that the material

²¹ REP7-025, 9.69.5

²² REP5-021 page 13

²³ REP7-026, 9.70.33

provided by NH is sufficient for him to reach a reasoned conclusion on the significant effects of the proposed development on the environment.

(3) NH response to CPRE PDSY's requests for information

36 On our behalf Keith Buchan of MTRU began asking for background data on the transport appraisal and traffic modelling in March 2021 in order to inform the development of our alternative proposal and to understand scheme effects. His requests received no response. NH claimed not to have received the emails, although MTRU had never experienced such difficulties with NH before. Although we were told that the failure to receive MTRU emails was being investigated, a year later we have not received any details and on occasion NH did receive emails directly from MTRU. From May 2021 CPRE forwarded all emails from MTRU to NH. We have dealt with our experience during the pre-EiP period, through four key documents supplied to us and during the EiP.

i. Pre-examination

37 Listed below are our repeated requests by email for information relating to the full transport appraisal²⁴, only one of which was successful (in bold).

- 8th June 2021 we resubmitted our list of requested documents²⁵, all of which would have been available had a full WebTAG compliant appraisal been undertaken.
- 22nd Jul 2021 we asked if the sifting of options exercise²⁶ had been repeated since the 2015 Transpennine Routes Feasibility Study and for a response to 8th June email.
- **24th Aug 2021 NH confirmed 'that we have not repeated the Early Appraisal Sifting Tool (EAST) since finalising the options in 2015'.**
- 30th July having read the DCO documents we submitted questions and request for information (summarised in footnote below to show they were straightforward²⁷).

²⁴ REP12-034 which is a compilation of the emails between us and NH.

²⁵ Local Model Validation Report; TUBA outputs for vehicle kilometres and carbon (if not in above); Options Report; Strategic Case; Economic Case; Forecasting report, including use of DfT scenario approach; Assessment Summary Table.

²⁶ A57 Link Roads 6.3 Environmental Statement (ES) Chapters 1-4 Introductory Chapters Planning Inspectorate scheme reference: TR010034 Application document reference: TR010034/APP/6.3 para 3.3 Page 97 of 134

²⁷ Local model and forecasting report or data missing, other than the Transport Assessment (TA) and Appendix 2.1; WebTAG compliant appraisal not submitted but implied in TA, please submit it. Flow diagram in the TA and Appendix 2 are not clear as to their exact position on the roads to which they refer. Is there a labelling issue with Market Street in Hollingworth? Questions:

- 1 What models were used in addition to SATURN for the junctions?
- 2 What are the costs for signalling Junction 4 and what were the traffic impacts of doing this without the full scheme?
- 3 Which DIADEM elements were switched on and off?
- 4 How was walking and cycling included?
- 5 How was public transport included?
- 6 What are the forecasts or assumptions for the local modelled area for:
Public transport (today – 2025 – 2040)

- 6th August NH indicated it was dealing with our 30th July request under the terms of the Environmental Information Regulations 2004 with a due date for issuing a response of 20th August.
- 24th August NH, responding to our email 6th Aug, referred us to the transport modelling and forecasting reports submitted with the DCO. As we have shown above in para 32 there were no transport modelling and forecasting reports submitted with the DCO.
- 2nd Sept we repeated our request for information.
- 15th September 2021, MTRU made a formal complaint *'about the failure to supply basic information on a major scheme DCO: the A57 Link Roads. This has two aspects: the failure to supply the information and the way in which specific requests have not been answered or answered in an unsatisfactory manner. This has severely restricted the ability to scrutinise the justification for the scheme... Please engage with me so that my information requests can be met and my requests for clarification answered.'* To date, MTRU's formal complaint has still not been addressed.

38 NH's target to respond to emails is within a maximum of 10 working days. The only email which received a response within 10 working days was the email in which NH invoked the Environmental Information Regulations 2004 – NH failed to meet this deadline too. The blatant delay in responding was uncooperative and negative. Directing us to where information could be found, knowing full well that it was absent, breaks multiple Nolan principles. NH's approach to dealing with our requests for the full transport appraisal was in contrast to general enquiries which were dealt with in a timely fashion, including those relating to the scheme's environmental statement and road collisions which were addressed under Freedom of Information. This gave us the impression that NH had something to hide from scrutiny in the background transport work to the scheme.

39 For eight months NH were uncooperative, unhelpful and withheld information about the full transport appraisal that should have been supplied with the DCO application. Finally in the evening of Friday 12th November - one working day before formal proceedings for the EiP commenced on Tuesday 16th November - four background documents were sent to us; the Combined Modelling and Transport Appraisal Report, the Economic Appraisal Package, the Transport Forecasting Package and the Transport Modelling Package for the A57 Link Roads.

Cycling (today – 2025 – 2040)

Walking (today – 2025 – 2040)

7 Are the time savings in Figure 7.7 to the junctions at each end but not through it? Are there more details of real origin and destination pairs and zone to zone timings?

8 Do you have queue length data for key junctions?

ii) The four background documents – REP2-090

- 40 When NH shared the four technical documents they told us they would not be submitting them to the EiP *‘due to the technical depth of these documents. The Transport Assessment produces the data in layman’s terms and should be used instead²⁸’*. In the interests of openness and transparency we submitted them to the EiP at with our written representation on January 14th 2022, Deadline 2. They were accepted by the ExA and published by PINS as one combined document - REP2-090 (in which two of the documents are repeated). A number of IPs, including CPRE, referred to REP2-090 in their submissions. At first NH ignored references made to it. However, on 23rd February 2022 in response to IP submission REP3-032 drawing attention to REP2-090, NH stated²⁹:
- 41 *‘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’*.
- 42 This statement was not only misleading, it was also incorrect [REP6-032]. The full package of information accompanying the DCO application was accepted by the Planning Inspectorate on 26 July 2021. The four documents were released by NH to CPRE on 12th November 2021, nearly 4 months after the DCO application was accepted, not in advance of its submission.
- 43 Furthermore these documents are 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. The fact that the four documents were accepted by the ExA indicates they must have been considered of use to the EiP; the ExA and IPs were able to read them in the context of all the supporting information for the scheme. We found them crucial for scrutinising evidence. They emphasised the poverty of information in the TAR and how much essential evidence NH had withheld. For example:
- 44 The Transport Forecasting Package revealed that refinements were made to the model during development of the scheme in order to reduce air pollution in Tintwistle and Dinting Vale Air Quality Management Areas (AQMAs), and along Glossop High Street West³⁰. The pollution arising from the scheme would otherwise have been of such

²⁸ Draft Note of meeting between NH and CPRE, para 6, 15 December 2021

²⁹ REP5-021 page 13

³⁰ REP2-090 7.3.1 pdf page 519/790

severity that it was considered that it would jeopardise the application for development consent. These model refinement steps could have led to the anomalies in the traffic outputs described above. They could also have led to differences between 2025 'do minimum' and 'do something' modelled traffic flows through both AQMAs and along the A57 not meeting the criteria for, and therefore being excluded from, assessment of air quality³¹. They could also have led to changes in traffic flows on the A628T with the scheme not meeting the criteria for assessment under the Habitats Regulations Assessment.

- 45 The Transport Forecasting Package also revealed that the traffic model had been applied to reduce traffic flows on the A57 through Glossop and divert them onto residential roads, leading to all the consequences described in para 32 above. It revealed a diversionary route labelled 'Hadfield Alternative'. This information was not available in any of the DCO documents and was a key point of concern to IPs³².

iii) During the EiP

- 46 Once the EiP started and the ExA was taking note of proceedings NH became more responsive. We had two technical meetings with NH during the EiP on 15th December 2021 and 19th January 2022 in order to allow MTRU to ask questions, request information and increase our understanding of the transport assessment. The meetings were led by NH; direct technical dialogue with those undertaking the assessment of the scheme was not allowed. This fundamentally limited our understanding. The bulk of the requested information was supplied by 7th March [REP7-025, 9.69.61]. However the data requested on public transport was never satisfactorily resolved (see Appendix C a. below).
- 47 We initially agreed to aid the EiP and the ExA as to where we did and did not agree with NH through a Statement of Common Ground (SoCG). Due to NH's obfuscation and ignoring our requests for clarification we were unable to complete this.
- 48 In summary, NH was completely resistant to engaging with us and providing information before the EiP started. There was no good reason for withholding any of it, and it could all have been shared at the latest with the DCO application. Once the EiP started, the formal process required at least a show of cooperation but even that was hampered by NH's restrictive management of the dialogue.

³¹ Through the Tintwistle AQMA the predicted vehicle flows were 40 vehicles per day short of the threshold (an increase of 1,000 AADT) required by the guidelines. The shortfall to meet the criteria for the Habitats Regulation Assessment was 150 vehicles per day. The PDNPA in its Local Impact Report REP2-048, 8.3.12 through to its deadline 9 response REP9-035 pp 3-4 submitted a sustained judgement that the European sites adjacent to the A628T must be assessed but was ignored.

³² REP2-089; REP4-027 pp4-5; REP9-051 pp1-3; REP9-049

(4) Examination of the DCO application

49 The topics through which NH tried to conceal crucial evidence are detailed in Appendix C. They ranged from assessment of public transport; assessment and review of appraisal options; explanations of the spurious traffic data, the uncertainty log and associated development; increase in vehicle kms; a sensitivity test for carbon emissions; visibility of the scheme to the public; major nearby development Godley Green Garden Village; and the impacts of national and regional policy on public transport walking and cycling policy on the scheme. The tactics demonstrate a spectrum of behaviour from delay in producing information to the extent it was too late for the EiP to consider, trying to show due process had been followed when it had not, avoidance of answering questions and drip feeding small amounts of information, playing circular games, offering diametrically opposing answers to the same repeated question, and poor understanding of its own evidence. All this wasted EiP time and opportunities for proper scrutiny, gave rise to a lack of confidence in the work undertaken by NH and its contractors, and challenged the integrity of the environmental, social and economic assessment of the impacts of the scheme.

Summary of non-compliance with Licence para 5.19

50 Both statutory consultations misled the public as they were prejudicially biased, withheld information critical to understanding the impacts of the scheme and failed to meet basic standards of consultation. NH, when dealing with our requests for information, failed to engage in an open, transparent, responsive and collaborative way. Instead it was obstructive, only improving its behaviour once under observation from the ExA. The TAR presented with the DCO application was an exceedingly superficial assessment of the scheme from which crucial evidence was withheld. NH's approach throughout the EiP was to reduce adverse impacts to insignificance and to dismiss challenges, rather than engage in constructive dialogue. It was evasive, obstructive and defensive, and frustrated the many attempts to get substantive answers that would aid understanding of the scheme's impacts.

(C) FAILURE TO COMPLY WITH STATUTORY DIRECTIONS IN THE LICENCE

Licence Para 4.1 It must operate and manage the SRN in the public interest in respect of both current activities and needs and in providing effective stewardship of its long-term operation and integrity.

51 The process of addressing the problems along the A57/A628/A616T corridor was deeply flawed. The A57T is but one section of the strategic South Pennines Corridor between the Port of Liverpool and the Humber Ports³³. Instead of addressing the whole route the 2015 Trans-Pennine Routes Feasibility Study focused on the traffic 'hot spot' at Mottram. It excluded another strategic corridor, the M62, the traffic on which interacts

³³ South Pennines Route Strategy 2017 Highways England

with the A628T corridor. The study focused on highway matters, avoided a multimodal approach, and failed to adopt a full corridor approach. It did not therefore follow the WebTAG requirements to start with a blank sheet, consider transport problems in the round and consider all solutions including non-transport ones³⁴. This narrow approach is reflected in the South Pennines Route Strategy in which all the issues on the SRN are solved with highway interventions without due regard to modal shift to rail. The Mayor of Liverpool has expressed his dissatisfaction with this approach in his recent rejection of the A5036 Port of Liverpool dualling at the west end of the corridor³⁵.

- 52 The scheme under examination is what remains of previous, larger scale proposals (the 2007 Mottram-Hollingworth-Tintwistle bypass). The issue of piecemeal implementation disguising real strategic impacts was dealt with as far back as the 1980s and by SACTRA. Yet even now this piecemeal approach continues to east and west of the scheme within this corridor. To the east NH is exploring the feasibility of the Hollingworth-Tintwistle bypass³⁶. It is likely that the current scheme will increase traffic along the A628T through Hollingworth and Tintwistle, fuelling irresistible demands for road building to relieve the villages. The next step would then be the proposed dualling of the corridor to the M1³⁷. Any extension to the east would impact directly on the Peak District National Park and bring the test of major development in a National Park into play. By developing a small length of the corridor the big strategic impacts are avoided and resistance is reduced as each piece passes through its formal process as a standalone scheme.
- 53 In the other direction, five miles to the west along the M67, the M67/M60 J24 Denton Island interchange was excluded from the scheme's assessment. Yet the interchange has long been recognised as a pinch point for congestion³⁸ in need of improvement, and the proposed interventions are part of the Trans-Pennine Upgrade of which this scheme is a part. *'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... It is included in*

³⁴ Transport Analysis Guidance The Transport Appraisal Process, DfT, 2014
<https://webarchive.nationalarchives.gov.uk/ukgwa/20181209040649/https://www.gov.uk/government/publications/webtag-transport-appraisal-process> The more recent version published in May 2018 carries the same information
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938766/tag-transport-appraisal-process.pdf

³⁵ Liverpool City Region Mayor, letter to SoSfT re A5036

³⁶ 2020 statutory consultation FAQ; RIS2 2020-2025

³⁷ Trans-Pennine tunnel study

³⁸ South Pennines Route Strategy 2017 Highways England; South Pennines Route-Based Evidence Strategy Report, Highways England, 2014, Figure 3; South Pennines Route Strategy, Highways England, 2017 p.29

the Highways England Risk Register for the project³⁹. The A57 Link Roads would add, according to NH modelling, an extra 8,000 vehicles every weekday to the M67 in 2025 the opening year⁴⁰. Adding in traffic from the proposed nearby major development Godley Green Garden Village (see Appendix C ix) would lead to the interchange operating at above or approaching capacity⁴¹. National Highways' plans for mitigation measures at the M60 J24 interchange were not mentioned in the DCO application.

- 54 All these failings stem from a failure of those undertaking an appraisal to understand and/or have due regard for the strategic context within which a proposal sits, as identified by the Treasury's Green Book 2020 (see para 92 below). Effective stewardship of the SRN's long term operation and integrity also requires a strategic multimodal approach, which NH has failed to take.
- 55 Increasing carbon emissions in a climate crisis is not effective stewardship in the public interest. In June 2021 the Climate Change Committee stated: *'Decisions on investment in roads should be contingent on analysis justifying how they contribute to the UK's pathway to Net Zero. This analysis should demonstrate that the proposals would not lead to increases in overall emissions⁴².'* In June 2022 it identified that *'Substantial investment in roadbuilding should only proceed if it can be justified how it fits within a broader suite of policies that are compatible with the UK's Net Zero trajectory⁴³.'* The case for the A57 Link Roads was developed many years in advance of DfT's Decarbonising Transport (2021) and the UK's Net Zero Strategy (2021), and did not foresee these key policy documents of the current legal framework, let alone attempt to align with them. The traffic modelling failed to express either document's policy objectives or targets as core assumptions - the current traffic models are based on assumptions which reflect very different scheme specific objectives that date from many years ago.

Licence Para 4.2 Without prejudice to the general duties on the Licence holder under section 5 of the Infrastructure Act 2015, the Licence holder must, in exercising its functions and complying with its legal duties and other obligations, act in a manner which it considers best calculated to:

Para 4.2d. It must ensure efficiency and value for money.

- 56 NH prematurely rejected alternatives (our package of lorry control system and sustainable travel measures; and the proposed Mottram Gyrotory Flow) that both

³⁹ REP12.028 Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 page B34 para 15.3.8; pdf page 110/170 - submitted by CPRE

⁴⁰ A57 Link Roads, ES, Appendix 2.1 Traffic Data, AAWT Opening Year 2025

⁴¹ Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 page B32 Table 9 pdf 108/170

⁴² Table A6 pdf page 20/32 Joint Recommendations Report to Parliament, Climate Change Committee June 2021

⁴³ Page 139, Progress Report to Parliament, Climate Change Committee, June 2022

scored as well or better than the scheme in the 2015 Trans-Pennine Routes Feasibility Study.

57 Our package was rejected as difficult to deliver – updated technology has simplified lorry control systems based on weight restrictions. The MGF, as proposed by an IP Mr Bagshaw, was initially described⁴⁴ as the ‘*best performing individual option against the sifting criteria and for meeting the objectives for the Scheme*’ and as deliverable and feasible. Then, curiously, at this point in the assessment of options⁴⁵ it was decided to assess the MGF not as a standalone scheme, nor in conjunction with other sustainable measures, but in conjunction with a package of measures which included first and foremost a link road between the A57 (T) and the A57 in Glossop.

58 As NH failed to review the options during development of the outline business case for the scheme, the scheme is not proven to provide the most efficient and best value for money. The Economic Case for the scheme has not been made.

59 Compounding this error is the failure to include public transport, walking and cycling in the traffic modelling, which led to a BCR that does not reflect the current policy framework. The Government plans to cut urban traffic by increasing walking and cycling to 50% of all trips by 2030. Greater Manchester plans for no net increase in motor vehicle traffic and to reduce car’s share of trips to no more than 50%, with the remaining 50% made by public transport, walking and cycling by 2040. Had the traffic modelling reflected these policy measures it would have shown a reduction in traffic forecasts for the scheme, and therefore a reduction in the value of journey time savings and the value for money. The failure to include public transport walking and cycling is part of NH’s failure to engage with the strategic context of the proposal (see para 92).

Licence Para 4.2e. It must protect and improve the safety of the network.

60 The SRN and local road network would become more dangerous for drivers, not safer, with the scheme. The risk of road crashes would increase across the modelled network by 0.3%, the brunt of which would occur on the A628T and the A57 Snake Pass (county A road across the National Park). Despite the increased risk being a direct result of the scheme NH dismissed it as insignificant and offered no mitigation.

61 The increased crashes on the A628T would appear despite, and would negate the effect of, the A628T Safety and Technology improvements, previously part of the scheme but progressed separately as not requiring development consent. The improvements focus

⁴⁴ REP2-005 revised ES Ch 1-4 Introductory Chapters, page 100 Table 3.3 (23 Options assessed at the initial sift)

⁴⁵ Trans-Pennine Routes Feasibility Study, 2015, Appendix 2, the Stage 2 Report of this same study [Annexes – Annex 1], para 5.9

on crash hotspots and the provision of electronic signs⁴⁶ and were included within the baseline 'do minimum' scenario⁴⁷ for the scheme. The increased risk of crashes on the trunk route is due to traffic diverting off the safer motorway network and onto the A628T⁴⁸. In addition, *'the severity of the accidents which are predicted to occur on the new link road may increase due to the increased speed'* (TAR 7.2.12). NH's acceptance of increased crashes on the SRN does not meet the statement in Road Investment Strategy (RIS) 2020-2025: *'enhanced safety remains Highways England's first imperative and informs everything it does from design principles, road standards, operational procedures and investment decisions. We will strengthen this ambition through our investment plan, performance specification and targeted safety improvements through the small schemes fund'*.

- 62 The A57 Snake Pass *'is forecast to experience a modelled predicted increase of more than 160 accidents over the 60-year appraisal period⁴⁹'* with the scheme. NH took the attitude that *'safety features in areas outside the Scheme are not within the Applicant's remit⁵⁰'*. The route is already considered a high risk rural road. To mitigate the scheme's impacts Derbyshire County Council proposed the use of average speed cameras. However, such measures would cause harm to the National Park's statutory purposes and were challenged by the National Park Authority⁵¹. In the face of these difficulties NH proposed to 'update' the model with respect to the incidence of crashes on the Snake Pass at the detailed design stage when there would be no accountability through the EiP. *'It is possible that the appraisal overestimates the forecast increase in accidents on this section of road...'* *'...scheme modelling will be updated as the detailed design evolves⁵²'*. The start of the Snake Pass is 3.2miles east of the scheme. The detailed design of the scheme is not going to alter the incidence of crashes on the Snake Pass unless it includes a massive traffic restraint measure akin to the Mottram crossroads and/or average speed cameras along the Pass. This 'updating' appears most unusual as the modelling of accidents on the Snake was set up to ensure the most accurate relationship between accidents and flow [REP2-090, 4.7.32-4.7.33]. It appeared to us as subterfuge – an attempt to 'magic away' adverse impacts of the scheme and avoid mitigation which could prove difficult and costly to implement.

⁴⁶ The Case for the Scheme 2.1.9

⁴⁷ ES Ch1-4 Introduction 2.4.6-2.4.9; 3.4.5

⁴⁸ APP-185, 7.2.13

⁴⁹ Transport Appraisal 7.2.11-7.2.13

⁵⁰ Consultation Report Appendix Y page 167

⁵¹ REP12-014 SoCG between PDNPA and NH, 2.3.6

⁵² REP9-020 SoCG between Derbyshire County Council and NH, 9.5

Licence Para 4.2f. It must cooperate with other persons or organisations for the purposes of coordinating day-to-day operations and long-term planning;

- 63 This duty stems from section 5(1) of the Infrastructure Act 2015, to cooperate with other persons or organisations in order to:
- (a) Facilitate the movement of traffic and manage its impacts;
 - (b) Take account of local needs, priorities and plans in planning for the operation, maintenance and long-term development of the network (including in the preparation of route strategies);
 - (c) Provide reasonable support to local authorities in their planning and the management of their own networks.
- 64 We have not been privy to any of the meetings between the statutory stakeholders and NH. What follows has been collected from written statements made before and during the EiP. On the evidence before us NH has failed to meet this duty and licence condition.
- 65 As noted in para 22 above two local authorities and the Peak District National Park Authority put in holding objections on the basis of inadequate information. The latter changed this to an outright objection. This reflected not only the adverse impacts on the National Park, but also the lack of information available in the DCO documents.
- 66 HPBC requested an extension to the 2020 statutory consultation area so that all wards within Glossopdale would receive a coloured brochure about the scheme. This was denied.
- 67 NH refused to meet High Peak Borough Council's request to assess air quality through two AQMAs. It remains an area 'not agreed' through the SoCG⁵³ (see para 45 above).
- 68 NH dismissed the need for mitigation measures requested by High Peak Borough and Derbyshire County Councils for traffic impacts and increased risk of road crashes. NH considered all these impacts to be insignificant and not requiring mitigation. Towards the end of the EiP NH agreed to work on some measures, outside the DCO process, thus avoiding public scrutiny.
- 69 It refused to meet the Peak District National Park Authority's request to assess the impacts of the scheme on the European Natura 2000 sites adjacent to the trunk route⁵⁴, on the Tintwistle AQMA and on the Tintwistle Conservation Area.

⁵³ REP12-008 & REP12-025 SoCG between High Peak Borough Council appears in library twice, documents are the same, paras 9.5, 9.18 & 9.20; REP2-046, 19.1 HPBC Local Impact Report; REP9-033

⁵⁴ REP12-014, 2.1.1.2, 2.3.1

70 Although NH's safety responsibilities are limited to the SRN, it is expected to cooperate with government agencies, the devolved administrations, local government, enforcement authorities, a host of other public and private bodies, and road users to improve road safety⁵⁵. Every Local Highway Authority with responsibility for the roads that would see increased crashes with the scheme in place unanimously seek reduction of road crashes and casualties, all of which NH has ignored both in future day-to-day operations and long term planning:

- DCC LTP 3 2011-2026;
- South Yorkshire Mayoral Combined Authority⁵⁶, which aims to improve safety on the network for all users. *'Safety for all road users must remain of paramount importance'*;
- South Yorkshire Local Transport Plan aims to maximise safety⁵⁷;
- Sheffield City Council Transport Strategy (2018)⁵⁸;
- Kirklees MBC 2025 Transport Vision⁵⁹;
- GMCA's *'ambition'* is *'To reduce deaths on our roads as close as possible to zero (by 2040)⁶⁰'*.

71 In the final version of the SoCG between Transport for Greater Manchester (TfGM) and NH, TfGM requested that NH provide a response to how the scheme would contribute to the Government's Transport Decarbonisation Plan and to Greater Manchester's local carbon targets and budgets⁶¹. *'The Climate Emergency declarations that are guiding local policy and therefore 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'*. NH refused this request despite the requirements of NPSNN para 4.4 and the EIA Regulations. However, it *'prepared a table to split the predicted GHG emissions for Greater Manchester and ... has issued this to TfGM.'*

⁵⁵ DfT's The Road Safety Statement 2019 A Lifetime of Road Safety

⁵⁶ Roads Implementation Plan 2020 SY MCA <https://governance.southyorkshire-ca.gov.uk/documents/s3997/Annexes%201%20The%20Roads%20Implementation%20Plan.pdf>

⁵⁷ SY LTP 2011-2026 7.1-7.15

⁵⁸ Transport Strategy 2019-2035 Sheffield CC <https://www.sheffield.gov.uk/home/travel-transport/transport-strategy-plans>

⁵⁹ <https://www.kirklees.gov.uk/beta/planning-policy/pdf/supportingDocuments/transportInfrastructure/2025-Kirklees-Transport-Vision.pdf>

⁶⁰ Transport For Greater Manchester, 2040, revised Jul 2021, <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/supporting-documents/?folder=\09%20Connected%20Places#fList>

⁶¹ REP12-009 TfGM Statement of Common Ground para 10.3, pp 28-29

72 TfGM also asked NH ‘*how the scheme contributes to Greater Manchester’s Right Mix targets and the Greater Manchester’s 2040 policies*’. This is Greater Manchester’s plans for no net increase in motor vehicle traffic and to reduce car’s share of trips to no more than 50%, with the remaining 50% made by public transport, walking and cycling by 2040. NH avoided the request and gave a tangential answer. In fact the traffic modelling in which TfGM had played no part had taken no notice of the Right Mix targets, and hence it could not know what impact the scheme would have. It is still unclear if TfGM understands the impacts of the scheme as it was only engaged in scrutiny of the scheme through the SoCG

73 Despite the scheme creating adverse impacts on the responsibilities of all these authorities, NH refused to take responsibility for addressing them, deeming them insignificant and, if related to traffic impacts, the responsibility of the highway authority.

Para 4.2g. It must minimise the environmental impacts of operating maintaining and improving the network and seek to protect and enhance the quality of the surrounding environment;

74 NH fails to meet this statutory direction as follows.

75 Operational GHG emissions have not been minimised as no traffic restraint measures were applied to the proposal⁶². The scheme would result in 410,000tCO₂ emitted over 60 years.

76 Hollingworth and Tintwistle - NH has failed to minimise the environmental impacts of the SRN as it passes through Hollingworth and Tintwistle. These two villages straddle the A628T, lie immediately east of the scheme and experience traffic congestion with long queues, air pollution from heavy lorries and increased road crashes. Every consultation about the scheme has raised key concerns around these two villages, found the plans did not address their problems⁶³, and showed strong support for measures to relieve traffic through both villages. In the 2018 statutory consultation⁶⁴ Highways England declared it ‘*is unable to resolve*⁶⁵’, that Hollingworth and Tintwistle are not part of the solution. During the 2020 consultation NH refused to engage with questions on Hollingworth and Tintwistle, stating that measures for wider relief are at an early

⁶² NH stated orally that no restraint was applied to the traffic model for the current scheme [EV-25 Issue Specific Hearing 2 Session 2 page 10 3rd line]. However when summarising its position at the Hearing, NH ignored the wider and deeper questions posed by the ExA about restraint of motor vehicles, encouraging active travel, and promoting routes which avoid the National Park. It referred only to restraint applied to HGVs in 2015 Trans-Pennine Routes Feasibility Study when testing options [REP4-008 Item 3d page 15].

⁶³Trans Pennine Upgrade Programme Non statutory Consultation Report Oct 2017 4.10.3

⁶⁴ Trans Pennine Upgrade Report 2018 4.2.1

⁶⁵ Trans Pennine Upgrade Report 2018 4.2.1

concept design stage. Given that traffic along the entire Trans-Pennine route will be affected by the scheme this is a serious oversight. A strategic approach towards long term planning for the whole of the corridor would have avoided this.

77 The surrounding environment that the scheme would harm includes the (a) Peak District National Park, (b) Glossopdale and (c) Greater Manchester.

(a) The first statutory purpose of the National Park is to protect and **enhance** natural beauty wildlife and cultural heritage (our emphasis). The Dark Peak, crossed by both the A628T and the A57 Snake Pass, is famed for its desolate and exposed tracts of moorland that stretch great distances, create a sense of remoteness⁶⁶ and are largely inaccessible to motor traffic. The noise from traffic on all these roads already affects the natural beauty and tranquillity of the Park up to a mile distant on open moorland⁶⁷. The increased traffic generated by the scheme would further harm these nationally important landscapes and impair their tranquillity. NH refused to recognise that the impacts of increased traffic through the Peak District National Park would be significant, as considered by the statutory authority for the National Park, and offered no mitigation. The objection from the PDNPA shows that NH's interpretation of the National Park's statutory purposes and associated policies does not meet the standard required of it by its s.62 duty under the Environment Act 1995.

(b) Within Glossopdale the local environment would be impacted negatively by more congestion, rat running on residential roads, noise, and air pollution. NH dismissed the impacts as insignificant.

(c) The scheme would have a major irreversible negative effect on local landscape and townscape which NH refused to recognise as significant [APP-063, 7.7.8]. The scale and formality of its infrastructure - dual and single carriageways, three concrete underpasses, two bridges, huge new junction, lighting, signage, embankments cuttings and false cuttings, drainage features, fencing, access tracks, new plantings - and its associated traffic would encroach on and fragment open countryside reducing its permeability for wildlife; destroy the individual character of the pastoral landscapes; and harm the setting of the historic village of Mottram and the openness of the Green Belt. The huge new junction where the scheme crosses the A57T is out of scale with the surrounding townscapes. The scheme consumes open land, a finite irreplaceable asset in the UK. It is both natural capital and strategic open space, which supports multiple

⁶⁶ Dark Peak, Landscape Strategy, PDNPA, 2009

⁶⁷ Peak District National Park, State of the Park Report 2000, p 40 - Until recently the National Park was a complete tranquil area apart from Bakewell and Tideswell. By the late 1990s three roads with an excess of 10,000 vehicles per day within the Park, including the A628, reduced the tranquil area by 50%.

ecosystem services critical to urban areas which have higher vulnerability to climate change due to their lack of habitats.

Licence Para 4.2h. It must conform to the principles of sustainable development.

78 The licence spells out sustainable development as *'encouraging economic growth while protecting the environment and improving safety and quality of life for current and future generations.'* All of the above impacts described in paras 51-77 indicate that the scheme fails to conform to the principles of sustainable development.

Licence Para 5.29 It must comply with or have due regard to Government policy.

79 The NPSNN 2014 is the framework for decision making but recognises that relevant national, regional and local policies are in play. In particular a series of provisions of the Planning Act section 104 are incorporated in the NPS, and some of its requirements are specifically stated in terms of other laws and regulations such as the EIA Regs 2017. When dismissing challenges made by us or other parties using other policies, NH quoted NPSNN as the sole framework of relevance to decision-making. The scheme fails to meet a number of NPSNN policies as follows.

80 NPSNN 4.3 requires that for a proposed development the ExA and SoS should take into account its potential benefits, and its potential adverse impacts. The transport assessment and modelling are fundamental to the environmental assessment. With so many omissions and unexplained spurious results within them, it is not credible to even attempt to reach a reasoned conclusion on the significant effects of the proposed development.

81 NPSNN 4.4 requires environmental, safety, social and economic benefits and adverse impacts, to be considered at national, regional and local levels. There was no local or regional assessment of the scheme's carbon emissions despite two sets of available data (BEIS UK carbon emissions national stats and local authority SCATTER budgets from the Tyndall Centre), and a third set of self-scaling data – a local/regional proxy – provided by the study area and traffic model itself (when corrected and fully transparent) [REP9-039]. Local adverse impacts of all kinds – social environmental and economic – were concealed from the public and stakeholders at consultation stage and underplayed during the EiP (see paras 23, 32; Appendix A b-g; Appendix B b-g; Appendix C c, f, i, j).

82 NPSNN 4.6 – projects should usually be supported by a local transport model to provide sufficiently accurate detail of the impacts of a project. The impacts on Glossopdale were withheld from the public as detailed above (see para 23 above) and then from the EiP. When pressure on the issue increased throughout the course of the EiP NH stated that the work had been done, and yet still refused to share their findings with the Examination [REP8-018, Q3.6]. NH's detailed analysis of the traffic on one select link

[REP9-029], Dinting Road, appeared to validate IPs' requests for further analysis of all of Glossopdale but none was forthcoming [REP12-022, 9.87.8].

- 83 NPSNN 4.15-4.17 invokes Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which sets out the information that should be included in the environmental statement. The assessment of GHG emissions does not conform to these requirements [REP8-029, 7.5]. First, it does not provide an accurate quantification of the scheme in isolation; second, it does not provide a proper quantification of the cumulative carbon emissions; therefore, the application is not compliant with the EIA Regulations [REP8-029]. NH's claim that the traffic model is 'inherently cumulative, or is 'compliant with DMRB', does not make the environmental statement compliant with the EIA Regulations on cumulative carbon emissions assessment.
- 84 NPSNN 4.26-4.27 lists the legal and policy requirements for consideration of alternatives, which are not exhaustive. As we have shown above the 2015 options appraisal was flawed and has not been reviewed. Therefore the scheme's status within the RIS, the 2004 Tameside Metropolitan Borough Council Unitary Development Plan 2004 and the Greater Manchester Transport Strategy 2040 is questionable.
- 85 NPSNN 2, 2.24, 3.2 and 4.64-4.66 address road safety. The increased risk of road crashes on the A628T corridor and on local roads means NH has failed to meet the requirements of NPSNN which quotes the Strategic Framework for Road Safety 2011⁶⁸.
- 86 NPSNN 5.11-5.12 Air quality considerations are particularly relevant where schemes are proposed within or adjacent to AQMA or nature conservation sites (including Natura 2000 sites and SSSIs), and where changes are sufficient to bring about the need for a new AQMA or change the size of an existing AQMA; or bring about changes to exceedances of the Limit Values, or where they may have the potential to impact on nature conservation sites. NH adjusted the modelling in a way which removed potential exceedances of limit values for nitrous dioxide within 2 local AQMAs (one on the A57 Dinting Vale through Glossop and one on the A628T through Tintwistle), on A57 High Street West through Glossop and on the Natura 2000 sites adjacent to the A628T. NH refused to assess air quality at any of these locations including the two AQMAs. Hence these NPSNN considerations have been ignored.
- 87 NPSNN 5.150 Great weight should be given to conserving landscape and scenic beauty in nationally designated areas. Despite the scheme causing traffic increases on cross-Park roads, NH refused to recognise this requirement, arguing incorrectly that the policy only applies to development that lies within the National Park.

⁶⁸ <https://www.gov.uk/government/publications/strategic-framework-for-road-safety>

- 88 NPSNN 5.152 requires NH when planning the SRN to avoid National Parks, in this case the Peak District National Park. This it failed to do. The 2015 Trans-Pennine Routes Feasibility Study focused only on the corridor through the National Park. In addition, the scheme would cause traffic to divert off the M62 outside the National Park onto the A628T within the National Park.
- 89 NPSNN 5.202 *Development of national networks can have a variety of impacts on the surrounding transport infrastructure including connecting transport networks... The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development.* NH dismissed the scheme's impacts on the local road network as insignificant and refused to consider mitigation. They also refused to share with the Examination the work they had done which justified their conclusion that the effects were 'insignificant'.
- 90 NPSNN 5.207 requires the WebTAG methodology to be followed. We showed above (paras 30-36 and Appendix B) how the TAR failed to meet the requirements of a WebTAG compliant appraisal.
- 91 Other policies with which NH failed to comply, or to which it failed to have due regard, include:
- (a) The Treasury's *Green Book 2020* identified the common failure of those writing appraisals to engage properly with the strategic context in which their proposal sits. Specifically, business cases frequently do not demonstrate the necessary understanding of:
- the proposal's specific contribution to the delivery of the government's intended strategic goals (such as levelling up or net zero); and
 - the specific social and economic features of different places and how the intervention may affect them;
 - other strategies, programmes or projects with which the intervention may interact, including in a particular geographical area.
- This results in significant flaws in appraisals and business cases. All of the above bulleted shortfalls apply to the A57 Link Roads, were initiated in the 2015 Trans-Pennine Routes Feasibility Study from which the scheme derives⁶⁹, and have led to the noncompliance described in paras 52-60 and 78-91 above, and here in para 92.

⁶⁹ Trans-Pennine Feasibility Study, Highways England & DfT, 2015

<https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports>

- (b) The UK Net Zero Strategy 2021 - NH made no assessment of significance of the scheme's carbon emissions against the annual carbon reduction targets and trajectories for transport in the Net Zero Strategy [REP9-039, 10].
- (c) The Government's Decarbonising Transport, A better greener Britain; Bus Back Better – National Bus Strategy for England; and Gear Change – A bold vision for cycling and walking. By omitting walking, cycling and public transport (except rail users with access to a car) from its transport assessment NH has failed to comply with all of these.
- (d) *National Planning Policy Framework 2021, para 175*. NH refused to recognise that great weight should be applied to protection of the National Park and its setting. The objection from the PDNPA shows that NH's interpretation of the National Park's statutory purposes and associated policies does not meet the standard required of its s.62 duty under the Environment Act 1995.

Summary of noncompliance with statutory directions in Licence

92 Through development of the A57 Link Roads NH is failing to meet the public interest and provide effective stewardship of the long term operation and integrity of the SRN. The value for money of the scheme has not been ensured as the options' appraisal was flawed and has not been reviewed. The scheme would be detrimental to the safety of the network, not protect or improve it. NH has failed to co-operate with the local authorities and the National Park Authority over a number of issues. It has also failed to minimise environmental impacts – carbon emissions would increase; traffic would impact adversely on two adjacent villages, on Glossopdale, on the Peak District National Park; the proposed infrastructure is out of proportion to and would disfigure local landscape and townscape. Consequently the scheme does not conform to the principles of sustainability. This is reflected in NH's non-compliance with Government policy in NPSNN, the Treasury's Green Book, UK Net Zero Strategy, Decarbonising Transport, Bus Back Better, Gear Change and NPPF.

(D) FAILURE TO HAVE REGARD TO GUIDANCE IN THE LICENCE

Licence Para 5.15 It should seek to ensure protecting and improving safety is embedded into its business decision making, and to achieve the best possible safety outcomes.

93 The 2015 Trans-Pennine Routes Feasibility Study included a safety objective, against which the scheme scored +1 (beneficial impact). For the 2020 statutory consultation and for the DCO application the safety objective was omitted, despite high accident rates and accident clusters along the route, as safety measures were progressed separately from the scheme (the A628T Safety and Technology improvements). However, as these

measures were included in the baseline traffic modelling and road crashes increased, the mitigation appears to fail. Thus the evidence suggests safety was not embedded in the decision-making for this scheme, which would now score negatively (adverse impact) against such an objective.

Licence Para 5.23 It should ensure protecting and enhancing the environment is embedded into its business decision making.

- 94 NH did not avoid the Peak District National Park when planning the SRN as required by NPSNN 5.152.
- 95 There was no scheme objective to address GHG emissions or climate change despite the 2008 Climate Change Act and the UK's legally binding carbon budgets.

Summary of noncompliance with guidance in the Licence

- 96 Although these licence conditions are considered guidance, rather than statutory directions, they are extremely important. They are both concerned with business decision making which starts with options' appraisal, followed by scrutiny by DfT. Unless the initial appraisal is robust and scrutiny is rigorous the result will be a poor choice. The A57 Link Roads have been developed as a standalone scheme in order to build demand for the next section of new road. For fifty years NH and its predecessor organisations have been trying to force road building to link Manchester and Sheffield rather than address the transport issues within their strategic context. The Peak District National Park designation, through which the A628T corridor passes, does not permit major development unless there are exceptional circumstances and it is in the public interest. Most recently the climate and nature emergencies, and the experience of the Covid pandemic, also challenge the business-as-usual model of building roads to meet future traffic demand. The 50 year history of failed road solutions should be indication enough that what is required here is a fundamental rethink. The National Park designation and more recent events demand it. That is the context within which these licence conditions should be considered.

(E) CONCLUSION

- 97 We have documented above a catalogue of NH's non-compliance with the statutory directions and guidance laid down by the SoS in its licence. NH has evidently failed to meet baseline requirements, never mind meet higher expectations. The whole sorry story casts strong doubts on the credibility of NH and its evidence for the A57 Link Roads DCO application.
- 98 NH withheld crucial information, gave inconsistent, inaccurate or misleading statements and answers through the statutory consultations and the EiP. It repeatedly tried to

wriggle out of accountability for the scheme with obfuscation and delay. This is contrary to behaviour expected of a public agency to be as open as possible about all its decisions and actions, and to restrict information only when the wider public interest clearly demands.

99 The development of the scheme, from the 2015 feasibility study out of which it emerged to the DCO application, demonstrated all that the Treasury Green Book identified about the failure of project sponsors to engage properly with the strategic context in which their proposal sits. With respect to the A57 Link Roads NH failed to address (a) the proposal's specific contribution to the delivery of the Government's intended strategic goals in 2015 (such as climate change) and in 2021 (such as levelling up and net zero); (b) the specific social, environmental and economic features of Greater Manchester, Glossopdale, Longdendale and the Peak District National Park and how the intervention would affect them all; and (c) a raft of other strategies, programmes and projects with which the scheme would interact from the national to the more local. These ranged from addressing climate change and road safety - both key policy areas identified by the ORR for RIS3⁷⁰ - to Greater Manchester's transport decarbonisation programme through its Right Mix policy, and the PDNPA's goals to reduce traffic within, and through, the National Park.

100 The consequences of both NH's behaviour towards engagement with stakeholders and the public, and its failure as the steward of the long term sustainable future and integrity of the strategic road network, led to multiple areas of non-compliance with its licence conditions. These were demonstrated through the statutory consultations which failed to follow best practice; the transport assessment accompanying the DCO application which failed to meet the standard expected of a WebTAG compliant appraisal; the failure of the proposed scheme to conform with the principles of sustainable development; and finally through the EiP, the effectiveness and efficiency of which was compromised by NH's omissions and obfuscations. At the end of the EiP the ExA was still asking fundamental questions about NH's evidence, and new evidence that conflicted with NH's evidence was presented and left unscrutinised. The result is that neither the ExA nor the SoS have the information needed to weigh up the planning balance. The overall effect is to limit democratic involvement and accountability.

101 The ORR has recently identified that where projects fail to be delivered on time, most of the delays occurred during the development phase – before construction begins. Statutory planning processes were one of the four most prevalent risk factors. In our experience it is not the statutory planning processes, red tape or regulations which

⁷⁰ Road Investment Strategy 3 Our role and approach, May 2022, ORR, 3.4a and 3.4b
<https://www.orr.gov.uk/search-news/gearing-third-road-investment-strategy-ris3> ;
<https://www.orr.gov.uk/sites/default/files/2022-05/Road-Investment-Strategy-3-our-role-and-approach-2022-05-04.pdf>

have hindered the effectiveness of the A57 Link Roads DCO application and its EiP but NH's approach and behaviour towards consultation and the planning system. Any subsequent delay to delivery of the scheme - the scheme is at risk of missing its start of work commitment⁷¹ - can be laid wholly at NH's door, through its behaviour, its attempts to conceal the real effects of the scheme, its failure to engage robustly in discussions, its failure to have due regard to its legal duties and Government policy, its failure to plan within the appropriate strategic context.

102 These shortfalls in performance do not appear to be picked up when monitoring NH's performance. Although the key performance indicators (KPIs) test how well NH manages traffic on the SRN and how quickly it delivers its enhancement projects, they do not robustly test NH's role as the steward of the SRN's long-term future and integrity, fit to meet all the challenges of this century in a sustainable way⁷². For example, in the 2021-2022 assessment of performance, the focus is on individual project delivery with no mention of the strategic context of wider Government policy⁷³. Consequently, there does not appear to be a robust framework for monitoring all of the licence conditions.

103 Some of the non-compliance we have documented e.g. taking a piecemeal approach to addressing issues along a corridor instead of strategic long term planning, raise fundamental issues not only about the preparation of the RIS by DfT and of route strategies by NH, but also about the testing by DfT of potential projects as they pass through their development stages. The final stages for an NSIP - the statutory consultation and the DCO application - are deeply flawed. To have received holding objections from the statutory consultees in response to the 2018 consultation on the scheme, and to have not addressed those concerns before holding another statutory consultation smacks of both incompetence and disregard for standards of best practice. An effective approach would have been to address all the statutory consultees' concerns and to then seek public views before proceeding to a DCO application. Development of a NSIP should be front loaded with a WebTAG compliant transport appraisal and full environmental impact assessment available for public scrutiny before the formal DCO process is entered. The EiP would then be able to proceed as it appears to have been envisaged – to iron out technical issues with planning agreements. In view of what we have experienced we believe a review of all these processes is required and that monitoring of them should be more robust.

104 Two key areas are highlighted by the evidence we have presented - environmental issues and engagement with stakeholders, organisations and the public. Environmental impacts and objections on environmental grounds are a key risk to the achievement of

⁷¹ Annual Assessment of NH's Performance 2021-2022, ORR, July 2022, Table B11

⁷² Annual Assessment of NH's Performance 2021-2022, ORR, July 2022

⁷³ Annual Assessment of NH's Performance 2021-2022, ORR, July 2022

planning consents for road schemes⁷⁴ yet environmental issues are not addressed through the RIS and only at a late stage of the NSIP process when the DCO application is submitted. This means adverse impacts are only picked up very late through a process which is not geared to addressing fundamental issues, only to tinkering around the edges. The entire programme being considered for RIS3 (whether carried over from RIS2, or new schemes) must be assessed within a Strategic Environmental Assessment as required by the Infrastructure Act 2015 and the Strategic Environmental Assessment Directive. Schemes should not enter the RIS unless they have been subject to a full and proper appraisal. Once chosen the options appraisal should be regularly reviewed to ensure the scheme remains the best performing, sustainable and cost effective option. The full environmental assessment and the transport appraisal on which it is based should be the subject of scrutiny through the statutory consultation, as we have noted above.

105 With respect to engagement there is no KPI. A review two years ago⁷⁵ of NH's engagement and cooperation with regional and local partners, but not the public or communities, concluded that *'Highways England is complying with the prescribed elements of its licence engagement duties but there is scope for further development of its duties to support regional and local stakeholders and manage their expectations'*. It specifically drew NH's attention to *'recognition of the obligations and priorities of local stakeholders, for example in areas such as decarbonisation and air quality'*. Through the A57 Link Roads, NH's response to stakeholders concerns was the reverse of the ORR's advice – it denied their significance and/or their legitimacy to be considered, of which the most extreme examples were to take no account of Greater Manchester's well developed approach to decarbonisation through radical changes in travel behaviour, or of the views of the statutory authority for the National Park, the PDNPA. Our experience also showed how poorly NH has failed to engage with communities and the public. Engagement must be formally addressed and monitored, as engagement worthy of a public body applies to all elements of the licence. The ORR has promised to review assessment of engagement as part of NH's RIS2 and RIS3 plans⁷⁶ but this should be extended to cover community and the public's engagement in project development.

106 NH receives huge sums from the public purse - in financial year 2020-2021, it spent £160,527,000 on staff and £3,198,000 on consultancy fees⁷⁷ - and is responsible for spending the £24billion committed to the 2020-2025 roads' programme. For that the public would expect NH's performance to at least meet the requirements of the licence, if not the extra mile, and for robust monitoring of that performance.

⁷⁴ Road Investment Strategy 3 Our role and approach, May 2022, ORR, para 3.50

⁷⁵ Review of Highways England's engagement approach with regional and local partners, June 2020,

⁷⁶ Road Investment Strategy 3 Our role and approach, May 2022, ORR, 3.71c

⁷⁷ Highways England Annual Accounts and Reports 2021

107 With respect to the A57 Link Roads we therefore urge the ORR to assess NH's performance in the light of this representation to you and report its findings to the SoS before he makes a decision on the scheme in mid-November 2022. More generally we urge the ORR to enforce behaviour that is expected of a public body and to review the overall monitoring of NH's licence. In particular, we suggest that the ORR a) reviews development of DfT's RIS and NH's route strategies to ensure that schemes that arise from them meet all the criteria for sustainable development, especially with regard to the climate and nature crises; b) insists on, or provides, much more robust assessment and monitoring of scheme development from options appraisal through to project business case; and c) reviews or instigates a review of the complete NSIP process.

APPENDIX A

OMISSIONS AND MISREPRESENTATIONS IN 2020 STATUTORY CONSULTATION

- a. There was no transport assessment, traffic data or traffic modelling results; this despite the SoCC p5 promise of *'more information about key environmental impacts including air quality, noise and traffic.'* Later when presenting draft traffic information to the local authority steering group NH⁷⁸ *'confirmed this was the data presented within the Preliminary Environmental Information Report (PEIR)'*. No traffic data was presented in the PEIR or available to the public until the DCO application was submitted.
- b. There was no mention in any of the documents of the impacts of increased traffic, all generated by the scheme, on Glossopdale. This would lead to rat running on residential streets to avoid congestion on the A57 through Glossop. People were unaware that, with the scheme, the walk or cycle to school, work or the shops would become more intimidating, dangerous and unpleasant; congestion would increase journey times for drivers within Glossopdale; road crashes would increase. The FAQ gave the opposite impression. *'Will the scheme create traffic in other areas? What about Glossop?'* was answered as *'Our traffic assessment shows that overall, the scheme draws traffic on to the strategic road network and off local roads. Therefore we wouldn't expect to see a significant increase in traffic through Glossop during peak times.'* This misrepresentation was only revealed through the EiP.
- c. The infrastructure for the scheme lies within the National Park setting and ~2km from its boundary. There was no mention of the increased traffic on trans-Pennine routes through the National Park or its impacts on tranquillity, wildlife and road crashes, again all only revealed through the EiP.
- d. The whole scheme lies within and crosses the Green Belt yet the word Green Belt appeared only once in - PEIR Vol 3 with respect to the Planning Act 2008. There was no mention of the strict policies surrounding Green Belt, no map of the Green Belt, no mention of the scheme's profound impacts on four of the five functions of the Green Belt and its harm to openness, as revealed by the EiP. Of all planning policies, Green Belt is the best known, best loved and best understood by the general public but it was completely excluded from all the consultation documents.

⁷⁸ APP-026 Consultation Report [Table 3-2] accompanying the DCO application, published July 2021

- e. Safety was only addressed in the FAQ where a misleading impression was given. Improving safety for road users was described as a key objective of the A57 Link Roads, but there was no such objective. Safety benefits improvements were implied: *'Our traffic assessment shows the scheme reducing accidents across the local area, because traffic will be moved onto more modern roads.'* There was no mention of the increased risk of road crashes in Glossopdale and on trans-Pennine routes which came to light in the DCO application.

- f. The economic justification for spending £225m (later reduced to £180m) on the scheme was not made. The statement in the brochure that congestion *'restricts potential economic growth, as the delivery of goods to businesses is often delayed and the route is not ideal for commuters, which limits employment opportunities'* was not informed by evidence.

- g. The colour brochure showed prejudicial bias. It focused to the exclusion of all else on the immediate benefits to residents in Mottram and on Woolley Lane and on the engineering and design changes made since the 2018 consultation. There was no mention of Glossop as a township that might be affected by the scheme – the word Glossop appeared only twice in the brochure to explain that the *'Glossop bound'* traffic would be separated. There was not a single mention of GHG/carbon emissions despite the all-pervasive climate emergency and the fact the scheme would increase these emissions. There was no mention of road safety or of the adverse impacts on the Green Belt. With more pressing issues such as the Covid pandemic on people's minds, the brochure is likely to have been the only document the majority would have read. Its systematic distortion and concealment of the scheme's effects misinformed people as to the effects on their well-being and quality of life.

APPENDIX B

OMISSIONS AND FLAWS IN TRANSPORT ASSESSMENT REPORT

a. Traffic modelling – No details appeared in the TAR. In three and a half pages it named the modelling software and used three figures to show the modelled area and local zone disaggregation. There was no local model validation report, no forecasting report, no options report, no strategic case report, no economic case report, no appraisal summary table.

(i) Assumptions and factors which were built into the model and the values ascribed to these factors were not available to stakeholders or to the ExA.

(ii) No information was available as to how public transport, walking and cycling were dealt with in the model. Late in the EiP NH revealed that only rail trips for households with a car were included. NH continued to confuse the definitions between rail, public transport as a whole, trips which were included or not included in the model and in fact how the limited rail modelling was undertaken [REP9-040, Q3.4, page 5].

(iii) The source of errors in terms of model parameters and specification were concealed from the EiP. NH stated⁷⁹ they were captured in the high and low growth sensitivity tests but provided no details.

(iv) The impacts of the scheme on transport networks in Greater Manchester, despite the majority of journeys being within it, were not presented. Later NH revealed that the scheme was treated as an isolated bypass with limited access to Greater Manchester, with a fixed cost function and masking applied to Greater Manchester within the model.

(v) Data from various sources was used to calibrate the model but how it was applied was not fully explained or given in sufficient detail. Conflicting statements were made about updating the model⁸⁰.

(vi) Inconsistencies in the outputs from the model remained unexplained at the end of the EiP on a number of routes through and within Glossop, Hadfield and Padfield, and along the A628T⁸¹. NH dismissed IPs' attempts to understand these as mistaken⁸² but failed to supply

⁷⁹ REP11-010, 3.3. NH response to ExA's Third Written Questions

⁸⁰ APP Data was collected during 2020-2021 according to the Case for the Scheme 4.3.5 and 4.3.6 for model development. NH refuted this and said only 'historic' data was used REP9-027/9.79.111

⁸¹ REP8-034, 9.69.16; REP9-043; REP10-012, pp 2-3

⁸² REP9-043 Response to PD-014 - Report on Implications for European Sites

a valid explanation for the majority of these or to provide specific data to validate its arguments.

(vii) The EIA Regs Schedule 4 para require *'a description of the relevant aspect of the current state of the environment (baseline scenario)'*. This is essential to understanding the current traffic situation and how it would change with the scheme. With the impact of Covid 19, the most recent actual traffic flows would be 2019. Instead NH used traffic surveys from 2015-2016 and modelled them to create the 'do minimum' scenario in 2025 against which to test the impacts of the scheme. This is not a 'current baseline' and led to a number of discrepancies when comparing the 2025 'do minimum' with existing counts from the DfT traffic website – some flows were much greater, others much lower.

All the above led to enormous problems with understanding the outputs from the traffic model.

b. Road crashes – The TAR, like the consultation documents, maintained there would be *'reduced safety risks within the built up area...'* (TAR Executive Summary). The built up area includes Glossopdale where High Peak Borough Council's Local Impact Report [REP2-046] showed an increased risk of road crashes on residential roads in Glossop. NH excluded from assessment residential roads on *'which the scheme is not expected to have an impact'⁸³*, roads which we now know through the EiP process, and which NH knew when it submitted the DCO documents, would have more traffic as a result of the scheme and therefore more crashes. The evidence presented in the TAR is the shockingly poor Figure 7.8 of the spatial distribution of safety impacts (the scheme incurs a safety disbenefit of -£7.32m over 60 yrs) which is too crude to decipher in the built up areas.

c. Severance – the word does not appear in the TAR. In Environmental Statement (ES) Ch12 NH's concern is wholly with severance of land holdings and reducing community severance on the bypassed A57T⁸⁴. Nowhere is NH concerned with the severance experienced by those attempting to cross the A628T in Hollingworth or Tintwistle (despite the *'high number of pedestrian accidents'⁸⁵*), the A57 through Glossop or residential roads in Glossopdale where traffic generated by NH's scheme would increase.

d. HGVs –The high percentage of HGVs along the trunk route subjects people, communities and the fabric of buildings adjacent to the road to severe impacts. The TAR barely addresses the issues⁸⁶. The scheme removes HGVs from part of the A57T but not from the A628T through Hollingworth and Tintwistle or from the A57 through Glossop. Yet the TAR does not

⁸³ TAR Figure 3.8 The Case for the Scheme 4.5.2;

⁸⁴ ES Ch. 12. 12.9.84

⁸⁵ Trans-Pennine Routes Feasibility Study 2015, Stage 1 Report 1.2.11

⁸⁶ TAR 1.1.2, 3.7.14 HGV percentages and numbers are given in Table 3.8 and Figures 3.6, 4.8, 7.1, 7.2, 7.5 and 7.6.

address their potential diversion to avoid congestion along these routes, or the severance, the intimidation, the risk of road crashes, the disincentive to walk or cycle on these routes that HGVs impose. NH's only concern is for the small length of the trunk road that would be bypassed. This is in direct contradiction to NPSNN's insistence at para 5.202 that impacts on local road networks must be taken into account.

e. Journey time savings – The TAR spells out the importance of journey time reliability (para 1.1.1), which features in the scheme's objective for connectivity (para 1.2.1), and provides monetised benefits worth £11m (para 7.2.6). Despite their significance, journey time savings were presented only as partial parts of journeys, not actual journeys the travelling public would make. Journey time savings on the SRN between Manchester and Sheffield were given for a 10-mile stretch of a 40-mile journey between the city centres and avoided the congestion that would be met within both urban areas. NH's main argument was to claim¹³ that journey times are captured in the modelled road network, which is no substitute for presenting specific evidence. The reason for NH's resistance became clear when it revealed Sheffield to Manchester journey time savings as ~5 minutes [REP5-022, 9.54.64]. This answer meant that claimed city-to-city journey time savings would be significantly reduced - for the 10-mile stretch eastbound savings were predicted as 8-10mins and westbound as 5-6mins – which would substantially reduce the value for money of the scheme and hence the Benefit Cost Ratio.

f. Public transport – There was no assessment of the potential for car journeys to switch mode to public transport, or of the time delay that would be experienced by bus passengers on routes which would see increased traffic. In TAR 3.4.11 NH claimed bus services '*will benefit from improved journey times and reduced congestion*'. This was revealed as a misleading assertion without evidence; in response to the ExA's questions⁸⁷ NH admitted it had not assessed bus times. Bus journey times should have been supplied in the TAR. When they were finally supplied [REP6-017 Appendix A] some improved and some took longer with the scheme.

g. Impacts on Glossopdale – we have detailed these above. The TAR referred only to journey times from Glossop (para 7.1.16) and to '*small increases in accidents through Glossop*' (para 7.2.13), by implication on the A57. Repeated requests for a proper assessment using a local model were refused, despite the requirements of NPSNN 4.2.

⁸⁷ REP7-020 Response to ExA's Written Questions, question 3.14, pp 28-29

APPENDIX C

WITHOLDING OF CRUCIAL EVIDENCE DURING EXAMINATION OF DCO APPLICATION

a. Assessment of public transport

This was important in view of the strong policies in Greater Manchester for radical reduction of car trips and increased travel by public transport, walking and cycling. In order to understand how NH had assessed travel by all modes it was necessary to know how the traffic model dealt with this. This was not disclosed by NH until 5th April Issue Specific Hearing (ISH) despite constant reference to public transport in our emails, at technical meetings, and through requests for clarification. When we first asked NH in July 2021 how public transport was included in the model, we were referred to the transport modelling and forecasting reports submitted with the DCO. As stated above (Appendix B a.) there were no transport modelling or forecasting reports submitted with the DCO, only the TAR which told the reader nothing about how public transport was assessed. Furthermore neither the Transport Modelling nor Transport Forecasting Packages⁸⁸ supplied to us in November 2021 contained that information. Despite two meetings with NH, we were still asking for clarification in March 2022. To aid progress MTRU asked NH to confirm our understanding with a suggested statement for us to agree with NH within a SoCG: *“The model contains public transport trips by people who have a car available but not by other users. In addition, only trips with either an origin or destination in the Area of Detailed Modelling are actively modelled. All other public transport trips are fixed.”* We received no reply and were only answered orally during the ISH on 5th April and by writing [REP8-018 page 55]. However, even that answer contained obfuscation as there were apparently two traffic models for the scheme – a regional mode choice transport model to forecast mode shift and a traffic model.

b. Review of appraisal options

(i) In order to establish if the scheme continued to be the best option since it was chosen in 2015, it was important to establish if a strategic level re-assessment of options had been undertaken since the original sifting of options in 2015⁸⁹. The Treasury’s Green Book 2020 advises that options should be checked at each stage of the Business Case process, updating of the appraisal options is expected for all schemes in the RIS⁹⁰, and since 2015 addressing the climate and nature crises has become urgent. Another strong reason for review was the lack of a suitable traffic model for the 2015 Study. As a result the Study noted (Stage 3

⁸⁸ REP2-090 – Transport Modelling Package pdf pp 98/790; Transport Forecasting Package pdf page 256/270;

⁸⁹ A57 Link Roads 6.3 ES Chapters 1-4 Introductory Chapters Planning Inspectorate scheme reference: TR010034 Application document reference: TR010034/APP/6.3 para 3.3 Page 97 of 134

⁹⁰ RIS1 2015-2020 para 2.12; Treasury Green Book November 2020

Report 4.2.17) there is *'a risk that forecasts developed using a new traffic model may differ from those produced as part of this assessment.'*

(ii) NH's answers when questioned on this matter were changeable. It first confirmed in August 2021 *'that we have not repeated the Early Appraisal Sifting Tool (EAST) since finalising the options in 2015'*. It then used timing as an excuse not to undertake the review - *'The updated Green Book postdates consideration of alternatives to the Scheme and selection of the preferred option'*⁹¹ - ignoring the fact that the need for review continues after selection of the preferred option. When questioned by the ExA, NH then claimed it had undertaken a review, using changes to design or exclusion of certain elements⁹² which is not what a strategic review of the options appraisal is about. When challenged on that argument it reverted to its original position of not having undertaken a review because *'it would not be practicable'*⁹³. We therefore concluded that NH had not undertaken a review as required by RIS and the Treasury Green Book. Trying to show it had undertaken the required review when it had not emphasised how poorly NH has followed procedure and how it sought to conceal this from the EiP.

c. Explaining the spurious traffic data

(i) The outputs of the traffic model, i.e. the predicted traffic flows and their distribution, nature and composition, were fundamental to all the evidence about the scheme's effects on the transport networks, on road safety and on the environment, society and the economy. Clarity is required on both the model's limitations and its outputs. Our lack of confidence in the modelling and its results increased throughout the EiP, was shared by other interested parties (IPs), and was comprehensively expressed through a joint letter to the ExA [REP10-017]. It was also shared by the Peak District National Park Authority⁹⁴ and by High Peak Borough Council⁹⁵.

(ii) Initially NH relied on blanket statements that it had absolute confidence in the traffic modelling, which is no substitute for open, comprehensive and consistent presentation of data and for engaging with challenges constructively. Later it described the process in some detail but the outputs – the spurious and extraordinary traffic modelled results - were not explained. It persisted with addressing questions about content with answers about methodology. It used arguments that did not withstand scrutiny and, when challenged, provided the same arguments. It failed to engage with substantive evidence submitted by us and others, and provided vague and unintelligible answers to questions. This severely impeded understanding of the traffic data and the scheme's impacts and led to the ExA asking serious questions about the traffic modelling even as the EiP closed.

⁹¹ REP7-025, 9.69.8

⁹² REP8-019, 9.75.34

⁹³ REP10-010, 9.84.13

⁹⁴ REP2-048 Local Impact Report 7.2.1

⁹⁵ REP2-046, High Peak Borough Council Local Impact Report, 19.1

(iii) Three working days before the EiP closed, NH supplied some explanation as to the disparities between some of the DfT observed traffic flows and modelled traffic flows in the 'do minimum' 2025 scenario [REP11-010, 3.1 page 13]. These explanations exposed local zone limitations as the cause of some of these disparities. These limitations are a good reason for using a more defined model of Glossopdale, something we and others had repeatedly requested throughout the EiP and been denied, and which NPSNN 4.2 requires.

(iv) Public interest in the integrity of the traffic modelling was extremely important for this scheme. The 2007 public inquiry into the Mottram-Hollingworth-Tintwistle bypass (the previous iteration of the scheme) was formally adjourned in December 2007 after 10 days of hearings due to serious flaws and repeated errors with the traffic model. Revised traffic figures due to an error in the traffic modelling were followed by further inconsistencies in feeding data into the traffic model⁹⁶ which ultimately rendered the results of the model null and void. The statutory consultees were unable to validate the traffic model and the public inquiry was formally closed in March 2009.

d. Uncertainty Log

NH's failure to engage constructively is also well demonstrated by its approach towards our challenge of the Uncertainty Log. In our written representation [REP2-069 4.2.11-4.2.17] we raised issues about the Uncertainty Log with respect to future development. A limited list was appended to the ES Ch.15 on Cumulative Effects. We found a much longer list in the Traffic Forecasting Package NH supplied to us [REP2-090, Appendix B, pdf pp 337/790]. We compared the results given in the DCO application documents with those available in the Traffic Forecasting Package, pointing out data was missing and asking for clarification on how the model had addressed future development. NH offered '*Details of the schemes and developments listed in the Uncertainty Log can be provided by National Highways if necessary*'. We responded '*As offered, please may we see the complete list, ie the long list and the short list, of schemes and developments excluded and included in the Uncertainty Log*⁹⁷'. NH responded⁹⁸ '*The uncertainty log is included in Appendices B & C of the Traffic Forecasting Report that has previously been provided by National Highways to CPRE*'. These were the very appendices which we had analysed in REP2-069 and to which we were seeking details and clarification. This circular game playing by NH was obstructive and did not address our concerns.

e. Investigation of Mottram Gyratory Flow (MGF)

⁹⁶ Mottram Tintwistle Public Inquiry 2007 HA-73 December 4th 2007; the Highways Agency announced that no more information would be available until late February 2008. It failed to meet this deadline and further deadlines in May 2008 and then October 2008.

⁹⁷ REP5-028, page 10

⁹⁸ REP7-025 9.69.18 page 14

One IP Mr Bagshaw presented the MGF as an alternative to the scheme. When asked by the ExA if the MGF alternative had been considered previously NH's response was an unequivocal 'No'⁹⁹. *'The Mottram Gyrotory Flow alternative presented in Mr Bagshaw's submission was not one of the alternative options considered by National Highways'...* *'The scheme previously proposed and presented in Mr Bagshaw submission was not one of the potential alternative solutions identified through this process'*. Towards the end of the EiP¹⁰⁰ the ExA was obliged again to ask NH to clarify its position as to whether the MGF, or a similar scheme was considered through options appraisal. The NH completely reversed its reply both orally at the hearing and in writing to a definitive 'Yes'. *'The option submitted by Mr Bagshaw was presented as an alternative scheme at the public inquiry of 2007. A scheme looking at a gyrotory system in the area of Mottram was assessed in 2015 as part of the EAST study; these were forwarded on to the DfT for consideration but were not included in RIS1¹⁰¹'*. Thus two directly contradictory answers were given by NH. Mr Bagshaw then showed that it had not been examined as a standalone option but only as an addition to the current scheme (REP8-042 para 5 pp 5-8).

f. Increase in vehicle kms

Both the TAR (7.2.9) and ES Ch.14 Climate referred to increases in vehicle kilometres generated by the scheme but no absolute figures were given. NH twice gave the opposite impression: *'Total vehicle kilometres across the appraised road network are effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic... and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys¹⁰²'*. Only in response to a question from the ExA, on 13th April (10 months after we originally asked for the figures) did NH reveal the increases in total vehicle kilometres due to the Scheme would be +0.7% (on approximately 12,000,000 daily veh-km in 2025) in the area of detailed modelling and +9.5% (on approximately 410,000 daily veh-km in 2025) in the Local Study Area¹⁰³. NH not only refused to supply the absolute figures to us but also denied there would any increase in vehicle kilometres.

g. A sensitivity test on the carbon emissions

NH submitted the results of the test but did not make the methodology of the test available¹⁰⁴. Nor did NH explain how the test affected the significance of the carbon emissions associated with the scheme. The validity of this test awaits DfT approval at some

⁹⁹ REP6-017 NH responses to ExA's second written questions Q3.8a

¹⁰⁰ REP8-019 Issue Specific Hearing 9.75.34 (kk) page 20

¹⁰¹ REP8-019 NH written summary of oral hearing 9.75.34 (kk) page 20

¹⁰² REP1- NH response to Relevant Representations RR-0543 page 147, 1st December; REP2-022 4.1 page 59

¹⁰³ REP8-019, 9.75.6

¹⁰⁴ REP5-026 2.2.5 onwards and Table 1; REP8-018 Appendix A

time in the future. Given this, it was incredible that this data was provided to the ExA as if it might add value to the ExA's recommendation to the SoS.

h. Visibility of the eastern portal of the underpass to the public

ES Ch.7, 7.9.25 implied that the eastern portal of the Mottram underpass would be visible from publicly accessible viewpoints. *'Views represented by Viewpoint 5 would be more open, with visibility of the new underpass structure and the cutting slopes present at the eastern portal'*. During site visits we searched from around Viewpoint 5 (on a public right of way) for visibility of the underpass structure but could not find it, and requested an accompanied site visit to view the eastern portal. In response NH considered *'that **all parts of the Scheme can be viewed from publicly accessible land, and thus we do not consider that an Accompanied Site Inspection will be required**¹⁰⁵'* (our emphasis). When we asked NH (email 22nd November) from where a full view of the eastern portal could be seen, it responded (21st December 2021) *'the only views of the eastern portal would be visible from private agricultural land containing no sensitive receptors'*. This is a complete contradiction to *'all parts of the scheme can be viewed from publicly accessible land'*.

i. Godley Green Garden Village (GGGV)

(i) GGGV is the largest proposed development within Greater Manchester, is included in Greater Manchester's emerging spatial framework Places for Everyone and would lie 1Km from the scheme on a road that joins the M67 J4 roundabout, at the western end of the scheme. The allocation is proposed to deliver 2,350 dwellings and would generate approximately 529 to 1,057 two-way vehicle trips during peak hours¹⁰⁶. Clearly this is a major development which would interact with the scheme. NH's approach towards the scheme's interaction with GGGV provided two diametrically opposed stances.

(ii) NH's assessment¹⁰⁷ for the DCO application records *'no significant cumulative effect'* as a result of the scheme with the GGGV development, a conclusion which is directly contrary to the Places for Everyone assessment in which NH participated. The latter records that traffic generated by this allocation is *'likely to result in material implications on the operation of the SRN that would require mitigation*¹⁰⁸ *'* at both the M67 J4 roundabout and M60 J24

¹⁰⁵ PDL-001 Letter dated 1st November 2022 to ExA regarding the Preliminary Meeting of the Examination

¹⁰⁶ 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

¹⁰⁷ ES Ch.15 Table 15-7 row 42

¹⁰⁸ 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

Denton Island¹⁰⁹ which lies 5-miles west of the scheme along the M67. Outside the EiP NH behaved as if the scheme would have significant effects: in response to TMBC's 2021 planning application 21/01171/OUT for GGGV, NH submitted a formal recommendation¹¹⁰ that planning permission is not granted for a specified period, as it did not have '*sufficient comfort that the development would not cause a detrimental impact to the SRN.*' The conclusions that NH reached in regard to the scheme's cumulative effects with GGGV are contrary to those evidenced by PfE and its own response to the planning application.

j. Transport for Greater Manchester's SOCG with NH

A prime example of delay is the handling of the SoCG between NH and TfGM. The initial version indicated TfGM was concerned with detailed design of traffic management [APP-192] but the second version in January 2022 briefly alluded to concerns about strategic planning issues [REP2-019]. The nature of the latter were not revealed until the next and final version of the SoCG appeared 4 months later during the final hours of the EiP [AS-010 and REP12-010]. Several new issues and new angles on known issues were disclosed as of concern to TfGM, all too late for scrutiny within the time frame of the EiP.

¹⁰⁹ 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

¹¹⁰ https://publicaccess.tameside.gov.uk/online-applications/files/9976136762C94B11142AEDBDD186C191/pdf/21_01171_OUT-CONSULTATION_RESPONSE_-NATIONAL_HIGHWAYS-1539049.pdf



LOW CARBON TRAVEL FOR LONGDENDALE AND GLOSSOPDALE

Report by
Keith Buchan, MTRU

for

CPRE Peak District and
South Yorkshire

September 2022

A57 Link Roads TR010034
CPRE PDSY Unique Reference:
20029243

Contents

Introduction and Summary	3
Part 1: History of proposals and policies for the A628 corridor	6
Part 2: Developing an alternative package – Low Carbon Travel for Longdendale and Glossopdale	8
<i>Developing and testing Options</i>	
<i>Solving problems</i>	
<i>Overall approach: building a package</i>	
<i>Summary Package: Low Carbon Travel for Longdendale and Glossopdale</i>	
<i>Pedestrians and buses: improving access and controlling traffic</i>	
<i>Bus service improvements: an integrated approach</i>	
<i>HGV control scheme</i>	
<i>Potential overall impact of Low Carbon Travel for Longdendale and Glossopdale</i>	
<i>Costs of Low Carbon Travel for Longdendale and Glossopdale</i>	
<i>Low Carbon Travel for Longdendale and Glossopdale Cost Benefit Assessment</i>	
Part 3: Analysis of the National Highways A57 Link Roads proposal	31
<i>Modelling and the modelled area</i>	
<i>Uncertainty and the Uncertainty log</i>	
<i>Conclusions on modelling</i>	
<i>Negative impact on local and national policies</i>	
Part 4: A57 Link Roads, Low Carbon Travel and conflicts with the carbon policy framework	40
<i>Carbon emissions</i>	
<i>Costing carbon</i>	
<i>The real impact of carbon</i>	
Part 5: Conclusions	51
<i>A new approach</i>	
<i>A flawed appraisal of the A57 Link Roads</i>	
<i>Way forward</i>	
Annex 1 Extract from Local Walking and Cycling Infrastructure Plans, Guidance for Local Authorities	52
Annex 2 Initial Option Assessment 2015	53
Annex 3 Output summaries for the DfT Active Mode Appraisal Toolkit (AMAT)	54

Introduction and Summary

This report presents a sustainable package of measures *Low Carbon Travel for Longdendale and Glossopdale (Low Carbon Travel)* and considers the National Highways (NH) proposed road scheme, the A57 Link Roads, in light of five key matters:

- 1) Whether a “starting from scratch” analysis would have produced different options from the road scheme to address the area’s transport related problems. This necessitates:
 - i. the accurate definition of what those problems are
 - ii. sufficiently detailed design of an alternative package
- 2) Whether the NH proposal is the best value way of addressing the problems in the area – this requires a preliminary analysis of value for money of an alternative using current methodology
- 3) Whether the appraisal and technical justification of the NH scheme conforms to guidance and good practice, in particular dealing with forecasting and uncertainty
- 4) Whether the NH proposal supports or conflicts with established local policies for transport, climate and the environment
- 5) Whether the scheme supports or undermines latest national Government policies for transport, land use and environment, in particular greenhouse gas emissions.

It also highlights a central paradox in the NH case. It will be a theme of this report that it is not possible to encourage travel by non-sustainable modes without undermining the promotion of sustainable modes. It is even possible to quantify the extent of the undermining using the Department for Transport (DfT)’s and NH’s own economic analysis. These arguments were presented to the examination and are reproduced here. NH did not put forward an argument that this was not the case: to do so would have to ignore the fundamental laws of economics. There were arguments over the extent and how this was measured, but no evidence was given that encouraging car use did not discourage a switch from car to other modes.

Linked to this is a wider point: investment in any transport scheme whose detailed appraisal reveals they do not conform to the Government’s carbon reduction pathway should not proceed. In this case neither the baseline without the scheme or forecasts with the scheme do so. This should have been flagged up at an earlier stage before any submission for consent was made.

The draft Development Consent Order (DCO) for the A57 Link Roads was submitted to the Planning Inspectorate on 28th June 2021 and accepted for examination on 26th July 2021. The examination commenced on November 16th 2021 and closed on 16th May 2022. During the course of the examination a great deal of material was produced and this report is based on the submissions made by MTRU in that context, but also the history of CPRE producing positive alternatives to road capacity increases. The first part of the report provides some history of the different proposals and policies for the local area, the National Park, and Greater Manchester. The second focusses on the alternatives, covering issue 1 above. The third focusses on the appraisal of the NH proposal and an alternative package (issues 2 and 3). The fourth deals with issues 4 and 5 on how the NH proposal conflicts with policies in a way which a sustainable package would not.

The majority of the material in this report was presented to the A57 Link Roads’ DCO Examination, and was therefore available to the Examining Authority and NH, but in separate submissions. These are all listed below with their URLs for ease of access. The reason for producing a report now is to bring the relevant submissions into a coherent document and to add analysis that had to be undertaken after the examination closed.

Local data on public transport and HGV movements was sought from NH in order to complete the analysis but was not forthcoming by the end of the examination. No data was provided

subsequently by NH. Consequently the work has had to be completed post-examination as best we can using average data from DfT sources. We have also used methods of appraisal based on DfT tools and guidance, including the DfT Transport Data Book, WebTAG and the Active Mode Appraisal Tool (AMAT).

Overall *Low Carbon Travel* demonstrated alignment with national and local transport policies, provided wider benefits outside the immediate confines of the Mottram section of the A57, and demonstrated high value for money. It would support regional programmes such as Manchester's "50-50" plan to make transport more sustainable, rather than hindering them.

Beyond the issue of conformity with Government commitments to carbon reductions NH's assessment of the A57 Link Roads was seriously flawed in other ways, for example not conforming to current DfT guidance on how to treat uncertainty. A previous strategic assessment of alternatives in 2015 used outdated assumptions and focussed on road building options. Impacts on the National Park were underestimated or omitted altogether. A significant amount of the material revealing this was not submitted to the DCO.

It is essential that a fresh options appraisal and re-assessment of specific proposals which would meet future national and local commitments is undertaken.

Material submitted to the A57 DCO with urls

- REP2-070 Alternatives first draft – see REP12-032 for corrected Table on page 15

REP2-070 <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-000857-CPRE%20PDSY%20-%20Other-%20report%20to%20accompany%20CPRE%20written%20rep.pdf>

REP12-032 <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001556-CPRE%20PDSY%20-%20Other-%20correction%20of%20an%20error%20in%20REP2-070%20-%20revised%20version.pdf>

- REP4-016 BCR package and scheme negative impacts on Government and local policies for sustainable travel

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001044-CPRE%20PDSY%20-%20any%20outstanding%20comments%20on%20Written%20Representations%20received%20for%20Deadline%202.pdf>

- REP4-031 Response to ISH 2 with Annex

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001045-CPRE%20PDSY%20-%20Other-%20response%20to%20ISH%202%20and%20written%20summary%20of%20oral%20submission.pdf>

- REP5-028 Rebuttal NH comments – supplementary note on traffic benefits page 12

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001078-CPRE%20PDSY%20-%20comments%20on%20submissions%20for%20Deadlines%203%20and%204.pdf>

- REP6-033 New model runs for carbon KB comments

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001154-CPRE%20PDSY%20-%20Other-%20response%20to%20REP5-026%20&%20ExA%20WQ2%20Q8.2%20Cumulative%20Carbon.pdf>

- REP7-034 How does the model include public transport

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001222-CPRE%20PDSY%20-%20Keith%20Buchan%20How%20does%20the%20model%20include%20Public%20Transport%20F.pdf>

- REP7-035 Response to NH comments in REP6-033 on carbon and showing scheme is within a major conurbation

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001223-CPRE%20PDSY%20-%20Keith%20Buchan%20response%20to%20REP6-033.pdf>

- REP7-036 Response to NH REP6-017 Scheme BCR and sustainable travel policies pp1-4

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001221-CPRE%20PDSY%20Response%20to%20NH%20REP6-017%20Answers%20to%20WQ2.pdf>

- REP8-033 written summary of hearings KB Compatibility of scheme with Government and local policies for sustainable travel and carbon emissions; summary of scheme impacts

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001364-CPRE%20PDSY%20-%20written%20summaries%20of%20oral%20submissions%20at%20hearings.pdf>

- REP8-045 Clarification following ISH 3 Item 2 policy and transport pp 1-2

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001365-CPRE%20PDSY%20-%20Other-%20submission%20for%20clarification%20following%20ISH3.pdf>

- REP10-013 comments on submissions for D9 Fixed cost function and masking pp1-3

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001475-CPRE%20PDSY%20-%20comments%20on%20submissions%20for%20Deadline%209.pdf>

Part 1: History of proposals and policies for the A628 corridor

The A57/A628/A616T between the M1 in South Yorkshire and the M67 in Greater Manchester is the only trunk route crossing the Southern Pennines. For more than 50 years the DfT and NH and their predecessor bodies have been attempting to address the issues on the route by increasing road capacity¹. To date road schemes have met with difficulties due to (i) the overarching transport policy agenda; (ii) piecemeal “out of context” development; and (iii) failure to plan strategically for both road and public transport (particularly rail) in the corridor. These are demonstrated by the 2007 collapse of the Mottram-Hollingworth-Tintwistle bypass public inquiry.

(i) The overarching agenda through those 50 years, has been to create a high standard all-purpose trans-Pennine route linking South Yorkshire and Greater Manchester. This was considered a vital component for successful urban regeneration on both sides of the Pennines². As transport policy changed, and it became understood that in many areas it was not possible to build a way out of congestion, the proposal for a motorway connecting the two was dismissed in the 1970s. There were also huge environmental issues in relation to damaging the National Park. Nevertheless, the M67 was constructed as a separate bypass of Denton and Hyde. The Stocksbridge bypass opened in 1988 and increased the strategic importance of the route and traffic flows on it. The current scheme with plans for the Hollingworth-Tintwistle bypass and dualling further east³ all reflect a continuing piecemeal approach.

(ii) Such piecemeal development, was rejected by the Government’s independent Advisory Committee on Trunk Road Assessment (SACTRA) in the 1980s⁴, because it avoids addressing the strategic impacts of the existing route and proposed upgrades. The A628T corridor even now threatens the integrity of the habitats and the special qualities of the Peak District National Park (PDNP). Plans for the Strategic Road Network (SRN) are required to avoid areas designated as National Parks, and go round them. The Peak District National Park Authority (PDNPA) has strong local plan policies that reflect this protection and seek reduction in traffic both within and through the area. Outside the Park, Greater Manchester and South Yorkshire both have targets based on Tyndall carbon budgets to reach net zero carbon by 2038 and 2040, respectively. In order to achieve these budgets Transport for Greater Manchester’s (TfGM) Transport Strategy and Right Mix ‘50:50’ policy aims for 50% of journeys by active travel and public transport by 2040, with a 17% reduction in car trips overall - a decrease in car trips of 6% for local neighbourhood journeys, 12% for the wider city region, 21% for trips connected to the regional centre and 7% for city-to-city journeys. These policies are not reflected in the A57 Link Roads’ development.

Piecemeal upgrades also avoid planning strategically for trans-Pennine travel between the Scottish border and the A52. Twelve miles to the north of the A628T corridor the M62 is designated part of the EU Trans-European Network (TEN) or Trans-Pennine Corridor with the M56, M180, and the north-south Trans-Pennine rail routes. There has been no attempt to reduce traffic impacts on the sensitive Pennine uplands by focusing trans-Pennine movements on the M62 corridor using a braided approach to road, rail and water. Instead, upgrades of the M62, the A66T and the A628T are all being developed at present.

(iii) The failure to plan strategically, and with respect for key environmental assets and environmental and societal impacts, has led to difficulties in progressing upgrades for the corridor. The 1970s motorway was rejected because of its impacts on the National Park. The failure of the 2007

¹ The Case for the Scheme - Summary

² Mottram Hollingworth and Tintwistle The need for a bypass, 1988, Tameside MBC, Derbyshire CC and High Peak BC

³ South Pennines Strategic Development Corridor, 2020, RIS2

⁴ See SACTRA Report on Urban Road Appraisal, 1986, also Environmental Impact 1992, Traffic Generation 1994.

Mottram-Hollingworth-Tintwistle bypass to proceed was due not only to the weight of objections but also to errors in the traffic modelling and its inability to reflect the new realities of transport policy. The inquiry was postponed to allow corrections to be made to the modelling but the public inquiry never re-convened. It finally closed nearly two years later, without another meeting, in March 2009.

In that context, developing and evaluating an option that fulfils the policy framework is essential. CPRE has been developing and promoting alternatives to major road building in this corridor since 2004. Its 2004 'Way to Go'⁵ proposals were well received but only a minority of them have been progressed. MTRU's⁶ 2005 appraisal of CPRE's proposed Peak District-wide lorry control system⁷ demonstrated its environmental benefits; in surveys it was the top solution chosen by local people⁸.

After the 2009 closure of the Mottram-Hollingworth-Tintwistle bypass inquiry, Tameside Council consulted on the Longdendale Integrated Transport Strategy⁹ (LITS) which included measures to improve conditions for walking, cycling and public transport use, as well as major road building. However it failed to receive central funding.

In 2014 MTRU developed for CPRE a package of travel demand management measures and Smarter Choices for consideration through the Trans-Pennine Routes Feasibility Study 2015¹⁰. These demonstrated strong benefits compared to road building and unambiguous evidence that they should undergo detailed appraisal. The rejection of these measures by HA is discussed further below in Part 2.

In 2020 CPRE undertook a broad on-line survey to collect views from both residents and visitors on the future of Longdendale and travel within it. This provided a long list of transport interventions that people wished to see. This was further developed through one-to-one interviews with residents and visitors to understand their specific travel experiences, and followed by an online professionally facilitated Green Travel Challenge to discuss the emerging measures. All this work has informed the final proposed package for Low Carbon Travel.

⁵ South Pennines Integrated Transport Strategy 'The Way to Go' - CPRE Peak District and South Yorkshire Branch, 2004. Measures included Lorry weight restrictions; revitalised main roads; 20mph zones; safe routes to school and travel planning; good quality cycle infrastructure and cycle training for all children; improved access to rail; bus lane on A628; Peak District- wide Quality Bus Contract with promotion and marketing; traffic calming and 30 mph through villages; Hope Valley line passing loop; regional rail card; road pricing in Greater Manchester.

⁶ <http://www.mtru.com/>

⁷ CPRE lorry control proposal on the A628 – Assessment by MTRU, 2005

⁸ Travel Survey, Alternative Proposals for Transport & Save Swallows Wood, 2006; Longdendale Integrated Transport Strategy, Public Consultation Report, Tameside MBC 2010 – the most supported measure to address congestion was an environmental weight restriction (89%) with the bypass coming second (81%)

<https://www.tameside.gov.uk/TrafficManagement/Longdendale-Integrated-Transport-Strategy>

⁹ <https://www.tameside.gov.uk/lits>

¹⁰ Final Report for the 2014 Trans-Pennine Routes Feasibility Study, incorporating the Interim Note of 31-7-2014 - Keith Buchan, Director of MTRU, 2014. Measures included HGV weight restriction; opportunities for local journeys using travel planning, new walking & cycling routes, car sharing, car clubs, raising travel awareness and providing information on rail and bus; enhancements to rail services; reallocation of road space to cyclists.

Part 2: Developing an alternative package - Low Carbon Travel for Longdendale and Glossopdale

2.1 Developing and testing Options

The development and testing of options is central to any scheme preparation and appraisal. This is embedded in both the earlier and the latest versions of the Treasury Green Book¹¹ and WebTAG¹². The normal approach is to identify objectives which the options seek to achieve, and problems which are to be solved. The two are obviously related.

We have used this approach to generate elements of an alternative package, linking them to problem solving and achieving objectives. It is not claimed that any proposal is perfect, but there are some which perform much better than others.

Did NH undertake an option assessment?

In the case of this DCO, NH claimed that the option assessment stage was delivered by the February 2015 report¹³ referred to in the HA/NH Environmental Statement¹⁴. NH confirmed that this document was the basis for their initial option assessment.

It is clear from the source documents that, even in 2015, the appraisal table lacked some key strategic environmental and social objectives, in particular reducing greenhouse gases and promoting Active Travel (Climate Change and Health)¹⁵.

While it could be argued that, even in 2015, these objectives were clearly identified in local and national Government policies, policy development since then has been in a clear direction – raising the importance of reducing carbon (and other pollutants) and promoting sustainable travel. Supporting the economy remains a key goal but has to work within policies for levelling up and greener growth.

It is also clear that the rejection of the original HGV control scheme and sustainable travel measures was on the basis of the former being difficult to deliver and the latter not having enough impact. Apart from that the HGV control scheme scored reasonably well even on the limited objectives used (see Annex 2).

¹¹ An update was available in Dec 2020 during the A57 Link Roads statutory consultation - <https://www.gov.uk/government/collections/the-green-book-and-accompanying-guidance-and-documents>

¹² <https://www.gov.uk/guidance/transport-analysis-guidance-tag>

¹³ Trans-Pennine Routes Feasibility Study Stage 1 Report February 2015
<https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports>

¹⁴ APP-060 A57 Link Roads TR010034 6.3 Environmental Statement Chapters 1-4 June 2021 <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-000155-6.3%20Environmental%20Statement%20Introductory%20Chapter%201-4%20Introductory%20Chapters.pdf>

¹⁵ The objectives did not include carbon emissions reduction, reducing congestion impacts on the wider urban area beyond the trunk route, or encouraging modal shift to more sustainable modes. They included:

Connectivity – improving the connectivity between Manchester and Sheffield

Environmental – avoiding unacceptable impacts on the natural environment and landscape in the Peak District National Park, and optimising environmental opportunities;

Societal – improving air quality, reducing noise impacts, and addressing levels of severance on the trans-Pennine routes in urban areas;

Capacity – reducing delays and queues and improving the performance of junctions on the routes

Resilience – improving resilience through reductions in the number of incidents and reduction of their impacts;

Safety – reductions in the number and impacts of accidents

It is also important to make the distinction between “feasible” and “deliverable”. HA agreed that the alternative package was feasible, i.e. deliverable in practical terms, but had some risks associated with it, for example objections to any TRO required and enforcement costs. The former is normal for any TRO, including those required as part of and subsequent to, this DCO. For the latter the HA judgement has clearly been overtaken by technologies such as ANPR¹⁶ which is now very widely used and an established tool in the transport planner’s toolbox. HA’s 2015 sifting of options is therefore doubly out of date.

In terms of core objectives used for assessment, the importance of reducing carbon emissions and a move to sustainable transport has grown, especially with the passing into law of carbon reduction targets which depend crucially on mode transfers. This is reflected in the most recent national and local policies, for example the DfT Transport Decarbonisation Plan¹⁷ (TDP) with walking and cycling 50% targets for 2030, and the TfGM “50-50” policy¹⁸ which has locally specific targets for sustainable travel from now to 2040.

This is a transformation in policy objectives and legal targets since 2015. While the objectives used for the initial option appraisal were in our view incorrectly drawn at the time, they are now completely out of date. We have no hesitation therefore in revisiting the question of whether this road scheme is the best option to achieve strategic or local objectives.

2.2 Solving problems

In terms of the problems and objectives for this scheme, we would amend the HA/NH list as follows. The key existing problems we consider should be addressed are:

- 1) High carbon emissions from existing traffic
- 2) Noise, air pollution and severance caused by existing traffic in local streets
- 3) Noise, air pollution, severance and landscape detriment from much of the same traffic in the Peak District National Park (PDNP)
- 4) Unreliable journey times
- 5) Poor local conditions for walking and cycling (with associated health disbenefits)
- 6) Delays to local buses
- 7) Long journey times on strategic transport links between Manchester and Sheffield

In relation to these the A57 Link Roads scheme has a strong negative score in relation to carbon - it adds nothing other than the external impact of transfer to electric vehicles and will discourage established local and national plans to transfer traffic to sustainable modes. This is not necessarily the case with all road schemes – the A57 happens to be located within the outer area of a major conurbation, next to an important national asset (PDNP) which produces its own locally generated traffic, especially visitors.

The road proposal has a mixed picture on local impacts (2 above) with increases and decreases, and has a negative impact on the National Park (3 above). Journey times were only given for sections of road rather than a representative number of actual journeys. In relation to 5) walking and cycling routes are fitted on to the new road using “walk with traffic” schemes which hold users in the middle of the carriageway so as not to interfere with the traffic stream and offer no direct

¹⁶ ANPR: Automatic Number Plate Recognition, used widely for traffic and speed limit enforcement on the strategic and local networks including congestion charging and air quality zones.

¹⁷ Decarbonising Transport, A Better, Greener Britain, DfT 2021
<https://www.gov.uk/government/publications/transport-decarbonisation-plan>

¹⁸ Greater Manchester Transport Strategy 2040 – ‘Right Mix’ Technical Note, TfGM January 2021
<https://democracy.greatermanchester-ca.gov.uk/documents/s12589/GMTS%202040%20-%20Appendix%201%20Right%20Mix%20Technical%20Note.pdf>

crossing¹⁹. If used at all, they will encourage risky behaviour from trying to beat the traffic cycle which could otherwise cause crossing times up to 2 minutes. No information is available on predicted walking and cycling use of these routes or route timings. Several footpaths are severed by the new road and an associated large scale junction.

Strategic route timings are predicted to get longer in future years compared to the present day, but are claimed to be less worse with the scheme. However this conclusion is subject to the criticism of the modelling in another section of this report (Part 3). Basically the impact of the traffic changes on the road network in Manchester are screened out by the use of a buffer network and “masking”. This is referred to by NH as removing “model noise”. A more technically detailed explanation of this screening is given in REP10-013²⁰.

It is important to emphasise that a scheme which makes road traffic faster will make such travel more attractive. The variable demand model is supposed to represent this, although it does not do so for freight. Neither does it identify exactly how this will change the balance of competition between sustainable modes and motorised vehicles across the area. This is important because it is traffic in these areas which is subject to the key Government policies to reduce carbon, for example as set out in the DfT Transport Decarbonisation Plan (TDP) and the TfGM “50-50” policy referred to previously. In this specific case the majority of the benefits appear to be to traffic in the local area - trips entirely within Greater Manchester represent 55% of total benefits.

Some of the elements of this package involve the concept of “coherence” in terms of creating an area where public realm and traffic control work together, and a series of consistent signs, planters, seating and crossings gain from a consistent and clearly signposted approach. This in turn moderates driver behaviour and improves safety. The importance of this approach is found, for example in the DfT guidance on walking and cycling networks²¹.

2.3 Overall approach: building a package

Before setting out some more detailed proposals to the high level problems listed above a summary of the approach is set out below.

- 1) Reduce pressure on the system overall through traffic reduction and dispersal
- 2) Reduce the number of the most environmentally damaging vehicles on the local road network
- 3) Improve safety on the whole A628 PDNP route by reducing speed limits
 - 50 mph through the Park
 - 20 mph from Tintwistle to Hyde Road
- 4) Encourage more walking for local journeys and increase footfall in all the settlements at the Western end of the A628 by:
 - more frequent protected crossings

¹⁹ There are exceptions at the major M67 roundabout: All pedestrian phases are ‘walk with traffic’ apart from 3 linked to the traffic timings and requiring demand actuation (push button) at:

eastbound exit onto Hyde Rd; southbound exit onto Stockport Rd; westbound exit onto Mottram Rd

²⁰ REP10-013 comments on submissions for D9 Fixed cost function and masking pp1-3

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001475-CPRE%20PDSY%20-%20comments%20on%20submissions%20for%20Deadline%209.pdf>

²¹ Local Walking and Cycling Infrastructure Plans, Guidance for Local Authorities, DfT April 2017

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908535/cycling-walking-infrastructure-technical-guidance-document.pdf

- reduced speeds
- public realm improvements and “signals” to motorised users
- 5) Use junction reconfiguration, signalisation and revised signalisation to
 - control remaining traffic
 - introduce greater priority for buses, pedestrians and cyclists
- 6) Undertake a travel planning programme locally which would:
 - inform people about existing alternatives to car use
 - identify barriers to using alternatives
 - identify improved provision on the basis of the travel planning programme
 - implement improvements, monitor and modify
- 7) Improve sustainable North/South links as well as East/West

2.4 Summary Package: Low Carbon Travel for Longdendale and Glossopdale

Our alternative package would comprise a number of new combined pedestrian signals/bus stops and gates on the A628 route through the Longdendale settlements, linked to existing paths and developments

- 1) Public realm improvements to create a coherent network and encourage footfall
- 2) Enlarged junction at Woolley Bridge to include a priority entry lane for buses and cyclists from the A57.
- 3) A comprehensive travel plan for Longdendale, beginning with a travel planning programme including both workplaces and residential areas (these need different techniques)
- 4) Use the travel planning programme to:
 - define place to place local cycle and walking routes (not necessarily the same)
 - set up new or improved bus services with initial incentives to try them
 - better integrate rail and bus services locally
 - improve links to TfGM networks for public transport and cycling
 - pilot bike and e-bike deliveries from local shops
 - create financial incentives to overcome barriers and provide longer term support (particularly useful for workplace plans encouraging public transport and cycling)
- 6) Institute an HGV control scheme for the National Park to remove through HGVs. This would need an area based approach and have two options: restricting only the heaviest (over 24 tonnes) or all HGVs (over 7.5 tonnes) except for access.
- 7) Link new and existing traffic signals to a centralised area wide controller and the TfGM system.

2.5 Pedestrians and buses: improving access and controlling traffic

The need to improve public transport, walking and cycling in the area is well established, for example in the Tameside LITS study of 2010. This underwent extensive consultation and the results helped to inform this package. Some helpful work on what the bus improvements might

look like can be found in the summary and consultation documents²². A more detailed package would require the supply of local data which was not available from NH.

One of the points of the proposed travel planning programme is to reveal demand for facilities and refine services and infrastructure improvements rather than imposing solutions. This means they are more likely to be used (there are many workplace travel plan examples). However, some useful suggestions were gathered in the public consultation exercises, both for the original LITS in 2009 and through the CPRE Green Travel Challenge²³ consultation in October 2021.

The findings from the latter have assisted in preparing this package and the Green Travel Challenge report, which was submitted to the Examination, should be considered alongside it. In terms of possible elements of the package all authorities were invited to the consultation and we have had a useful follow up meeting with the PDNPA. The alternatives need to be co-ordinated with PDNPA's sustainable travel initiatives. These in turn are another relevant policy since they influence traffic flowing into the study area (and are part of the NH Area of Detailed Modelling).

The approach to pedestrian crossings is to provide more of them, both to encourage walking and also to create easy access to buses. A full review would be needed but initial work on the ground (including analysis of existing demand points and bus stops) and the responses from the consultation have been used to show how this would work. It takes full account of the need for coherence, and the other recommendations in DfT guidance. This states that walking (and cycling) should have "five core design outcomes":

- attractiveness
- comfort
- directness
- safety
- coherence

The package addresses all of these issues directly, whereas the proposed A57 Link Roads scheme essentially relocates them. The list of improvements in the guide is in Annex 1.

Overall on the 3 mile section of road between Tintwistle and Hyde Road there are currently 7 sets of signals of which 4 are pedestrian crossings. Four new sites have been identified as shown on the attached map. The photo below of an existing crossing in Hollingworth on the A628 shows the opportunities for also improving the existing facilities, for example through replacing guard rails and using coloured road surfacing and planters. The intention here is not just to create the improved crossings, but by having a series of them, properly integrated with public realm improvements, a sense is created in drivers that this is not an area where traffic alone dominates – there is a balance. Figure 2.2 below shows a first draft of sites for crossings²⁴. All of these are associated with footpaths, local residential settlements and bus stops. Some of the routes to the latter via the crossings will also need items such as improved lighting.

²² See <https://www.tameside.gov.uk/lits/summary>

²³ REP2-071 <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010034/TR010034-000842-CPRE%20PDSY%20-%20Other-%20separate%20report%20accompanying%20written%20rep.pdf> and <https://www.cprepsy.org.uk/news/car-free-longdendale-update/> This was conducted by independent specialist consultants and the Consultation Report published in November 2021

²⁴ Please note: a crossing on the A57 for the Trans-Pennine Trail and a bus gate in Old Glossop are not shown



Figure 2.1 Existing pedestrian crossing on Market Street, Hollingworth which could be improved.



Figure 2.2

New signalised crossing



Existing signals no pedestrian phase currently



Existing signals



Please note: a crossing on the A57 for the Trans-Pennine Trail and a bus gate in Old Glossop are not shown

New bus priority/signalisation



2.6 Bus service improvements: an integrated approach

While improving conditions for walking as well as access to bus stops is one part of the picture, the package proposes improvements to:

- the stops and waiting areas
- the buses themselves
- service frequency and reliability.

Proposals for stop and shelter improvements were made by Tameside in its LITS Strategy from 2010. In this package the idea would be to co-ordinate with and reinforce the public realm improvements and driver behaviour indicators. Consistent signing would be used to emphasise that it is a local community and recreational area, including the theme of Longdendale's special qualities and connection to the National Park (e.g. as a "Gateway"). Such behavioural approaches are increasingly common and understood, particularly where space is shared between traffic and local movement on foot. The modern understanding that walking is not just a mode of transport, just without wheels, but an opportunity for social interaction and creating demand for local facilities such as retail is the basis for some of the proposals in the Low Carbon Travel for Longdendale and Glossopdale.

In terms of external air quality and internal comfort, buses should be replaced as soon as possible by electric versions with air circulation/conditioning and WiFi. However, the package also includes improved services. Using the data from NH, and the feedback from the consultation, both on the original LITS and the Green Travel Challenge conducted in 2021 the following is an indicative package:

- the purchase and operation of three new electric buses to raise the profile of bus services and allow for increased services
- one option could be reviving part of the X57 Glossop to Manchester to provide an hourly service (2 new buses). The A57 south of Hollingsworth and Hadfield has significant employment areas and a settlement at Gamesley. The latter has an hourly hail and ride service (no evenings) but much of it is less than the recommended minimum for bus stop access. This would enable a guaranteed interchange between local buses and the X57, for example from the existing 20 minute service on the 237. The package would enable much faster links between Tintwistle and Manchester destinations The X57 used to run from Sheffield, but was poorly used. It is not clear why this was, given that the NH scheme is predicated on a lack of links between the two cities.
- a new local hopper type service serving Tintwistle, Hadfield and Glossop (including South of the centre). This would be co-ordinated with the X57 so that some of the frequent stops for this service in Glossop could be avoided. This could be used to reduce the X57 journey time as an express service.
- A new junction layout at Woolley Bridge to widen access inbound from the A57 allowing for a bus and cycle approach lane and a priority entry. The junction should also be signalised. A picture of the junction approach which would be widened and be signalised to include a bus/cycle priority is shown as Figure 2.3 below. The existing bus stop would be in the proposed new priority lane.
- Bus gates at selected pedestrian crossings would have the dual function of breaking up and distributing any queuing traffic and improving bus journey times. These would be directional, with the ones at the eastern end having westbound priority

and vice versa. The use of gates instead of full length bus lanes is one which was pioneered in London but is now widely used and has three main advantages:

- Less disruption to general traffic of all types
- Lower space requirements and better compliance
- Easier to integrate with other functions, in particular pedestrian and cycling crossings

Figure 2.3 Woolley Bridge junction showing single file approach and current bus stop



*Note: Woolley Bridge is to the left out of view.
Photo data: MTRU, August 26th 2021 15:47.*

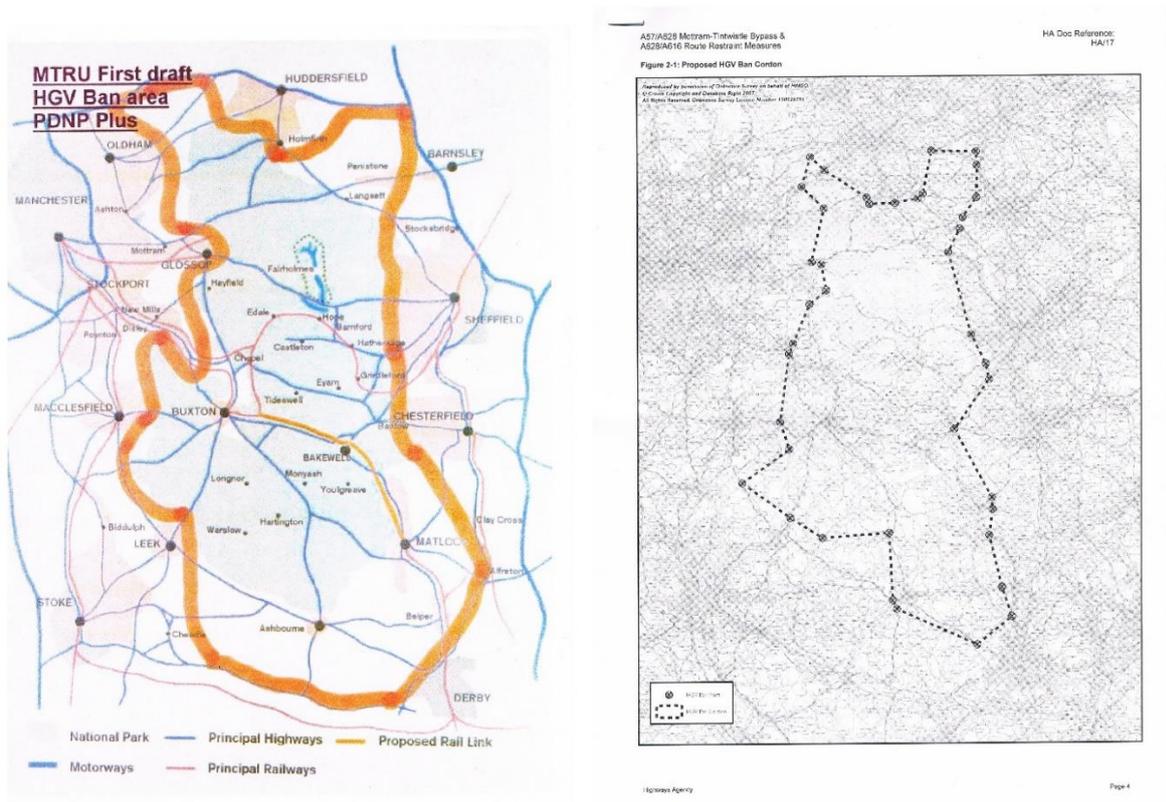
2.7 HGV control scheme

Introduction

An HGV control scheme on vehicles over 7.5 tonnes was first proposed by MTRU and included in the HA Strategic Assessment in 2015. An indicative map was produced, then translated into a detailed map suitable for the transport model. This included site visits to the proposed sign locations for costing purposes.

These two maps are shown in Figure 2.4 below.

Figure 2.4: HGV control scheme initial area proposal (indicative map left; detailed map right)



Access restrictions such as this are widespread and a local example from Old Glossop is shown below.

Figure 2.5: Example of local access restriction



Photo data: MTRU, August 27th 2021, 09:39

One of the key issues in 2015 was enforcement and since then there has been considerable progress in methodology, in particular use of cameras and number plate recognition. A recent example of an HGV scheme is the London Low Emission Zone (LEZ) which covers the whole of the Metropolitan area. This applies to all HGVs over 3.5 tonnes and is more stringent than many HGV restrictions which operate at 7.5 tonnes. Examples of the latter can be found locally, for example in Old Glossop (see Figure 2.5). The original CPRE proposal was for an HGV access only restriction but in developing such an option, and as part of any further consultation, other options should be considered. Additional work has indicated that an even simpler control would achieve most of the benefits.

A good example would be a restriction on the heaviest and most damaging vehicles only: for example those with four or more axles. These are basically over 32 tonnes and include most articulated HGVs. Analysis of the traffic flows at Chapel Brow and Woodhead from the DfT dataset shows how these are the dominant HGV type. Because the manual counts were not conducted in the same year, an extra check was done for Woodhead.

Table 2.1: HGVs and traffic A628

	All traffic	HGVs (%)	Large HGVs (%)
Chapel Brow 2019 Manual count	11676	1423 (12%)	1051 (9%)
Woodhead 2016 Manual count	12592	1537 (12%)	1137 (9%)
Woodhead 2019 Estimated	12957	1621 (12%)	1181 (9%)

Source: DfT at roadtraffic.dft.gov.uk

External costs and HGVs

One issue in assessing the alternatives is the extra costs of diverting HGVs from the PDNP. It is important to understand that HGVs, especially the largest HGVs, have a scale of environmental, infrastructure and congestion impact which is hugely greater than cars. The most extreme example is road surface damage, and thus road maintenance, which is about 180,000 times greater for the heaviest articulated HGV than a car²⁵. Noise, vibration, visual intrusion, emissions and particulates are all greater, if not to the same extent. All of these effects (known to transport economists as external costs) are well known and documented.

Purpose built roads, such as motorways, are designed to minimise these external costs. The DfT data on external costs, in the TAG Data Book, sets out values for such impacts, to be used for broad brush assessment. Although the diversion of through traffic of HGVs from the PDNP is likely to cause an increase in distance, this will be at a lower rate of external cost. In this case there would likely be an overall reduction in external costs.

This is not the whole picture. Demand for using HGVs is directly related to the cost. Such an effect is included by NH in their modelling for cars, but not for HGVs. Use of the latter is in fact much more sensitive to cost than car use – this is because there are a variety of options to reduce HGV travel including use of other modes, time switching, use of alternative depots

²⁵ This is because damage rises rapidly with axle weight, usually calculated using the 4th power law

and modifying logistics systems to minimise external impacts. In addition, HGVs are significantly underutilised - they are in fact completely empty²⁶ for 28% of their travel.

There is sometimes some confusion between the amount of goods by weight which are delivered (usually referred to as “tonnes lifted”) and the distances travelled by road in order to deliver them. The total weight of goods delivered, for example goods from ports to depots, is much less sensitive to price than HGV travel. This is because the options for the way the goods are transported are many and diverse (see above), including the obvious one of their current lack of efficient use of vehicle capacity.

DfT recommends using the TAG Data Book for broad brush assessment of external costs and these data are the same as those used for detailed appraisal, for example carbon values. Using this it is possible to calculate the external cost impact of the control scheme at the strategic level. The key factor is that external costs will be lower on motorways than A roads. This is fairly self-evident but specific data is available and this is illustrated in the table below which shows the significantly lower accident rates per mile for HGVs on motorways compared to non-built up A roads. In terms of HGV distance travelled, there are twice the number of road casualties, 3.3 times the number of killed and seriously injured and 4.4 times the number of fatal casualties, on non-built up A roads compared to motorways.

Table 2.2

Ratio of casualties on non-built up A Roads compared to Motorways		
Killed	Killed and seriously injured	All severities
4.4	3.3	2.1

Source: DfT tables RAS 30017 and TRA 0104

Initial assessments were that the maximum increase in journey length would be 32 miles replacing the A628 with the M1/M62. This will not apply to all trips but provides an upper bound. Using similarly congested networks, replacing travel on A roads with motorway travel results in a substantial external cost net benefit. While this point was made at the Examination, a full comparison with additional operating costs was held back pending further data from NH on the trip length and route of HGVs on the A628 – a “select link analysis” – at Woodhead. This was received and confirmed the original estimate for through traffic, but the other data requested was not available. In this case, and subsequent to the Examination, we have prepared an assessment based on what data is available and this is covered in Part 2.10 below.

In terms of traffic relief, and therefore congestion, HGVs clearly take up significantly more road space than cars. Most traffic assessments and modelling uses the passenger car unit (pcu) as its basis for comparison. The average for all HGVs is usually taken as 2.4 pcu or above (depending on specifics such as junction delays). However, this average conceals differences between smaller HGVs and heavy articulated vehicles which are rated at 2.9 pcu and above.

In this case, where there are high proportions of the heaviest HGVs, analysis shows that a majority of the congestion benefits from the control scheme would come from removing the

²⁶ DfT freight statistics Table FRS 0125 <https://www.gov.uk/government/statistical-data-sets/tsgb04-freight>

heaviest vehicles. This allows for a proportion which would require local access estimated from the flow differences at the count sites (10%).

Based on the opening year flows supplied by NH²⁷ a restriction on HGVs, using a 2.4 pcu value, would result in a traffic reduction of at least 17.3%. Removing only the heaviest (about 75% of the total) but applying the higher pcu value results in a traffic reduction of at least 15.4%. The remaining car traffic is subject to the sustainable travel package and the two results combined to provide an overall reduction. Again a more detailed analysis using standard cost benefit methods, and the available data, is provided in Part 2.10.

The initial figures have been public since October 2021 and were used in the CPRE Green Travel Challenge consultation. The slides from that, which summarise the first draft of the package and the impacts, are part of the Green Travel Challenge report²⁸ which should be read in conjunction with this more detailed analysis. The individual elements have been developed since the consultation and the overall reduction figures have increased marginally by around 1%.

2.8 Potential overall impact of Low Carbon Travel for Longdendale and Glossopdale

An initial assessment of local traffic which might be affected by the sustainable travel package was made from the flow data between the cross Pennine routes and the local flows at Mottram. More detailed car trip matrices were supplied by NH towards the end of the Examination. Local data was extracted from them to improve the local traffic assumptions used for the calculations. It is difficult to apply data to 2025 because the DfT TDP uses 2030 and TfGM use 2040 as target dates. Using TfGM assumptions, 2040 local traffic levels could reduce by about 17% but the impact of sustainable policies on the rest of the traffic is an unknown. Even assuming there is no impact from such policies (itself a limiting case) traffic reduction overall would be about half that, i.e. 8-9%. A more detailed analysis was difficult due to the lack of data from NH. However, national data and as much local data as possible were used to refine the impact assessment of the alternatives for this report.

Using the anticipated TfGM Right Mix policy impact on traffic reductions as a proxy for the impact of Low Carbon Travel sustainable transport and combining this with the HGV control scheme would lead to the traffic reductions on the A57 at Mottram Moor shown in Table 2.3. Figures are given for Low Carbon Travel with all HGVs subject to a weight restriction ie 7.5tonnes and over, and with only the heaviest HGVs (articulated) subject to a weight restriction. The differences between them are marginal as the heaviest HGVs predominate but this needs to be confirmed with better HGV data.

Table 2.3

	Gradual TfGM 2025	Gradual TfGM 2040	DfT TDP 2030	Updated DfT TDP 2030
Package + all HGV control	-21.3%	-24.1%	-28.2%	-28.6%
Package + heaviest HGV	-19.5%	-22.3%	-26.4%	-27.7%

²⁷ APP-151 Appendix 2.1 of NH Document 6.5, the Environmental Statement, Traffic Data <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-000234-6.5%20Environmental%20Statement%20Appendix%202.1%20Traffic%20data.pdf>

²⁸

2.9 Costs of Low Carbon Travel for Longdendale and Glossopdale

In seeking to move this package forwards some indicative capital costs have been allocated. The least certain aspects are the two major junctions: the M67 and Woolley Bridge. The latter is moderately sized while the M67 needs further detailed design work and is not included in the estimate below. The package has been costed at £9.7million at today's prices including optimism bias at 44%²⁹. This is important because construction costs have some uncertainty at the moment.

Table 2.4: Low Carbon Travel for Longdendale and Glossopdale cost estimates

• Woolley Lane junction signalisation and provision of bus/cycle priority entry	£1,000,000*
• Three new signalised pedestrian crossings	£450,000*
• One new pedestrian crossing with bus gate	£250,000*
• One bus gate at existing crossing	£150,000
• Two additional pedestrian phases at existing signals	£150,000*
• Three new electric buses	£1,000,000
• Travel planning programme initial survey and planning	£500,000*
• Travel plan start up incentives 3 years @ £350k pa	£1,050,000*
• Walking route improvements (50 kms @ £5k per km)	£250,000*
• Cycling improvements (includes 50 kms plus parking and other incentives)	£500,000*
• 20 mph speed limit plus public realm (20 kms @ £10k/km)	£200,000*
• HGV signs including advance warning on motorways ³⁰	£1,200,000
• Total	£6,700,000
• Plus Optimism Bias 44%	£9,650,000

The items included in the walk and cycle part of the package are indicated with a *. Travel planning has been split 50-50 between walk/cycle and public transport, as has the cost of the Woolley Bridge signals including bus/cycle priority. This enables the walk and cycle elements to be subject to a cost benefit assessment on the same basis as the proposed A57 road scheme using the DfT's Active Mode Appraisal Tool (AMAT). Details are given in Part 2.10 below on package assessment. The other elements (HGV control scheme and public transport) are also subject to assessment using established DfT cost benefit parameters in Part 2.10.

As noted above, in regard to the cost table it is important to note that no additional costs are given for signalisation of the M67 roundabout. This could be modest if undertaken within the existing layout, but would become more expensive if more construction work was needed, of the order of £5million. NH said they would not supply details of the roundabout

²⁹ See TAG Unit A 1.2 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1102786/tag-unit-a1-2-scheme-costs.pdf Optimism bias is the demonstrated systematic tendency for appraisers to be overly optimistic about key parameters. Optimism bias of 44% is the recommended highest level adjustment for standard civil engineering projects - see Supplementary Green Book Guidance Table 1 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/191507/Optimism_bias.pdf

³⁰ In practise we would propose an engagement with freight users and operators to minimise costs and maximise benefits – analogous to travel planning for personal travel. The costs and benefits are not included here due to lack of data on HGV use. The benefits should however easily outweigh the costs.

costs separate from the rest of the scheme. In any case the layout with the sustainable package would not need as much major change as with the road scheme. It also seems very likely that the roundabout will have to be signalised as part of new development conditions so may not need funding as part of this package. While no costs have been calculated for the M67 works, there are also no benefits included in the assessment.

2.10 Low Carbon Travel for Longdendale and Glossopdale Cost Benefit Assessment

Achieving objectives

As we set out in Part 2.1, any transport scheme should have a full option development process, when overall objectives are assessed. These strategic quality of life objectives should continue to guide scheme development and appraisal throughout. Our analysis shows that this scheme would in fact undermine key objectives such as improving safety and reducing carbon emissions. The latter is considered in detail in Part 5 of this report. If full account had been taken of the key objectives, this scheme should never have passed its Strategic Case assessment (as mandated by the Treasury Green Book). The Green Book Review set out the issue in some detail and suggested remedial actions. Despite this, considerable weight is given to the next stage of appraisal, the detailed Economic Case, and in particular the production of a value for money figure as part of it – the benefit to cost ratio or BCR. Useful and more detailed data is usually collected for the Economic Case, and measuring costs and benefits for alternative proposals can be undertaken in a similar manner to that for the road scheme.

The traditional cost benefit approach and BCR

The proposed A57 Link Roads scheme has undergone a cost benefit analysis which claims to conform to DfT guidance. Part 3 of this report considers how in our view this claim is not justified, for example in the lack of traffic reduction in the urban areas adjacent to the proposed scheme, the lack of option assessment and the failure to deal with new policy and uncertainty.

As part of this traditional cost benefit approach a monetised BCR was produced for the A57 Link Roads scheme. The limits of monetisation are well known and not detailed here. The limits of the BCR are also well known and described in DfT guidance. However, to show the value for money of the proposed alternative we have undertaken a cost benefit analysis using the available data and this section presents its results. Throughout we have used the same DfT guidance and monetisation values, in particular in the DfT TAG Data Book. The aim has been to produce an assessment which can reasonably be compared to that for the A57 Link Roads. We have also drawn attention to the areas of uncertainty, as professional practice and DfT guidance require. As will be seen, much of the uncertainty is the result of inadequate NH data so is also present in their assessment but unacknowledged. This is the first issue considered below.

Making the best of the data

During the DCO examination it became clear that there was a lack of walking and cycling data or of any estimates for future use. The same was true for public transport – despite claims that it was included in the NH modelling. In fact there was some limited rail data which at the time of writing seems to have been used in a different and undisclosed high level model. Although NH claimed their modelling included variable demand, this was for car only, and was severely limited by the lack of sustainable personal travel modes. It completely excluded heavy goods vehicles. It was also clear that no specific account was taken of the

policies in the DfT TDP which aspires to a move to sustainable travel modes and away from car traffic.

Despite this surprising lack of data, it has been possible to produce assessments for the following:

- walking and cycling elements of the alternative package using DfT standard software
- costs and benefits of public transport improvements, but excluding time benefits to existing passengers (because of the inadequate NH data and model)
- estimates of the costs and benefits to operators and the public of the HGV control element using figures from the DfT Data Book (which uses the same parameters as used for all DfT appraisal)

For personal travel, the local car traffic at Mottram was estimated from the sector data supplied by NH and mode transfer assumptions were applied from the details in the Climate Change Committee's (CCC) 6th Budget. This is what underpins the DfT TDP. Technical work pre-dating the DfT TDP by TfGM for their "50-50" strategy was also used to check the existing programmes to promote sustainable travel.

For goods vehicles, the amount of through traffic was obtained from NH but there was no categorisation between rigid and articulated HGVs, nor between smaller and larger HGVs. As set out earlier in the traffic impacts, local DfT count data on the A628 was used to assess the balance between articulated and rigid – about 75% were articulated, higher than national averages. Average HGV trip lengths and categories from DfT were used since specific data was again not available from NH. Fine tuning the control scheme to cover articulated HGVs only would reduce its negative impacts since there appear to be a small number of lighter HGVs with much lower disbenefits and a higher likelihood of needing local access. However the current lack of origin and destination (O&D) data by HGV type (or detailed O&D) makes this difficult. This should be remedied urgently bearing in mind its important role in the NH appraisal.

Further details of each approach are set out below, starting with walking and cycling.

Walking and Cycling

The figures from the CCC provided a high and low estimate for walking and cycling use. It should be noted there is some interplay between these modes and public transport, particularly bus and cycle. There was not enough data from NH to assess this. Again this is rather surprising.

Obviously the creation of new walking and cycling routes is entirely in line with TfGM, local authority and Government policy. The reality of this is evidenced by the development and growth of the TfGM Bee Active network³¹. The original 2018 TfGM vision for the Bee Network was a 10-year, £1.5 billion plan to create 1,800 miles of routes and 2,400 new crossings connecting every neighbourhood, school, high street and public transport hub in the city-region. The forecasts for Low Carbon Travel are based on the overall CCC averages and do not take account of any enhanced effects from the Bee Network.

These figures were used as inputs to the DfT Active Mode Appraisal Tool (AMAT). This is the standard method for appraising such schemes and is in widespread use. MTRU has used it for a number of assessments, including some for National Park Authorities. The detailed assumptions and results are in Annex 3 (taken from REP4-016) but one important one is that

³¹ See <https://beeactive.tfgm.com/bee-network-vision/>

the appraisal runs from 2023 up to the net zero end date of 2050 which is when the CCC forecasts also stop.

The results are as follows:

Table 2.5: Key outputs from AMAT

	Low CCC	Central	High CCC
Number of new users 2025	700	840	980
Rate of growth	5.5%	6.1%	6.7%
BCR	5.34	7.98	10.21

New users calculated from DfT TDP and TfGM 50-50 policies

In addition to the package costs in Table 2.4 there is one difference in that an additional ongoing sum of £100,000 per year up to 2050 has been added to the Low forecast, and £50,000 to the High and Central forecast. This is intended to provide sensitivity testing. A variation in the appraisal period, which would normally be done as a sensitivity test, is not required since the appraisal was run up to the specific end date for the net zero policy (2050).

In all cases the optimism bias was raised from the AMAT standard 15% to 44% as in our original submission³².

In other respects the inputs to the capital side used the list in Table 2.4 above, which were circulated for comment to NH and local authorities during the examination.

Public transport: buses

Undertaking the assessment of public transport was more complex, with very little data from NH and none on bus use. Local checks produced a more up to date picture of available routes and frequencies than the NH data. Because the position on rail was not finally clarified at the Examination, proposals have not been included for the package. There would obviously be costs and benefits from any rail enhancements in addition to bus but there was insufficient clarity on how rail had been treated in the NH modelling to add this to the package. In practise a holistic public transport package would be needed and should achieve even better value for money.

On the bus side there were several elements. First were the TfGM, DfT and CCC high level assessments, these were supplemented by analysis of local routes and potential origins and destinations. This led to an assessment of the scale of passenger use and the number of new buses and size required. The proposal is for 3 new electric buses which can carry about 40 passengers each.

It should be noted that the most effective way of increasing bus use is through engagement with users, in particular through travel planning. The exact nature of the routes offered should reflect the work done in the travel plan. The expenditure for this is split between the bus part of the package and the walking/cycling part. This makes the proposal somewhat

³² REP2-070 Alternatives first draft – see REP12-032 for corrected Table on page 15

REP2-070 <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010034/TR010034-000857-CPRE%20PDSY%20-%20Other-%20report%20to%20accompany%20CPRE%20written%20rep.pdf>

different from a traditional service by service approach looking at existing local demand. The end result should be services which are more closely aligned to what people will use. We have not used an enhanced forecast for this overall but do assume that a slightly higher proportion of new bus users will switch from car. The normal figure is 3 in 10, we have used 5 in 10, but have undertaken a test with the national figure as part of the assumptions for the Low forecast.

We have applied our predictions for increased public transport use to the proposed service levels with forecasts for peaks, interpeak and evening. This produces an average daily bus occupancy which can be checked against national figures. Our prediction is for a weighted average of 12, varying between 20 in the morning peak and 4 in the evening. This compares with the national figure of 10.7 for England outside London. While the low fares and travel planning should at least achieve 12, we have also done a test at 10.7 by using this reduction for the Low forecast.

There is some interplay between cycle and bus options but the level of data available precludes any detailed work on this. In the overall package assessment at the end of this section, this effect will be diminished but not completely eliminated.

One benefit is the removal of external costs from the road network as car drivers switch to public transport. This is used in all such appraisals and we have used the average for A roads from the DfT's TAG Data Book. This may well underestimate the impact since the Mottram stretch, although short, is so congested and polluted.

Because the exact routeing of the bus services has not been defined and there is insufficient data on existing services, the benefits from the bus priority and traffic reductions to existing bus passengers are not included in the bus benefits. This is an omission from the benefits which should be significant but is simply beyond the data available.

On operating costs we used two sources: one derived from DfT standard equations (Data Book Table 1.3.14), the other simply used an average per passenger from national data. The latter was higher and the former did not include charging costs so the national figure was used.

For fares we have used the TfGM standard figure of £2, discounted as with all other current costs to 2010 prices for the appraisal. In practice, this will be subsidised for the passengers as part of the incentives in the travel plan package.

There is a remaining benefit to be calculated: the social value of trips made on the new services which are not due to modal shift from car. The TAG Data book gives an average figure and we have used one for those with concessionary passes (the lowest). We have also used the DfT average bus trip generation proportion of 21.

The results of the appraisal and key elements are shown below:

Table 2.6: Key appraisal elements

	Low	Central	High
Number of passengers 2025	2101	2356	2612
Car transfer (car drivers)	630	1178	1306
External costs saved per day (Average A road)	£1058	£1978	£3079
Operating costs less fares per day (no capital)	-£37	£762	£844
Average car trip length miles	5	5	8.4
Value discounted over 10 years	£4.838million	£7.227million	£12.481million
Capital costs	£1.968million	£1.968million	£1.968million
BCR	2.46	3.67	6.34

*All Costs and benefits in £2010,
External costs are for 2025 from TAG data book*

We have tried to test the robustness of the appraisal for this element of the package by combining a number of pessimistic assumptions in the Low column. In addition the cost of the travel planning programme has a major impact on the BCR, and represents about a third of the £1.968million total.

Despite this, we do not consider this cost benefit assessment as definitive and as reliable as the one for walking and cycling. Without better local data there are a few costs and benefits missing, although we consider that on balance the impact would be to improve the BCR. In particular there will be significant benefits to existing bus travellers from new priority and from the reduction in and improved management of traffic, in particular making bus journeys faster and more reliable.

HGV control scheme costs and benefits

At our request NH were able to supply some additional data on HGV flows on the A628. However this revealed a lack of detail in two crucial aspects. First there was no distinction within the HGV category between the heaviest 44 tonne gross vehicle weight (gvw) and the lighter rigid, for example 7.5 tonnes gvw. Secondly there was no detailed O&D information other than at the broad sector level. This meant that journey information such as trip lengths or commodity were not available. However data was sufficient to confirm our original estimate from the count data that longer distance HGVs passing through the area were about 90% of total HGV flows. These vehicles were the subject of the MTRU proposed access only HGV control system which does not affect local goods vehicle traffic.

The first observation is that this lack of detail in the NH data is in itself surprising given that HGV flows on the A628 are such a major and obvious problem. There has clearly been a lack of analysis of this issue, even at this basic level. While the generation of extra car traffic

caused by the scheme has been addressed (albeit only in part as became apparent at the Examination) no such exercise was carried out for HGVs. This is often omitted where car flows are the dominant component of the problem being addressed and in the economic assessment. This is not the case for the proposed A57 Link Roads and a more thorough HGV assessment should have been undertaken.

A key reason for this is that HGV traffic is far more sensitive to changes in cost than car traffic. The amount of goods transported is not very sensitive, but the distances travelled and the mode used is very much so. This is because there are many behavioural options open for HGV transport in relation to cost increases:

- more efficient use of vehicles
- changing choice of depot to reduce vehicle kilometres
- changing mode – rail is particularly competitive for unitised goods such as containers on the largest HGVs.

Similar changes happen in reverse – for example logistics systems will prioritise efficiency to a greater or lesser degree according to transport cost.

Sensitivity is usually measured as an elasticity value. A value of one means that all the cost change is absorbed by behavioural change. In the case of HGVs, this varies by commodity and trip length but overall an elasticity value of 0.9 is widely accepted, including by DfT³³.

Given the limited data we have not calculated how much extra HGV traffic would be generated as a result of the scheme. This should have been done by NH as part of their variable demand work which they submitted to the Examination and is, in our view, a major omission.

For the MTRU control scheme we consider it helpful to give an estimate of the cost changes in the same way that the economics table for the A57 Link Roads has been approached, including an allowance for changes in HGV behaviour. This is possible because the additional distance involved in transferring HGV traffic to the motorway network away from the A628 can be measured. This will be a maximum but given the lack of O&D data for HGVs in the National Park this would provide a fair working basis for a calculation.

There are three steps to calculating the change in cost. The first is the external costs such as carbon emissions, pollution, accidents and congestion. These are significantly lower on motorways than A roads but vary according to level of congestion. The DfT Data Book (used for appraisals) has 5 different levels of congestion. For this analysis we have used Level 4 (second highest) for both A628 and the alternative motorway route. It is clear that despite the extra distance the external costs are so much lower on the motorway that the diversion creates significant cost savings.

On the external cost values used, they will clearly change over time. It should also be noted that, since average figures have been used, there will be a major underestimate of the benefits to the National Park in terms of landscape and visual intrusion, as well as journey quality for all users, including those travelling by car.

Of course this does not account for the internal HGV costs – i.e. the cost of extra driver time and vehicle operations including fuel. These will increase and again the DfT standard

³³ See: *Tax Information and Impact Note for Heavy Goods Vehicle charging proposals*, DfT October 2012 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/232294/hgv-charging-tax-information.pdf

equations are published in the TAG Data Book and have been used for this indicative analysis.

For the time costs we have used an average extra time, calculated by running Googlemaps for the alternative route over different times of day and days of the week. For the other operating costs we have used the change in distance and average speed, the latter using the same Googlemaps data.

Finally we have considered the variable demand response using the standard elasticity applied to the additional costs. This has an important effect in the calculations. It does not reduce the benefit from removing HGV traffic from the A628 since this is a fixed saving. However it reduces the extra traffic on the alternative route. This efficiency improvement also reduces the external costs on the new route, albeit at a lower rate than on the A628. It also reduces the total increase in internal (operational) cost. Ideally the elements of all the HGV journeys would be broken down into different road types and recosted. Since this data is not available we have simply illustrated the cost changes by changing the cost increases in line with the elasticity.

This is far from perfect but is all that is possible given the data and is set out in Table 2.7. The results are clearly subject to much greater uncertainty and sensitivity to assumptions than the passenger based elements of the package. We show some key results from the tests which we have applied using the methods above to demonstrate the variability as well as a best estimate. In particular it makes the point that the elasticity value causes major changes in the BCR because the environmental savings from HGV traffic reduction are constant and significant. It is also the case that the actual daily difference between costs and benefits in the zero behavioural response (£987 across all HGV traffic) is small and a very small percentage of the total operating costs. Despite this it produces a strongly negative BCR. By contrast the inclusion of behaviour change for HGVs creates a massively positive BCR.

In view of this we also calculated a limiting value for behavioural change (using the behavioural options quoted above) needed to give the HGV control scheme a good BCR. This is very small at 0.05 especially compared to the national average of 0.9, and should be easily achievable given the range of options available. Moving forward we recommend a more detailed analysis of existing HGV movements to provide a more robust appraisal.

Table 2.7: HGV control scheme appraisal: local access allowed all options

	Averaged figures No elasticity	Elasticity 0.9	Limiting e value (.05)
Net external costs saved per day	£27,072	£27,072	£27,072
Gross increase in daily operating costs	£28,059	£2,806	£26,656
Net change in daily cost (positive is benefit)	-£987	£24,266	£416
Capital cost (2010 prices)	£974,400	£974,400	£974,400
BCR	-9.2	+226.2	+3.94

All prices 2010, first year results discounted over 60 years using Green Book rates

HGV control scheme conclusions

As stated earlier, the lack of data from NH has been a major obstacle to providing a precise economic analysis. However, our testing using standard values and techniques has revealed the following:

- 1 Even using average figures there would be significant savings in external costs by transferring HGV traffic from the A628 to the motorway network
- 2 These savings would be very close to the extra operational costs involved in the longer route, again using average figures
- 3 While the savings stay constant, the extra costs are very sensitive to behavioural change on the part of HGV operators (represented by the elasticity value)
- 4 Using a standard elasticity there would be major changes in behaviour and a very large positive BCR
- 5 Given the uncertainty and variation these extreme values are best viewed as sensitivity tests pending a full analysis
- 6 Given the very small change in behaviour needed to produce a reasonable BCR from the scheme, our conclusion is that the most likely outcome is a positive BCR

Our best estimate therefore is that the HGV control scheme would reduce external costs sufficiently to cover increases in the operational costs experienced by operators. The use of average figures for the analysis rather than values specific to the National Park are likely to underestimate the cost savings which adds to the confidence in this conclusion.

Overall results for Low Carbon Travel for Longendale and Glossopdale

Taking an overview of the economic performance is possible despite the different appraisal periods by weighting the individual BCRs according to the capital cost. The most difficult question was how to treat the high level of uncertainty over the HGV impacts. A conservative approach was adopted, including the capital cost of the HGV control scheme in the package but setting benefits at zero. Thus only the Low, High and Central BCRs for the other elements were included. This gave the following:

Table 2.8: Overall Economic Performance

	Low	Central	High
BCR	3.34	4.99	6.98

Overall this shows a strong economic case, with the central case for Low Carbon Travel in the DfT “Very High” category. For every pound of public money spent Low Carbon Travel would provide £4.99 of benefits for the central case. It is much stronger than the A57 Link Roads BCR which is in the “Low” category³⁴ and one which is more in tune with strategic policies. This is explored further in the following section where an analysis of the negative impact of the proposed scheme on policy, in particular carbon, is considered further.

³⁴ See <https://www.gov.uk/government/publications/dft-value-for-money-framework>

It is worth saying that sustainable travel schemes often score well in terms of BCRs and the score for this package is well within what might be expected. The exception is where sustainable packages involve large scale disbenefits to car and HGV traffic. In this case the changes for HGVs have been estimated separately and there are few disbenefits for car users. This is because queues are relocated rather than increased and the benefits from lower HGV use are used to create better walking and cycling conditions and improved bus and cycle priority. There would be some improved reliability for car users but this benefit is hard to estimate and has been omitted from the BCR above.

Part 3: Analysis of the National Highways A57 Link Roads proposal

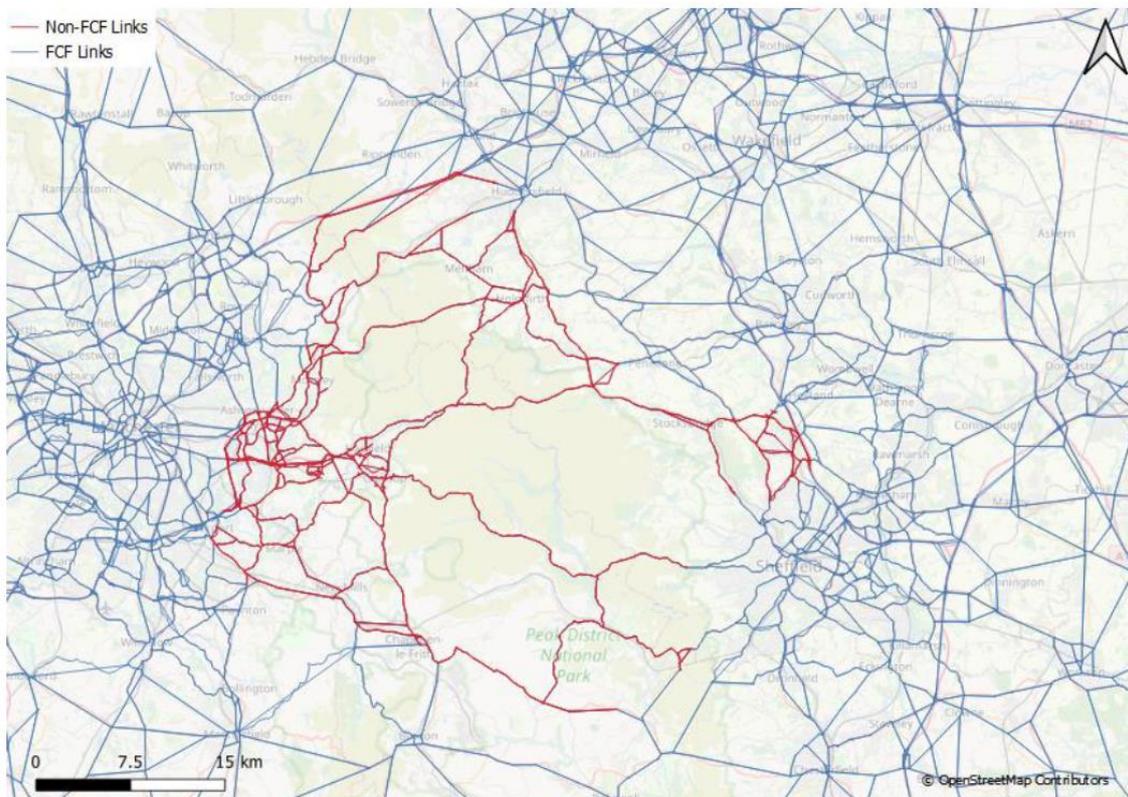
3.1 Modelling and the modelled area

NH used an existing large area simulation traffic model (SATURN) for their main assessment. The area covered is shown in Figure 3-1 (13.1 in the NH report) of the Combined Modelling and Appraisal report³⁵. This was supplied to CPRE following a data request and submitted to the Examination by CPRE as NH indicated it did not intend to submit the document. The wider model stretches from Liverpool to Grimsby and Harrogate to Matlock and includes Leeds and other major towns and cities at varying levels of detail.

It is normal to take such a broad model and produce greater detail in the area of interest. For example, NH have done this by expanding the model detail in the immediate neighbourhood of the scheme. This is called the Area of Detailed Modelling (**ADM**). What has not been done is to upgrade the level of detail for the modelling in the neighbouring areas where most of the traffic comes from and goes to: Greater Manchester. Although less traffic is related to Sheffield, this is not in the ADM either. This is clear in Figure 3.1 below, where the red network is essentially the ADM and the blue network has a Fixed Cost Function – i.e. it is not sensitive to changes in the cost of using the network caused by changing traffic patterns.

Figure 3.1 NH Map showing detailed and fixed cost networks

Figure 3-7 – Fixed Cost Function (FCF) area



³⁵ REP2-090 pdf page 608 of 790 <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-000782-A57%20Link%20Roads%20Additional%20documents%20-%20anne%20robinson.pdf>

In addition a further technique was used by NH to provide a stable model output. This is known as masking and reduces the impact of cost changes on traffic flows. The two techniques are described in the Combined Modelling and Appraisal report in section 13.7 on page 164 and 165³⁶.

It is clear from this that:

- Both Sheffield and Manchester are excluded from the detailed modelling
- Because of the base model’s overall size and strategic nature the networks within both cities are limited.

For this reason the modelling cannot represent the impact of the scheme on traffic patterns in Greater Manchester.

In relation to travel between the two cities, it is limited for two reasons:

- the cities themselves are outside the ADM and modelled at a low level of detail
- access to the A628 is included in the ADM but strategic routes which are likely to be affected to the North and South are not.

3.2 Uncertainty and the Uncertainty log

The TAG Unit on this subject, M4, dated May 2019, states in para 2.1.1:

“There are two sources of forecast error: uncertainty in the inputs (such as size of new housing development) and error in the model parameters and specification (how these inputs propagate through the model). The practitioner should summarise all known assumptions and uncertainties in the modelling and forecasting approach in an uncertainty log. The uncertainty log will also be the basis for developing a set of alternative scenarios. The alternative scenario is used to understand the possible impact of an error in assumptions on the model forecasts.”

This guidance is supplemented by the Uncertainty Toolkit, dated May 2021.

NH appear to have completed part of the log, relating to new development. They have not dealt with the second source of errors in terms of model parameters and specification. The Uncertainty toolkit gives more detail on what these might be in the table below.

Table 3.1: Extract from the DfT Uncertainty Toolkit

Technology	Economy	Behaviour
• Range of road vehicle types, and extent of technological standardisation;	• Economic performance; • Composition of labour market, different ways of working and changing business models; • Level of automation;	• Use of digital infrastructure and services; • Level of car ownership and extent of licence holding;
Take-up of Connected Autonomous Vehicles and Electric Vehicles;	• Patterns of spatial development and changes in regional distribution.	• Level of vehicle occupancy; • Demand for active travel; • Adoption of new technologies;

³⁶ REP2-090 pdf pages 610 of 790 <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-000782-A57%20Link%20Roads%20Additional%20documents%20-%20anne%20robinson.pdf>

<ul style="list-style-type: none"> • Nature, sufficiency and cost of energy supply; • Connecting energy supply to vehicle energy demand. 		
Social	Political	Transport Supply
<ul style="list-style-type: none"> • Changes in demographic composition (e.g. ageing population); • Changes in public health; • Importance of equity; • Climate change impacts and response; • Potential disruption to transport systems. 	<ul style="list-style-type: none"> • Regulatory influence (e.g. road-pricing) • Decisions on national infrastructure projects; • Roles, responsibility and interconnectedness of the public and private sectors; • International action on decarbonisation. 	<ul style="list-style-type: none"> • Other transport investments • Availability of and demand for public transport; • Carrying capacity of the rail network; • Digital vs. physical connectivity for access; • Production to consumption supply chains;

Some of these are directly relevant to this scheme: for example most of the Behaviour and Transport Supply entries. Climate change responses and decarbonisation are also major sources of uncertainty.

To give a specific example, it appears that it is unlikely that the current central road traffic forecasts are compatible with achieving international and national obligations on climate change. Carbon reductions will be required at a faster rate. However, the DfT has provided scenarios for forecasting and in this case, especially given that this is within a conurbation (albeit outside the centre), a more specific demand management forecast would have been advisable. Overall management of car demand to reduce the central forecast is assumed within the Climate Change Committee’s sixth carbon budget report and subsequent work to translate the implications. At the very least this should have been in the Uncertainty log but it is so close to likelihood that it should have been included in the low forecast scenario.

In terms of alternatives, some of what is proposed by CPRE (demand management locally in Longdendale, and more widely across the National Park) is pretty much essential to achieving the carbon targets. To be effective it must transfer drivers from their cars (and achieve higher levels of car occupancy, as in Table 3.1 “Behaviour” column above and the DfT TDP).

Comparing what NH have done with the contents of Table 3.1 above, and WebTAG guidance, the conclusion is that NH have omitted a major part of the Uncertainty Log and have not undertaken an appropriate sensitivity test.

3.3: Conclusions on modelling

The two main conclusions are that:

- 1 The model is insufficiently detailed in areas where most of the traffic begins and ends – the negative impact of this is explored further in the next section.
- 2 Uncertainty – which is a key area of concern for modellers – is not dealt with in line with the latest DfT guidance and this is a particularly serious omission for carbon emissions and travel behaviour change.

3.4 Negative impact on local and national policies

Introduction

A key point that forms the basis of this report is that the proposed scheme is clearly within, and mainly affecting an urbanised area, not a rural one. Transport policy in such areas does not usually include major increases in road capacity such as this one. This applies to TfGM where they are not developing highway schemes themselves. They are however aware that others are, including NH and are obliged to acknowledge them in their plans.

The emphasis on sustainable modes in these urbanised areas is well established, however there are new Government and local policies which reinforce this even more strongly, and are reflected in legislation. These are driven primarily by climate change which has targets to move car drivers to sustainable modes. However, better health through Active Travel and air quality improvement are also key factors – discouraging car use is a key part of implementing those policies. It must follow that encouraging car dependency directly undermines it.

The key pathways for mode change in the latest policies include:

- From driver to passenger (car sharing/household consolidation). This is reflected in the Government target for increased car occupancy.
- From car driver to walking and cycling. This is reflected in the Government 2030 target “half journeys by walking and cycling” in towns and cities.
- From car driver to public transport. This is supported in Government policy statements but has no specific target. In GM there is the “50-50” target for sustainable modes overall by 2040, but this includes public transport.

One problem with assessing the negative impact of a scheme on a different scheme designed to promote a competing mode (as in this case) is that it is often expressed verbally or in a criteria analysis – for example red, green, amber. On the other hand the benefits of many schemes are expressed in hard money terms and cover a wide range of journeys which obscure the negative impact, for example on sustainable travel.

This has led some transport practitioners to introduce the idea of compensating within an individual scheme appraisal for negative impacts. For example the Decarbon8 partnership, which has as partners the Greater Manchester and the Sheffield Combined Authorities, and academic institutions such as Leeds Transport Studies Group, suggest this approach for carbon.

Nothing like this has been done in the current case and indeed would be difficult, since the extent of the sustainable transport modelling appears to be limited to car drivers who might choose public transport. This became clear during a technical meeting with NH (19 Jan 2022) and during the examination hearings it further emerged that there was only rail as an alternative mode, not bus. A further model was referred to by NH during the Issue Specific Hearing on public transport³⁷. Clarification from NH was requested but was not forthcoming. Our original request was simple: what were the public transport use figures for the Do Minimum and Do Something in 2025 and 2040? As far as we know this is not in the

³⁷ EV-041 Transcript Issue Specific Hearing 3, Session 1, 1:05:26
https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001279-TRANSCRIPT_ISH3_SESSION1_A57LINKROADS_05042022.pdf

modelling and thus not available. Given the location of this scheme and its potential impact on public transport, this was a major omission.

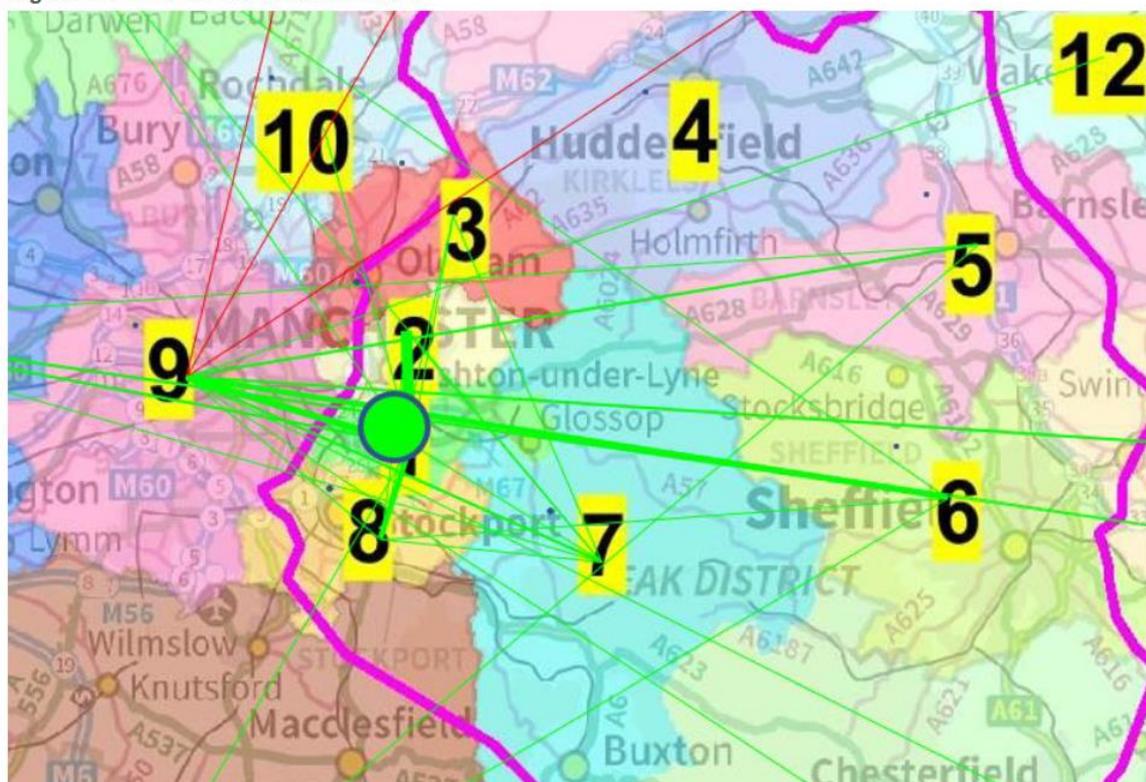
However the lack of monetisation of negative impacts need not be the case for all impacts. Indeed it must be true that if Government policy is to discourage car travel in certain circumstances, any encouragement to driving will need to be compensated for in a direct way. This extra expenditure will have to be in place just to maintain the relative competition between driving and sustainable travel before any new policies are implemented. The level of encouragement to driving is in fact measured by the A57 Link Roads model through the time savings and lower operating costs. The estimates which follow have been based on the detailed NH data requested which allows the monetised benefits in the relevant areas to be extracted.

The proposed A57 Link Roads: negative impact on sustainable travel

A key point in our analysis is that the main impact of the scheme is on car travel in urbanised areas (see REP5-028 page 12). This was not explained in our deadline 2 submitted material (REP2-070) as it required a new analysis of where the predicted benefits were located, using detailed information requested from and supplied by NH later. This was supplied in a 25 Sector format designed by them which is not perfect, but allows a reasonable approximation. The material first submitted by NH has a diagram which is not sufficiently clear for this to be done (which is why the detailed information was requested). Sector 1 is obscured by the green blob. The diagram is reproduced below.

Figure 3.2: NH map of areas of benefit

Figure 14-1 - TPU Benefit Distribution



The numbers in Figures 3.2 above and 3.3. below refer to the sector areas – Sector 1 obscured by the green blob is NH’s study area; Sector 2 is the remainder of Tameside; and so on as listed in Table 3.2

The actual matrix of benefits is supplied in Table 3.2 below. This shows the sector to sector flows including in the policy sensitive area. It is clear from this relatively cautious approach that two thirds of the benefits are in sectors where strong sustainability policies apply, from both central and local Government.

Data underpinning the negative impact

In terms of Table 3.2, the rows and columns are as supplied by NH and represent the origins and destinations of journeys in terms of the 10 local zones. The column labels across the top of the table represent the same areas as the rows. Thus column 1 is Mottram, column 2 is rest of Tameside and so on. Journeys entirely within the local area of Mottram (row 1 column 1) provide the greatest benefits to road users at £29.3m. Journeys from Mottram to the rest of Greater Manchester comprise the majority of road user benefits as shown by summing column 1 and comparing this figure of £117.7 million (2010 prices) with the total national benefits of the scheme of £178.7 million (again supplied by NH). 2010 prices are used by DfT and NH for appraisal so are used here. The comparison produces the figure of 65.9% for the proportion of road user benefits falling to local traffic. This is important because the whole of Greater Manchester is subject to the Right Mix policy and, as an urban area, to DfT's goal for 50% of all trips in urban areas to be made by active travel by 2030. It is therefore clear that even with this relatively cautious approach that two thirds of the benefits of the A57 Link Roads are to road traffic in sectors where strong sustainable travel policies and expenditure to support them are in force from both central and local Government.

Table 3.2: Matrix of A57 Link Roads' road user benefits

		Combined vehicle cost savings 2025 £million, 2010										
		1	2	3	4	5	6	7	8	9	10	
Study Area (Mottram)	1	29.3	5.1	1.6	0.2	0.1	0.8	1.7	3.1	7	0.8	49.7
Rest of Tameside	2	12.6	0	0	0	0	0.2	1.8	1.2	0.1	0	15.9
Oldham	3	2	0	0	0	0	0.3	0.8	0.5	0.1	0	3.7
Kirklees	4	0.1	0	0	X	X	X	X	0.1	-0.1	X	0.1
Barnsley	5	0.1	0	0	X	X	X	X	0.1	0.8	0	1
Sheffield	6	0.2	0.1	0.1	X	X	X	X	0.5	4.1	0.1	5.1
Rest of High Peak	7	0.4	0.6	0.3	X	X	X	X	0.2	1.9	0.2	3.6
Stockport	8	6.5	1	0.7	0.2	0.3	0.8	1.3	0.6	1.2	0.1	12.7
Manchester (North West Region)	9	11.2	0.3	0.2	0.6	3.5	6	2.4	0.7	0	0	24.9
Rochdale	10	0.6	X	X	X	X	X	X	X	X	X	1
		63	7.1	2.9	1	3.9	8.3	8.2	7	15.1	1.2	117.7

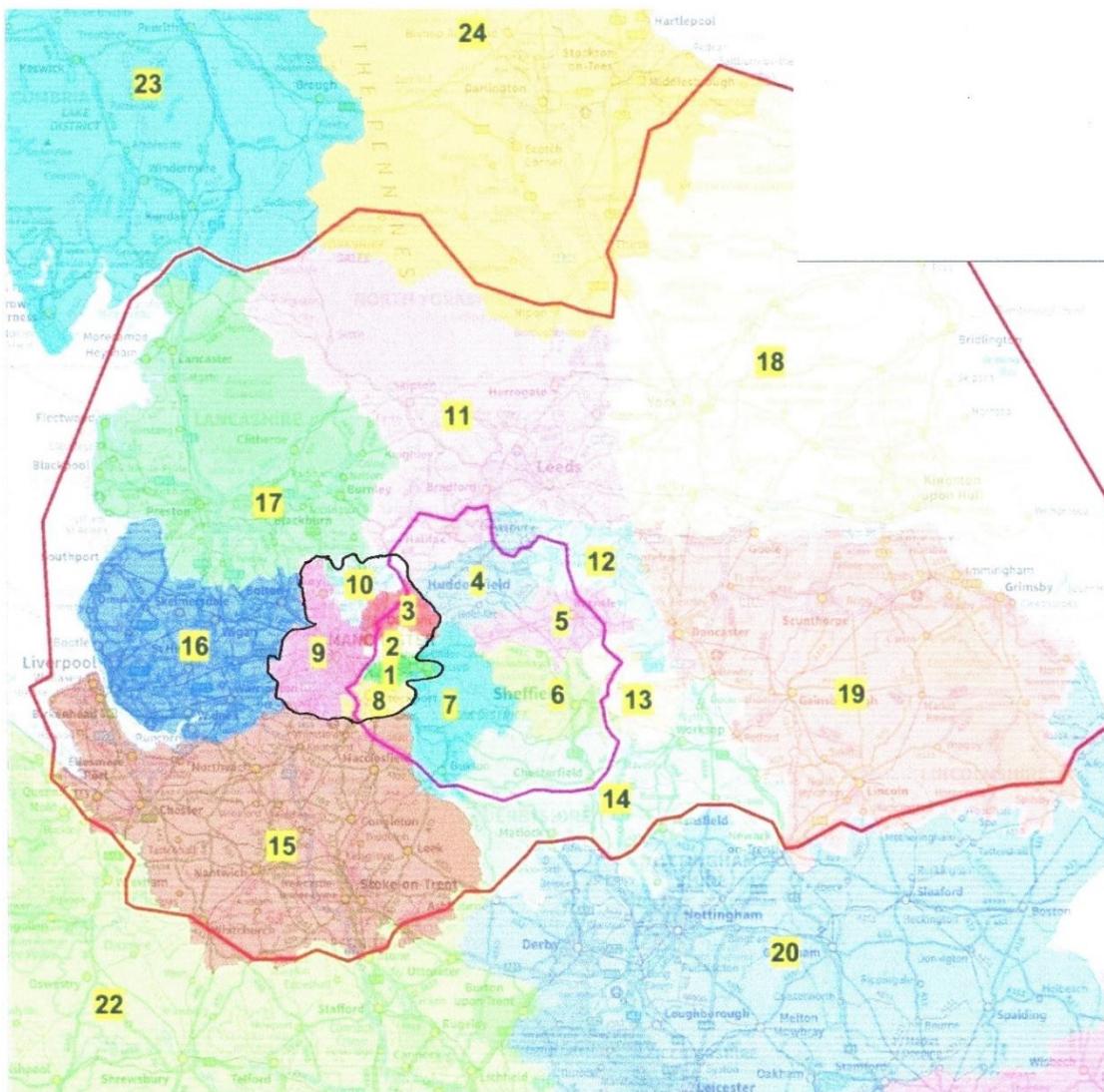
Orange is "masked" by NH - i.e. not counted. Total Benefit from scheme (NH data) 178.7 Percent local 65.9%

X This shows where flows have been excluded from the analysis by MTRU due to the Sectors not allowing precise definition of the urban areas

It is surprising that such an analysis was not done because one key reason that road capacity increases designed to speed up car journey times are not used in towns and cities is that this makes it harder to attract people onto alternatives. It would be against the laws of economics if that were not the case. The matrix analysis in Table 3.2 shows the extent of this problem. We have translated the 2010 price benefits into today's prices using the DfT factors which we estimate amounts to £146million over the appraisal period. The equivalent benefits must be offered to users of sustainable modes just to maintain the status quo, before encouraging the transfers required by the new policies.

To test this further, we have considered only those trips which are entirely within Greater Manchester. These still 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 referred to in the modelling section earlier. The area we have selected is the closest possible to Greater Manchester using the NH 25 sector system and is shown below outlined in black. As well as supporting the point that this is essentially a scheme with urban impacts which run counter to current policies, the figure below illustrates how much of Greater Manchester is outside the Area of Detailed Modelling (ADM) and thus why more detailed modelling should have been done in that urban area.

Figure 3.3: Map of areas included in the Greater Manchester only analysis



This also illustrates the confusion caused by the way NH supplied information during the Examination. In the map above (Figure 3.3) the area outlined in purple³⁸ is not the same as the ADM³⁹ which is smaller. In fact, it relates to another modelling function not used elsewhere. This map had to be used because the ADM map was not large enough to show the zones. It was supplied by NH in response to the CPRE request for data.

The next issue is how to represent this disbenefit to sustainable travel in a way which shows how much extra money would need to be spent now to compensate. This is because the benefit to drivers occurs each year over the whole appraisal period (although the costs are in the short construction period). We have therefore used the benefit profile in the Combined Economics and Modelling Report (Figure 14,2 REP2-090 page 635/790 in pdf) to translate the 60 year figure into an annual figure which shows the ongoing impact year by year – the same way the benefits unfold in the NH computer programme which produces the data for the economic assessment. The calculation is: annual benefit X 0.75 (to remove the impact on goods vehicles) X 0.659 (proportion of benefits in relevant area) X 1.24 (2010 prices to current prices). This illustrates (for the local authorities who have to implement the policies) how far sustainable travel spending would have to compensate each year into the future.

The benefit to drivers in the sustainable policy areas amounts to £3.75million in today's prices in the opening year (2025), rising to £7.4million in 2050 (again in today's prices and undiscounted). This illustrates the significant and growing negative impact the scheme will have on achieving local and national policies. Local budgets would have to find this money at least until 2050 but probably well beyond.

We have not considered the negative health aspects of discouraging active travel. Given the values used by DfT (for example in their AMAT tool) this would be a significant disbenefit.

In relation to value for money, the walking and cycling elements of the Low Carbon Travel package, which would achieve such policies, have been tested using the DfT's AMAT appraisal tool. That and the other approaches to testing value for money of the alternatives were set out previously in Part 2.10.

Above all this analysis illustrates the fact that the A57 Link Roads would significantly increase urban road capacity in the Greater Manchester area and as such is a significant anomaly in that area. It suggests that the development of alternatives would better meet the existing and most recent local and national transport policies. It would be possible for a joint approach by local authorities and the National Park to seek funding for alternatives from various sources including National Highways.

This illustrated another contradictory aspect of the approach to NH's A57 Link Roads. : NH's approach towards analysing the impact of the A57 Link Roads as a project appears inconsistent with its high level engagement with DfT on assessing sustainable travel, carbon and health impacts. Many practitioners including MTRU have witnessed this engagement first hand.

The conflict with current policies on carbon is considered in more detail in the following section.

³⁸ See REP2-090 Figure 13-1 Sector definitions, pdf page 608/790

³⁹ See REP 2-090 Figure 2-1 pdf page 17/790

Part 4: A57 Link Roads, Low Carbon Travel and conflicts with the carbon policy framework

4.1 Carbon emissions

Introduction

There is no doubt that policies on carbon emissions affecting this scheme have changed very significantly in the last few years. This includes legislation, such as net zero and Parliamentary acceptance of the Climate Change Committee's 6th Budget, policy statements such as the DfT Decarbonisation Strategy, and ongoing work revising guidance, for example the commitment in the Decarbonisation Strategy for a review of the National Policy Statement for National Networks (NPSNN) and the Secretary of State's statement to Parliament on 22nd July 2021 with a similar commitment. Meanwhile the existing NPS is in force. The A57 Link Roads Examination therefore took place immediately following a period of major change. However, that change had largely occurred and should have been fully taken into account.

Thus the Examination had to work in the context of what is in legislation and policy but not yet necessarily in habitual use by practitioners. This section seeks to clarify the position referring to the new legislative and policy context while still being guided by the NPS, in particular paragraph 5.17, which states:

It is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets. However, for road projects applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets.

Key questions to be answered

In relation to that statement there are five important questions considered in this section:

- 1) Which carbon should be counted and costed?
- 2) What is the real "Do Minimum"?
- 3) What is the cost of undermining Government and local policy?
- 4) What is significant?
- 5) What about the *de minimis* argument and the NPS?

1) Which carbon should be counted and costed?

In the current system, a marginal change is assumed between a Do Minimum and a Do Something future. To assess this, the appraisal must calculate how much carbon will be produced by the forecast levels of traffic. This is done in a simplified way by the DfT programme TUBA, and in a more complex way using DMRB guidance. NH have done both. The latter is used for the carbon cost calculations but not the economics. One reason is that TUBA covers a shorter time period than the DMRB method so is likely to be an underestimate.

The focus of interest for checking against policy however, should be consistency with the pathway to net zero, in particular that set out in the DfT TDP. For this reason, we requested this data from NH. They supplied TUBA carbon data (a standard output). The figures show that the total amount of carbon being emitted in a year is far higher in future years and does not meet the net zero pathway. NH did not consider this relevant – they only consider the marginal change between the Do Minimum and Do Something. This is completely inadequate for a strategic level test. The reduction in carbon from vehicle electrification is clear in the NH forecast, although it did not reach zero in 2051.

In fact, the cost of the Do Something in carbon terms should be tested against what the Government considers is essential to meet its climate change obligations. If the Do Minimum is

assumed to fail to meet Government commitments it cannot be considered to be a realistic prediction of future travel patterns. Policies such as those in the TDP and locally in the TfGM 50-50 programme are designed to achieve the pathway. Schemes which do not contribute, or, as in this case, undermine any programmes which would support the pathway, should not proceed. The key assumption by NH in the Do Minimum is that nothing would be achieved by central or local Government expenditure and this cannot be the correct basis for comparison. It was to test this that carbon emission data for the DM and DS were requested from NH. In fact, only TUBA data was available but at least provides a minimum guide.

Therefore the question considered here is how much of that total carbon is in excess of the amount required to meet the net zero/6th Carbon Budget requirements.

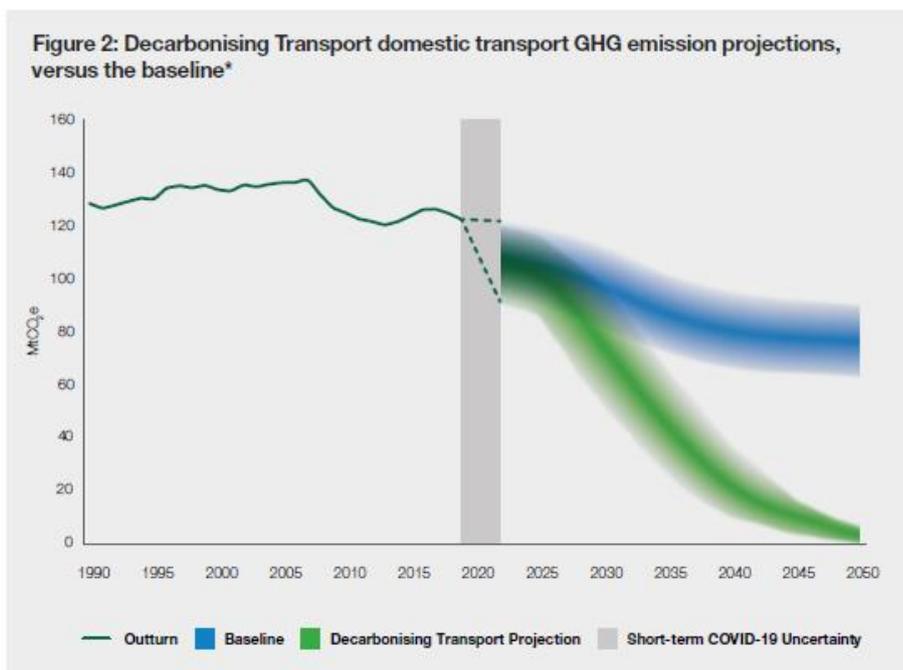
Table 4.1: Carbon emissions A 57 Do Something Core forecast

CO2e emissions based on TUBA (tonnes) per year	Do Minimum	Do Something
2025	641379	641842
2040	503272	503643
2051	480538	480650

Source: NH TUBA outputs

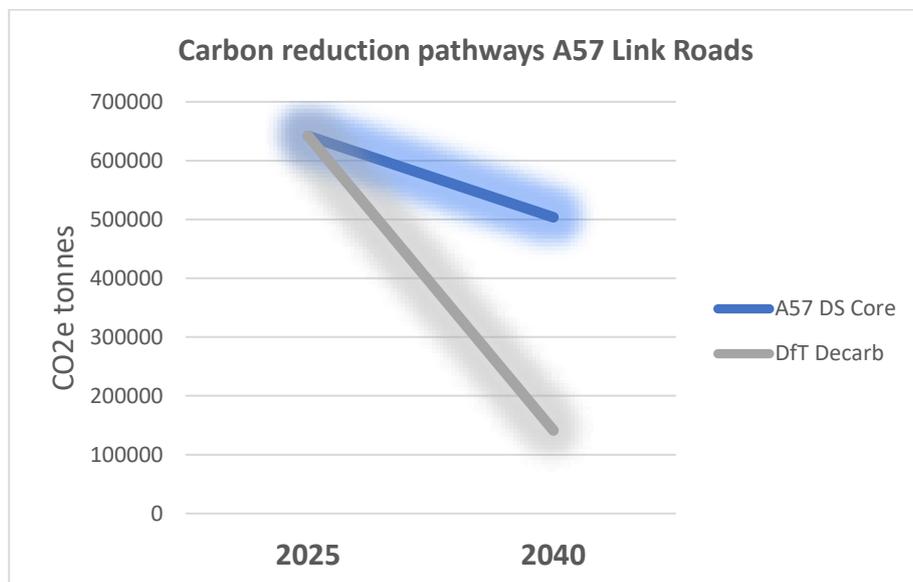
The first step was to look at the data in Table 4.1. This shows that the Do Something presented in the A57 Link Roads case shows clearly that there will be, after allowing for some electrification of the car fleet up to 2050, insufficient decrease in carbon to meet Government requirements. These are reflected in the chart in Figure 2 (page 45) of the Decarbonisation Strategy, shown below as Figure 4.1. The blue pathway is a Business As Usual baseline, the green pathway what should be achieved by TDP policies and programmes (containing both infrastructure and behavioural elements).

Figure 4.1: Extract from Transport Decarbonisation Plan



To test whether the future with the A57 Link Roads in place would meet the targets, the current scheme data from TUBA in Table 4.1 is set out in Figure 5.2 below.

Figure 4.2: Comparison of A57 Link Roads forecast with DTS



Note: NH does not seem to include latest Government plans in its modelling

Obviously we only have the data supplied by NH but the key point is that the NH best estimate shows the scheme as presented is delivering a huge amount of carbon in excess of the Government legally confirmed targets. Our serious reservations on this are included after Table 4.5 below.

Of course, a more aggressive electrification programme could deliver further reductions, together with HGV electrification, for example through overhead catenaries similar to those used for rail. These are being trialled by NH but are extremely unlikely to be achievable in the National Park - possibly achieving an HGV ban by default. This possibility should have been included by NH in the Uncertainty Log. However, some demand reduction will be required even with vehicle electrification. This is clear in the Climate Change Committee’s (CCC) 6th Budget.

The table below is extracted from the CCC transport sector document published with the 6th Carbon Budget. We use this since it provides the core targets which underpin the TDP.

Table 4.2: Range of car traffic reductions from different measures

	Traffic		Trips	
	Tech (e.g. home working)	Car occupancy	Walk and cycle	Bus
2030	-1 to -4%	-6%	-5 to -7% (-1 to -2%)	-9 to -12% (-5 to -7%)
2050	-4 to -12%	-19%	-9 to -14% (-3 to -4%)	-17 to -24% (-10 to -14%)

The CCC give trip reductions for sustainable modes rather than traffic (distance travelled). These are likely to be higher than the traffic reductions would be because of lower trip lengths⁴⁰. Using

⁴⁰ This can be compensated for by substituting a short walk trip for a longer car trip but is not included in this analysis.

the standard NTS data for average trip length which CCC uses, the trips have been converted to vehicle kilometres to produce the parenthetical figures in italics. The extensive work by CCC is used for the final central requirements in Table 4.3 below. These are reductions on the baseline – i.e. in real terms traffic is predicted to grow (as in the A57 Link Roads NH appraisal) but the CCC identifies the required reduction on that figure.

Table 4.3: 6th Carbon Budget combined demand management required

	Combined impact: car traffic reduction on baseline (as vehicle kilometres)
2030	-6%
2040	-12%
2050	-17%

Note: 2040 is derived from CCC table as a half way point

This does not appear to be taken into account in the NH traffic forecasts. What should happen is that a future scenario which achieves these reductions should be compared to the Do Something scheme, which is clearly part of a future which encourages driving rather than the modal and behaviour change required by the CCC 6th Budget.

There is thus a lack of basic data for this scheme, even in the context of the Examination in Public, which has been a source of ongoing problems reflected throughout this report. This makes it hard to be precise about how much additional carbon over the level required to meet the 6th Carbon Budget, is being produced.

The best indicator supplied so far is the NH “Low” forecast. This applies a lower car use forecast to the model and thus produces lower carbon emissions and outputs them for TUBA. The lower forecast is due to factors different from the CCC demand reductions such as lower economic growth and higher trip making. It is thus not the same as the CCC reductions although it goes some way towards them.

The key point is that it has been run through the transport model to predict the carbon emissions for a demand managed forecast in a form comparable to that for the NH’s best estimate of carbon emissions with the scheme in place. The reductions with the scheme in place (mainly due to electrification of vehicles) can thus be compared to the reductions from the lower demand forecast. This reveals reductions as below which can then be compared to the CCC predicted reductions with a slower rate of car traffic growth.

Table 4.4: Carbon emissions A 57 Link Roads Do Something Core compared to Do Minimum Low

Target year	Reductions
2030	-6.3%
2040	-9.2%
2050	-10.9%

While 2030 Low forecast is close to the 2030 CCC reduction (in Table 4.3), the Low forecast increasingly underperforms at the required level. Despite this it is possible to use the Low forecast to indicate the missing amount of carbon reduction and, interestingly, its cost.

The TUBA table supplied by NH is shown below, with the carbon emission differences calculated by MTRU.

Table 4.5: NH TUBA carbon outputs

	Core Scenario			Low Growth Scenario			
GHG Benefit from DMRB (£m, 2010 PV)	-17.45			Not assessed			
GHG Benefit from TUBA (£m, 2010 PV)	-0.46			-0.79			
CO2e emissions based on TUBA (tonnes)	DM	DS	DS – DM	DM	DS	DS – DM	Difference tCO2e
2025	641379	641842	462	601341	602011	668	40,501
2040	503272	503643	371	457101	457433	330	46,542
2051	480538	480650	113	428,325	428610	286	52,325

The differences between the two can be annualised assuming a straight line. These can then be put through the DfT carbon cost toolkit to provide an estimate of additional carbon cost.

This produces a cost of £223million over the 60 year appraisal period and would turn the BCR for the scheme negative.

As a test of whether the carbon deficit is robust, the carbon toolkit was run against a cut-off date of 2051 (on the optimistic assumption that everything is net zero by then). This still produced a carbon cost of over £120million.

At this stage we wish to say that there must be serious concerns over the way in which carbon has been treated overall for this scheme. Our view is that the modelling includes some electrification but apparently not the latest commitments in 2030 and 2035. For this reason much of the NH work must be considered with a high level of uncertainty. However, at the moment everything calculated for this submission has followed the same procedures as NH so can be directly compared. At a late stage some additional statements were produced and it appears that these were not based on modelling and gave no detail of how they were derived⁴¹. Requests for clarification have so far remained unanswered.

2) *What is the real “Do Minimum”?*

This issue is familiar to transport practitioners and is directly related to, and follows on from, the previous section. In the current system, a marginal change is measured between a Do Minimum and a Do Something. This approach was justifiable when comparing futures in which the existence of the Do Something was totally disconnected from the Do Minimum, in this case building more road capacity in Greater Manchester is assumed to have no impact on what the future transport programmes without such capacity would be. Hence the same core forecast is used for both in the NH analysis. This is fundamentally wrong in cases such as this in complex outer/inner metropolitan and mixed areas.

⁴¹ REP5-025 [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001105-TR010034_9.58_Schedule_of_change_to_book%20of%20reference%20\(tracked\)%20D5%20230222.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001105-TR010034_9.58_Schedule_of_change_to_book%20of%20reference%20(tracked)%20D5%20230222.pdf)

In reality there are two different futures being considered, the first is one in which there is less traffic, which requires a shift in competitive advantage toward sustainable modes. The other is one in which driving is given sufficient encouragement that traffic will continue to rise. The latter is the core forecast.

DfT had already moved to what it calls “scenario” forecasts in 2015 which allow for different assumptions about the future. It has also published the Uncertainty Toolkit, which suggests that the modelling and forecasting parameters should be considered, including the impact of demand management and behaviour change. This was set out in more detail in Part 3.2 so is not repeated here. However this guidance, which was ignored by NH, has moved away from the old “low, central, high” forecasts.

It is also important to say that this is not dealt with by modest adjustments to trip making in the modelling through the Diadem software. The A57 Link Roads modelling starts with the same base forecast and has only minor impacts, as shown clearly in the NH documentation. A significant section of Diadem was turned off for the NH modelling in any case. Evidence of the widespread understanding and acceptance by the profession of the approaches set out in answer to questions 1 and 2 posed above can be found in the joint local authority/professional body submission on Green Book reforms, PTRC papers and the TPS Annual Review extract in the Annex to REP4-031⁴²). Much of this is reflected in the Uncertainty Toolkit and WebTAG.

3) *What is the cost of undermining Government and local policy?*

The second issue is the strategic fit of the scheme with relevant national and regional policies on carbon, including how it fits with CCC budgets. It is clear that encouraging people to use alternatives to the car needs to make them relatively more attractive. This can be done by making them faster or cheaper or more convenient (in the case of buses more frequent as well). The other method is to make car use less convenient or costly. Such approaches are well known and often referred to as “stick and carrot”. As stated earlier in this report, anything which makes car journeys faster will move that balance of competition against sustainable travel, i.e. creates a carrot in the wrong direction.

At the moment Government policy is focussed on travel in towns and cities and there are clear targets for changes in the mode share for walking and cycling, and indications that mode switch is desired for public transport.

Using the information now obtained from NH it has been possible to assess how much of the economic advantage is provided to car use reasonably considered to fall within the scope of those targets (see page 36). This information is not in the original NH submissions to the Examination.

Another approach to this has been suggested by Professor Greg Marsden from the Decarbon8 partnership. This includes academia and local authorities (including Manchester and Sheffield) and runs a number of innovative projects. He proposes that schemes which have forecasts in excess of the CCC required reductions should identify specific additional reductions elsewhere and count the cost in the appraisal⁴³. This would provide an alternative and perhaps more realistic approach than simply costing the extra using the carbon toolkit.

⁴² REP4-031 <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001045-CPRE%20PDSY%20-%20Other-%20response%20to%20ISH%20%20and%20written%20summary%20of%20oral%20sub%20mission.pdf>

⁴³ For example see: <https://decarbon8.org.uk/is-this-new-road-ok/>

4) *What is significant?*

In this report the question of whether NH has counted the amount of additional carbon correctly has already been considered. However, it is important to note that there was also an issue over the significance of the amount estimated by NH and used for its carbon cost assessment. During the Issue Specific Hearing⁴⁴ it was clear that a straightforward and widely accepted definition of what was a significant amount of additional carbon was not available. This is related to the NPS statement and the *de minimis* argument is considered in the next question. On significance overall there are two critical aspects:

- a. was the amount calculated by NH significant?
- b. Should the significance of the amount used by NH be viewed in isolation or in light of other similar proposal to increase road capacity?

In relation to the first aspect, the 401,000 tonnes of extra CO₂e calculated by NH can be judged against published emission reductions which are part of the net zero strategy and 6th Carbon Budget. For example, the Climate Change Committee estimates that an average battery electric vehicle (BEV) bought today will “save more than 35 tonnes of CO₂ over their lifecycle versus a conventional equivalent”.⁴⁵ Thus to compensate for the A57 Link Roads carbon deficit an extra 11,457 BEVs would have to be bought this year, above what would otherwise be the case. This number rises over time because conventional vehicles are getting more efficient, for example if they had to be bought in 2025 the number would be higher.

An alternative would be to consider the Government’s urban policies for walking and cycling, these are estimated to save between 1million and 6million tonnes CO₂e by 2050, clearly displaying a high level of uncertainty about what would be achieved. The A57 Link Roads carbon deficit (over a longer timescale) would be 40% of the lower figure and 7% of the higher figure. The cost of the measures to achieve the 1-6million tonnes reduction is £2billion over the first 5 years. Despite the wide range in estimated impact, using extra measures of this type to compensate for the A57 Link Roads carbon deficit would be in the hundreds of millions of pounds. This confirms the conclusion from Table 4.5 that including the correct amount of carbon from the scheme would turn the BCR strongly negative, even using the Government’s current values.

The “in isolation” issue is related to final question considered here: *de minimis*.

5 *What about the de minimis argument and the NPS?*

The final issue is probably the best known - the *de minimis* argument – where the amounts of carbon from an individual action (or scheme) are considered too small on their own to undermine carbon reduction, even when part of a wider programme.

This is subtly different from the significance issue – if there was doubt over whether the amount was significant or not, is it really an isolated event or part of a wider programme?

This has been argued over extensively and to summarise: if this scheme were an isolated occurrence with no accompanying or associated actions or schemes this might possibly apply. It might be the case if there was only one road scheme in RIS2 or elsewhere in the UK. Clearly this condition does not hold true. A further issue is that the existence of a number of schemes to increase road capacity underpins the road traffic forecasts (and has done since the 1997 forecasts).

⁴⁴ EV-033 ISH 2 Day 2 Session 1, 45:16 onwards https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010034/TR010034-001000-TRANSCRIPT_ISH2_DAY2_SESSION1_A57LINKROADS_10022022.pdf

⁴⁵ Box M2.2 on page 18 of the Transport Sector document of the CCC 6th Carbon Budget Sector Summaries: <https://www.theccc.org.uk/publication/sixth-carbon-budget/#sector-summaries>

The NPSNN states that:

5.17 Carbon impacts will be considered as part of the appraisal of scheme options (in the business case), prior to the submission of an application for DCO. Where the development is subject to EIA, any Environmental Statement will need to describe an assessment of any likely significant climate factors in accordance with the requirements in the EIA Directive. It is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets. However, for road projects applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets.

The DfT Transport Decarbonisation Plan (TDP) says:

The current National Policy Statement (NPS) on National Networks, the government's statement of strategic planning policy for major road and rail schemes, was written in 2014 – before the government's legal commitment to net zero, the Ten Point Plan for a Green Industrial Revolution, the new Sixth Carbon Budget and most directly the new, more ambitious policies outlined in this document. While the NPS continues to remain in force, it is right that we review it in the light of these developments, and update forecasts on which it is based to reflect more recent, post-pandemic conditions, once they are known.

While that review has yet to take place, the statement supports the approach set out in this report in many sections, the forecasting to reflect net zero policies and programmes, the newly structured uncertainty log and the carbon strategy assessment. For example, the real comparison for carbon emissions is between a package of sustainable measures with less traffic and the scheme as proposed with the central traffic forecast and 'business as usual' of which it is an integral part.

There is thus a strong argument for finding against this scheme in light of the ongoing plans locally and nationally to decarbonise transport. However it would be wrong to ignore the fact that the NPS statement itself has always contained a lack of credibility in relation to its impact. It is clear, for example, that the failure of one person to purchase an electric car is very, indeed extremely, unlikely to derail the Government's carbon reduction target. If everyone adopted this approach, i.e. not in isolation, the Government's policy would fail completely.

HA and now NH road schemes are not promulgated in isolation – the *de minimis* argument does not hold in any normal sense. Yet the carbon increase forecast by NH is an isolated figure. It assumes that there is no relationship between this scheme and RIS2 as a whole. A more realistic question in this context would be: what would the position be if every scheme in RIS2 produced as much carbon as the A57 Link Roads?

The key point is that it is not a question of marginal change: schemes should be supporting these targets and not undermining them, both in terms of increasing carbon but in terms of negating the impact of other policies.

In the A57 Link Roads case there is capital expenditure of about £180million in today's prices. RIS2 is valued at £24.5billion but about £14billion is on capital schemes. If all of them produced as much carbon as the A57 Link Roads, it would amount to over 31million tonnes of CO₂e. This is approaching the estimate for the total impact of electrifying the whole bus and coach fleet in the Decarbonisation Strategy (35-37million tCO₂e). The total impact of electrification of all cars, taxis and vans is 620-850million tCO₂e removed.

RIS2 should not allow schemes to remain in the programme which produce carbon on a scale which, if replicated, would fail to meet the level of reduction required if the Government target is to be met.

4.2 Costing carbon

There are two remaining issues on carbon which need to be addressed:

- The new valuations for carbon and impact on the BCR
- The issue of carbon persistence and its importance in assessment beyond the one-off cost.

New carbon value

NH did not supply their carbon spreadsheet so CPRE had to undertake its own calculation using the current carbon tool and this was confirmed by NH as accurate. It increased the central estimate for carbon cost significantly from -£17.45 to -£30.21 million. The low to high range also increases significantly.

To illustrate the impact, the following tables are set out. They show the results from the DfT carbon tool to create a high to low range of outcomes based on the NH traffic modelling. The tables can be compared to the ones in the existing NH documentation. Where there are disbenefits, for example accidents, air quality and carbon, these are shown as negative values. The first applies the low and high carbon values across the three traffic forecast scenarios: Low, Core and Optimistic (High).

Table 4.6: Impact of New Carbon Values

New carbon values: High to Low			
	Low Growth	Core Growth	Optimistic Growth
User benefits (TEE)	£153.44	£181.25	£210.19
Accident benefits	-£7.33	-£7.33	-£7.33
Indirect Taxation	£1.90	£1.41	£1.79
Greenhouse gas benefits	-£45.32	-£30.21	-£15.02
Air quality	-£3.77	-£3.77	-£3.77
Noise	£3.17	£3.17	£3.17
Delays during construction	-£1.04	-£1.04	-£1.04
Total (PVB)	£101.05	£143.48	£187.99
BCR	0.94	1.33	1.75

Table 4.7 displays a constant central value for carbon emissions for low and high as well as central forecasts. This does not seem logical but NH argued this was more comparable to their approach so we have recalculated it to show the impact. The key point remains valid.

Table 4.7: Impact of New Carbon Values: Constant Central

New carbon values: Constant Central			
	Low Growth	Core Growth	Optimistic Growth
User benefits (TEE)	£153.44	£181.25	£210.19
Accident benefits	-£7.33	-£7.33	-£7.33
Indirect Taxation	£1.90	£1.41	£1.79
Greenhouse gas benefits	-£30.21	-£30.21	-£30.21
Air quality	-£3.77	-£3.77	-£3.77
Noise	£3.17	£3.17	£3.17
Delays during construction	-£1.04	-£1.04	-£1.04
Total (PVB)	£116.16	£143.48	£172.80
BCR	1.08	1.33	1.60

In both tables the BCR falls significantly and is far below what we estimate for Low Carbon Travel. In view of the sensitivity of the scheme area adjacent to the National Park, and the fact that a majority of the traffic on the scheme travels through the Park, actions which encourage such traffic should be subject to the most rigorous assessment.⁴⁶ Damage to the Park would require a major justification and the BCR, at the lower end of what transport schemes, including road schemes, should achieve provides no such justification.

4.3 The real impact of carbon

The final issue to be addressed is how to measure failure to achieve carbon targets. This is not fully captured by the cost estimates.

Emissions are usually measured in tonnes of CO2 equivalent (tCO2e), and this the standard measure. The key objective, now enshrined in UK policy and across the world is to avoid a specific level of global warming, such that a catastrophic level of climate change can be avoided. The agreed critical end date is 2050. The level of warming depends, not on the tonnes emitted, but how long their warming effect lasts. Carbon dioxide persists as a warming influence for around 100 years. In relation just to the 2050 target, a tonne emitted now will have its warming effect for 30 years.

The failure to use the correct metric initially has had clear adverse results on the NH appraisal. Reducing tonnes emitted now is underestimated in assessment against objectives to avoid climate change, while reducing tonnes emitted later may be politically easier, and heavily discounted, but has far less benefit. These flaws were extensively discussed during 2007-2008, and led to the Climate Change Committee devising the budget periods for emissions. This is not perfect but seeks to address this problem.

⁴⁶ The National Park Authority opposes the A57 Link Roads and supports alternatives

A true assessment of carbon impact should take this into account (as do the Climate Change Committee forecasts). This is especially important because any carbon emitted now will still be having a warming effect past the target date for zero emissions and be contributing to temperature rise. Any excess over budget emitted now requires a proportionately higher reduction later, and this increases over time. It would be better to measure carbon in tonne years rather than tonnes for the purpose of our commitment to carbon reduction and keeping the temperature rise to 1.5 degrees. It is what is needed to achieve the target of avoiding climate change and would improve the way that demand management and active travel is treated in appraisal.

5 Conclusions

5.1 A new approach

The Low Carbon Travel package developed here, and subjected to a local engagement process, directly addresses the problems identified over many years along the trunk route⁴⁷.

It meets the strategic objectives of the A57 Link Roads; is feasible and deliverable; and provides Very High value for money with a BCR of 4.99 using our central assumptions.

It also avoids the adverse effects of the proposed A57 Link Roads and distributes benefits over a wide area, in particular bringing relief to other villages.

It therefore represents an option that requires full and proper testing before proceeding to a scheme which increases road capacity.

All this has been demonstrated despite the lack of information provided by NH.

5.2 A flawed appraisal of the A57 Link Roads

This view is reinforced by our analysis of the A57 Link Roads, which shows clearly that NH's formal appraisal has been deficient.

It has not assessed the impact of the scheme on HGV traffic demand and on public transport.

The modelling is insufficiently detailed in areas where there are major impacts and has had its sensitivity in such areas reduced through techniques such as fixing costs and "masking".

The forecasts have not been set within the framework of current Government and Greater Manchester policies for reducing car trips and increasing active travel and public transport use.

Uncertainty in modelling and forecasting has not been dealt with robustly, in particular the DfT Uncertainty Toolkit has not been followed and the Uncertainty Log is incomplete in key areas.

The carbon emissions assessment did not reflect the new carbon values which NH recognise are correct.

The carbon assessment did not reflect the key issue of non-conformity of the scheme forecast with the pathway in the DfT Transport Decarbonisation Plan. Within limited financial resources, schemes which do not contribute to the carbon reduction pathway, should not proceed. This is strengthened by the fact that in this case the scheme significantly undermines programmes which would support it.

5.3 Way forward

There would therefore be merit in refusing the A57 Link Roads DCO and asking NH to urgently commence:

- 1 Repeating the local options appraisal afresh, with our *Low Carbon Travel* measures fully developed and tested in light of the established local and national policies for achieving healthy and sustainable travel
- 2 Developing a similar strategic approach for the whole corridor, reflecting
 - i. National Government's pathway to carbon reduction, in particular the TDP;
 - ii. The special nature of the National Park and PDNP's policies for traffic management;
 - iii. the transport policies of cities which the road is designed to serve including Sheffield as well as Manchester.

⁴⁷ Except for maintenance and asset condition where technological improvements have already been made by NH

Annex 1

**Extract from Local Walking and Cycling Infrastructure Plans, Guidance for Local Authorities,
DfT April 2017**

Chapter 6

6.33 Improvements that can potentially be implemented to address existing deficiencies may include the following:

- **new walking links**
- **additional pedestrian crossings**
- **improving existing pedestrian crossing facilities, e.g. crossing width, introducing refuges, reducing waiting times, and/or increasing crossing times**
- **replacing broken/uneven/rocking pavements**
- **resurfacing footways**
- **improving street lighting**
- **providing CCTV security cameras**
- **increasing pedestrian capacity (Pedestrian Comfort Levels) by widening footways and/or reallocation of carriageway space**
- **removing street clutter**
- **reducing traffic speeds, e.g. by introducing 20mph limits/zones and providing traffic calming features**
- **providing dropped kerbs and tactile paving**
- **improving signage and wayfinding**
- **improving planting, shade and shelter**
- **improving seating facilities to enable people to rest**
- **general improvements to the public realm, encompassing some or all of the above**

Annex 2: Initial Option Assessment 2015

Initial Sifting Criteria

Each option must meet the following sifting criteria to be considered further within EAST:

- 1: Overall moderate impact against identified problems (Appraisal score >4)
- 2: Overall moderate fit with route objectives (Appraisal score >3)
- 3: Must be deliverable in theory
- 4: Must be feasible in theory

Qualitative assessment against identified problems		Qualitative assessment against identified objectives		Deliverability (e.g. political, planning, timescale or third party issues)		Feasibility (e.g. physical constraint, land availability and design standards)	
2	Large beneficial impact	2	Large beneficial impact	Deliverable in theory	Feasible in theory		
1	Beneficial impact	1	Beneficial impact	Deliverable but with challenges	Feasible but with challenges		
0	Neutral / marginal impact	0	Neutral / marginal impact	Very difficult to deliver	Not feasible / significant challenges		
-1	Adverse impact	-1	Adverse impact				
-2	Large adverse impact	-2	Large adverse impact				

Reference (Route Section-Intervention)	Option Description	Problems (EAST Scale of Impact)							Objectives (EAST Fit with Other Objectives)							Deliverability	Feasibility	Initial Sifting Criteria Prior to EAST				Take to EAST	
		1	2	3	4	5	6	7	Total	1	2	3	4	5	6			Total	1	2	3		4
1.0	A628 HGV Control (inc. complementary sustainable measures)	-2	0	1	0	0	2	1	6	-1	1	1	1	0	2	4	Very difficult to deliver	Feasible but with challenges	✓	✓	✗	✓	✗
2.0	A628 Peak Period Only HGV Control (inc. complementary sustainable measures)	-2	0	1	0	0	2	1	6	-1	1	1	1	0	2	4	Very difficult to deliver	Feasible but with challenges	✓	✓	✗	✓	✗
3.0	M67 to A616 Link Road	1	0	0	0	1	1	1	4	1	0	1	1	1	1	5	Deliverable but with challenges	Feasible but with challenges	✗	✓	✓	✓	✓
4.0	A57 Mottram One-Way	1	0	0	0	1	1	2	5	1	0	1	1	1	1	5	Deliverable but with challenges	Feasible but with challenges	✓	✓	✓	✓	✓
5.0	Dual Carriageway Link Road M67 to A57 Mottram Moor (tunnel under Roe Cross and spur connecting to A6018)	1	0	0	1	1	1	2	6	1	-1	1	2	1	1	5	Deliverable but with challenges	Feasible but with challenges	✓	✓	✓	✓	✓
6.0	A57(T) to A57 Link Road	1	0	0	0	1	1	1	4	1	0	1	1	1	1	5	Deliverable but with challenges	Feasible but with challenges	✗	✓	✓	✓	✗
7.0	Bypass of Mottram, Hollingworth and Tintwistle	1	0	0	1	1	2	2	7	2	-1	1	2	1	1	6	Deliverable but with challenges	Feasible but with challenges	✓	✓	✓	✓	✓
8.0	M67 to M1 Dual Carriageway Link Road	1	1	0	2	2	2	2	10	2	-2	-1	2	1	1	3	Very difficult to deliver	Not feasible / significant challenges	✗	✗	✗	✗	✗
9.0	M67 to M1 Trans-Pennine Tunnel	-2	2	0	2	2	2	2	12	2	1	2	2	2	1	10	Very difficult to deliver	Feasible but with challenges	✓	✓	✗	✓	✗
10.0	A628/A616 Selected Dualling	1	0	0	1	1	1	0	4	1	-1	0	1	1	1	3	Very difficult to deliver	Feasible but with challenges	✗	✗	✗	✓	✗
11.0	A628/A616 Dualling	-2	1	0	2	2	2	0	9	1	-2	-1	1	1	1	1	Very difficult to deliver	Feasible but with challenges	✓	✗	✗	✓	✗
12.0	A61 Dualling	1	0	0	1	1	1	1	5	1	0	0	1	1	1	4	Deliverable but with challenges	Feasible but with challenges	✓	✓	✓	✓	✓
13.0	Climbing Lanes	1	0	0	1	1	1	0	4	1	-1	0	1	1	1	3	Deliverable but with challenges	Feasible but with challenges	✗	✗	✓	✓	✗
14.0	Route Safety Improvements	-2	0	1	0	1	0	0	4	0	0	0	0	0	2	2	Deliverable in theory	Feasible in theory	✗	✗	✓	✓	✗
15.0	A616 Widening at Midhopestones	1	0	0	1	1	1	0	4	1	0	0	1	0	1	3	Deliverable but with challenges	Feasible but with challenges	✗	✗	✓	✓	✗
16.0	A616 Langsett Widening Scheme	1	0	0	1	1	1	0	4	1	0	0	1	0	1	3	Deliverable but with challenges	Feasible but with challenges	✗	✗	✓	✓	✗
17.0	A616/A628 Flough Junction Improvement Scheme	1	0	0	1	1	1	0	4	1	0	0	1	0	1	3	Deliverable but with challenges	Feasible but with challenges	✗	✗	✓	✓	✗
18.0	A628 Salters Brook Scheme - Carriageway Realignment	1	0	0	1	1	1	0	4	1	0	0	1	0	1	3	Deliverable but with challenges	Feasible but with challenges	✗	✗	✓	✓	✗
19.0	Slow Vehicle Refuges	1	0	0	0	0	1	0	2	1	0	0	1	0	1	3	Deliverable but with challenges	Feasible but with challenges	✗	✗	✓	✓	✗
20.0	Technology Package	1	0	2	0	0	0	0	3	0	0	0	0	1	0	1	Deliverable in theory	Feasible in theory	✗	✗	✓	✓	✗
21.0	Maintenance Strategy	0	0	0	2	2	0	0	4	0	0	0	0	1	0	1	Deliverable in theory	Feasible in theory	✗	✗	✓	✓	✗
22.0	A628 Peak District Tunnel	1	2	0	1	2	2	1	9	2	1	1	2	1	1	8	Very difficult to deliver	Feasible but with challenges	✓	✓	✗	✓	✗
23.0	Sustainable Transport Measures	1	0	0	0	0	0	0	1	0	0	1	0	0	1	2	Deliverable but with challenges	Feasible but with challenges	✗	✗	✓	✓	✗

Problems

1	Accidents reduce journey time reliability, with high accident rates on some routes and a number of accident clusters
2	Severe weather causes road closures which reduce journey time reliability
3	There is a lack of technology to assist in the operation and management of the routes and provide information for travellers
4	Maintenance on single carriageway sections reduces journey-time reliability.
5	Asset condition, including the standard, age and damage to infrastructure, reduce journey-time reliability through significant maintenance operations and risk from closures
6	Journey-times are increased by delays at junctions and the geometry and topography of routes
7	Long term traffic growth will bring some urban sections of routes to their capacity

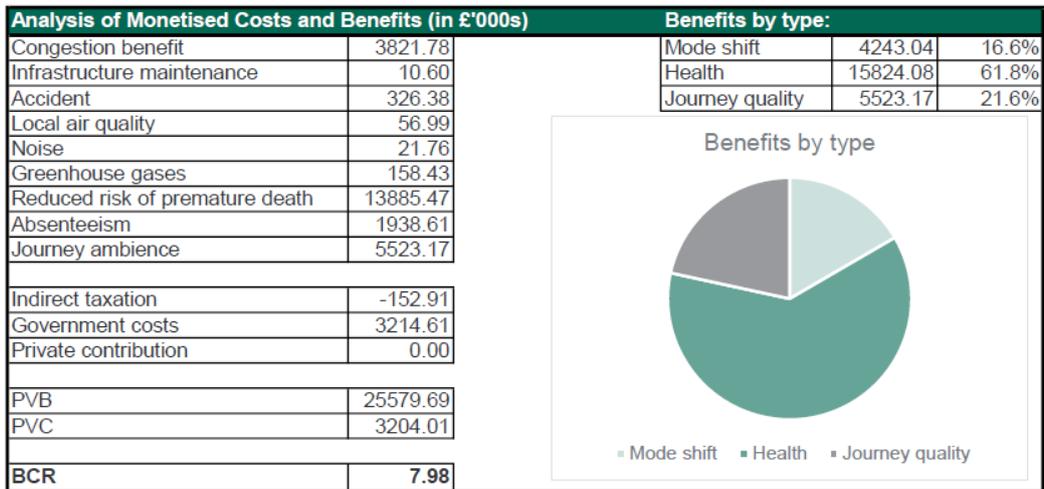
Objectives

1	Connectivity – improving the connectivity between Manchester and Sheffield through reduction in journey times and improved journey-time reliability
2	Environmental – avoiding unacceptable impacts on the natural environment and landscape in the Peak District National Park, and optimising environmental opportunities
3	Societal – improving air quality and reducing noise impacts, and addressing the levels of severance on the Trans-Pennine routes in urban areas
4	Capacity – reducing delays and queues that occur during peak hours and improving the performance of junctions on the routes
5	Resilience – improving the resilience of the routes through reductions in the number of incidents and reduction of their impacts
6	Safety – reductions in the number of accidents and reductions of their impacts

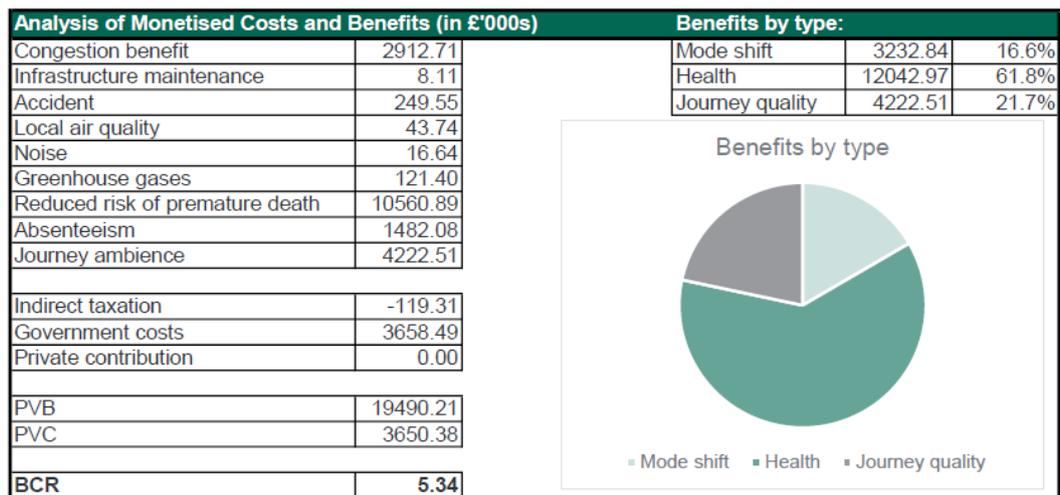
Annex 3

Output summaries for the DfT Active Mode Appraisal Toolkit (AMAT)

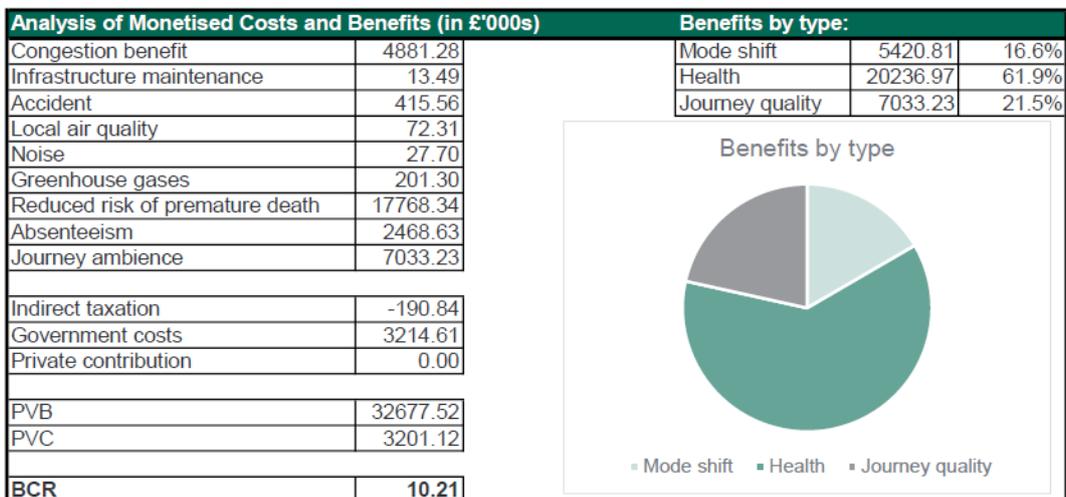
Central



Low



High



Example IMAT sheet



The countryside charity
Peak District and
South Yorkshire

The Rt Hon. Anne-Marie Trevelyan MP
Secretary of State for Transport
By email: A57LinkRoads@planninginspectorate.gov.uk

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
26th September 2022

Dear Secretary of State,

Determination of the A57 Link Roads TR010034

CPRE PDSY was Interested Party (IP) 20029243 at the Examination into the A57 Link Roads draft Development Consent Order (DCO). We fully engaged with the proceedings. At the end of the Examination, 16th May 2022, we submitted our closing position [REP12-033] which detailed why the scheme should be refused, based on evidence available to us at that time. Our consultant Keith Buchan of the Metropolitan Transport Research Unit (MTRU) also summarised our position [REP8-033] and submitted an open letter to the Examining Authority [REP12-038]. However, at the final deadline National Highways submitted new evidence to which IPs were not able to respond. Also, since the Examination closed, other evidence has emerged that is relevant to assessment of the impacts of the A57 Link Roads. Taking all this into account we believe that full scrutiny of the scheme has been compromised and it is not possible to determine the planning balance of the scheme as required by the Planning Act 2008 s.104 (7) and the 2017 EIA Regulations s.21 (1)(b). The outstanding issues are summarised below.

1. Low Carbon Travel for Longdendale and Glossopdale - a sustainable alternative

There are compelling reasons for a full review of the options' appraisal (as required by the Treasury Green Book) (a) for the scheme to comply with the 2017 EIA Regs s.14 (2) (d) and (b) to determine the best solution and value for money for the traffic and transport issues in the area. Our proposal *Low Carbon Travel for Longdendale and Glossopdale* (attached) provides a robust sustainable alternative. It meets the strategic objectives of the A57 Link Roads; is feasible and deliverable; and provides a 'very high' value for money with a BCR of 4.99 using our central assumptions. It also avoids the adverse effects of the proposed A57 Link Roads and distributes benefits over a wide area, in particular bringing relief to other villages.

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future

[REDACTED]
Registered Charity No.1094975 Registered Company No. 4496754



It was not possible to complete our *Low Carbon Travel for Longdendale and Glossopdale* during the Examination as National Highways (the Applicant) did not supply the necessary information. The majority of the proposal was available to the Examining Authority (ExA), but additional work had to be completed after the Examination closed. Having been prematurely rejected through the options' appraisal in 2014, our proposal requires full and proper testing before proceeding with the scheme.

2. Transport Assessment

At the close of the Examination the transport assessment was incomplete and its results were inconsistent. A WebTAG compliant appraisal was not presented as part of the DCO application, as required by NPSNN 4.5. The Transport Assessment Report did not allow full understanding of the traffic effects of the scheme or provide sufficient evidence to assess the impacts of the scheme against legal, policy and guidance requirements.

Serious unexplained disparities remained between observed and 'do minimum' 2025 modelled traffic flows [REP9-043; REP10-012; REP12-030, 3.1]. The Environmental Statement relies on the integrity of the data and modelled results in order to give an accurate assessment of the scheme's impact on the environment. The reliability, or otherwise, of the traffic model must be demonstrated before the scheme can be determined.

Major omissions in the investigation of the effects of the scheme remained;

- exclusion of most of Greater Manchester from the detailed modelling;
- exclusion of walking, cycling and public transport (except for rail trips by households with access to a car) from the modelling and the assessment [EV-041 at 1.05.26; REP7-034; REP8-033; REP9-040, p5, Q3.4];
- failure to apply GMCA's Transport Strategy 2040 Right Mix policy¹ and the DfT's Decarbonising Transport aim for 50% of trips in urban areas to be made by active travel by 2030 to the modelling [REP9-040, p3, Q3.3; REP7-034; REP7-036, pp2-4, Q3.3];

¹ [09.01.03](#) is referred to SD52 Allocations Tameside Issues Summary on page 10 JPA30.36; page32 JPA31.27; page 71 JPA32.49; page 72 JPA32.51 & JPA32.52; page 85 JPA32.96

President: Dame Fiona Reynolds



- failure to fully assess the cumulative effect of a proposed major development - Godley Green Garden Village - with the scheme (see para 7 below);
- exclusion of the major interventions planned for the M60 J24 Denton Island Interchange (see para 7 below).

All these omissions and disparities must be addressed before the scheme can be determined.

3. Assessment of Carbon Emissions

There were several omissions with respect to assessment of carbon emissions, all of which need addressing. We are concerned here with the assessment of the significance of the scheme's emissions against the annual carbon reduction targets and trajectories for transport in the UK's Net Zero Strategy (NZS). The Applicant agreed [REP9-027 9.79.15, bullet 3] *'that ... the Scheme should be considered against this, in accordance with NPSNN paragraphs 5.16-5.18 (and footnote 69)'*. Yet this assessment was not undertaken. Instead, the Applicant assumed that the UK NZS, and by extrapolation DfT's Decarbonising Transport, the UK's National Determined Contribution, and the UK's 6th carbon budget, would meet its required target [REP9-027, 8.10.5 *'The carbon budgets are supported by the policy commitments in the Net Zero Strategy which add further detail as to how the carbon budget and NDC will be achieved'*].

This confidence that the UK NZS policies will automatically lead to the UK being on course to meet its carbon budgets is now undermined by the recent successful court challenge² in July 2022. The UK NZS was found to be unlawful as it did not meet its obligations under Sections 13 and 14 of the Climate Change Act 2008 to enable Parliament to clearly evaluate how the Government intends to achieve its carbon budgets. The SoS for Business Energy and Industrial Strategy (BEIS) is now required to present to Parliament a report, which complies with section 14 of the Climate Change Act, by no later than 31 March 2023. This requires quantification of the effectiveness of the UK NZS policies. Therefore, the UK NZS is not a credible strategy and cannot be used to consider the significance of the scheme's carbon emissions until the Climate Change Committee and Parliament are satisfied that the revised UK NZS would be

² R (Friends of the Earth Ltd and ors) v Secretary of State for Business, Energy and Industrial Strategy
Neutral Citation Number: [2022] EWHC 1841 (Admin) 27 July 2022

President: Dame Fiona Reynolds



effective. Only then can compliance with the UK NZS and the significance of the scheme's carbon emissions be determined.

4. Effects of the scheme on Glossopdale

The Applicant's delayed and late response to the spurious traffic modelling results exposed the need for further investigation of the impacts of the scheme on Glossopdale. Three of the disparities were explained as due to local zone limitations [REP11-010 3.1a]. Such limitations are a good reason for using a more refined model of Glossopdale [REP12-030, 3.1]. Glossopdale should be remodelled with smaller zones and a finer network until all relevant traffic is represented, as required by NPSNN 4.6, which states '*Applications for road and rail projects should usually be supported by a local transport model to provide sufficiently accurate detail of the impacts of a project.*'

5. Impacts of the scheme on Transport for Greater Manchester (TfGM's) transport policies

TfGM engaged with the A57 Link Roads only through a Statement of Common Ground (SoCG) between itself and the Applicant. It had no other engagement with the Examination. The final version of the SoCG was published on the PINS website at the close of the Examination [REP12-009]; the previous version had been published four months earlier on Jan 14th.

In the final SoCG TfGM raised new issues which were inadequately addressed by the Applicant. The SoCG is explicit that TfGM did not engage in the development of the traffic modelling but is silent on whether TfGM is aware of the full impacts of the scheme on its citizens and its transport policies. The exclusion of public transport, walking and cycling, TfGM's Right Mix policy and most of Greater Manchester from the assessment was only exposed late on in the Examination and because of CPRE's work. A full assessment of the effects of the scheme on Greater Manchester must be prepared and submitted for scrutiny.

6. Impact of scheme on GHG emissions in Greater Manchester

In the SoCG TfGM expressed concerns about GHG emissions within Greater Manchester [REP12-009, pp 28-29]. In response (pp30-31) the Applicant '*prepared a table to split the predicted GHG emissions for Greater Manchester and for both EFT10.1 and 11*

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future



and has issued this to TfGM'. The table was not submitted to the Examination. After the Examination closed the Applicant shared a copy of this table with us. Both the totals and percentage increases are significantly greater within the Greater Manchester area. This is consistent with our point about the majority of impacts being in Greater Manchester. It is most unclear, given that a large part of Greater Manchester is modelled in less detail, how this affects the carbon emissions' results. Further scrutiny of the table is important for two reasons; (a) to understand the impacts of the scheme on GMCA's carbon budget and net zero target of 2038; and (b) because, as a first step, it shows that the Applicant could do an assessment of the scheme's effects on regional and local carbon budgets, as required by NPSNN 4.1. This it refused to do. The Applicant should now do a full and proper assessment for Greater Manchester, Tameside and High Peak, all of which have carbon budgets, on the scheme's effects on each carbon budget.

7. Impacts of Godley Green Garden Village with the scheme

The cumulative impact of the A57 Link Roads with the proposed major development of Godley Green Garden Village (GGGV) was assessed superficially by the Applicant in the DCO application as insignificant³. This conclusion is contrary to the evidence supporting GMCA's Joint Development Plan 'Places for Everyone' (PfE), underestimates the cumulative impact of the two developments and fails to mention the substantial impacts on the M67 Jn4 and M60 Jn24. Although the former is part of the A57 Link Roads project, the latter is not and no mitigation was suggested for it by National Highways through the DCO application. We presented evidence on these matters as the Examination closed [REP12-031, 10.20, 10.23 and 10.24], but new evidence has emerged/is emerging which must be taken into consideration before a decision about the scheme can be made.

- (a) Research undertaken by 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 GGGV [REP12-028]. That research has been updated through PfE and confirms that traffic generated by GGGV - allocation JPA31 - is *'likely to result in material implications on the operation of the SRN⁴'* at both the M67 J4

³ A57 Link Roads TR010034 ES Ch.15 Cumulative Effects Table 15-7 row 42 REP1-020

⁴ 09.01.26 Tameside Locality Assessments Addendum page 37/51, para 6.5.1

President: Dame Fiona Reynolds



roundabout and M60 J24 Denton Island. JPA31 with the ‘bypass’ (Mottram Moor Link Road) would cause both the M67 J4 and the M60 J24 to operate beyond capacity⁵. Mitigation without the bypass using partial signalisation and widening of the M67 J4 roundabout⁶ would restore operating capacity to the junction as the substantial increase in traffic accompanying the bypass would not be generated. All proposed options to mitigate congestion at M60 J24 fail to bring the junction within operating capacity, leading to continuing air pollution. These results challenge the evidence the Applicant presented to the DCO Examination.

(b) National Highways submitted on 28th July 2022 a formal recommendation to TMBC’s planning application 21/01171/OUT for GGGV that planning permission is not granted until October 28th 2022⁷; it does not have confidence that there would not be a severe impact to the SRN, should this development proceed. This extends a previous recommendation not to grant permission and challenges the conclusion presented to the DCO Examination.

(c) Further investigation is being undertaken by National Highways and TfGM to produce ‘*Highways England Future Work Programme*’ to inform PfE. This examines the potential implications of the plan on the SRN, including every SRN link, junction, merge and diverge arrangement across Greater Manchester⁸. National Highways 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*’⁹. Thus, this work appears crucial to informing and evaluating the authenticity of the assessment of the A57 Link Roads.

⁵ 09.01.26 Tameside Locality Assessments Addendum page 38/51, Table 13

⁶ As proposed in *Low Carbon Travel for Longendale and Glossopdale*

⁷ https://publicaccess.tameside.gov.uk/online-applications/files/7982E563901C85BCDC19119B2D9C0117/pdf/21_01171_OUT-CONSULTEE_COMMENT_-_NATIONAL_HIGHWAYS-1555101.pdf

⁸ GMCA3.1, 27 May 2022, [REDACTED] PfE response to Inspectors notes IN3, IN3.1 and IN3.2: preliminary questions to GMCA: legal, procedural and other general matters, page 125

⁹ GMCA’s Joint Development Plan, Examination of Places for Everyone, IN8 page 18 Issue 3.3

[REDACTED]
President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future

[REDACTED]
Registered Charity No.1094975 Registered Company No. 4496754



The countryside charity
Peak District and
South Yorkshire

The inconsistency between National Highways' and TfGM's evidence as to the cumulative impacts of the A57 Link Roads with GGGV must be resolved. The completed *Highways England Future Work Programme*, and a full and proper assessment of the cumulative impacts of GGGV with the A57 Link Roads should be available for scrutiny by IPs and yourself as the decision-maker before a decision is made about the A57 Link Roads. This is reinforced by what we demonstrated about the traffic modelling as outlined in paragraph 2 above.

8. Air quality assessment at Brookfield

Three working days before the Examination closed, the Applicant submitted the results of a sensitivity test applied at HPBC's request to an area adjacent to the scheme. This showed that human health receptors would be exposed to illegal levels of nitrous dioxide with the scheme [REP11-011]. In the SoCG between HPBC and the Applicant submitted at the close of the Examination [REP12-008, 9.24] the matter was left as 'not agreed'. *'Discussions are ongoing regarding a mechanism for the Applicant to support HPBC to better understand the baseline air quality at the property.'* IPs have not been privy to any of these discussions or the outcome of them. This is of great concern as two AQMAs in Glossopdale and the Natura 2000 sites adjacent to the A628T were excluded from assessment. Their exclusion depended on traffic flows not meeting the required thresholds for assessment, but the traffic model was refined to explicitly reduce the air pollution at both AQMAs. In this context and the newly emerging further evidence of air pollution, the air quality effects of the scheme need further scrutiny.

9. The Applicant is in breach of its licence conditions

Our report detailing how the Applicant is in breach of its licence conditions was submitted to the Office of Rail and Road, as the Highways Monitor, and copied to your predecessor, Grant Shapps, as SoS for Transport. It is attached to this letter and provides evidence relevant to the determination of the scheme. In brief, the Applicant misled the public through both statutory consultations to the extent that it was not possible for those consulted to come to an informed opinion about the scheme. Throughout the examination, as IPs, we were faced with obfuscation and non-engagement by the Applicant with the questions and substantive evidence which we provided. The Applicant has also failed to provide effective stewardship of the long term operation and integrity of the A628T corridor. Through progressing the A57 Link Roads it also failed to ensure efficiency and value for money, to protect and

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future

Registered Charity No.1094975 Registered Company No. 4496754



The countryside charity
Peak District and
South Yorkshire

improve the safety of the network, to co-operate with local authorities, to minimise the impacts on the environment and to have due regard for Government policy. The non-compliance described represents not only a serious malfeasance but also demonstrates that the process through which the A57 Link Roads has passed has been both unlawful and encumbered by participatory unfairness making any decision which might be made to proceed with the scheme untenable and open to challenge.

Conclusion

The Planning Act 2008, s.104 (7), as reflected in NPSNN 4.1, and the 2017 EIA Regulations s.21 (1)(b) require the decision-maker to weigh the adverse impacts of a proposed development against its benefits. We have shown that all the above issues are unresolved with respect to the impacts of the A57 Link Roads. As the impacts of the scheme cannot properly be determined due to lack of evidence, or poor evidence, or new evidence any decision to proceed with the scheme would be untenable.

We therefore strongly urge you to refuse the A57 Link Roads DCO and ask National Highways to urgently commence:

- 1 Repeating the local options appraisal afresh, with our *Low Carbon Travel for Longdendale and Glossopdale* measures fully developed and evaluated in light of the established local and national policies for achieving healthy and sustainable travel.
- 2 Developing a similar strategic approach for the whole corridor, reflecting
 - a. National Government's pathway to carbon reduction, in particular the DfT's Decarbonising Transport and, when established as effective, the UK's NZS;
 - b. The special nature of the National Park and National Park Authority's policies for traffic management;
 - c. The transport policies of cities which the road is designed to serve, including Sheffield as well as Manchester.

Yours sincerely,



Anne Robinson
Campaigner

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future



Registered Charity No.1094975 Registered Company No. 4496754

Submission number: 9

Date submission received by PINS: 26 October 2022

Name: CPRE PDSY

Barrowman, Spencer

From: Anne Robinson [REDACTED]
Sent: 26 October 2022 12:24
To: Mark Harper
Cc: TRANSPORTINFRASTRUCTURE; A57 Link Roads; Katherine Fletcher
Subject: Determination of the A57 Link Roads
Attachments: 2022-10-26 CPRE PDSY to SoS re TR010034 A57 Link Roads.pdf; 2022-8-25 CPRE PDSY report on National Highways Non Compliance with Licence.pdf; 2022-9-15 Low Carbon Travel for Longdendale and Glossopdale Summary.pdf

Dear Secretary of State

Congratulations on your appointment as Secretary of State for Transport. We look forward to working with you.

Please find attached a letter and two documents that we urge you to take into consideration as you determine the A57 Link Roads. The letter outlines where full scrutiny of the scheme through its examination has been compromised, making it impossible for the decision-maker to determine the planning balance of the scheme as required by the Planning Act 2008 s.104 (7) and the 2017 EIA Regulations s.21 (1)(b).

The second attachment is a report of National Highways' noncompliance with its licence obligations. The report presents substantial evidence of poor behaviour which has prejudiced engagement with stakeholders and the public, and calls into question not only the integrity of the company but also the veracity of the evidence for the Development Consent Order for the A57 Link Roads. There is also evidence of failure to properly steward the future of this part of the Strategic Route Network, to ensure value for money, to protect and improve safety on the strategic and local road network, to co-operate with stakeholders, to conform to the principles of sustainable development and to comply with Government policy. The non-compliance described represents not only a serious malfeasance but also demonstrates that the process through which the A57 Link Roads has passed has been both unlawful and encumbered by participatory unfairness making untenable any decision which might be made to proceed with the scheme. Today we received a response to our previous submission of the report from Kate Atkin of the Transport Infrastructure Planning Unit, indicating the report would be logged as post-examination correspondence. Nevertheless, as the single shareholder with overall political responsibility for the company's performance, we thought it important to bring the report directly to your attention.

The third attachment is a summary of *Low Carbon Travel for Longdendale and Glossopdale*, which provides a robust sustainable alternative to the A57 Link Roads - the full report has been submitted to PINS¹. Our proposed solution is tailored to local needs; meets the strategic objectives of the A57 Link Roads; is feasible and deliverable; and provides 'very high' value for money – for every pound invested the public purse would get a return of £4.99. It also avoids the adverse effects of the proposed A57 Link Roads and distributes benefits over a wide area, in particular bringing relief to other villages along the trunk route and to Glossopdale. Having been prematurely rejected by National Highways through the options' appraisal in 2014, *Low Carbon Travel for Longdendale and Glossopdale* requires full and proper testing, through a fresh options' appraisal conducted within the context of the whole of the South Pennines strategic corridor.

We urge you to give full consideration to all these documents when determining the A57 Link Roads.

Kind regards

Anne

[\[1\]https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001672-2022-9-22%20TR010034%20Low%20Carbon%20Travel%20for%20Longdendale%20&%20Glossopdale%20CPRE%20PSY.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001672-2022-9-22%20TR010034%20Low%20Carbon%20Travel%20for%20Longdendale%20&%20Glossopdale%20CPRE%20PSY.pdf)

Anne Robinson
Campaigner
CPRE Peak District and South Yorkshire

p: [REDACTED]

a: Victoria Hall, 37 Stafford Road, Sheffield, S2 2SF



The countryside
Peak District and
South Yorkshire

Run and managed by CPRE Peak District and South Yorkshire. Reg. Charity No 1094975. Reg. Company No 4496754.

This e-mail is confidential and may well also be legally privileged. If you have received it in error, you are on notice of its status. Please notify the sender immediately by reply e-mail to and then delete this message from your system. Any review, dissemination, distribution, copying or other use is strictly prohibited. Any views expressed in this message are those of the individual sender and may not necessarily reflect the views of the Campaign to Protect Rural England (CPRE) or its associated companies.



The countryside charity
Peak District and
South Yorkshire

The Rt Hon. Mark Harper MP
Secretary of State for Transport
By email: mark.harper@dft.gov.uk

37 Stafford Road
Sheffield S2 2SF

Tel: [REDACTED]

26th September 2022

Dear Secretary of State,

Determination of the A57 Link Roads TR010034

CPRE PDSY was Interested Party (IP) 20029243 at the Examination into the A57 Link Roads draft Development Consent Order (DCO). We fully engaged with the proceedings. At the end of the Examination, 16th May 2022, we submitted our closing position [REP12-033] which detailed why the scheme should be refused, based on evidence available to us at that time. Our consultant Keith Buchan of the Metropolitan Transport Research Unit (MTRU) also summarised our position [REP8-033] and submitted an open letter to the Examining Authority [REP12-038]. However, at the final deadline National Highways submitted new evidence to which IPs were not able to respond. Also, since the Examination closed, other evidence has emerged that is relevant to assessment of the impacts of the A57 Link Roads. Taking all this into account we believe that full scrutiny of the scheme has been compromised and it is not possible to determine the planning balance of the scheme as required by the Planning Act 2008 s.104 (7) and the 2017 EIA Regulations s.21 (1)(b). The outstanding issues are summarised below.

1. Low Carbon Travel for Longdendale and Glossopdale - a sustainable alternative

There are compelling reasons for a full review of the options' appraisal (as required by the Treasury Green Book) (a) for the scheme to comply with the 2017 EIA Regs s.14 (2) (d) and (b) to determine the best solution and value for money for the traffic and transport issues in the area. Our proposal *Low Carbon Travel for Longdendale and Glossopdale* (attached) provides a robust sustainable alternative. It meets the strategic objectives of the A57 Link Roads; is feasible and deliverable; and provides a 'very high' value for money with a BCR of 4.99 using our central assumptions. It also avoids the adverse effects of the proposed A57 Link Roads and distributes benefits over a wide area, in particular bringing relief to other villages.

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future

[REDACTED]
Registered Charity No.1094975 Registered Company No. 4496754



It was not possible to complete our *Low Carbon Travel for Longdendale and Glossopdale* during the Examination as National Highways (the Applicant) did not supply the necessary information. The majority of the proposal was available to the Examining Authority (ExA), but additional work had to be completed after the Examination closed. Having been prematurely rejected through the options' appraisal in 2014, our proposal requires full and proper testing before proceeding with the scheme.

2. Transport Assessment

At the close of the Examination the transport assessment was incomplete and its results were inconsistent. A WebTAG compliant appraisal was not presented as part of the DCO application, as required by NPSNN 4.5. The Transport Assessment Report did not allow full understanding of the traffic effects of the scheme or provide sufficient evidence to assess the impacts of the scheme against legal, policy and guidance requirements.

Serious unexplained disparities remained between observed and 'do minimum' 2025 modelled traffic flows [REP9-043; REP10-012; REP12-030, 3.1]. The Environmental Statement relies on the integrity of the data and modelled results in order to give an accurate assessment of the scheme's impact on the environment. The reliability, or otherwise, of the traffic model must be demonstrated before the scheme can be determined.

Major omissions in the investigation of the effects of the scheme remained;

- exclusion of most of Greater Manchester from the detailed modelling;
- exclusion of walking, cycling and public transport (except for rail trips by households with access to a car) from the modelling and the assessment [EV-041 at 1.05.26; REP7-034; REP8-033; REP9-040, p5, Q3.4];
- failure to apply GMCA's Transport Strategy 2040 Right Mix policy¹ and the DfT's Decarbonising Transport aim for 50% of trips in urban areas to be made by active travel by 2030 to the modelling [REP9-040, p3, Q3.3; REP7-034; REP7-036, pp2-4, Q3.3];

¹ [09.01.03](#) is referred to SD52 Allocations Tameside Issues Summary on page 10 JPA30.36; page32 JPA31.27; page 71 JPA32.49; page 72 JPA32.51 & JPA32.52; page 85 JPA32.96

President: Dame Fiona Reynolds



- failure to fully assess the cumulative effect of a proposed major development - Godley Green Garden Village - with the scheme (see para 7 below);
- exclusion of the major interventions planned for the M60 J24 Denton Island Interchange (see para 7 below).

All these omissions and disparities must be addressed before the scheme can be determined.

3. Assessment of Carbon Emissions

There were several omissions with respect to assessment of carbon emissions, all of which need addressing. We are concerned here with the assessment of the significance of the scheme's emissions against the annual carbon reduction targets and trajectories for transport in the UK's Net Zero Strategy (NZS). The Applicant agreed [REP9-027 9.79.15, bullet 3] *'that ... the Scheme should be considered against this, in accordance with NPSNN paragraphs 5.16-5.18 (and footnote 69)'*. Yet this assessment was not undertaken. Instead, the Applicant assumed that the UK NZS, and by extrapolation DfT's Decarbonising Transport, the UK's National Determined Contribution, and the UK's 6th carbon budget, would meet its required target [REP9-027, 8.10.5 *'The carbon budgets are supported by the policy commitments in the Net Zero Strategy which add further detail as to how the carbon budget and NDC will be achieved'*].

This confidence that the UK NZS policies will automatically lead to the UK being on course to meet its carbon budgets is now undermined by the recent successful court challenge² in July 2022. The UK NZS was found to be unlawful as it did not meet its obligations under Sections 13 and 14 of the Climate Change Act 2008 to enable Parliament to clearly evaluate how the Government intends to achieve its carbon budgets. The SoS for Business Energy and Industrial Strategy (BEIS) is now required to present to Parliament a report, which complies with section 14 of the Climate Change Act, by no later than 31 March 2023. This requires quantification of the effectiveness of the UK NZS policies. Therefore, the UK NZS is not a credible strategy and cannot be used to consider the significance of the scheme's carbon emissions until the Climate Change Committee and Parliament are satisfied that the revised UK NZS would be

² R (Friends of the Earth Ltd and ors) v Secretary of State for Business, Energy and Industrial Strategy
Neutral Citation Number: [2022] EWHC 1841 (Admin) 27 July 2022

President: Dame Fiona Reynolds



effective. Only then can compliance with the UK NZS and the significance of the scheme's carbon emissions be determined.

4. Effects of the scheme on Glossopdale

The Applicant's delayed and late response to the spurious traffic modelling results exposed the need for further investigation of the impacts of the scheme on Glossopdale. Three of the disparities were explained as due to local zone limitations [REP11-010 3.1a]. Such limitations are a good reason for using a more refined model of Glossopdale [REP12-030, 3.1]. Glossopdale should be remodelled with smaller zones and a finer network until all relevant traffic is represented, as required by NPSNN 4.6, which states '*Applications for road and rail projects should usually be supported by a local transport model to provide sufficiently accurate detail of the impacts of a project.*'

5. Impacts of the scheme on Transport for Greater Manchester (TfGM's) transport policies

TfGM engaged with the A57 Link Roads only through a Statement of Common Ground (SoCG) between itself and the Applicant. It had no other engagement with the Examination. The final version of the SoCG was published on the PINS website at the close of the Examination [REP12-009]; the previous version had been published four months earlier on Jan 14th.

In the final SoCG TfGM raised new issues which were inadequately addressed by the Applicant. The SoCG is explicit that TfGM did not engage in the development of the traffic modelling but is silent on whether TfGM is aware of the full impacts of the scheme on its citizens and its transport policies. The exclusion of public transport, walking and cycling, TfGM's Right Mix policy and most of Greater Manchester from the assessment was only exposed late on in the Examination and because of CPRE's work. A full assessment of the effects of the scheme on Greater Manchester must be prepared and submitted for scrutiny.

6. Impact of scheme on GHG emissions in Greater Manchester

In the SoCG TfGM expressed concerns about GHG emissions within Greater Manchester [REP12-009, pp 28-29]. In response (pp30-31) the Applicant '*prepared a table to split the predicted GHG emissions for Greater Manchester and for both EFT10.1 and 11*

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future



and has issued this to TfGM'. The table was not submitted to the Examination. After the Examination closed the Applicant shared a copy of this table with us. Both the totals and percentage increases are significantly greater within the Greater Manchester area. This is consistent with our point about the majority of impacts being in Greater Manchester. It is most unclear, given that a large part of Greater Manchester is modelled in less detail, how this affects the carbon emissions' results. Further scrutiny of the table is important for two reasons; (a) to understand the impacts of the scheme on GMCA's carbon budget and net zero target of 2038; and (b) because, as a first step, it shows that the Applicant could do an assessment of the scheme's effects on regional and local carbon budgets, as required by NPSNN 4.1. This it refused to do. The Applicant should now do a full and proper assessment for Greater Manchester, Tameside and High Peak, all of which have carbon budgets, on the scheme's effects on each carbon budget.

7. Impacts of Godley Green Garden Village with the scheme

The cumulative impact of the A57 Link Roads with the proposed major development of Godley Green Garden Village (GGGV) was assessed superficially by the Applicant in the DCO application as insignificant³. This conclusion is contrary to the evidence supporting GMCA's Joint Development Plan 'Places for Everyone' (PfE), underestimates the cumulative impact of the two developments and fails to mention the substantial impacts on the M67 Jn4 and M60 Jn24. Although the former is part of the A57 Link Roads project, the latter is not and no mitigation was suggested for it by National Highways through the DCO application. We presented evidence on these matters as the Examination closed [REP12-031, 10.20, 10.23 and 10.24], but new evidence has emerged/is emerging which must be taken into consideration before a decision about the scheme can be made.

- (a) Research undertaken by 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 GGGV [REP12-028]. That research has been updated through PfE and confirms that traffic generated by GGGV - allocation JPA31 - is *'likely to result in material implications on the operation of the SRN⁴'* at both the M67 J4

³ A57 Link Roads TR010034 ES Ch.15 Cumulative Effects Table 15-7 row 42 REP1-020

⁴ 09.01.26 Tameside Locality Assessments Addendum page 37/51, para 6.5.1

President: Dame Fiona Reynolds



roundabout and M60 J24 Denton Island. JPA31 with the ‘bypass’ (Mottram Moor Link Road) would cause both the M67 J4 and the M60 J24 to operate beyond capacity⁵. Mitigation without the bypass using partial signalisation and widening of the M67 J4 roundabout⁶ would restore operating capacity to the junction as the substantial increase in traffic accompanying the bypass would not be generated. All proposed options to mitigate congestion at M60 J24 fail to bring the junction within operating capacity, leading to continuing air pollution. These results challenge the evidence the Applicant presented to the DCO Examination.

(b) National Highways submitted on 28th July 2022 a formal recommendation to TMBC’s planning application 21/01171/OUT for GGGV that planning permission is not granted until October 28th 2022⁷; it does not have confidence that there would not be a severe impact to the SRN, should this development proceed. This extends a previous recommendation not to grant permission and challenges the conclusion presented to the DCO Examination.

(c) Further investigation is being undertaken by National Highways and TfGM to produce ‘*Highways England Future Work Programme*’ to inform PfE. This examines the potential implications of the plan on the SRN, including every SRN link, junction, merge and diverge arrangement across Greater Manchester⁸. National Highways 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*’⁹. Thus, this work appears crucial to informing and evaluating the authenticity of the assessment of the A57 Link Roads.

⁵ 09.01.26 Tameside Locality Assessments Addendum page 38/51, Table 13

⁶ As proposed in *Low Carbon Travel for Longendale and Glossopdale*

⁷ https://publicaccess.tameside.gov.uk/online-applications/files/7982E563901C85BCDC19119B2D9C0117/pdf/21_01171_OUT-CONSULTEE_COMMENT_-_NATIONAL_HIGHWAYS-1555101.pdf

⁸ GMCA3.1, 27 May 2022, [REDACTED] PfE response to Inspectors notes IN3, IN3.1 and IN3.2: preliminary questions to GMCA: legal, procedural and other general matters, page 125

⁹ GMCA’s Joint Development Plan, Examination of Places for Everyone, IN8 page 18 Issue 3.3

[REDACTED]
President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future



The countryside charity
Peak District and
South Yorkshire

The inconsistency between National Highways' and TfGM's evidence as to the cumulative impacts of the A57 Link Roads with GGGV must be resolved. The completed *Highways England Future Work Programme*, and a full and proper assessment of the cumulative impacts of GGGV with the A57 Link Roads should be available for scrutiny by IPs and yourself as the decision-maker before a decision is made about the A57 Link Roads. This is reinforced by what we demonstrated about the traffic modelling as outlined in paragraph 2 above.

8. Air quality assessment at Brookfield

Three working days before the Examination closed, the Applicant submitted the results of a sensitivity test applied at HPBC's request to an area adjacent to the scheme. This showed that human health receptors would be exposed to illegal levels of nitrous dioxide with the scheme [REP11-011]. In the SoCG between HPBC and the Applicant submitted at the close of the Examination [REP12-008, 9.24] the matter was left as 'not agreed'. *'Discussions are ongoing regarding a mechanism for the Applicant to support HPBC to better understand the baseline air quality at the property.'* IPs have not been privy to any of these discussions or the outcome of them. This is of great concern as two AQMAs in Glossopdale and the Natura 2000 sites adjacent to the A628T were excluded from assessment. Their exclusion depended on traffic flows not meeting the required thresholds for assessment, but the traffic model was refined to explicitly reduce the air pollution at both AQMAs. In this context and the newly emerging further evidence of air pollution, the air quality effects of the scheme need further scrutiny.

9. The Applicant is in breach of its licence conditions

Our report detailing how the Applicant is in breach of its licence conditions was submitted to the Office of Rail and Road, as the Highways Monitor in August 2022. It is attached to this letter and provides evidence relevant to the determination of the scheme. In brief, the Applicant misled the public through both statutory consultations to the extent that it was not possible for those consulted to come to an informed opinion about the scheme. Throughout the examination, as IPs, we were faced with obfuscation and non-engagement by the Applicant with the questions and substantive evidence which we provided. The Applicant has also failed to provide effective stewardship of the long term operation and integrity of the A628T corridor. Through progressing the A57 Link Roads it also failed to ensure efficiency and value for money, to protect and improve the safety of the network, to co-operate with local

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future

Registered Charity No.1094975 Registered Company No. 4496754



The countryside charity
Peak District and
South Yorkshire

authorities, to minimise the impacts on the environment and to have due regard for Government policy. The non-compliance described represents not only a serious malfeasance but also demonstrates that the process through which the A57 Link Roads has passed has been both unlawful and encumbered by participatory unfairness making any decision which might be made to proceed with the scheme untenable and open to challenge.

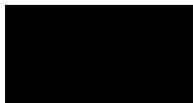
Conclusion

The Planning Act 2008, s.104 (7), as reflected in NPSNN 4.1, and the 2017 EIA Regulations s.21 (1)(b) require the decision-maker to weigh the adverse impacts of a proposed development against its benefits. We have shown that all the above issues are unresolved with respect to the impacts of the A57 Link Roads. As the impacts of the scheme cannot properly be determined due to lack of evidence, or poor evidence, or new evidence any decision to proceed with the scheme would be untenable.

We therefore strongly urge you to refuse the A57 Link Roads DCO and ask National Highways to urgently commence:

- 1 Repeating the local options appraisal afresh, with our *Low Carbon Travel for Longdendale and Glossopdale* measures fully developed and evaluated in light of the established local and national policies for achieving healthy and sustainable travel.
- 2 Developing a similar strategic approach for the whole corridor, reflecting
 - a. National Government's pathway to carbon reduction, in particular the DfT's Decarbonising Transport and, when established as effective, the UK's NZS;
 - b. The special nature of the National Park and National Park Authority's policies for traffic management;
 - c. The transport policies of cities which the road is designed to serve, including Sheffield as well as Manchester.

Yours sincerely,



Anne Robinson
Campaigner

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future



Registered Charity No.1094975 Registered Company No. 4496754

NATIONAL HIGHWAYS NON-COMPLIANCE WITH ITS LICENCE CONDITIONS

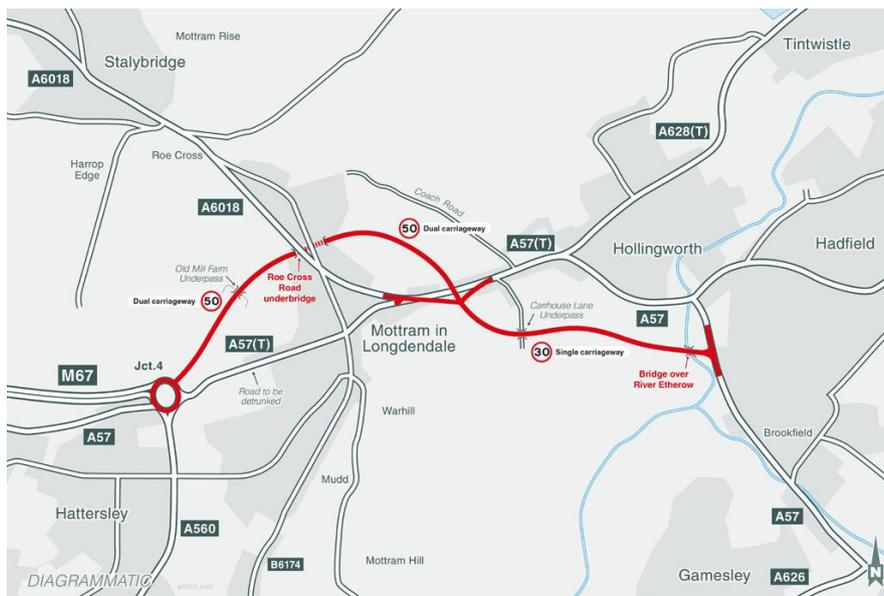
- 1 CPRE PDSY is a branch of CPRE, the countryside charity. We are also as the Friends of the Peak District, the National Park society for the Peak District National Park and a member of the Campaign for National Parks. We believe in a thriving, beautiful countryside, rich in nature and playing a crucial role in the response to the climate emergency. Our goal is a countryside that's valued, enjoyed and understood by, and accessible to, everyone, wherever they live. Through all our work we look at the role of our countryside in tackling the climate emergency, including seeking ways to increase resilience and reduce impact.
- 2 Through our engagement with Highways England/National Highways' (NH) plans for major road building impacting on the Peak District we have found that the company has not complied with several of its licence conditions, some of which are statutory directions. This relates particularly to the development and progression of its proposed A57 Link Roads¹. The non-compliance described below represents not only a serious malfeasance but also demonstrates that the process through which the A57 Link Roads has passed has been both unlawful and encumbered by participatory unfairness making any decision which might be made to proceed with the scheme untenable. As the Highways Monitor, we understand that the Office of Rail and Road (ORR) monitors National Highways' compliance with the statutory directions and regard to the guidance issued by the Secretary of State for Transport (SoS) in its licence. We are therefore bringing this non-compliance to your attention.
- 3 **With respect to the A57 Link Roads we urge the ORR to assess NH's performance in the light of this representation to you and report your findings to the SoS before they make a decision on the scheme in mid-November 2022. More generally we urge the ORR to enforce behaviour that is expected of a public body. In particular, we suggest that the ORR a) insists on, or provides, much more robust assessment and monitoring of scheme development from options appraisal through project business case, and b) reviews or instigates a review of the NSIP proposal and DCO process, for example in line with paragraph 29 below.**
- 4 The document is laid out as follows
 - (A) Background
 - (B) Behaviour unacceptable in a public body, Licence para 5.19, as demonstrated by
 - (1) Statutory consultations
 - (2) Transport Assessment Report
 - (3) NH's response to CPRE PDSY's requests for information

¹ The scheme appears in ORR's Annual Assessment of NH's Performance 2021-2022, Tables B4 and B11 <https://www.orr.gov.uk/sites/default/files/2022-07/annual-assessment-of-national-highways-performance-2022-print.pdf>

- (4) Examination of Development Consent Order (DCO) application
- (C) Failure to comply with statutory directions in the Licence, paras 4.1 management of Strategic Road Network (SRN), 4.2 general duties on Licence holder and 5.29 Government policy
- (D) Failure to have regard to guidance in the Licence, paras 5.15 and 5.23
- (E) Conclusions.

BACKGROUND

- 5 The A57 Link Roads (the scheme) developed as NH's favoured option out of the 2015 Trans-Pennine Routes Feasibility Study². It is a dual carriageway bypass of Mottram between the M67 and the A57T, continuing as single carriageway extension A57T to A57 to Glossop, which would effectively bypass part of the A57 called Woolley Lane (see figure below). National Highways (or Highways England as it was) held statutory consultations on the scheme in 2018³ and 2020⁴. (The scheme was called the Trans-Pennine Upgrade until 2020 when it became the A57 Link Roads.)



- 6 As a Nationally Significant Infrastructure Project (NSIP) the scheme's draft DCO was submitted to the Planning Inspectorate (PINS) on 28th June 2021, when all the application documents became publicly available, and was accepted for examination on 26th July 2021. The examination of the DCO application was conducted between 16th November 2021 and 16th May 2022. The Examining Authority (ExA)'s recommendations must be made by 16th August 2022 and the SoS's decision must be made by 16th November 2022.

² <https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports>

- 7 CPRE employed a professional transport planner, Keith Buchan of MTRU (Metropolitan Transport Research Unit), to develop our alternative proposals to the scheme for consideration through the 2015 Trans-Pennine Routes Feasibility Study and to give evidence to the Examination-in-Public (EiP)⁵. MTRU's engagement in the EiP led to consistent and expert challenge by a professional transport planner with extensive experience.
- 8 As a branch of CPRE we have had a 50 year history of engagement with the scheme in all its iterations. The evidence we present here is focused on our engagement with development of the scheme over the last 8 years; a comprehensive assessment of both the 2018⁶ and 2020⁷ statutory consultations which was submitted to the PINS as evidence of the inadequacy of the consultations; and full engagement as an Interested Party (IP) at the EiP into the scheme. We objected to the scheme on the basis that sustainable alternatives exist that should be trialled before unsustainable road building is pursued. We are not here concerned about the scheme and its impacts except in so far as they demonstrate non-compliance by NH.
- 9 All the DCO documents for the scheme appear on the PINS website⁸. References beginning REP, EV, APP, AoC or AS refer to documents in the EiP library. The library lists all documents accepted into the EiP and provides links to each one. See footnote for link to the Library⁹.

Framework for assessment of NH's performance

- 10 The expectations of NH run higher than the conditions of its licence. They are spelt out in the Foreword to the licence by the Minister for Transport at the time: *'Government remains responsible for strategic roads and Ministers will continue to be accountable for making sure that the network is managed responsibly, in a way that safeguards value for public investment, meeting the needs of road users, securing individual well-being and*

⁵ Our alternative package comprised exclusion of through-traffic of HGVs through the Peak District National Park, including on the A57/A628/A616T with sustainable transport measures.

⁶ <https://infrastructure.planninginspectorate.gov.uk/projects/north-west/a57-link-roads-previously-known-as-trans-pennine-upgrade-programme/?ipcsection=advice&ipcadvise=73c2ad0ecc>

⁷ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-Advice-00007-1-A57-Link-Roads-Email_Redacted.pdf On 24th May 2021 we submitted additional information to PINS about the inadequacy of the consultation which appears to have been removed from the PINS website but a summary can be found in REP2-069 Appendix B.

⁸ <https://infrastructure.planninginspectorate.gov.uk/projects/north-west/a57-link-roads-previously-known-as-trans-pennine-upgrade-programme/?ipcsection=docs>

⁹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-000603-A57%20Link%20Road%20Examination%20Library%20Published.pdf>

supporting economic purpose, both today and for future generations... This document represents a crucial part of that system, by setting out the Secretary of State's statutory directions and guidance to Highways England. It makes clear, to both Highways England and the wider community of road users and stakeholders, what we expect Highways England to achieve and how they must behave in discharging their duties and in delivering our vision and plans for the network, set out in the Road Investment Strategy.

- 11 *The Licence emphasises that the role of Highways England is about more than just complying with the letter of the law. We expect the company to go the extra mile in the way it engages with road users and collaborates with other organisations to develop shared solutions. And they must take a lead in promoting and improving the role and performance of roads in respect of broader communal responsibilities, such as the aesthetics of design, safety and the environment, as well as driving forward wider progress on technology and innovation.'*
- 12 In addition the baseline standard of the Seven Principles of Public Life (the Nolan Principles) applies to anyone who works as a public officeholder, including all people appointed to work in non-departmental public bodies, such as NH¹⁰. Five of the seven principles are key to our assessment. These are:
- Objectivity - Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
 - Accountability - Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
 - Openness - Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
 - Honesty - Holders of public office should be truthful.
 - Leadership - Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.
- 13 It is within this context that we have assessed NH's performance, under the headings (B) Behaviour Unacceptable in a Public Body, (C) Failure to Comply with Statutory Directions in the Licence, and (D) Failure to Have Due Regard to Guidance in the Licence.

¹⁰ <https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-of-public-life--2>

(B) BEHAVIOUR UNACCEPTABLE IN A PUBLIC BODY

- 14 We start with the licence condition that applies to NH's interface with the public. Although para 5.19 is not a statutory direction, it should be a golden thread through all NH's interactions with organisations and the public, and we quote it below for reference.

Licence Para 5.19 In complying with 5.17 and 5.18, the Licence holder should co-operate with other persons or organisations in a way which is demonstrably:

- (a) Open and transparent – involving relevant stakeholders, ensuring that essential information is available to affected and interested parties, and that the processes for engagement and communication are clear;**
- (b) Positive and responsive – seek to build trusting and effective working relationships with key partners and stakeholders, engaging with due efficiency and economy and in a timely manner;**
- (c) Collaborative – working with others to align national and local plans and investments, balance national and local needs and support better end-to-end journeys for road users.**

- 15 We show below, through (1) the statutory consultations; (2) the Transport Assessment Report; (3) NH's response to CPRE's requests; and (4) the EiP, how NH omitted critical evidence that was crucial to understanding the scheme's impacts, presented biased evidence, misrepresented evidence, refused to share information, was reluctant to give straight answers to questions and failed to follow best practice.

(1) The statutory consultations

- 16 Through both statutory consultations NH withheld and refused to share essential information. There was insufficient information to allow the public to make an informed assessment of the impacts of the scheme. Some of the statements were misleading and bordered on the dishonest. NH steered the consultations away from over-arching fundamental questions, such as the need for the scheme and possible alternatives, towards detailed matters of design.

2018 statutory consultation

- 17 No transport assessment or traffic modelling results and little information as to the impacts of the scheme on the environment or the community¹¹ were made available during this first statutory consultation. As a result High Peak Borough Council,

¹¹ We brought this to the attention of the Planning Inspectorate and relevant local authorities by letter dated 11th March 2018.

Derbyshire County Council and the Peak District National Park Authority all submitted holding objections.

18 In view of these omissions, we asked Highways England if it would make traffic data available for the next consultation. It promised to do so¹² but the promise was never honoured.

2020 statutory consultation

19 The second 2020 statutory consultation was held during a complete lockdown for the Covid pandemic. NH claimed to have mitigated the effect of the restrictions but comparison of the 2018 and 2020 consultations revealed the only 'mitigation' was the addition of 3 non-interactive webinars. These provided wholly inadequate replacements for face-to-face events. In addition, people were expected to view hard copies of the documents in three cramped local post offices (as local authority offices were closed) or to view the documents on line.

20 A DCO applicant has a duty to consult the community in accordance with the Statement of Community Consultation (SoCC)¹³. The SoCC stated '*we're publishing ... consultation material to assist well-informed responses to the consultation... The report will provide information about the potential environmental effects of the scheme.*' The consultation material comprised a colour brochure delivered to the majority of households in the area, a non-technical summary and three volumes of the Preliminary Environment Information Report (PEIR). The SoCC-promised delivery of a 37-page document of FAQ to the majority of households in the area did not occur. Air pollution, noise and carbon emissions were the only impacts assessed and then only partially. The omissions and misrepresentations from the consultation were extensive and are detailed in Appendix A. They included no transport assessment, traffic data or traffic modelling; no mention of the adverse impacts on Glossopdale, on the Peak District National or on the Green Belt; a misleading impression that road safety would improve; and a brochure which focused to the exclusion of all else on the immediate benefits to residents of Mottram and on Woolley Lane – a sales pitch for the scheme, not an honest presentation of its effects.

21 Just as with the preceding statutory consultation in 2018, in the 2020 statutory consultation neither the public nor the statutory consultees had the information available to them to make informed responses. Once again Derbyshire County Council,

¹² Email to CPRE PDSY 23rd March 2020 '*Thank you for your email dated 19 February 2020 regarding the article about the Trans Pennine Upgrade in the Manchester Evening News.... I can confirm that we will honour our promise to present the plans and results of the air quality, noise and traffic figures to the public at engagement events scheduled for later this year, prior to a DCO application*'. Ryan Rawson, Regional Investment Programme (RIP) North Assistant Project Manager

¹³ Planning Act 2008 s 47

High Peak Borough Council and the Peak District National Park Authority all submitted holding objections based on lack of information in the PEIR and the absence of any traffic modelling or transport assessment.

- 22 The degree to which the impacts of the scheme were withheld from the public through the consultation only became apparent through the scrutiny allowed by the EiP. These impacts included (i) increased traffic impacts and congestion causing rat running on residential streets (counter-productive to the adoption of active travel measures), poorer urban environment and increased risk of road crashes, all within Glossopdale; (ii) increased risk of road crashes on both the SRN and the local road network, particularly the A57 Snake Pass; (iii) severe adverse impacts on the Green Belt; (iv) increased traffic on cross-National Park roads. None of these are mentioned in any of the consultation documents. The brochure delivered to everyone's home concealed information that would have a huge impact on people's well-being. The statements on road safety in the FAQ were in total contradiction to the results presented with the DCO application and bordered on the dishonest. The concealment alone is sufficient to make the consultation on the scheme invalid, and to call into question the validity of the claimed support for the scheme, not to mention NH's integrity.
- 23 The statutory consultations are the only means available to the public to gain an informed impression of the scheme and its impacts. PINS regards them as the best time to influence a project whatever one's opinion¹⁴. The next step, the DCO application, is daunting, technical, requires huge amounts of time to read thousands of pages of evidence, and total commitment to keep up with weekly deadlines, answering questions from the Examining Authority (ExA), rebutting evidence and scanning revised versions of NH's original documents. It therefore excludes the majority of the public who do not have the resources or perseverance to engage.
- 24 NH is required to produce a Consultation Report to show how it met its legal duties with respect to consultation and took account of the comments made. The Consultation Report is therefore an important document. Best practice¹⁵ advice is for those making a DCO application to make it available before the application is submitted to PINS. NH refused to do this when we asked¹⁶ and only submitted it with the DCO application. It therefore failed to follow best practice. Seeing the comments made and NH's response to them would have helped the public prepare for the DCO process.

¹⁴ <https://infrastructure.planninginspectorate.gov.uk/application-process/the-process/>

¹⁵ Planning Act 2008: Guidance on the Preapplication Planning Process, 2015, para 81
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418009/150326_Pre-Application_Guidance.pdf

¹⁶ Email from CPRE to NH 17 May 2021 asking if the consultation report will be available before the DCO application is made, as good practice advises. Email from NH to CPRE 25 May 2022 advising that full consultation report will be published when DCO application is submitted

- 25 Once the DCO application is submitted, all the local authorities are invited to submit adequacy of consultation reports to PINS. Although all responded that NH had held the consultation according to the SoCC, Derbyshire County and High Peak Borough Councils (AoC-003) and the Peak District National Park Authority (AoC-004) drew attention to multiple flaws in the consultation; and reported that insufficient information was published with the consultation to enable them and the local community to determine the likely impacts of the scheme. The Councils also reported that they had *'received multiple letters from residents which raised similar concerns'*.
- 26 In summary, both consultations were a travesty of what a consultation should be. Under its licence NH is bound to follow the Cabinet Office guidance on consultation. The current version of this, issued in 2018, encourages those preparing consultations to *'give enough information to ensure that those consulted understand the issues and can give informed responses'*. The Gunning Principles for consultation¹⁷ require *'There is sufficient information to give 'intelligent consideration' - The information contained in a consultation document should not be as inaccurate or incomplete as to mislead potential consultees in their responses.'* The Aarhus Convention guarantees the right of access to environmental information held by or for public authorities, subject to limited conditions.
- 27 We have shown above that the consultation did not follow best practice according to any of these principles or guidance. It was not conducted in an open and transparent way. The limited amount of information available was so selective it was biased to the point of being dishonest, and would likely be prejudicial to a party affected by the decision. No-one could have made an intelligent consideration of, or submitted an informed response about, the scheme's impacts.
- 28 It appears contrary to good practice to have received holding objections from the statutory consultees in response to the 2018 consultation, and not addressed those concerns before holding another statutory consultation. An effective approach would have been to address all the statutory consultees' concerns and to then seek public views before proceeding to a DCO application. Development of a NSIP should be front loaded with a WebTAG compliant transport appraisal and full environmental impact assessment available for public scrutiny before the formal DCO process is entered. This was not done.

¹⁷ <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>
Supreme Court in *R (Moseley) v Haringey London Borough Council* [2014] 1 WLR 3947

(2) Transport Assessment Report (APP-059)

- 29 The failure to supply full information about the transport impacts, the traffic modelling and traffic data continued into the DCO application. A full WebTAG compliant appraisal, essential to understanding the impacts of the scheme, was not presented as part of the DCO application, as required by National Policy Statement National Networks 2014 (NPSNN) 5.207. The Transport Assessment Report (TAR) accompanying the DCO application did not allow full comprehension of the traffic effects of the scheme or provide sufficient evidence to test the impacts of the scheme against legal, policy and guidance requirements.
- 30 The withdrawn but de facto guidance states that *'a TA is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel¹⁸*. Current Government Guidance¹⁹ for planning states *'Transport Assessments are thorough assessments of the transport implications of development'*, and *'care should be taken to establish the full range of studies that will be required of development at the earliest opportunity as it is unlikely that a Transport Assessment or Statement in itself could fulfil the specific role required of a transport element of an Environmental Impact Assessment where this is required'* as in this scheme (our emphasis).
- 31 Despite all this guidance NH reduced the main purpose of the TAR as *'to summarise the development of the Scheme in a single, stand-alone report for general consumption.²⁰* The omissions and flaws detailed in Appendix B show how far the TAR fell short of presenting a report for general consumption, never mind a 'thorough', 'comprehensive and systematic' assessment of the transport implications of the scheme. No details were given of the traffic modelling and the results showed numerous inconsistencies, still unexplained at the end of the EiP. In three and a half pages it named the modelling software and used three figures to show the modelled area and local zone disaggregation. There was no local model validation report, no forecasting report, no options report, no strategic case report, no economic case report, no appraisal summary. The impact of increased traffic within Glossopdale was barely addressed - the increased risk of road crashes on residential roads, severance of pedestrians, the impact of HGVs, longer travel times were not mentioned or addressed. Journey time savings were limited to parts of journeys, not actual journeys the travelling public would make. There was no assessment of the impact on buses.

¹⁸ Guidance on Transport Assessment, DfT & DCLG, 2007, para 1.2

¹⁹ <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>

²⁰ TAR 1.6.3

- 32 We challenged NH on the quality of the TAR when the DCO documents were submitted but did not receive a reply until well into the EiP. It was defensive and dismissive²¹: *'It is not normal practice to submit all the detailed information relating to the traffic and economic analysis and modelling of a scheme due to the complexity and sheer volume of the data that underpins it, which cannot generally be understood and interpreted by interested parties, unless they are specialists in the fields of traffic modelling and economic analysis²².'*
- 33 Notwithstanding that NH knew there would be, and was, at least one transport professional (MTRU) engaged in the EiP, this was obstructive and counter to understanding the scheme's impacts. Others also challenged the quality of the TAR to which NH responded²³: *'The Transport Assessment Report (TAR) (APP-185) was prepared in accordance with industry standard best practice which is based on previous Department of Transport (DfT) guidance on the preparation of transport assessment that was withdrawn several years ago and not subsequently replaced by alternative guidance. Therefore, currently there is no guidance regarding the preparation of transport assessments for transport schemes'*. Due to the poor assessment we and other IPs appealed to the ExA [REP10-017] that NH should produce a Web-TAG compliant transport appraisal that addressed our concerns. The ExA did not respond to our request. NH did respond [AS-011] as a late submission to the penultimate deadline, reasserting arguments previously made.
- 34 In summary, the TAR contained highly selective information designed to promote the scheme and conceal the serious adverse impacts it would impose. NH failed to meet the minimum standard set by Government for TARs as a 'comprehensive and systematic' assessment of the transport implications of development, let alone go the extra mile required by its licence. NH has no excuse for producing such a poor assessment.
- 35 The lack of transparency regarding the information and data about the traffic modelling is most serious. It limits the public's involvement in the EIA process, which is important, not just to ensure compliance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regs'), which seek to ensure a process by which the public is given an opportunity to express their opinion on environmental matters, but also with the Aarhus Convention in respect of public participation. The public can only participate and give a reasonable opinion on environmental matters if sufficient background data on projected environmental effects is provided. It also undermines the process through which the SoS will seek to ensure that he is satisfied that the material

²¹ REP7-025, 9.69.5

²² REP5-021 page 13

²³ REP7-026, 9.70.33

provided by NH is sufficient for him to reach a reasoned conclusion on the significant effects of the proposed development on the environment.

(3) NH response to CPRE PDSY's requests for information

36 On our behalf Keith Buchan of MTRU began asking for background data on the transport appraisal and traffic modelling in March 2021 in order to inform the development of our alternative proposal and to understand scheme effects. His requests received no response. NH claimed not to have received the emails, although MTRU had never experienced such difficulties with NH before. Although we were told that the failure to receive MTRU emails was being investigated, a year later we have not received any details and on occasion NH did receive emails directly from MTRU. From May 2021 CPRE forwarded all emails from MTRU to NH. We have dealt with our experience during the pre-EiP period, through four key documents supplied to us and during the EiP.

i. Pre-examination

37 Listed below are our repeated requests by email for information relating to the full transport appraisal²⁴, only one of which was successful (in bold).

- 8th June 2021 we resubmitted our list of requested documents²⁵, all of which would have been available had a full WebTAG compliant appraisal been undertaken.
- 22nd Jul 2021 we asked if the sifting of options exercise²⁶ had been repeated since the 2015 Transpennine Routes Feasibility Study and for a response to 8th June email.
- **24th Aug 2021 NH confirmed 'that we have not repeated the Early Appraisal Sifting Tool (EAST) since finalising the options in 2015'.**
- 30th July having read the DCO documents we submitted questions and request for information (summarised in footnote below to show they were straightforward²⁷).

²⁴ REP12-034 which is a compilation of the emails between us and NH.

²⁵ Local Model Validation Report; TUBA outputs for vehicle kilometres and carbon (if not in above); Options Report; Strategic Case; Economic Case; Forecasting report, including use of DfT scenario approach; Assessment Summary Table.

²⁶ A57 Link Roads 6.3 Environmental Statement (ES) Chapters 1-4 Introductory Chapters Planning Inspectorate scheme reference: TR010034 Application document reference: TR010034/APP/6.3 para 3.3 Page 97 of 134

²⁷ Local model and forecasting report or data missing, other than the Transport Assessment (TA) and Appendix 2.1; WebTAG compliant appraisal not submitted but implied in TA, please submit it. Flow diagram in the TA and Appendix 2 are not clear as to their exact position on the roads to which they refer. Is there a labelling issue with Market Street in Hollingworth? Questions:

- 1 What models were used in addition to SATURN for the junctions?
- 2 What are the costs for signalling Junction 4 and what were the traffic impacts of doing this without the full scheme?
- 3 Which DIADEM elements were switched on and off?
- 4 How was walking and cycling included?
- 5 How was public transport included?
- 6 What are the forecasts or assumptions for the local modelled area for:
Public transport (today – 2025 – 2040)

- 6th August NH indicated it was dealing with our 30th July request under the terms of the Environmental Information Regulations 2004 with a due date for issuing a response of 20th August.
- 24th August NH, responding to our email 6th Aug, referred us to the transport modelling and forecasting reports submitted with the DCO. As we have shown above in para 32 there were no transport modelling and forecasting reports submitted with the DCO.
- 2nd Sept we repeated our request for information.
- 15th September 2021, MTRU made a formal complaint *'about the failure to supply basic information on a major scheme DCO: the A57 Link Roads. This has two aspects: the failure to supply the information and the way in which specific requests have not been answered or answered in an unsatisfactory manner. This has severely restricted the ability to scrutinise the justification for the scheme... Please engage with me so that my information requests can be met and my requests for clarification answered.'* To date, MTRU's formal complaint has still not been addressed.

38 NH's target to respond to emails is within a maximum of 10 working days. The only email which received a response within 10 working days was the email in which NH invoked the Environmental Information Regulations 2004 – NH failed to meet this deadline too. The blatant delay in responding was uncooperative and negative. Directing us to where information could be found, knowing full well that it was absent, breaks multiple Nolan principles. NH's approach to dealing with our requests for the full transport appraisal was in contrast to general enquiries which were dealt with in a timely fashion, including those relating to the scheme's environmental statement and road collisions which were addressed under Freedom of Information. This gave us the impression that NH had something to hide from scrutiny in the background transport work to the scheme.

39 For eight months NH were uncooperative, unhelpful and withheld information about the full transport appraisal that should have been supplied with the DCO application. Finally in the evening of Friday 12th November - one working day before formal proceedings for the EiP commenced on Tuesday 16th November - four background documents were sent to us; the Combined Modelling and Transport Appraisal Report, the Economic Appraisal Package, the Transport Forecasting Package and the Transport Modelling Package for the A57 Link Roads.

Cycling (today – 2025 – 2040)

Walking (today – 2025 – 2040)

7 Are the time savings in Figure 7.7 to the junctions at each end but not through it? Are there more details of real origin and destination pairs and zone to zone timings?

8 Do you have queue length data for key junctions?

ii) The four background documents – REP2-090

- 40 When NH shared the four technical documents they told us they would not be submitting them to the EiP *‘due to the technical depth of these documents. The Transport Assessment produces the data in layman’s terms and should be used instead²⁸’*. In the interests of openness and transparency we submitted them to the EiP at with our written representation on January 14th 2022, Deadline 2. They were accepted by the ExA and published by PINS as one combined document - REP2-090 (in which two of the documents are repeated). A number of IPs, including CPRE, referred to REP2-090 in their submissions. At first NH ignored references made to it. However, on 23rd February 2022 in response to IP submission REP3-032 drawing attention to REP2-090, NH stated²⁹:
- 41 *‘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’*.
- 42 This statement was not only misleading, it was also incorrect [REP6-032]. The full package of information accompanying the DCO application was accepted by the Planning Inspectorate on 26 July 2021. The four documents were released by NH to CPRE on 12th November 2021, nearly 4 months after the DCO application was accepted, not in advance of its submission.
- 43 Furthermore these documents are 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. The fact that the four documents were accepted by the ExA indicates they must have been considered of use to the EiP; the ExA and IPs were able to read them in the context of all the supporting information for the scheme. We found them crucial for scrutinising evidence. They emphasised the poverty of information in the TAR and how much essential evidence NH had withheld. For example:
- 44 The Transport Forecasting Package revealed that refinements were made to the model during development of the scheme in order to reduce air pollution in Tintwistle and Dinting Vale Air Quality Management Areas (AQMAs), and along Glossop High Street West³⁰. The pollution arising from the scheme would otherwise have been of such

²⁸ Draft Note of meeting between NH and CPRE, para 6, 15 December 2021

²⁹ REP5-021 page 13

³⁰ REP2-090 7.3.1 pdf page 519/790

severity that it was considered that it would jeopardise the application for development consent. These model refinement steps could have led to the anomalies in the traffic outputs described above. They could also have led to differences between 2025 'do minimum' and 'do something' modelled traffic flows through both AQMAs and along the A57 not meeting the criteria for, and therefore being excluded from, assessment of air quality³¹. They could also have led to changes in traffic flows on the A628T with the scheme not meeting the criteria for assessment under the Habitats Regulations Assessment.

- 45 The Transport Forecasting Package also revealed that the traffic model had been applied to reduce traffic flows on the A57 through Glossop and divert them onto residential roads, leading to all the consequences described in para 32 above. It revealed a diversionary route labelled 'Hadfield Alternative'. This information was not available in any of the DCO documents and was a key point of concern to IPs³².

iii) During the EiP

- 46 Once the EiP started and the ExA was taking note of proceedings NH became more responsive. We had two technical meetings with NH during the EiP on 15th December 2021 and 19th January 2022 in order to allow MTRU to ask questions, request information and increase our understanding of the transport assessment. The meetings were led by NH; direct technical dialogue with those undertaking the assessment of the scheme was not allowed. This fundamentally limited our understanding. The bulk of the requested information was supplied by 7th March [REP7-025, 9.69.61]. However the data requested on public transport was never satisfactorily resolved (see Appendix C a. below).
- 47 We initially agreed to aid the EiP and the ExA as to where we did and did not agree with NH through a Statement of Common Ground (SoCG). Due to NH's obfuscation and ignoring our requests for clarification we were unable to complete this.
- 48 In summary, NH was completely resistant to engaging with us and providing information before the EiP started. There was no good reason for withholding any of it, and it could all have been shared at the latest with the DCO application. Once the EiP started, the formal process required at least a show of cooperation but even that was hampered by NH's restrictive management of the dialogue.

³¹ Through the Tintwistle AQMA the predicted vehicle flows were 40 vehicles per day short of the threshold (an increase of 1,000 AADT) required by the guidelines. The shortfall to meet the criteria for the Habitats Regulation Assessment was 150 vehicles per day. The PDNPA in its Local Impact Report REP2-048, 8.3.12 through to its deadline 9 response REP9-035 pp 3-4 submitted a sustained judgement that the European sites adjacent to the A628T must be assessed but was ignored.

³² REP2-089; REP4-027 pp4-5; REP9-051 pp1-3; REP9-049

(4) Examination of the DCO application

49 The topics through which NH tried to conceal crucial evidence are detailed in Appendix C. They ranged from assessment of public transport; assessment and review of appraisal options; explanations of the spurious traffic data, the uncertainty log and associated development; increase in vehicle kms; a sensitivity test for carbon emissions; visibility of the scheme to the public; major nearby development Godley Green Garden Village; and the impacts of national and regional policy on public transport walking and cycling policy on the scheme. The tactics demonstrate a spectrum of behaviour from delay in producing information to the extent it was too late for the EiP to consider, trying to show due process had been followed when it had not, avoidance of answering questions and drip feeding small amounts of information, playing circular games, offering diametrically opposing answers to the same repeated question, and poor understanding of its own evidence. All this wasted EiP time and opportunities for proper scrutiny, gave rise to a lack of confidence in the work undertaken by NH and its contractors, and challenged the integrity of the environmental, social and economic assessment of the impacts of the scheme.

Summary of non-compliance with Licence para 5.19

50 Both statutory consultations misled the public as they were prejudicially biased, withheld information critical to understanding the impacts of the scheme and failed to meet basic standards of consultation. NH, when dealing with our requests for information, failed to engage in an open, transparent, responsive and collaborative way. Instead it was obstructive, only improving its behaviour once under observation from the ExA. The TAR presented with the DCO application was an exceedingly superficial assessment of the scheme from which crucial evidence was withheld. NH's approach throughout the EiP was to reduce adverse impacts to insignificance and to dismiss challenges, rather than engage in constructive dialogue. It was evasive, obstructive and defensive, and frustrated the many attempts to get substantive answers that would aid understanding of the scheme's impacts.

(C) FAILURE TO COMPLY WITH STATUTORY DIRECTIONS IN THE LICENCE

Licence Para 4.1 It must operate and manage the SRN in the public interest in respect of both current activities and needs and in providing effective stewardship of its long-term operation and integrity.

51 The process of addressing the problems along the A57/A628/A616T corridor was deeply flawed. The A57T is but one section of the strategic South Pennines Corridor between the Port of Liverpool and the Humber Ports³³. Instead of addressing the whole route the 2015 Trans-Pennine Routes Feasibility Study focused on the traffic 'hot spot' at Mottram. It excluded another strategic corridor, the M62, the traffic on which interacts

³³ South Pennines Route Strategy 2017 Highways England

with the A628T corridor. The study focused on highway matters, avoided a multimodal approach, and failed to adopt a full corridor approach. It did not therefore follow the WebTAG requirements to start with a blank sheet, consider transport problems in the round and consider all solutions including non-transport ones³⁴. This narrow approach is reflected in the South Pennines Route Strategy in which all the issues on the SRN are solved with highway interventions without due regard to modal shift to rail. The Mayor of Liverpool has expressed his dissatisfaction with this approach in his recent rejection of the A5036 Port of Liverpool dualling at the west end of the corridor³⁵.

- 52 The scheme under examination is what remains of previous, larger scale proposals (the 2007 Mottram-Hollingworth-Tintwistle bypass). The issue of piecemeal implementation disguising real strategic impacts was dealt with as far back as the 1980s and by SACTRA. Yet even now this piecemeal approach continues to east and west of the scheme within this corridor. To the east NH is exploring the feasibility of the Hollingworth-Tintwistle bypass³⁶. It is likely that the current scheme will increase traffic along the A628T through Hollingworth and Tintwistle, fuelling irresistible demands for road building to relieve the villages. The next step would then be the proposed dualling of the corridor to the M1³⁷. Any extension to the east would impact directly on the Peak District National Park and bring the test of major development in a National Park into play. By developing a small length of the corridor the big strategic impacts are avoided and resistance is reduced as each piece passes through its formal process as a standalone scheme.
- 53 In the other direction, five miles to the west along the M67, the M67/M60 J24 Denton Island interchange was excluded from the scheme's assessment. Yet the interchange has long been recognised as a pinch point for congestion³⁸ in need of improvement, and the proposed interventions are part of the Trans-Pennine Upgrade of which this scheme is a part. *'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... It is included in*

³⁴ Transport Analysis Guidance The Transport Appraisal Process, DfT, 2014
<https://webarchive.nationalarchives.gov.uk/ukgwa/20181209040649/https://www.gov.uk/government/publications/webtag-transport-appraisal-process> The more recent version published in May 2018 carries the same information
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938766/tag-transport-appraisal-process.pdf

³⁵ Liverpool City Region Mayor, letter to SoSfT re A5036

³⁶ 2020 statutory consultation FAQ; RIS2 2020-2025

³⁷ Trans-Pennine tunnel study

³⁸ South Pennines Route Strategy 2017 Highways England; South Pennines Route-Based Evidence Strategy Report, Highways England, 2014, Figure 3; South Pennines Route Strategy, Highways England, 2017 p.29

the Highways England Risk Register for the project³⁹. The A57 Link Roads would add, according to NH modelling, an extra 8,000 vehicles every weekday to the M67 in 2025 the opening year⁴⁰. Adding in traffic from the proposed nearby major development Godley Green Garden Village (see Appendix C ix) would lead to the interchange operating at above or approaching capacity⁴¹. National Highways' plans for mitigation measures at the M60 J24 interchange were not mentioned in the DCO application.

- 54 All these failings stem from a failure of those undertaking an appraisal to understand and/or have due regard for the strategic context within which a proposal sits, as identified by the Treasury's Green Book 2020 (see para 92 below). Effective stewardship of the SRN's long term operation and integrity also requires a strategic multimodal approach, which NH has failed to take.
- 55 Increasing carbon emissions in a climate crisis is not effective stewardship in the public interest. In June 2021 the Climate Change Committee stated: *'Decisions on investment in roads should be contingent on analysis justifying how they contribute to the UK's pathway to Net Zero. This analysis should demonstrate that the proposals would not lead to increases in overall emissions⁴².*' In June 2022 it identified that *'Substantial investment in roadbuilding should only proceed if it can be justified how it fits within a broader suite of policies that are compatible with the UK's Net Zero trajectory⁴³.*' The case for the A57 Link Roads was developed many years in advance of DfT's Decarbonising Transport (2021) and the UK's Net Zero Strategy (2021), and did not foresee these key policy documents of the current legal framework, let alone attempt to align with them. The traffic modelling failed to express either document's policy objectives or targets as core assumptions - the current traffic models are based on assumptions which reflect very different scheme specific objectives that date from many years ago.

Licence Para 4.2 Without prejudice to the general duties on the Licence holder under section 5 of the Infrastructure Act 2015, the Licence holder must, in exercising its functions and complying with its legal duties and other obligations, act in a manner which it considers best calculated to:

Para 4.2d. It must ensure efficiency and value for money.

- 56 NH prematurely rejected alternatives (our package of lorry control system and sustainable travel measures; and the proposed Mottram Gyrotory Flow) that both

³⁹ REP12.028 Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 page B34 para 15.3.8; pdf page 110/170 - submitted by CPRE

⁴⁰ A57 Link Roads, ES, Appendix 2.1 Traffic Data, AAWT Opening Year 2025

⁴¹ Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 page B32 Table 9 pdf 108/170

⁴² Table A6 pdf page 20/32 Joint Recommendations Report to Parliament, Climate Change Committee June 2021

⁴³ Page 139, Progress Report to Parliament, Climate Change Committee, June 2022

scored as well or better than the scheme in the 2015 Trans-Pennine Routes Feasibility Study.

57 Our package was rejected as difficult to deliver – updated technology has simplified lorry control systems based on weight restrictions. The MGF, as proposed by an IP Mr Bagshaw, was initially described⁴⁴ as the *'best performing individual option against the sifting criteria and for meeting the objectives for the Scheme'* and as deliverable and feasible. Then, curiously, at this point in the assessment of options⁴⁵ it was decided to assess the MGF not as a standalone scheme, nor in conjunction with other sustainable measures, but in conjunction with a package of measures which included first and foremost a link road between the A57 (T) and the A57 in Glossop.

58 As NH failed to review the options during development of the outline business case for the scheme, the scheme is not proven to provide the most efficient and best value for money. The Economic Case for the scheme has not been made.

59 Compounding this error is the failure to include public transport, walking and cycling in the traffic modelling, which led to a BCR that does not reflect the current policy framework. The Government plans to cut urban traffic by increasing walking and cycling to 50% of all trips by 2030. Greater Manchester plans for no net increase in motor vehicle traffic and to reduce car's share of trips to no more than 50%, with the remaining 50% made by public transport, walking and cycling by 2040. Had the traffic modelling reflected these policy measures it would have shown a reduction in traffic forecasts for the scheme, and therefore a reduction in the value of journey time savings and the value for money. The failure to include public transport walking and cycling is part of NH's failure to engage with the strategic context of the proposal (see para 92).

Licence Para 4.2e. It must protect and improve the safety of the network.

60 The SRN and local road network would become more dangerous for drivers, not safer, with the scheme. The risk of road crashes would increase across the modelled network by 0.3%, the brunt of which would occur on the A628T and the A57 Snake Pass (county A road across the National Park). Despite the increased risk being a direct result of the scheme NH dismissed it as insignificant and offered no mitigation.

61 The increased crashes on the A628T would appear despite, and would negate the effect of, the A628T Safety and Technology improvements, previously part of the scheme but progressed separately as not requiring development consent. The improvements focus

⁴⁴ REP2-005 revised ES Ch 1-4 Introductory Chapters, page 100 Table 3.3 (23 Options assessed at the initial sift)

⁴⁵ Trans-Pennine Routes Feasibility Study, 2015, Appendix 2, the Stage 2 Report of this same study [Annexes – Annex 1], para 5.9

on crash hotspots and the provision of electronic signs⁴⁶ and were included within the baseline 'do minimum' scenario⁴⁷ for the scheme. The increased risk of crashes on the trunk route is due to traffic diverting off the safer motorway network and onto the A628T⁴⁸. In addition, *'the severity of the accidents which are predicted to occur on the new link road may increase due to the increased speed'* (TAR 7.2.12). NH's acceptance of increased crashes on the SRN does not meet the statement in Road Investment Strategy (RIS) 2020-2025: *'enhanced safety remains Highways England's first imperative and informs everything it does from design principles, road standards, operational procedures and investment decisions. We will strengthen this ambition through our investment plan, performance specification and targeted safety improvements through the small schemes fund'*.

- 62 The A57 Snake Pass *'is forecast to experience a modelled predicted increase of more than 160 accidents over the 60-year appraisal period'⁴⁹* with the scheme. NH took the attitude that *'safety features in areas outside the Scheme are not within the Applicant's remit'⁵⁰*. The route is already considered a high risk rural road. To mitigate the scheme's impacts Derbyshire County Council proposed the use of average speed cameras. However, such measures would cause harm to the National Park's statutory purposes and were challenged by the National Park Authority⁵¹. In the face of these difficulties NH proposed to 'update' the model with respect to the incidence of crashes on the Snake Pass at the detailed design stage when there would be no accountability through the EiP. *'It is possible that the appraisal overestimates the forecast increase in accidents on this section of road...'* *'...scheme modelling will be updated as the detailed design evolves'⁵²*. The start of the Snake Pass is 3.2miles east of the scheme. The detailed design of the scheme is not going to alter the incidence of crashes on the Snake Pass unless it includes a massive traffic restraint measure akin to the Mottram crossroads and/or average speed cameras along the Pass. This 'updating' appears most unusual as the modelling of accidents on the Snake was set up to ensure the most accurate relationship between accidents and flow [REP2-090, 4.7.32-4.7.33]. It appeared to us as subterfuge – an attempt to 'magic away' adverse impacts of the scheme and avoid mitigation which could prove difficult and costly to implement.

⁴⁶ The Case for the Scheme 2.1.9

⁴⁷ ES Ch1-4 Introduction 2.4.6-2.4.9; 3.4.5

⁴⁸ APP-185, 7.2.13

⁴⁹ Transport Appraisal 7.2.11-7.2.13

⁵⁰ Consultation Report Appendix Y page 167

⁵¹ REP12-014 SoCG between PDNPA and NH, 2.3.6

⁵² REP9-020 SoCG between Derbyshire County Council and NH, 9.5

Licence Para 4.2f. It must cooperate with other persons or organisations for the purposes of coordinating day-to-day operations and long-term planning;

- 63 This duty stems from section 5(1) of the Infrastructure Act 2015, to cooperate with other persons or organisations in order to:
- (a) Facilitate the movement of traffic and manage its impacts;
 - (b) Take account of local needs, priorities and plans in planning for the operation, maintenance and long-term development of the network (including in the preparation of route strategies);
 - (c) Provide reasonable support to local authorities in their planning and the management of their own networks.
- 64 We have not been privy to any of the meetings between the statutory stakeholders and NH. What follows has been collected from written statements made before and during the EiP. On the evidence before us NH has failed to meet this duty and licence condition.
- 65 As noted in para 22 above two local authorities and the Peak District National Park Authority put in holding objections on the basis of inadequate information. The latter changed this to an outright objection. This reflected not only the adverse impacts on the National Park, but also the lack of information available in the DCO documents.
- 66 HPBC requested an extension to the 2020 statutory consultation area so that all wards within Glossopdale would receive a coloured brochure about the scheme. This was denied.
- 67 NH refused to meet High Peak Borough Council's request to assess air quality through two AQMAs. It remains an area 'not agreed' through the SoCG⁵³ (see para 45 above).
- 68 NH dismissed the need for mitigation measures requested by High Peak Borough and Derbyshire County Councils for traffic impacts and increased risk of road crashes. NH considered all these impacts to be insignificant and not requiring mitigation. Towards the end of the EiP NH agreed to work on some measures, outside the DCO process, thus avoiding public scrutiny.
- 69 It refused to meet the Peak District National Park Authority's request to assess the impacts of the scheme on the European Natura 2000 sites adjacent to the trunk route⁵⁴, on the Tintwistle AQMA and on the Tintwistle Conservation Area.

⁵³ REP12-008 & REP12-025 SoCG between High Peak Borough Council appears in library twice, documents are the same, paras 9.5, 9.18 & 9.20; REP2-046, 19.1 HPBC Local Impact Report; REP9-033

⁵⁴ REP12-014, 2.1.1.2, 2.3.1

70 Although NH's safety responsibilities are limited to the SRN, it is expected to cooperate with government agencies, the devolved administrations, local government, enforcement authorities, a host of other public and private bodies, and road users to improve road safety⁵⁵. Every Local Highway Authority with responsibility for the roads that would see increased crashes with the scheme in place unanimously seek reduction of road crashes and casualties, all of which NH has ignored both in future day-to-day operations and long term planning:

- DCC LTP 3 2011-2026;
- South Yorkshire Mayoral Combined Authority⁵⁶, which aims to improve safety on the network for all users. *'Safety for all road users must remain of paramount importance'*;
- South Yorkshire Local Transport Plan aims to maximise safety⁵⁷;
- Sheffield City Council Transport Strategy (2018)⁵⁸;
- Kirklees MBC 2025 Transport Vision⁵⁹;
- GMCA's *'ambition'* is *'To reduce deaths on our roads as close as possible to zero (by 2040)⁶⁰'*.

71 In the final version of the SoCG between Transport for Greater Manchester (TfGM) and NH, TfGM requested that NH provide a response to how the scheme would contribute to the Government's Transport Decarbonisation Plan and to Greater Manchester's local carbon targets and budgets⁶¹. *'The Climate Emergency declarations that are guiding local policy and therefore 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'*. NH refused this request despite the requirements of NPSNN para 4.4 and the EIA Regulations. However, it *'prepared a table to split the predicted GHG emissions for Greater Manchester and ... has issued this to TfGM.'*

⁵⁵ DfT's The Road Safety Statement 2019 A Lifetime of Road Safety

⁵⁶ Roads Implementation Plan 2020 SY MCA <https://governance.southyorkshire-ca.gov.uk/documents/s3997/Annexes%201%20The%20Roads%20Implementation%20Plan.pdf>

⁵⁷ SY LTP 2011-2026 7.1-7.15

⁵⁸ Transport Strategy 2019-2035 Sheffield CC <https://www.sheffield.gov.uk/home/travel-transport/transport-strategy-plans>

⁵⁹ <https://www.kirklees.gov.uk/beta/planning-policy/pdf/supportingDocuments/transportInfrastructure/2025-Kirklees-Transport-Vision.pdf>

⁶⁰ Transport For Greater Manchester, 2040, revised Jul 2021, <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/supporting-documents/?folder=\09%20Connected%20Places#fList>

⁶¹ REP12-009 TfGM Statement of Common Ground para 10.3, pp 28-29

72 TfGM also asked NH ‘*how the scheme contributes to Greater Manchester’s Right Mix targets and the Greater Manchester’s 2040 policies*’. This is Greater Manchester’s plans for no net increase in motor vehicle traffic and to reduce car’s share of trips to no more than 50%, with the remaining 50% made by public transport, walking and cycling by 2040. NH avoided the request and gave a tangential answer. In fact the traffic modelling in which TfGM had played no part had taken no notice of the Right Mix targets, and hence it could not know what impact the scheme would have. It is still unclear if TfGM understands the impacts of the scheme as it was only engaged in scrutiny of the scheme through the SoCG

73 Despite the scheme creating adverse impacts on the responsibilities of all these authorities, NH refused to take responsibility for addressing them, deeming them insignificant and, if related to traffic impacts, the responsibility of the highway authority.

Para 4.2g. It must minimise the environmental impacts of operating maintaining and improving the network and seek to protect and enhance the quality of the surrounding environment;

74 NH fails to meet this statutory direction as follows.

75 Operational GHG emissions have not been minimised as no traffic restraint measures were applied to the proposal⁶². The scheme would result in 410,000tCO₂ emitted over 60 years.

76 Hollingworth and Tintwistle - NH has failed to minimise the environmental impacts of the SRN as it passes through Hollingworth and Tintwistle. These two villages straddle the A628T, lie immediately east of the scheme and experience traffic congestion with long queues, air pollution from heavy lorries and increased road crashes. Every consultation about the scheme has raised key concerns around these two villages, found the plans did not address their problems⁶³, and showed strong support for measures to relieve traffic through both villages. In the 2018 statutory consultation⁶⁴ Highways England declared it ‘*is unable to resolve*⁶⁵’, that Hollingworth and Tintwistle are not part of the solution. During the 2020 consultation NH refused to engage with questions on Hollingworth and Tintwistle, stating that measures for wider relief are at an early

⁶² NH stated orally that no restraint was applied to the traffic model for the current scheme [EV-25 Issue Specific Hearing 2 Session 2 page 10 3rd line]. However when summarising its position at the Hearing, NH ignored the wider and deeper questions posed by the ExA about restraint of motor vehicles, encouraging active travel, and promoting routes which avoid the National Park. It referred only to restraint applied to HGVs in 2015 Trans-Pennine Routes Feasibility Study when testing options [REP4-008 Item 3d page 15].

⁶³Trans Pennine Upgrade Programme Non statutory Consultation Report Oct 2017 4.10.3

⁶⁴ Trans Pennine Upgrade Report 2018 4.2.1

⁶⁵ Trans Pennine Upgrade Report 2018 4.2.1

concept design stage. Given that traffic along the entire Trans-Pennine route will be affected by the scheme this is a serious oversight. A strategic approach towards long term planning for the whole of the corridor would have avoided this.

77 The surrounding environment that the scheme would harm includes the (a) Peak District National Park, (b) Glossopdale and (c) Greater Manchester.

(a) The first statutory purpose of the National Park is to protect and **enhance** natural beauty wildlife and cultural heritage (our emphasis). The Dark Peak, crossed by both the A628T and the A57 Snake Pass, is famed for its desolate and exposed tracts of moorland that stretch great distances, create a sense of remoteness⁶⁶ and are largely inaccessible to motor traffic. The noise from traffic on all these roads already affects the natural beauty and tranquillity of the Park up to a mile distant on open moorland⁶⁷. The increased traffic generated by the scheme would further harm these nationally important landscapes and impair their tranquillity. NH refused to recognise that the impacts of increased traffic through the Peak District National Park would be significant, as considered by the statutory authority for the National Park, and offered no mitigation. The objection from the PDNPA shows that NH's interpretation of the National Park's statutory purposes and associated policies does not meet the standard required of it by its s.62 duty under the Environment Act 1995.

(b) Within Glossopdale the local environment would be impacted negatively by more congestion, rat running on residential roads, noise, and air pollution. NH dismissed the impacts as insignificant.

(c) The scheme would have a major irreversible negative effect on local landscape and townscape which NH refused to recognise as significant [APP-063, 7.7.8]. The scale and formality of its infrastructure - dual and single carriageways, three concrete underpasses, two bridges, huge new junction, lighting, signage, embankments cuttings and false cuttings, drainage features, fencing, access tracks, new plantings - and its associated traffic would encroach on and fragment open countryside reducing its permeability for wildlife; destroy the individual character of the pastoral landscapes; and harm the setting of the historic village of Mottram and the openness of the Green Belt. The huge new junction where the scheme crosses the A57T is out of scale with the surrounding townscapes. The scheme consumes open land, a finite irreplaceable asset in the UK. It is both natural capital and strategic open space, which supports multiple

⁶⁶ Dark Peak, Landscape Strategy, PDNPA, 2009

⁶⁷ Peak District National Park, State of the Park Report 2000, p 40 - Until recently the National Park was a complete tranquil area apart from Bakewell and Tideswell. By the late 1990s three roads with an excess of 10,000 vehicles per day within the Park, including the A628, reduced the tranquil area by 50%.

ecosystem services critical to urban areas which have higher vulnerability to climate change due to their lack of habitats.

Licence Para 4.2h. It must conform to the principles of sustainable development.

78 The licence spells out sustainable development as *'encouraging economic growth while protecting the environment and improving safety and quality of life for current and future generations.'* All of the above impacts described in paras 51-77 indicate that the scheme fails to conform to the principles of sustainable development.

Licence Para 5.29 It must comply with or have due regard to Government policy.

79 The NPSNN 2014 is the framework for decision making but recognises that relevant national, regional and local policies are in play. In particular a series of provisions of the Planning Act section 104 are incorporated in the NPS, and some of its requirements are specifically stated in terms of other laws and regulations such as the EIA Regs 2017. When dismissing challenges made by us or other parties using other policies, NH quoted NPSNN as the sole framework of relevance to decision-making. The scheme fails to meet a number of NPSNN policies as follows.

80 NPSNN 4.3 requires that for a proposed development the ExA and SoS should take into account its potential benefits, and its potential adverse impacts. The transport assessment and modelling are fundamental to the environmental assessment. With so many omissions and unexplained spurious results within them, it is not credible to even attempt to reach a reasoned conclusion on the significant effects of the proposed development.

81 NPSNN 4.4 requires environmental, safety, social and economic benefits and adverse impacts, to be considered at national, regional and local levels. There was no local or regional assessment of the scheme's carbon emissions despite two sets of available data (BEIS UK carbon emissions national stats and local authority SCATTER budgets from the Tyndall Centre), and a third set of self-scaling data – a local/regional proxy – provided by the study area and traffic model itself (when corrected and fully transparent) [REP9-039]. Local adverse impacts of all kinds – social environmental and economic – were concealed from the public and stakeholders at consultation stage and underplayed during the EiP (see paras 23, 32; Appendix A b-g; Appendix B b-g; Appendix C c, f, i, j).

82 NPSNN 4.6 – projects should usually be supported by a local transport model to provide sufficiently accurate detail of the impacts of a project. The impacts on Glossopdale were withheld from the public as detailed above (see para 23 above) and then from the EiP. When pressure on the issue increased throughout the course of the EiP NH stated that the work had been done, and yet still refused to share their findings with the Examination [REP8-018, Q3.6]. NH's detailed analysis of the traffic on one select link

[REP9-029], Dinting Road, appeared to validate IPs' requests for further analysis of all of Glossopdale but none was forthcoming [REP12-022, 9.87.8].

- 83 NPSNN 4.15-4.17 invokes Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which sets out the information that should be included in the environmental statement. The assessment of GHG emissions does not conform to these requirements [REP8-029, 7.5]. First, it does not provide an accurate quantification of the scheme in isolation; second, it does not provide a proper quantification of the cumulative carbon emissions; therefore, the application is not compliant with the EIA Regulations [REP8-029]. NH's claim that the traffic model is 'inherently cumulative, or is 'compliant with DMRB', does not make the environmental statement compliant with the EIA Regulations on cumulative carbon emissions assessment.
- 84 NPSNN 4.26-4.27 lists the legal and policy requirements for consideration of alternatives, which are not exhaustive. As we have shown above the 2015 options appraisal was flawed and has not been reviewed. Therefore the scheme's status within the RIS, the 2004 Tameside Metropolitan Borough Council Unitary Development Plan 2004 and the Greater Manchester Transport Strategy 2040 is questionable.
- 85 NPSNN 2, 2.24, 3.2 and 4.64-4.66 address road safety. The increased risk of road crashes on the A628T corridor and on local roads means NH has failed to meet the requirements of NPSNN which quotes the Strategic Framework for Road Safety 2011⁶⁸.
- 86 NPSNN 5.11-5.12 Air quality considerations are particularly relevant where schemes are proposed within or adjacent to AQMA or nature conservation sites (including Natura 2000 sites and SSSIs), and where changes are sufficient to bring about the need for a new AQMA or change the size of an existing AQMA; or bring about changes to exceedances of the Limit Values, or where they may have the potential to impact on nature conservation sites. NH adjusted the modelling in a way which removed potential exceedances of limit values for nitrous dioxide within 2 local AQMAs (one on the A57 Dinting Vale through Glossop and one on the A628T through Tintwistle), on A57 High Street West through Glossop and on the Natura 2000 sites adjacent to the A628T. NH refused to assess air quality at any of these locations including the two AQMAs. Hence these NPSNN considerations have been ignored.
- 87 NPSNN 5.150 Great weight should be given to conserving landscape and scenic beauty in nationally designated areas. Despite the scheme causing traffic increases on cross-Park roads, NH refused to recognise this requirement, arguing incorrectly that the policy only applies to development that lies within the National Park.

⁶⁸ <https://www.gov.uk/government/publications/strategic-framework-for-road-safety>

- 88 NPSNN 5.152 requires NH when planning the SRN to avoid National Parks, in this case the Peak District National Park. This it failed to do. The 2015 Trans-Pennine Routes Feasibility Study focused only on the corridor through the National Park. In addition, the scheme would cause traffic to divert off the M62 outside the National Park onto the A628T within the National Park.
- 89 NPSNN 5.202 *Development of national networks can have a variety of impacts on the surrounding transport infrastructure including connecting transport networks... The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development.* NH dismissed the scheme's impacts on the local road network as insignificant and refused to consider mitigation. They also refused to share with the Examination the work they had done which justified their conclusion that the effects were 'insignificant'.
- 90 NPSNN 5.207 requires the WebTAG methodology to be followed. We showed above (paras 30-36 and Appendix B) how the TAR failed to meet the requirements of a WebTAG compliant appraisal.
- 91 Other policies with which NH failed to comply, or to which it failed to have due regard, include:
- (a) The Treasury's *Green Book 2020* identified the common failure of those writing appraisals to engage properly with the strategic context in which their proposal sits. Specifically, business cases frequently do not demonstrate the necessary understanding of:
- the proposal's specific contribution to the delivery of the government's intended strategic goals (such as levelling up or net zero); and
 - the specific social and economic features of different places and how the intervention may affect them;
 - other strategies, programmes or projects with which the intervention may interact, including in a particular geographical area.
- This results in significant flaws in appraisals and business cases. All of the above bulleted shortfalls apply to the A57 Link Roads, were initiated in the 2015 Trans-Pennine Routes Feasibility Study from which the scheme derives⁶⁹, and have led to the noncompliance described in paras 52-60 and 78-91 above, and here in para 92.

⁶⁹ Trans-Pennine Feasibility Study, Highways England & DfT, 2015

<https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports>

- (b) The UK Net Zero Strategy 2021 - NH made no assessment of significance of the scheme's carbon emissions against the annual carbon reduction targets and trajectories for transport in the Net Zero Strategy [REP9-039, 10].
- (c) The Government's Decarbonising Transport, A better greener Britain; Bus Back Better – National Bus Strategy for England; and Gear Change – A bold vision for cycling and walking. By omitting walking, cycling and public transport (except rail users with access to a car) from its transport assessment NH has failed to comply with all of these.
- (d) *National Planning Policy Framework 2021, para 175*. NH refused to recognise that great weight should be applied to protection of the National Park and its setting. The objection from the PDNPA shows that NH's interpretation of the National Park's statutory purposes and associated policies does not meet the standard required of its s.62 duty under the Environment Act 1995.

Summary of noncompliance with statutory directions in Licence

92 Through development of the A57 Link Roads NH is failing to meet the public interest and provide effective stewardship of the long term operation and integrity of the SRN. The value for money of the scheme has not been ensured as the options' appraisal was flawed and has not been reviewed. The scheme would be detrimental to the safety of the network, not protect or improve it. NH has failed to co-operate with the local authorities and the National Park Authority over a number of issues. It has also failed to minimise environmental impacts – carbon emissions would increase; traffic would impact adversely on two adjacent villages, on Glossopdale, on the Peak District National Park; the proposed infrastructure is out of proportion to and would disfigure local landscape and townscape. Consequently the scheme does not conform to the principles of sustainability. This is reflected in NH's non-compliance with Government policy in NPSNN, the Treasury's Green Book, UK Net Zero Strategy, Decarbonising Transport, Bus Back Better, Gear Change and NPPF.

(D) FAILURE TO HAVE REGARD TO GUIDANCE IN THE LICENCE

Licence Para 5.15 It should seek to ensure protecting and improving safety is embedded into its business decision making, and to achieve the best possible safety outcomes.

93 The 2015 Trans-Pennine Routes Feasibility Study included a safety objective, against which the scheme scored +1 (beneficial impact). For the 2020 statutory consultation and for the DCO application the safety objective was omitted, despite high accident rates and accident clusters along the route, as safety measures were progressed separately from the scheme (the A628T Safety and Technology improvements). However, as these

measures were included in the baseline traffic modelling and road crashes increased, the mitigation appears to fail. Thus the evidence suggests safety was not embedded in the decision-making for this scheme, which would now score negatively (adverse impact) against such an objective.

Licence Para 5.23 It should ensure protecting and enhancing the environment is embedded into its business decision making.

- 94 NH did not avoid the Peak District National Park when planning the SRN as required by NPSNN 5.152.
- 95 There was no scheme objective to address GHG emissions or climate change despite the 2008 Climate Change Act and the UK's legally binding carbon budgets.

Summary of noncompliance with guidance in the Licence

- 96 Although these licence conditions are considered guidance, rather than statutory directions, they are extremely important. They are both concerned with business decision making which starts with options' appraisal, followed by scrutiny by DfT. Unless the initial appraisal is robust and scrutiny is rigorous the result will be a poor choice. The A57 Link Roads have been developed as a standalone scheme in order to build demand for the next section of new road. For fifty years NH and its predecessor organisations have been trying to force road building to link Manchester and Sheffield rather than address the transport issues within their strategic context. The Peak District National Park designation, through which the A628T corridor passes, does not permit major development unless there are exceptional circumstances and it is in the public interest. Most recently the climate and nature emergencies, and the experience of the Covid pandemic, also challenge the business-as-usual model of building roads to meet future traffic demand. The 50 year history of failed road solutions should be indication enough that what is required here is a fundamental rethink. The National Park designation and more recent events demand it. That is the context within which these licence conditions should be considered.

(E) CONCLUSION

- 97 We have documented above a catalogue of NH's non-compliance with the statutory directions and guidance laid down by the SoS in its licence. NH has evidently failed to meet baseline requirements, never mind meet higher expectations. The whole sorry story casts strong doubts on the credibility of NH and its evidence for the A57 Link Roads DCO application.
- 98 NH withheld crucial information, gave inconsistent, inaccurate or misleading statements and answers through the statutory consultations and the EiP. It repeatedly tried to

wriggle out of accountability for the scheme with obfuscation and delay. This is contrary to behaviour expected of a public agency to be as open as possible about all its decisions and actions, and to restrict information only when the wider public interest clearly demands.

99 The development of the scheme, from the 2015 feasibility study out of which it emerged to the DCO application, demonstrated all that the Treasury Green Book identified about the failure of project sponsors to engage properly with the strategic context in which their proposal sits. With respect to the A57 Link Roads NH failed to address (a) the proposal's specific contribution to the delivery of the Government's intended strategic goals in 2015 (such as climate change) and in 2021 (such as levelling up and net zero); (b) the specific social, environmental and economic features of Greater Manchester, Glossopdale, Longdendale and the Peak District National Park and how the intervention would affect them all; and (c) a raft of other strategies, programmes and projects with which the scheme would interact from the national to the more local. These ranged from addressing climate change and road safety - both key policy areas identified by the ORR for RIS3⁷⁰ - to Greater Manchester's transport decarbonisation programme through its Right Mix policy, and the PDNPA's goals to reduce traffic within, and through, the National Park.

100 The consequences of both NH's behaviour towards engagement with stakeholders and the public, and its failure as the steward of the long term sustainable future and integrity of the strategic road network, led to multiple areas of non-compliance with its licence conditions. These were demonstrated through the statutory consultations which failed to follow best practice; the transport assessment accompanying the DCO application which failed to meet the standard expected of a WebTAG compliant appraisal; the failure of the proposed scheme to conform with the principles of sustainable development; and finally through the EiP, the effectiveness and efficiency of which was compromised by NH's omissions and obfuscations. At the end of the EiP the ExA was still asking fundamental questions about NH's evidence, and new evidence that conflicted with NH's evidence was presented and left unscrutinised. The result is that neither the ExA nor the SoS have the information needed to weigh up the planning balance. The overall effect is to limit democratic involvement and accountability.

101 The ORR has recently identified that where projects fail to be delivered on time, most of the delays occurred during the development phase – before construction begins. Statutory planning processes were one of the four most prevalent risk factors. In our experience it is not the statutory planning processes, red tape or regulations which

⁷⁰ Road Investment Strategy 3 Our role and approach, May 2022, ORR, 3.4a and 3.4b
<https://www.orr.gov.uk/search-news/gearing-third-road-investment-strategy-ris3> ;
<https://www.orr.gov.uk/sites/default/files/2022-05/Road-Investment-Strategy-3-our-role-and-approach-2022-05-04.pdf>

have hindered the effectiveness of the A57 Link Roads DCO application and its EiP but NH's approach and behaviour towards consultation and the planning system. Any subsequent delay to delivery of the scheme - the scheme is at risk of missing its start of work commitment⁷¹ - can be laid wholly at NH's door, through its behaviour, its attempts to conceal the real effects of the scheme, its failure to engage robustly in discussions, its failure to have due regard to its legal duties and Government policy, its failure to plan within the appropriate strategic context.

102 These shortfalls in performance do not appear to be picked up when monitoring NH's performance. Although the key performance indicators (KPIs) test how well NH manages traffic on the SRN and how quickly it delivers its enhancement projects, they do not robustly test NH's role as the steward of the SRN's long-term future and integrity, fit to meet all the challenges of this century in a sustainable way⁷². For example, in the 2021-2022 assessment of performance, the focus is on individual project delivery with no mention of the strategic context of wider Government policy⁷³. Consequently, there does not appear to be a robust framework for monitoring all of the licence conditions.

103 Some of the non-compliance we have documented e.g. taking a piecemeal approach to addressing issues along a corridor instead of strategic long term planning, raise fundamental issues not only about the preparation of the RIS by DfT and of route strategies by NH, but also about the testing by DfT of potential projects as they pass through their development stages. The final stages for an NSIP - the statutory consultation and the DCO application - are deeply flawed. To have received holding objections from the statutory consultees in response to the 2018 consultation on the scheme, and to have not addressed those concerns before holding another statutory consultation smacks of both incompetence and disregard for standards of best practice. An effective approach would have been to address all the statutory consultees' concerns and to then seek public views before proceeding to a DCO application. Development of a NSIP should be front loaded with a WebTAG compliant transport appraisal and full environmental impact assessment available for public scrutiny before the formal DCO process is entered. The EiP would then be able to proceed as it appears to have been envisaged – to iron out technical issues with planning agreements. In view of what we have experienced we believe a review of all these processes is required and that monitoring of them should be more robust.

104 Two key areas are highlighted by the evidence we have presented - environmental issues and engagement with stakeholders, organisations and the public. Environmental impacts and objections on environmental grounds are a key risk to the achievement of

⁷¹ Annual Assessment of NH's Performance 2021-2022, ORR, July 2022, Table B11

⁷² Annual Assessment of NH's Performance 2021-2022, ORR, July 2022

⁷³ Annual Assessment of NH's Performance 2021-2022, ORR, July 2022

planning consents for road schemes⁷⁴ yet environmental issues are not addressed through the RIS and only at a late stage of the NSIP process when the DCO application is submitted. This means adverse impacts are only picked up very late through a process which is not geared to addressing fundamental issues, only to tinkering around the edges. The entire programme being considered for RIS3 (whether carried over from RIS2, or new schemes) must be assessed within a Strategic Environmental Assessment as required by the Infrastructure Act 2015 and the Strategic Environmental Assessment Directive. Schemes should not enter the RIS unless they have been subject to a full and proper appraisal. Once chosen the options appraisal should be regularly reviewed to ensure the scheme remains the best performing, sustainable and cost effective option. The full environmental assessment and the transport appraisal on which it is based should be the subject of scrutiny through the statutory consultation, as we have noted above.

105 With respect to engagement there is no KPI. A review two years ago⁷⁵ of NH's engagement and cooperation with regional and local partners, but not the public or communities, concluded that *'Highways England is complying with the prescribed elements of its licence engagement duties but there is scope for further development of its duties to support regional and local stakeholders and manage their expectations'*. It specifically drew NH's attention to *'recognition of the obligations and priorities of local stakeholders, for example in areas such as decarbonisation and air quality'*. Through the A57 Link Roads, NH's response to stakeholders concerns was the reverse of the ORR's advice – it denied their significance and/or their legitimacy to be considered, of which the most extreme examples were to take no account of Greater Manchester's well developed approach to decarbonisation through radical changes in travel behaviour, or of the views of the statutory authority for the National Park, the PDNPA. Our experience also showed how poorly NH has failed to engage with communities and the public. Engagement must be formally addressed and monitored, as engagement worthy of a public body applies to all elements of the licence. The ORR has promised to review assessment of engagement as part of NH's RIS2 and RIS3 plans⁷⁶ but this should be extended to cover community and the public's engagement in project development.

106 NH receives huge sums from the public purse - in financial year 2020-2021, it spent £160,527,000 on staff and £3,198,000 on consultancy fees⁷⁷ - and is responsible for spending the £24billion committed to the 2020-2025 roads' programme. For that the public would expect NH's performance to at least meet the requirements of the licence, if not the extra mile, and for robust monitoring of that performance.

⁷⁴ Road Investment Strategy 3 Our role and approach, May 2022, ORR, para 3.50

⁷⁵ Review of Highways England's engagement approach with regional and local partners, June 2020,

⁷⁶ Road Investment Strategy 3 Our role and approach, May 2022, ORR, 3.71c

⁷⁷ Highways England Annual Accounts and Reports 2021

107 With respect to the A57 Link Roads we therefore urge the ORR to assess NH's performance in the light of this representation to you and report its findings to the SoS before he makes a decision on the scheme in mid-November 2022. More generally we urge the ORR to enforce behaviour that is expected of a public body and to review the overall monitoring of NH's licence. In particular, we suggest that the ORR a) reviews development of DfT's RIS and NH's route strategies to ensure that schemes that arise from them meet all the criteria for sustainable development, especially with regard to the climate and nature crises; b) insists on, or provides, much more robust assessment and monitoring of scheme development from options appraisal through to project business case; and c) reviews or instigates a review of the complete NSIP process.

APPENDIX A

OMISSIONS AND MISREPRESENTATIONS IN 2020 STATUTORY CONSULTATION

- a. There was no transport assessment, traffic data or traffic modelling results; this despite the SoCC p5 promise of *'more information about key environmental impacts including air quality, noise and traffic.'* Later when presenting draft traffic information to the local authority steering group NH⁷⁸ *'confirmed this was the data presented within the Preliminary Environmental Information Report (PEIR)'*. No traffic data was presented in the PEIR or available to the public until the DCO application was submitted.
- b. There was no mention in any of the documents of the impacts of increased traffic, all generated by the scheme, on Glossopdale. This would lead to rat running on residential streets to avoid congestion on the A57 through Glossop. People were unaware that, with the scheme, the walk or cycle to school, work or the shops would become more intimidating, dangerous and unpleasant; congestion would increase journey times for drivers within Glossopdale; road crashes would increase. The FAQ gave the opposite impression. *'Will the scheme create traffic in other areas? What about Glossop?'* was answered as *'Our traffic assessment shows that overall, the scheme draws traffic on to the strategic road network and off local roads. Therefore we wouldn't expect to see a significant increase in traffic through Glossop during peak times.'* This misrepresentation was only revealed through the EiP.
- c. The infrastructure for the scheme lies within the National Park setting and ~2km from its boundary. There was no mention of the increased traffic on trans-Pennine routes through the National Park or its impacts on tranquillity, wildlife and road crashes, again all only revealed through the EiP.
- d. The whole scheme lies within and crosses the Green Belt yet the word Green Belt appeared only once in - PEIR Vol 3 with respect to the Planning Act 2008. There was no mention of the strict policies surrounding Green Belt, no map of the Green Belt, no mention of the scheme's profound impacts on four of the five functions of the Green Belt and its harm to openness, as revealed by the EiP. Of all planning policies, Green Belt is the best known, best loved and best understood by the general public but it was completely excluded from all the consultation documents.

⁷⁸ APP-026 Consultation Report [Table 3-2] accompanying the DCO application, published July 2021

- e. Safety was only addressed in the FAQ where a misleading impression was given. Improving safety for road users was described as a key objective of the A57 Link Roads, but there was no such objective. Safety benefits improvements were implied: *'Our traffic assessment shows the scheme reducing accidents across the local area, because traffic will be moved onto more modern roads.'* There was no mention of the increased risk of road crashes in Glossopdale and on trans-Pennine routes which came to light in the DCO application.
- f. The economic justification for spending £225m (later reduced to £180m) on the scheme was not made. The statement in the brochure that congestion *'restricts potential economic growth, as the delivery of goods to businesses is often delayed and the route is not ideal for commuters, which limits employment opportunities'* was not informed by evidence.
- g. The colour brochure showed prejudicial bias. It focused to the exclusion of all else on the immediate benefits to residents in Mottram and on Woolley Lane and on the engineering and design changes made since the 2018 consultation. There was no mention of Glossop as a township that might be affected by the scheme – the word Glossop appeared only twice in the brochure to explain that the *'Glossop bound'* traffic would be separated. There was not a single mention of GHG/carbon emissions despite the all-pervasive climate emergency and the fact the scheme would increase these emissions. There was no mention of road safety or of the adverse impacts on the Green Belt. With more pressing issues such as the Covid pandemic on people's minds, the brochure is likely to have been the only document the majority would have read. Its systematic distortion and concealment of the scheme's effects misinformed people as to the effects on their well-being and quality of life.

APPENDIX B

OMISSIONS AND FLAWS IN TRANSPORT ASSESSMENT REPORT

a. Traffic modelling – No details appeared in the TAR. In three and a half pages it named the modelling software and used three figures to show the modelled area and local zone disaggregation. There was no local model validation report, no forecasting report, no options report, no strategic case report, no economic case report, no appraisal summary table.

(i) Assumptions and factors which were built into the model and the values ascribed to these factors were not available to stakeholders or to the ExA.

(ii) No information was available as to how public transport, walking and cycling were dealt with in the model. Late in the EiP NH revealed that only rail trips for households with a car were included. NH continued to confuse the definitions between rail, public transport as a whole, trips which were included or not included in the model and in fact how the limited rail modelling was undertaken [REP9-040, Q3.4, page 5].

(iii) The source of errors in terms of model parameters and specification were concealed from the EiP. NH stated⁷⁹ they were captured in the high and low growth sensitivity tests but provided no details.

(iv) The impacts of the scheme on transport networks in Greater Manchester, despite the majority of journeys being within it, were not presented. Later NH revealed that the scheme was treated as an isolated bypass with limited access to Greater Manchester, with a fixed cost function and masking applied to Greater Manchester within the model.

(v) Data from various sources was used to calibrate the model but how it was applied was not fully explained or given in sufficient detail. Conflicting statements were made about updating the model⁸⁰.

(vi) Inconsistencies in the outputs from the model remained unexplained at the end of the EiP on a number of routes through and within Glossop, Hadfield and Padfield, and along the A628T⁸¹. NH dismissed IPs' attempts to understand these as mistaken⁸² but failed to supply

⁷⁹ REP11-010, 3.3. NH response to ExA's Third Written Questions

⁸⁰ APP Data was collected during 2020-2021 according to the Case for the Scheme 4.3.5 and 4.3.6 for model development. NH refuted this and said only 'historic' data was used REP9-027/9.79.111

⁸¹ REP8-034, 9.69.16; REP9-043; REP10-012, pp 2-3

⁸² REP9-043 Response to PD-014 - Report on Implications for European Sites

a valid explanation for the majority of these or to provide specific data to validate its arguments.

(vii) The EIA Regs Schedule 4 para require *'a description of the relevant aspect of the current state of the environment (baseline scenario)'*. This is essential to understanding the current traffic situation and how it would change with the scheme. With the impact of Covid 19, the most recent actual traffic flows would be 2019. Instead NH used traffic surveys from 2015-2016 and modelled them to create the 'do minimum' scenario in 2025 against which to test the impacts of the scheme. This is not a 'current baseline' and led to a number of discrepancies when comparing the 2025 'do minimum' with existing counts from the DfT traffic website – some flows were much greater, others much lower.

All the above led to enormous problems with understanding the outputs from the traffic model.

b. Road crashes – The TAR, like the consultation documents, maintained there would be *'reduced safety risks within the built up area...'* (TAR Executive Summary). The built up area includes Glossopdale where High Peak Borough Council's Local Impact Report [REP2-046] showed an increased risk of road crashes on residential roads in Glossop. NH excluded from assessment residential roads on *'which the scheme is not expected to have an impact'⁸³*, roads which we now know through the EiP process, and which NH knew when it submitted the DCO documents, would have more traffic as a result of the scheme and therefore more crashes. The evidence presented in the TAR is the shockingly poor Figure 7.8 of the spatial distribution of safety impacts (the scheme incurs a safety disbenefit of -£7.32m over 60 yrs) which is too crude to decipher in the built up areas.

c. Severance – the word does not appear in the TAR. In Environmental Statement (ES) Ch12 NH's concern is wholly with severance of land holdings and reducing community severance on the bypassed A57T⁸⁴. Nowhere is NH concerned with the severance experienced by those attempting to cross the A628T in Hollingworth or Tintwistle (despite the *'high number of pedestrian accidents'⁸⁵*), the A57 through Glossop or residential roads in Glossopdale where traffic generated by NH's scheme would increase.

d. HGVs –The high percentage of HGVs along the trunk route subjects people, communities and the fabric of buildings adjacent to the road to severe impacts. The TAR barely addresses the issues⁸⁶. The scheme removes HGVs from part of the A57T but not from the A628T through Hollingworth and Tintwistle or from the A57 through Glossop. Yet the TAR does not

⁸³ TAR Figure 3.8 The Case for the Scheme 4.5.2;

⁸⁴ ES Ch. 12. 12.9.84

⁸⁵ Trans-Pennine Routes Feasibility Study 2015, Stage 1 Report 1.2.11

⁸⁶ TAR 1.1.2, 3.7.14 HGV percentages and numbers are given in Table 3.8 and Figures 3.6, 4.8, 7.1, 7.2, 7.5 and 7.6.

address their potential diversion to avoid congestion along these routes, or the severance, the intimidation, the risk of road crashes, the disincentive to walk or cycle on these routes that HGVs impose. NH's only concern is for the small length of the trunk road that would be bypassed. This is in direct contradiction to NPSNN's insistence at para 5.202 that impacts on local road networks must be taken into account.

e. Journey time savings – The TAR spells out the importance of journey time reliability (para 1.1.1), which features in the scheme's objective for connectivity (para 1.2.1), and provides monetised benefits worth £11m (para 7.2.6). Despite their significance, journey time savings were presented only as partial parts of journeys, not actual journeys the travelling public would make. Journey time savings on the SRN between Manchester and Sheffield were given for a 10-mile stretch of a 40-mile journey between the city centres and avoided the congestion that would be met within both urban areas. NH's main argument was to claim¹³ that journey times are captured in the modelled road network, which is no substitute for presenting specific evidence. The reason for NH's resistance became clear when it revealed Sheffield to Manchester journey time savings as ~5 minutes [REP5-022, 9.54.64]. This answer meant that claimed city-to-city journey time savings would be significantly reduced - for the 10-mile stretch eastbound savings were predicted as 8-10mins and westbound as 5-6mins – which would substantially reduce the value for money of the scheme and hence the Benefit Cost Ratio.

f. Public transport – There was no assessment of the potential for car journeys to switch mode to public transport, or of the time delay that would be experienced by bus passengers on routes which would see increased traffic. In TAR 3.4.11 NH claimed bus services '*will benefit from improved journey times and reduced congestion*'. This was revealed as a misleading assertion without evidence; in response to the ExA's questions⁸⁷ NH admitted it had not assessed bus times. Bus journey times should have been supplied in the TAR. When they were finally supplied [REP6-017 Appendix A] some improved and some took longer with the scheme.

g. Impacts on Glossopdale – we have detailed these above. The TAR referred only to journey times from Glossop (para 7.1.16) and to '*small increases in accidents through Glossop*' (para 7.2.13), by implication on the A57. Repeated requests for a proper assessment using a local model were refused, despite the requirements of NPSNN 4.2.

⁸⁷ REP7-020 Response to ExA's Written Questions, question 3.14, pp 28-29

APPENDIX C

WITHOLDING OF CRUCIAL EVIDENCE DURING EXAMINATION OF DCO APPLICATION

a. Assessment of public transport

This was important in view of the strong policies in Greater Manchester for radical reduction of car trips and increased travel by public transport, walking and cycling. In order to understand how NH had assessed travel by all modes it was necessary to know how the traffic model dealt with this. This was not disclosed by NH until 5th April Issue Specific Hearing (ISH) despite constant reference to public transport in our emails, at technical meetings, and through requests for clarification. When we first asked NH in July 2021 how public transport was included in the model, we were referred to the transport modelling and forecasting reports submitted with the DCO. As stated above (Appendix B a.) there were no transport modelling or forecasting reports submitted with the DCO, only the TAR which told the reader nothing about how public transport was assessed. Furthermore neither the Transport Modelling nor Transport Forecasting Packages⁸⁸ supplied to us in November 2021 contained that information. Despite two meetings with NH, we were still asking for clarification in March 2022. To aid progress MTRU asked NH to confirm our understanding with a suggested statement for us to agree with NH within a SoCG: *“The model contains public transport trips by people who have a car available but not by other users. In addition, only trips with either an origin or destination in the Area of Detailed Modelling are actively modelled. All other public transport trips are fixed.”* We received no reply and were only answered orally during the ISH on 5th April and by writing [REP8-018 page 55]. However, even that answer contained obfuscation as there were apparently two traffic models for the scheme – a regional mode choice transport model to forecast mode shift and a traffic model.

b. Review of appraisal options

(i) In order to establish if the scheme continued to be the best option since it was chosen in 2015, it was important to establish if a strategic level re-assessment of options had been undertaken since the original sifting of options in 2015⁸⁹. The Treasury’s Green Book 2020 advises that options should be checked at each stage of the Business Case process, updating of the appraisal options is expected for all schemes in the RIS⁹⁰, and since 2015 addressing the climate and nature crises has become urgent. Another strong reason for review was the lack of a suitable traffic model for the 2015 Study. As a result the Study noted (Stage 3

⁸⁸ REP2-090 – Transport Modelling Package pdf pp 98/790; Transport Forecasting Package pdf page 256/270;

⁸⁹ A57 Link Roads 6.3 ES Chapters 1-4 Introductory Chapters Planning Inspectorate scheme reference: TR010034 Application document reference: TR010034/APP/6.3 para 3.3 Page 97 of 134

⁹⁰ RIS1 2015-2020 para 2.12; Treasury Green Book November 2020

Report 4.2.17) there is *'a risk that forecasts developed using a new traffic model may differ from those produced as part of this assessment.'*

(ii) NH's answers when questioned on this matter were changeable. It first confirmed in August 2021 *'that we have not repeated the Early Appraisal Sifting Tool (EAST) since finalising the options in 2015'*. It then used timing as an excuse not to undertake the review - *'The updated Green Book postdates consideration of alternatives to the Scheme and selection of the preferred option'⁹¹* - ignoring the fact that the need for review continues after selection of the preferred option. When questioned by the ExA, NH then claimed it had undertaken a review, using changes to design or exclusion of certain elements⁹² which is not what a strategic review of the options appraisal is about. When challenged on that argument it reverted to its original position of not having undertaken a review because *'it would not be practicable'⁹³*. We therefore concluded that NH had not undertaken a review as required by RIS and the Treasury Green Book. Trying to show it had undertaken the required review when it had not emphasised how poorly NH has followed procedure and how it sought to conceal this from the EiP.

c. Explaining the spurious traffic data

(i) The outputs of the traffic model, i.e. the predicted traffic flows and their distribution, nature and composition, were fundamental to all the evidence about the scheme's effects on the transport networks, on road safety and on the environment, society and the economy. Clarity is required on both the model's limitations and its outputs. Our lack of confidence in the modelling and its results increased throughout the EiP, was shared by other interested parties (IPs), and was comprehensively expressed through a joint letter to the ExA [REP10-017]. It was also shared by the Peak District National Park Authority⁹⁴ and by High Peak Borough Council⁹⁵.

(ii) Initially NH relied on blanket statements that it had absolute confidence in the traffic modelling, which is no substitute for open, comprehensive and consistent presentation of data and for engaging with challenges constructively. Later it described the process in some detail but the outputs – the spurious and extraordinary traffic modelled results - were not explained. It persisted with addressing questions about content with answers about methodology. It used arguments that did not withstand scrutiny and, when challenged, provided the same arguments. It failed to engage with substantive evidence submitted by us and others, and provided vague and unintelligible answers to questions. This severely impeded understanding of the traffic data and the scheme's impacts and led to the ExA asking serious questions about the traffic modelling even as the EiP closed.

⁹¹ REP7-025, 9.69.8

⁹² REP8-019, 9.75.34

⁹³ REP10-010, 9.84.13

⁹⁴ REP2-048 Local Impact Report 7.2.1

⁹⁵ REP2-046, High Peak Borough Council Local Impact Report, 19.1

(iii) Three working days before the EiP closed, NH supplied some explanation as to the disparities between some of the DfT observed traffic flows and modelled traffic flows in the 'do minimum' 2025 scenario [REP11-010, 3.1 page 13]. These explanations exposed local zone limitations as the cause of some of these disparities. These limitations are a good reason for using a more defined model of Glossopdale, something we and others had repeatedly requested throughout the EiP and been denied, and which NPSNN 4.2 requires.

(iv) Public interest in the integrity of the traffic modelling was extremely important for this scheme. The 2007 public inquiry into the Mottram-Hollingworth-Tintwistle bypass (the previous iteration of the scheme) was formally adjourned in December 2007 after 10 days of hearings due to serious flaws and repeated errors with the traffic model. Revised traffic figures due to an error in the traffic modelling were followed by further inconsistencies in feeding data into the traffic model⁹⁶ which ultimately rendered the results of the model null and void. The statutory consultees were unable to validate the traffic model and the public inquiry was formally closed in March 2009.

d. Uncertainty Log

NH's failure to engage constructively is also well demonstrated by its approach towards our challenge of the Uncertainty Log. In our written representation [REP2-069 4.2.11-4.2.17] we raised issues about the Uncertainty Log with respect to future development. A limited list was appended to the ES Ch.15 on Cumulative Effects. We found a much longer list in the Traffic Forecasting Package NH supplied to us [REP2-090, Appendix B, pdf pp 337/790] . We compared the results given in the DCO application documents with those available in the Traffic Forecasting Package, pointing out data was missing and asking for clarification on how the model had addressed future development. NH offered '*Details of the schemes and developments listed in the Uncertainty Log can be provided by National Highways if necessary*'. We responded '*As offered, please may we see the complete list, ie the long list and the short list, of schemes and developments excluded and included in the Uncertainty Log*⁹⁷'. NH responded⁹⁸ '*The uncertainty log is included in Appendices B & C of the Traffic Forecasting Report that has previously been provided by National Highways to CPRE*'. These were the very appendices which we had analysed in REP2-069 and to which we were seeking details and clarification. This circular game playing by NH was obstructive and did not address our concerns.

e. Investigation of Mottram Gyratory Flow (MGF)

⁹⁶ Mottram Tintwistle Public Inquiry 2007 HA-73 December 4th 2007; the Highways Agency announced that no more information would be available until late February 2008. It failed to meet this deadline and further deadlines in May 2008 and then October 2008.

⁹⁷ REP5-028, page 10

⁹⁸ REP7-025 9.69.18 page 14

One IP Mr Bagshaw presented the MGF as an alternative to the scheme. When asked by the ExA if the MGF alternative had been considered previously NH's response was an unequivocal 'No'⁹⁹. *'The Mottram Gyrotory Flow alternative presented in Mr Bagshaw's submission was not one of the alternative options considered by National Highways'...* *'The scheme previously proposed and presented in Mr Bagshaw submission was not one of the potential alternative solutions identified through this process'*. Towards the end of the EiP¹⁰⁰ the ExA was obliged again to ask NH to clarify its position as to whether the MGF, or a similar scheme was considered through options appraisal. The NH completely reversed its reply both orally at the hearing and in writing to a definitive 'Yes'. *'The option submitted by Mr Bagshaw was presented as an alternative scheme at the public inquiry of 2007. A scheme looking at a gyrotory system in the area of Mottram was assessed in 2015 as part of the EAST study; these were forwarded on to the DfT for consideration but were not included in RIS1¹⁰¹'*. Thus two directly contradictory answers were given by NH. Mr Bagshaw then showed that it had not been examined as a standalone option but only as an addition to the current scheme (REP8-042 para 5 pp 5-8).

f. Increase in vehicle kms

Both the TAR (7.2.9) and ES Ch.14 Climate referred to increases in vehicle kilometres generated by the scheme but no absolute figures were given. NH twice gave the opposite impression: *'Total vehicle kilometres across the appraised road network are effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic... and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys¹⁰²'*. Only in response to a question from the ExA, on 13th April (10 months after we originally asked for the figures) did NH reveal the increases in total vehicle kilometres due to the Scheme would be +0.7% (on approximately 12,000,000 daily veh-km in 2025) in the area of detailed modelling and +9.5% (on approximately 410,000 daily veh-km in 2025) in the Local Study Area¹⁰³. NH not only refused to supply the absolute figures to us but also denied there would any increase in vehicle kilometres.

g. A sensitivity test on the carbon emissions

NH submitted the results of the test but did not make the methodology of the test available¹⁰⁴. Nor did NH explain how the test affected the significance of the carbon emissions associated with the scheme. The validity of this test awaits DfT approval at some

⁹⁹ REP6-017 NH responses to ExA's second written questions Q3.8a

¹⁰⁰ REP8-019 Issue Specific Hearing 9.75.34 (kk) page 20

¹⁰¹ REP8-019 NH written summary of oral hearing 9.75.34 (kk) page 20

¹⁰² REP1- NH response to Relevant Representations RR-0543 page 147, 1st December; REP2-022 4.1 page 59

¹⁰³ REP8-019, 9.75.6

¹⁰⁴ REP5-026 2.2.5 onwards and Table 1; REP8-018 Appendix A

time in the future. Given this, it was incredible that this data was provided to the ExA as if it might add value to the ExA's recommendation to the SoS.

h. Visibility of the eastern portal of the underpass to the public

ES Ch.7, 7.9.25 implied that the eastern portal of the Mottram underpass would be visible from publicly accessible viewpoints. *'Views represented by Viewpoint 5 would be more open, with visibility of the new underpass structure and the cutting slopes present at the eastern portal'*. During site visits we searched from around Viewpoint 5 (on a public right of way) for visibility of the underpass structure but could not find it, and requested an accompanied site visit to view the eastern portal. In response NH considered *'that **all parts of the Scheme can be viewed from publicly accessible land, and thus we do not consider that an Accompanied Site Inspection will be required**¹⁰⁵'* (our emphasis). When we asked NH (email 22nd November) from where a full view of the eastern portal could be seen, it responded (21st December 2021) *'the only views of the eastern portal would be visible from private agricultural land containing no sensitive receptors'*. This is a complete contradiction to *'all parts of the scheme can be viewed from publicly accessible land'*.

i. Godley Green Garden Village (GGGV)

(i) GGGV is the largest proposed development within Greater Manchester, is included in Greater Manchester's emerging spatial framework Places for Everyone and would lie 1Km from the scheme on a road that joins the M67 J4 roundabout, at the western end of the scheme. The allocation is proposed to deliver 2,350 dwellings and would generate approximately 529 to 1,057 two-way vehicle trips during peak hours¹⁰⁶. Clearly this is a major development which would interact with the scheme. NH's approach towards the scheme's interaction with GGGV provided two diametrically opposed stances.

(ii) NH's assessment¹⁰⁷ for the DCO application records *'no significant cumulative effect'* as a result of the scheme with the GGGV development, a conclusion which is directly contrary to the Places for Everyone assessment in which NH participated. The latter records that traffic generated by this allocation is *'likely to result in material implications on the operation of the SRN that would require mitigation*¹⁰⁸ *'* at both the M67 J4 roundabout and M60 J24

¹⁰⁵ PDL-001 Letter dated 1st November 2022 to ExA regarding the Preliminary Meeting of the Examination

¹⁰⁶ 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

¹⁰⁷ ES Ch.15 Table 15-7 row 42

¹⁰⁸ 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

Denton Island¹⁰⁹ which lies 5-miles west of the scheme along the M67. Outside the EiP NH behaved as if the scheme would have significant effects: in response to TMBC's 2021 planning application 21/01171/OUT for GGGV, NH submitted a formal recommendation¹¹⁰ that planning permission is not granted for a specified period, as it did not have '*sufficient comfort that the development would not cause a detrimental impact to the SRN.*' The conclusions that NH reached in regard to the scheme's cumulative effects with GGGV are contrary to those evidenced by PfE and its own response to the planning application.

j. Transport for Greater Manchester's SOCG with NH

A prime example of delay is the handling of the SoCG between NH and TfGM. The initial version indicated TfGM was concerned with detailed design of traffic management [APP-192] but the second version in January 2022 briefly alluded to concerns about strategic planning issues [REP2-019]. The nature of the latter were not revealed until the next and final version of the SoCG appeared 4 months later during the final hours of the EiP [AS-010 and REP12-010]. Several new issues and new angles on known issues were disclosed as of concern to TfGM, all too late for scrutiny within the time frame of the EiP.

¹⁰⁹ 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

¹¹⁰ https://publicaccess.tameside.gov.uk/online-applications/files/9976136762C94B11142AEDBDD186C191/pdf/21_01171_OUT-CONSULTATION_RESPONSE_-NATIONAL_HIGHWAYS-1539049.pdf

LOW CARBON TRAVEL FOR LONGDENDALE AND GLOSSOPDALE

CPRE Peak District
and South Yorkshire

September 2022

Summary of full report
by Keith Buchan, MTRU

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future

Registered Charity No.1094975
Registered Company No. 4496754



LOW CARBON TRAVEL FOR LONGDENDALE AND GLOSSOPDALE

What's the problem?

The Longdendale villages of Tintwistle, Hollingworth and Mottram beside the A57/A628 trunk route experience severe environmental pollution from through-traffic of heavy lorries and commuter car traffic from Glossopdale. Travel in the area generates:

- High carbon emissions from traffic. Once released carbon emissions remain in the atmosphere for about 100 years. To have any chance of meeting carbon reduction targets, emissions need to be cut as soon as possible;
- Noise, air pollution and severance created by heavy traffic on residential roads;
- Noise, air pollution, severance and landscape impacts from the same traffic in the Peak District National Park;
- Unreliable journey times;
- Poor local conditions for walking and cycling which inhibit active lifestyles leading to poor health;
- Delays to local buses;
- Long journey times between Manchester and Sheffield.

Although the proposed A57 Link Roads (dual carriageway bypass of Mottram, single carriageway link to Glossop) would reduce traffic and its associated air pollution on Hyde Road in Mottram and Woolley Lane on the edge of Hollingworth (if traffic calming measures are effective), it would increase traffic, congestion, carbon emissions, air pollution, noise, road crashes and severance in Hollingworth, Tintwistle and Glossopdale. Its claim to alleviate unreliable long journey times is unsubstantiated. The scheme's infrastructure has profound impacts on the Green Belt, would increase traffic through the National Park and requires demolition of property. In order to avoid all these impacts CPRE the countryside charity sought a solution that would benefit everyone.

How would *Low Carbon Travel* address the problem?

A solution tailored to relieve Glossopdale and Longdendale of traffic impacts, enhance local countryside as a green lung for Greater Manchester and make door-to-door journeys by bus, foot or cycle a realistic, attractive and convenient option. CPRE's *Low Carbon Travel* includes:

- 1 Green Travel Planning for all;
- 2 Weight restriction of through traffic of heavy lorries;
- 3 Returning streets to the people;
- 4 Reshaping bus services with improved services and electric buses;
- 5 Linked traffic signals and new crossings to slow traffic and facilitate walking and cycling.

1 Green Travel Planning for workplaces and residential areas to:

- Inform people about existing alternatives to car use;
- Identify the barriers to using the alternatives;
- Develop improvements to bus services based on responses;
- Better integrate rail and bus services;
- Identify places for new cycle and walking routes;
- Pilot bike and e-bike deliveries from local shops;
- Implement the improvements, monitor and modify when needed.

2 A weight limit on through-traffic of heavy lorries (HGVs) across the Peak District National Park – this would force drivers to use the motorway box M1/M62/M60/M6/A50 around the area, significantly reduce traffic queues and free up road space for active travel. Reducing the numbers of lorries is extremely popular locally, and would require cooperation across a number of local highway authorities and enforcement of the weight restriction. Local businesses and local deliveries would not be affected. Such control schemes are feasible with Automatic Number Plate Recognition (ANPR), as in the London low emissions zone covering the whole metropolitan area and applicable to all lorries of 3.5 tonnes and over.

The control system could remove the heaviest HGVs which make up 90% of the through traffic or be set to remove all HGVs (over 7.5 tonnes). It would:

- Reduce the environmental damage and external costs (those met by public spending rather than by the operator of the vehicles): the largest HGVs are extremely damaging and cause much more noise, vibration, emissions and particulates than other vehicles. The most extreme example is damage to the road surface – the heaviest vehicles cause 180,000 times more damage than a car. Motorways are designed to minimise such external costs;
- Encourage streamlining of goods transport. Diversion of HGVs to longer routes would increase the costs of the current model used by operators. This would encourage more efficient use of vehicles, for example, minimising journeys of empty or partially empty vehicles (currently HGVs are empty for 28% of their travel).

3 Returning streets to the people – this would include slower speeds such as 20mph to make streets safe and pleasant, more space and facilities for cycling and walking with more protected road crossing points, and creation of a coherent local network for local walking and longer cycling journeys to work, school, shops, leisure, medical centres with links to Greater Manchester's Bee Network. A local group has begun the work with a focus on travel to school. E-cargo bikes would allow people to shop on-line or walk to and from the shops, and leave delivery to the e-bikes.

The public realm should be attractive and comfortable to use. Planters, benches, signalling and road surfacing would indicate that the space is shared, not for motor vehicles only (or even principally), and encourage more considerate driving.

4 Reshaping bus services – To provide integrated (bus and rail services), affordable, reliable and frequent services that meet people's needs and have priority on the road. Modern bus priority doesn't need continuous lanes – smart linked signals and bus gates achieve more for less. The package includes:

- The purchase and operation of 3 electric buses (comfortable, clean, air conditioned and with WiFi) which could be used to provide new services, for example the reintroduction of the X57 Glossop to Sheffield;
- A new service for Tintwistle, Hadfield and Glossop;
- Changes to the Woolley Bridge junction to provide a bus and cycle lane and priority entry;
- Bus gates at some pedestrian crossings to improve bus journey times;
- Introduction of incentives to tempt people out of cars and onto public transport.

5 Linked traffic signal controls – Along the trunk route and at M67 J4 modernising and introducing linked controls would improve safety, allow for bus priority without disturbing other traffic, break up queues and smooth the flow overall.

What would *Low Carbon Travel* cost?

The total costs would be £9.7million as listed below. No additional costs are given for signalisation of the M67 J4 roundabout. These would be modest if undertaken within the existing layout, but in the order of £5million if more construction work was needed.

Woolley Lane junction signalisation and provision of bus/cycle priority entry	£1,000,000
Three new signalised pedestrian crossings	£450,000
One new pedestrian crossing with bus gate	£250,000
One bus gate at existing crossing	£150,000
Two additional pedestrian phases at existing signals	£150,000
Three new electric buses	£1,000,000
Travel planning initial survey and planning	£500,000
Travel planning start up incentives 3 years @ £350k	£1,050,000
Walking route improvements (50 kms @ £5k)	£250,000
Cycling improvements (includes 50 kms plus parking and other incentives)	£500,000
20 mph speed limit plus public realm (20 kms @ £10k)	£200,000
HGV signs including advance warning on motorways	£1,200,000
Total	£6,700,000
Plus Optimism Bias 44% (a standard adjustment for underestimating costs)	£9,650,000

Would *Low Carbon Travel* provide good value for money?

Transport schemes must give value for money. For every £1 of public money spent, a scheme must provide more than £1 in the value of benefits i.e. a positive benefit cost ratio (BCR). At a cost of £181million, the A57 Link Roads has a BCR of 1.45 and is in the Government's 'low value for money' category. Our package has a BCR of 4.99, making it 'very high value for money'.

Low Carbon Travel for Longdendale and Glossopdale has been put together after talking to residents and visitors about their travel experiences and hearing their ideas for improvements. All of these ideas are currently in use – but not yet in this locality. Other measures such as a **local affordable EV car and e-bike share/hire scheme** would give people the flexibility of having access to an EV car or bike and allow them to do their bit to reduce climate emissions, without breaking the bank.

For more details please contact [REDACTED] The full report¹ can be found [here](#) .

We are most grateful to the Foundation for Integrated Transport, CPRE *the countryside charity*, CPRE North West Region and CPRE Yorkshire and Humber Region for supporting this project.

¹ <https://www.cprepsy.org.uk/news/low-carbon-travel-for-longdendale-and-glossopdale-full-report/>

Submission number: 10

Date submission received by PINS: 7 November 2022

Name: Linda Walker of High Peak Green New Deal

High Peak Green New Deal



Rt Hon Mark Harper
Secretary of State for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR



By email transportsecretary@dft.gov.uk

7th November 2022

Proposed A57 Link Roads

Dear Secretary of State

On November 16th you will be making the decision as to whether these proposed new roads, between Glossop and Stalybridge, will be built.

We have been speaking to people in Glossopdale, on their doorsteps and in the town centre, on many occasions over the last few months, and we have found that the vast majority are totally opposed to this plan.

Even Highways England have admitted ' this scheme does not do anything to relieve congestion in Glossop but attracts more traffic along the A57.'

It is the people who live in Hollingworth and Tintwistle, where lorries thunder past their doors, rattling their windows, who are most disappointed that this road will do absolutely nothing to reduce the noise and pollution which blights their lives.

We have been collecting signatures for a petition (attached) calling for abandonment of the road building plan and investing just 5% of the money saved into sustainable local travel. **Low Carbon Travel for Longdendale and Glossopdale**, which includes a weight restriction on through traffic of heavy lorries and investment in buses, walking and cycling, has been submitted to you recently by CPRE PDSY.

This has met with an enthusiastic response from most of those we have spoken to and must surely be the way to go if the UK is to meet its net zero targets. Signatures were collected online and by going door-to-door in Tintwistle, Hollingworth and Glossop. Our total of over 900 hundred exceeds the 700 supporters of the A57 Link Roads who made relevant representations that were so brief they were equivalent to signing a petition. Unlike all those comments many of our signatories supplied comments as to why the A57 Link Roads is a non-starter and will only make things worse for Tintwistle, Hollingworth and Glossopdale.

Our local MP Robert Largan claims to have 4,000 signatures on a petition for the bypass. However the exact wording of his petition is *'There should be no further house building until the A57 Link Roads are built.'* Clearly this is a petition against housing development which everyone in Glossop opposes, and is not a clear vote by numbers for the scheme. It should be rejected as a pro-bypass petition.

We urge you to reject the scheme and trial CPRE's Low Carbon Travel

Yours sincerely

A large black rectangular redaction box covering the signature of Linda Walker.

Linda Walker
Co-ordinator High Peak Green New Deal

A black rectangular redaction box covering contact information, likely a phone number or email address.

Submission number: 11

Date submission received by PINS: 7 November 2022

Name: Hayley Simpson

From: [Transport Secretary](#)
To: [POCorrespondence](#)
Subject: Fwd: A57 Link Roads - URGENT!
Date: 07 November 2022 18:32:42

Sent from [Outlook for iOS](#)

From: Hayley simpson [REDACTED]
Sent: Monday, November 7, 2022 5:36:04 PM
To: Transport Secretary [REDACTED]
Subject: A57 Link Roads - URGENT!
Dear The Rt Hon Mr Harper MP,

I am writing to you regarding A57 Link Road.

This scheme could affect my mothers house, [REDACTED]
[REDACTED] My mum was born in Mottram and has lived in Mottram ALL HER LIFE!!!

We are in the process of waiting for an engineer to assess to see if my mum's beloved home could be saved. We have been waiting for this engineer for several months. We have been treated with no respect, constantly ignored and promised we would be kept in touch every 2 weeks, this hasn't happened . National Highways have been unprofessional .

My mum's home is everything to her and myself and my daughter . As my late father built that house [REDACTED]
[REDACTED] So taking my mum's precious home which she has lived in for over 50 years would be utterly devastating for not only my mum but us all as we had always said this house was to be kept in our family. My poor mum is 90 years old and she lives independently in her precious home. How on earth is it acceptable to take the home she owns and has worked so hard for. It's disgusting and frankly unbelievable.THIS IS OUR LIVES!

The road itself is a waste of time; it is going right through the middle of Mottram, taking several houses in the countryside. A HGV BAN is needed on the A828 it would relieve traffic as much of the traffic is HGVS . Tintwistle and Hollingworth would still have all the traffic going through it would not make any difference at all to these villages. Glossop is a bottleneck anyway due to continued house building. The best solution would be to increase trains to Manchester and improve bus services; these are simple solutions that at least could be tried.

PLEASE PLEASE PLEASE DO NOT TAKE MY MUMS HOUSE FROM HER AND US an elderly lady pushed out of her own home. How can this be right in our lives? It made me very anxious. I can't sleep. We've done nothing wrong .PLEASE just leave us alone to have some peace. PLEASE! You know when I go on my daily walk, I walk past peoples houses and think aren't you lucky you're not having your house demolished . I am extremely worried about my mum as I've said she's 90 YEARS OLD. She cant cope with this anymore and neither can I PLEASE DONT TAKE HER HOUSE MR HARPER

Kind regards,
Michaela Bromley

[REDACTED]

This email has originated from external sources and has been scanned by DfT's email scanning service.

Submission number: 12

Date submission received by PINS: 7 November 2022

Name: High Peak Green New Deal

High Peak Green New Deal

Rt Hon Mark Harper
Secretary of State for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR

By email t [REDACTED]

7th November 2022

Proposed A57 Link Roads

Dear Secretary of State

On November 16th you will be making the decision as to whether these proposed new roads, between Glossop and Stalybridge, will be built.

We have been speaking to people in Glossopdale, on their doorsteps and in the town centre, on many occasions over the last few months, and we have found that the vast majority are totally opposed to this plan.

Even Highways England have admitted ' this scheme does not do anything to relieve congestion in Glossop but attracts more traffic along the A57.'

It is the people who live in Hollingworth and Tintwistle, where lorries thunder past their doors, rattling their windows, who are most disappointed that this road will do absolutely nothing to reduce the noise and pollution which blights their lives.

We have been collecting signatures for a petition (attached) calling for abandonment of the road building plan and investing just 5% of the money saved into sustainable local travel. **Low Carbon Travel for Longendale and Glossopdale**, which includes a weight restriction on through traffic of heavy lorries and investment in buses, walking and cycling, has been submitted to you recently by CPRE PDSY.

This has met with an enthusiastic response from most of those we have spoken to and must surely be the way to go if the UK is to meet its net zero targets. Signatures were collected online and by going door-to-door in Tintwistle, Hollingworth and Glossop. Our total of over 900 hundred exceeds the 700 supporters of the A57 Link Roads who made relevant representations that were so brief they were equivalent to signing a petition. Unlike all those comments many of our signatories supplied comments as to why the A57 Link Roads is a non-starter and will only make things worse for Tintwistle, Hollingworth and Glossopdale.

Our local MP Robert Largan claims to have 4,000 signatures on a petition for the bypass. However the exact wording of his petition is '*There should be no further house building until the A57 Link Roads are built.*' Clearly this is a petition against housing development which everyone in Glossop opposes, and is not a clear vote by numbers for the scheme. It should be rejected as a pro-bypass petition.

We urge you to reject the scheme and trial CPRE's Low Carbon Travel

Yours sincerely

Linda Walker
Co-ordinator High Peak Green New Deal



Mark Harper, Secretary of State for Transport,

722 people have signed a petition on Action Network telling you to Reject the Proposed A57 Link Roads Scheme.

Here is the petition they signed:

We call on you to reject the proposed A57 Link Road Scheme, which will not reduce congestion and pollution in Glossopdale, does not by-pass Hollingworth and Tintwistle and will make the Climate Crisis worse. This will save £180 million and we urge you to invest £10 million of this saving in developing low carbon alternatives in Glossopdale and Longdendale.

You can view each petition signer and the comments they left you below.

Thank you,

Green New Deal High Peak Hub

1. Daniel Barrass (ZIP code: [REDACTED])

This Bypass will cut right through my friends house, he will have to move from a house he's lived for years.

The bypass doesn't address the main problem of trucks taking a shortcut going over the Woodhead instead of going on the motorway like they should do, they endup clogging up the Glossop and hollingworth roads when coming off and on.

BAN THE TRUCKS FROM THE WOODHEAD!

2. robert price (ZIP code: [REDACTED])

3. Paul Schiffer (ZIP code: [REDACTED])

The link Rd will 100% cause a bigger mess than already is..... Why not ban trucks from the woodhead simple no more queues because it is the trucks that cause 80% of the queues. You know the link Rd will cause more jams in traffic stop and think

4. Anthony Cole (ZIP code: [REDACTED])

5. Andrew Higgins (ZIP code: [REDACTED])

Stop this waste of money now.

6. Amanda Holtey (ZIP code: [REDACTED])

7. Anne Ashton (ZIP code: [REDACTED])

8. Alex Banks (ZIP code: [REDACTED])

9. Abigail Bardsley (ZIP [REDACTED])

10. Abigail Hultmann (ZIP code: [REDACTED])

11. Michael Wignall (ZIP code: [REDACTED])

This is a terrible plan for Glossop.

12. Adam Gregson (ZIP code: [REDACTED])

13. Adam Short (ZIP code: [REDACTED])

To: Grant Shapps, Secretary of State for Transport

From: Adam Short

We are a young family who recently moved to Hollingworth. The heavy traffic, noise and pollution has a significant negative impact of our lifestyle, health and well-being. We are very disappointed that the proposed A57 link will not provide any relief from these major issues.

We call on you to reject the proposed A57 Link Road Scheme, which will not reduce congestion and pollution in Glossopdale, does not by-pass Hollingworth and Tintwistle and will make the Climate Crisis worse. This will save £180 million and we urge you to invest £10 million of this saving in developing low carbon alternatives in Glossopdale and Longdendale.

14. Adam Sharpe (ZIP code: [REDACTED])

15. Adrian Thurrell (ZIP code: [REDACTED])

This project has for 40 plus years, in all incarnations failed to satisfy requirements, while being expensive, environmentally counterproductive, and divisive. The correct solution is to reduce the need for road transport, e.g. by not converting business units into more housing in glossop.

16. Robert Callow (ZIP code: [REDACTED])

Congestion in and around Glossop has deteriorated markedly over the last 20 years. Large new residential estates have brought between 1,000 and 2,000 new cars to the town. The link roads are a waste of public funds at a time when the public purse is under great pressure.

17. Aidan Hall (ZIP code: [REDACTED])

18. Aimi Spinks (ZIP code: [REDACTED])

19. Amanda Webster (ZIP code: [REDACTED])

No relief for Tintwistle or Hollingworth. Just moves the problem away from Mottram.

20. Alan Jackso (ZIP code: [REDACTED])

Waste of money will not do anything for easing conjection

21. Amanda Dyson (ZIP [REDACTED])

This plan will adversely affect the already traffic-congested town of Glossop (as per National Highways report February 2022). In the current financial climate, spending £180 million on a scheme that is detrimental to the area is nonsensical and irresponsible

22. Alice Pike (ZIP [REDACTED])

23. Alison Bull (ZIP code: [REDACTED])

24. Alison Johnson (ZIP code: [REDACTED])

25. Allan Ward (ZIP code: [REDACTED])

26. Allen Standeven (ZIP code: [REDACTED])

27. Allison Reed (ZIP code: [REDACTED])

A better alternative would be a viable rail link

28. alyson metcalf (ZIP code: [REDACTED])

29. Amanda Ashworth (ZIP code: [REDACTED])

30. Amanda Wellings (ZIP code: [REDACTED])

This will in no way resolve the traffic through Glossop. All this does is make way to increase the housing population therefore increasing traffic in the area

31. Amy Large (ZIP [REDACTED])

32. Anne Robinson (ZIP [REDACTED])

33. Tracy Anderson (ZIP code: [REDACTED])

Improve public transport and reduce the number of cars on the road! Mottram and Glossop is a beautiful place to live and is far too heavily congested with traffic. Think of the environment!

34. Andrea Lyons (ZIP code: [REDACTED])

National Highways recognise that the scheme will not relieve congestion in Glossop, but will attract more traffic along the A57. We all would like to see less congestion on the A57, but I urge you to explore other low carbon travel solutions.

35. Andrew Brassington (ZIP [REDACTED])

Please review this waste of money.

36. Andrew Miles (ZIP code: [REDACTED])

37. Andrew Grantham (ZIP code: [REDACTED])

38. Andrew Baines (ZIP code: [REDACTED])

39. Andrew Kinnersley (ZIP code: [REDACTED])

Stop the link. It doesn't bypass any part of Glossop, Tintwistle or Hollingworth. It is expensive and will deliver absolutely no benefit to Glossop

40. Andy Tickle (ZIP code: [REDACTED])

41. Angela Dale (ZIP code: [REDACTED])

42. Angela Robinson (ZIP code: [REDACTED])

43. Anne Gange (ZIP code: [REDACTED])

I am signing because the new road will increase air pollution close to where I live.

44. ANNE SHAW (ZIP code: [REDACTED])

I have been waiting for HGV weight restrictions on A628 and A57 Snake Pass for years - neither of these routes went through the planning system to accommodate the traffic which now uses them. And the v steep and narrow winding Snake Pass has no safety let-out for the lorries which come down Sheffield with brakes smoking and have to stop to cool down.

45. Anne Wilkie (ZIP code: [REDACTED])

46. Jacqueline Froud (ZIP code: [REDACTED])

We need a proper bypass not a link road which will achieve nothing

47. Ann Midwood (ZIP code: [REDACTED])

48. Antonio Lopez (ZIP [REDACTED])

49. Arlene Allen (ZIP [REDACTED])

50. Annette Struttman (ZIP [REDACTED])

I feel the new proposed bypass will not solve the current issues with traffic. A weight restriction ban for trucks would be more effective or a bypass that actually bypasses the villages

51. Andy Williams (ZIP code: [REDACTED])

The business case for this road does not stack up.

52. Ayshea Garbutt (ZIP code: [REDACTED])

This will be costly and not improve the problem. If the recent works are anything to go by there are cheaper less invasive ways to improve traffic flow. Of course this will not provide for infill housing, but then there are probably better places for that which don't involve building on a flood plain.

53. Linda Bagshaw (ZIP code: [REDACTED])

This so called bypass will only move the traffic congestion from one place to another , everyone who lives around this proposed like can see this a complete waste of money , Put a weight restriction on woodhead pass , this will take a big burden off this road and make it easier for locals to get around

54. Janet Walker (ZIP code: [REDACTED])

55. JILL HUTTON (ZIP code: [REDACTED])

56. Barbara Fearnley (ZIP code: [REDACTED])

57. Bari Atreides (ZIP code: [REDACTED])

58. Barry Darwin (ZIP code: [REDACTED])

59. Barbara Helm (ZIP code: [REDACTED])

60. Rebecca Sweeton (ZIP code: [REDACTED])

This is not a bypass and will not solve the severe traffic congestion which is stifling Glossop. We need a proper bypass not an expensive spur road that's being put forward as a solution that will fix nothing except the ability for even more unwanted houses to be built along the new road. Another scam to fool people into thinking that something is being done when it's not. Give us a proper bypass!

61. Benjamin Dearnley (ZIP code: [REDACTED])

We call on you to reject the proposed A57 Link Road Scheme, which will not reduce congestion and pollution in Glossopdale, does not by-pass Hollingworth and Tintwistle and will make the Climate Crisis worse. This will save £180 million and we urge you to invest £10 million of this saving in developing low carbon alternatives in Glossopdale and Longdendale.

62. Sandie Kelsey-White (ZIP code: [REDACTED])

No ring road around Glossop

63. Neil Beck (ZIP code: [REDACTED] [REDACTED])

64. Rebecca Sykes (ZIP code: [REDACTED])

65. Bryan Blakeborough (ZIP code: [REDACTED])

66. M B (ZIP code: [REDACTED])

67. Steve Belfield (ZIP [REDACTED])

68. Ben Hartley (ZIP code: [REDACTED])

69. Ben Powell (ZIP code: [REDACTED])

Please roll back this ludicrous plan - this bypass provides no benefits for our area, will cause an enormous amount of environmental destruction, and will increase car and lorry usage in the area all at a time when we need to move away from car usage as soon as possible.

70. Berni Bowler (ZIP code: [REDACTED])

71. William Froud (ZIP code: [REDACTED])

The link road will not relieve congestion in Hollingworth or Tintwistle. All it will achieve is moving a traffic jam to arrive quicker in Glossop. The project is therefore a waste of public funds and should be scrapped in favour of a genuine bypass

72. Bill Vaughan (ZIP [REDACTED])

73. JACQUELINE RICCI (ZIP [REDACTED])

We need a complete solution not a half baked one that removes the traffic from Tintwistle. A place "also" where people "live" with a fear off walking outside the front gate and of being mowed down by lorries travelling at 50 mile and hour !!!

74. Carrie Bradley (ZIP code: [REDACTED])

This scheme will give the go ahead for hundreds more houses along the route which will reverse any benefits gained from the link road. I have to object as I live in the village of Hollingworth and have so all my life and this will increase the misery already suffered by the traffic problems that this road is meant to alleviate. The whole project stinks!

75. Trudy Carroll (ZIP code: [REDACTED])

76. Robert Warwicker (ZIP code: [REDACTED])

If any sections of route do become easier, it will simply encourage more cars to use the road and worsen congestion somewhere else

77. Tom Hall (ZIP code: [REDACTED])

Don't need more traffic over snake pass or wood head

78. Brenda Thompson (ZIP [REDACTED])

79. Lorraine Parker (ZIP [REDACTED])

80. Brian Spaul (ZIP [REDACTED])

81. Michael Sanders (ZIP code: [REDACTED])

82. James Brotherton (ZIP code: [REDACTED])

In in FAVOUR of the link road tbh if it was completed 52yrs ago as originally discussed at i believe a cost of 3 million pound we wouldn't be in this mess with traffic now , also is it ok for local councils to

destroy GREEN BELT areas to build more houses without even considering to impact of more vehicles on the roads ,and not even thinking about extra schools ,hospitals, doctors to name a few ,STOP sending TAX payers money ABROUD and sort this country OUT FIRST instead of arguing in Parliament about what should and shouldn't happen get your HEADS together and sort THIS ONCE PROUD COUNTRY OUT instead of us being a laughing stock with wh o was a bumbling person of a Prime minister

83. Bruce Levitan (ZIP code: [REDACTED])

This is an environmentally unsound project that will not help traffic flow but actually increase it through vulnerable residential areas in Hadfield and Glossop.

84. Jane Jackson (ZIP code: [REDACTED])

Stop this waste of money your killing our village and the environment waste waste waste!!!!'

85. Lavinia Burditt (ZIP code: [REDACTED])

86. Christopher Barrow (ZIP code: [REDACTED])

Complete waste of time.

A bypass round all three villages needed. But it's nothing new the idea was mooted in 1937 !

87. Cilla Hollman (ZIP code: [REDACTED])

The proposed plan would be a disaster for Hollingworth, Tintwistle and Glossop, even if it does bring some benefits for Mottram alone. Please do the right thing in terms of both our local communities and the terrible environmental impacts of the proposal: reject it.

Thank you!

88. Carol Beckett (ZIP code: [REDACTED])

The A57 link road does not address the original brief, which was to design a bypass (requested 40 years ago at least) that would take the noise, pollution and danger of dense, heavy, huge traffic through the very narrow streets of Hollingworth and Tintwistle, Derbyshire.

Instead a very small area of Mottram, Tameside will benefit, which is good, but leaves Tintwistle and Hollingworth with minimal benefit and Glossop, already suffering from heavy traffic in narrow streets with much more traffic, pollution and noise.

It would be better to drop the idea and invest in better, cheaper electric public transport, reinvigorate the train services, build a station at Gamesley (needed for over 30 years) and reopen the train line through Woodhead. Even more importantly, build safe, comprehensive cycle routes and encourage people to cycle, even if electric. This is a much better environmentally healthy solution given climate change issues and people's health.

Other countries are doing it because they care. We should. The conservatives conserve, let's conserve the planet and our children's health and future.

89. Gerry Cain (ZIP code: [REDACTED])

90. Sarah Roberts (ZIP code: [REDACTED])

This scheme does very little to benefit residents in the affected areas and will not improve traffic volumes. In fact, the number of vehicles has been modelled to increase substantially. £180 million to make things worse, no thanks.

91. **Kay Callan** (ZIP code: [REDACTED])

92. **Margaret Roberts** (ZIP [REDACTED])

93. **Carol Brough** (ZIP code [REDACTED])

I think low carbon travel including much better (and safer!) cycling infrastructure is much more important than laying even more tarmac to bring more heavy traffic to the area.

94. **Nichole Bahrt** (ZIP cod [REDACTED])

95. **Chae Berry** (ZIP code: S [REDACTED])

96. **Charlotte Kinnersley** (Z [REDACTED])

I don't think this bypass will solve any issues with traffic, I think it is a waste of money.

97. **Christian Heintzen** (ZIP [REDACTED])

98. **nick chesterton** (ZIP co [REDACTED])

99. **Chloe Harwood** (ZIP cod [REDACTED])

100. **Chloe Lamb** (ZIP code: [REDACTED])

101. **Chris Green-Buckley** ([REDACTED])

The disruption to residents and the increased volume of traffic in the area would be unacceptable

102. **Chris Bangs** (ZIP code: [REDACTED])

No benefit would be experienced in Glossop or any reduction in congestion

103. **Christine Gill** (ZIP code [REDACTED])

104. **Christine Keogh** (ZIP c [REDACTED])

105. **Christine Nudds** (ZIP c [REDACTED])

106. **Christine Kirkham** (ZI [REDACTED])

A weight restriction would significantly reduce congestion and should be tried. Glossop spur could be built from the existing road. No relief for Hollingworth, Tintwistle or residents near Roe Cross Road and Back Moor. Please think again!

107. **Cid Schaller** (ZIP code: [REDACTED])

108. **Kim SCRAGG** (ZIP code: [REDACTED])

Stop the bypass and the proposed 750 houses on Mottram Moor

109. Joseph Scragg (ZIP code: [REDACTED])

Moves the problem upstream

110. Roger Clarke (ZIP code: [REDACTED])

111. Catherine Hughes (ZIP code: [REDACTED])

112. Charlotte Farrell (ZIP code: [REDACTED])

113. Stephen Bagshaw (ZIP code: [REDACTED])

I made all my comments during the online Public Inquiry at which NH were disingenuous with both their information and their railroading of alternatives. A total sham of an Inquiry and barely a pretence of democracy.

114. Courtney Doodson (ZIP code: [REDACTED])

115. Catherine Quirke (ZIP code: [REDACTED])

116. Sharon Craig (ZIP code: [REDACTED])

117. Craig Watkins (ZIP code: [REDACTED])

Improve public transport links and connection hubs and make it all free. No more roads.

118. Enid Crilly (ZIP code: [REDACTED])

I totally agree that this bypass will not help the local residents of Glossop, Hollinsworth or Tintwistle. It will bring more traffic.

119. Curtis mcloughlin (ZIP code: [REDACTED])

120. William Dyson (ZIP code:)

121. William Dyson (ZIP code: [REDACTED])

This planned link road will only create more traffic issues for Glossop, improved public transport systems would bring greater benefits

122. Dave Chant (ZIP [REDACTED])

123. David Spiers (ZIP [REDACTED])

124. Danae Crofts (ZIP code: [REDACTED])

125. Cockin Danielle (ZIP [REDACTED])

126. Daniel Shaw (ZIP [REDACTED])

127. David Southall (ZIP code: [REDACTED])

128. David O'Brien (ZIP code: [REDACTED])

100% oppose current proposals, waste of time, Grant Shapps don't waste money and time on the a57 road links, it's widely regarded as a folly project in the community and will increase traffic in and around Glossop, cause 2 years of disruption for a poor end result, not to mention cost nearly a 5th of a billion pounds of tax payers money.

129. David Willis (ZIP code: [REDACTED])

130. David Money (ZIP code: [REDACTED])

Having lived in Glossop for the past 40+ years it is obvious to all who live and have travelled out of Glossop daily to work that this proposed bypass will not help Glossop residents. Only cause extreme disruption whilst under construction. Only a bypass that routes all the M67 traffic out of the local small towns etc will help.

131. David Eglin (ZIP code: [REDACTED])

132. Caroline Phillips (ZIP code: [REDACTED])

133. David Higham (ZIP code: [REDACTED])

134. David Witty (ZIP code: [REDACTED])

135. David Lally (ZIP code: [REDACTED])

136. Debbie Wedlock (ZIP code: [REDACTED])

137. Debra Paddon (ZIP code: [REDACTED])

138. Deborah Davidson (ZIP code: [REDACTED])

We need a proper bypass for Glossop, not the currently proposed A57 link road which is nothing but a half measure sending more traffic through Glossop, associated villages and the mountain passes. Snake pass has already suffered a landslide earlier this year and more HGVs won't help. The current plans increase the likelihood of further collapse. This is all in addition to other environmental concerns pointed out in the petition.

139. Derek Bodey (ZIP code: [REDACTED])

Building roads simply increases traffic and does not solve congestion

140. Derek Watson (ZIP code: [REDACTED])

The proposed bypass will do exactly what it's called: bypass Mottram.

It will not be of any advantage to the larger area of Glossop and surrounding villages.

There's a general assumption that it's a Glossop bypass so there are many people who will be disappointed with the results when the money has been spent and the inevitable disruption suffered

during construction and the traffic is no different than now.

Stop working on the Mottram bypass and review the plans for a bypass to help the whole area, from M67 to Crowden or further still.

141. Lynne Davies (ZIP code: [REDACTED])

The link road is not beneficial to us residents of Tintwistle as it will not lower the volume of traffic through the village at all.

142. Deleen Whitaker (ZIP code: [REDACTED])

I totally agree that the Bypass will not solve the flow of traffic in the area. Actually, I am used to the level of traffic and can usually plan my trips without too much hiccups. From observation, the main traffic problem is road works, vehicle obstructions and accidents which we all have to deal with now and then. I would dread the noise level, the disruptions and heavy vehicles trudging along from the lengthy dusty work creates by a Bypass. I haven't seen anyone with placards or passion demanding a Bypass. People are getting along fine without it. And how wonderful it is to enjoy the greenery around us. Why spoil it with more machinery. Sorry, a Bypass will not improve journey reliability (no complaints here) and local communities are already connected by the routes that we use at present. So my support goes to 'No Bypass Please.' Spend the money wisely on the needs around us. Thank you.

143. Christine Walton (ZIP code: [REDACTED])

please access my comments given previously. Add my name

144. Diane Taylor (ZIP code: [REDACTED])

Not convinced

145. Diane mcloughlin (ZIP code: [REDACTED])

146. Diane Fildes (ZIP code: [REDACTED])

147. Dick Bateman (ZIP code: [REDACTED])

148. Dominic Stone (ZIP code: [REDACTED])

149. Dorothy Hodgson (ZIP code: [REDACTED])

150. Dorothy Hulme (ZIP code: [REDACTED])

151. Anita Dunham (ZIP code: [REDACTED])

Waste of time and money. It will not help with congestion in Glossop it will be worse.

152. William Binns (ZIP code: [REDACTED])

153. Joan Bodey (ZIP code: [REDACTED])

New roads just increase traffic - we need to learn to travel differently

154. Daniel Wimberley (ZIP code: [REDACTED])

"the case for this road is pitifully weak" I wrote in my very first outline letter to the public inquiry.

The more I learn about this scheme the truer those words become.

155. Eric Batchelor (ZIP code: [REDACTED])

I think the proposed plan is just moving the problem not solving it. Restrict HGV traffic thru Mottram and Hollingworth and save the money

156. Chris Todd (ZIP code: [REDACTED])

We don't need more roads, we need less traffic

157. Eileen Green (ZIP code: [REDACTED])

This proposed bypass will just move congestion from one side of Mottram to the other and will do nothing for Hollingworth and Tintwistle. A weight limit on the A57 and A628 would be better. The A628 is too narrow for heavy goods vehicles.

158. Elaine Clarke (ZIP code: [REDACTED])

They need to get all the waggons and artic lorries off the A57 Tintwistle and Hollingworth route, and on to the M67 motorway.

159. Elaine Turner (ZIP code: [REDACTED])

You are ruining lives by forcing families out of their beautiful homes and losing their livelihoods if they work from home too. Please consider the effects on these people and their young families too and all for no good!

160. Elaine Carefoot (ZIP code: [REDACTED])

161. Eleanor Duckworth (ZIP code: [REDACTED])

Working with what we have and building on it eg better rail and bus networks makes far more sense than creating something new that is going to cost huge amounts of money and that isn't going to be of significant benefit to many, if any. It sounds like we are not working towards a more ecological future with the bypass. - Encouraging road use, congestion, pollution, car travel....

Improved cycle networks would be amazing. I used to live in Exmouth, Devon which had fantastic cycle networks up the estuary to Exeter. We could have that too. And amazing efficient affordable local public transport benefitting everyone. Imagine if we adopted some of Europe's models for public transport...AMAZING!! HS2 felt like an ecological disaster in terms of the destruction of ancient established woodlands and animal habitat. Again to the benefit of only a few of the population. When that money could have been invested in improving local networks. Don't make the same mistake again. Here's to actually taking action to reduce our carbon footprint and create a healthier population with low carbon alternatives. You can do it. Thank you in advance.

162. Elizabeth O'Callaghan (ZIP code: [REDACTED])

163. Ella Grantham (ZIP code: [REDACTED])

164. Eleanor Eardley (ZIP code: [REDACTED])

Invest in better public transport

165. Elspeth Levitan (ZIP code: [REDACTED])

please please use this money to support affordable public transport including reinstating buses and trains cut in the last 3 years

166. Emily Wardman (ZIP code: [REDACTED])

167. Emma Lawrence (ZIP code: [REDACTED])

No, no, no. The latest incarnation of this scheme is no better than previous versions. Why won't you even try to invest in alternatives before ploughing on ahead with this? The figures don't add up (as usual) and the problem is simply being moved around and then made worse.

168. Emma Beck (ZIP code: [REDACTED])

169. Emma Dixon (ZIP code: [REDACTED])

This proposal will not improve the traffic problems in our area and increase traffic problems, pollution and be harmful to our local wildlife and natural environment. Please invest in green solutions and integrated public transport systems to solve the problems.

170. Emma Rawson (ZIP code: [REDACTED])

171. Charlotte Davies (ZIP code: [REDACTED])

172. Valerie Robertson (ZIP code: [REDACTED])

The proposal will be ineffective and a waste of money

173. Esther Myers (ZIP code: [REDACTED])

174. Howard Booth (ZIP code: [REDACTED])

175. Eve Waterside (ZIP code: [REDACTED])

Please stop this ridiculously out dated plan that doesn't even solve the problem it is meant to solve. We want better cycling, walking, and bus routes, better rail provision, and an active travel plan, not more cars on our roads, polluting our lungs, and heating the planet.

176. Guy Riddell (ZIP code: [REDACTED])

This spur road is not what is needed - we need a bypass of the villages Mottram, Hollingworth and Tintwistle with a road befitting the status of a trunk road.

Diverting a fraction of the traffic through a farmers field is a waste of money, and will not remotely improve the traffic flow.

177. Chris Keating (ZIP code: [REDACTED])

178. Mary Findlay (ZIP code: [REDACTED])

This will only move traffic jams from one part of Mottram Moor to another.

179. Mary Fitton (ZIP code: [REDACTED])

There will be no traffic reduction along the A628. In fact it will encourage more traffic thereby causing congestion in Tintwistle and Hollingworth

180. Florence Woolley (ZIP code: [REDACTED])

181. Nick Doran (ZIP code: [REDACTED])

The A57 link road application states that traffic will increase in other areas of the local network. Which means more pollution, as well as congestion, in areas that are built-up, and already have issues with both. Glossopdale and Longdendale will not benefit from this road.

Less money, conceivable less than a tenth, could be spent improving local public transport as well as multi-user path, cycleway and footpath improvements. These would have a much greater impact on local congestion and air quality.

182. Gabriella Lindergard (ZIP code: [REDACTED])

I completely agree that the suggested bypass will only attract more cars and not solve the problem of congested roads out of Glossop. There needs to be other options available eg trains and cycle paths so that people can choose not to drive!

183. Gabi Brown (ZIP code: [REDACTED])

184. Gale Blackburn (ZIP code: [REDACTED])

185. Garry Burning (ZIP code: [REDACTED])

186. Gary Ferguson (ZIP code: [REDACTED])

Waste of public money does nothing to address the real problems . I have been surprised , considering the traffic problems in the area at the amount of opposition to this scheme . Having said that it is a bad planning and seems to depend on solving the problems for Hollingworth/ Tintwistle further down the line . (Literally)

187. Laura Gathercole-Turner (ZIP code: [REDACTED])

Pointless won't ease congestion and my house is directly affected. More pollution will be created as you build the road. Not a great environment for my one year old

188. Gavin Young (ZIP code: [REDACTED])

The traffic and air quality in central Glossop is absolutely appalling. This link is not the answer however I am nervous that the money allocated will vanish if other ideas are raised and the link does not happen. Industrial lorries and commercial transport should not use this small town and its roads as cut through. All road capacity laws are currently being broken.

189. Gemma Ball (ZIP code: [REDACTED])

190. Ged Carney (ZIP code: [REDACTED])

191. Gerard Fildes (ZIP code: [REDACTED])

Introduce a weight limit

192. GEOFFREY HAMER (ZIP code: [REDACTED])

I was born & brought up in Glossop, and remember Mottram Moor well... The bypass is just shifting the problem further down towards Hollingworth.
Re-opening Woodhead would be money better spent.

193. Geoff Kirkham (ZIP code: [REDACTED])

194. Geoffrey Taylor (ZIP code: [REDACTED])

May do more harm than good

195. George Bowler (ZIP code: [REDACTED])

I fully support the petition arguments. Invest the saving to Re open the Electric Woodhead Line. This will provide links to Sheffield for freight & passenger and easily improve Northern England and Manchester travel in one project. Loss of greenspace and the carbon footprint from the cement alone involved in road building should force a rethink of this scheme.

196. Gerry Dominey (ZIP code: [REDACTED])

197. Gerry Nolan (ZIP code: [REDACTED])

Despite the fact that there are vast amounts of underground water in the area, with inherent risk of flooding if excavations took place, Highways seem intent on forcing this scheme through, without ever having investigated any other solutions, such as weight restrictions on the constant stream of HGV's that use the A628 and A57 as their shortcuts, rather than use the available Motorways.
We will lose our home of 28 years, plus, so that an uncalled for 'bridle path' can be constructed, after the ground on which our house currently stands has been demolished, to provide parking facility for 'Plant'.

198. Gaynor Miskell (ZIP code: [REDACTED])

This so called bypass will do nothing but add to the number of vehicles on our already heavily congested roads.. Myself and many other local residents, feel the very description of the so called "Bypass" is nothing but a smoke screen to build yet more houses and hence put even more traffic on this small towns main road (A57) in and out.. We are over subscribed in every area of public services and Schools, but still our local council are being forced by the government to build more houses.. some of which are being built, bought, then rented out as air b&bs.. and you tell us people need homes...really?? This once lovely rural little milltown is fast becoming one huge sprawling housing estate, with a never ending traffic jam, at the expense of our wonderful and much valued wildlife and local green spaces..

This town can take no more!! If you don't believe me, come take car ride here and see for yourself..

199. Gillian Simpson (ZIP code: [REDACTED])

200. Gillian Phillips (ZIP code: [REDACTED])

201. Gwyneth Price (ZIP code: [REDACTED])

202. Lynne Matthews (ZIP code: [REDACTED])

A bypass will cause more problems instead of solving them. It will increase traffic and pollution and damage the environment. The real solution is to improve public transport thus reducing the need for more roads

203. Julie Godfrey (ZIP code: [REDACTED])

204. Peter Godfrey (ZIP code: [REDACTED])

This road is within 120m off my 55 year old house , the noise and vibration will be unbearable , not to mention £240 million could be better spent on the health service , instead of being on a road that only bypass one set off traffic lights ,

205. gordon gange (ZIP code: [REDACTED])

The Glossop 'Spur' will only filter traffic into Glossop. I can't understand why Mr Langan, who apparently lives on the A 57, can want it. The air quality in Glossop is already over the limits, or nearly so, and the only place that will benefit is Mottram, which isn't even in his constituency. Please respect the petition and use the money for something that will help the air quality.

206. Grace Frazer (ZIP code: [REDACTED])

207. Michael Lee (ZIP code: [REDACTED])

208. Gwen McKenzie (ZIP code: [REDACTED])

209. Rhia Fearn (ZIP code: [REDACTED])

210. Gwyneth Francis (ZIP code: [REDACTED])

211. Hannah Wakley (ZIP code: [REDACTED])

212. Hannah Beesley (ZIP code: [REDACTED])

213. Harry Broom (ZIP code: [REDACTED])

214. Hazel Jones (ZIP code: [REDACTED])

We do not need a new road ruining our countryside . The issue is the lights at the top of the Moore . If someone had a brain they would be able to resolve this without the need to build a road . This new proposed road is just moving traffic from one place to another and will bringing 25% more traffic through . It's a disgrace .

215. Hannah Charlesworth (ZIP code: [REDACTED])

216. Hannah Dyson (ZIP code: [REDACTED])

217. Heather Doran (ZIP code: [REDACTED])

218. Heather Truelove (ZIP code: [REDACTED])

219. Hannah Belli (ZIP code: [REDACTED])

The proposed bypass won't make any difference to the traffic volumes in Tintwistle.

220. Hedley Nichols (ZIP code: [REDACTED])

221. Helen Ryan (ZIP code: [REDACTED])

This scheme will not relieve traffic in Glossop and a fraction of the money could be far better spent improving active travel and public transport options. Our train service and bus service is awful and cycle routes non-existent. All of these urgently need to be improved to encourage as many people as possible away from cars for short journeys where they are able. This will not only reduce traffic but is a vital contribution to combatting climate change.

222. Helen Bowler (ZIP code: [REDACTED])

223. HELENA GANNON (ZIP code: [REDACTED])

224. Helen Aczel (ZIP code: [REDACTED])

I simply cannot see that the scheme will solve traffic problems in the area.

225. Helen Vernon (ZIP code: [REDACTED])

I reside in Mottram and the proposed A57 link road will not resolve the traffic issues but merely push them into Hollingworth

226. Heather Rodrigues (ZIP code: [REDACTED])

227. Helen Ferguson (ZIP code: [REDACTED])

Huge disruption to residents

228. Danielle Berry (ZIP code: [REDACTED])

229. Lucie Bradley (ZIP code: [REDACTED])

230. Philip Bradley (ZIP code: [REDACTED])

231. Hilary Foster (ZIP code: [REDACTED])

232. Hilary Hebron (ZIP code: [REDACTED])

233. Dermot Foster (ZIP code: [REDACTED])

After careful study, I'm not convinced that the proposed by-pass will improve the situation. It just

moves the bottle-necks about a bit. In fact for Mottram and Tintwistle it could make it worse. Too much traffic is the basic problem. Far better to invest in public transport.

234. Chris Hill (ZIP code: [REDACTED])

I beg with all my heart that this bypass does not go ahead and destroy our families lives. The bypass will not give people the result their looking for and is only being done half heartily which your aware of. The last 5 years have been awful and if this bypass happens with the amount of stress we've been through, this will not been the end. Leave everything as it is, you've caused enough stress, headache and anxiety as it is.

I really hope these message are read and taken in to concieration!

235. helen Jobson (ZIP code: [REDACTED])

Will not improve anything. Congestion will be as bad as ever.

236. Holly Markin (ZIP code: [REDACTED])

237. Holly McBride (ZIP code: [REDACTED])

Please invest in green public transport options rather than increasing reliance on individual cars. The need and reasons for this are obvious. A short link road is only a very temporary solution to easing congestion in a tiny area. We need direct public transport links to Sheffield such as the X57 bus which was trialled in the middle of the covid pandemic. We need more frequent bus links to New Mills. The trains need to run more reliably and be more affordable. We need cycle lanes and increased bike storage in towns. We need considerate town planning. We do not need an enormous road through countryside and the increased traffic that this will bring.

238. Rachael Holmes (ZIP code: [REDACTED])

To: Grant Shapps, Secretary of State for Transport
From: Rachael Holmes

We are a young family who recently moved to Hollingworth. The heavy traffic, noise and pollution has a significant negative impact of our lifestyle, health and well-being. We are very disappointed that the proposed A57 link will not provide any relief from these major issues.

We call on you to reject the proposed A57 Link Road Scheme, which will not reduce congestion and pollution in Glossopdale, does not by-pass Hollingworth and Tintwistle and will make the Climate Crisis worse. This will save £180 million and we urge you to invest £10 million of this saving in developing low carbon alternatives in Glossopdale and Longdendale.

239. brian Binks (ZIP code: [REDACTED])

The bypass will do nothing to alleviate the congestion in Hollingworth and Tintwistle but will in fact make it worse due to introducing another choke point in the way of another junction slowing traffic en route TO THE M67 thus causing more fumes and pollution

240. Claire Terry (ZIP code: [REDACTED])

Glossop is turning into a car park! We cannot take anymore builds and this road is going to do nothing for congestion due to the bottleneck we have at Woolley bridge road.

I travel 8 miles to work each day and it takes me up to an hour! This is ridiculous but my job requires me to use my own car in working hours.

The tintwistle road has already been labelled as one of the worst roads for carbon monoxide and pollution.

Why not put money into reliable and frequent public transport? Better cycle pathways so that people feel safe and healthy riding the roads.

241. Iain Coram (ZIP code: [REDACTED])

242. Iain Robinson (ZIP code: [REDACTED])

243. Elizabeth Wood (ZIP code: [REDACTED])

This bypass will make no difference at all and cause horrendous traffic issues whilst under construction. There needs to be a weight limit put on the A57 through Hollingworth to take all the lorries via the M62. This will significantly reduce the amount of traffic at a stroke.

244. Ian Makin (ZIP code: [REDACTED])

This scheme will not work. We need to go back to earlier schemes with roundabouts which did stand a chance of working.

245. Ian Brown (ZIP code: [REDACTED])

246. Ian Marsden (ZIP code: [REDACTED])

247. Ian Rivers (ZIP code: [REDACTED])

Not fit for purpose.

248. Paul Woolley (ZIP code: [REDACTED])

249. Isabelle Orford (ZIP code: [REDACTED])

250. Stewart Brown (ZIP code: [REDACTED])

The cuts in the train services to Manchester added to the loss of the 236 and X57 and other bus services in the last couple of years have meant even more people have been forced to use a car and so generate more traffic in the area. The proposals don't recognise the impact of that. Improving local trains and buses would be more beneficial to the environment and economy.

251. James Montaldi (ZIP code: [REDACTED])

The traffic through the town of Glossop has been steadily increasing since I moved here 10 years ago. The centre of town is a bottleneck. The proposed road would funnel even more traffic through the town, on the way between Manchester (and surrounds) and Sheffield.

252. Jackie Croft (ZIP code: [REDACTED])

A huge waste of money pushing traffic queue into Hollingworth

Outdated plan.

253. Jade Grayson (ZIP code: [REDACTED])

254. Jack Sharples (ZIP code: [REDACTED])

No evidence it will work. Taxpayer money wasted. Disruption to residents.

255. James Leary (ZIP code: [REDACTED])

256. Janet Taylor (ZIP code: [REDACTED] UK)

I am unable to see the benefit since traffic will build up on the A57 in Glossop centre. The planned route crosses the flood plain behind Home Farm on Brookfield. Surely there should be a weight embargo on the A628

257. Jane Bassham (ZIP code: [REDACTED])

258. Jane Reynolds (ZIP code: [REDACTED])

259. Jane Winterbottom (ZIP code: [REDACTED])

260. Jane Hallett (ZIP code: [REDACTED])

261. Janet Lees (ZIP code: [REDACTED])

We need low carbon solutions not this.

262. Janet Jones (ZIP code: [REDACTED])

263. Lee Mitcheson (ZIP code: [REDACTED])

264. Janet Brown (ZIP code: [REDACTED])

The proposed 'A57 Link Roads' would undoubtedly increase traffic congestion and air pollution through the villages of Hollingworth and Tintwistle. These roads would provide no relief from traffic in these areas and would only serve to move the point of congestion from the top of Mottram Moor to the bottom of Mottram Moor, destroyed greenbelt in the surrounding countryside.

I call for this scheme to be rejected in favour of a low carbon travel option.

265. Janet Partridge (ZIP code: [REDACTED])

266. Janet Bower (ZIP code: [REDACTED])

267. Jan Horvath (ZIP code: [REDACTED])

268. Jasmin Cheung (ZIP code: [REDACTED])

269. Jason Farrow (ZIP code: [REDACTED])

The only bypass we need must bypass mottram hollingworth and tintwistle, the current plans are a complete waste of money and will achieve nothing

270. Jason Hall (ZIP code: [REDACTED])

271. Jayne Ward (ZIP code: [REDACTED])

We moved to Mottram in February to live a more semi rural life. I don't want to see our eco system, green belt land taken away. All that is happening is by going ahead is just moving the problem to another part of the area. Instead I propose putting a ban in place of Lorries (unless going to a domestic property) and making them use the motorway. The A57 is simply being used as a cut through. Why not try it for a year n complete a study to see what a difference this would make!

272. Jon Clarke (ZIP code: [REDACTED])

Clean & Green affordable public transport is what Glossop needs.

273. James Carrick (ZIP code: [REDACTED])

This is not the bypass we were promised and will make little to no difference to the traffic problems and pollution

274. John Scaife (ZIP code: [REDACTED])

Bypass should be to the M1 from the M67 like first planned. This is only avoiding Woolley bridge and pushing all the traffic to Brookfield which is a nightmare on the best of days traveling past Glossop caravans and Shaw lane is basically a one way street! And that's not even mentioning the greenery we will lose and all the wildlife, how is the government this clueless or do they just like to spend our money to make things worse.

275. Kenneth Blackburn (ZIP code: [REDACTED])

More traffick noise a day fumes
12000 more vehicles less daily than passing through now
Peace and quiet on local walks lost

276. Jeff Brown (ZIP code: [REDACTED])

Agree, complete waste of resources that will destroy some of the remaining green space in the area. This is just one of many bypass plans that have been rejected over the years and for very good reason!

277. Jen Morement (ZIP code: [REDACTED])

278. Jennifer Parker (ZIP code: [REDACTED])

279. Jenny Davenport (ZIP code: [REDACTED])

280. Jayne Owen (ZIP code: [REDACTED])

This will not help commuters or the environment, put the money into better, more frequent and more reliable Public Transport links

281. Jeroen Peters (ZIP code: [REDACTED])

From being in support to this scheme, it is now clear that this current plan does not achieve its stated aims. I would therefore urge you to look at serious alternatives that are also likely to be cheaper.

282. Jerome Conreen (ZIP code: [REDACTED])

The proposed A57 Link Roads scheme will do nothing to help traffic in the area. zits just a front building expensive new build houses on greenfield sites in an area already struggling to provide basic infrastructure for the current inhabitants.

283. Haydn Jones (ZIP code: [REDACTED])

I definitely agree that this short sighted scheme should be scrapped. Even the people who were putting this forward agreed it wouldn't help the traffic congestion in Glossop but would likely make it worse. There are other ways to provide immediate relief by looking at weight restrictions on local roads. The solution will need to be a holistic approach not a short term measure that will make things worse.

This government has not been open and honest about the impact on Glossop, Hollingworth and Tintwistle of the Glossop Spur Road.

There was a solution put forward many years ago but buildings have been built where the new road had been planned to go. Now a sustainable solution could well be a tunnel built under the sensitive areas around the back of Mottram, Hollingworth and Tintwistle. Whilst this would be expensive we have been suffering for so many years that surely it is our time to have some money spent here rather than in the south of England.

284. Jill Chambers (ZIP code: [REDACTED])

We need to reduce travel by car, this will increase it.

285. Jill Brooks (ZIP code: [REDACTED])

286. John Loughney (ZIP code: [REDACTED])

287. Jo Meek (ZIP code: [REDACTED])

288. Joanna Collins (ZIP code: [REDACTED])

The millions of pounds planned to be spent on this shcmeme would be much better spent on public tranport. Also, the A57 is unstable, with serious land slips recently. Encouraging more traffic along it is against all reason.

289. Joanna Watson (ZIP code: [REDACTED])

290. Bill Vaughan (ZIP code: [REDACTED])

291. Joan Stott (ZIP code: [REDACTED])

Will not solve problems of congestion and pollution in the area just make it worse.

292. John Kimpton (ZIP code: [REDACTED])

If it bypassed Mottram and went around Tintwistle and then joined up with the Woodhead road, I could see the sense in it, but not as it is presented at present.

J. Kimpton.

293. Ruth Potheary (ZIP code: [REDACTED])

New roads always create more traffic. Invest in sustainable environmentally friendly public transport public. This proposal is not fit for purpose and will increase traffic and air pollution in many areas.

294. John Pasiecznik (ZIP code: [REDACTED])

295. John Beardmore (ZIP code: [REDACTED])

296. john brougham (ZIP code: [REDACTED])

BAN ANY VEHICLE OVER 3.5 TON FROM USING THE A628 AND DONT BUILD THIS PROPOSED BY PASS.

297. John LeGrove (ZIP code: [REDACTED])

Experience shows that building new roads and by-passes only serves to increase road traffic. Within a few years, the areas by-passed become as busy as they were before the roads were built. Instead, we should turn our attention to avoiding road use in the first place.

298. John Musker (ZIP code: [REDACTED])

299. Jonathan Frankham (ZIP code: [REDACTED])

The scheme does not appear to reduce congestion or pollution and will put more cars on the road, making the a57 even more dangerous fir cyclists, pedestrians, and children in particular as it is a walking route for many local schools.

Please look at investing the money in more sustainable and effective ways.

300. Jon Buckley (ZIP code: [REDACTED])

The only area to benefit from this would be Hyde road, congestion would still occur in other areas. It has not been thought out properly and has changed numerous times due to cost. It is a half hearted attempt at solving a huge problem, only to lead to other problems down the line.

301. Joanna Neville (ZIP code: [REDACTED])

302. An anonymous signer (ZIP code: [REDACTED])

303. Jude Whitehead (ZIP code: [REDACTED])

A by pass will only attract more traffic not less and so I oppose this fruitless waste of money and would rather see greener alternatives.

304. Judith Shaw (ZIP code: [REDACTED])

305. Julia Thorburn (ZIP code: [REDACTED])

306. Julie Greengrass (ZIP code: [REDACTED])

Glossop can't handle more traffic along the A57. The perception of the bypass was that it would also bypass Glossop. The proposed development does the complete opposite of that

307. Julie Higginbottom (ZIP code: [REDACTED])

This scheme will NOT reduce the volume of traffic on the A628 and may actually increase volume. It currently takes me 20 mins to reach my daughters house, which is actually just a 5 minute drive away from my house.

The high cost of this work does not justify the minimal difference it is going to make to the residents of this area.

This scheme should be scrapped.

308. Julie Lainton (ZIP code: [REDACTED])

309. Julie Walker (ZIP code: [REDACTED])

I used to live near here and know how devastating an effect this proposal will have in the local environment and local residents if it is allowed to go through and therefore I am totally against it.

310. June Leachman (ZIP code: [REDACTED])

I oppose the bypass.

311. Justine Goddard (ZIP code: [REDACTED])

The current proposal will not ease the traffic congestion

312. John Stafford (ZIP code: [REDACTED])

This scheme will make the situation in Hollingworth even worse than it is already and cause massive disruption during its construction to no positive outcome

313. Kate Howell (ZIP code: [REDACTED])

314. Knight Andrew (ZIP code: [REDACTED])

315. Kamie Stacey (ZIP code: [REDACTED])

316. Karen Smith (ZIP code: [REDACTED])

This scheme will cause more traffic and more pollution for most people in this area. This is not the solution, particularly as we are in a climate crisis.

317. Kate Singleton (ZIP code: [REDACTED])

318. Kate Campbell-Green (ZIP code: [REDACTED])

319. Katherine Shaw (ZIP code: [REDACTED])

The original bypass plans to help the villages I was for. But this new road that is being planned will help nobody and in fact will make the issue worse as the residents of Mottram end up with another busy road around them that serves no benefit to the local communities. This would be a gross waste of tax payers money in its current form.

320. Katie Fielding (ZIP code: [REDACTED])

321. Kayley Davies (ZIP code: [REDACTED])

322. Katie Buckley (ZIP code: [REDACTED])

As a Mottram resident, we see no benefit to the scheme. The traffic will still be as bad around the local area. The original plan of taking the bypass to the Woodhead would have been far more productive for all residents in both Tameside and Derbyshire. A lot of money being spent on something that won't achieve a great deal! Plus it will increase light and air pollution. Another great decision made by those in power!

323. Keira Edmondson (ZIP code: [REDACTED])

The link road proposal neither provides a solution to the traffic congestion issues in Glossop, nor value for money nor any contribution to climate action. Please reject

324. Jeffrey Bickerton (ZIP code: [REDACTED])

325. Kim Barrett (ZIP code: [REDACTED])

326. Kimberley Jordan (ZIP code: [REDACTED])

More traffic would make my three different school drop offs and pick ups impossible!

Working single Mother of 3; [REDACTED]

327. Kim Jones (ZIP code: [REDACTED])

328. Lesley Ward (ZIP code: [REDACTED])

329. Laura Webster (ZIP [REDACTED])

330. Laura Blake (ZIP code: [REDACTED])

More roads mean more traffic. More traffic means more congestion and pollution. More roads means more loss of land and biodiversity that needs saving and protecting. We are living in a time of climate emergency. The road building has to STOP NOW.

331. Leanne Robinson (ZIP code: [REDACTED])

332. Lee Price (ZIP code: [REDACTED])

It's not a bypass, it will make local traffic worse.

333. Lee Spinks (ZIP code: [REDACTED])

334. Helen Papaleloudi-Crofts (ZIP [REDACTED])

I live on Market St Hollingworth. The noise, the fumes, the shaking of the house every time lorries pass are unbearable. When I bought the house and moved here, a countdown was given towards the BYPASS. What they propose is not a bypass. Millions will be wasted to make the situation worse.

335. sara Scott-Rivers (ZIP code: [REDACTED])
Tintwistle needs a break from huge lorries!!

336. Les Richardson (ZIP code: [REDACTED])

337. Lesley Anderson (ZIP code: [REDACTED])

338. Steve Lester (ZIP code: [REDACTED])

339. Lorna McGlinchey (ZIP code: [REDACTED])

340. Liam Turner (ZIP code: [REDACTED])

341. Liezl Bruwer (ZIP code: [REDACTED])

342. Linda Roberts (ZIP code: [REDACTED])

We should be reducing traffic and congestion in Glossop. This development will increase pollution. The climate crisis is not being taken seriously by our MP.

343. Linda Walker (ZIP code: [REDACTED])

344. Lindsay Allott (ZIP code: [REDACTED])

345. Lisa Hopkinson (ZIP code: [REDACTED])

This scheme flies in the face of all the evidence that building new roads creates more carbon and congestion in the long run and the £180 million will be better spent on improved public transport and cycle routes which reduce traffic and improve travel options, as well as reduce carbon, air pollution and congestion.

346. Liz Elliott (ZIP code: [REDACTED])

We have a climate crisis building new roads will not help this at all. We must reduce car usage not increase it

347. Liz Pasteur (ZIP code: [REDACTED])

348. Elizabeth Holmes (ZIP code: [REDACTED])

349. Elizabeth Jack (ZIP code: [REDACTED])

Please reconsider the impact this will have on local families who will lose their homes.

350. Laura Stevens (ZIP code: [REDACTED])

351. Lorna Sumption (ZIP code: [REDACTED])

352. Louise Slinger (ZIP code: [REDACTED])

353. Louisa Wilson (ZIP code: [REDACTED])

I would prefer money to be invested in better public transport to and from Glossop. The cycle network to Manchester is appalling. The trains are over crowded and the buses too few.

354. Louisa Briggs (ZIP code: [REDACTED])

355. Louise Victoria (ZIP code: [REDACTED])

356. Lucy Burns (ZIP code: [REDACTED])

357. Luke Sanderson (ZIP code: [REDACTED])

358. Lydia Pasiecznik (ZIP code: [REDACTED])

359. Lynn Bowker (ZIP code: [REDACTED])

360. LYNNE BOARDMAN (ZIP code: [REDACTED])

361. lynn Thwaites (ZIP code: [REDACTED])

362. Michael Corcoran (ZIP code: [REDACTED])

Instead of making what are usually futile attempts to reduce journey times for car drivers commuting to and from Manchester, thinking should instead focus on how to reduce the number of commuters that choose that mode of transport. This includes making sensible planning decisions on new housing infrastructure developments in and around Glossop. Priority should be given to meeting local demographic needs rather than just regarding the town as a satellite of Greater Manchester.

363. Mary Reape (ZIP code: [REDACTED])

364. James Macintosh (ZIP code: [REDACTED])

I live locally and understand the desire for the bypass through to Glossop. Local roads are not designed to managed the types and amount of vechiles they have on them.

Having read through the alternative proposed I would much prefer some major investment such as planned however I do think it should go further to more local people out of there cars

I commute into Manchester as a lot of people do from the area. If you work near piccadilly the train is fine but if you need to get anywhere else driving is the only option due to just how lacking local public transit is and therefore a lot of work is needed with TfGM to really sort this properly. A rail corridor to stockports new intertage. Transport intergation into Metrolink trams and buses into Ashton, Hyde, Denton and stockport after you get of the train at Station down the rail corridor or straight from Glossop itself would go a long way if planned together properly. Not to mention the lack of decent frequent and late running connections to the rest of our peak district neighbours.

Therefore I support this proposal but encourage further planning in order to really sway local people that is is a good idea and make Glossopdale the best place it can be.

365. Malcolm Maddock (ZIP code: [REDACTED])

I have lived in Glossop 39 years, the only difference this road will make is a change of view while sitting in a queue.

The road bypasses nothing.

366. Margo McKenna (ZIP code: [REDACTED])

The Snake Pass is one of the most beautiful winding trails in England, is dangerous to heavy traffic, and is very often closed to traffic altogether in winter conditions and when serious accidents occur. This ridiculous plan would ruin the beauty of the Snake Pass and turn it into a death trap, would be toxic to Glossop High Street and to Glossop residents and driving through the High Street and the Pass would be both frustrating and dangerous for heavy traffic.

367. Michael Hirst (ZIP code: [REDACTED])

368. Sue Maher (ZIP code: [REDACTED])

369. Deborah Boland (ZIP code: [REDACTED])

Why not trial a weight limit on Woodhead A628.

This link Road proposal does absolutely nothing to improve the situation on Mottram Moor. A628 and A57.

It literally dumps all the traffic on Mottram Moor and Brookfield, how is that any different than now, other than missing out Woolley Bridge.

370. Mandy Cornwall (ZIP code: [REDACTED])

I think a link road (what happened to Bypass?) would be in detriment to the green areas around Mottram. I also can't see where all the lorries will go. Surely there will just be queues at the new junction.

371. Amanda McGlinchey (ZIP code: [REDACTED])

Please stop this useless bypass. It will only cause more disruption and traffic queues to the centre of the town

372. Margaret Taylor (ZIP code: [REDACTED])

373. Marie-Claudine Viollet (ZIP code: [REDACTED])

374. Mark Gleeson (ZIP code: [REDACTED])

375. MARK JESSOP (ZIP code: [REDACTED])

376. Mark Robinson (ZIP code: [REDACTED])

377. E Coombes (ZIP code: [REDACTED])

378. Martin Petch (ZIP code: [REDACTED])

We can't continue covering the country in tarmac and concrete. We need to start thinking sustainably

379. Margaret Martin (ZIP code: [REDACTED])

380. mary Bouchier (ZIP code: [REDACTED])

381. Mary Fitton (ZIP code: [REDACTED])

382. Mary Moss (ZIP code: [REDACTED])

383. Parus Shah (ZIP code: [REDACTED])

384. Matthew Law (ZIP code: [REDACTED])

385. Maxine Nattle (ZIP code: [REDACTED])

386. Maximilian MacDonald (ZIP code: [REDACTED])

387. Phil Sturgeon (ZIP code: [REDACTED])

if our trains and buses are being defunded over "changes in travel patterns" let's stop building out giant roads too. The climate crisis is not going away.

388. Melanie Brierley (ZIP code: [REDACTED])

Not fit for purpose. Does not alleviate the volume of traffic through the villages of Hollingsworth and Tintwistle. Will cause more backlog and waiting on the Moor.

389. melvyn matthews (ZIP code: [REDACTED])

The whole Idea is riddled with problems, and at an enormous cost just to move a problem 2miles up the road

Its not been thought out properly

390. Melanie O'Brien (ZIP code: [REDACTED])

This scheme will only make traffic worse in our area. The money should be used to improve cycle networks, public transport links and our once excellent rail service which has become a joke since we came out of the pandemic. We should be looking at green alternatives wherever there is call for a new road. New roads only create more traffic.

391. Melissa Gardener (ZIP code: [REDACTED])

This is not a bypass and will significantly increase traffic through Glossop, a town already at breaking point with congestion. A solution is required, this is not it.

392. Melvyn Roberts (ZIP code: [REDACTED])

Lorry Ban on A628 IMO in combination with better bus services and railway station at Gamesley would obviate necessity for ANY additional roads. We are subsidising big business/HGV with our health. Make lorries go long way round on motorways or put their freight on the railway. Don't let them

put any extra costs on prices. Remove Tory government who accept bribes from these polluters.

393. Michelle Biesty (ZIP code: [REDACTED])

This would be a complete waste of time and money as it elevates nothing

394. Michaela Bromley (ZIP code: [REDACTED])

Strongly against this scheme it may affect my mums house it is a waste of money only moving traffic from one place to another we all know solution is to ban the hgvs they should go on m62 reopen woodhead line and put freight on it move forwards not backwards will make traffic worse is completely destroying mottram

395. Michelle Parker (ZIP code: [REDACTED])

This proposal is madness. Utter waste of time and money

396. Michael Conway (ZIP code: [REDACTED])

I would not like this road to go ahead as we need to focus on reducing the number of cars on the road and investing in more ways to encourage walking and cycling - as well as strongly supporting our buses and trains - the climate emergency is here and now and this road building is not necessary - thank you.

397. Michael Conway (ZIP code: [REDACTED])

This new road will create more traffic, more pollution and above all increase carbon emissions at a period in history where the planet simply can't take any more. We need to be moving in the opposite direction, encouraging greater use of public transport and getting people out of cars. Please do not go ahead with this proposed road.

398. Michael Foster (ZIP code: [REDACTED])

399. Mike Stansfield (ZIP code: [REDACTED])

A pointless exercise and waste of money that will only increase traffic in the villages the original bypass was supposed to protect. The bypass needs to bypass Mottram, Hollingworth and Tintwistle before being effective

400. Michelle Baines (ZIP code: [REDACTED])

401. Michelle Lees (ZIP code: [REDACTED])

402. Mick Ryan (ZIP code: [REDACTED])

403. Mick Reigate (ZIP code: [REDACTED])

Trains not cars

404. Mike Watson (ZIP code: [REDACTED])

405. Michael Taylor (ZIP code: [REDACTED])

406. Halina Billingham (ZIP code: [REDACTED])

407. Michael Brueck (ZIP code: [REDACTED])

Road schemes such as that proposed for Glossop are very tempting for people suffering serious road congestion in town centres. However they often only displace busy traffic to other local roads as has happened in the case of the Manchester Airport Relief Road (often more congested than before on A6 through High Lane).

That aside, there would be a huge negative impact re climate change (building of the road and additional traffic on it).

We should be investing our road transport resources in much improved bus services.

408. Margaret Manning (ZIP [REDACTED])

409. Lesley Allen (ZIP code: [REDACTED])

The A57 link Road will do nothing but attract more HGVs off the M1. Please use the money to improve public transport instead

410. David Moore (ZIP code: [REDACTED])

411. Liam WARD (ZIP code: [REDACTED])

We don't need traffic-inducement schemes that conflict with the UK's Net Zero priorities, we need actually integrated transport solutions to reduce traffic and get people moving differently.

412. David Moore (ZIP [REDACTED])

413. Sam Alder (ZIP code: [REDACTED])

414. Francis Murphy (ZIP code: [REDACTED])

415. Michael Webb (ZIP code: [REDACTED])

This a white elephant . It does nothing for the relief of Hollingworth and Tintwhistle where residents continue to suffer from massive congestion and air pollution. Go and have a look yourself.

416. Deanna Lees (ZIP code: [REDACTED])

Common sense got to be trial the weight limit for 2/3 months
They've never done that

417. Natasha Marsden (ZIP code: [REDACTED])

The new proposed A57 bypass is a waste of money & will do nothing to ease traffic congestion. It needs to bypass Glossop completely & make it direct to the M1 at Sheffield.

Via Glossop does nothing.

418. Neil Elkins (ZIP [REDACTED])

419. Neil Lambert (ZIP code: [REDACTED])

420. Neil Mitchell (ZIP code: [REDACTED])

421. Neil Clarkson (ZIP code: [REDACTED])

422. Christine Crossley (ZIP code: [REDACTED])

I can see nothing in the proposal that will help alleviate the congestion in and around Glossop. The proposal does not appear to be a 'by pass', just an alternative route for traffic at a ridiculous cost. A by pass needs to be just that. Glossop's only notability locally appears to be its its congestion and with more planned housing there does not seem to be any solution to the problem. Please do not allow this route to happen. Thank you.

423. Jen Beckett (ZIP code: [REDACTED])

424. Jeannette Huddart (ZIP code: [REDACTED])

425. Neville Buckley (ZIP code: [REDACTED])

426. Natalie Rusholme (ZIP code: [REDACTED])

absolutely disgusting to even think about building this road

427. Nicholas Granville (ZIP code: [REDACTED])

428. DR NICK LONGOS (ZIP code: Sk [REDACTED])
STOP THE [REDACTED] ROAD, INNIT?

Regards,
Dr Nick

Practise random kindness and senseless acts of beauty; carpe diem
??__August 2022?

429. Nick Rider (ZIP code: [REDACTED])

430. Nick Beddow (ZIP code: [REDACTED])

431. Nicola Bowler (ZIP code: [REDACTED])

432. Nicolle Bairsto (ZIP code: [REDACTED])

These proposed link roads will increase traffic in glossop which is already horrendous - even outside of rush hour. We need a bypass that will decrease air pollution and accidents for Glossop, Tintwistle & Hollingworth and make quality of life better for residents.

This bypass of Glossop, Tintwistle and Hollingworth has been requested for almost 50 years and the ever-increasing population does not have the infrastructure now to support additional traffic.

433. Nigel Harvey (ZIP code: [REDACTED])

434. Noah Ryan (ZIP code: [REDACTED])

435. Norma Evans (ZIP code: [REDACTED])

436. Norman Cavanagh (ZIP code: [REDACTED])

Total waste of public money and does not tackle the basic problem of the A628 through Tintwistle and Hollingworth

437. Neil Best (ZIP code: [REDACTED])

This appalling I'll thought through scheme will worsen an already dreadful traffic bottle neck. Please reconsider a full by pass ow.

438. Owen Pugh (ZIP code: [REDACTED])

This scheme is a total white elephant. I don't believe it will deliver on its promises, merely a feather in the cap of local MPs to want to have "delivered bypass" on their CVs!

439. Linda Masters (ZIP code: [REDACTED])

440. Mick Owen (ZIP code: [REDACTED])

441. Julie Standeven (ZIP code: [REDACTED])

The proposed A57 link Road is a complete waist of money and time. The original plans to stop the Mottram traffic chaos, was to do a dual carriageway all the way up woodhead, now we have plans for a little snippet of the original and instead of relieving the traffic problem, will cause more chaos during the construction and once finished will just move the congestion a little further along the A57/A628. What we need to do is put a weight restriction on these 2 roads and send all the heavy traffic over the M1/M62, lessening the congestion in Glossop, Mottram, Hollingworth and Tintwistle and reducing the emissions and noise pollution in these villages.

442. Pat Hetherington (ZIP code: [REDACTED])

This will not solve trffic problems but increase tthem with yet more housing.

443. Peter Robinson (ZIP code: [REDACTED])

Any sheme that will increase traffic on the already dangerous A57 Snake Pass is absurd. Why spend millions to make things worse.

444. Patrick Sharpe (ZIP code: [REDACTED])

I believe that the allocated money should be better spend integrating and improving low carbon public transport links, and improving cycle and footpath routes

445. Pietro Alen (ZIP code: [REDACTED])

I am not convinced that a new by pass will resolve the issues.
Investment in public transport availability and affordable fares should be trialled first.

446. Pamela Stokes (ZIP code: [REDACTED])

447. Pamela Valley (ZIP code: [REDACTED])

The proposed by pass has well by passed its sell by date.

448. Pam Witty (ZIP code: [REDACTED])

I believe this scheme will increase the volume of traffic, so in the end, this area will not be better off, but worse - for residents and commuters alike.

Why not improve the infrastructure? I think that is the key, as it is very poor currently.

449. Sandra Parkin (ZIP code: [REDACTED])

Total waste of time and money. Will not help Glossop with traffic problems. Please don't build this and cause up to 3 years, stress and misery for road users while building continues.

450. Patricia Bennett (ZIP code: [REDACTED])

451. Patricia Gray (ZIP code: [REDACTED])

452. Pat Pasiecznik (ZIP code: [REDACTED])

453. Patricia Gardner (ZIP code: [REDACTED])

454. Patricia Bairsto (ZIP code: [REDACTED])

The original Bypass would have taken heavy traffic and fumes away from the area. The A57 link will just redirect the traffic and make it easier for heavy vehicles and fumes access the inner areas, putting more pressure on roads, congestion, accidents, leading to more carbon. We need this traffic to completely BYPASS. 50 years is a long time to wait. Instead we had a motorway making it easier to access and now another addition to ease access. I suggest the people who plan should come and live with this for some time instead of snapshot visits.

455. Patrick Anderson (ZIP code: [REDACTED])

456. Paula Rabone (ZIP code: [REDACTED])

457. Paul Clough (ZIP code: [REDACTED])

458. Paul Heppleston (ZIP code: [REDACTED])

Not in my name do you continue with these road plans...

459. Pauline Bell (ZIP code: [REDACTED])

The proposed link road, if built, will actually increase congestion and pollution in Tintwistle and

Glossop.

460. Chris Peers (ZIP code: [REDACTED])

They took all the trees, put 'em in a tree museum / And they charged the people a dollar and a half just to see 'em

Which part of 'climate emergency' does the government not understand?

461. Pennyaeaassaaad Saunders (ZIP code: [REDACTED])

462. Penny Took (ZIP code: [REDACTED])

463. Peter Rozhin (ZIP code: [REDACTED])

Disgraceful cheap design

Create huge problems

Beyond belief that you are even considering this scheme

464. Brenda Ashworth (ZIP code: [REDACTED])

A complete waste of time and money, it won't help Tintwistle/hadfield at all. Bet it's not local people who have decided this ?

465. Peter Hankinson (ZIP code: [REDACTED])

The Scheme should not attract more traffic and especially HGVs using the Woodhead Pass as an alternative to the M62. We need a better road infrastructure that will benefit the local community.

466. Peter Allen (ZIP code: [REDACTED])

467. Peter Crook (ZIP code: [REDACTED])

468. Peter Grice (ZIP code: [REDACTED])

Waste of alot of money. Will not solve anything.

469. Peter Pike (ZIP code: [REDACTED])

470. Pat Dodd (ZIP code: [REDACTED])

471. Phil Copeland (ZIP code: [REDACTED])

Not what was promised!

472. Philip Else (ZIP code: [REDACTED])

473. Philip Ward (ZIP code: [REDACTED])

Please do not move the problem from one area to another at huge expense when tha t money is very much needed fir other social issues. Also we have a unique and diverse wild life in our area including wild deer, the area of mottram is predominantly farm land and provides a living for a lot of the local

residents. It is semi rural and a pleasure to live in, please do not destroy the peace and quiet and ruin the clean air we love to enjoy living here. Alternatively you could ban the heavy goods vehicles from our routes which would alleviate the traffic issues straightvaway without the incurred costs, improve the areas with the issue whilst protecting the unspoilt beautiful areas we live in. Thankbyou for your time and consideration.

474. Phyllis Myers (ZIP code: [REDACTED])

475. patricia irwin (ZIP code: [REDACTED])

476. Mike Pinder (ZIP code: [REDACTED])

477. Matt Pollard (ZIP code: [REDACTED])

All the modelling shows an increase in traffic at the three ends of the bypass with the only real reductions being in the centre of mottram as the road takes all the traffic. We should be looking at ways to reduce car use, not bring more traffic in.

478. Poppy Simon (ZIP code: [REDACTED])

479. Heather Lawrence (ZIP code: [REDACTED])

Save the homes

480. Paula Worrall (ZIP code: [REDACTED])

481. Rosemary Thornton (ZIP code: [REDACTED])

The construction of this road will cause major disruption with no benefit.

There should be major investment in a motorway which links Manchester and Sheffield. That would relieve congestion!!

482. Roni Smith (ZIP code: [REDACTED])

483. K Relton (ZIP code: [REDACTED])

484. Ian Beever (ZIP code: [REDACTED])

I have already communicated my concerns about this road scheme to Robert Largan MP in 2020. It is an outdated proposal that does not account for the problems we are facing today. £180M+ could be spent far more effectively on transport in our area with greater outcomes for businesses, individuals and the local economy.

485. Richard Leyshon (ZIP code: [REDACTED])

486. Richard Leyshon (ZIP code: [REDACTED])

487. Richard Bowden (ZIP code: [REDACTED])

A Glossop Link road would only bring more traffic into the area and cause serious congestion and

Pollution Problems. The A57 through Glossop will be unable to cope with this extra traffic. Many of the roads in the area already have congestion problems, it will cause more trucks to use the A57 to get to Sheffield or Manchester, this will cause damage to the roads and verges.

We are already dealing with Subsidence on the Snake pass near Alport Bridge on the A57. Large HGV'S regularly crash on the Snake pass in the winter causing damage to the roads and associated moorland. The area is in the Peak National park and trucks are causing damage to this area. The roads in Glossop weren't built to take 44 ton trucks or heavy traffic, a Glossop spur road would only encourage Trucks and more traffic to cut through Glossop causing even more traffic problems to the area.

488. Richard Hart (ZIP code: [REDACTED])

489. Richard Smith (ZIP code: [REDACTED])

490. Rick Seccombe (ZIP code: [REDACTED])

491. Robert Burns (ZIP code: [REDACTED])

492. Rob Coyle (ZIP code: [REDACTED])
We need traffic reduction NOT more traffic.

493. Robert Jones (ZIP code: [REDACTED])

494. Robin battersby (ZIP [REDACTED])
This will only make access to glossop easier meaning more people wanting to live in glossop, creating more traffic, and a vicious circle of more people and more traffic. We simply don't want it.

495. Robert Wakeling (ZIP [REDACTED])
We don't need more roads. We need road charging to reduce congestion and subsidised public transport.

496. Robyn Hodgetts-Haley (ZIP code: [REDACTED])

497. Roderick Gray (ZIP code: [REDACTED])
This scheme will do nothing to relieve the congestion through Hollingworth, Tintwistle and Glossop, but will probably make congestion a lot worse. Better public transport and get freight back on the railway network.

498. Roger Walton (ZIP [REDACTED])

499. Diana Virgo (ZIP code: [REDACTED])
Current proposal not fit for purpose. A57 through Glossop town centre still gridlocked with unacceptable pollution.

500. Helen Burton (ZIP code: [REDACTED])

501. Rosalind Gilberthorpe (ZIP code: [REDACTED])

502. Rosie Howell (ZIP code: [REDACTED])

The recent road works saw lorries not use the road the traffic despite the lane reduction was much better. Please get the lorries off the roads.

503. Valerie Rowlinson (ZIP code: [REDACTED])

504. Mat Padley (ZIP code: [REDACTED])

The government will generally do what they want unfortunately

505. Russell Howell (ZIP code: [REDACTED])

Put the majority of freight back on the rails with regional distribution centres

506. Ruth Brown (ZIP code: [REDACTED])

We live on. Old Hall Lane

The money spent on this ridiculous proposal should be redirected to the NHS.

507. Ruth Brown (ZIP code: [REDACTED])

508. Ruth Elder (ZIP code: [REDACTED])

509. Sarah Gabriel (ZIP code: [REDACTED])

510. Stephanie Gabbitus (ZIP code: [REDACTED])

511. Stephen Yorke (ZIP code: [REDACTED])

512. Dstephen Yorke (ZIP code: [REDACTED])

513. Richard Graham (ZIP code: [REDACTED])

514. Sally Drake (ZIP code: [REDACTED])

515. Sam Edwards (ZIP code: [REDACTED])

This route will not solve or improve the issues

516. Sam Riddle (ZIP code: [REDACTED])

517. Samantha Cowell (ZIP code: [REDACTED])

518. Sam Parker (ZIP code: [REDACTED])

519. Sarah Burgess (ZIP code: [REDACTED])

520. Sarah Grantham (ZIP code: [REDACTED])

This scheme is simply madness at a time when we should be looking to reduce the number of cars and vehicles on the road. Many of the vehicles are lorries which should be using the motorway networks of the M1, M62 and M60 to travel rather than try to cut through a completely unsuitable road.

521. Sarah Willett (ZIP code: [REDACTED])

522. Sarah Bagshaw (ZIP code: [REDACTED])

523. Shula Rouse (ZIP [REDACTED])

STOP all HGV 's using Glossop as a cut through to snake pass.
Our little roads should be used for local traffic only.

524. Susan Dent Tasker (ZIP code: [REDACTED])

525. Simon Holmes (ZIP code: [REDACTED])

This money wasting vanity project by Robert Langan will simply move the problem NOT solve it.

526. Sean Ofsarnie (ZIP code: [REDACTED])

A weight restriction would be a much better option.

527. Selena Hinds (ZIP code: [REDACTED])

528. Selena Greaves (ZIP [REDACTED])

I moved out of Glossop in the late 90's because the traffic and public transport was bad then and it was never going to get better. People who moved there knowing full well how bad the traffic is shouldn't be allowed to complain, after all I bet they all have cars and use them to drive a mile down the road. I have 2 horses and I have to travel on 6 buses most days because the only 24/7 grazing near me is out of my price range. We need fields, wildlife, country side, clean air more than they need a new road. Maybe if some of them walked once in a while the traffic wouldn't be that bad.

529. Sharon Oliver (ZIP code: [REDACTED])

530. Sharon Youngson- Baines (ZIP code: [REDACTED])

This is not the bypass we need, it is a very expensive pretend bypass.

531. Sharon Booth (ZIP code: [REDACTED])

The planned spur road will not ease traffic congestion and from proposals looks to be a way of getting approval for more houses

532. Sheila Evans (ZIP code: [REDACTED])

533. Sian Pinkerton (ZIP code: [REDACTED])

534. Simon Porter (ZIP code: [REDACTED])

535. Simon Hogg (ZIP code: [REDACTED])

536. Keith Simpson (ZIP code: [REDACTED])

Complete waste of taxpayers money.

Stop heavy lorries on A628 and Snake Pass - problem solved !

537. Hayley Simpson (ZIP code: [REDACTED])

538. Penny Wilson (ZIP code: [REDACTED])

539. Jackie Goodwin (ZIP code: [REDACTED])

540. Stephen Croft (ZIP code: [REDACTED])

The current scheme does not alleviate traffic issues through the area, it just moves elements of it up the road

541. Stuart Smith (ZIP code: [REDACTED])

542. Shirley Milligan (ZIP code: [REDACTED])

543. Shirley Milligan (ZIP code: [REDACTED])

544. Wendy Smith (ZIP [REDACTED])

545. Sophia Downing (ZIP code: [REDACTED])

546. Spence Jones (ZIP code: [REDACTED])

An utter waste of money.

No congestion alleviated from surrounding areas Glossop, Dinting, Hollingworth and Tintwhistle.

547. Steve Baker (ZIP code: [REDACTED])

There should be a weight restriction on the A57 & A628 perhaps 7.5 tonne max or less , this would ease the traffic nightmare

548. Stella Corral (ZIP code: [REDACTED])

Please action long term solutions for Longdendale and Glossop traffic like weight restrictions, cycleways and public transport not throw stupid amounts of money on one link road that is not going to be a solution!!!

549. Steve Hughson (ZIP code: [REDACTED])

550. Stephen Thornton (ZIP code: [REDACTED])

551. Steve Orridge (ZIP code: [REDACTED])

552. Rachel Storr (ZIP code: [REDACTED])

The proposed bypass does not solve the issue of heavy traffic adding through Hollingsworth and tintwistle. It will simply move the lane of traffic to glossop onto a separate lane, taking up green space for no effect. The problem needs a full solution - a complete bypass of the whole section between mottram and tintwistle.

553. Stuart Goodrick (ZIP code: [REDACTED])

554. Susan Peat (ZIP code: [REDACTED])

555. Sue Bangs (ZIP code: [REDACTED])

556. Susan Cooper (ZIP code: [REDACTED])

557. Susan Hartley (ZIP code: [REDACTED])

The A57 link road only reduces traffic at mottram

558. Susan Bean (ZIP code: [REDACTED])

559. Anne Sumner (ZIP code: [REDACTED])

560. Sue Davies (ZIP code: [REDACTED])

The new bypass won't solve anything. It will simply just move the traffic about half a mile to the east. Destroying wildlife & people's homes.

So many other solutions.

What's worse is that they already know this but because its ££££ in someone's pocket they will say anything to get the plans passed..

561. Susan Grantham (ZIP code: [REDACTED])

It is scandalous that the proposal has been rejected, when it has been promised for so many years and is certainly needed

562. Suzanne Bailey (ZIP code: [REDACTED])

This new road will do nothing to ease traffic through Hollingworth and Tintwistle. It does not create the quickest route to Glossop from the A57 and cuts a pointless swathe through open countryside. It will also merely relocate the queue going into Glossop not eradicate or reduce it. The easiest and most economic way to reduce congestion and traffic through these villages would be to put a weight limit on the A628. This will force HGVs to use the M62.

563. Tina Brown (ZIP code: [REDACTED])

The proposed link Road is in the wrong place. It needs to be further up in hollingworth. This section will achieve nothing and is destroying much needed green space.

564. andrew porter (ZIP code: [REDACTED])

this is a complete waste of money ,a short bypass only to mottram moor will not help hold ups

565. Toni hill (ZIP code: [REDACTED])

You would be taking away our lives our home and my business! You will be destroying a family! a business built from scratch! Our little boys home! A whole family and our built lives and bonds made within our community my boy will be starting his school life in mottram from September and if we have to move his whole world and ours would be flipped upside down! We have been dealing with the stress of this prospect for 5 years now and it's destroying us!

566. Nigel Bennett (ZIP code: [REDACTED])

567. Terry Arthur (ZIP code: [REDACTED])

568. Tony Gloster (ZIP [REDACTED])

569. Thanassis Frank (ZIP code: [REDACTED])

570. M S Jones (ZIP code: [REDACTED])

The destruction in the building of this pointless road is completely unjustified. It will bring no congestion relief, it will only make it worse and destroy massive areas of irreplaceable natural habitat. A weight restriction on the Snake Pass should have been put in place decades ago to keep heavy goods vehicles on the already existing motorway network. Our world and particularly the UK is suffering enough without destroying even more of it. STOP THIS NOW!

571. Shirley Thomas (ZIP [REDACTED])

We cannot afford to lose more green space for roadbuilding in an ecological emergency. Instead of roadbuilding, encourage people out of cars with good integrated public transport.

572. Tim Mottershead (ZIP [REDACTED])

573. Tina Robertson (ZIP code: [REDACTED])

This doesn't solve the traffic problem it just diverts some of it. What happened to the agreement to have the by pass that a certain Mr Largan was so pleased with himself about.

574. Tom Brennan (ZIP code: [REDACTED])

575. Tom Grantham (ZIP [REDACTED])

576. Joanne Vaughan (ZIP code: [REDACTED])

The by pass is no answer to the traffic problem only moving it up the road

577. Tracey Elder (ZIP code: [REDACTED])

578. Tracy Welford (ZIP code: [REDACTED])

579. patricia Barnes (ZIP code: [REDACTED])

The proposed A57 link road will not alleviate the congestion in the longdendale valley nor will make the access to Glossop any easier, this is exacerbated by the excessive amount of "unaffordable homes" (not attainable for local people) that have been built making it a satellite town for Manchester.

580. Tim Budd (ZIP code: [REDACTED])

Please listen. This is going to be a colossal waste of money, for literally no gain in any way whatsoever.

The proposals *show* there will be an increase in traffic through the towns- there is simply no upside to it whatsoever (except, perhaps to say that you're doing something... when that something is worse than useless).

581. Usha Deulkar (ZIP code: [REDACTED])

582. Sandra Cooper (ZIP code: [REDACTED])

583. Valerie wilhelm (ZIP code: [REDACTED])

Better idea is to give better public services. Work on this route will be disastrous for people going to work, the residents along the route, more traffic coming into the area, and it will become a concrete jungle. Stop large lorries blocking the route which is one of the biggest and most polluting issues in the area.

584. Vivienne Clements (ZIP code: [REDACTED])

Having viewed the supporting information I object to the A57 link as it will not resolve any traffic issues in Glossop, in fact it will exacerbate them. The route chosen will only bypass a small stretch of road providing a faster route for trans-Pennine HGV traffic to travel through Glossop town centre. I agree with the bypass solution but it needs to bypass Hollingworth and Tintwistle to achieve the desired outcomes.

585. Victoria Robson (ZIP code: [REDACTED])

This proposal is NOT going to alleviate the constant traffic problems getting in & out of Glossop.

586. Victoria Dearnley (ZIP code: [REDACTED])

587. Victoria Wilde (ZIP code: [REDACTED])

588. Vikki Hanley (ZIP code: [REDACTED])

589. Wendy Bullar (ZIP code: [REDACTED])

590. David Walklate (ZIP code: [REDACTED])

Dear Secretary Of State For Transport,

The proposed scheme will be beneficial to only a small percentage of the residents of Mottram, the majority of Mottram and the whole of Longdendale will suffer more disruption during construction and

will see little, if any, improvement after completion.

The money necessary to complete the proposed scheme would be much better spent on a trans Pennine rail link for freight, this would remove a large part of the polluting traffic that clog our roads. Alternatively put a weight restriction on the A628 road and spend the money improving the M62 motorway.

Regards,

David Walklate

591. Wayne Czartowski (ZIP code: [REDACTED])

592. Wayne Large (ZIP code: [REDACTED])

Pave paradise to put up a parking lot?

No thanks.

Why do people move to the countryside, then complain about lack of roads and want the countryside paving to accommodate them?

NUTTERS

593. Wendy Smith (ZIP code: [REDACTED])

594. Emily Whaites (ZIP code: [REDACTED])

595. Stella Whalley (ZIP [REDACTED])

596. neil wheatley (ZIP code: [REDACTED])

hello

total waste of money! you should spend it on reopening the rail link to sheffield through woodhead!

neil:-)

597. Karen Taylor (ZIP code: [REDACTED])

The plans will not ease traffic in Mottram and create a bottle neck in glossop

598. Alan Wilson (ZIP code: [REDACTED])

An absolute waste of time and money only create more congestion, no thought gone into the plan will only create more congestion.

599. Ken Wilde (ZIP code: [REDACTED])

600. William Hey (ZIP code: [REDACTED])

The proposed A57 link roads represent another disappointing and half-solution infrastructure project which has become a specialism of the last decade of governments. Better no change than an expensive and ineffective one. I urge the SoS for Transport to implement long term, holistic solutions rather than plastering over the cracks of our ageing transport infrastructure which is no longer fit for purpose.

601. Alison Jackson (ZIP code: [REDACTED])

602. Peter Wilson (ZIP code: [REDACTED])

A lot of expense and disruption just to move the traffic elsewhere with the same result i.e. slow and standing traffic because two fast lanes won't go into one slow lane.

603. Deborah Windley (ZIP code: [REDACTED])

604. M Witthaus (ZIP code: [REDACTED])

605. Isobel Middleton (ZIP code: [REDACTED])

I can't see how the proposed scheme will help relieve congestion in Glossop, which is already a bottle neck. It's an ill thought out expensive vanity project that won't solve the problem.

606. Wendy Steciuk (ZIP code: [REDACTED])

607. Lewis Coupland (ZIP code: [REDACTED])

608. yVETTE RIBOT-SMITH (ZIP code: [REDACTED])

609. Zacchaeus Warrington (ZIP code: [REDACTED])

The way the bypass is done isn't going to solve the issue, I believe the weight limit is a good solution

610. Zafar Iqbal (ZIP code: [REDACTED])

As a resident of Glossop since 1979, I have seen the traffic congestion around Glossop worsen over the decades, especially, Mottram, Hollingworth and A57 into Glossop centre. I fully support this petition. The link Road will simply re-route the congestion into Glossop, not, improve the situation along the A57 through the town.

611. Zara Fernley (ZIP code: [REDACTED])

612. Zoe Turner (ZIP code: [REDACTED])

PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT

REJECT THE PROPOSED A57 LINK ROADS SCHEME

The Mottram bypass and Glossop Spur now called the A57 Link Roads were promised to relieve congestion in Glossopdale. They won't.

According to National Highways who are proposing the scheme *'this scheme does not do anything to relieve congestion in Glossop but attracts more traffic along the A57'*

More traffic means more carbon emissions, at a time when nearly everyone recognises that emissions need to be reduced dramatically, to prevent runaway climate change. More traffic also means more air pollution, and more accidents

There will be no relief for Hollingworth and Tintwistle. The proposed road doesn't bypass the villages. Heavy traffic, noise and pollution will continue to blight residents' lives.

The A57 Link Roads are estimated to cost £180 Million; will bring at least two years of disruption; and will do nothing to solve our traffic problems.

For a fraction of the cost (around £10 million) a plan for low carbon travel in Longdendale and Glossopdale could be implemented.

NAME	SIGNATURE	
K. GARMAN		
S. TURNER		
B BUCKLEY		
Gary Milton.		
D. Hinchliff		
Mike Aldridge		
Sandra Aldridge		
P. MORRISON		
A. MOUSSA		
Jane Ches		
Carl Beckett		

on 10/11

10/11

**PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT
CONTINUED - REJECT THE PROPOSED A57 LINK ROADS SCHEME**

NAME	SIGNATURE	POST CODE
E. Cosgrove		
Paul Siddall		
A WILSON		
A. MARTIN		
P. Townsend		
M. H.		
H. Lawley		
B. HIGGINS		
J. Kiddle		
J.P. Ryan		
R. Gladwell		
Shirley SHIRLEY GOSDICK		
S. H.		
D. J. D.		
S. Dixon		
L. O'Reilly		
E. Clarke		
J. CLARKE		
Colin Deelen		
Michal Smiga		
F. J. FLATTERY		

electronic = 1

**PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT
CONTINUED - REJECT THE PROPOSED A57 LINK ROADS SCHEME**

	NAME	SIGNATURE	POST CODE
1	Greenbridge	[REDACTED]	[REDACTED]
2	Brakel		
3	J HARRIS		
4	J CROWSHAW		
5	P WARREN		
6	William Cook		
7	J. Raine		
8	A M O'DONOHUEY		
9	Esther Lohrey		
10	M. Gleane		
11	A. BARNES		
12	ALAN TURNER		
13	MARY THOMPSON		

PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT

REJECT THE PROPOSED A57 LINK ROADS SCHEME

The Mottram bypass and Glossop Spur now called the A57 Link Roads were promised to relieve congestion in Glossopdale. They won't.

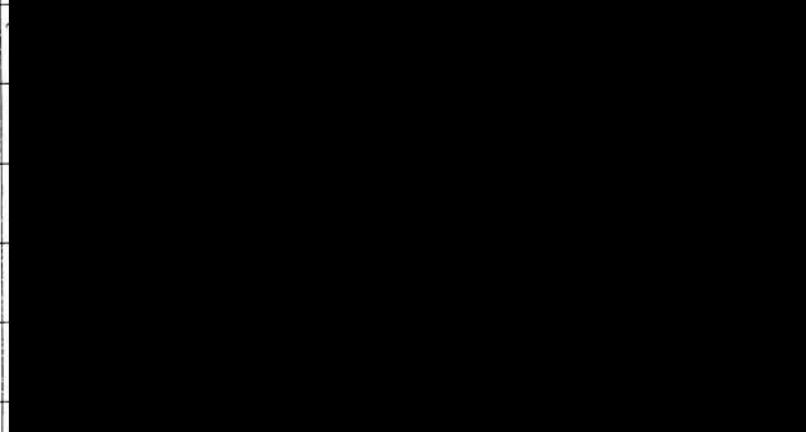
According to National Highways who are proposing the scheme *'this scheme does not do anything to relieve congestion in Glossop but attracts more traffic along the A57'*

More traffic means more carbon emissions, at a time when nearly everyone recognises that emissions need to be reduced dramatically, to prevent runaway climate change. More traffic also means more air pollution, and more accidents

There will be no relief for Hollingworth and Tintwistle. The proposed road doesn't bypass the villages. Heavy traffic, noise and pollution will continue to blight residents' lives.

The A57 Link Roads are estimated to cost £180 Million; will bring at least two years of disruption; and will do nothing to solve our traffic problems.

For a fraction of the cost (around £10 million) a plan for low carbon travel in Longdendale and Glossopdale could be implemented.

NAME	SIGNATURE	POST CODE
D ASTBURY		
J LONGMIRE		
C LONGMIRE		
JA. Johnston		
B. Barry		

5

PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT

REJECT THE PROPOSED A57 LINK ROADS SCHEME

The Mottram bypass and Glossop Spur now called the A57 Link Roads were promised to relieve congestion in Glossopdale. They won't.

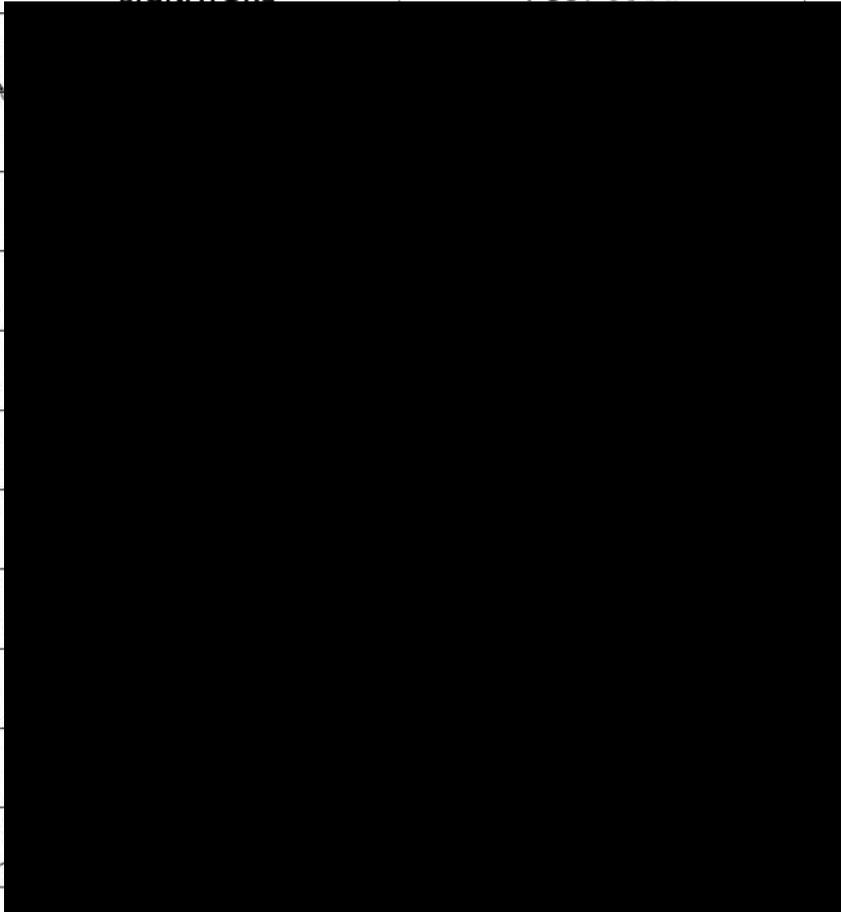
According to National Highways who are proposing the scheme *'this scheme does not do anything to relieve congestion in Glossop but attracts more traffic along the A57'*

More traffic means more carbon emissions, at a time when nearly everyone recognises that emissions need to be reduced dramatically, to prevent runaway climate change. More traffic also means more air pollution, and more accidents

There will be no relief for Hollingworth and Tintwistle. The proposed road doesn't bypass the villages. Heavy traffic, noise and pollution will continue to blight residents' lives.

The A57 Link Roads are estimated to cost £180 Million; will bring at least two years of disruption; and will do nothing to solve our traffic problems.

For a fraction of the cost (around £10 million) a plan for low carbon travel in Longdendale and Glossopdale could be implemented.

NAME	SIGNATURE	POST CODE
J. R ITSON		
J. Smith		
G. Y Wood		
P. Dyce		
A. Abuse,		
A. HOPNEY		
Liz Woolley		
JUDITH LEARVE		
KAY WOOD		
NICOLA MORGAN		
J. Bucko		

PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT

REJECT THE PROPOSED A57 LINK ROADS SCHEME

The Mottram bypass and Glossop Spur now called the A57 Link Roads were promised to relieve congestion in Glossopdale. They won't.

According to National Highways who are proposing the scheme *'this scheme does not do anything to relieve congestion in Glossop but attracts more traffic along the A57'*

More traffic means more carbon emissions, at a time when nearly everyone recognises that emissions need to be reduced dramatically, to prevent runaway climate change. More traffic also means more air pollution, and more accidents

There will be no relief for Hollingworth and Tintwistle. The proposed road doesn't bypass the villages. Heavy traffic, noise and pollution will continue to blight residents' lives.

The A57 Link Roads are estimated to cost £180 Million; will bring at least two years of disruption; and will do nothing to solve our traffic problems.

For a fraction of the cost (around £10 million) a plan for low carbon travel in Longdendale and Glossopdale could be implemented.

NAME	SIGNATURE	POST CODE
NINA HILL		
ALISON KING		
John Parker		
MARGARET HALL		
JACKIE MELLOR		
Julie O'Reilly		
JANE TURNER		
Math Pollard		
S. J. Harney		
D Hopkins		
ARANT NIBMO		



reject

PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT
CONTINUED - REJECT THE PROPOSED A57 LINK ROADS SCHEME

NAME	SIGNATURE	POST CODE
LINDA NEWMAN		
Elin Cole		
A TWIRSK		
R BALL		
MATT HILL		
Ian Inglis		
Dave Dawson		
MIKE WINDSOR		
TOM HOUSEMAN		
J BAIRSTOW		
Bo Lin		
MIKE EADES		
hug adie		
KAYE BOOTH		
Jonathan Smith		
Ann Smith		
George Howard		
S HURST		
STELLA DAVENPORT		
D BARNES		

**PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT
CONTINUED - REJECT THE PROPOSED A57 LINK ROADS SCHEME**

NAME	SIGNATURE	POST CODE
C. Kisho		
A. CRANDER		
K. D. AUBNEY		
T. LAWTON		
P. Bradshaw		
A. Bradshaw		
S. Bradbury		
P. N. Edge		
M. Redats		
K. W. M. M. M. M.		
Amy Wilson		
Lisa Fresset		
T. SHAPPEES		
M. Regan		
P. Ross Jr		
Christine Daniels		
Robert Daniels		
Gillian Kerr		
Margaret Hopkins		
A. Chetty		
T. GREAVES		




**PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT
CONTINUED - REJECT THE PROPOSED A57 LINK ROADS SCHEME**

NAME	SIGNATURE	POST CODE
Amanda Hallsell		
Cecilia Cole		
Philip Clinton		
H - BARLOW		
J. [unclear]		
KIM SIDEBOTTOM		
Mrs [unclear]		
ANTHONY LAWRENCE		
CHRY CALBY		
Steve Bradburn		
SHELLEY MANOLI		
Geoff Nolan		
J. Nolan		
J. McLINNEY		
ENOIE		
MRS. J. BARROW		
D. KIRKHAM		

e pet

**PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT
CONTINUED - REJECT THE PROPOSED A57 LINK ROADS SCHEME**

NAME	SIGNATURE	POST CODE
Lorraine Smithson		
Katie Southward		
Charlotte Allen		
WILLIAM LOWERY		
Bethany Pitt		
Katrina McKeever		
Stephen Thornton		
C.G. Brown		
Ann Clark		
Richard Love		
G R PARTON		
P.T MEREDITH		
D. E. PROUD		
J. PARKER		
Lee Parker		
J. TREVOR		
M. JONES		
J WATTS		
Tracey Riley		
Daniel Williams		
Jodie Williams		

on epet.

PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT

REJECT THE PROPOSED A57 LINK ROADS SCHEME

The Mottram bypass and Glossop Spur now called the A57 Link Roads were promised to relieve congestion in Glossopdale. They won't.

According to National Highways who are proposing the scheme *'this scheme does not do anything to relieve congestion in Glossop but attracts more traffic along the A57'*

More traffic means more carbon emissions, at a time when nearly everyone recognises that emissions need to be reduced dramatically, to prevent runaway climate change. More traffic also means more air pollution, and more accidents

There will be no relief for Hollingworth and Tintwistle. The proposed road doesn't bypass the villages. Heavy traffic, noise and pollution will continue to blight residents' lives.

The A57 Link Roads are estimated to cost £180 Million; will bring at least two years of disruption; and will do nothing to solve our traffic problems.

For a fraction of the cost (around £10 million) a plan for low carbon travel in Longdendale and Glossopdale could be implemented.

NAME	SIGNATURE	POST CODE
Sohn Hall		
Jayne Hall		
Jemma Hall		
JACKIE BRAMHALL		
CHARLES WATT		
Helen Robson		
Jan Brun		
GILL SCOTT		
Abdullah		
COLLINS		
G. Jee		

2-pet

PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT

REJECT THE PROPOSED A57 LINK ROADS SCHEME

The Mottram bypass and Glossop Spur now called the A57 Link Roads were promised to relieve congestion in Glossopdale. They won't.

According to National Highways who are proposing the scheme '*this scheme does not do anything to relieve congestion in Glossop but attracts more traffic along the A57*'

More traffic means more carbon emissions, at a time when nearly everyone recognises that emissions need to be reduced dramatically, to prevent runaway climate change. More traffic also means more air pollution, and more accidents

There will be no relief for Hollingworth and Tintwistle. The proposed road doesn't bypass the villages. Heavy traffic, noise and pollution will continue to blight residents' lives.

The A57 Link Roads are estimated to cost £180 Million; will bring at least two years of disruption; and will do nothing to solve our traffic problems.

For a fraction of the cost (around £10 million) a plan for low carbon travel in Longdendale and Glossopdale could be implemented.

NAME	SIGNATURE	POST CODE
Clodagyt		
Paul Dobson		
Carole Hains		
S. Baxter		
S. Keene		
Steve Sme		
Sarah Johnson		
DAVID EGLIN		
Jennifer Gladwell		
ANDREW NEWSON		

epet

**PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT
CONTINUED - REJECT THE PROPOSED A57 LINK ROADS SCHEME**

NAME	SIGNATURE	POST CODE
RICHARD HEADWORTH		
Kathy Shaw		
SHEENA WATERHOUSE		
James GERRARD		
Paula Hedden		
Amulohy		
JIMCOES		
SA WINGROVE		
Michael Fox		
ARAD		
E.D.		
Emily Harrison		
J. Paulsen		
Business		
J. HUGHES		
M BAILEY		
D. Carter		
K. O'CONNOR		
P. HUGHES		
D. CONNOLLY		
Sam Lewis		

**PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT
CONTINUED - REJECT THE PROPOSED A57 LINK ROADS SCHEME**

NAME	SIGNATURE	POST CODE
S WALSH		
TADAMORSON		
M WANS		
J. Burton		
D. Goodwin		
W. ...		
Staves		
A THORNHILL		
K ORELLUN		
DA ADAMS		
C. ADAMS		
J Dixon		
L Heald		
E. Larusck		
L. Lindert		
L Caldwell		
J. Strrogen		
M. J. Strrogen		
A. Williams		
S. Parkin		
S. Grandidge		

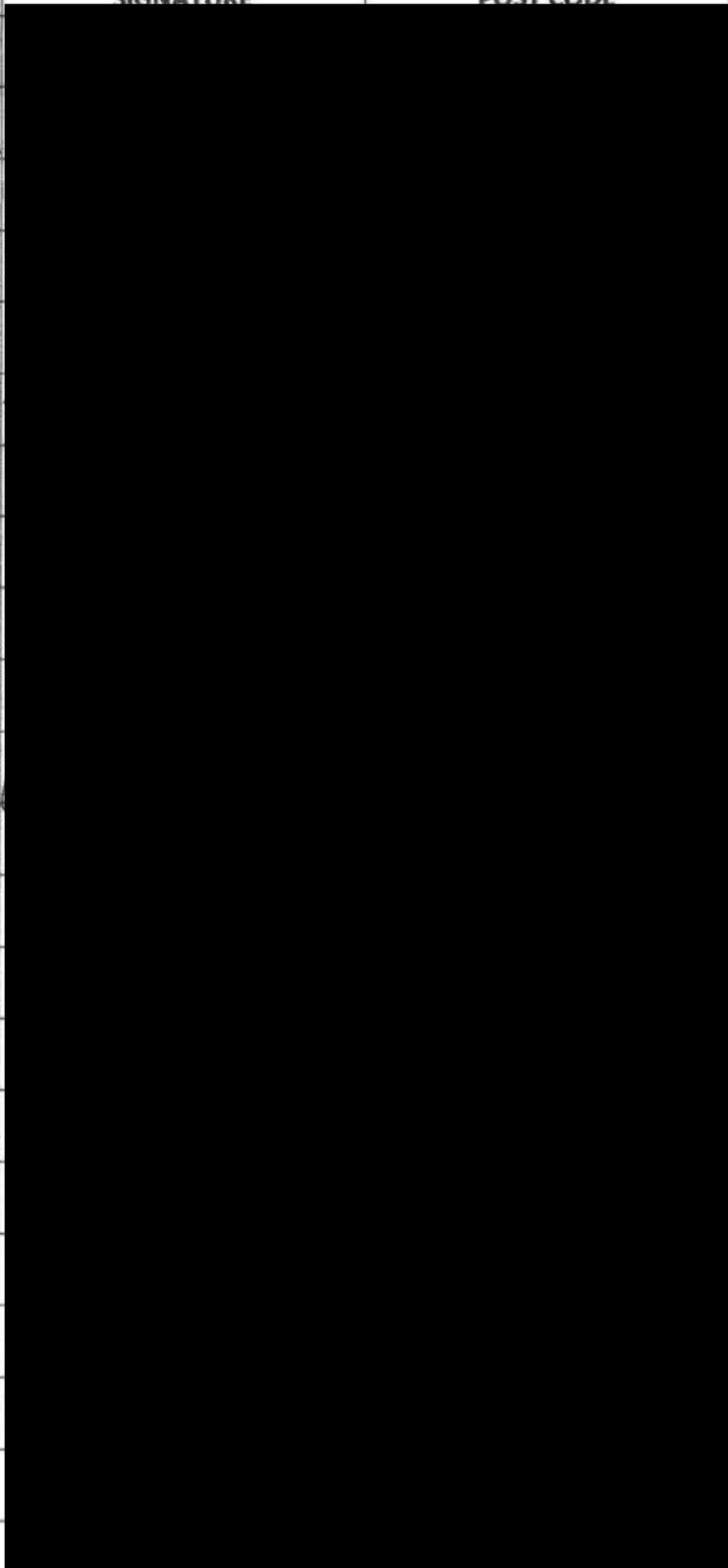
John St

(21)

**PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT
CONTINUED - REJECT THE PROPOSED A57 LINK ROADS SCHEME**

NAME	SIGNATURE	POST CODE
Sandy Sharpe		
Robert O'Connor		
Cherie Collins		
Sue Rodriguez		
COLIN DUNN		
KAREN HUNT		
RAY COLLINS		
Geoff Entwistle		
L. Brennan		
Jessica Whalley		
D.S. GILLIGAN		
C. Hirst		
G. Hirst		
Helen Taylor		
S. BROWN		
K. Jordan		
S. Pickering		
J. Lomax		
D. GIBBZ		
T. Mearns		

**PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT
CONTINUED - REJECT THE PROPOSED A57 LINK ROADS SCHEME**

NAME	SIGNATURE	POST CODE
J. J. Jones		
Tracy Budden		
Joanna Krysa		
E. Ryan		
F DUNN		
N. B. O'Brien		
J. T. Smith		
I. EASON		
P. TURNER		
J. DiBartolo		
G. HARTLEY		
E. EASTON		
Bill ROBB		
ANTHONY HARRIS		
Tom Lane		
Leah Peplow		
C. BIDDLE		
N. HOVERY		
C. SKELTON		
C. WEAVER		
M. Allison		

**PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT
CONTINUED - REJECT THE PROPOSED A57 LINK ROADS SCHEME**

NAME	SIGNATURE	POST CODE
15		
Helen O'Donoghue		
Daniel Hill		
Jessica Hanlon		
Sarah Johnson		
MIKE HIGGINS		
B WILSON		
Scott Clary		
Howard Groves		
Howard Groves		
RUTH GROVES		
Joanne Miller		
EMMA TERRY		
DANE CLOUGH		

PETITION TO GRANT SHAPPS SECRETARY OF STATE FOR TRANSPORT

REJECT THE PROPOSED A57 LINK ROADS SCHEME

The Mottram bypass and Glossop Spur now called the A57 Link Roads were promised to relieve congestion in Glossopdale. They won't.

According to National Highways who are proposing the scheme *'this scheme does not do anything to relieve congestion in Glossop but attracts more traffic along the A57'*

More traffic means more carbon emissions, at a time when nearly everyone recognises that emissions need to be reduced dramatically, to prevent runaway climate change. More traffic also means more air pollution, and more accidents

There will be no relief for Hollingworth and Tintwistle. The proposed road doesn't bypass the villages. Heavy traffic, noise and pollution will continue to blight residents' lives.

The A57 Link Roads are estimated to cost £180 Million; will bring at least two years of disruption; and will do nothing to solve our traffic problems.

For a fraction of the cost (around £10 million) a plan for low carbon travel in Longdendale and Glossopdale could be implemented.

NAME	SIGNATURE	POST CODE
Jeroen Peters		
Andy Williams		
J. Hallett		
K Callan		
MARK PUGH		
PETER SIMON		
JOANNA COLLIER		
Keith Moss		
NA JONES		
MARION BELL		

Submission number: 13

Date submission received by PINS: 8 November 2022

Name: CPRE PDSY

From: [Anne Robinson](#)
To: [A57 Link Roads](#)
Cc: [TRANSPORTINFRASTRUCTURE; Tomo Thompson](#)
Subject: A57 Link Roads TR010034
Date: 08 November 2022 20:05:55
Attachments: [Outlook-mhkula5t.png](#)
[2022-11-8 CPRE PDSY to SoS re NH response FINAL.pdf](#)
[2022-8-25 CPRE PDSY report on National Highways Non Compliance with Licence.pdf](#)

Unique Reference: 20029243

Please find attached our response to the Secretary of State's invitation to respond to National Highways response of 31st October. It is accompanied by a report on National Highways noncompliance with its licence to which we refer in our response.

Best wishes
Anne

Anne Robinson
Campaigner
CPRE Peak District and South Yorkshire
p: [REDACTED]
a: Victoria Hall, 37 Stafford Road, Sheffield, S2 2SF



Run and managed by CPRE Peak District and South Yorkshire. Reg. Charity No 1094975. Reg. Company No 4496754.
This e-mail is confidential and may well also be legally privileged. If you have received it in error, you are on notice of its status. Please notify the sender immediately by reply e-mail to and then delete this message from your system. Any review, dissemination, distribution, copying or other use is strictly prohibited. Any views expressed in this message are those of the individual sender and may not necessarily reflect the views of the Campaign to Protect Rural England (CPRE) or its associated companies.

This email has originated from external sources and has been scanned by DfT's email scanning service.



The countryside charity
Peak District and
South Yorkshire

37 Stafford Road
Sheffield S2 2SF

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,

A handwritten signature in blue ink that reads "Anne".

Anne Robinson
Campaigner

Unique Reference: 20029243

NATIONAL HIGHWAYS NON-COMPLIANCE WITH ITS LICENCE CONDITIONS

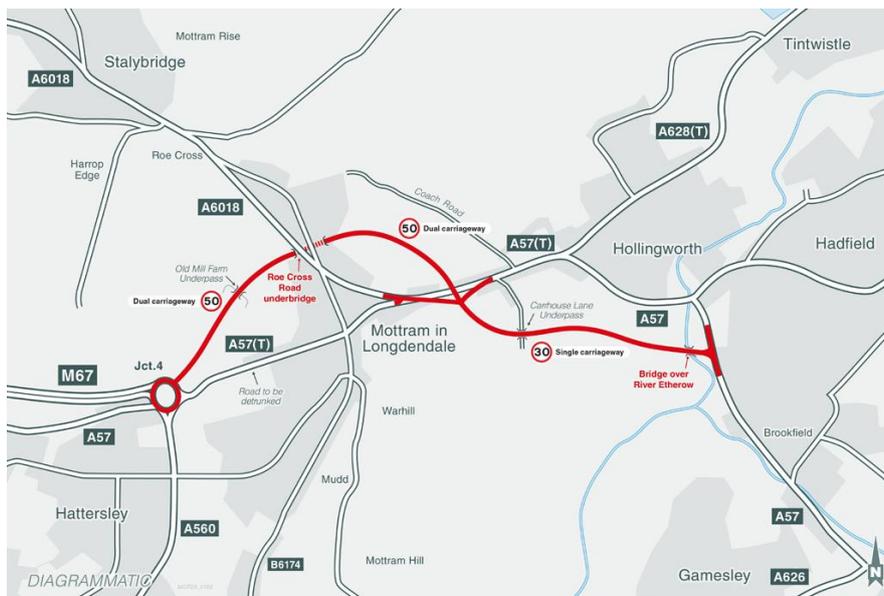
- 1 CPRE PDSY is a branch of CPRE, the countryside charity. We are also as the Friends of the Peak District, the National Park society for the Peak District National Park and a member of the Campaign for National Parks. We believe in a thriving, beautiful countryside, rich in nature and playing a crucial role in the response to the climate emergency. Our goal is a countryside that's valued, enjoyed and understood by, and accessible to, everyone, wherever they live. Through all our work we look at the role of our countryside in tackling the climate emergency, including seeking ways to increase resilience and reduce impact.
- 2 Through our engagement with Highways England/National Highways' (NH) plans for major road building impacting on the Peak District we have found that the company has not complied with several of its licence conditions, some of which are statutory directions. This relates particularly to the development and progression of its proposed A57 Link Roads¹. The non-compliance described below represents not only a serious malfeasance but also demonstrates that the process through which the A57 Link Roads has passed has been both unlawful and encumbered by participatory unfairness making any decision which might be made to proceed with the scheme untenable. As the Highways Monitor, we understand that the Office of Rail and Road (ORR) monitors National Highways' compliance with the statutory directions and regard to the guidance issued by the Secretary of State for Transport (SoS) in its licence. We are therefore bringing this non-compliance to your attention.
- 3 **With respect to the A57 Link Roads we urge the ORR to assess NH's performance in the light of this representation to you and report your findings to the SoS before they make a decision on the scheme in mid-November 2022. More generally we urge the ORR to enforce behaviour that is expected of a public body. In particular, we suggest that the ORR a) insists on, or provides, much more robust assessment and monitoring of scheme development from options appraisal through project business case, and b) reviews or instigates a review of the NSIP proposal and DCO process, for example in line with paragraph 29 below.**
- 4 The document is laid out as follows
 - (A) Background
 - (B) Behaviour unacceptable in a public body, Licence para 5.19, as demonstrated by
 - (1) Statutory consultations
 - (2) Transport Assessment Report
 - (3) NH's response to CPRE PDSY's requests for information

¹ The scheme appears in ORR's Annual Assessment of NH's Performance 2021-2022, Tables B4 and B11 <https://www.orr.gov.uk/sites/default/files/2022-07/annual-assessment-of-national-highways-performance-2022-print.pdf>

- (4) Examination of Development Consent Order (DCO) application
- (C) Failure to comply with statutory directions in the Licence, paras 4.1 management of Strategic Road Network (SRN), 4.2 general duties on Licence holder and 5.29 Government policy
- (D) Failure to have regard to guidance in the Licence, paras 5.15 and 5.23
- (E) Conclusions.

BACKGROUND

- 5 The A57 Link Roads (the scheme) developed as NH's favoured option out of the 2015 Trans-Pennine Routes Feasibility Study². It is a dual carriageway bypass of Mottram between the M67 and the A57T, continuing as single carriageway extension A57T to A57 to Glossop, which would effectively bypass part of the A57 called Woolley Lane (see figure below). National Highways (or Highways England as it was) held statutory consultations on the scheme in 2018³ and 2020⁴. (The scheme was called the Trans-Pennine Upgrade until 2020 when it became the A57 Link Roads.)



- 6 As a Nationally Significant Infrastructure Project (NSIP) the scheme's draft DCO was submitted to the Planning Inspectorate (PINS) on 28th June 2021, when all the application documents became publicly available, and was accepted for examination on 26th July 2021. The examination of the DCO application was conducted between 16th November 2021 and 16th May 2022. The Examining Authority (ExA)'s recommendations must be made by 16th August 2022 and the SoS's decision must be made by 16th November 2022.

² <https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports>

³ <https://highwaysengland.citizenspace.com/he/trans-pennine-upgrade/>

⁴ <https://highwaysengland.co.uk/our-work/north-west/a57-link-roads/#overview>

- 7 CPRE employed a professional transport planner, Keith Buchan of MTRU (Metropolitan Transport Research Unit), to develop our alternative proposals to the scheme for consideration through the 2015 Trans-Pennine Routes Feasibility Study and to give evidence to the Examination-in-Public (EiP)⁵. MTRU's engagement in the EiP led to consistent and expert challenge by a professional transport planner with extensive experience.
- 8 As a branch of CPRE we have had a 50 year history of engagement with the scheme in all its iterations. The evidence we present here is focused on our engagement with development of the scheme over the last 8 years; a comprehensive assessment of both the 2018⁶ and 2020⁷ statutory consultations which was submitted to the PINS as evidence of the inadequacy of the consultations; and full engagement as an Interested Party (IP) at the EiP into the scheme. We objected to the scheme on the basis that sustainable alternatives exist that should be trialled before unsustainable road building is pursued. We are not here concerned about the scheme and its impacts except in so far as they demonstrate non-compliance by NH.
- 9 All the DCO documents for the scheme appear on the PINS website⁸. References beginning REP, EV, APP, AoC or AS refer to documents in the EiP library. The library lists all documents accepted into the EiP and provides links to each one. See footnote for link to the Library⁹.

Framework for assessment of NH's performance

- 10 The expectations of NH run higher than the conditions of its licence. They are spelt out in the Foreword to the licence by the Minister for Transport at the time: *'Government remains responsible for strategic roads and Ministers will continue to be accountable for making sure that the network is managed responsibly, in a way that safeguards value for public investment, meeting the needs of road users, securing individual well-being and*

⁵ Our alternative package comprised exclusion of through-traffic of HGVs through the Peak District National Park, including on the A57/A628/A616T with sustainable transport measures.

⁶ <https://infrastructure.planninginspectorate.gov.uk/projects/north-west/a57-link-roads-previously-known-as-trans-pennine-upgrade-programme/?ipcsection=advice&ipcadvise=73c2ad0ecc>

⁷ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-Advice-00007-1-A57-Link-Roads-Email_Redacted.pdf On 24th May 2021 we submitted additional information to PINS about the inadequacy of the consultation which appears to have been removed from the PINS website but a summary can be found in REP2-069 Appendix B.

⁸ <https://infrastructure.planninginspectorate.gov.uk/projects/north-west/a57-link-roads-previously-known-as-trans-pennine-upgrade-programme/?ipcsection=docs>

⁹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-000603-A57%20Link%20Road%20Examination%20Library%20Published.pdf>

supporting economic purpose, both today and for future generations... This document represents a crucial part of that system, by setting out the Secretary of State's statutory directions and guidance to Highways England. It makes clear, to both Highways England and the wider community of road users and stakeholders, what we expect Highways England to achieve and how they must behave in discharging their duties and in delivering our vision and plans for the network, set out in the Road Investment Strategy.

- 11 *The Licence emphasises that the role of Highways England is about more than just complying with the letter of the law. We expect the company to go the extra mile in the way it engages with road users and collaborates with other organisations to develop shared solutions. And they must take a lead in promoting and improving the role and performance of roads in respect of broader communal responsibilities, such as the aesthetics of design, safety and the environment, as well as driving forward wider progress on technology and innovation.'*
- 12 In addition the baseline standard of the Seven Principles of Public Life (the Nolan Principles) applies to anyone who works as a public officeholder, including all people appointed to work in non-departmental public bodies, such as NH¹⁰. Five of the seven principles are key to our assessment. These are:
- Objectivity - Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
 - Accountability - Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
 - Openness - Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
 - Honesty - Holders of public office should be truthful.
 - Leadership - Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.
- 13 It is within this context that we have assessed NH's performance, under the headings (B) Behaviour Unacceptable in a Public Body, (C) Failure to Comply with Statutory Directions in the Licence, and (D) Failure to Have Due Regard to Guidance in the Licence.

¹⁰ <https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-of-public-life--2>

(B) BEHAVIOUR UNACCEPTABLE IN A PUBLIC BODY

- 14 We start with the licence condition that applies to NH's interface with the public. Although para 5.19 is not a statutory direction, it should be a golden thread through all NH's interactions with organisations and the public, and we quote it below for reference.

Licence Para 5.19 In complying with 5.17 and 5.18, the Licence holder should co-operate with other persons or organisations in a way which is demonstrably:

- (a) Open and transparent – involving relevant stakeholders, ensuring that essential information is available to affected and interested parties, and that the processes for engagement and communication are clear;**
- (b) Positive and responsive – seek to build trusting and effective working relationships with key partners and stakeholders, engaging with due efficiency and economy and in a timely manner;**
- (c) Collaborative – working with others to align national and local plans and investments, balance national and local needs and support better end-to-end journeys for road users.**

- 15 We show below, through (1) the statutory consultations; (2) the Transport Assessment Report; (3) NH's response to CPRE's requests; and (4) the EiP, how NH omitted critical evidence that was crucial to understanding the scheme's impacts, presented biased evidence, misrepresented evidence, refused to share information, was reluctant to give straight answers to questions and failed to follow best practice.

(1) The statutory consultations

- 16 Through both statutory consultations NH withheld and refused to share essential information. There was insufficient information to allow the public to make an informed assessment of the impacts of the scheme. Some of the statements were misleading and bordered on the dishonest. NH steered the consultations away from over-arching fundamental questions, such as the need for the scheme and possible alternatives, towards detailed matters of design.

2018 statutory consultation

- 17 No transport assessment or traffic modelling results and little information as to the impacts of the scheme on the environment or the community¹¹ were made available during this first statutory consultation. As a result High Peak Borough Council,

¹¹ We brought this to the attention of the Planning Inspectorate and relevant local authorities by letter dated 11th March 2018.

Derbyshire County Council and the Peak District National Park Authority all submitted holding objections.

18 In view of these omissions, we asked Highways England if it would make traffic data available for the next consultation. It promised to do so¹² but the promise was never honoured.

2020 statutory consultation

19 The second 2020 statutory consultation was held during a complete lockdown for the Covid pandemic. NH claimed to have mitigated the effect of the restrictions but comparison of the 2018 and 2020 consultations revealed the only ‘mitigation’ was the addition of 3 non-interactive webinars. These provided wholly inadequate replacements for face-to-face events. In addition, people were expected to view hard copies of the documents in three cramped local post offices (as local authority offices were closed) or to view the documents on line.

20 A DCO applicant has a duty to consult the community in accordance with the Statement of Community Consultation (SoCC)¹³. The SoCC stated *‘we’re publishing ... consultation material to assist well-informed responses to the consultation... The report will provide information about the potential environmental effects of the scheme.’* The consultation material comprised a colour brochure delivered to the majority of households in the area, a non-technical summary and three volumes of the Preliminary Environment Information Report (PEIR). The SoCC-promised delivery of a 37-page document of FAQ to the majority of households in the area did not occur. Air pollution, noise and carbon emissions were the only impacts assessed and then only partially. The omissions and misrepresentations from the consultation were extensive and are detailed in Appendix A. They included no transport assessment, traffic data or traffic modelling; no mention of the adverse impacts on Glossopdale, on the Peak District National or on the Green Belt; a misleading impression that road safety would improve; and a brochure which focused to the exclusion of all else on the immediate benefits to residents of Mottram and on Woolley Lane – a sales pitch for the scheme, not an honest presentation of its effects.

21 Just as with the preceding statutory consultation in 2018, in the 2020 statutory consultation neither the public nor the statutory consultees had the information available to them to make informed responses. Once again Derbyshire County Council,

¹² Email to CPRE PDSY 23rd March 2020 *‘Thank you for your email dated 19 February 2020 regarding the article about the Trans Pennine Upgrade in the Manchester Evening News.... I can confirm that we will honour our promise to present the plans and results of the air quality, noise and traffic figures to the public at engagement events scheduled for later this year, prior to a DCO application’.* Ryan Rawson, Regional Investment Programme (RIP) North Assistant Project Manager

¹³ Planning Act 2008 s 47

High Peak Borough Council and the Peak District National Park Authority all submitted holding objections based on lack of information in the PEIR and the absence of any traffic modelling or transport assessment.

- 22 The degree to which the impacts of the scheme were withheld from the public through the consultation only became apparent through the scrutiny allowed by the EiP. These impacts included (i) increased traffic impacts and congestion causing rat running on residential streets (counter-productive to the adoption of active travel measures), poorer urban environment and increased risk of road crashes, all within Glossopdale; (ii) increased risk of road crashes on both the SRN and the local road network, particularly the A57 Snake Pass; (iii) severe adverse impacts on the Green Belt; (iv) increased traffic on cross-National Park roads. None of these are mentioned in any of the consultation documents. The brochure delivered to everyone's home concealed information that would have a huge impact on people's well-being. The statements on road safety in the FAQ were in total contradiction to the results presented with the DCO application and bordered on the dishonest. The concealment alone is sufficient to make the consultation on the scheme invalid, and to call into question the validity of the claimed support for the scheme, not to mention NH's integrity.
- 23 The statutory consultations are the only means available to the public to gain an informed impression of the scheme and its impacts. PINS regards them as the best time to influence a project whatever one's opinion¹⁴. The next step, the DCO application, is daunting, technical, requires huge amounts of time to read thousands of pages of evidence, and total commitment to keep up with weekly deadlines, answering questions from the Examining Authority (ExA), rebutting evidence and scanning revised versions of NH's original documents. It therefore excludes the majority of the public who do not have the resources or perseverance to engage.
- 24 NH is required to produce a Consultation Report to show how it met its legal duties with respect to consultation and took account of the comments made. The Consultation Report is therefore an important document. Best practice¹⁵ advice is for those making a DCO application to make it available before the application is submitted to PINS. NH refused to do this when we asked¹⁶ and only submitted it with the DCO application. It therefore failed to follow best practice. Seeing the comments made and NH's response to them would have helped the public prepare for the DCO process.

¹⁴ <https://infrastructure.planninginspectorate.gov.uk/application-process/the-process/>

¹⁵ Planning Act 2008: Guidance on the Preapplication Planning Process, 2015, para 81
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418009/150326_Pre-Application_Guidance.pdf

¹⁶ Email from CPRE to NH 17 May 2021 asking if the consultation report will be available before the DCO application is made, as good practice advises. Email from NH to CPRE 25 May 2022 advising that full consultation report will be published when DCO application is submitted

- 25 Once the DCO application is submitted, all the local authorities are invited to submit adequacy of consultation reports to PINS. Although all responded that NH had held the consultation according to the SoCC, Derbyshire County and High Peak Borough Councils (AoC-003) and the Peak District National Park Authority (AoC-004) drew attention to multiple flaws in the consultation; and reported that insufficient information was published with the consultation to enable them and the local community to determine the likely impacts of the scheme. The Councils also reported that they had *'received multiple letters from residents which raised similar concerns'*.
- 26 In summary, both consultations were a travesty of what a consultation should be. Under its licence NH is bound to follow the Cabinet Office guidance on consultation. The current version of this, issued in 2018, encourages those preparing consultations to *'give enough information to ensure that those consulted understand the issues and can give informed responses'*. The Gunning Principles for consultation¹⁷ require *'There is sufficient information to give 'intelligent consideration' - The information contained in a consultation document should not be as inaccurate or incomplete as to mislead potential consultees in their responses.'* The Aarhus Convention guarantees the right of access to environmental information held by or for public authorities, subject to limited conditions.
- 27 We have shown above that the consultation did not follow best practice according to any of these principles or guidance. It was not conducted in an open and transparent way. The limited amount of information available was so selective it was biased to the point of being dishonest, and would likely be prejudicial to a party affected by the decision. No-one could have made an intelligent consideration of, or submitted an informed response about, the scheme's impacts.
- 28 It appears contrary to good practice to have received holding objections from the statutory consultees in response to the 2018 consultation, and not addressed those concerns before holding another statutory consultation. An effective approach would have been to address all the statutory consultees' concerns and to then seek public views before proceeding to a DCO application. Development of a NSIP should be front loaded with a WebTAG compliant transport appraisal and full environmental impact assessment available for public scrutiny before the formal DCO process is entered. This was not done.

¹⁷ <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>
Supreme Court in *R (Moseley) v Haringey London Borough Council* [2014] 1 WLR 3947

(2) Transport Assessment Report (APP-059)

- 29 The failure to supply full information about the transport impacts, the traffic modelling and traffic data continued into the DCO application. A full WebTAG compliant appraisal, essential to understanding the impacts of the scheme, was not presented as part of the DCO application, as required by National Policy Statement National Networks 2014 (NPSNN) 5.207. The Transport Assessment Report (TAR) accompanying the DCO application did not allow full comprehension of the traffic effects of the scheme or provide sufficient evidence to test the impacts of the scheme against legal, policy and guidance requirements.
- 30 The withdrawn but de facto guidance states that *'a TA is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel¹⁸*. Current Government Guidance¹⁹ for planning states *'Transport Assessments are thorough assessments of the transport implications of development'*, and *'care should be taken to establish the full range of studies that will be required of development at the earliest opportunity as it is unlikely that a Transport Assessment or Statement in itself could fulfil the specific role required of a transport element of an Environmental Impact Assessment where this is required'* as in this scheme (our emphasis).
- 31 Despite all this guidance NH reduced the main purpose of the TAR as *'to summarise the development of the Scheme in a single, stand-alone report for general consumption.²⁰* The omissions and flaws detailed in Appendix B show how far the TAR fell short of presenting a report for general consumption, never mind a 'thorough', 'comprehensive and systematic' assessment of the transport implications of the scheme. No details were given of the traffic modelling and the results showed numerous inconsistencies, still unexplained at the end of the EiP. In three and a half pages it named the modelling software and used three figures to show the modelled area and local zone disaggregation. There was no local model validation report, no forecasting report, no options report, no strategic case report, no economic case report, no appraisal summary. The impact of increased traffic within Glossopdale was barely addressed - the increased risk of road crashes on residential roads, severance of pedestrians, the impact of HGVs, longer travel times were not mentioned or addressed. Journey time savings were limited to parts of journeys, not actual journeys the travelling public would make. There was no assessment of the impact on buses.

¹⁸ Guidance on Transport Assessment, DfT & DCLG, 2007, para 1.2

¹⁹ <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>

²⁰ TAR 1.6.3

- 32 We challenged NH on the quality of the TAR when the DCO documents were submitted but did not receive a reply until well into the EiP. It was defensive and dismissive²¹: *'It is not normal practice to submit all the detailed information relating to the traffic and economic analysis and modelling of a scheme due to the complexity and sheer volume of the data that underpins it, which cannot generally be understood and interpreted by interested parties, unless they are specialists in the fields of traffic modelling and economic analysis²².'*
- 33 Notwithstanding that NH knew there would be, and was, at least one transport professional (MTRU) engaged in the EiP, this was obstructive and counter to understanding the scheme's impacts. Others also challenged the quality of the TAR to which NH responded²³: *'The Transport Assessment Report (TAR) (APP-185) was prepared in accordance with industry standard best practice which is based on previous Department of Transport (DfT) guidance on the preparation of transport assessment that was withdrawn several years ago and not subsequently replaced by alternative guidance. Therefore, currently there is no guidance regarding the preparation of transport assessments for transport schemes'*. Due to the poor assessment we and other IPs appealed to the ExA [REP10-017] that NH should produce a Web-TAG compliant transport appraisal that addressed our concerns. The ExA did not respond to our request. NH did respond [AS-011] as a late submission to the penultimate deadline, reasserting arguments previously made.
- 34 In summary, the TAR contained highly selective information designed to promote the scheme and conceal the serious adverse impacts it would impose. NH failed to meet the minimum standard set by Government for TARs as a 'comprehensive and systematic' assessment of the transport implications of development, let alone go the extra mile required by its licence. NH has no excuse for producing such a poor assessment.
- 35 The lack of transparency regarding the information and data about the traffic modelling is most serious. It limits the public's involvement in the EIA process, which is important, not just to ensure compliance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regs'), which seek to ensure a process by which the public is given an opportunity to express their opinion on environmental matters, but also with the Aarhus Convention in respect of public participation. The public can only participate and give a reasonable opinion on environmental matters if sufficient background data on projected environmental effects is provided. It also undermines the process through which the SoS will seek to ensure that he is satisfied that the material

²¹ REP7-025, 9.69.5

²² REP5-021 page 13

²³ REP7-026, 9.70.33

provided by NH is sufficient for him to reach a reasoned conclusion on the significant effects of the proposed development on the environment.

(3) NH response to CPRE PDSY's requests for information

36 On our behalf Keith Buchan of MTRU began asking for background data on the transport appraisal and traffic modelling in March 2021 in order to inform the development of our alternative proposal and to understand scheme effects. His requests received no response. NH claimed not to have received the emails, although MTRU had never experienced such difficulties with NH before. Although we were told that the failure to receive MTRU emails was being investigated, a year later we have not received any details and on occasion NH did receive emails directly from MTRU. From May 2021 CPRE forwarded all emails from MTRU to NH. We have dealt with our experience during the pre-EiP period, through four key documents supplied to us and during the EiP.

i. Pre-examination

37 Listed below are our repeated requests by email for information relating to the full transport appraisal²⁴, only one of which was successful (in bold).

- 8th June 2021 we resubmitted our list of requested documents²⁵, all of which would have been available had a full WebTAG compliant appraisal been undertaken.
- 22nd Jul 2021 we asked if the sifting of options exercise²⁶ had been repeated since the 2015 Transpennine Routes Feasibility Study and for a response to 8th June email.
- **24th Aug 2021 NH confirmed 'that we have not repeated the Early Appraisal Sifting Tool (EAST) since finalising the options in 2015'.**
- 30th July having read the DCO documents we submitted questions and request for information (summarised in footnote below to show they were straightforward²⁷).

²⁴ REP12-034 which is a compilation of the emails between us and NH.

²⁵ Local Model Validation Report; TUBA outputs for vehicle kilometres and carbon (if not in above); Options Report; Strategic Case; Economic Case; Forecasting report, including use of DfT scenario approach; Assessment Summary Table.

²⁶ A57 Link Roads 6.3 Environmental Statement (ES) Chapters 1-4 Introductory Chapters Planning Inspectorate scheme reference: TR010034 Application document reference: TR010034/APP/6.3 para 3.3 Page 97 of 134

²⁷ Local model and forecasting report or data missing, other than the Transport Assessment (TA) and Appendix 2.1; WebTAG compliant appraisal not submitted but implied in TA, please submit it. Flow diagram in the TA and Appendix 2 are not clear as to their exact position on the roads to which they refer. Is there a labelling issue with Market Street in Hollingworth? Questions:

- 1 What models were used in addition to SATURN for the junctions?
- 2 What are the costs for signalling Junction 4 and what were the traffic impacts of doing this without the full scheme?
- 3 Which DIADEM elements were switched on and off?
- 4 How was walking and cycling included?
- 5 How was public transport included?
- 6 What are the forecasts or assumptions for the local modelled area for:
Public transport (today – 2025 – 2040)

- 6th August NH indicated it was dealing with our 30th July request under the terms of the Environmental Information Regulations 2004 with a due date for issuing a response of 20th August.
- 24th August NH, responding to our email 6th Aug, referred us to the transport modelling and forecasting reports submitted with the DCO. As we have shown above in para 32 there were no transport modelling and forecasting reports submitted with the DCO.
- 2nd Sept we repeated our request for information.
- 15th September 2021, MTRU made a formal complaint *'about the failure to supply basic information on a major scheme DCO: the A57 Link Roads. This has two aspects: the failure to supply the information and the way in which specific requests have not been answered or answered in an unsatisfactory manner. This has severely restricted the ability to scrutinise the justification for the scheme... Please engage with me so that my information requests can be met and my requests for clarification answered.'* To date, MTRU's formal complaint has still not been addressed.

38 NH's target to respond to emails is within a maximum of 10 working days. The only email which received a response within 10 working days was the email in which NH invoked the Environmental Information Regulations 2004 – NH failed to meet this deadline too. The blatant delay in responding was uncooperative and negative. Directing us to where information could be found, knowing full well that it was absent, breaks multiple Nolan principles. NH's approach to dealing with our requests for the full transport appraisal was in contrast to general enquiries which were dealt with in a timely fashion, including those relating to the scheme's environmental statement and road collisions which were addressed under Freedom of Information. This gave us the impression that NH had something to hide from scrutiny in the background transport work to the scheme.

39 For eight months NH were uncooperative, unhelpful and withheld information about the full transport appraisal that should have been supplied with the DCO application. Finally in the evening of Friday 12th November - one working day before formal proceedings for the EiP commenced on Tuesday 16th November - four background documents were sent to us; the Combined Modelling and Transport Appraisal Report, the Economic Appraisal Package, the Transport Forecasting Package and the Transport Modelling Package for the A57 Link Roads.

Cycling (today – 2025 – 2040)

Walking (today – 2025 – 2040)

7 Are the time savings in Figure 7.7 to the junctions at each end but not through it? Are there more details of real origin and destination pairs and zone to zone timings?

8 Do you have queue length data for key junctions?

ii) The four background documents – REP2-090

- 40 When NH shared the four technical documents they told us they would not be submitting them to the EiP *‘due to the technical depth of these documents. The Transport Assessment produces the data in layman’s terms and should be used instead²⁸’*. In the interests of openness and transparency we submitted them to the EiP at with our written representation on January 14th 2022, Deadline 2. They were accepted by the ExA and published by PINS as one combined document - REP2-090 (in which two of the documents are repeated). A number of IPs, including CPRE, referred to REP2-090 in their submissions. At first NH ignored references made to it. However, on 23rd February 2022 in response to IP submission REP3-032 drawing attention to REP2-090, NH stated²⁹:
- 41 *‘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’*.
- 42 This statement was not only misleading, it was also incorrect [REP6-032]. The full package of information accompanying the DCO application was accepted by the Planning Inspectorate on 26 July 2021. The four documents were released by NH to CPRE on 12th November 2021, nearly 4 months after the DCO application was accepted, not in advance of its submission.
- 43 Furthermore these documents are 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. The fact that the four documents were accepted by the ExA indicates they must have been considered of use to the EiP; the ExA and IPs were able to read them in the context of all the supporting information for the scheme. We found them crucial for scrutinising evidence. They emphasised the poverty of information in the TAR and how much essential evidence NH had withheld. For example:
- 44 The Transport Forecasting Package revealed that refinements were made to the model during development of the scheme in order to reduce air pollution in Tintwistle and Dinting Vale Air Quality Management Areas (AQMAs), and along Glossop High Street West³⁰. The pollution arising from the scheme would otherwise have been of such

²⁸ Draft Note of meeting between NH and CPRE, para 6, 15 December 2021

²⁹ REP5-021 page 13

³⁰ REP2-090 7.3.1 pdf page 519/790

severity that it was considered that it would jeopardise the application for development consent. These model refinement steps could have led to the anomalies in the traffic outputs described above. They could also have led to differences between 2025 'do minimum' and 'do something' modelled traffic flows through both AQMAs and along the A57 not meeting the criteria for, and therefore being excluded from, assessment of air quality³¹. They could also have led to changes in traffic flows on the A628T with the scheme not meeting the criteria for assessment under the Habitats Regulations Assessment.

- 45 The Transport Forecasting Package also revealed that the traffic model had been applied to reduce traffic flows on the A57 through Glossop and divert them onto residential roads, leading to all the consequences described in para 32 above. It revealed a diversionary route labelled 'Hadfield Alternative'. This information was not available in any of the DCO documents and was a key point of concern to IPs³².

iii) During the EiP

- 46 Once the EiP started and the ExA was taking note of proceedings NH became more responsive. We had two technical meetings with NH during the EiP on 15th December 2021 and 19th January 2022 in order to allow MTRU to ask questions, request information and increase our understanding of the transport assessment. The meetings were led by NH; direct technical dialogue with those undertaking the assessment of the scheme was not allowed. This fundamentally limited our understanding. The bulk of the requested information was supplied by 7th March [REP7-025, 9.69.61]. However the data requested on public transport was never satisfactorily resolved (see Appendix C a. below).
- 47 We initially agreed to aid the EiP and the ExA as to where we did and did not agree with NH through a Statement of Common Ground (SoCG). Due to NH's obfuscation and ignoring our requests for clarification we were unable to complete this.
- 48 In summary, NH was completely resistant to engaging with us and providing information before the EiP started. There was no good reason for withholding any of it, and it could all have been shared at the latest with the DCO application. Once the EiP started, the formal process required at least a show of cooperation but even that was hampered by NH's restrictive management of the dialogue.

³¹ Through the Tintwistle AQMA the predicted vehicle flows were 40 vehicles per day short of the threshold (an increase of 1,000 AADT) required by the guidelines. The shortfall to meet the criteria for the Habitats Regulation Assessment was 150 vehicles per day. The PDNPA in its Local Impact Report REP2-048, 8.3.12 through to its deadline 9 response REP9-035 pp 3-4 submitted a sustained judgement that the European sites adjacent to the A628T must be assessed but was ignored.

³² REP2-089; REP4-027 pp4-5; REP9-051 pp1-3; REP9-049

(4) Examination of the DCO application

49 The topics through which NH tried to conceal crucial evidence are detailed in Appendix C. They ranged from assessment of public transport; assessment and review of appraisal options; explanations of the spurious traffic data, the uncertainty log and associated development; increase in vehicle kms; a sensitivity test for carbon emissions; visibility of the scheme to the public; major nearby development Godley Green Garden Village; and the impacts of national and regional policy on public transport walking and cycling policy on the scheme. The tactics demonstrate a spectrum of behaviour from delay in producing information to the extent it was too late for the EiP to consider, trying to show due process had been followed when it had not, avoidance of answering questions and drip feeding small amounts of information, playing circular games, offering diametrically opposing answers to the same repeated question, and poor understanding of its own evidence. All this wasted EiP time and opportunities for proper scrutiny, gave rise to a lack of confidence in the work undertaken by NH and its contractors, and challenged the integrity of the environmental, social and economic assessment of the impacts of the scheme.

Summary of non-compliance with Licence para 5.19

50 Both statutory consultations misled the public as they were prejudicially biased, withheld information critical to understanding the impacts of the scheme and failed to meet basic standards of consultation. NH, when dealing with our requests for information, failed to engage in an open, transparent, responsive and collaborative way. Instead it was obstructive, only improving its behaviour once under observation from the ExA. The TAR presented with the DCO application was an exceedingly superficial assessment of the scheme from which crucial evidence was withheld. NH's approach throughout the EiP was to reduce adverse impacts to insignificance and to dismiss challenges, rather than engage in constructive dialogue. It was evasive, obstructive and defensive, and frustrated the many attempts to get substantive answers that would aid understanding of the scheme's impacts.

(C) FAILURE TO COMPLY WITH STATUTORY DIRECTIONS IN THE LICENCE

Licence Para 4.1 It must operate and manage the SRN in the public interest in respect of both current activities and needs and in providing effective stewardship of its long-term operation and integrity.

51 The process of addressing the problems along the A57/A628/A616T corridor was deeply flawed. The A57T is but one section of the strategic South Pennines Corridor between the Port of Liverpool and the Humber Ports³³. Instead of addressing the whole route the 2015 Trans-Pennine Routes Feasibility Study focused on the traffic 'hot spot' at Mottram. It excluded another strategic corridor, the M62, the traffic on which interacts

³³ South Pennines Route Strategy 2017 Highways England

with the A628T corridor. The study focused on highway matters, avoided a multimodal approach, and failed to adopt a full corridor approach. It did not therefore follow the WebTAG requirements to start with a blank sheet, consider transport problems in the round and consider all solutions including non-transport ones³⁴. This narrow approach is reflected in the South Pennines Route Strategy in which all the issues on the SRN are solved with highway interventions without due regard to modal shift to rail. The Mayor of Liverpool has expressed his dissatisfaction with this approach in his recent rejection of the A5036 Port of Liverpool dualling at the west end of the corridor³⁵.

- 52 The scheme under examination is what remains of previous, larger scale proposals (the 2007 Mottram-Hollingworth-Tintwistle bypass). The issue of piecemeal implementation disguising real strategic impacts was dealt with as far back as the 1980s and by SACTRA. Yet even now this piecemeal approach continues to east and west of the scheme within this corridor. To the east NH is exploring the feasibility of the Hollingworth-Tintwistle bypass³⁶. It is likely that the current scheme will increase traffic along the A628T through Hollingworth and Tintwistle, fuelling irresistible demands for road building to relieve the villages. The next step would then be the proposed dualling of the corridor to the M1³⁷. Any extension to the east would impact directly on the Peak District National Park and bring the test of major development in a National Park into play. By developing a small length of the corridor the big strategic impacts are avoided and resistance is reduced as each piece passes through its formal process as a standalone scheme.
- 53 In the other direction, five miles to the west along the M67, the M67/M60 J24 Denton Island interchange was excluded from the scheme's assessment. Yet the interchange has long been recognised as a pinch point for congestion³⁸ in need of improvement, and the proposed interventions are part of the Trans-Pennine Upgrade of which this scheme is a part. *'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... It is included in*

³⁴ Transport Analysis Guidance The Transport Appraisal Process, DfT, 2014
<https://webarchive.nationalarchives.gov.uk/ukgwa/20181209040649/https://www.gov.uk/government/publications/webtag-transport-appraisal-process> The more recent version published in May 2018 carries the same information
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938766/tag-transport-appraisal-process.pdf

³⁵ Liverpool City Region Mayor, letter to SoSfT re A5036

³⁶ 2020 statutory consultation FAQ; RIS2 2020-2025

³⁷ Trans-Pennine tunnel study

³⁸ South Pennines Route Strategy 2017 Highways England; South Pennines Route-Based Evidence Strategy Report, Highways England, 2014, Figure 3; South Pennines Route Strategy, Highways England, 2017 p.29

the Highways England Risk Register for the project³⁹. The A57 Link Roads would add, according to NH modelling, an extra 8,000 vehicles every weekday to the M67 in 2025 the opening year⁴⁰. Adding in traffic from the proposed nearby major development Godley Green Garden Village (see Appendix C ix) would lead to the interchange operating at above or approaching capacity⁴¹. National Highways' plans for mitigation measures at the M60 J24 interchange were not mentioned in the DCO application.

- 54 All these failings stem from a failure of those undertaking an appraisal to understand and/or have due regard for the strategic context within which a proposal sits, as identified by the Treasury's Green Book 2020 (see para 92 below). Effective stewardship of the SRN's long term operation and integrity also requires a strategic multimodal approach, which NH has failed to take.
- 55 Increasing carbon emissions in a climate crisis is not effective stewardship in the public interest. In June 2021 the Climate Change Committee stated: *'Decisions on investment in roads should be contingent on analysis justifying how they contribute to the UK's pathway to Net Zero. This analysis should demonstrate that the proposals would not lead to increases in overall emissions⁴².'* In June 2022 it identified that *'Substantial investment in roadbuilding should only proceed if it can be justified how it fits within a broader suite of policies that are compatible with the UK's Net Zero trajectory⁴³.'* The case for the A57 Link Roads was developed many years in advance of DfT's Decarbonising Transport (2021) and the UK's Net Zero Strategy (2021), and did not foresee these key policy documents of the current legal framework, let alone attempt to align with them. The traffic modelling failed to express either document's policy objectives or targets as core assumptions - the current traffic models are based on assumptions which reflect very different scheme specific objectives that date from many years ago.

Licence Para 4.2 Without prejudice to the general duties on the Licence holder under section 5 of the Infrastructure Act 2015, the Licence holder must, in exercising its functions and complying with its legal duties and other obligations, act in a manner which it considers best calculated to:

Para 4.2d. It must ensure efficiency and value for money.

- 56 NH prematurely rejected alternatives (our package of lorry control system and sustainable travel measures; and the proposed Mottram Gyrotory Flow) that both

³⁹ REP12.028 Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 page B34 para 15.3.8; pdf page 110/170 - submitted by CPRE

⁴⁰ A57 Link Roads, ES, Appendix 2.1 Traffic Data, AAWT Opening Year 2025

⁴¹ Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 page B32 Table 9 pdf 108/170

⁴² Table A6 pdf page 20/32 Joint Recommendations Report to Parliament, Climate Change Committee June 2021

⁴³ Page 139, Progress Report to Parliament, Climate Change Committee, June 2022

scored as well or better than the scheme in the 2015 Trans-Pennine Routes Feasibility Study.

57 Our package was rejected as difficult to deliver – updated technology has simplified lorry control systems based on weight restrictions. The MGF, as proposed by an IP Mr Bagshaw, was initially described⁴⁴ as the ‘*best performing individual option against the sifting criteria and for meeting the objectives for the Scheme*’ and as deliverable and feasible. Then, curiously, at this point in the assessment of options⁴⁵ it was decided to assess the MGF not as a standalone scheme, nor in conjunction with other sustainable measures, but in conjunction with a package of measures which included first and foremost a link road between the A57 (T) and the A57 in Glossop.

58 As NH failed to review the options during development of the outline business case for the scheme, the scheme is not proven to provide the most efficient and best value for money. The Economic Case for the scheme has not been made.

59 Compounding this error is the failure to include public transport, walking and cycling in the traffic modelling, which led to a BCR that does not reflect the current policy framework. The Government plans to cut urban traffic by increasing walking and cycling to 50% of all trips by 2030. Greater Manchester plans for no net increase in motor vehicle traffic and to reduce car’s share of trips to no more than 50%, with the remaining 50% made by public transport, walking and cycling by 2040. Had the traffic modelling reflected these policy measures it would have shown a reduction in traffic forecasts for the scheme, and therefore a reduction in the value of journey time savings and the value for money. The failure to include public transport walking and cycling is part of NH’s failure to engage with the strategic context of the proposal (see para 92).

Licence Para 4.2e. It must protect and improve the safety of the network.

60 The SRN and local road network would become more dangerous for drivers, not safer, with the scheme. The risk of road crashes would increase across the modelled network by 0.3%, the brunt of which would occur on the A628T and the A57 Snake Pass (county A road across the National Park). Despite the increased risk being a direct result of the scheme NH dismissed it as insignificant and offered no mitigation.

61 The increased crashes on the A628T would appear despite, and would negate the effect of, the A628T Safety and Technology improvements, previously part of the scheme but progressed separately as not requiring development consent. The improvements focus

⁴⁴ REP2-005 revised ES Ch 1-4 Introductory Chapters, page 100 Table 3.3 (23 Options assessed at the initial sift)

⁴⁵ Trans-Pennine Routes Feasibility Study, 2015, Appendix 2, the Stage 2 Report of this same study [Annexes – Annex 1], para 5.9

on crash hotspots and the provision of electronic signs⁴⁶ and were included within the baseline 'do minimum' scenario⁴⁷ for the scheme. The increased risk of crashes on the trunk route is due to traffic diverting off the safer motorway network and onto the A628T⁴⁸. In addition, *'the severity of the accidents which are predicted to occur on the new link road may increase due to the increased speed'* (TAR 7.2.12). NH's acceptance of increased crashes on the SRN does not meet the statement in Road Investment Strategy (RIS) 2020-2025: *'enhanced safety remains Highways England's first imperative and informs everything it does from design principles, road standards, operational procedures and investment decisions. We will strengthen this ambition through our investment plan, performance specification and targeted safety improvements through the small schemes fund'*.

- 62 The A57 Snake Pass *'is forecast to experience a modelled predicted increase of more than 160 accidents over the 60-year appraisal period'⁴⁹* with the scheme. NH took the attitude that *'safety features in areas outside the Scheme are not within the Applicant's remit'⁵⁰*. The route is already considered a high risk rural road. To mitigate the scheme's impacts Derbyshire County Council proposed the use of average speed cameras. However, such measures would cause harm to the National Park's statutory purposes and were challenged by the National Park Authority⁵¹. In the face of these difficulties NH proposed to 'update' the model with respect to the incidence of crashes on the Snake Pass at the detailed design stage when there would be no accountability through the EiP. *'It is possible that the appraisal overestimates the forecast increase in accidents on this section of road...'* *'...scheme modelling will be updated as the detailed design evolves'⁵²*. The start of the Snake Pass is 3.2miles east of the scheme. The detailed design of the scheme is not going to alter the incidence of crashes on the Snake Pass unless it includes a massive traffic restraint measure akin to the Mottram crossroads and/or average speed cameras along the Pass. This 'updating' appears most unusual as the modelling of accidents on the Snake was set up to ensure the most accurate relationship between accidents and flow [REP2-090, 4.7.32-4.7.33]. It appeared to us as subterfuge – an attempt to 'magic away' adverse impacts of the scheme and avoid mitigation which could prove difficult and costly to implement.

⁴⁶ The Case for the Scheme 2.1.9

⁴⁷ ES Ch1-4 Introduction 2.4.6-2.4.9; 3.4.5

⁴⁸ APP-185, 7.2.13

⁴⁹ Transport Appraisal 7.2.11-7.2.13

⁵⁰ Consultation Report Appendix Y page 167

⁵¹ REP12-014 SoCG between PDNPA and NH, 2.3.6

⁵² REP9-020 SoCG between Derbyshire County Council and NH, 9.5

Licence Para 4.2f. It must cooperate with other persons or organisations for the purposes of coordinating day-to-day operations and long-term planning;

- 63 This duty stems from section 5(1) of the Infrastructure Act 2015, to cooperate with other persons or organisations in order to:
- (a) Facilitate the movement of traffic and manage its impacts;
 - (b) Take account of local needs, priorities and plans in planning for the operation, maintenance and long-term development of the network (including in the preparation of route strategies);
 - (c) Provide reasonable support to local authorities in their planning and the management of their own networks.
- 64 We have not been privy to any of the meetings between the statutory stakeholders and NH. What follows has been collected from written statements made before and during the EiP. On the evidence before us NH has failed to meet this duty and licence condition.
- 65 As noted in para 22 above two local authorities and the Peak District National Park Authority put in holding objections on the basis of inadequate information. The latter changed this to an outright objection. This reflected not only the adverse impacts on the National Park, but also the lack of information available in the DCO documents.
- 66 HPBC requested an extension to the 2020 statutory consultation area so that all wards within Glossopdale would receive a coloured brochure about the scheme. This was denied.
- 67 NH refused to meet High Peak Borough Council's request to assess air quality through two AQMAs. It remains an area 'not agreed' through the SoCG⁵³ (see para 45 above).
- 68 NH dismissed the need for mitigation measures requested by High Peak Borough and Derbyshire County Councils for traffic impacts and increased risk of road crashes. NH considered all these impacts to be insignificant and not requiring mitigation. Towards the end of the EiP NH agreed to work on some measures, outside the DCO process, thus avoiding public scrutiny.
- 69 It refused to meet the Peak District National Park Authority's request to assess the impacts of the scheme on the European Natura 2000 sites adjacent to the trunk route⁵⁴, on the Tintwistle AQMA and on the Tintwistle Conservation Area.

⁵³ REP12-008 & REP12-025 SoCG between High Peak Borough Council appears in library twice, documents are the same, paras 9.5, 9.18 & 9.20; REP2-046, 19.1 HPBC Local Impact Report; REP9-033

⁵⁴ REP12-014, 2.1.1.2, 2.3.1

70 Although NH's safety responsibilities are limited to the SRN, it is expected to cooperate with government agencies, the devolved administrations, local government, enforcement authorities, a host of other public and private bodies, and road users to improve road safety⁵⁵. Every Local Highway Authority with responsibility for the roads that would see increased crashes with the scheme in place unanimously seek reduction of road crashes and casualties, all of which NH has ignored both in future day-to-day operations and long term planning:

- DCC LTP 3 2011-2026;
- South Yorkshire Mayoral Combined Authority⁵⁶, which aims to improve safety on the network for all users. *'Safety for all road users must remain of paramount importance'*;
- South Yorkshire Local Transport Plan aims to maximise safety⁵⁷;
- Sheffield City Council Transport Strategy (2018)⁵⁸;
- Kirklees MBC 2025 Transport Vision⁵⁹;
- GMCA's *'ambition'* is *'To reduce deaths on our roads as close as possible to zero (by 2040)*⁶⁰.

71 In the final version of the SoCG between Transport for Greater Manchester (TfGM) and NH, TfGM requested that NH provide a response to how the scheme would contribute to the Government's Transport Decarbonisation Plan and to Greater Manchester's local carbon targets and budgets⁶¹. *'The Climate Emergency declarations that are guiding local policy and therefore 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'*. NH refused this request despite the requirements of NPSNN para 4.4 and the EIA Regulations. However, it *'prepared a table to split the predicted GHG emissions for Greater Manchester and ... has issued this to TfGM.'*

⁵⁵ DfT's The Road Safety Statement 2019 A Lifetime of Road Safety

⁵⁶ Roads Implementation Plan 2020 SY MCA <https://governance.southyorkshire-ca.gov.uk/documents/s3997/Annexes%201%20The%20Roads%20Implementation%20Plan.pdf>

⁵⁷ SY LTP 2011-2026 7.1-7.15

⁵⁸ Transport Strategy 2019-2035 Sheffield CC <https://www.sheffield.gov.uk/home/travel-transport/transport-strategy-plans>

⁵⁹ <https://www.kirklees.gov.uk/beta/planning-policy/pdf/supportingDocuments/transportInfrastructure/2025-Kirklees-Transport-Vision.pdf>

⁶⁰ Transport For Greater Manchester, 2040, revised Jul 2021, <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/supporting-documents/?folder=\09%20Connected%20Places#fList>

⁶¹ REP12-009 TfGM Statement of Common Ground para 10.3, pp 28-29

72 TfGM also asked NH ‘*how the scheme contributes to Greater Manchester’s Right Mix targets and the Greater Manchester’s 2040 policies*’. This is Greater Manchester’s plans for no net increase in motor vehicle traffic and to reduce car’s share of trips to no more than 50%, with the remaining 50% made by public transport, walking and cycling by 2040. NH avoided the request and gave a tangential answer. In fact the traffic modelling in which TfGM had played no part had taken no notice of the Right Mix targets, and hence it could not know what impact the scheme would have. It is still unclear if TfGM understands the impacts of the scheme as it was only engaged in scrutiny of the scheme through the SoCG

73 Despite the scheme creating adverse impacts on the responsibilities of all these authorities, NH refused to take responsibility for addressing them, deeming them insignificant and, if related to traffic impacts, the responsibility of the highway authority.

Para 4.2g. It must minimise the environmental impacts of operating maintaining and improving the network and seek to protect and enhance the quality of the surrounding environment;

74 NH fails to meet this statutory direction as follows.

75 Operational GHG emissions have not been minimised as no traffic restraint measures were applied to the proposal⁶². The scheme would result in 410,000tCO₂ emitted over 60 years.

76 Hollingworth and Tintwistle - NH has failed to minimise the environmental impacts of the SRN as it passes through Hollingworth and Tintwistle. These two villages straddle the A628T, lie immediately east of the scheme and experience traffic congestion with long queues, air pollution from heavy lorries and increased road crashes. Every consultation about the scheme has raised key concerns around these two villages, found the plans did not address their problems⁶³, and showed strong support for measures to relieve traffic through both villages. In the 2018 statutory consultation⁶⁴ Highways England declared it ‘*is unable to resolve*⁶⁵’, that Hollingworth and Tintwistle are not part of the solution. During the 2020 consultation NH refused to engage with questions on Hollingworth and Tintwistle, stating that measures for wider relief are at an early

⁶² NH stated orally that no restraint was applied to the traffic model for the current scheme [EV-25 Issue Specific Hearing 2 Session 2 page 10 3rd line]. However when summarising its position at the Hearing, NH ignored the wider and deeper questions posed by the ExA about restraint of motor vehicles, encouraging active travel, and promoting routes which avoid the National Park. It referred only to restraint applied to HGVs in 2015 Trans-Pennine Routes Feasibility Study when testing options [REP4-008 Item 3d page 15].

⁶³Trans Pennine Upgrade Programme Non statutory Consultation Report Oct 2017 4.10.3

⁶⁴ Trans Pennine Upgrade Report 2018 4.2.1

⁶⁵ Trans Pennine Upgrade Report 2018 4.2.1

concept design stage. Given that traffic along the entire Trans-Pennine route will be affected by the scheme this is a serious oversight. A strategic approach towards long term planning for the whole of the corridor would have avoided this.

77 The surrounding environment that the scheme would harm includes the (a) Peak District National Park, (b) Glossopdale and (c) Greater Manchester.

(a) The first statutory purpose of the National Park is to protect and **enhance** natural beauty wildlife and cultural heritage (our emphasis). The Dark Peak, crossed by both the A628T and the A57 Snake Pass, is famed for its desolate and exposed tracts of moorland that stretch great distances, create a sense of remoteness⁶⁶ and are largely inaccessible to motor traffic. The noise from traffic on all these roads already affects the natural beauty and tranquillity of the Park up to a mile distant on open moorland⁶⁷. The increased traffic generated by the scheme would further harm these nationally important landscapes and impair their tranquillity. NH refused to recognise that the impacts of increased traffic through the Peak District National Park would be significant, as considered by the statutory authority for the National Park, and offered no mitigation. The objection from the PDNPA shows that NH's interpretation of the National Park's statutory purposes and associated policies does not meet the standard required of it by its s.62 duty under the Environment Act 1995.

(b) Within Glossopdale the local environment would be impacted negatively by more congestion, rat running on residential roads, noise, and air pollution. NH dismissed the impacts as insignificant.

(c) The scheme would have a major irreversible negative effect on local landscape and townscape which NH refused to recognise as significant [APP-063, 7.7.8]. The scale and formality of its infrastructure - dual and single carriageways, three concrete underpasses, two bridges, huge new junction, lighting, signage, embankments cuttings and false cuttings, drainage features, fencing, access tracks, new plantings - and its associated traffic would encroach on and fragment open countryside reducing its permeability for wildlife; destroy the individual character of the pastoral landscapes; and harm the setting of the historic village of Mottram and the openness of the Green Belt. The huge new junction where the scheme crosses the A57T is out of scale with the surrounding townscapes. The scheme consumes open land, a finite irreplaceable asset in the UK. It is both natural capital and strategic open space, which supports multiple

⁶⁶ Dark Peak, Landscape Strategy, PDNPA, 2009

⁶⁷ Peak District National Park, State of the Park Report 2000, p 40 - Until recently the National Park was a complete tranquil area apart from Bakewell and Tideswell. By the late 1990s three roads with an excess of 10,000 vehicles per day within the Park, including the A628, reduced the tranquil area by 50%.

ecosystem services critical to urban areas which have higher vulnerability to climate change due to their lack of habitats.

Licence Para 4.2h. It must conform to the principles of sustainable development.

78 The licence spells out sustainable development as *'encouraging economic growth while protecting the environment and improving safety and quality of life for current and future generations.'* All of the above impacts described in paras 51-77 indicate that the scheme fails to conform to the principles of sustainable development.

Licence Para 5.29 It must comply with or have due regard to Government policy.

79 The NPSNN 2014 is the framework for decision making but recognises that relevant national, regional and local policies are in play. In particular a series of provisions of the Planning Act section 104 are incorporated in the NPS, and some of its requirements are specifically stated in terms of other laws and regulations such as the EIA Regs 2017. When dismissing challenges made by us or other parties using other policies, NH quoted NPSNN as the sole framework of relevance to decision-making. The scheme fails to meet a number of NPSNN policies as follows.

80 NPSNN 4.3 requires that for a proposed development the ExA and SoS should take into account its potential benefits, and its potential adverse impacts. The transport assessment and modelling are fundamental to the environmental assessment. With so many omissions and unexplained spurious results within them, it is not credible to even attempt to reach a reasoned conclusion on the significant effects of the proposed development.

81 NPSNN 4.4 requires environmental, safety, social and economic benefits and adverse impacts, to be considered at national, regional and local levels. There was no local or regional assessment of the scheme's carbon emissions despite two sets of available data (BEIS UK carbon emissions national stats and local authority SCATTER budgets from the Tyndall Centre), and a third set of self-scaling data – a local/regional proxy – provided by the study area and traffic model itself (when corrected and fully transparent) [REP9-039]. Local adverse impacts of all kinds – social environmental and economic – were concealed from the public and stakeholders at consultation stage and underplayed during the EiP (see paras 23, 32; Appendix A b-g; Appendix B b-g; Appendix C c, f, i, j).

82 NPSNN 4.6 – projects should usually be supported by a local transport model to provide sufficiently accurate detail of the impacts of a project. The impacts on Glossopdale were withheld from the public as detailed above (see para 23 above) and then from the EiP. When pressure on the issue increased throughout the course of the EiP NH stated that the work had been done, and yet still refused to share their findings with the Examination [REP8-018, Q3.6]. NH's detailed analysis of the traffic on one select link

[REP9-029], Dinting Road, appeared to validate IPs' requests for further analysis of all of Glossopdale but none was forthcoming [REP12-022, 9.87.8].

- 83 NPSNN 4.15-4.17 invokes Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which sets out the information that should be included in the environmental statement. The assessment of GHG emissions does not conform to these requirements [REP8-029, 7.5]. First, it does not provide an accurate quantification of the scheme in isolation; second, it does not provide a proper quantification of the cumulative carbon emissions; therefore, the application is not compliant with the EIA Regulations [REP8-029]. NH's claim that the traffic model is 'inherently cumulative, or is 'compliant with DMRB', does not make the environmental statement compliant with the EIA Regulations on cumulative carbon emissions assessment.
- 84 NPSNN 4.26-4.27 lists the legal and policy requirements for consideration of alternatives, which are not exhaustive. As we have shown above the 2015 options appraisal was flawed and has not been reviewed. Therefore the scheme's status within the RIS, the 2004 Tameside Metropolitan Borough Council Unitary Development Plan 2004 and the Greater Manchester Transport Strategy 2040 is questionable.
- 85 NPSNN 2, 2.24, 3.2 and 4.64-4.66 address road safety. The increased risk of road crashes on the A628T corridor and on local roads means NH has failed to meet the requirements of NPSNN which quotes the Strategic Framework for Road Safety 2011⁶⁸.
- 86 NPSNN 5.11-5.12 Air quality considerations are particularly relevant where schemes are proposed within or adjacent to AQMA or nature conservation sites (including Natura 2000 sites and SSSIs), and where changes are sufficient to bring about the need for a new AQMA or change the size of an existing AQMA; or bring about changes to exceedances of the Limit Values, or where they may have the potential to impact on nature conservation sites. NH adjusted the modelling in a way which removed potential exceedances of limit values for nitrous dioxide within 2 local AQMAs (one on the A57 Dinting Vale through Glossop and one on the A628T through Tintwistle), on A57 High Street West through Glossop and on the Natura 2000 sites adjacent to the A628T. NH refused to assess air quality at any of these locations including the two AQMAs. Hence these NPSNN considerations have been ignored.
- 87 NPSNN 5.150 Great weight should be given to conserving landscape and scenic beauty in nationally designated areas. Despite the scheme causing traffic increases on cross-Park roads, NH refused to recognise this requirement, arguing incorrectly that the policy only applies to development that lies within the National Park.

⁶⁸ <https://www.gov.uk/government/publications/strategic-framework-for-road-safety>

- 88 NPSNN 5.152 requires NH when planning the SRN to avoid National Parks, in this case the Peak District National Park. This it failed to do. The 2015 Trans-Pennine Routes Feasibility Study focused only on the corridor through the National Park. In addition, the scheme would cause traffic to divert off the M62 outside the National Park onto the A628T within the National Park.
- 89 NPSNN 5.202 *Development of national networks can have a variety of impacts on the surrounding transport infrastructure including connecting transport networks... The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development.* NH dismissed the scheme's impacts on the local road network as insignificant and refused to consider mitigation. They also refused to share with the Examination the work they had done which justified their conclusion that the effects were 'insignificant'.
- 90 NPSNN 5.207 requires the WebTAG methodology to be followed. We showed above (paras 30-36 and Appendix B) how the TAR failed to meet the requirements of a WebTAG compliant appraisal.
- 91 Other policies with which NH failed to comply, or to which it failed to have due regard, include:
- (a) The Treasury's *Green Book 2020* identified the common failure of those writing appraisals to engage properly with the strategic context in which their proposal sits. Specifically, business cases frequently do not demonstrate the necessary understanding of:
- the proposal's specific contribution to the delivery of the government's intended strategic goals (such as levelling up or net zero); and
 - the specific social and economic features of different places and how the intervention may affect them;
 - other strategies, programmes or projects with which the intervention may interact, including in a particular geographical area.
- This results in significant flaws in appraisals and business cases. All of the above bulleted shortfalls apply to the A57 Link Roads, were initiated in the 2015 Trans-Pennine Routes Feasibility Study from which the scheme derives⁶⁹, and have led to the noncompliance described in paras 52-60 and 78-91 above, and here in para 92.

⁶⁹ Trans-Pennine Feasibility Study, Highways England & DfT, 2015

<https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports>

- (b) The UK Net Zero Strategy 2021 - NH made no assessment of significance of the scheme's carbon emissions against the annual carbon reduction targets and trajectories for transport in the Net Zero Strategy [REP9-039, 10].
- (c) The Government's Decarbonising Transport, A better greener Britain; Bus Back Better – National Bus Strategy for England; and Gear Change – A bold vision for cycling and walking. By omitting walking, cycling and public transport (except rail users with access to a car) from its transport assessment NH has failed to comply with all of these.
- (d) *National Planning Policy Framework 2021, para 175*. NH refused to recognise that great weight should be applied to protection of the National Park and its setting. The objection from the PDNPA shows that NH's interpretation of the National Park's statutory purposes and associated policies does not meet the standard required of its s.62 duty under the Environment Act 1995.

Summary of noncompliance with statutory directions in Licence

92 Through development of the A57 Link Roads NH is failing to meet the public interest and provide effective stewardship of the long term operation and integrity of the SRN. The value for money of the scheme has not been ensured as the options' appraisal was flawed and has not been reviewed. The scheme would be detrimental to the safety of the network, not protect or improve it. NH has failed to co-operate with the local authorities and the National Park Authority over a number of issues. It has also failed to minimise environmental impacts – carbon emissions would increase; traffic would impact adversely on two adjacent villages, on Glossopdale, on the Peak District National Park; the proposed infrastructure is out of proportion to and would disfigure local landscape and townscape. Consequently the scheme does not conform to the principles of sustainability. This is reflected in NH's non-compliance with Government policy in NPSNN, the Treasury's Green Book, UK Net Zero Strategy, Decarbonising Transport, Bus Back Better, Gear Change and NPPF.

(D) FAILURE TO HAVE REGARD TO GUIDANCE IN THE LICENCE

Licence Para 5.15 It should seek to ensure protecting and improving safety is embedded into its business decision making, and to achieve the best possible safety outcomes.

93 The 2015 Trans-Pennine Routes Feasibility Study included a safety objective, against which the scheme scored +1 (beneficial impact). For the 2020 statutory consultation and for the DCO application the safety objective was omitted, despite high accident rates and accident clusters along the route, as safety measures were progressed separately from the scheme (the A628T Safety and Technology improvements). However, as these

measures were included in the baseline traffic modelling and road crashes increased, the mitigation appears to fail. Thus the evidence suggests safety was not embedded in the decision-making for this scheme, which would now score negatively (adverse impact) against such an objective.

Licence Para 5.23 It should ensure protecting and enhancing the environment is embedded into its business decision making.

- 94 NH did not avoid the Peak District National Park when planning the SRN as required by NPSNN 5.152.
- 95 There was no scheme objective to address GHG emissions or climate change despite the 2008 Climate Change Act and the UK's legally binding carbon budgets.

Summary of noncompliance with guidance in the Licence

- 96 Although these licence conditions are considered guidance, rather than statutory directions, they are extremely important. They are both concerned with business decision making which starts with options' appraisal, followed by scrutiny by DfT. Unless the initial appraisal is robust and scrutiny is rigorous the result will be a poor choice. The A57 Link Roads have been developed as a standalone scheme in order to build demand for the next section of new road. For fifty years NH and its predecessor organisations have been trying to force road building to link Manchester and Sheffield rather than address the transport issues within their strategic context. The Peak District National Park designation, through which the A628T corridor passes, does not permit major development unless there are exceptional circumstances and it is in the public interest. Most recently the climate and nature emergencies, and the experience of the Covid pandemic, also challenge the business-as-usual model of building roads to meet future traffic demand. The 50 year history of failed road solutions should be indication enough that what is required here is a fundamental rethink. The National Park designation and more recent events demand it. That is the context within which these licence conditions should be considered.

(E) CONCLUSION

- 97 We have documented above a catalogue of NH's non-compliance with the statutory directions and guidance laid down by the SoS in its licence. NH has evidently failed to meet baseline requirements, never mind meet higher expectations. The whole sorry story casts strong doubts on the credibility of NH and its evidence for the A57 Link Roads DCO application.
- 98 NH withheld crucial information, gave inconsistent, inaccurate or misleading statements and answers through the statutory consultations and the EiP. It repeatedly tried to

wriggle out of accountability for the scheme with obfuscation and delay. This is contrary to behaviour expected of a public agency to be as open as possible about all its decisions and actions, and to restrict information only when the wider public interest clearly demands.

99 The development of the scheme, from the 2015 feasibility study out of which it emerged to the DCO application, demonstrated all that the Treasury Green Book identified about the failure of project sponsors to engage properly with the strategic context in which their proposal sits. With respect to the A57 Link Roads NH failed to address (a) the proposal's specific contribution to the delivery of the Government's intended strategic goals in 2015 (such as climate change) and in 2021 (such as levelling up and net zero); (b) the specific social, environmental and economic features of Greater Manchester, Glossopdale, Longdendale and the Peak District National Park and how the intervention would affect them all; and (c) a raft of other strategies, programmes and projects with which the scheme would interact from the national to the more local. These ranged from addressing climate change and road safety - both key policy areas identified by the ORR for RIS3⁷⁰ - to Greater Manchester's transport decarbonisation programme through its Right Mix policy, and the PDNPA's goals to reduce traffic within, and through, the National Park.

100 The consequences of both NH's behaviour towards engagement with stakeholders and the public, and its failure as the steward of the long term sustainable future and integrity of the strategic road network, led to multiple areas of non-compliance with its licence conditions. These were demonstrated through the statutory consultations which failed to follow best practice; the transport assessment accompanying the DCO application which failed to meet the standard expected of a WebTAG compliant appraisal; the failure of the proposed scheme to conform with the principles of sustainable development; and finally through the EiP, the effectiveness and efficiency of which was compromised by NH's omissions and obfuscations. At the end of the EiP the ExA was still asking fundamental questions about NH's evidence, and new evidence that conflicted with NH's evidence was presented and left unscrutinised. The result is that neither the ExA nor the SoS have the information needed to weigh up the planning balance. The overall effect is to limit democratic involvement and accountability.

101 The ORR has recently identified that where projects fail to be delivered on time, most of the delays occurred during the development phase – before construction begins. Statutory planning processes were one of the four most prevalent risk factors. In our experience it is not the statutory planning processes, red tape or regulations which

⁷⁰ Road Investment Strategy 3 Our role and approach, May 2022, ORR, 3.4a and 3.4b
<https://www.orr.gov.uk/search-news/gearing-third-road-investment-strategy-ris3> ;
<https://www.orr.gov.uk/sites/default/files/2022-05/Road-Investment-Strategy-3-our-role-and-approach-2022-05-04.pdf>

have hindered the effectiveness of the A57 Link Roads DCO application and its EiP but NH's approach and behaviour towards consultation and the planning system. Any subsequent delay to delivery of the scheme - the scheme is at risk of missing its start of work commitment⁷¹ - can be laid wholly at NH's door, through its behaviour, its attempts to conceal the real effects of the scheme, its failure to engage robustly in discussions, its failure to have due regard to its legal duties and Government policy, its failure to plan within the appropriate strategic context.

102 These shortfalls in performance do not appear to be picked up when monitoring NH's performance. Although the key performance indicators (KPIs) test how well NH manages traffic on the SRN and how quickly it delivers its enhancement projects, they do not robustly test NH's role as the steward of the SRN's long-term future and integrity, fit to meet all the challenges of this century in a sustainable way⁷². For example, in the 2021-2022 assessment of performance, the focus is on individual project delivery with no mention of the strategic context of wider Government policy⁷³. Consequently, there does not appear to be a robust framework for monitoring all of the licence conditions.

103 Some of the non-compliance we have documented e.g. taking a piecemeal approach to addressing issues along a corridor instead of strategic long term planning, raise fundamental issues not only about the preparation of the RIS by DfT and of route strategies by NH, but also about the testing by DfT of potential projects as they pass through their development stages. The final stages for an NSIP - the statutory consultation and the DCO application - are deeply flawed. To have received holding objections from the statutory consultees in response to the 2018 consultation on the scheme, and to have not addressed those concerns before holding another statutory consultation smacks of both incompetence and disregard for standards of best practice. An effective approach would have been to address all the statutory consultees' concerns and to then seek public views before proceeding to a DCO application. Development of a NSIP should be front loaded with a WebTAG compliant transport appraisal and full environmental impact assessment available for public scrutiny before the formal DCO process is entered. The EiP would then be able to proceed as it appears to have been envisaged – to iron out technical issues with planning agreements. In view of what we have experienced we believe a review of all these processes is required and that monitoring of them should be more robust.

104 Two key areas are highlighted by the evidence we have presented - environmental issues and engagement with stakeholders, organisations and the public. Environmental impacts and objections on environmental grounds are a key risk to the achievement of

⁷¹ Annual Assessment of NH's Performance 2021-2022, ORR, July 2022, Table B11

⁷² Annual Assessment of NH's Performance 2021-2022, ORR, July 2022

⁷³ Annual Assessment of NH's Performance 2021-2022, ORR, July 2022

planning consents for road schemes⁷⁴ yet environmental issues are not addressed through the RIS and only at a late stage of the NSIP process when the DCO application is submitted. This means adverse impacts are only picked up very late through a process which is not geared to addressing fundamental issues, only to tinkering around the edges. The entire programme being considered for RIS3 (whether carried over from RIS2, or new schemes) must be assessed within a Strategic Environmental Assessment as required by the Infrastructure Act 2015 and the Strategic Environmental Assessment Directive. Schemes should not enter the RIS unless they have been subject to a full and proper appraisal. Once chosen the options appraisal should be regularly reviewed to ensure the scheme remains the best performing, sustainable and cost effective option. The full environmental assessment and the transport appraisal on which it is based should be the subject of scrutiny through the statutory consultation, as we have noted above.

105 With respect to engagement there is no KPI. A review two years ago⁷⁵ of NH's engagement and cooperation with regional and local partners, but not the public or communities, concluded that *'Highways England is complying with the prescribed elements of its licence engagement duties but there is scope for further development of its duties to support regional and local stakeholders and manage their expectations'*. It specifically drew NH's attention to *'recognition of the obligations and priorities of local stakeholders, for example in areas such as decarbonisation and air quality'*. Through the A57 Link Roads, NH's response to stakeholders concerns was the reverse of the ORR's advice – it denied their significance and/or their legitimacy to be considered, of which the most extreme examples were to take no account of Greater Manchester's well developed approach to decarbonisation through radical changes in travel behaviour, or of the views of the statutory authority for the National Park, the PDNPA. Our experience also showed how poorly NH has failed to engage with communities and the public. Engagement must be formally addressed and monitored, as engagement worthy of a public body applies to all elements of the licence. The ORR has promised to review assessment of engagement as part of NH's RIS2 and RIS3 plans⁷⁶ but this should be extended to cover community and the public's engagement in project development.

106 NH receives huge sums from the public purse - in financial year 2020-2021, it spent £160,527,000 on staff and £3,198,000 on consultancy fees⁷⁷ - and is responsible for spending the £24billion committed to the 2020-2025 roads' programme. For that the public would expect NH's performance to at least meet the requirements of the licence, if not the extra mile, and for robust monitoring of that performance.

⁷⁴ Road Investment Strategy 3 Our role and approach, May 2022, ORR, para 3.50

⁷⁵ Review of Highways England's engagement approach with regional and local partners, June 2020,

⁷⁶ Road Investment Strategy 3 Our role and approach, May 2022, ORR, 3.71c

⁷⁷ Highways England Annual Accounts and Reports 2021

107 With respect to the A57 Link Roads we therefore urge the ORR to assess NH's performance in the light of this representation to you and report its findings to the SoS before he makes a decision on the scheme in mid-November 2022. More generally we urge the ORR to enforce behaviour that is expected of a public body and to review the overall monitoring of NH's licence. In particular, we suggest that the ORR a) reviews development of DfT's RIS and NH's route strategies to ensure that schemes that arise from them meet all the criteria for sustainable development, especially with regard to the climate and nature crises; b) insists on, or provides, much more robust assessment and monitoring of scheme development from options appraisal through to project business case; and c) reviews or instigates a review of the complete NSIP process.

APPENDIX A

OMISSIONS AND MISREPRESENTATIONS IN 2020 STATUTORY CONSULTATION

- a. There was no transport assessment, traffic data or traffic modelling results; this despite the SoCC p5 promise of *'more information about key environmental impacts including air quality, noise and traffic.'* Later when presenting draft traffic information to the local authority steering group NH⁷⁸ *'confirmed this was the data presented within the Preliminary Environmental Information Report (PEIR)'*. No traffic data was presented in the PEIR or available to the public until the DCO application was submitted.
- b. There was no mention in any of the documents of the impacts of increased traffic, all generated by the scheme, on Glossopdale. This would lead to rat running on residential streets to avoid congestion on the A57 through Glossop. People were unaware that, with the scheme, the walk or cycle to school, work or the shops would become more intimidating, dangerous and unpleasant; congestion would increase journey times for drivers within Glossopdale; road crashes would increase. The FAQ gave the opposite impression. *'Will the scheme create traffic in other areas? What about Glossop?'* was answered as *'Our traffic assessment shows that overall, the scheme draws traffic on to the strategic road network and off local roads. Therefore we wouldn't expect to see a significant increase in traffic through Glossop during peak times.'* This misrepresentation was only revealed through the EiP.
- c. The infrastructure for the scheme lies within the National Park setting and ~2km from its boundary. There was no mention of the increased traffic on trans-Pennine routes through the National Park or its impacts on tranquillity, wildlife and road crashes, again all only revealed through the EiP.
- d. The whole scheme lies within and crosses the Green Belt yet the word Green Belt appeared only once in - PEIR Vol 3 with respect to the Planning Act 2008. There was no mention of the strict policies surrounding Green Belt, no map of the Green Belt, no mention of the scheme's profound impacts on four of the five functions of the Green Belt and its harm to openness, as revealed by the EiP. Of all planning policies, Green Belt is the best known, best loved and best understood by the general public but it was completely excluded from all the consultation documents.

⁷⁸ APP-026 Consultation Report [Table 3-2] accompanying the DCO application, published July 2021

- e. Safety was only addressed in the FAQ where a misleading impression was given. Improving safety for road users was described as a key objective of the A57 Link Roads, but there was no such objective. Safety benefits improvements were implied: *'Our traffic assessment shows the scheme reducing accidents across the local area, because traffic will be moved onto more modern roads.'* There was no mention of the increased risk of road crashes in Glossopdale and on trans-Pennine routes which came to light in the DCO application.

- f. The economic justification for spending £225m (later reduced to £180m) on the scheme was not made. The statement in the brochure that congestion *'restricts potential economic growth, as the delivery of goods to businesses is often delayed and the route is not ideal for commuters, which limits employment opportunities'* was not informed by evidence.

- g. The colour brochure showed prejudicial bias. It focused to the exclusion of all else on the immediate benefits to residents in Mottram and on Woolley Lane and on the engineering and design changes made since the 2018 consultation. There was no mention of Glossop as a township that might be affected by the scheme – the word Glossop appeared only twice in the brochure to explain that the *'Glossop bound'* traffic would be separated. There was not a single mention of GHG/carbon emissions despite the all-pervasive climate emergency and the fact the scheme would increase these emissions. There was no mention of road safety or of the adverse impacts on the Green Belt. With more pressing issues such as the Covid pandemic on people's minds, the brochure is likely to have been the only document the majority would have read. Its systematic distortion and concealment of the scheme's effects misinformed people as to the effects on their well-being and quality of life.

APPENDIX B

OMISSIONS AND FLAWS IN TRANSPORT ASSESSMENT REPORT

a. Traffic modelling – No details appeared in the TAR. In three and a half pages it named the modelling software and used three figures to show the modelled area and local zone disaggregation. There was no local model validation report, no forecasting report, no options report, no strategic case report, no economic case report, no appraisal summary table.

(i) Assumptions and factors which were built into the model and the values ascribed to these factors were not available to stakeholders or to the ExA.

(ii) No information was available as to how public transport, walking and cycling were dealt with in the model. Late in the EiP NH revealed that only rail trips for households with a car were included. NH continued to confuse the definitions between rail, public transport as a whole, trips which were included or not included in the model and in fact how the limited rail modelling was undertaken [REP9-040, Q3.4, page 5].

(iii) The source of errors in terms of model parameters and specification were concealed from the EiP. NH stated⁷⁹ they were captured in the high and low growth sensitivity tests but provided no details.

(iv) The impacts of the scheme on transport networks in Greater Manchester, despite the majority of journeys being within it, were not presented. Later NH revealed that the scheme was treated as an isolated bypass with limited access to Greater Manchester, with a fixed cost function and masking applied to Greater Manchester within the model.

(v) Data from various sources was used to calibrate the model but how it was applied was not fully explained or given in sufficient detail. Conflicting statements were made about updating the model⁸⁰.

(vi) Inconsistencies in the outputs from the model remained unexplained at the end of the EiP on a number of routes through and within Glossop, Hadfield and Padfield, and along the A628T⁸¹. NH dismissed IPs' attempts to understand these as mistaken⁸² but failed to supply

⁷⁹ REP11-010, 3.3. NH response to ExA's Third Written Questions

⁸⁰ APP Data was collected during 2020-2021 according to the Case for the Scheme 4.3.5 and 4.3.6 for model development. NH refuted this and said only 'historic' data was used REP9-027/9.79.111

⁸¹ REP8-034, 9.69.16; REP9-043; REP10-012, pp 2-3

⁸² REP9-043 Response to PD-014 - Report on Implications for European Sites

a valid explanation for the majority of these or to provide specific data to validate its arguments.

(vii) The EIA Regs Schedule 4 para require *'a description of the relevant aspect of the current state of the environment (baseline scenario)'*. This is essential to understanding the current traffic situation and how it would change with the scheme. With the impact of Covid 19, the most recent actual traffic flows would be 2019. Instead NH used traffic surveys from 2015-2016 and modelled them to create the 'do minimum' scenario in 2025 against which to test the impacts of the scheme. This is not a 'current baseline' and led to a number of discrepancies when comparing the 2025 'do minimum' with existing counts from the DfT traffic website – some flows were much greater, others much lower.

All the above led to enormous problems with understanding the outputs from the traffic model.

b. Road crashes – The TAR, like the consultation documents, maintained there would be *'reduced safety risks within the built up area...'* (TAR Executive Summary). The built up area includes Glossopdale where High Peak Borough Council's Local Impact Report [REP2-046] showed an increased risk of road crashes on residential roads in Glossop. NH excluded from assessment residential roads on *'which the scheme is not expected to have an impact'⁸³*, roads which we now know through the EiP process, and which NH knew when it submitted the DCO documents, would have more traffic as a result of the scheme and therefore more crashes. The evidence presented in the TAR is the shockingly poor Figure 7.8 of the spatial distribution of safety impacts (the scheme incurs a safety disbenefit of -£7.32m over 60 yrs) which is too crude to decipher in the built up areas.

c. Severance – the word does not appear in the TAR. In Environmental Statement (ES) Ch12 NH's concern is wholly with severance of land holdings and reducing community severance on the bypassed A57T⁸⁴. Nowhere is NH concerned with the severance experienced by those attempting to cross the A628T in Hollingworth or Tintwistle (despite the *'high number of pedestrian accidents'⁸⁵*), the A57 through Glossop or residential roads in Glossopdale where traffic generated by NH's scheme would increase.

d. HGVs –The high percentage of HGVs along the trunk route subjects people, communities and the fabric of buildings adjacent to the road to severe impacts. The TAR barely addresses the issues⁸⁶. The scheme removes HGVs from part of the A57T but not from the A628T through Hollingworth and Tintwistle or from the A57 through Glossop. Yet the TAR does not

⁸³ TAR Figure 3.8 The Case for the Scheme 4.5.2;

⁸⁴ ES Ch. 12. 12.9.84

⁸⁵ Trans-Pennine Routes Feasibility Study 2015, Stage 1 Report 1.2.11

⁸⁶ TAR 1.1.2, 3.7.14 HGV percentages and numbers are given in Table 3.8 and Figures 3.6, 4.8, 7.1, 7.2, 7.5 and 7.6.

address their potential diversion to avoid congestion along these routes, or the severance, the intimidation, the risk of road crashes, the disincentive to walk or cycle on these routes that HGVs impose. NH's only concern is for the small length of the trunk road that would be bypassed. This is in direct contradiction to NPSNN's insistence at para 5.202 that impacts on local road networks must be taken into account.

e. Journey time savings – The TAR spells out the importance of journey time reliability (para 1.1.1), which features in the scheme's objective for connectivity (para 1.2.1), and provides monetised benefits worth £11m (para 7.2.6). Despite their significance, journey time savings were presented only as partial parts of journeys, not actual journeys the travelling public would make. Journey time savings on the SRN between Manchester and Sheffield were given for a 10-mile stretch of a 40-mile journey between the city centres and avoided the congestion that would be met within both urban areas. NH's main argument was to claim¹³ that journey times are captured in the modelled road network, which is no substitute for presenting specific evidence. The reason for NH's resistance became clear when it revealed Sheffield to Manchester journey time savings as ~5 minutes [REP5-022, 9.54.64]. This answer meant that claimed city-to-city journey time savings would be significantly reduced - for the 10-mile stretch eastbound savings were predicted as 8-10mins and westbound as 5-6mins – which would substantially reduce the value for money of the scheme and hence the Benefit Cost Ratio.

f. Public transport – There was no assessment of the potential for car journeys to switch mode to public transport, or of the time delay that would be experienced by bus passengers on routes which would see increased traffic. In TAR 3.4.11 NH claimed bus services '*will benefit from improved journey times and reduced congestion*'. This was revealed as a misleading assertion without evidence; in response to the ExA's questions⁸⁷ NH admitted it had not assessed bus times. Bus journey times should have been supplied in the TAR. When they were finally supplied [REP6-017 Appendix A] some improved and some took longer with the scheme.

g. Impacts on Glossopdale – we have detailed these above. The TAR referred only to journey times from Glossop (para 7.1.16) and to '*small increases in accidents through Glossop*' (para 7.2.13), by implication on the A57. Repeated requests for a proper assessment using a local model were refused, despite the requirements of NPSNN 4.2.

⁸⁷ REP7-020 Response to ExA's Written Questions, question 3.14, pp 28-29

APPENDIX C

WITHOLDING OF CRUCIAL EVIDENCE DURING EXAMINATION OF DCO APPLICATION

a. Assessment of public transport

This was important in view of the strong policies in Greater Manchester for radical reduction of car trips and increased travel by public transport, walking and cycling. In order to understand how NH had assessed travel by all modes it was necessary to know how the traffic model dealt with this. This was not disclosed by NH until 5th April Issue Specific Hearing (ISH) despite constant reference to public transport in our emails, at technical meetings, and through requests for clarification. When we first asked NH in July 2021 how public transport was included in the model, we were referred to the transport modelling and forecasting reports submitted with the DCO. As stated above (Appendix B a.) there were no transport modelling or forecasting reports submitted with the DCO, only the TAR which told the reader nothing about how public transport was assessed. Furthermore neither the Transport Modelling nor Transport Forecasting Packages⁸⁸ supplied to us in November 2021 contained that information. Despite two meetings with NH, we were still asking for clarification in March 2022. To aid progress MTRU asked NH to confirm our understanding with a suggested statement for us to agree with NH within a SoCG: *“The model contains public transport trips by people who have a car available but not by other users. In addition, only trips with either an origin or destination in the Area of Detailed Modelling are actively modelled. All other public transport trips are fixed.”* We received no reply and were only answered orally during the ISH on 5th April and by writing [REP8-018 page 55]. However, even that answer contained obfuscation as there were apparently two traffic models for the scheme – a regional mode choice transport model to forecast mode shift and a traffic model.

b. Review of appraisal options

(i) In order to establish if the scheme continued to be the best option since it was chosen in 2015, it was important to establish if a strategic level re-assessment of options had been undertaken since the original sifting of options in 2015⁸⁹. The Treasury’s Green Book 2020 advises that options should be checked at each stage of the Business Case process, updating of the appraisal options is expected for all schemes in the RIS⁹⁰, and since 2015 addressing the climate and nature crises has become urgent. Another strong reason for review was the lack of a suitable traffic model for the 2015 Study. As a result the Study noted (Stage 3

⁸⁸ REP2-090 – Transport Modelling Package pdf pp 98/790; Transport Forecasting Package pdf page 256/270;

⁸⁹ A57 Link Roads 6.3 ES Chapters 1-4 Introductory Chapters Planning Inspectorate scheme reference: TR010034 Application document reference: TR010034/APP/6.3 para 3.3 Page 97 of 134

⁹⁰ RIS1 2015-2020 para 2.12; Treasury Green Book November 2020

Report 4.2.17) there is *'a risk that forecasts developed using a new traffic model may differ from those produced as part of this assessment.'*

(ii) NH's answers when questioned on this matter were changeable. It first confirmed in August 2021 *'that we have not repeated the Early Appraisal Sifting Tool (EAST) since finalising the options in 2015'*. It then used timing as an excuse not to undertake the review - *'The updated Green Book postdates consideration of alternatives to the Scheme and selection of the preferred option'⁹¹* - ignoring the fact that the need for review continues after selection of the preferred option. When questioned by the ExA, NH then claimed it had undertaken a review, using changes to design or exclusion of certain elements⁹² which is not what a strategic review of the options appraisal is about. When challenged on that argument it reverted to its original position of not having undertaken a review because *'it would not be practicable'⁹³*. We therefore concluded that NH had not undertaken a review as required by RIS and the Treasury Green Book. Trying to show it had undertaken the required review when it had not emphasised how poorly NH has followed procedure and how it sought to conceal this from the EiP.

c. Explaining the spurious traffic data

(i) The outputs of the traffic model, i.e. the predicted traffic flows and their distribution, nature and composition, were fundamental to all the evidence about the scheme's effects on the transport networks, on road safety and on the environment, society and the economy. Clarity is required on both the model's limitations and its outputs. Our lack of confidence in the modelling and its results increased throughout the EiP, was shared by other interested parties (IPs), and was comprehensively expressed through a joint letter to the ExA [REP10-017]. It was also shared by the Peak District National Park Authority⁹⁴ and by High Peak Borough Council⁹⁵.

(ii) Initially NH relied on blanket statements that it had absolute confidence in the traffic modelling, which is no substitute for open, comprehensive and consistent presentation of data and for engaging with challenges constructively. Later it described the process in some detail but the outputs – the spurious and extraordinary traffic modelled results - were not explained. It persisted with addressing questions about content with answers about methodology. It used arguments that did not withstand scrutiny and, when challenged, provided the same arguments. It failed to engage with substantive evidence submitted by us and others, and provided vague and unintelligible answers to questions. This severely impeded understanding of the traffic data and the scheme's impacts and led to the ExA asking serious questions about the traffic modelling even as the EiP closed.

⁹¹ REP7-025, 9.69.8

⁹² REP8-019, 9.75.34

⁹³ REP10-010, 9.84.13

⁹⁴ REP2-048 Local Impact Report 7.2.1

⁹⁵ REP2-046, High Peak Borough Council Local Impact Report, 19.1

(iii) Three working days before the EiP closed, NH supplied some explanation as to the disparities between some of the DfT observed traffic flows and modelled traffic flows in the 'do minimum' 2025 scenario [REP11-010, 3.1 page 13]. These explanations exposed local zone limitations as the cause of some of these disparities. These limitations are a good reason for using a more defined model of Glossopdale, something we and others had repeatedly requested throughout the EiP and been denied, and which NPSNN 4.2 requires.

(iv) Public interest in the integrity of the traffic modelling was extremely important for this scheme. The 2007 public inquiry into the Mottram-Hollingworth-Tintwistle bypass (the previous iteration of the scheme) was formally adjourned in December 2007 after 10 days of hearings due to serious flaws and repeated errors with the traffic model. Revised traffic figures due to an error in the traffic modelling were followed by further inconsistencies in feeding data into the traffic model⁹⁶ which ultimately rendered the results of the model null and void. The statutory consultees were unable to validate the traffic model and the public inquiry was formally closed in March 2009.

d. Uncertainty Log

NH's failure to engage constructively is also well demonstrated by its approach towards our challenge of the Uncertainty Log. In our written representation [REP2-069 4.2.11-4.2.17] we raised issues about the Uncertainty Log with respect to future development. A limited list was appended to the ES Ch.15 on Cumulative Effects. We found a much longer list in the Traffic Forecasting Package NH supplied to us [REP2-090, Appendix B, pdf pp 337/790]. We compared the results given in the DCO application documents with those available in the Traffic Forecasting Package, pointing out data was missing and asking for clarification on how the model had addressed future development. NH offered '*Details of the schemes and developments listed in the Uncertainty Log can be provided by National Highways if necessary*'. We responded '*As offered, please may we see the complete list, ie the long list and the short list, of schemes and developments excluded and included in the Uncertainty Log*⁹⁷'. NH responded⁹⁸ '*The uncertainty log is included in Appendices B & C of the Traffic Forecasting Report that has previously been provided by National Highways to CPRE*'. These were the very appendices which we had analysed in REP2-069 and to which we were seeking details and clarification. This circular game playing by NH was obstructive and did not address our concerns.

e. Investigation of Mottram Gyratory Flow (MGF)

⁹⁶ Mottram Tintwistle Public Inquiry 2007 HA-73 December 4th 2007; the Highways Agency announced that no more information would be available until late February 2008. It failed to meet this deadline and further deadlines in May 2008 and then October 2008.

⁹⁷ REP5-028, page 10

⁹⁸ REP7-025 9.69.18 page 14

One IP Mr Bagshaw presented the MGF as an alternative to the scheme. When asked by the ExA if the MGF alternative had been considered previously NH's response was an unequivocal 'No'⁹⁹. *'The Mottram Gyrotory Flow alternative presented in Mr Bagshaw's submission was not one of the alternative options considered by National Highways'...* *'The scheme previously proposed and presented in Mr Bagshaw submission was not one of the potential alternative solutions identified through this process'*. Towards the end of the EiP¹⁰⁰ the ExA was obliged again to ask NH to clarify its position as to whether the MGF, or a similar scheme was considered through options appraisal. The NH completely reversed its reply both orally at the hearing and in writing to a definitive 'Yes'. *'The option submitted by Mr Bagshaw was presented as an alternative scheme at the public inquiry of 2007. A scheme looking at a gyrotory system in the area of Mottram was assessed in 2015 as part of the EAST study; these were forwarded on to the DfT for consideration but were not included in RIS1¹⁰¹'*. Thus two directly contradictory answers were given by NH. Mr Bagshaw then showed that it had not been examined as a standalone option but only as an addition to the current scheme (REP8-042 para 5 pp 5-8).

f. Increase in vehicle kms

Both the TAR (7.2.9) and ES Ch.14 Climate referred to increases in vehicle kilometres generated by the scheme but no absolute figures were given. NH twice gave the opposite impression: *'Total vehicle kilometres across the appraised road network are effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic... and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys¹⁰²'*. Only in response to a question from the ExA, on 13th April (10 months after we originally asked for the figures) did NH reveal the increases in total vehicle kilometres due to the Scheme would be +0.7% (on approximately 12,000,000 daily veh-km in 2025) in the area of detailed modelling and +9.5% (on approximately 410,000 daily veh-km in 2025) in the Local Study Area¹⁰³. NH not only refused to supply the absolute figures to us but also denied there would any increase in vehicle kilometres.

g. A sensitivity test on the carbon emissions

NH submitted the results of the test but did not make the methodology of the test available¹⁰⁴. Nor did NH explain how the test affected the significance of the carbon emissions associated with the scheme. The validity of this test awaits DfT approval at some

⁹⁹ REP6-017 NH responses to ExA's second written questions Q3.8a

¹⁰⁰ REP8-019 Issue Specific Hearing 9.75.34 (kk) page 20

¹⁰¹ REP8-019 NH written summary of oral hearing 9.75.34 (kk) page 20

¹⁰² REP1- NH response to Relevant Representations RR-0543 page 147, 1st December; REP2-022 4.1 page 59

¹⁰³ REP8-019, 9.75.6

¹⁰⁴ REP5-026 2.2.5 onwards and Table 1; REP8-018 Appendix A

time in the future. Given this, it was incredible that this data was provided to the ExA as if it might add value to the ExA's recommendation to the SoS.

h. Visibility of the eastern portal of the underpass to the public

ES Ch.7, 7.9.25 implied that the eastern portal of the Mottram underpass would be visible from publicly accessible viewpoints. *'Views represented by Viewpoint 5 would be more open, with visibility of the new underpass structure and the cutting slopes present at the eastern portal'*. During site visits we searched from around Viewpoint 5 (on a public right of way) for visibility of the underpass structure but could not find it, and requested an accompanied site visit to view the eastern portal. In response NH considered *'that **all parts of the Scheme can be viewed from publicly accessible land, and thus we do not consider that an Accompanied Site Inspection will be required**¹⁰⁵'* (our emphasis). When we asked NH (email 22nd November) from where a full view of the eastern portal could be seen, it responded (21st December 2021) *'the only views of the eastern portal would be visible from private agricultural land containing no sensitive receptors'*. This is a complete contradiction to *'all parts of the scheme can be viewed from publicly accessible land'*.

i. Godley Green Garden Village (GGGV)

(i) GGGV is the largest proposed development within Greater Manchester, is included in Greater Manchester's emerging spatial framework Places for Everyone and would lie 1Km from the scheme on a road that joins the M67 J4 roundabout, at the western end of the scheme. The allocation is proposed to deliver 2,350 dwellings and would generate approximately 529 to 1,057 two-way vehicle trips during peak hours¹⁰⁶. Clearly this is a major development which would interact with the scheme. NH's approach towards the scheme's interaction with GGGV provided two diametrically opposed stances.

(ii) NH's assessment¹⁰⁷ for the DCO application records *'no significant cumulative effect'* as a result of the scheme with the GGGV development, a conclusion which is directly contrary to the Places for Everyone assessment in which NH participated. The latter records that traffic generated by this allocation is *'likely to result in material implications on the operation of the SRN that would require mitigation*¹⁰⁸ *'* at both the M67 J4 roundabout and M60 J24

¹⁰⁵ PDL-001 Letter dated 1st November 2022 to ExA regarding the Preliminary Meeting of the Examination

¹⁰⁶ 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

¹⁰⁷ ES Ch.15 Table 15-7 row 42

¹⁰⁸ 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

Denton Island¹⁰⁹ which lies 5-miles west of the scheme along the M67. Outside the EiP NH behaved as if the scheme would have significant effects: in response to TMBC's 2021 planning application 21/01171/OUT for GGGV, NH submitted a formal recommendation¹¹⁰ that planning permission is not granted for a specified period, as it did not have '*sufficient comfort that the development would not cause a detrimental impact to the SRN.*' The conclusions that NH reached in regard to the scheme's cumulative effects with GGGV are contrary to those evidenced by PfE and its own response to the planning application.

j. Transport for Greater Manchester's SOCG with NH

A prime example of delay is the handling of the SoCG between NH and TfGM. The initial version indicated TfGM was concerned with detailed design of traffic management [APP-192] but the second version in January 2022 briefly alluded to concerns about strategic planning issues [REP2-019]. The nature of the latter were not revealed until the next and final version of the SoCG appeared 4 months later during the final hours of the EiP [AS-010 and REP12-010]. Several new issues and new angles on known issues were disclosed as of concern to TfGM, all too late for scrutiny within the time frame of the EiP.

¹⁰⁹ 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

¹¹⁰ https://publicaccess.tameside.gov.uk/online-applications/files/9976136762C94B11142AEDBDD186C191/pdf/21_01171_OUT-CONSULTATION_RESPONSE_-NATIONAL_HIGHWAYS-1539049.pdf

Submission number: 14

Date submission received by PINS: 8 November 2022

Name: Guard It All Limited

From: [TRANSPORTINFRASTRUCTURE](#)
To: [Kate Atkins](#)
Subject: FW: TR010034 – A57 Link Roads
Date: 14 November 2022 14:59:30

Kate,

Apologies but this was missed off.

In addition, I have created a DCO – A57 folder, so please keep an eye on it as any future emails come in. I will drag and drop.

Shenaz

**Ms Shenaz Choudhary | Planning Casework Officer, Transport Infrastructure Planning Unit,
Department for Transport
1/14 | [REDACTED]**

From: mel.gard@guard-it [REDACTED]
Sent: 08 November 2022 14:16
To: TRANSPORTINFRASTRUCTURE <TRANSPORTINFRASTRUCTURE@dft.gov.uk>
Subject: TR010034 – A57 Link Roads

Dear Sirs

My family and I live at 8a Old Road Mottram and have done for the last 10 years. We are directly effected by the proposed Bypass.

It seems incredible that so little thought has been given to a scheme that mealy moves a problem along a couple of miles and thereby creates a vastly bigger problem to the long suffering residents of Hollingworth and Tintwistle and the routes to South Yorkshire.

By creating a bypass that slightly helps the residents of Hattersley, then creates a bottle neck further on which will be far worse than the existing problem by way of the increased heavy traffic and the increased traffic from the Glossop and High Peak areas resulting huge traffic problems on roads not meant to carry that volume.

It seems that again this scheme is just another very expensive stop gap scheme that benefits a few and ignores the majority.

Kind regards

Mel Matthews

Director

GUARD IT ALL Ltd

Head Office: Unit L- The Holt • St Paul's Trading Estate • Huddersfield Road • Stalybridge • SK15 3DN

Mobile: 07940 785 553 • **Tel:** 0161 303 7434 • **Email:** [REDACTED]

Personal Email: [REDACTED]

Website: [REDACTED]

This email has originated from external sources and has been scanned by DfT's email scanning service.

Submission number: 15

Date submission received by PINS: 10 November 2022

Name: Councillor Joanna Collins on behalf of High Peak Borough Council



The Rt Hon Mark Harper MP
House of Commons
London
SW1A 0AA

Dear Mr Harper

Re Decision on A 57 Link Roads due 16th November

I am writing to ask you to turn down the proposed changes to the A57 around Glossopdale and Longdendale.

Building these roads would take traffic away for some parts of Glossopdale, but would cause increased congestion and pollution in others. The project would increase traffic by up to 38%, according to Highways England's own data, and would therefore increase emissions of greenhouse gases and other pollutants, detracting from the UK's legally-binding net zero target. Traffic would increase along the A57 Snake Pass, where there were serious road slips last winter. It does not seem logical to encourage more traffic along such an unstable road.

The project would cost in the region of £180 million, at current estimates, for no obvious benefit to more than a few roads in Glossopdale. The plan has a benefit-cost ratio of 1.45 and so is in the Government's 'low value for money' category. A recent report commissioned by the CPRE, Low Carbon Travel for Longdendale and Glossopdale, outlines more sustainable alternatives to the proposed link roads, costing just £10 million and with a benefit-cost ratio of 4.99, i.e. 'very high value for money'.

Surely the Government could not justify expenditure of £181 million to so little benefit, when there are very much cheaper alternatives available, the day before the Government is due to announce cuts to essential public services such as schools and social care.

Yours sincerely

Councillor Joanna Collins
Representing Hope Valley Ward on High Peak Borough Council.

Submission number: 16

Date submission received by PINS: 11 November 2022

Name: K Moss

From: [LouandKeith Moss](#)
To: [POCorrespondence](#)
Subject: FW: there is a Solution to save £ 170M from the Mottram A57 road scheme Manchester to Sheffield . Tell the Chancellor
Date: 11 November 2022 17:54:19

Sent from [Mail](#) for Windows

From: [LouandKeith Moss](#)

Sent: 11 November 2022 17:36

To: [REDACTED]

Subject: there is a Solution to save £ 170M from the Mottram A57 road scheme Manchester to Sheffield .

I refer you to the green solution that would enable you to [Reject the Proposed A57 Link Roads Scheme - Action Network](#).

As locals we experience congestion travelling on Mottram Moor as Robert Largan MP will tell you. Relief on the main road from M1 to Manchester through Woodhead pass and past Glossop would help. However, the proposed scheme at enormous expense – even as declared by National Highways does not relieve the bottleneck at Tintwhistle , reduce the pollution and nor will a proposed Glossop spur relief road (to improve access because of a bottleneck bridge) help as the likelihood is that traffic from Sheffield may be more persuaded to travel over Snake pass if the journey time is perceived to be shorter than currently to congest Glossop high street even further than is the case now.

There is already too much infill housing without infrastructure /levelling up support and the pockets on the edge of the proposed scheme if approved will encourage even more infill development that would itself add to traffic . Already we need major INFRASTRUCTURE INVESTMENT to ease the high street gridlock.

Hence the GREEN plans for adding the Gamesley RAIL STATION – which would ease local commuter traffic seeking other stations on network /

Approving the Manchester Oxford Road rail station platform UPGRADES THAT HAVE BEEN designed/ costed and are ready to start – which will enhance the Sheffield line cross country links

Investing in low fare bus linkages e.g. Derbyshire/Manchester bus pass compatibility etc

All could be started swiftly at modest cost – any grander road schemes could wait for after the recession –when work life balances may be more environmentally appropriate

who knows home working

4 day weeks etc

Lorry restrictions

20 mile an hour zones

Bus stop laybys and priority routes

Cycle ways

Elec/hydrogen cars

Regards

K Moss

Sent from [Mail](#) for Windows

This email has originated from external sources and has been scanned by DfT's email scanning service.

Submission number: 17

Date submission received by PINS: 11 November 2022

Name: CPRE PDSY

From: Anne Robinson [REDACTED]

Sent: 11 November 2022 18:35

To: 'A57 Link Roads' [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: A57 Link Roads - TfGM's response to the Secretary of State's invitation on 1st November 2022 to respond to National Highways response of 31st October 2022

Unique Reference: 20029243

Dear Secretary of State

We have read the latest submissions to the A57 Link Roads determination and note Transport for Greater Manchester (TfGM)'s response. It states that the Places for Everyone evidence is illustrative, and that in 2025 there would have been no build-out of Godley Green Garden Village. It did not address the build-out in 2040. Also, that the Systra document (although it is not explicit it appears to be referenced in the second para up on the penultimate page) is a policy off 'worst case' scenario. This is precisely why we wish to see it. National Highways' traffic model was also a policy-off (with respect to TfGM transport policies), supposedly 'worse case' scenario but had major discrepancies and inconsistencies. The Systra work would give us an independent alternative valid analysis against which to compare the A57 Link Roads traffic modelling results. TfGM have ignored that point.

TfGM chose not to be an Interested Party and only to engage with the Examination via a Statement of Common Ground (SoCG) with National Highways. The first two versions dealt with minor details of scheme layout (June 2021 and Jan 2022). Only in the final version of the SoCG submitted 3 days prior to closure of the Examination on 13 May 2022 was there any substantial evidence, none of which was available for proper scrutiny. For example, the Greater Manchester carbon emissions prepared by National Highways were supplied only to TfGM and on request to us post-examination but not to other Interested Parties.

Therefore, we believe that Interested Parties should reasonably be afforded the time and opportunity to consider any new documentation or material referred to by TfGM so as to be able to fairly answer to the claims of what would be a new Interested Party at the Examination (and Consultation).

Please note this request is endorsed by Peter Simon, Unique Reference number A57L-001, who shares our concerns.

Regards

Anne

Anne Robinson

Campaigner

CPRE Peak District and South Yorkshire

[REDACTED]
[REDACTED]

a: Victoria Hall, 37 Stafford Road, Sheffield, S2 2SF



Run and managed by CPRE Peak District and South Yorkshire. Reg. Charity No 1094975. Reg. Company No 4496754.

This e-mail is confidential and may well also be legally privileged. If you have received it in error, you are on notice of its status. Please notify the sender immediately by reply e-mail to and then delete this message from your system. Any review, dissemination, distribution, copying or other use is strictly prohibited. Any views expressed in this message are those of the individual sender and may not necessarily reflect the views of the Campaign to Protect Rural England (CPRE) or its associated companies.

This email has originated from external sources and has been scanned by DfT's email scanning service.

The information in this email may be confidential or otherwise protected by law. If you received it in error, please let us know by return e-mail and then delete it immediately, without printing or passing it on to anybody else.

Incoming and outgoing e-mail messages are routinely monitored for compliance with our policy on the use of electronic communications and for other lawful purposes.

Submission number: 18

Date submission received by PINS: 11 November 2022

Name: CPRE Peak District and South Yorkshire



The countryside charity
Peak District and
South Yorkshire

Simon Case,
Cabinet Secretary and Head of the Civil Service,
The Cabinet Office,
London, SW1A 2AS

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dear Simon Case,

11th November 2022

CPRE PDSY is writing to you because of our mounting concern that the DfT may not be taking proper regard of the procedural failings by National Highways with regard to its plans for the proposed A57 Link Road. As a consequence, Ministers may not be properly advised that there is no sound basis to approve the Development Consent Order (DCO), so that any DCO approval would be liable to legal challenge.

We have made extensive representations about this including to National Highways, to DfT and to incumbent Secretaries of State for Transport; on 27th August 2022 to Grant Shapps MP; on 27th September and 23rd October 2022 to Anne-Marie Trevelyan MP; on 26th October to Mark Harper MP - most recent correspondence attached. This sets out in detail the significant procedural failings regarding this matter which in our view fatally compromise the ability of Ministers to take a properly founded decision on this matter at this time, as required by the Planning Act 2008 s.104 (7) and the 2017 EIA Regulations s.21 (1)(b). National Highways' noncompliance with its licence represents not only a serious malfeasance but also calls into question not only the integrity of the company but also the veracity of the evidence for the scheme. It demonstrates that the process through which the A57 Link Roads has passed has been both unlawful and encumbered by participatory unfairness making untenable any decision which might be made to proceed with the scheme.

For the avoidance of doubt, it is CPRE PDSY's view that any decision taken now to approve a DCO for this scheme would be so compromised by the significant procedural failings in the process in which it is based, that it would be liable to legal challenge.

We would be most grateful if you would consider our concerns. Given the seriousness of this matter, we would ask that if acknowledgment of receipt of this letter is sent by someone on your behalf, that it should explicitly acknowledge that you have seen this letter and are aware of its contents. Many thanks for giving this your attention.

Yours sincerely,

[REDACTED]

Tomo Thompson
CEO

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire

for the countryside, for communities, for the future

[REDACTED]
Registered Charity No.1094975 Registered Company No. 4496754



The countryside charity
Peak District and
South Yorkshire

Cc: Mark Harper MP, Secretary of State for Transport
Louise Haigh MP, Shadow Secretary of State for Transport
Dame Bernadette Kelly, Permanent Secretary, DfT
Emma Ward, Director General, Roads, Places and Environmental Group, DfT

President: Dame Fiona Reynolds

CPRE Peak District and South Yorkshire

for the countryside, for communities, for the future

www.cprepsy.org.uk

Registered Charity No.1094975 Registered Company No. 4496754

Submission number: 19

Date submission received by PINS: 14 November 2022

Name: CPRE PDSY

From:**Subject:**

A57 Link Roads Flawed Business Case

Date:

14 November 2022 13:54:01

Attachments:[Outlook-4c4k1uct.png](#)[2022-7-26 CPRE PDSY to HMT re A57 Link Roads FINAL.pdf](#)[2022-8-25 CPRE PDSY report on National Highways Non Compliance with Licence.pdf](#)[2022-9-15 Low Carbon Travel for Longdendale and Glossopdale Summary.pdf](#)[2022-9-22 TR010034 Low Carbon Travel for Longdendale & Glossopdale CPRE PDSY.pdf](#)

Dear Chief Secretary to the Treasury

Please find attached a letter to you regarding the flawed business case for the A57 Link Roads.

In view of the current economic circumstances and with a renewed sense of urgency we ask you to withhold funding for the A57 Link Roads as its business case has been shown clearly to be flawed. The strategic case and rationale for the scheme have not been made, the scheme fails to meet its objectives and address the problems along the trunk route, and formal appraisal of the scheme has been deficient and not followed the latest DfT guidance. National Highways has failed to undertake a review of the options as required by the Treasury Green Book. Therefore the scheme's value for money cannot be assured. National Highways should repeat its options appraisal using a strategic corridor approach taking into account the established national, regional and local policies for achieving healthy and sustainable travel, and our consultants' proposals set out in the attached report *Low Carbon Travel for Longdendale and Glossopdale*.

We look forward to hearing from you as to the outcome of the business case review for the A57 Link Roads.

Kind regards

Anne

Anne Robinson
Campaigner
CPRE Peak District and South Yorkshire

p:

a: Victoria Hall, 37 Stafford Road, Sheffield, S2 2SF



Run and managed by CPRE Peak District and South Yorkshire. Reg. Charity No 1094975. Reg. Company No 4496754.

This e-mail is confidential and may well also be legally privileged. If you have received it in error, you are on notice of its status. Please notify the sender immediately by reply e-mail to and then delete this message from your system. Any review, dissemination, distribution, copying or other use is strictly prohibited. Any views expressed in this message are those of the individual sender and may not necessarily reflect the views of the Campaign to Protect Rural England (CPRE) or its associated companies.

This email has originated from external sources and has been scanned by DfT's email scanning service.



The countryside charity
Peak District and
South Yorkshire

John Glen, MP
Chief Secretary to the Treasury
1 Horse Guards Road
Westminster
London SW1A 2HQ

[REDACTED]
[REDACTED]
Tel: [REDACTED]
[REDACTED]

14th November 2022

Dear Chief Secretary to the Treasury

A57 Link Roads Flawed Business Case

In view of the current economic circumstances we write with a renewed sense of urgency to ask you to withhold funding for the A57 Link Roads as its business case has been shown clearly to be flawed. The strategic case and rationale for the scheme have not been made, the scheme fails to meet its objectives and address the problems along the trunk route, and formal appraisal of the scheme has been deficient and not followed the latest DfT guidance. National Highways has failed to undertake a review of the options as required by the Treasury Green Book. Therefore the scheme's value for money cannot be assured. National Highways should repeat its options appraisal using a strategic corridor approach taking into account the established national, regional and local policies for achieving healthy and sustainable travel, and our consultants' proposals set out in the report *Low Carbon Travel for Longdendale and Glossopdale*.

1. Background

The A57 Link Roads Project, a short bypass of a congested cross-roads, is a Nationally Significant Infrastructure Project (NSIP) on the eastern edge of Greater Manchester. Examination of its Development Consent Order (DCO) was completed in May 2022. The Secretary of State for Transport must determine the scheme by 16th November 2022.

The Treasury Green Book November 2020, the version available to National Highways during the A57 Link Roads 2020 statutory consultation, provided trenchant criticism of scheme appraisal and highlighted that the strategic case for many infrastructure proposals is weak¹, leading to significant flaws in appraisals and business cases. Specifically, business cases frequently do not demonstrate the necessary understanding of:

¹ Green Book Final Review 25th Nov 2020;



- the proposal's specific contribution to the delivery of the government's intended strategic goals (such as levelling up or net zero); and
- the specific social and economic features of different places and how the intervention may affect them;
- other strategies, programmes or projects with which the intervention may interact, including in a particular geographical area.

These shortfalls apply to the A57 Link Roads as the option chosen through the 2015 Trans-Pennine Feasibility Study² and led to the substantial shortcomings of the business case for the scheme, revealed through the DCO Examination. They are of such severity that a decision to proceed with the scheme would be untenable and funding should be withheld.

Below we examine these failings as follows:

1. Project not developed within a programme for its corridor
2. Failure to take account of strategies, programmes or projects with which the A57 Link Roads would interact
3. The flawed appraisal process
4. Scheme's Net Value to Society cannot be assured
5. Failure to review the Business Case
6. *Low Carbon Travel for Longdendale and Glossopdale.*

We refer to both the 2020 and 2022 version of the Green Book. All the DCO documents for the scheme appear on the PINS website³. References beginning REP or APP refer to documents in the Examination library⁴, which lists all documents accepted into the Examination and provides links to each one.

2. Project not developed within a programme for its corridor

'Proposals that are part of a larger programme need to be understood and appraised for public value and value for money in the light of their role in the overarching programme.' (Green Book 2020 Box 18; 2022 Box 18)

² Trans-Pennine Feasibility Study, Highways England & DfT, 2015 <https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports>

³ <https://infrastructure.planninginspectorate.gov.uk/projects/north-west/a57-link-roads-previously-known-as-trans-pennine-upgrade-programme/?ipcsection=docs>

⁴ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-000603-A57%20Link%20Road%20Examination%20Library%20Published.pdf>



National Highways ignored this approach and developed the scheme in isolation from the South Pennines road corridor (M60/M67 to M1) of which it is part. Development of the corridor programme has been broken into separate projects, assessed on their own merits and through individual business cases:

- (a) Major reconstruction of the M60 J24 is planned for 2025-2030⁵ to mitigate substantial congestion;
- (b) the A57 Link Roads is planned as a short bypass of Mottram;
- (c) a bypass of Hollingworth and Tintwistle, eastern extension of the A57 Link Roads, is being explored⁶ *‘To address congestion issues on the strategic A628 corridor and improve journey times and journey time reliability to South Yorkshire’*;
- (d) dualling of the A628T across the National Park with a short tunnel is being progressed by Transport for the North and National Highways.

Breaking up proposals into individual sections for appraisal (the so-called ‘salami slicing tactic’) was condemned by the Government Advisory Committee on Trunk Road Assessment (SACTRA) in the 1980s. Each of the above projects interacts with the others and may be independent of, complementary to, or compete with the other projects - 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. An individual project can only be shown to deliver its strategic objectives as part of the whole corridor. Improving the whole corridor will prove costly and other projects would provide better value for money, (see *Low Carbon Travel for Longdendale and Glossopdale* below). The A57 Link Roads Project should have been developed and assessed within a programme for the strategic route between the M60 J24 and the M1 J35a/J36, and within the context of the Peak District National Park and its nationally and internationally important environmental designations.

The Green Book (2020 2.28; 2022 2.4) supports this approach *‘Projects do not determine the need for a programme of which they are a part, nor do programmes do so for strategy, or strategic portfolios for policy. The justification of enabling proposals is the wider policy or programme or portfolio of which they are a part.’*

Contrary to the Green Book, the A57 Link Roads are determining the need for the programme (a, c and d above). The scheme would push the bottlenecks east and west along the trunk route, worsening congestion, noise and air pollution, carbon emissions

⁵ Transport Locality Assessment GMSF 2020 Table 13 Final list of interventions

⁶ Greater Manchester’s Transport Strategy 2040 Delivery Plan 2021-2026



and road crashes through the villages of Hollingworth and Tintwistle, and Glossop; negating investment in the safety and technology measures being implemented along the A628T [APP-185]; and increasing congestion at the M60 J24 (where the M67 joins the M60) by removing a bottleneck at the M67 J4 and pushing traffic west into a dense urban area and central Manchester.

For any eastern extension across the Pennines the A57 scheme would need to ‘join up’ with the next individual and as yet undefined stretch of road. The proposed scheme’s reintegration with the existing trunk route through a ‘super junction’ would then have completely different traffic patterns and probably lower traffic levels overall. It may even need redesigning. The economic benefits for this project would therefore have been seriously exaggerated. For all of the above reasons the South Pennines corridor must be looked at as whole, as the Green Book recommends, not piecemeal as in the case of the current scheme.

3. Failure to take account of strategies, programmes or projects with which the A57 Link Roads would interact

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.

National Highways failed to place the scheme in the context of current national⁷, subnational/ regional⁸ and local⁹ policies for transport and travel, for Net Zero GHG emissions and for the Peak District National Park. We briefly explore three examples.

(i) GMCA’s transport policies

National Highways ignored Greater Manchester’s Transport Strategy Right Mix policy, which aims for 50% of all trips to be made by public transport, walking or cycling by 2040¹⁰. The assessment of the scheme shows that the majority of total economic benefits (55%) lie with car trips which are entirely within Greater Manchester¹¹, which

⁷ Decarbonising Transport, DfT, July 2021 – half of all trips in towns and cities by walking and cycling by 2030; UK Net Zero Strategy Oct 2021; Bus Back Better National Bus Strategy for England 2020; NPPF 2021 para 104

⁸ Transport for the North’s Decarbonisation Strategy 2021; Greater Manchester’s Transport Strategy 2040 Right Mix vision - 50% by public transport walking and cycling, with no net increase in motor vehicle traffic, by 2040; South Yorkshire Mayoral Combined Authority’s Climate Emergency Framework - a 25% reduction in total travel demand by 2030; a 25% reduction in car miles by 2040; and a 30% reduction in freight miles by 2040; PDNPA Core Strategy Adopted 2011 Policies T1 and T2

⁹ DCC LTP 2011-2026

¹⁰ The updated GMCA Transport Strategy 2040 was published in Jan 2021 shortly after the A57 Link Roads second statutory consultation.

¹¹ Low Carbon Travel for Longdendale and Glossopdale pp

is fundamentally contrary to and undermines GMCA policies. Had these regional policies been taken into account, the scheme's benefits and its value for money would have been substantially reduced by the 'policy-on' reduction in car trips.

National Highways' approach is also contrary to GMCA's desire (and DfT's) to move away from a top-down projection of demand from the National Trip End Model, to using pluralistic scenarios with variation in demand which would link its spatial, economic and transport strategies to achieve a prosperous city that meets wider environmental and social goals¹². By completely ignoring these requirements, National Highways failed to integrate the A57 Link Roads with the transport planning that underpins GMCA's spatial planning.

(ii) Carbon emissions

Despite the 2008 Climate Change Act¹³ the scheme never had a carbon emissions reduction objective. Yet during its development reducing GHG emissions became urgent with the 2015 Paris Agreement¹⁴; the UK 2020 commitment to reducing GHG by at least 68% from the 1990 baseline by 2030¹⁵ as its contribution to the Paris Agreement; the 2019 declaration of a climate emergency by the UK government¹⁶ and many local and combined authorities¹⁷; and the 2019 amendment to the Climate Change Act 2008 to a legally binding target of net zero emissions by 2050. In addition all the relevant local and combined authorities expedited net zero carbon targets for earlier than 2050¹⁸. More recently the 2021 IPCC¹⁹ Sixth Report demonstrated accelerating widespread climate change; the 2021 October *UK's Net Zero Strategy Build Back Greener* reflected the urgency of addressing the climate emergency; and the Climate Change Committee advises that schemes which do not contribute to the carbon reduction pathway should not proceed.

¹² 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

¹³ UK Climate Change Act (2008) <http://www.legislation.gov.uk/ukpga/2008/27/contents>

¹⁴ <https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement>

¹⁵ UK of GB and NI's Nationally Determined Contribution, UK Government, 2020

<https://www.gov.uk/government/publications/the-uks-nationally-determined-contribution-communication-to-the-unfccc> ;

[55179008](#) 4th Dec 2020

¹⁶ <https://www.parliament.uk/business/news/2019/may/mps-debate-the-environment-and-climate-change/>

¹⁷ E.g. *Places for Everyone*, the Joint Development Plan for 9 of the 10 districts of Greater Manchester Aug 2021, para 1.52

¹⁸ Greater Manchester Combined Authority by 2038; South Yorkshire Mayoral Combined Authority by 2040; Barnsley MBC Net Zero 2045; and Sheffield City Council and High Peak Borough Council by 2030. Derbyshire County Council has aligned its emissions reduction pathway to the UK's NDC target. HPBC is aiming for the borough to be carbon neutral by 2030.

¹⁹ Climate Change 2021: The Physical Science Basis



Despite this robust policy framework for carbon reduction, the scheme is forecast to emit more than 401,000tCO₂ over its 60-yr appraisal and, crucially, would undermine programmes which support the carbon reduction pathway. National Highways' assessment of the carbon emissions did not reflect the new carbon values, which would lower the value for money, nor the key issue of the scheme's non-conformity with the carbon reduction trajectory in the DfT's Decarbonising Transport.

(iii) Peak District National Park

When planning the A57 Link Roads National Highways ignored the strong policies requiring trunk road traffic to avoid National Parks²⁰. It also failed to properly apply the statutory purposes²¹ of the National Park or its highest status of protection for landscape and scenic beauty²². It therefore failed to meet its legal duty under Section 62 of the Environment Act 1995 to have regard to National Park purposes.

There are therefore robust policy reasons to postpone the decision on the A57 Link Roads until National Highways has assessed the A57 Link Roads project as part of the South Pennines corridor programme and within the full policy framework.

4. The flawed appraisal process

The aim of the 2015 Trans-Pennine Feasibility Study²³ from which the A57 Link Roads emerged as the chosen option, was to reduce a congestion hotspot. No strategic case was made within the study and there were no objectives linking the proposals to government strategic policy priorities such as reducing climate emissions or increasing modal shift to active travel and public transport²⁴, as noted above. Consequently, there was no explanation of how the intervention would deliver the change required to meet these strategic objectives. With the lack of a strategic direction 'baked into' the appraisal process the narrow focus of the study led it to concentrate options on new road infrastructure for car and lorry travel. This is contrary to the Green Book (2020, para 2.11; 2022, para 2.3) *'Proposals should initially be considered from the perspective of the service needed to deliver the required policy outcome and not from the perspective of a preconceived solution or asset creation. This guards against thinking too narrowly or being trapped by preconceptions into missing optimum solutions.'*

²⁰ National Policy Statement for National Networks 5.152; English National Parks and Broads UK Government Visions and Circular; PDNPA Core Strategy policies T1 and T2

²¹ Environment Act 1995, Section 61

²² NPPF 2021 para 176

²³ Trans-Pennine Feasibility Study Scoping Document, Highways England & DfT, 2014

²⁴ National Policy Statement for National Networks 2014 paras 3.15-3.22; our letters to DfT



The first step in assessing options - long listing - which is designed to identify a range of options was fundamentally at fault. The webTAG key principles were not followed²⁵ and alternatives were not robustly tested, as required by the test of major development in a National Park²⁶. The study failed to maximise public transport, modal shift and smart choices, and minimise the need to travel, which would contribute to wider sustainability and health objectives, and fulfil Government policy²⁷. This has resulted in a scheme that increases car dependency and traffic, worsens congestion, leaves air pollution above the legal limit and increases carbon emissions and road crashes. In the context of the Treasury's 2020 and 2022 Green Book, the scheme's appraisal does not withstand scrutiny.

These shortfalls are indefensible. The 2015 Trans-Pennine Feasibility Study was preceded by extensive research in the DfT's 2008 Delivering a Sustainable Transport System (DaSTS)²⁸. The five overarching goals identified in DaSTS anticipated the requirements of the Green Book. As part of DaSTS, DfT commissioned the National Networks Trans-Pennine Connectivity Study to consider transport challenges between (and beyond) Leeds, Manchester and Sheffield. The study concluded that the transport mode with most scope for improvement in the trans-Pennine corridor between Manchester and Sheffield was rail²⁹ because of the environmental constraints imposed by the Peak District National Park.

Despite having a body of work which would have structured the appraisal, the 2015 Feasibility Study ignored the government's strategic goals, the specific social, environmental and economic features of the trans-Pennine corridor, and the strategies, programmes and projects with which an intervention would interact. The current scheme should be withdrawn and the transport issues in the area should be subject to an improved appraisal process as required by the Green Book.

5. Scheme's Net Value to Society cannot be assured

The Scheme has an initial BCR of 1.45 of 'low value'³⁰. Applying the most recent carbon prices to the economic assessment reduces the initial BCR to 1.33³¹. The

²⁵ webTAG Transport Analysis Guidance – The Transport Appraisal Process, Guidance for the Technical Project Manager, Jan 2014, para 1.1.5; see the CPRE PDSY letter 26-8-2014 and report submitted by MTRU to DfT

²⁶ National Policy Statement for National Networks 2014 para 5.147

²⁷ At the time, the National Planning Policy Framework 2012 paras 29 -41

²⁸ file:///C:/Users/anaer/AppData/Local/Temp/ldf_evidence_base_transport_delivering_sustainable_transport_system.pdf

²⁹ Trans- Pennine Feasibility Study Scope Document, Highways Agency & DfT, 2014

³⁰ APP-185 7.2 - Cost of scheme £181m; forecast benefits over 60yrs £156m from travel time savings, vehicle operating cost and user charge benefits of £181m; safety disbenefits of -£7m; an environmental disbenefit of -£18m; using the old values attributed to carbon; an indirect tax increase of £1m; delays during the construction period valued at -£1m.

inclusion of additional benefits forecast for the scheme - improved journey time reliability and wider economic impacts - gives an adjusted BCR of 2.45. This is even less reliable than the initial BCR, as it depends on assumptions which are partial and unreliable (which is why they are not in the main BCR) - full journey times were not provided, and the wider economic impacts are uncertain as they were assessed for a short project out with the corridor programme.

In this instance the value to society cannot be assured for the following reasons:

- Major unresolved inconsistencies in the traffic modelling remain post the DCO examination³². As the Environmental Statement relies on the integrity of the data and modelled results to give an accurate assessment of the scheme's impact on the environment, the scheme's impact on the environment is uncertain and may not be the 'worst case' as claimed by National Highways.
- Refinements were made to the model during development of the scheme to avoid air pollution at three locations - two of them AQMAs³³. The pollution was of such severity that it was considered that it would jeopardise development consent. These model refinement steps reduced the threshold for air quality assessment, which was not then undertaken in the two AQMAs.
- The impact of the scheme on HGV traffic demand, and on public transport, walking, and cycling were omitted from the assessment [REP7-034; REP8-033]. This only became apparent at a late stage in the DCO examination.
- A fixed cost function and masking were applied to the traffic modelling in the adjacent urban area which therefore failed to encompass the impacts on Greater Manchester, which receives and generates many of the journeys generated by the scheme.
- Uncertainty in modelling and forecasting was not addressed as required by the Green Book (2020 para 2.27; 2022 para 2.4 para 20/236). The DfT Uncertainty Toolkit has not been followed and the Uncertainty Log is incomplete in key areas.
- A WebTAG compliant appraisal was not presented with the DCO application. The Transport Assessment Report does not allow comprehension of the traffic effects of the scheme or provide sufficient evidence to test the impacts of the scheme against legal, policy and guidance requirements.

³¹ Low Carbon Travel for Longdendale and Glossopdale, page 48 with which National Highways concur.

³² [REP8-034; REP9-040; REP9-043; REP10-012; REP10-017]

³³ REP2-090 7.3.1 page 519/790

- Unmonetisable features, such as the impact on the Peak District National Park, have not been fully recognised in the assessment, as required by the Green Book (2020 para 2.27; 2022 para 2.4 para 20/236).
- The scheme failed to fulfil its objectives [REP9-042 pp 6-8; REP12-033 pp8-13³⁴].
- National Highways abused the NSIP/DCO process. The noncompliance with its licence demonstrated in the attached report represents not only a serious malfeasance but also calls into question the integrity of the company and the veracity of the evidence for the scheme. The report demonstrates that the process through which the A57 Link Roads has passed has been both unlawful and encumbered by participatory unfairness making untenable any decision which might be made to proceed with the scheme.

These inconsistencies, errors and omissions leave the risks for the scheme exposed. However, *‘The primary reason for implementing all proposals is not a Benefit to Cost Ratio (BCR) but is to meet the “business need” identified early in developing the rationale for the proposal, this takes place at the start of developing the strategic dimension of the business case’* (Green Book 2020 para 2.24; 2022 para 2.4 page 19/236). As we have shown above the rationale for the intervention was based on a false and parochial premise, and the evidence to secure the DCO is riddled with flaws. Therefore, the net value to society and the business case cannot be considered robust.

6. Failure to review the Business Case

Updating of the appraisal is expected by both (a) the Green Book and (b) the Road Investment Strategy (RIS). (a) *‘Programmes require a continuing process of review and alignment with policy objectives, to ensure that a programme and its projects remain linked to strategic objectives. This is because while they are implementing changes and improvements to business operations, they may need to respond to changes in external factors or to accommodate changes in policy objectives or strategies’* (Green Book 2020 3.11). (b) *‘The appraisal for these schemes will continue to be updated as the schemes develop. It is possible that some of these major schemes will as a result of further analysis of the economic, strategic and delivery cases be found to not be justified. In which case they would not be pursued and Highways England would have to explore other means of tackling the identified*

³⁴ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001553-CPRE%20PDSY%20-%20Other-%20CPRE%20closing%20position%20at%20D12.pdf>



problems³⁵. The need for review is emphasised by the policies and strategies described above that have emerged since the 2015 Feasibility Study, the majority published well in time to be considered as part of the framework for the scheme.

National Highways failed to review and align the scheme objectives in line with strategic objectives, and to undertake a review of the business case for the scheme. Its answers when questioned on this matter through the DCO examination were first to agree there had been no review of options, then to claim there had been [REP8-019, 9.75.34] and, when challenged again, to revert to its original position of not having undertaken a review because '*it would not be practicable*' [REP10-010, 9.84.13]. Despite the ambiguity created by some of their claims, it is now completely clear that National Highways has not undertaken a review as required by the Treasury Green Book and RIS.

7. Low Carbon Travel for Longdendale and Glossopdale

Low Carbon Travel for Longdendale and Glossopdale promotes a package of measures using the latest management techniques including a heavy lorry control system with sustainable travel measures. In outline it was proposed for assessment within the 2015 Study. It has been subject to extensive additional work by our own transport planning consultants and is now complete and attached. It has been subject to a local engagement process and directly addresses the problems identified along the trunk route³⁶. It meets the strategic objectives of the A57 Link Roads; is feasible and deliverable; and, at a cost of £10m compared to the scheme's costs of £182m, provides 'very high' value for money with an initial BCR of 4.99 using our central assumptions. It also avoids the adverse effects of the proposed A57 Link Roads and distributes benefits over a wide area, in particular bringing relief to other villages along the trunk route. It therefore represents an option that requires full and proper testing before proceeding to a scheme which increases road capacity.

In conclusion, we urge you to halt progression of the A57 Link Roads and reconsider the approach to transport and travel within the A628 Trans-Pennine corridor using a robust appraisal process.

Yours sincerely,



Anne Robinson, Campaigner

³⁵ Road Investment Strategy 1, 2015-2020 para 2.12;

³⁶ Except for maintenance and asset condition where technological improvements have already been made by NH



The countryside charity
Peak District and
South Yorkshire

cc. James Bowler, Permanent Secretary to the Treasury
Secretary of State for Transport
Dame Bernadette Kelly, Permanent Secretary, DfT
Emma Ward, Director General, Roads, Places and Environmental Group, DfT

NATIONAL HIGHWAYS NON-COMPLIANCE WITH ITS LICENCE CONDITIONS

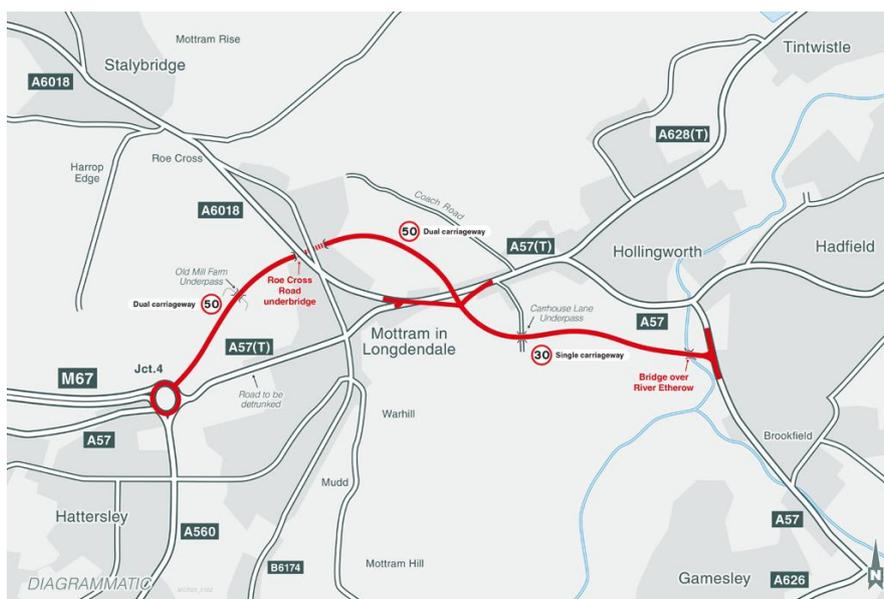
- 1 CPRE PDSY is a branch of CPRE, the countryside charity. We are also as the Friends of the Peak District, the National Park society for the Peak District National Park and a member of the Campaign for National Parks. We believe in a thriving, beautiful countryside, rich in nature and playing a crucial role in the response to the climate emergency. Our goal is a countryside that's valued, enjoyed and understood by, and accessible to, everyone, wherever they live. Through all our work we look at the role of our countryside in tackling the climate emergency, including seeking ways to increase resilience and reduce impact.
- 2 Through our engagement with Highways England/National Highways' (NH) plans for major road building impacting on the Peak District we have found that the company has not complied with several of its licence conditions, some of which are statutory directions. This relates particularly to the development and progression of its proposed A57 Link Roads¹. The non-compliance described below represents not only a serious malfeasance but also demonstrates that the process through which the A57 Link Roads has passed has been both unlawful and encumbered by participatory unfairness making any decision which might be made to proceed with the scheme untenable. As the Highways Monitor, we understand that the Office of Rail and Road (ORR) monitors National Highways' compliance with the statutory directions and regard to the guidance issued by the Secretary of State for Transport (SoS) in its licence. We are therefore bringing this non-compliance to your attention.
- 3 **With respect to the A57 Link Roads we urge the ORR to assess NH's performance in the light of this representation to you and report your findings to the SoS before they make a decision on the scheme in mid-November 2022. More generally we urge the ORR to enforce behaviour that is expected of a public body. In particular, we suggest that the ORR a) insists on, or provides, much more robust assessment and monitoring of scheme development from options appraisal through project business case, and b) reviews or instigates a review of the NSIP proposal and DCO process, for example in line with paragraph 29 below.**
- 4 The document is laid out as follows
 - (A) Background
 - (B) Behaviour unacceptable in a public body, Licence para 5.19, as demonstrated by
 - (1) Statutory consultations
 - (2) Transport Assessment Report
 - (3) NH's response to CPRE PDSY's requests for information

¹ The scheme appears in ORR's Annual Assessment of NH's Performance 2021-2022, Tables B4 and B11 <https://www.orr.gov.uk/sites/default/files/2022-07/annual-assessment-of-national-highways-performance-2022-print.pdf>

- (4) Examination of Development Consent Order (DCO) application
- (C) Failure to comply with statutory directions in the Licence, paras 4.1 management of Strategic Road Network (SRN), 4.2 general duties on Licence holder and 5.29 Government policy
- (D) Failure to have regard to guidance in the Licence, paras 5.15 and 5.23
- (E) Conclusions.

BACKGROUND

- 5 The A57 Link Roads (the scheme) developed as NH's favoured option out of the 2015 Trans-Pennine Routes Feasibility Study². It is a dual carriageway bypass of Mottram between the M67 and the A57T, continuing as single carriageway extension A57T to A57 to Glossop, which would effectively bypass part of the A57 called Woolley Lane (see figure below). National Highways (or Highways England as it was) held statutory consultations on the scheme in 2018³ and 2020⁴. (The scheme was called the Trans-Pennine Upgrade until 2020 when it became the A57 Link Roads.)



- 6 As a Nationally Significant Infrastructure Project (NSIP) the scheme's draft DCO was submitted to the Planning Inspectorate (PINS) on 28th June 2021, when all the application documents became publicly available, and was accepted for examination on 26th July 2021. The examination of the DCO application was conducted between 16th November 2021 and 16th May 2022. The Examining Authority (ExA)'s recommendations must be made by 16th August 2022 and the SoS's decision must be made by 16th November 2022.

² <https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports>

- 7 CPRE employed a professional transport planner, Keith Buchan of MTRU (Metropolitan Transport Research Unit), to develop our alternative proposals to the scheme for consideration through the 2015 Trans-Pennine Routes Feasibility Study and to give evidence to the Examination-in-Public (EiP)⁵. MTRU's engagement in the EiP led to consistent and expert challenge by a professional transport planner with extensive experience.
- 8 As a branch of CPRE we have had a 50 year history of engagement with the scheme in all its iterations. The evidence we present here is focused on our engagement with development of the scheme over the last 8 years; a comprehensive assessment of both the 2018⁶ and 2020⁷ statutory consultations which was submitted to the PINS as evidence of the inadequacy of the consultations; and full engagement as an Interested Party (IP) at the EiP into the scheme. We objected to the scheme on the basis that sustainable alternatives exist that should be trialled before unsustainable road building is pursued. We are not here concerned about the scheme and its impacts except in so far as they demonstrate non-compliance by NH.
- 9 All the DCO documents for the scheme appear on the PINS website⁸. References beginning REP, EV, APP, AoC or AS refer to documents in the EiP library. The library lists all documents accepted into the EiP and provides links to each one. See footnote for link to the Library⁹.

Framework for assessment of NH's performance

- 10 The expectations of NH run higher than the conditions of its licence. They are spelt out in the Foreword to the licence by the Minister for Transport at the time: *'Government remains responsible for strategic roads and Ministers will continue to be accountable for making sure that the network is managed responsibly, in a way that safeguards value for public investment, meeting the needs of road users, securing individual well-being and*

⁵ Our alternative package comprised exclusion of through-traffic of HGVs through the Peak District National Park, including on the A57/A628/A616T with sustainable transport measures.

⁶ <https://infrastructure.planninginspectorate.gov.uk/projects/north-west/a57-link-roads-previously-known-as-trans-pennine-upgrade-programme/?ipcsection=advice&ipcadvise=73c2ad0ecc>

⁷ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-Advice-00007-1-A57-Link-Roads-Email_Redacted.pdf On 24th May 2021 we submitted additional information to PINS about the inadequacy of the consultation which appears to have been removed from the PINS website but a summary can be found in REP2-069 Appendix B.

⁸ <https://infrastructure.planninginspectorate.gov.uk/projects/north-west/a57-link-roads-previously-known-as-trans-pennine-upgrade-programme/?ipcsection=docs>

⁹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-000603-A57%20Link%20Road%20Examination%20Library%20Published.pdf>

supporting economic purpose, both today and for future generations... This document represents a crucial part of that system, by setting out the Secretary of State's statutory directions and guidance to Highways England. It makes clear, to both Highways England and the wider community of road users and stakeholders, what we expect Highways England to achieve and how they must behave in discharging their duties and in delivering our vision and plans for the network, set out in the Road Investment Strategy.

- 11 *The Licence emphasises that the role of Highways England is about more than just complying with the letter of the law. We expect the company to go the extra mile in the way it engages with road users and collaborates with other organisations to develop shared solutions. And they must take a lead in promoting and improving the role and performance of roads in respect of broader communal responsibilities, such as the aesthetics of design, safety and the environment, as well as driving forward wider progress on technology and innovation.'*
- 12 In addition the baseline standard of the Seven Principles of Public Life (the Nolan Principles) applies to anyone who works as a public officeholder, including all people appointed to work in non-departmental public bodies, such as NH¹⁰. Five of the seven principles are key to our assessment. These are:
- Objectivity - Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
 - Accountability - Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
 - Openness - Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
 - Honesty - Holders of public office should be truthful.
 - Leadership - Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.
- 13 It is within this context that we have assessed NH's performance, under the headings (B) Behaviour Unacceptable in a Public Body, (C) Failure to Comply with Statutory Directions in the Licence, and (D) Failure to Have Due Regard to Guidance in the Licence.

¹⁰ <https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-of-public-life--2>

(B) BEHAVIOUR UNACCEPTABLE IN A PUBLIC BODY

- 14 We start with the licence condition that applies to NH's interface with the public. Although para 5.19 is not a statutory direction, it should be a golden thread through all NH's interactions with organisations and the public, and we quote it below for reference.

Licence Para 5.19 In complying with 5.17 and 5.18, the Licence holder should co-operate with other persons or organisations in a way which is demonstrably:

- (a) Open and transparent – involving relevant stakeholders, ensuring that essential information is available to affected and interested parties, and that the processes for engagement and communication are clear;**
- (b) Positive and responsive – seek to build trusting and effective working relationships with key partners and stakeholders, engaging with due efficiency and economy and in a timely manner;**
- (c) Collaborative – working with others to align national and local plans and investments, balance national and local needs and support better end-to-end journeys for road users.**

- 15 We show below, through (1) the statutory consultations; (2) the Transport Assessment Report; (3) NH's response to CPRE's requests; and (4) the EiP, how NH omitted critical evidence that was crucial to understanding the scheme's impacts, presented biased evidence, misrepresented evidence, refused to share information, was reluctant to give straight answers to questions and failed to follow best practice.

(1) The statutory consultations

- 16 Through both statutory consultations NH withheld and refused to share essential information. There was insufficient information to allow the public to make an informed assessment of the impacts of the scheme. Some of the statements were misleading and bordered on the dishonest. NH steered the consultations away from over-arching fundamental questions, such as the need for the scheme and possible alternatives, towards detailed matters of design.

2018 statutory consultation

- 17 No transport assessment or traffic modelling results and little information as to the impacts of the scheme on the environment or the community¹¹ were made available during this first statutory consultation. As a result High Peak Borough Council,

¹¹ We brought this to the attention of the Planning Inspectorate and relevant local authorities by letter dated 11th March 2018.

Derbyshire County Council and the Peak District National Park Authority all submitted holding objections.

- 18 In view of these omissions, we asked Highways England if it would make traffic data available for the next consultation. It promised to do so¹² but the promise was never honoured.

2020 statutory consultation

- 19 The second 2020 statutory consultation was held during a complete lockdown for the Covid pandemic. NH claimed to have mitigated the effect of the restrictions but comparison of the 2018 and 2020 consultations revealed the only ‘mitigation’ was the addition of 3 non-interactive webinars. These provided wholly inadequate replacements for face-to-face events. In addition, people were expected to view hard copies of the documents in three cramped local post offices (as local authority offices were closed) or to view the documents on line.
- 20 A DCO applicant has a duty to consult the community in accordance with the Statement of Community Consultation (SoCC)¹³. The SoCC stated *‘we’re publishing ... consultation material to assist well-informed responses to the consultation... The report will provide information about the potential environmental effects of the scheme.’* The consultation material comprised a colour brochure delivered to the majority of households in the area, a non-technical summary and three volumes of the Preliminary Environment Information Report (PEIR). The SoCC-promised delivery of a 37-page document of FAQ to the majority of households in the area did not occur. Air pollution, noise and carbon emissions were the only impacts assessed and then only partially. The omissions and misrepresentations from the consultation were extensive and are detailed in Appendix A. They included no transport assessment, traffic data or traffic modelling; no mention of the adverse impacts on Glossopdale, on the Peak District National or on the Green Belt; a misleading impression that road safety would improve; and a brochure which focused to the exclusion of all else on the immediate benefits to residents of Mottram and on Woolley Lane – a sales pitch for the scheme, not an honest presentation of its effects.
- 21 Just as with the preceding statutory consultation in 2018, in the 2020 statutory consultation neither the public nor the statutory consultees had the information available to them to make informed responses. Once again Derbyshire County Council,

¹² Email to CPRE PDSY 23rd March 2020 *‘Thank you for your email dated 19 February 2020 regarding the article about the Trans Pennine Upgrade in the Manchester Evening News.... I can confirm that we will honour our promise to present the plans and results of the air quality, noise and traffic figures to the public at engagement events scheduled for later this year, prior to a DCO application’.* Ryan Rawson, Regional Investment Programme (RIP) North Assistant Project Manager

¹³ Planning Act 2008 s 47

High Peak Borough Council and the Peak District National Park Authority all submitted holding objections based on lack of information in the PEIR and the absence of any traffic modelling or transport assessment.

- 22 The degree to which the impacts of the scheme were withheld from the public through the consultation only became apparent through the scrutiny allowed by the EiP. These impacts included (i) increased traffic impacts and congestion causing rat running on residential streets (counter-productive to the adoption of active travel measures), poorer urban environment and increased risk of road crashes, all within Glossopdale; (ii) increased risk of road crashes on both the SRN and the local road network, particularly the A57 Snake Pass; (iii) severe adverse impacts on the Green Belt; (iv) increased traffic on cross-National Park roads. None of these are mentioned in any of the consultation documents. The brochure delivered to everyone's home concealed information that would have a huge impact on people's well-being. The statements on road safety in the FAQ were in total contradiction to the results presented with the DCO application and bordered on the dishonest. The concealment alone is sufficient to make the consultation on the scheme invalid, and to call into question the validity of the claimed support for the scheme, not to mention NH's integrity.
- 23 The statutory consultations are the only means available to the public to gain an informed impression of the scheme and its impacts. PINS regards them as the best time to influence a project whatever one's opinion¹⁴. The next step, the DCO application, is daunting, technical, requires huge amounts of time to read thousands of pages of evidence, and total commitment to keep up with weekly deadlines, answering questions from the Examining Authority (ExA), rebutting evidence and scanning revised versions of NH's original documents. It therefore excludes the majority of the public who do not have the resources or perseverance to engage.
- 24 NH is required to produce a Consultation Report to show how it met its legal duties with respect to consultation and took account of the comments made. The Consultation Report is therefore an important document. Best practice¹⁵ advice is for those making a DCO application to make it available before the application is submitted to PINS. NH refused to do this when we asked¹⁶ and only submitted it with the DCO application. It therefore failed to follow best practice. Seeing the comments made and NH's response to them would have helped the public prepare for the DCO process.

¹⁴ <https://infrastructure.planninginspectorate.gov.uk/application-process/the-process/>

¹⁵ Planning Act 2008: Guidance on the Preapplication Planning Process, 2015, para 81
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418009/150326_Pre-Application_Guidance.pdf

¹⁶ Email from CPRE to NH 17 May 2021 asking if the consultation report will be available before the DCO application is made, as good practice advises. Email from NH to CPRE 25 May 2022 advising that full consultation report will be published when DCO application is submitted

- 25 Once the DCO application is submitted, all the local authorities are invited to submit adequacy of consultation reports to PINS. Although all responded that NH had held the consultation according to the SoCC, Derbyshire County and High Peak Borough Councils (AoC-003) and the Peak District National Park Authority (AoC-004) drew attention to multiple flaws in the consultation; and reported that insufficient information was published with the consultation to enable them and the local community to determine the likely impacts of the scheme. The Councils also reported that they had *'received multiple letters from residents which raised similar concerns'*.
- 26 In summary, both consultations were a travesty of what a consultation should be. Under its licence NH is bound to follow the Cabinet Office guidance on consultation. The current version of this, issued in 2018, encourages those preparing consultations to *'give enough information to ensure that those consulted understand the issues and can give informed responses'*. The Gunning Principles for consultation¹⁷ require *'There is sufficient information to give 'intelligent consideration' - The information contained in a consultation document should not be as inaccurate or incomplete as to mislead potential consultees in their responses.'* The Aarhus Convention guarantees the right of access to environmental information held by or for public authorities, subject to limited conditions.
- 27 We have shown above that the consultation did not follow best practice according to any of these principles or guidance. It was not conducted in an open and transparent way. The limited amount of information available was so selective it was biased to the point of being dishonest, and would likely be prejudicial to a party affected by the decision. No-one could have made an intelligent consideration of, or submitted an informed response about, the scheme's impacts.
- 28 It appears contrary to good practice to have received holding objections from the statutory consultees in response to the 2018 consultation, and not addressed those concerns before holding another statutory consultation. An effective approach would have been to address all the statutory consultees' concerns and to then seek public views before proceeding to a DCO application. Development of a NSIP should be front loaded with a WebTAG compliant transport appraisal and full environmental impact assessment available for public scrutiny before the formal DCO process is entered. This was not done.

¹⁷ <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>
Supreme Court in *R (Moseley) v Haringey London Borough Council* [2014] 1 WLR 3947

(2) Transport Assessment Report (APP-059)

- 29 The failure to supply full information about the transport impacts, the traffic modelling and traffic data continued into the DCO application. A full WebTAG compliant appraisal, essential to understanding the impacts of the scheme, was not presented as part of the DCO application, as required by National Policy Statement National Networks 2014 (NPSNN) 5.207. The Transport Assessment Report (TAR) accompanying the DCO application did not allow full comprehension of the traffic effects of the scheme or provide sufficient evidence to test the impacts of the scheme against legal, policy and guidance requirements.
- 30 The withdrawn but de facto guidance states that *'a TA is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme and to improve accessibility and safety for all modes of travel¹⁸'*. Current Government Guidance¹⁹ for planning states *'Transport Assessments are thorough assessments of the transport implications of development'*, and *'care should be taken to establish the full range of studies that will be required of development at the earliest opportunity as it is unlikely that a Transport Assessment or Statement in itself could fulfil the specific role required of a transport element of an Environmental Impact Assessment where this is required'* as in this scheme (our emphasis).
- 31 Despite all this guidance NH reduced the main purpose of the TAR as *'to summarise the development of the Scheme in a single, stand-alone report for general consumption.²⁰'* The omissions and flaws detailed in Appendix B show how far the TAR fell short of presenting a report for general consumption, never mind a 'thorough', 'comprehensive and systematic' assessment of the transport implications of the scheme. No details were given of the traffic modelling and the results showed numerous inconsistencies, still unexplained at the end of the EiP. In three and a half pages it named the modelling software and used three figures to show the modelled area and local zone disaggregation. There was no local model validation report, no forecasting report, no options report, no strategic case report, no economic case report, no appraisal summary. The impact of increased traffic within Glossopdale was barely addressed - the increased risk of road crashes on residential roads, severance of pedestrians, the impact of HGVs, longer travel times were not mentioned or addressed. Journey time savings were limited to parts of journeys, not actual journeys the travelling public would make. There was no assessment of the impact on buses.

¹⁸ Guidance on Transport Assessment, DfT & DCLG, 2007, para 1.2

¹⁹ <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>

²⁰ TAR 1.6.3

- 32 We challenged NH on the quality of the TAR when the DCO documents were submitted but did not receive a reply until well into the EiP. It was defensive and dismissive²¹: *'It is not normal practice to submit all the detailed information relating to the traffic and economic analysis and modelling of a scheme due to the complexity and sheer volume of the data that underpins it, which cannot generally be understood and interpreted by interested parties, unless they are specialists in the fields of traffic modelling and economic analysis²².'*
- 33 Notwithstanding that NH knew there would be, and was, at least one transport professional (MTRU) engaged in the EiP, this was obstructive and counter to understanding the scheme's impacts. Others also challenged the quality of the TAR to which NH responded²³: *'The Transport Assessment Report (TAR) (APP-185) was prepared in accordance with industry standard best practice which is based on previous Department of Transport (DfT) guidance on the preparation of transport assessment that was withdrawn several years ago and not subsequently replaced by alternative guidance. Therefore, currently there is no guidance regarding the preparation of transport assessments for transport schemes'*. Due to the poor assessment we and other IPs appealed to the ExA [REP10-017] that NH should produce a Web-TAG compliant transport appraisal that addressed our concerns. The ExA did not respond to our request. NH did respond [AS-011] as a late submission to the penultimate deadline, reasserting arguments previously made.
- 34 In summary, the TAR contained highly selective information designed to promote the scheme and conceal the serious adverse impacts it would impose. NH failed to meet the minimum standard set by Government for TARs as a 'comprehensive and systematic' assessment of the transport implications of development, let alone go the extra mile required by its licence. NH has no excuse for producing such a poor assessment.
- 35 The lack of transparency regarding the information and data about the traffic modelling is most serious. It limits the public's involvement in the EIA process, which is important, not just to ensure compliance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regs'), which seek to ensure a process by which the public is given an opportunity to express their opinion on environmental matters, but also with the Aarhus Convention in respect of public participation. The public can only participate and give a reasonable opinion on environmental matters if sufficient background data on projected environmental effects is provided. It also undermines the process through which the SoS will seek to ensure that he is satisfied that the material

²¹ REP7-025, 9.69.5

²² REP5-021 page 13

²³ REP7-026, 9.70.33

provided by NH is sufficient for him to reach a reasoned conclusion on the significant effects of the proposed development on the environment.

(3) NH response to CPRE PDSY's requests for information

36 On our behalf Keith Buchan of MTRU began asking for background data on the transport appraisal and traffic modelling in March 2021 in order to inform the development of our alternative proposal and to understand scheme effects. His requests received no response. NH claimed not to have received the emails, although MTRU had never experienced such difficulties with NH before. Although we were told that the failure to receive MTRU emails was being investigated, a year later we have not received any details and on occasion NH did receive emails directly from MTRU. From May 2021 CPRE forwarded all emails from MTRU to NH. We have dealt with our experience during the pre-EiP period, through four key documents supplied to us and during the EiP.

i. Pre-examination

37 Listed below are our repeated requests by email for information relating to the full transport appraisal²⁴, only one of which was successful (in bold).

- 8th June 2021 we resubmitted our list of requested documents²⁵, all of which would have been available had a full WebTAG compliant appraisal been undertaken.
- 22nd Jul 2021 we asked if the sifting of options exercise²⁶ had been repeated since the 2015 Transpennine Routes Feasibility Study and for a response to 8th June email.
- **24th Aug 2021 NH confirmed 'that we have not repeated the Early Appraisal Sifting Tool (EAST) since finalising the options in 2015'.**
- 30th July having read the DCO documents we submitted questions and request for information (summarised in footnote below to show they were straightforward²⁷).

²⁴ REP12-034 which is a compilation of the emails between us and NH.

²⁵ Local Model Validation Report; TUBA outputs for vehicle kilometres and carbon (if not in above); Options Report; Strategic Case; Economic Case; Forecasting report, including use of DfT scenario approach; Assessment Summary Table.

²⁶ A57 Link Roads 6.3 Environmental Statement (ES) Chapters 1-4 Introductory Chapters Planning Inspectorate scheme reference: TR010034 Application document reference: TR010034/APP/6.3 para 3.3 Page 97 of 134

²⁷ Local model and forecasting report or data missing, other than the Transport Assessment (TA) and Appendix 2.1; WebTAG compliant appraisal not submitted but implied in TA, please submit it. Flow diagram in the TA and Appendix 2 are not clear as to their exact position on the roads to which they refer. Is there a labelling issue with Market Street in Hollingworth? Questions:

- 1 What models were used in addition to SATURN for the junctions?
- 2 What are the costs for signalling Junction 4 and what were the traffic impacts of doing this without the full scheme?
- 3 Which DIADEM elements were switched on and off?
- 4 How was walking and cycling included?
- 5 How was public transport included?
- 6 What are the forecasts or assumptions for the local modelled area for:
Public transport (today – 2025 – 2040)

- 6th August NH indicated it was dealing with our 30th July request under the terms of the Environmental Information Regulations 2004 with a due date for issuing a response of 20th August.
- 24th August NH, responding to our email 6th Aug, referred us to the transport modelling and forecasting reports submitted with the DCO. As we have shown above in para 32 there were no transport modelling and forecasting reports submitted with the DCO.
- 2nd Sept we repeated our request for information.
- 15th September 2021, MTRU made a formal complaint *'about the failure to supply basic information on a major scheme DCO: the A57 Link Roads. This has two aspects: the failure to supply the information and the way in which specific requests have not been answered or answered in an unsatisfactory manner. This has severely restricted the ability to scrutinise the justification for the scheme... Please engage with me so that my information requests can be met and my requests for clarification answered.'* To date, MTRU's formal complaint has still not been addressed.

38 NH's target to respond to emails is within a maximum of 10 working days. The only email which received a response within 10 working days was the email in which NH invoked the Environmental Information Regulations 2004 – NH failed to meet this deadline too. The blatant delay in responding was uncooperative and negative. Directing us to where information could be found, knowing full well that it was absent, breaks multiple Nolan principles. NH's approach to dealing with our requests for the full transport appraisal was in contrast to general enquiries which were dealt with in a timely fashion, including those relating to the scheme's environmental statement and road collisions which were addressed under Freedom of Information. This gave us the impression that NH had something to hide from scrutiny in the background transport work to the scheme.

39 For eight months NH were uncooperative, unhelpful and withheld information about the full transport appraisal that should have been supplied with the DCO application. Finally in the evening of Friday 12th November - one working day before formal proceedings for the EiP commenced on Tuesday 16th November - four background documents were sent to us; the Combined Modelling and Transport Appraisal Report, the Economic Appraisal Package, the Transport Forecasting Package and the Transport Modelling Package for the A57 Link Roads.

Cycling (today – 2025 – 2040)

Walking (today – 2025 – 2040)

7 Are the time savings in Figure 7.7 to the junctions at each end but not through it? Are there more details of real origin and destination pairs and zone to zone timings?

8 Do you have queue length data for key junctions?

ii) The four background documents – REP2-090

- 40 When NH shared the four technical documents they told us they would not be submitting them to the EiP *‘due to the technical depth of these documents. The Transport Assessment produces the data in layman’s terms and should be used instead²⁸’*. In the interests of openness and transparency we submitted them to the EiP at with our written representation on January 14th 2022, Deadline 2. They were accepted by the ExA and published by PINS as one combined document - REP2-090 (in which two of the documents are repeated). A number of IPs, including CPRE, referred to REP2-090 in their submissions. At first NH ignored references made to it. However, on 23rd February 2022 in response to IP submission REP3-032 drawing attention to REP2-090, NH stated²⁹:
- 41 *‘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’*.
- 42 This statement was not only misleading, it was also incorrect [REP6-032]. The full package of information accompanying the DCO application was accepted by the Planning Inspectorate on 26 July 2021. The four documents were released by NH to CPRE on 12th November 2021, nearly 4 months after the DCO application was accepted, not in advance of its submission.
- 43 Furthermore these documents are 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. The fact that the four documents were accepted by the ExA indicates they must have been considered of use to the EiP; the ExA and IPs were able to read them in the context of all the supporting information for the scheme. We found them crucial for scrutinising evidence. They emphasised the poverty of information in the TAR and how much essential evidence NH had withheld. For example:
- 44 The Transport Forecasting Package revealed that refinements were made to the model during development of the scheme in order to reduce air pollution in Tintwistle and Dinting Vale Air Quality Management Areas (AQMAs), and along Glossop High Street West³⁰. The pollution arising from the scheme would otherwise have been of such

²⁸ Draft Note of meeting between NH and CPRE, para 6, 15 December 2021

²⁹ REP5-021 page 13

³⁰ REP2-090 7.3.1 pdf page 519/790

severity that it was considered that it would jeopardise the application for development consent. These model refinement steps could have led to the anomalies in the traffic outputs described above. They could also have led to differences between 2025 'do minimum' and 'do something' modelled traffic flows through both AQMAs and along the A57 not meeting the criteria for, and therefore being excluded from, assessment of air quality³¹. They could also have led to changes in traffic flows on the A628T with the scheme not meeting the criteria for assessment under the Habitats Regulations Assessment.

- 45 The Transport Forecasting Package also revealed that the traffic model had been applied to reduce traffic flows on the A57 through Glossop and divert them onto residential roads, leading to all the consequences described in para 32 above. It revealed a diversionary route labelled 'Hadfield Alternative'. This information was not available in any of the DCO documents and was a key point of concern to IPs³².

iii) During the EiP

- 46 Once the EiP started and the ExA was taking note of proceedings NH became more responsive. We had two technical meetings with NH during the EiP on 15th December 2021 and 19th January 2022 in order to allow MTRU to ask questions, request information and increase our understanding of the transport assessment. The meetings were led by NH; direct technical dialogue with those undertaking the assessment of the scheme was not allowed. This fundamentally limited our understanding. The bulk of the requested information was supplied by 7th March [REP7-025, 9.69.61]. However the data requested on public transport was never satisfactorily resolved (see Appendix C a. below).
- 47 We initially agreed to aid the EiP and the ExA as to where we did and did not agree with NH through a Statement of Common Ground (SoCG). Due to NH's obfuscation and ignoring our requests for clarification we were unable to complete this.
- 48 In summary, NH was completely resistant to engaging with us and providing information before the EiP started. There was no good reason for withholding any of it, and it could all have been shared at the latest with the DCO application. Once the EiP started, the formal process required at least a show of cooperation but even that was hampered by NH's restrictive management of the dialogue.

³¹ Through the Tintwistle AQMA the predicted vehicle flows were 40 vehicles per day short of the threshold (an increase of 1,000 AADT) required by the guidelines. The shortfall to meet the criteria for the Habitats Regulation Assessment was 150 vehicles per day. The PDNPA in its Local Impact Report REP2-048, 8.3.12 through to its deadline 9 response REP9-035 pp 3-4 submitted a sustained judgement that the European sites adjacent to the A628T must be assessed but was ignored.

³² REP2-089; REP4-027 pp4-5; REP9-051 pp1-3; REP9-049

(4) Examination of the DCO application

49 The topics through which NH tried to conceal crucial evidence are detailed in Appendix C. They ranged from assessment of public transport; assessment and review of appraisal options; explanations of the spurious traffic data, the uncertainty log and associated development; increase in vehicle kms; a sensitivity test for carbon emissions; visibility of the scheme to the public; major nearby development Godley Green Garden Village; and the impacts of national and regional policy on public transport walking and cycling policy on the scheme. The tactics demonstrate a spectrum of behaviour from delay in producing information to the extent it was too late for the EiP to consider, trying to show due process had been followed when it had not, avoidance of answering questions and drip feeding small amounts of information, playing circular games, offering diametrically opposing answers to the same repeated question, and poor understanding of its own evidence. All this wasted EiP time and opportunities for proper scrutiny, gave rise to a lack of confidence in the work undertaken by NH and its contractors, and challenged the integrity of the environmental, social and economic assessment of the impacts of the scheme.

Summary of non-compliance with Licence para 5.19

50 Both statutory consultations misled the public as they were prejudicially biased, withheld information critical to understanding the impacts of the scheme and failed to meet basic standards of consultation. NH, when dealing with our requests for information, failed to engage in an open, transparent, responsive and collaborative way. Instead it was obstructive, only improving its behaviour once under observation from the ExA. The TAR presented with the DCO application was an exceedingly superficial assessment of the scheme from which crucial evidence was withheld. NH's approach throughout the EiP was to reduce adverse impacts to insignificance and to dismiss challenges, rather than engage in constructive dialogue. It was evasive, obstructive and defensive, and frustrated the many attempts to get substantive answers that would aid understanding of the scheme's impacts.

(C) FAILURE TO COMPLY WITH STATUTORY DIRECTIONS IN THE LICENCE

Licence Para 4.1 It must operate and manage the SRN in the public interest in respect of both current activities and needs and in providing effective stewardship of its long-term operation and integrity.

51 The process of addressing the problems along the A57/A628/A616T corridor was deeply flawed. The A57T is but one section of the strategic South Pennines Corridor between the Port of Liverpool and the Humber Ports³³. Instead of addressing the whole route the 2015 Trans-Pennine Routes Feasibility Study focused on the traffic 'hot spot' at Mottram. It excluded another strategic corridor, the M62, the traffic on which interacts

³³ South Pennines Route Strategy 2017 Highways England

with the A628T corridor. The study focused on highway matters, avoided a multimodal approach, and failed to adopt a full corridor approach. It did not therefore follow the WebTAG requirements to start with a blank sheet, consider transport problems in the round and consider all solutions including non-transport ones³⁴. This narrow approach is reflected in the South Pennines Route Strategy in which all the issues on the SRN are solved with highway interventions without due regard to modal shift to rail. The Mayor of Liverpool has expressed his dissatisfaction with this approach in his recent rejection of the A5036 Port of Liverpool dualling at the west end of the corridor³⁵.

- 52 The scheme under examination is what remains of previous, larger scale proposals (the 2007 Mottram-Hollingworth-Tintwistle bypass). The issue of piecemeal implementation disguising real strategic impacts was dealt with as far back as the 1980s and by SACTRA. Yet even now this piecemeal approach continues to east and west of the scheme within this corridor. To the east NH is exploring the feasibility of the Hollingworth-Tintwistle bypass³⁶. It is likely that the current scheme will increase traffic along the A628T through Hollingworth and Tintwistle, fuelling irresistible demands for road building to relieve the villages. The next step would then be the proposed dualling of the corridor to the M1³⁷. Any extension to the east would impact directly on the Peak District National Park and bring the test of major development in a National Park into play. By developing a small length of the corridor the big strategic impacts are avoided and resistance is reduced as each piece passes through its formal process as a standalone scheme.
- 53 In the other direction, five miles to the west along the M67, the M67/M60 J24 Denton Island interchange was excluded from the scheme's assessment. Yet the interchange has long been recognised as a pinch point for congestion³⁸ in need of improvement, and the proposed interventions are part of the Trans-Pennine Upgrade of which this scheme is a part. *'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... It is included in*

³⁴ Transport Analysis Guidance The Transport Appraisal Process, DfT, 2014
<https://webarchive.nationalarchives.gov.uk/ukgwa/20181209040649/https://www.gov.uk/government/publications/webtag-transport-appraisal-process> The more recent version published in May 2018 carries the same information
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938766/tag-transport-appraisal-process.pdf

³⁵ Liverpool City Region Mayor, letter to SoSfT re A5036

³⁶ 2020 statutory consultation FAQ; RIS2 2020-2025

³⁷ Trans-Pennine tunnel study

³⁸ South Pennines Route Strategy 2017 Highways England; South Pennines Route-Based Evidence Strategy Report, Highways England, 2014, Figure 3; South Pennines Route Strategy, Highways England, 2017 p.29

the Highways England Risk Register for the project³⁹. The A57 Link Roads would add, according to NH modelling, an extra 8,000 vehicles every weekday to the M67 in 2025 the opening year⁴⁰. Adding in traffic from the proposed nearby major development Godley Green Garden Village (see Appendix C ix) would lead to the interchange operating at above or approaching capacity⁴¹. National Highways' plans for mitigation measures at the M60 J24 interchange were not mentioned in the DCO application.

- 54 All these failings stem from a failure of those undertaking an appraisal to understand and/or have due regard for the strategic context within which a proposal sits, as identified by the Treasury's Green Book 2020 (see para 92 below). Effective stewardship of the SRN's long term operation and integrity also requires a strategic multimodal approach, which NH has failed to take.
- 55 Increasing carbon emissions in a climate crisis is not effective stewardship in the public interest. In June 2021 the Climate Change Committee stated: *'Decisions on investment in roads should be contingent on analysis justifying how they contribute to the UK's pathway to Net Zero. This analysis should demonstrate that the proposals would not lead to increases in overall emissions⁴².'* In June 2022 it identified that *'Substantial investment in roadbuilding should only proceed if it can be justified how it fits within a broader suite of policies that are compatible with the UK's Net Zero trajectory⁴³.'* The case for the A57 Link Roads was developed many years in advance of DfT's Decarbonising Transport (2021) and the UK's Net Zero Strategy (2021), and did not foresee these key policy documents of the current legal framework, let alone attempt to align with them. The traffic modelling failed to express either document's policy objectives or targets as core assumptions - the current traffic models are based on assumptions which reflect very different scheme specific objectives that date from many years ago.

Licence Para 4.2 Without prejudice to the general duties on the Licence holder under section 5 of the Infrastructure Act 2015, the Licence holder must, in exercising its functions and complying with its legal duties and other obligations, act in a manner which it considers best calculated to:

Para 4.2d. It must ensure efficiency and value for money.

- 56 NH prematurely rejected alternatives (our package of lorry control system and sustainable travel measures; and the proposed Mottram Gyrotory Flow) that both

³⁹ REP12.028 Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 page B34 para 15.3.8; pdf page 110/170 - submitted by CPRE

⁴⁰ A57 Link Roads, ES, Appendix 2.1 Traffic Data, AAWT Opening Year 2025

⁴¹ Transport Locality Assessments - Introductory Note and Assessments - Tameside Allocations GMSF Nov 2020 page B32 Table 9 pdf 108/170

⁴² Table A6 pdf page 20/32 Joint Recommendations Report to Parliament, Climate Change Committee June 2021

⁴³ Page 139, Progress Report to Parliament, Climate Change Committee, June 2022

scored as well or better than the scheme in the 2015 Trans-Pennine Routes Feasibility Study.

- 57 Our package was rejected as difficult to deliver – updated technology has simplified lorry control systems based on weight restrictions. The MGF, as proposed by an IP Mr Bagshaw, was initially described⁴⁴ as the ‘*best performing individual option against the sifting criteria and for meeting the objectives for the Scheme*’ and as deliverable and feasible. Then, curiously, at this point in the assessment of options⁴⁵ it was decided to assess the MGF not as a standalone scheme, nor in conjunction with other sustainable measures, but in conjunction with a package of measures which included first and foremost a link road between the A57 (T) and the A57 in Glossop.
- 58 As NH failed to review the options during development of the outline business case for the scheme, the scheme is not proven to provide the most efficient and best value for money. The Economic Case for the scheme has not been made.
- 59 Compounding this error is the failure to include public transport, walking and cycling in the traffic modelling, which led to a BCR that does not reflect the current policy framework. The Government plans to cut urban traffic by increasing walking and cycling to 50% of all trips by 2030. Greater Manchester plans for no net increase in motor vehicle traffic and to reduce car’s share of trips to no more than 50%, with the remaining 50% made by public transport, walking and cycling by 2040. Had the traffic modelling reflected these policy measures it would have shown a reduction in traffic forecasts for the scheme, and therefore a reduction in the value of journey time savings and the value for money. The failure to include public transport walking and cycling is part of NH’s failure to engage with the strategic context of the proposal (see para 92).

Licence Para 4.2e. It must protect and improve the safety of the network.

- 60 The SRN and local road network would become more dangerous for drivers, not safer, with the scheme. The risk of road crashes would increase across the modelled network by 0.3%, the brunt of which would occur on the A628T and the A57 Snake Pass (county A road across the National Park). Despite the increased risk being a direct result of the scheme NH dismissed it as insignificant and offered no mitigation.
- 61 The increased crashes on the A628T would appear despite, and would negate the effect of, the A628T Safety and Technology improvements, previously part of the scheme but progressed separately as not requiring development consent. The improvements focus

⁴⁴ REP2-005 revised ES Ch 1-4 Introductory Chapters, page 100 Table 3.3 (23 Options assessed at the initial sift)

⁴⁵ Trans-Pennine Routes Feasibility Study, 2015, Appendix 2, the Stage 2 Report of this same study [Annexes – Annex 1], para 5.9

on crash hotspots and the provision of electronic signs⁴⁶ and were included within the baseline 'do minimum' scenario⁴⁷ for the scheme. The increased risk of crashes on the trunk route is due to traffic diverting off the safer motorway network and onto the A628T⁴⁸. In addition, *'the severity of the accidents which are predicted to occur on the new link road may increase due to the increased speed'* (TAR 7.2.12). NH's acceptance of increased crashes on the SRN does not meet the statement in Road Investment Strategy (RIS) 2020-2025: *'enhanced safety remains Highways England's first imperative and informs everything it does from design principles, road standards, operational procedures and investment decisions. We will strengthen this ambition through our investment plan, performance specification and targeted safety improvements through the small schemes fund'*.

- 62 The A57 Snake Pass *'is forecast to experience a modelled predicted increase of more than 160 accidents over the 60-year appraisal period⁴⁹'* with the scheme. NH took the attitude that *'safety features in areas outside the Scheme are not within the Applicant's remit⁵⁰'*. The route is already considered a high risk rural road. To mitigate the scheme's impacts Derbyshire County Council proposed the use of average speed cameras. However, such measures would cause harm to the National Park's statutory purposes and were challenged by the National Park Authority⁵¹. In the face of these difficulties NH proposed to 'update' the model with respect to the incidence of crashes on the Snake Pass at the detailed design stage when there would be no accountability through the EiP. *'It is possible that the appraisal overestimates the forecast increase in accidents on this section of road...'* *'...scheme modelling will be updated as the detailed design evolves⁵²'*. The start of the Snake Pass is 3.2miles east of the scheme. The detailed design of the scheme is not going to alter the incidence of crashes on the Snake Pass unless it includes a massive traffic restraint measure akin to the Mottram crossroads and/or average speed cameras along the Pass. This 'updating' appears most unusual as the modelling of accidents on the Snake was set up to ensure the most accurate relationship between accidents and flow [REP2-090, 4.7.32-4.7.33]. It appeared to us as subterfuge – an attempt to 'magic away' adverse impacts of the scheme and avoid mitigation which could prove difficult and costly to implement.

⁴⁶ The Case for the Scheme 2.1.9

⁴⁷ ES Ch1-4 Introduction 2.4.6-2.4.9; 3.4.5

⁴⁸ APP-185, 7.2.13

⁴⁹ Transport Appraisal 7.2.11-7.2.13

⁵⁰ Consultation Report Appendix Y page 167

⁵¹ REP12-014 SoCG between PDNPA and NH, 2.3.6

⁵² REP9-020 SoCG between Derbyshire County Council and NH, 9.5

Licence Para 4.2f. It must cooperate with other persons or organisations for the purposes of coordinating day-to-day operations and long-term planning;

- 63 This duty stems from section 5(1) of the Infrastructure Act 2015, to cooperate with other persons or organisations in order to:
- (a) Facilitate the movement of traffic and manage its impacts;
 - (b) Take account of local needs, priorities and plans in planning for the operation, maintenance and long-term development of the network (including in the preparation of route strategies);
 - (c) Provide reasonable support to local authorities in their planning and the management of their own networks.
- 64 We have not been privy to any of the meetings between the statutory stakeholders and NH. What follows has been collected from written statements made before and during the EiP. On the evidence before us NH has failed to meet this duty and licence condition.
- 65 As noted in para 22 above two local authorities and the Peak District National Park Authority put in holding objections on the basis of inadequate information. The latter changed this to an outright objection. This reflected not only the adverse impacts on the National Park, but also the lack of information available in the DCO documents.
- 66 HPBC requested an extension to the 2020 statutory consultation area so that all wards within Glossopdale would receive a coloured brochure about the scheme. This was denied.
- 67 NH refused to meet High Peak Borough Council's request to assess air quality through two AQMAs. It remains an area 'not agreed' through the SoCG⁵³ (see para 45 above).
- 68 NH dismissed the need for mitigation measures requested by High Peak Borough and Derbyshire County Councils for traffic impacts and increased risk of road crashes. NH considered all these impacts to be insignificant and not requiring mitigation. Towards the end of the EiP NH agreed to work on some measures, outside the DCO process, thus avoiding public scrutiny.
- 69 It refused to meet the Peak District National Park Authority's request to assess the impacts of the scheme on the European Natura 2000 sites adjacent to the trunk route⁵⁴, on the Tintwistle AQMA and on the Tintwistle Conservation Area.

⁵³ REP12-008 & REP12-025 SoCG between High Peak Borough Council appears in library twice, documents are the same, paras 9.5, 9.18 & 9.20; REP2-046, 19.1 HPBC Local Impact Report; REP9-033

⁵⁴ REP12-014, 2.1.1.2, 2.3.1

70 Although NH's safety responsibilities are limited to the SRN, it is expected to cooperate with government agencies, the devolved administrations, local government, enforcement authorities, a host of other public and private bodies, and road users to improve road safety⁵⁵. Every Local Highway Authority with responsibility for the roads that would see increased crashes with the scheme in place unanimously seek reduction of road crashes and casualties, all of which NH has ignored both in future day-to-day operations and long term planning:

- DCC LTP 3 2011-2026;
- South Yorkshire Mayoral Combined Authority⁵⁶, which aims to improve safety on the network for all users. *'Safety for all road users must remain of paramount importance'*;
- South Yorkshire Local Transport Plan aims to maximise safety⁵⁷;
- Sheffield City Council Transport Strategy (2018)⁵⁸;
- Kirklees MBC 2025 Transport Vision⁵⁹;
- GMCA's *'ambition'* is *'To reduce deaths on our roads as close as possible to zero (by 2040)⁶⁰'*.

71 In the final version of the SoCG between Transport for Greater Manchester (TfGM) and NH, TfGM requested that NH provide a response to how the scheme would contribute to the Government's Transport Decarbonisation Plan and to Greater Manchester's local carbon targets and budgets⁶¹. *'The Climate Emergency declarations that are guiding local policy and therefore 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'*. NH refused this request despite the requirements of NPSNN para 4.4 and the EIA Regulations. However, it *'prepared a table to split the predicted GHG emissions for Greater Manchester and ... has issued this to TfGM.'*

⁵⁵ DfT's The Road Safety Statement 2019 A Lifetime of Road Safety

⁵⁶ Roads Implementation Plan 2020 SY MCA <https://governance.southyorkshire-ca.gov.uk/documents/s3997/Annexes%201%20The%20Roads%20Implementation%20Plan.pdf>

⁵⁷ SY LTP 2011-2026 7.1-7.15

⁵⁸ Transport Strategy 2019-2035 Sheffield CC <https://www.sheffield.gov.uk/home/travel-transport/transport-strategy-plans>

⁵⁹ <https://www.kirklees.gov.uk/beta/planning-policy/pdf/supportingDocuments/transportInfrastructure/2025-Kirklees-Transport-Vision.pdf>

⁶⁰ Transport For Greater Manchester, 2040, revised Jul 2021, <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/supporting-documents/?folder=\09%20Connected%20Places#fList>

⁶¹ REP12-009 TfGM Statement of Common Ground para 10.3, pp 28-29

72 TfGM also asked NH ‘*how the scheme contributes to Greater Manchester’s Right Mix targets and the Greater Manchester’s 2040 policies*’. This is Greater Manchester’s plans for no net increase in motor vehicle traffic and to reduce car’s share of trips to no more than 50%, with the remaining 50% made by public transport, walking and cycling by 2040. NH avoided the request and gave a tangential answer. In fact the traffic modelling in which TfGM had played no part had taken no notice of the Right Mix targets, and hence it could not know what impact the scheme would have. It is still unclear if TfGM understands the impacts of the scheme as it was only engaged in scrutiny of the scheme through the SoCG

73 Despite the scheme creating adverse impacts on the responsibilities of all these authorities, NH refused to take responsibility for addressing them, deeming them insignificant and, if related to traffic impacts, the responsibility of the highway authority.

Para 4.2g. It must minimise the environmental impacts of operating maintaining and improving the network and seek to protect and enhance the quality of the surrounding environment;

74 NH fails to meet this statutory direction as follows.

75 Operational GHG emissions have not been minimised as no traffic restraint measures were applied to the proposal⁶². The scheme would result in 410,000tCO₂ emitted over 60 years.

76 Hollingworth and Tintwistle - NH has failed to minimise the environmental impacts of the SRN as it passes through Hollingworth and Tintwistle. These two villages straddle the A628T, lie immediately east of the scheme and experience traffic congestion with long queues, air pollution from heavy lorries and increased road crashes. Every consultation about the scheme has raised key concerns around these two villages, found the plans did not address their problems⁶³, and showed strong support for measures to relieve traffic through both villages. In the 2018 statutory consultation⁶⁴ Highways England declared it ‘*is unable to resolve*⁶⁵’, that Hollingworth and Tintwistle are not part of the solution. During the 2020 consultation NH refused to engage with questions on Hollingworth and Tintwistle, stating that measures for wider relief are at an early

⁶² NH stated orally that no restraint was applied to the traffic model for the current scheme [EV-25 Issue Specific Hearing 2 Session 2 page 10 3rd line]. However when summarising its position at the Hearing, NH ignored the wider and deeper questions posed by the ExA about restraint of motor vehicles, encouraging active travel, and promoting routes which avoid the National Park. It referred only to restraint applied to HGVs in 2015 Trans-Pennine Routes Feasibility Study when testing options [REP4-008 Item 3d page 15].

⁶³Trans Pennine Upgrade Programme Non statutory Consultation Report Oct 2017 4.10.3

⁶⁴ Trans Pennine Upgrade Report 2018 4.2.1

⁶⁵ Trans Pennine Upgrade Report 2018 4.2.1

concept design stage. Given that traffic along the entire Trans-Pennine route will be affected by the scheme this is a serious oversight. A strategic approach towards long term planning for the whole of the corridor would have avoided this.

77 The surrounding environment that the scheme would harm includes the (a) Peak District National Park, (b) Glossopdale and (c) Greater Manchester.

(a) The first statutory purpose of the National Park is to protect and **enhance** natural beauty wildlife and cultural heritage (our emphasis). The Dark Peak, crossed by both the A628T and the A57 Snake Pass, is famed for its desolate and exposed tracts of moorland that stretch great distances, create a sense of remoteness⁶⁶ and are largely inaccessible to motor traffic. The noise from traffic on all these roads already affects the natural beauty and tranquillity of the Park up to a mile distant on open moorland⁶⁷. The increased traffic generated by the scheme would further harm these nationally important landscapes and impair their tranquillity. NH refused to recognise that the impacts of increased traffic through the Peak District National Park would be significant, as considered by the statutory authority for the National Park, and offered no mitigation. The objection from the PDNPA shows that NH's interpretation of the National Park's statutory purposes and associated policies does not meet the standard required of it by its s.62 duty under the Environment Act 1995.

(b) Within Glossopdale the local environment would be impacted negatively by more congestion, rat running on residential roads, noise, and air pollution. NH dismissed the impacts as insignificant.

(c) The scheme would have a major irreversible negative effect on local landscape and townscape which NH refused to recognise as significant [APP-063, 7.7.8]. The scale and formality of its infrastructure - dual and single carriageways, three concrete underpasses, two bridges, huge new junction, lighting, signage, embankments cuttings and false cuttings, drainage features, fencing, access tracks, new plantings - and its associated traffic would encroach on and fragment open countryside reducing its permeability for wildlife; destroy the individual character of the pastoral landscapes; and harm the setting of the historic village of Mottram and the openness of the Green Belt. The huge new junction where the scheme crosses the A57T is out of scale with the surrounding townscapes. The scheme consumes open land, a finite irreplaceable asset in the UK. It is both natural capital and strategic open space, which supports multiple

⁶⁶ Dark Peak, Landscape Strategy, PDNPA, 2009

⁶⁷ Peak District National Park, State of the Park Report 2000, p 40 - Until recently the National Park was a complete tranquil area apart from Bakewell and Tideswell. By the late 1990s three roads with an excess of 10,000 vehicles per day within the Park, including the A628, reduced the tranquil area by 50%.

ecosystem services critical to urban areas which have higher vulnerability to climate change due to their lack of habitats.

Licence Para 4.2h. It must conform to the principles of sustainable development.

78 The licence spells out sustainable development as *'encouraging economic growth while protecting the environment and improving safety and quality of life for current and future generations.'* All of the above impacts described in paras 51-77 indicate that the scheme fails to conform to the principles of sustainable development.

Licence Para 5.29 It must comply with or have due regard to Government policy.

79 The NPSNN 2014 is the framework for decision making but recognises that relevant national, regional and local policies are in play. In particular a series of provisions of the Planning Act section 104 are incorporated in the NPS, and some of its requirements are specifically stated in terms of other laws and regulations such as the EIA Regs 2017. When dismissing challenges made by us or other parties using other policies, NH quoted NPSNN as the sole framework of relevance to decision-making. The scheme fails to meet a number of NPSNN policies as follows.

80 NPSNN 4.3 requires that for a proposed development the ExA and SoS should take into account its potential benefits, and its potential adverse impacts. The transport assessment and modelling are fundamental to the environmental assessment. With so many omissions and unexplained spurious results within them, it is not credible to even attempt to reach a reasoned conclusion on the significant effects of the proposed development.

81 NPSNN 4.4 requires environmental, safety, social and economic benefits and adverse impacts, to be considered at national, regional and local levels. There was no local or regional assessment of the scheme's carbon emissions despite two sets of available data (BEIS UK carbon emissions national stats and local authority SCATTER budgets from the Tyndall Centre), and a third set of self-scaling data – a local/regional proxy – provided by the study area and traffic model itself (when corrected and fully transparent) [REP9-039]. Local adverse impacts of all kinds – social environmental and economic – were concealed from the public and stakeholders at consultation stage and underplayed during the EiP (see paras 23, 32; Appendix A b-g; Appendix B b-g; Appendix C c, f, i, j).

82 NPSNN 4.6 – projects should usually be supported by a local transport model to provide sufficiently accurate detail of the impacts of a project. The impacts on Glossopdale were withheld from the public as detailed above (see para 23 above) and then from the EiP. When pressure on the issue increased throughout the course of the EiP NH stated that the work had been done, and yet still refused to share their findings with the Examination [REP8-018, Q3.6]. NH's detailed analysis of the traffic on one select link

[REP9-029], Dinting Road, appeared to validate IPs' requests for further analysis of all of Glossopdale but none was forthcoming [REP12-022, 9.87.8].

- 83 NPSNN 4.15-4.17 invokes Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which sets out the information that should be included in the environmental statement. The assessment of GHG emissions does not conform to these requirements [REP8-029, 7.5]. First, it does not provide an accurate quantification of the scheme in isolation; second, it does not provide a proper quantification of the cumulative carbon emissions; therefore, the application is not compliant with the EIA Regulations [REP8-029]. NH's claim that the traffic model is 'inherently cumulative, or is 'compliant with DMRB', does not make the environmental statement compliant with the EIA Regulations on cumulative carbon emissions assessment.
- 84 NPSNN 4.26-4.27 lists the legal and policy requirements for consideration of alternatives, which are not exhaustive. As we have shown above the 2015 options appraisal was flawed and has not been reviewed. Therefore the scheme's status within the RIS, the 2004 Tameside Metropolitan Borough Council Unitary Development Plan 2004 and the Greater Manchester Transport Strategy 2040 is questionable.
- 85 NPSNN 2, 2.24, 3.2 and 4.64-4.66 address road safety. The increased risk of road crashes on the A628T corridor and on local roads means NH has failed to meet the requirements of NPSNN which quotes the Strategic Framework for Road Safety 2011⁶⁸.
- 86 NPSNN 5.11-5.12 Air quality considerations are particularly relevant where schemes are proposed within or adjacent to AQMA or nature conservation sites (including Natura 2000 sites and SSSIs), and where changes are sufficient to bring about the need for a new AQMA or change the size of an existing AQMA; or bring about changes to exceedances of the Limit Values, or where they may have the potential to impact on nature conservation sites. NH adjusted the modelling in a way which removed potential exceedances of limit values for nitrous dioxide within 2 local AQMAs (one on the A57 Dinting Vale through Glossop and one on the A628T through Tintwistle), on A57 High Street West through Glossop and on the Natura 2000 sites adjacent to the A628T. NH refused to assess air quality at any of these locations including the two AQMAs. Hence these NPSNN considerations have been ignored.
- 87 NPSNN 5.150 Great weight should be given to conserving landscape and scenic beauty in nationally designated areas. Despite the scheme causing traffic increases on cross-Park roads, NH refused to recognise this requirement, arguing incorrectly that the policy only applies to development that lies within the National Park.

⁶⁸ <https://www.gov.uk/government/publications/strategic-framework-for-road-safety>

- 88 NPSNN 5.152 requires NH when planning the SRN to avoid National Parks, in this case the Peak District National Park. This it failed to do. The 2015 Trans-Pennine Routes Feasibility Study focused only on the corridor through the National Park. In addition, the scheme would cause traffic to divert off the M62 outside the National Park onto the A628T within the National Park.
- 89 NPSNN 5.202 *Development of national networks can have a variety of impacts on the surrounding transport infrastructure including connecting transport networks... The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development.* NH dismissed the scheme's impacts on the local road network as insignificant and refused to consider mitigation. They also refused to share with the Examination the work they had done which justified their conclusion that the effects were 'insignificant'.
- 90 NPSNN 5.207 requires the WebTAG methodology to be followed. We showed above (paras 30-36 and Appendix B) how the TAR failed to meet the requirements of a WebTAG compliant appraisal.
- 91 Other policies with which NH failed to comply, or to which it failed to have due regard, include:
- (a) The Treasury's *Green Book 2020* identified the common failure of those writing appraisals to engage properly with the strategic context in which their proposal sits. Specifically, business cases frequently do not demonstrate the necessary understanding of:
- the proposal's specific contribution to the delivery of the government's intended strategic goals (such as levelling up or net zero); and
 - the specific social and economic features of different places and how the intervention may affect them;
 - other strategies, programmes or projects with which the intervention may interact, including in a particular geographical area.
- This results in significant flaws in appraisals and business cases. All of the above bulleted shortfalls apply to the A57 Link Roads, were initiated in the 2015 Trans-Pennine Routes Feasibility Study from which the scheme derives⁶⁹, and have led to the noncompliance described in paras 52-60 and 78-91 above, and here in para 92.

⁶⁹ Trans-Pennine Feasibility Study, Highways England & DfT, 2015

<https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports>

- (b) The UK Net Zero Strategy 2021 - NH made no assessment of significance of the scheme's carbon emissions against the annual carbon reduction targets and trajectories for transport in the Net Zero Strategy [REP9-039, 10].
- (c) The Government's Decarbonising Transport, A better greener Britain; Bus Back Better – National Bus Strategy for England; and Gear Change – A bold vision for cycling and walking. By omitting walking, cycling and public transport (except rail users with access to a car) from its transport assessment NH has failed to comply with all of these.
- (d) *National Planning Policy Framework 2021, para 175*. NH refused to recognise that great weight should be applied to protection of the National Park and its setting. The objection from the PDNPA shows that NH's interpretation of the National Park's statutory purposes and associated policies does not meet the standard required of its s.62 duty under the Environment Act 1995.

Summary of noncompliance with statutory directions in Licence

92 Through development of the A57 Link Roads NH is failing to meet the public interest and provide effective stewardship of the long term operation and integrity of the SRN. The value for money of the scheme has not been ensured as the options' appraisal was flawed and has not been reviewed. The scheme would be detrimental to the safety of the network, not protect or improve it. NH has failed to co-operate with the local authorities and the National Park Authority over a number of issues. It has also failed to minimise environmental impacts – carbon emissions would increase; traffic would impact adversely on two adjacent villages, on Glossopdale, on the Peak District National Park; the proposed infrastructure is out of proportion to and would disfigure local landscape and townscape. Consequently the scheme does not conform to the principles of sustainability. This is reflected in NH's non-compliance with Government policy in NPSNN, the Treasury's Green Book, UK Net Zero Strategy, Decarbonising Transport, Bus Back Better, Gear Change and NPPF.

(D) FAILURE TO HAVE REGARD TO GUIDANCE IN THE LICENCE

Licence Para 5.15 It should seek to ensure protecting and improving safety is embedded into its business decision making, and to achieve the best possible safety outcomes.

93 The 2015 Trans-Pennine Routes Feasibility Study included a safety objective, against which the scheme scored +1 (beneficial impact). For the 2020 statutory consultation and for the DCO application the safety objective was omitted, despite high accident rates and accident clusters along the route, as safety measures were progressed separately from the scheme (the A628T Safety and Technology improvements). However, as these

measures were included in the baseline traffic modelling and road crashes increased, the mitigation appears to fail. Thus the evidence suggests safety was not embedded in the decision-making for this scheme, which would now score negatively (adverse impact) against such an objective.

Licence Para 5.23 It should ensure protecting and enhancing the environment is embedded into its business decision making.

94 NH did not avoid the Peak District National Park when planning the SRN as required by NPSNN 5.152.

95 There was no scheme objective to address GHG emissions or climate change despite the 2008 Climate Change Act and the UK's legally binding carbon budgets.

Summary of noncompliance with guidance in the Licence

96 Although these licence conditions are considered guidance, rather than statutory directions, they are extremely important. They are both concerned with business decision making which starts with options' appraisal, followed by scrutiny by DfT. Unless the initial appraisal is robust and scrutiny is rigorous the result will be a poor choice. The A57 Link Roads have been developed as a standalone scheme in order to build demand for the next section of new road. For fifty years NH and its predecessor organisations have been trying to force road building to link Manchester and Sheffield rather than address the transport issues within their strategic context. The Peak District National Park designation, through which the A628T corridor passes, does not permit major development unless there are exceptional circumstances and it is in the public interest. Most recently the climate and nature emergencies, and the experience of the Covid pandemic, also challenge the business-as-usual model of building roads to meet future traffic demand. The 50 year history of failed road solutions should be indication enough that what is required here is a fundamental rethink. The National Park designation and more recent events demand it. That is the context within which these licence conditions should be considered.

(E) CONCLUSION

97 We have documented above a catalogue of NH's non-compliance with the statutory directions and guidance laid down by the SoS in its licence. NH has evidently failed to meet baseline requirements, never mind meet higher expectations. The whole sorry story casts strong doubts on the credibility of NH and its evidence for the A57 Link Roads DCO application.

98 NH withheld crucial information, gave inconsistent, inaccurate or misleading statements and answers through the statutory consultations and the EiP. It repeatedly tried to

wriggle out of accountability for the scheme with obfuscation and delay. This is contrary to behaviour expected of a public agency to be as open as possible about all its decisions and actions, and to restrict information only when the wider public interest clearly demands.

99 The development of the scheme, from the 2015 feasibility study out of which it emerged to the DCO application, demonstrated all that the Treasury Green Book identified about the failure of project sponsors to engage properly with the strategic context in which their proposal sits. With respect to the A57 Link Roads NH failed to address (a) the proposal's specific contribution to the delivery of the Government's intended strategic goals in 2015 (such as climate change) and in 2021 (such as levelling up and net zero); (b) the specific social, environmental and economic features of Greater Manchester, Glossopdale, Longdendale and the Peak District National Park and how the intervention would affect them all; and (c) a raft of other strategies, programmes and projects with which the scheme would interact from the national to the more local. These ranged from addressing climate change and road safety - both key policy areas identified by the ORR for RIS3⁷⁰ - to Greater Manchester's transport decarbonisation programme through its Right Mix policy, and the PDNPA's goals to reduce traffic within, and through, the National Park.

100 The consequences of both NH's behaviour towards engagement with stakeholders and the public, and its failure as the steward of the long term sustainable future and integrity of the strategic road network, led to multiple areas of non-compliance with its licence conditions. These were demonstrated through the statutory consultations which failed to follow best practice; the transport assessment accompanying the DCO application which failed to meet the standard expected of a WebTAG compliant appraisal; the failure of the proposed scheme to conform with the principles of sustainable development; and finally through the EiP, the effectiveness and efficiency of which was compromised by NH's omissions and obfuscations. At the end of the EiP the ExA was still asking fundamental questions about NH's evidence, and new evidence that conflicted with NH's evidence was presented and left unscrutinised. The result is that neither the ExA nor the SoS have the information needed to weigh up the planning balance. The overall effect is to limit democratic involvement and accountability.

101 The ORR has recently identified that where projects fail to be delivered on time, most of the delays occurred during the development phase – before construction begins. Statutory planning processes were one of the four most prevalent risk factors. In our experience it is not the statutory planning processes, red tape or regulations which

⁷⁰ Road Investment Strategy 3 Our role and approach, May 2022, ORR, 3.4a and 3.4b
<https://www.orr.gov.uk/search-news/gearing-third-road-investment-strategy-ris3> ;
<https://www.orr.gov.uk/sites/default/files/2022-05/Road-Investment-Strategy-3-our-role-and-approach-2022-05-04.pdf>

have hindered the effectiveness of the A57 Link Roads DCO application and its EiP but NH's approach and behaviour towards consultation and the planning system. Any subsequent delay to delivery of the scheme - the scheme is at risk of missing its start of work commitment⁷¹ - can be laid wholly at NH's door, through its behaviour, its attempts to conceal the real effects of the scheme, its failure to engage robustly in discussions, its failure to have due regard to its legal duties and Government policy, its failure to plan within the appropriate strategic context.

102 These shortfalls in performance do not appear to be picked up when monitoring NH's performance. Although the key performance indicators (KPIs) test how well NH manages traffic on the SRN and how quickly it delivers its enhancement projects, they do not robustly test NH's role as the steward of the SRN's long-term future and integrity, fit to meet all the challenges of this century in a sustainable way⁷². For example, in the 2021-2022 assessment of performance, the focus is on individual project delivery with no mention of the strategic context of wider Government policy⁷³. Consequently, there does not appear to be a robust framework for monitoring all of the licence conditions.

103 Some of the non-compliance we have documented e.g. taking a piecemeal approach to addressing issues along a corridor instead of strategic long term planning, raise fundamental issues not only about the preparation of the RIS by DfT and of route strategies by NH, but also about the testing by DfT of potential projects as they pass through their development stages. The final stages for an NSIP - the statutory consultation and the DCO application - are deeply flawed. To have received holding objections from the statutory consultees in response to the 2018 consultation on the scheme, and to have not addressed those concerns before holding another statutory consultation smacks of both incompetence and disregard for standards of best practice. An effective approach would have been to address all the statutory consultees' concerns and to then seek public views before proceeding to a DCO application. Development of a NSIP should be front loaded with a WebTAG compliant transport appraisal and full environmental impact assessment available for public scrutiny before the formal DCO process is entered. The EiP would then be able to proceed as it appears to have been envisaged – to iron out technical issues with planning agreements. In view of what we have experienced we believe a review of all these processes is required and that monitoring of them should be more robust.

104 Two key areas are highlighted by the evidence we have presented - environmental issues and engagement with stakeholders, organisations and the public. Environmental impacts and objections on environmental grounds are a key risk to the achievement of

⁷¹ Annual Assessment of NH's Performance 2021-2022, ORR, July 2022, Table B11

⁷² Annual Assessment of NH's Performance 2021-2022, ORR, July 2022

⁷³ Annual Assessment of NH's Performance 2021-2022, ORR, July 2022

planning consents for road schemes⁷⁴ yet environmental issues are not addressed through the RIS and only at a late stage of the NSIP process when the DCO application is submitted. This means adverse impacts are only picked up very late through a process which is not geared to addressing fundamental issues, only to tinkering around the edges. The entire programme being considered for RIS3 (whether carried over from RIS2, or new schemes) must be assessed within a Strategic Environmental Assessment as required by the Infrastructure Act 2015 and the Strategic Environmental Assessment Directive. Schemes should not enter the RIS unless they have been subject to a full and proper appraisal. Once chosen the options appraisal should be regularly reviewed to ensure the scheme remains the best performing, sustainable and cost effective option. The full environmental assessment and the transport appraisal on which it is based should be the subject of scrutiny through the statutory consultation, as we have noted above.

105 With respect to engagement there is no KPI. A review two years ago⁷⁵ of NH's engagement and cooperation with regional and local partners, but not the public or communities, concluded that *'Highways England is complying with the prescribed elements of its licence engagement duties but there is scope for further development of its duties to support regional and local stakeholders and manage their expectations'*. It specifically drew NH's attention to *'recognition of the obligations and priorities of local stakeholders, for example in areas such as decarbonisation and air quality'*. Through the A57 Link Roads, NH's response to stakeholders concerns was the reverse of the ORR's advice – it denied their significance and/or their legitimacy to be considered, of which the most extreme examples were to take no account of Greater Manchester's well developed approach to decarbonisation through radical changes in travel behaviour, or of the views of the statutory authority for the National Park, the PDNPA. Our experience also showed how poorly NH has failed to engage with communities and the public. Engagement must be formally addressed and monitored, as engagement worthy of a public body applies to all elements of the licence. The ORR has promised to review assessment of engagement as part of NH's RIS2 and RIS3 plans⁷⁶ but this should be extended to cover community and the public's engagement in project development.

106 NH receives huge sums from the public purse - in financial year 2020-2021, it spent £160,527,000 on staff and £3,198,000 on consultancy fees⁷⁷ - and is responsible for spending the £24billion committed to the 2020-2025 roads' programme. For that the public would expect NH's performance to at least meet the requirements of the licence, if not the extra mile, and for robust monitoring of that performance.

⁷⁴ Road Investment Strategy 3 Our role and approach, May 2022, ORR, para 3.50

⁷⁵ Review of Highways England's engagement approach with regional and local partners, June 2020,

⁷⁶ Road Investment Strategy 3 Our role and approach, May 2022, ORR, 3.71c

⁷⁷ Highways England Annual Accounts and Reports 2021

107 With respect to the A57 Link Roads we therefore urge the ORR to assess NH's performance in the light of this representation to you and report its findings to the SoS before he makes a decision on the scheme in mid-November 2022. More generally we urge the ORR to enforce behaviour that is expected of a public body and to review the overall monitoring of NH's licence. In particular, we suggest that the ORR a) reviews development of DfT's RIS and NH's route strategies to ensure that schemes that arise from them meet all the criteria for sustainable development, especially with regard to the climate and nature crises; b) insists on, or provides, much more robust assessment and monitoring of scheme development from options appraisal through to project business case; and c) reviews or instigates a review of the complete NSIP process.

APPENDIX A

OMISSIONS AND MISREPRESENTATIONS IN 2020 STATUTORY CONSULTATION

- a. There was no transport assessment, traffic data or traffic modelling results; this despite the SoCC p5 promise of *'more information about key environmental impacts including air quality, noise and traffic.'* Later when presenting draft traffic information to the local authority steering group NH⁷⁸ *'confirmed this was the data presented within the Preliminary Environmental Information Report (PEIR)'*. No traffic data was presented in the PEIR or available to the public until the DCO application was submitted.
- b. There was no mention in any of the documents of the impacts of increased traffic, all generated by the scheme, on Glossopdale. This would lead to rat running on residential streets to avoid congestion on the A57 through Glossop. People were unaware that, with the scheme, the walk or cycle to school, work or the shops would become more intimidating, dangerous and unpleasant; congestion would increase journey times for drivers within Glossopdale; road crashes would increase. The FAQ gave the opposite impression. *'Will the scheme create traffic in other areas? What about Glossop?'* was answered as *'Our traffic assessment shows that overall, the scheme draws traffic on to the strategic road network and off local roads. Therefore we wouldn't expect to see a significant increase in traffic through Glossop during peak times.'* This misrepresentation was only revealed through the EiP.
- c. The infrastructure for the scheme lies within the National Park setting and ~2km from its boundary. There was no mention of the increased traffic on trans-Pennine routes through the National Park or its impacts on tranquillity, wildlife and road crashes, again all only revealed through the EiP.
- d. The whole scheme lies within and crosses the Green Belt yet the word Green Belt appeared only once in - PEIR Vol 3 with respect to the Planning Act 2008. There was no mention of the strict policies surrounding Green Belt, no map of the Green Belt, no mention of the scheme's profound impacts on four of the five functions of the Green Belt and its harm to openness, as revealed by the EiP. Of all planning policies, Green Belt is the best known, best loved and best understood by the general public but it was completely excluded from all the consultation documents.

⁷⁸ APP-026 Consultation Report [Table 3-2] accompanying the DCO application, published July 2021

- e. Safety was only addressed in the FAQ where a misleading impression was given. Improving safety for road users was described as a key objective of the A57 Link Roads, but there was no such objective. Safety benefits improvements were implied: *'Our traffic assessment shows the scheme reducing accidents across the local area, because traffic will be moved onto more modern roads.'* There was no mention of the increased risk of road crashes in Glossopdale and on trans-Pennine routes which came to light in the DCO application.
- f. The economic justification for spending £225m (later reduced to £180m) on the scheme was not made. The statement in the brochure that congestion *'restricts potential economic growth, as the delivery of goods to businesses is often delayed and the route is not ideal for commuters, which limits employment opportunities'* was not informed by evidence.
- g. The colour brochure showed prejudicial bias. It focused to the exclusion of all else on the immediate benefits to residents in Mottram and on Woolley Lane and on the engineering and design changes made since the 2018 consultation. There was no mention of Glossop as a township that might be affected by the scheme – the word Glossop appeared only twice in the brochure to explain that the *'Glossop bound'* traffic would be separated. There was not a single mention of GHG/carbon emissions despite the all-pervasive climate emergency and the fact the scheme would increase these emissions. There was no mention of road safety or of the adverse impacts on the Green Belt. With more pressing issues such as the Covid pandemic on people's minds, the brochure is likely to have been the only document the majority would have read. Its systematic distortion and concealment of the scheme's effects misinformed people as to the effects on their well-being and quality of life.

APPENDIX B

OMISSIONS AND FLAWS IN TRANSPORT ASSESSMENT REPORT

a. Traffic modelling – No details appeared in the TAR. In three and a half pages it named the modelling software and used three figures to show the modelled area and local zone disaggregation. There was no local model validation report, no forecasting report, no options report, no strategic case report, no economic case report, no appraisal summary table.

(i) Assumptions and factors which were built into the model and the values ascribed to these factors were not available to stakeholders or to the ExA.

(ii) No information was available as to how public transport, walking and cycling were dealt with in the model. Late in the EiP NH revealed that only rail trips for households with a car were included. NH continued to confuse the definitions between rail, public transport as a whole, trips which were included or not included in the model and in fact how the limited rail modelling was undertaken [REP9-040, Q3.4, page 5].

(iii) The source of errors in terms of model parameters and specification were concealed from the EiP. NH stated⁷⁹ they were captured in the high and low growth sensitivity tests but provided no details.

(iv) The impacts of the scheme on transport networks in Greater Manchester, despite the majority of journeys being within it, were not presented. Later NH revealed that the scheme was treated as an isolated bypass with limited access to Greater Manchester, with a fixed cost function and masking applied to Greater Manchester within the model.

(v) Data from various sources was used to calibrate the model but how it was applied was not fully explained or given in sufficient detail. Conflicting statements were made about updating the model⁸⁰.

(vi) Inconsistencies in the outputs from the model remained unexplained at the end of the EiP on a number of routes through and within Glossop, Hadfield and Padfield, and along the A628T⁸¹. NH dismissed IPs' attempts to understand these as mistaken⁸² but failed to supply

⁷⁹ REP11-010, 3.3. NH response to ExA's Third Written Questions

⁸⁰ APP Data was collected during 2020-2021 according to the Case for the Scheme 4.3.5 and 4.3.6 for model development. NH refuted this and said only 'historic' data was used REP9-027/9.79.111

⁸¹ REP8-034, 9.69.16; REP9-043; REP10-012, pp 2-3

⁸² REP9-043 Response to PD-014 - Report on Implications for European Sites

a valid explanation for the majority of these or to provide specific data to validate its arguments.

(vii) The EIA Regs Schedule 4 para require *'a description of the relevant aspect of the current state of the environment (baseline scenario)'*. This is essential to understanding the current traffic situation and how it would change with the scheme. With the impact of Covid 19, the most recent actual traffic flows would be 2019. Instead NH used traffic surveys from 2015-2016 and modelled them to create the 'do minimum' scenario in 2025 against which to test the impacts of the scheme. This is not a 'current baseline' and led to a number of discrepancies when comparing the 2025 'do minimum' with existing counts from the DfT traffic website – some flows were much greater, others much lower.

All the above led to enormous problems with understanding the outputs from the traffic model.

b. Road crashes – The TAR, like the consultation documents, maintained there would be *'reduced safety risks within the built up area...'* (TAR Executive Summary). The built up area includes Glossopdale where High Peak Borough Council's Local Impact Report [REP2-046] showed an increased risk of road crashes on residential roads in Glossop. NH excluded from assessment residential roads on *'which the scheme is not expected to have an impact'⁸³*, roads which we now know through the EiP process, and which NH knew when it submitted the DCO documents, would have more traffic as a result of the scheme and therefore more crashes. The evidence presented in the TAR is the shockingly poor Figure 7.8 of the spatial distribution of safety impacts (the scheme incurs a safety disbenefit of -£7.32m over 60 yrs) which is too crude to decipher in the built up areas.

c. Severance – the word does not appear in the TAR. In Environmental Statement (ES) Ch12 NH's concern is wholly with severance of land holdings and reducing community severance on the bypassed A57T⁸⁴. Nowhere is NH concerned with the severance experienced by those attempting to cross the A628T in Hollingworth or Tintwistle (despite the *'high number of pedestrian accidents'⁸⁵*), the A57 through Glossop or residential roads in Glossopdale where traffic generated by NH's scheme would increase.

d. HGVs –The high percentage of HGVs along the trunk route subjects people, communities and the fabric of buildings adjacent to the road to severe impacts. The TAR barely addresses the issues⁸⁶. The scheme removes HGVs from part of the A57T but not from the A628T through Hollingworth and Tintwistle or from the A57 through Glossop. Yet the TAR does not

⁸³ TAR Figure 3.8 The Case for the Scheme 4.5.2;

⁸⁴ ES Ch. 12. 12.9.84

⁸⁵ Trans-Pennine Routes Feasibility Study 2015, Stage 1 Report 1.2.11

⁸⁶ TAR 1.1.2, 3.7.14 HGV percentages and numbers are given in Table 3.8 and Figures 3.6, 4.8, 7.1, 7.2, 7.5 and 7.6.

address their potential diversion to avoid congestion along these routes, or the severance, the intimidation, the risk of road crashes, the disincentive to walk or cycle on these routes that HGVs impose. NH's only concern is for the small length of the trunk road that would be bypassed. This is in direct contradiction to NPSNN's insistence at para 5.202 that impacts on local road networks must be taken into account.

e. Journey time savings – The TAR spells out the importance of journey time reliability (para 1.1.1), which features in the scheme's objective for connectivity (para 1.2.1), and provides monetised benefits worth £11m (para 7.2.6). Despite their significance, journey time savings were presented only as partial parts of journeys, not actual journeys the travelling public would make. Journey time savings on the SRN between Manchester and Sheffield were given for a 10-mile stretch of a 40-mile journey between the city centres and avoided the congestion that would be met within both urban areas. NH's main argument was to claim¹³ that journey times are captured in the modelled road network, which is no substitute for presenting specific evidence. The reason for NH's resistance became clear when it revealed Sheffield to Manchester journey time savings as ~5 minutes [REP5-022, 9.54.64]. This answer meant that claimed city-to-city journey time savings would be significantly reduced - for the 10-mile stretch eastbound savings were predicted as 8-10mins and westbound as 5-6mins – which would substantially reduce the value for money of the scheme and hence the Benefit Cost Ratio.

f. Public transport – There was no assessment of the potential for car journeys to switch mode to public transport, or of the time delay that would be experienced by bus passengers on routes which would see increased traffic. In TAR 3.4.11 NH claimed bus services '*will benefit from improved journey times and reduced congestion*'. This was revealed as a misleading assertion without evidence; in response to the ExA's questions⁸⁷ NH admitted it had not assessed bus times. Bus journey times should have been supplied in the TAR. When they were finally supplied [REP6-017 Appendix A] some improved and some took longer with the scheme.

g. Impacts on Glossopdale – we have detailed these above. The TAR referred only to journey times from Glossop (para 7.1.16) and to '*small increases in accidents through Glossop*' (para 7.2.13), by implication on the A57. Repeated requests for a proper assessment using a local model were refused, despite the requirements of NPSNN 4.2.

⁸⁷ REP7-020 Response to ExA's Written Questions, question 3.14, pp 28-29

APPENDIX C

WITHOLDING OF CRUCIAL EVIDENCE DURING EXAMINATION OF DCO APPLICATION

a. Assessment of public transport

This was important in view of the strong policies in Greater Manchester for radical reduction of car trips and increased travel by public transport, walking and cycling. In order to understand how NH had assessed travel by all modes it was necessary to know how the traffic model dealt with this. This was not disclosed by NH until 5th April Issue Specific Hearing (ISH) despite constant reference to public transport in our emails, at technical meetings, and through requests for clarification. When we first asked NH in July 2021 how public transport was included in the model, we were referred to the transport modelling and forecasting reports submitted with the DCO. As stated above (Appendix B a.) there were no transport modelling or forecasting reports submitted with the DCO, only the TAR which told the reader nothing about how public transport was assessed. Furthermore neither the Transport Modelling nor Transport Forecasting Packages⁸⁸ supplied to us in November 2021 contained that information. Despite two meetings with NH, we were still asking for clarification in March 2022. To aid progress MTRU asked NH to confirm our understanding with a suggested statement for us to agree with NH within a SoCG: *“The model contains public transport trips by people who have a car available but not by other users. In addition, only trips with either an origin or destination in the Area of Detailed Modelling are actively modelled. All other public transport trips are fixed.”* We received no reply and were only answered orally during the ISH on 5th April and by writing [REP8-018 page 55]. However, even that answer contained obfuscation as there were apparently two traffic models for the scheme – a regional mode choice transport model to forecast mode shift and a traffic model.

b. Review of appraisal options

(i) In order to establish if the scheme continued to be the best option since it was chosen in 2015, it was important to establish if a strategic level re-assessment of options had been undertaken since the original sifting of options in 2015⁸⁹. The Treasury’s Green Book 2020 advises that options should be checked at each stage of the Business Case process, updating of the appraisal options is expected for all schemes in the RIS⁹⁰, and since 2015 addressing the climate and nature crises has become urgent. Another strong reason for review was the lack of a suitable traffic model for the 2015 Study. As a result the Study noted (Stage 3

⁸⁸ REP2-090 – Transport Modelling Package pdf pp 98/790; Transport Forecasting Package pdf page 256/270;

⁸⁹ A57 Link Roads 6.3 ES Chapters 1-4 Introductory Chapters Planning Inspectorate scheme reference: TR010034 Application document reference: TR010034/APP/6.3 para 3.3 Page 97 of 134

⁹⁰ RIS1 2015-2020 para 2.12; Treasury Green Book November 2020

Report 4.2.17) there is *'a risk that forecasts developed using a new traffic model may differ from those produced as part of this assessment.'*

(ii) NH's answers when questioned on this matter were changeable. It first confirmed in August 2021 *'that we have not repeated the Early Appraisal Sifting Tool (EAST) since finalising the options in 2015'*. It then used timing as an excuse not to undertake the review - *'The updated Green Book postdates consideration of alternatives to the Scheme and selection of the preferred option'⁹¹* - ignoring the fact that the need for review continues after selection of the preferred option. When questioned by the ExA, NH then claimed it had undertaken a review, using changes to design or exclusion of certain elements⁹² which is not what a strategic review of the options appraisal is about. When challenged on that argument it reverted to its original position of not having undertaken a review because *'it would not be practicable'⁹³*. We therefore concluded that NH had not undertaken a review as required by RIS and the Treasury Green Book. Trying to show it had undertaken the required review when it had not emphasised how poorly NH has followed procedure and how it sought to conceal this from the EiP.

c. Explaining the spurious traffic data

(i) The outputs of the traffic model, i.e. the predicted traffic flows and their distribution, nature and composition, were fundamental to all the evidence about the scheme's effects on the transport networks, on road safety and on the environment, society and the economy. Clarity is required on both the model's limitations and its outputs. Our lack of confidence in the modelling and its results increased throughout the EiP, was shared by other interested parties (IPs), and was comprehensively expressed through a joint letter to the ExA [REP10-017]. It was also shared by the Peak District National Park Authority⁹⁴ and by High Peak Borough Council⁹⁵.

(ii) Initially NH relied on blanket statements that it had absolute confidence in the traffic modelling, which is no substitute for open, comprehensive and consistent presentation of data and for engaging with challenges constructively. Later it described the process in some detail but the outputs – the spurious and extraordinary traffic modelled results - were not explained. It persisted with addressing questions about content with answers about methodology. It used arguments that did not withstand scrutiny and, when challenged, provided the same arguments. It failed to engage with substantive evidence submitted by us and others, and provided vague and unintelligible answers to questions. This severely impeded understanding of the traffic data and the scheme's impacts and led to the ExA asking serious questions about the traffic modelling even as the EiP closed.

⁹¹ REP7-025, 9.69.8

⁹² REP8-019, 9.75.34

⁹³ REP10-010, 9.84.13

⁹⁴ REP2-048 Local Impact Report 7.2.1

⁹⁵ REP2-046, High Peak Borough Council Local Impact Report, 19.1

(iii) Three working days before the EiP closed, NH supplied some explanation as to the disparities between some of the DfT observed traffic flows and modelled traffic flows in the 'do minimum' 2025 scenario [REP11-010, 3.1 page 13]. These explanations exposed local zone limitations as the cause of some of these disparities. These limitations are a good reason for using a more defined model of Glossopdale, something we and others had repeatedly requested throughout the EiP and been denied, and which NPSNN 4.2 requires.

(iv) Public interest in the integrity of the traffic modelling was extremely important for this scheme. The 2007 public inquiry into the Mottram-Hollingworth-Tintwistle bypass (the previous iteration of the scheme) was formally adjourned in December 2007 after 10 days of hearings due to serious flaws and repeated errors with the traffic model. Revised traffic figures due to an error in the traffic modelling were followed by further inconsistencies in feeding data into the traffic model⁹⁶ which ultimately rendered the results of the model null and void. The statutory consultees were unable to validate the traffic model and the public inquiry was formally closed in March 2009.

d. Uncertainty Log

NH's failure to engage constructively is also well demonstrated by its approach towards our challenge of the Uncertainty Log. In our written representation [REP2-069 4.2.11-4.2.17] we raised issues about the Uncertainty Log with respect to future development. A limited list was appended to the ES Ch.15 on Cumulative Effects. We found a much longer list in the Traffic Forecasting Package NH supplied to us [REP2-090, Appendix B, pdf pp 337/790]. We compared the results given in the DCO application documents with those available in the Traffic Forecasting Package, pointing out data was missing and asking for clarification on how the model had addressed future development. NH offered '*Details of the schemes and developments listed in the Uncertainty Log can be provided by National Highways if necessary*'. We responded '*As offered, please may we see the complete list, ie the long list and the short list, of schemes and developments excluded and included in the Uncertainty Log*⁹⁷'. NH responded⁹⁸ '*The uncertainty log is included in Appendices B & C of the Traffic Forecasting Report that has previously been provided by National Highways to CPRE*'. These were the very appendices which we had analysed in REP2-069 and to which we were seeking details and clarification. This circular game playing by NH was obstructive and did not address our concerns.

e. Investigation of Mottram Gyratory Flow (MGF)

⁹⁶ Mottram Tintwistle Public Inquiry 2007 HA-73 December 4th 2007; the Highways Agency announced that no more information would be available until late February 2008. It failed to meet this deadline and further deadlines in May 2008 and then October 2008.

⁹⁷ REP5-028, page 10

⁹⁸ REP7-025 9.69.18 page 14

One IP Mr Bagshaw presented the MGF as an alternative to the scheme. When asked by the ExA if the MGF alternative had been considered previously NH's response was an unequivocal 'No'⁹⁹. *'The Mottram Gyrotory Flow alternative presented in Mr Bagshaw's submission was not one of the alternative options considered by National Highways'...* *'The scheme previously proposed and presented in Mr Bagshaw submission was not one of the potential alternative solutions identified through this process'*. Towards the end of the EiP¹⁰⁰ the ExA was obliged again to ask NH to clarify its position as to whether the MGF, or a similar scheme was considered through options appraisal. The NH completely reversed its reply both orally at the hearing and in writing to a definitive 'Yes'. *'The option submitted by Mr Bagshaw was presented as an alternative scheme at the public inquiry of 2007. A scheme looking at a gyrotory system in the area of Mottram was assessed in 2015 as part of the EAST study; these were forwarded on to the DfT for consideration but were not included in RIS1¹⁰¹'*. Thus two directly contradictory answers were given by NH. Mr Bagshaw then showed that it had not been examined as a standalone option but only as an addition to the current scheme (REP8-042 para 5 pp 5-8).

f. Increase in vehicle kms

Both the TAR (7.2.9) and ES Ch.14 Climate referred to increases in vehicle kilometres generated by the scheme but no absolute figures were given. NH twice gave the opposite impression: *'Total vehicle kilometres across the appraised road network are effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic... and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys¹⁰²'*. Only in response to a question from the ExA, on 13th April (10 months after we originally asked for the figures) did NH reveal the increases in total vehicle kilometres due to the Scheme would be +0.7% (on approximately 12,000,000 daily veh-km in 2025) in the area of detailed modelling and +9.5% (on approximately 410,000 daily veh-km in 2025) in the Local Study Area¹⁰³. NH not only refused to supply the absolute figures to us but also denied there would any increase in vehicle kilometres.

g. A sensitivity test on the carbon emissions

NH submitted the results of the test but did not make the methodology of the test available¹⁰⁴. Nor did NH explain how the test affected the significance of the carbon emissions associated with the scheme. The validity of this test awaits DfT approval at some

⁹⁹ REP6-017 NH responses to ExA's second written questions Q3.8a

¹⁰⁰ REP8-019 Issue Specific Hearing 9.75.34 (kk) page 20

¹⁰¹ REP8-019 NH written summary of oral hearing 9.75.34 (kk) page 20

¹⁰² REP1- NH response to Relevant Representations RR-0543 page 147, 1st December; REP2-022 4.1 page 59

¹⁰³ REP8-019, 9.75.6

¹⁰⁴ REP5-026 2.2.5 onwards and Table 1; REP8-018 Appendix A

time in the future. Given this, it was incredible that this data was provided to the ExA as if it might add value to the ExA's recommendation to the SoS.

h. Visibility of the eastern portal of the underpass to the public

ES Ch.7, 7.9.25 implied that the eastern portal of the Mottram underpass would be visible from publicly accessible viewpoints. *'Views represented by Viewpoint 5 would be more open, with visibility of the new underpass structure and the cutting slopes present at the eastern portal'*. During site visits we searched from around Viewpoint 5 (on a public right of way) for visibility of the underpass structure but could not find it, and requested an accompanied site visit to view the eastern portal. In response NH considered *'that **all parts of the Scheme can be viewed from publicly accessible land, and thus we do not consider that an Accompanied Site Inspection will be required**¹⁰⁵'* (our emphasis). When we asked NH (email 22nd November) from where a full view of the eastern portal could be seen, it responded (21st December 2021) *'the only views of the eastern portal would be visible from private agricultural land containing no sensitive receptors'*. This is a complete contradiction to *'all parts of the scheme can be viewed from publicly accessible land'*.

i. Godley Green Garden Village (GGGV)

(i) GGGV is the largest proposed development within Greater Manchester, is included in Greater Manchester's emerging spatial framework Places for Everyone and would lie 1Km from the scheme on a road that joins the M67 J4 roundabout, at the western end of the scheme. The allocation is proposed to deliver 2,350 dwellings and would generate approximately 529 to 1,057 two-way vehicle trips during peak hours¹⁰⁶. Clearly this is a major development which would interact with the scheme. NH's approach towards the scheme's interaction with GGGV provided two diametrically opposed stances.

(ii) NH's assessment¹⁰⁷ for the DCO application records *'no significant cumulative effect'* as a result of the scheme with the GGGV development, a conclusion which is directly contrary to the Places for Everyone assessment in which NH participated. The latter records that traffic generated by this allocation is *'likely to result in material implications on the operation of the SRN that would require mitigation*¹⁰⁸ *'* at both the M67 J4 roundabout and M60 J24

¹⁰⁵ PDL-001 Letter dated 1st November 2022 to ExA regarding the Preliminary Meeting of the Examination

¹⁰⁶ 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

¹⁰⁷ ES Ch.15 Table 15-7 row 42

¹⁰⁸ 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

Denton Island¹⁰⁹ which lies 5-miles west of the scheme along the M67. Outside the EiP NH behaved as if the scheme would have significant effects: in response to TMBC's 2021 planning application 21/01171/OUT for GGGV, NH submitted a formal recommendation¹¹⁰ that planning permission is not granted for a specified period, as it did not have '*sufficient comfort that the development would not cause a detrimental impact to the SRN.*' The conclusions that NH reached in regard to the scheme's cumulative effects with GGGV are contrary to those evidenced by PfE and its own response to the planning application.

j. Transport for Greater Manchester's SOCG with NH

A prime example of delay is the handling of the SoCG between NH and TfGM. The initial version indicated TfGM was concerned with detailed design of traffic management [APP-192] but the second version in January 2022 briefly alluded to concerns about strategic planning issues [REP2-019]. The nature of the latter were not revealed until the next and final version of the SoCG appeared 4 months later during the final hours of the EiP [AS-010 and REP12-010]. Several new issues and new angles on known issues were disclosed as of concern to TfGM, all too late for scrutiny within the time frame of the EiP.

¹⁰⁹ 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

¹¹⁰ https://publicaccess.tameside.gov.uk/online-applications/files/9976136762C94B11142AEDBDD186C191/pdf/21_01171_OUT-CONSULTATION_RESPONSE_-NATIONAL_HIGHWAYS-1539049.pdf

LOW CARBON TRAVEL FOR LONGDENDALE AND GLOSSOPDALE

CPRE Peak District
and South Yorkshire

September 2022

Summary of full report
by Keith Buchan, MTRU

CPRE Peak District and South Yorkshire
for the countryside, for communities, for the future

Registered Charity No.1094975
Registered Company No. 4496754



LOW CARBON TRAVEL FOR LONGDENDALE AND GLOSSOPDALE

What's the problem?

The Longdendale villages of Tintwistle, Hollingworth and Mottram beside the A57/A628 trunk route experience severe environmental pollution from through-traffic of heavy lorries and commuter car traffic from Glossopdale. Travel in the area generates:

- High carbon emissions from traffic. Once released carbon emissions remain in the atmosphere for about 100 years. To have any chance of meeting carbon reduction targets, emissions need to be cut as soon as possible;
- Noise, air pollution and severance created by heavy traffic on residential roads;
- Noise, air pollution, severance and landscape impacts from the same traffic in the Peak District National Park;
- Unreliable journey times;
- Poor local conditions for walking and cycling which inhibit active lifestyles leading to poor health;
- Delays to local buses;
- Long journey times between Manchester and Sheffield.

Although the proposed A57 Link Roads (dual carriageway bypass of Mottram, single carriageway link to Glossop) would reduce traffic and its associated air pollution on Hyde Road in Mottram and Woolley Lane on the edge of Hollingworth (if traffic calming measures are effective), it would increase traffic, congestion, carbon emissions, air pollution, noise, road crashes and severance in Hollingworth, Tintwistle and Glossopdale. Its claim to alleviate unreliable long journey times is unsubstantiated. The scheme's infrastructure has profound impacts on the Green Belt, would increase traffic through the National Park and requires demolition of property. In order to avoid all these impacts CPRE the countryside charity sought a solution that would benefit everyone.

How would *Low Carbon Travel* address the problem?

A solution tailored to relieve Glossopdale and Longdendale of traffic impacts, enhance local countryside as a green lung for Greater Manchester and make door-to-door journeys by bus, foot or cycle a realistic, attractive and convenient option. CPRE's *Low Carbon Travel* includes:

- 1 Green Travel Planning for all;
- 2 Weight restriction of through traffic of heavy lorries;
- 3 Returning streets to the people;
- 4 Reshaping bus services with improved services and electric buses;
- 5 Linked traffic signals and new crossings to slow traffic and facilitate walking and cycling.

1 Green Travel Planning for workplaces and residential areas to:

- Inform people about existing alternatives to car use;
- Identify the barriers to using the alternatives;
- Develop improvements to bus services based on responses;
- Better integrate rail and bus services;
- Identify places for new cycle and walking routes;
- Pilot bike and e-bike deliveries from local shops;
- Implement the improvements, monitor and modify when needed.

2 A weight limit on through-traffic of heavy lorries (HGVs) across the Peak District National Park – this would force drivers to use the motorway box M1/M62/M60/M6/A50 around the area, significantly reduce traffic queues and free up road space for active travel. Reducing the numbers of lorries is extremely popular locally, and would require cooperation across a number of local highway authorities and enforcement of the weight restriction. Local businesses and local deliveries would not be affected. Such control schemes are feasible with Automatic Number Plate Recognition (ANPR), as in the London low emissions zone covering the whole metropolitan area and applicable to all lorries of 3.5 tonnes and over.

The control system could remove the heaviest HGVs which make up 90% of the through traffic or be set to remove all HGVs (over 7.5 tonnes). It would:

- Reduce the environmental damage and external costs (those met by public spending rather than by the operator of the vehicles): the largest HGVs are extremely damaging and cause much more noise, vibration, emissions and particulates than other vehicles. The most extreme example is damage to the road surface – the heaviest vehicles cause 180,000 times more damage than a car. Motorways are designed to minimise such external costs;
- Encourage streamlining of goods transport. Diversion of HGVs to longer routes would increase the costs of the current model used by operators. This would encourage more efficient use of vehicles, for example, minimising journeys of empty or partially empty vehicles (currently HGVs are empty for 28% of their travel).

3 Returning streets to the people – this would include slower speeds such as 20mph to make streets safe and pleasant, more space and facilities for cycling and walking with more protected road crossing points, and creation of a coherent local network for local walking and longer cycling journeys to work, school, shops, leisure, medical centres with links to Greater Manchester's Bee Network. A local group has begun the work with a focus on travel to school. E-cargo bikes would allow people to shop on-line or walk to and from the shops, and leave delivery to the e-bikes.

The public realm should be attractive and comfortable to use. Planters, benches, signalling and road surfacing would indicate that the space is shared, not for motor vehicles only (or even principally), and encourage more considerate driving.

4 Reshaping bus services – To provide integrated (bus and rail services), affordable, reliable and frequent services that meet people's needs and have priority on the road. Modern bus priority doesn't need continuous lanes – smart linked signals and bus gates achieve more for less. The package includes:

- The purchase and operation of 3 electric buses (comfortable, clean, air conditioned and with WiFi) which could be used to provide new services, for example the reintroduction of the X57 Glossop to Sheffield;
- A new service for Tintwistle, Hadfield and Glossop;
- Changes to the Woolley Bridge junction to provide a bus and cycle lane and priority entry;
- Bus gates at some pedestrian crossings to improve bus journey times;
- Introduction of incentives to tempt people out of cars and onto public transport.

5 Linked traffic signal controls – Along the trunk route and at M67 J4 modernising and introducing linked controls would improve safety, allow for bus priority without disturbing other traffic, break up queues and smooth the flow overall.

What would *Low Carbon Travel* cost?

The total costs would be £9.7million as listed below. No additional costs are given for signalisation of the M67 J4 roundabout. These would be modest if undertaken within the existing layout, but in the order of £5million if more construction work was needed.

Woolley Lane junction signalisation and provision of bus/cycle priority entry	£1,000,000
Three new signalised pedestrian crossings	£450,000
One new pedestrian crossing with bus gate	£250,000
One bus gate at existing crossing	£150,000
Two additional pedestrian phases at existing signals	£150,000
Three new electric buses	£1,000,000
Travel planning initial survey and planning	£500,000
Travel planning start up incentives 3 years @ £350k	£1,050,000
Walking route improvements (50 kms @ £5k)	£250,000
Cycling improvements (includes 50 kms plus parking and other incentives)	£500,000
20 mph speed limit plus public realm (20 kms @ £10k)	£200,000
HGV signs including advance warning on motorways	£1,200,000
Total	£6,700,000
Plus Optimism Bias 44% (a standard adjustment for underestimating costs)	£9,650,000

Would *Low Carbon Travel* provide good value for money?

Transport schemes must give value for money. For every £1 of public money spent, a scheme must provide more than £1 in the value of benefits i.e. a positive benefit cost ratio (BCR). At a cost of £181million, the A57 Link Roads has a BCR of 1.45 and is in the Government's 'low value for money' category. Our package has a BCR of 4.99, making it 'very high value for money'.

Low Carbon Travel for Longdendale and Glossopdale has been put together after talking to residents and visitors about their travel experiences and hearing their ideas for improvements. All of these ideas are currently in use – but not yet in this locality. Other measures such as a **local affordable EV car and e-bike share/hire scheme** would give people the flexibility of having access to an EV car or bike and allow them to do their bit to reduce climate emissions, without breaking the bank.

For more details please contact [REDACTED] The full report¹ can be found [here](#) .

We are most grateful to the Foundation for Integrated Transport, CPRE *the countryside charity*, CPRE North West Region and CPRE Yorkshire and Humber Region for supporting this project.



LOW CARBON TRAVEL FOR LONGDENDALE AND GLOSSOPDALE

Report by
Keith Buchan, MTRU

for

CPRE Peak District and
South Yorkshire

September 2022

A57 Link Roads TR010034
CPRE PDSY Unique Reference:
20029243

Contents

Introduction and Summary	3
Part 1: History of proposals and policies for the A628 corridor	6
Part 2: Developing an alternative package – Low Carbon Travel for Longdendale and Glossopdale	8
<i>Developing and testing Options</i>	
<i>Solving problems</i>	
<i>Overall approach: building a package</i>	
<i>Summary Package: Low Carbon Travel for Longdendale and Glossopdale</i>	
<i>Pedestrians and buses: improving access and controlling traffic</i>	
<i>Bus service improvements: an integrated approach</i>	
<i>HGV control scheme</i>	
<i>Potential overall impact of Low Carbon Travel for Longdendale and Glossopdale</i>	
<i>Costs of Low Carbon Travel for Longdendale and Glossopdale</i>	
<i>Low Carbon Travel for Longdendale and Glossopdale Cost Benefit Assessment</i>	
Part 3: Analysis of the National Highways A57 Link Roads proposal	31
<i>Modelling and the modelled area</i>	
<i>Uncertainty and the Uncertainty log</i>	
<i>Conclusions on modelling</i>	
<i>Negative impact on local and national policies</i>	
Part 4: A57 Link Roads, Low Carbon Travel and conflicts with the carbon policy framework	40
<i>Carbon emissions</i>	
<i>Costing carbon</i>	
<i>The real impact of carbon</i>	
Part 5: Conclusions	51
<i>A new approach</i>	
<i>A flawed appraisal of the A57 Link Roads</i>	
<i>Way forward</i>	
Annex 1 Extract from Local Walking and Cycling Infrastructure Plans, Guidance for Local Authorities	52
Annex 2 Initial Option Assessment 2015	53
Annex 3 Output summaries for the DfT Active Mode Appraisal Toolkit (AMAT)	54

Introduction and Summary

This report presents a sustainable package of measures *Low Carbon Travel for Longdendale and Glossopdale (Low Carbon Travel)* and considers the National Highways (NH) proposed road scheme, the A57 Link Roads, in light of five key matters:

- 1) Whether a “starting from scratch” analysis would have produced different options from the road scheme to address the area’s transport related problems. This necessitates:
 - i. the accurate definition of what those problems are
 - ii. sufficiently detailed design of an alternative package
- 2) Whether the NH proposal is the best value way of addressing the problems in the area – this requires a preliminary analysis of value for money of an alternative using current methodology
- 3) Whether the appraisal and technical justification of the NH scheme conforms to guidance and good practice, in particular dealing with forecasting and uncertainty
- 4) Whether the NH proposal supports or conflicts with established local policies for transport, climate and the environment
- 5) Whether the scheme supports or undermines latest national Government policies for transport, land use and environment, in particular greenhouse gas emissions.

It also highlights a central paradox in the NH case. It will be a theme of this report that it is not possible to encourage travel by non-sustainable modes without undermining the promotion of sustainable modes. It is even possible to quantify the extent of the undermining using the Department for Transport (DfT)’s and NH’s own economic analysis. These arguments were presented to the examination and are reproduced here. NH did not put forward an argument that this was not the case: to do so would have to ignore the fundamental laws of economics. There were arguments over the extent and how this was measured, but no evidence was given that encouraging car use did not discourage a switch from car to other modes.

Linked to this is a wider point: investment in any transport scheme whose detailed appraisal reveals they do not conform to the Government’s carbon reduction pathway should not proceed. In this case neither the baseline without the scheme or forecasts with the scheme do so. This should have been flagged up at an earlier stage before any submission for consent was made.

The draft Development Consent Order (DCO) for the A57 Link Roads was submitted to the Planning Inspectorate on 28th June 2021 and accepted for examination on 26th July 2021. The examination commenced on November 16th 2021 and closed on 16th May 2022. During the course of the examination a great deal of material was produced and this report is based on the submissions made by MTRU in that context, but also the history of CPRE producing positive alternatives to road capacity increases. The first part of the report provides some history of the different proposals and policies for the local area, the National Park, and Greater Manchester. The second focusses on the alternatives, covering issue 1 above. The third focusses on the appraisal of the NH proposal and an alternative package (issues 2 and 3). The fourth deals with issues 4 and 5 on how the NH proposal conflicts with policies in a way which a sustainable package would not.

The majority of the material in this report was presented to the A57 Link Roads’ DCO Examination, and was therefore available to the Examining Authority and NH, but in separate submissions. These are all listed below with their URLs for ease of access. The reason for producing a report now is to bring the relevant submissions into a coherent document and to add analysis that had to be undertaken after the examination closed.

Local data on public transport and HGV movements was sought from NH in order to complete the analysis but was not forthcoming by the end of the examination. No data was provided

subsequently by NH. Consequently the work has had to be completed post-examination as best we can using average data from DfT sources. We have also used methods of appraisal based on DfT tools and guidance, including the DfT Transport Data Book, WebTAG and the Active Mode Appraisal Tool (AMAT).

Overall *Low Carbon Travel* demonstrated alignment with national and local transport policies, provided wider benefits outside the immediate confines of the Mottram section of the A57, and demonstrated high value for money. It would support regional programmes such as Manchester's "50-50" plan to make transport more sustainable, rather than hindering them.

Beyond the issue of conformity with Government commitments to carbon reductions NH's assessment of the A57 Link Roads was seriously flawed in other ways, for example not conforming to current DfT guidance on how to treat uncertainty. A previous strategic assessment of alternatives in 2015 used outdated assumptions and focussed on road building options. Impacts on the National Park were underestimated or omitted altogether. A significant amount of the material revealing this was not submitted to the DCO.

It is essential that a fresh options appraisal and re-assessment of specific proposals which would meet future national and local commitments is undertaken.

Material submitted to the A57 DCO with urls

- REP2-070 Alternatives first draft – see REP12-032 for corrected Table on page 15

REP2-070 <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-000857-CPRE%20PDSY%20-%20Other-%20report%20to%20accompany%20CPRE%20written%20rep.pdf>

REP12-032 <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001556-CPRE%20PDSY%20-%20Other-%20correction%20of%20an%20error%20in%20REP2-070%20-%20revised%20version.pdf>

- REP4-016 BCR package and scheme negative impacts on Government and local policies for sustainable travel

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001044-CPRE%20PDSY%20-%20any%20outstanding%20comments%20on%20Written%20Representations%20received%20for%20Deadline%202.pdf>

- REP4-031 Response to ISH 2 with Annex

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001045-CPRE%20PDSY%20-%20Other-%20response%20to%20ISH%202%20and%20written%20summary%20of%20oral%20submission.pdf>

- REP5-028 Rebuttal NH comments – supplementary note on traffic benefits page 12

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001078-CPRE%20PDSY%20-%20comments%20on%20submissions%20for%20Deadlines%203%20and%204.pdf>

- REP6-033 New model runs for carbon KB comments

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001154-CPRE%20PDSY%20-%20Other-%20response%20to%20REP5-026%20&%20ExA%20WQ2%20Q8.2%20Cumulative%20Carbon.pdf>

- REP7-034 How does the model include public transport

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001222-CPRE%20PDSY%20-%20Keith%20Buchan%20How%20does%20the%20model%20include%20Public%20Transport%20F.pdf>

- REP7-035 Response to NH comments in REP6-033 on carbon and showing scheme is within a major conurbation

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001223-CPRE%20PDSY%20-%20Keith%20Buchan%20response%20to%20REP6-033.pdf>

- REP7-036 Response to NH REP6-017 Scheme BCR and sustainable travel policies pp1-4

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001221-CPRE%20PDSY%20Response%20to%20NH%20REP6-017%20Answers%20to%20WQ2.pdf>

- REP8-033 written summary of hearings KB Compatibility of scheme with Government and local policies for sustainable travel and carbon emissions; summary of scheme impacts

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001364-CPRE%20PDSY%20-%20written%20summaries%20of%20oral%20submissions%20at%20hearings.pdf>

- REP8-045 Clarification following ISH 3 Item 2 policy and transport pp 1-2

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001365-CPRE%20PDSY%20-%20Other-%20submission%20for%20clarification%20following%20ISH3.pdf>

- REP10-013 comments on submissions for D9 Fixed cost function and masking pp1-3

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001475-CPRE%20PDSY%20-%20comments%20on%20submissions%20for%20Deadline%209.pdf>

Part 1: History of proposals and policies for the A628 corridor

The A57/A628/A616T between the M1 in South Yorkshire and the M67 in Greater Manchester is the only trunk route crossing the Southern Pennines. For more than 50 years the DfT and NH and their predecessor bodies have been attempting to address the issues on the route by increasing road capacity¹. To date road schemes have met with difficulties due to (i) the overarching transport policy agenda; (ii) piecemeal “out of context” development; and (iii) failure to plan strategically for both road and public transport (particularly rail) in the corridor. These are demonstrated by the 2007 collapse of the Mottram-Hollingworth-Tintwistle bypass public inquiry.

(i) The overarching agenda through those 50 years, has been to create a high standard all-purpose trans-Pennine route linking South Yorkshire and Greater Manchester. This was considered a vital component for successful urban regeneration on both sides of the Pennines². As transport policy changed, and it became understood that in many areas it was not possible to build a way out of congestion, the proposal for a motorway connecting the two was dismissed in the 1970s. There were also huge environmental issues in relation to damaging the National Park. Nevertheless, the M67 was constructed as a separate bypass of Denton and Hyde. The Stocksbridge bypass opened in 1988 and increased the strategic importance of the route and traffic flows on it. The current scheme with plans for the Hollingworth-Tintwistle bypass and dualling further east³ all reflect a continuing piecemeal approach.

(ii) Such piecemeal development, was rejected by the Government’s independent Advisory Committee on Trunk Road Assessment (SACTRA) in the 1980s⁴, because it avoids addressing the strategic impacts of the existing route and proposed upgrades. The A628T corridor even now threatens the integrity of the habitats and the special qualities of the Peak District National Park (PDNP). Plans for the Strategic Road Network (SRN) are required to avoid areas designated as National Parks, and go round them. The Peak District National Park Authority (PDNPA) has strong local plan policies that reflect this protection and seek reduction in traffic both within and through the area. Outside the Park, Greater Manchester and South Yorkshire both have targets based on Tyndall carbon budgets to reach net zero carbon by 2038 and 2040, respectively. In order to achieve these budgets Transport for Greater Manchester’s (TfGM) Transport Strategy and Right Mix ‘50:50’ policy aims for 50% of journeys by active travel and public transport by 2040, with a 17% reduction in car trips overall - a decrease in car trips of 6% for local neighbourhood journeys, 12% for the wider city region, 21% for trips connected to the regional centre and 7% for city-to-city journeys. These policies are not reflected in the A57 Link Roads’ development.

Piecemeal upgrades also avoid planning strategically for trans-Pennine travel between the Scottish border and the A52. Twelve miles to the north of the A628T corridor the M62 is designated part of the EU Trans-European Network (TEN) or Trans-Pennine Corridor with the M56, M180, and the north-south Trans-Pennine rail routes. There has been no attempt to reduce traffic impacts on the sensitive Pennine uplands by focusing trans-Pennine movements on the M62 corridor using a braided approach to road, rail and water. Instead, upgrades of the M62, the A66T and the A628T are all being developed at present.

(iii) The failure to plan strategically, and with respect for key environmental assets and environmental and societal impacts, has led to difficulties in progressing upgrades for the corridor. The 1970s motorway was rejected because of its impacts on the National Park. The failure of the 2007

¹ The Case for the Scheme - Summary

² Mottram Hollingworth and Tintwistle The need for a bypass, 1988, Tameside MBC, Derbyshire CC and High Peak BC

³ South Pennines Strategic Development Corridor, 2020, RIS2

⁴ See SACTRA Report on Urban Road Appraisal, 1986, also Environmental Impact 1992, Traffic Generation 1994.

Mottram-Hollingworth-Tintwistle bypass to proceed was due not only to the weight of objections but also to errors in the traffic modelling and its inability to reflect the new realities of transport policy. The inquiry was postponed to allow corrections to be made to the modelling but the public inquiry never re-convened. It finally closed nearly two years later, without another meeting, in March 2009.

In that context, developing and evaluating an option that fulfils the policy framework is essential. CPRE has been developing and promoting alternatives to major road building in this corridor since 2004. Its 2004 'Way to Go'⁵ proposals were well received but only a minority of them have been progressed. MTRU's⁶ 2005 appraisal of CPRE's proposed Peak District-wide lorry control system⁷ demonstrated its environmental benefits; in surveys it was the top solution chosen by local people⁸.

After the 2009 closure of the Mottram-Hollingworth-Tintwistle bypass inquiry, Tameside Council consulted on the Longdendale Integrated Transport Strategy⁹ (LITS) which included measures to improve conditions for walking, cycling and public transport use, as well as major road building. However it failed to receive central funding.

In 2014 MTRU developed for CPRE a package of travel demand management measures and Smarter Choices for consideration through the Trans-Pennine Routes Feasibility Study 2015¹⁰. These demonstrated strong benefits compared to road building and unambiguous evidence that they should undergo detailed appraisal. The rejection of these measures by HA is discussed further below in Part 2.

In 2020 CPRE undertook a broad on-line survey to collect views from both residents and visitors on the future of Longdendale and travel within it. This provided a long list of transport interventions that people wished to see. This was further developed through one-to-one interviews with residents and visitors to understand their specific travel experiences, and followed by an online professionally facilitated Green Travel Challenge to discuss the emerging measures. All this work has informed the final proposed package for Low Carbon Travel.

⁵ South Pennines Integrated Transport Strategy 'The Way to Go' - CPRE Peak District and South Yorkshire Branch, 2004. Measures included Lorry weight restrictions; revitalised main roads; 20mph zones; safe routes to school and travel planning; good quality cycle infrastructure and cycle training for all children; improved access to rail; bus lane on A628; Peak District- wide Quality Bus Contract with promotion and marketing; traffic calming and 30 mph through villages; Hope Valley line passing loop; regional rail card; road pricing in Greater Manchester.

⁷ CPRE lorry control proposal on the A628 – Assessment by MTRU, 2005

⁸ Travel Survey, Alternative Proposals for Transport & Save Swallows Wood, 2006; Longdendale Integrated Transport Strategy, Public Consultation Report, Tameside MBC 2010 – the most supported measure to address congestion was an environmental weight restriction (89%) with the bypass coming second (81%)

<https://www.tameside.gov.uk/TrafficManagement/Longdendale-Integrated-Transport-Strategy>

⁹ <https://www.tameside.gov.uk/lits>

¹⁰ Final Report for the 2014 Trans-Pennine Routes Feasibility Study, incorporating the Interim Note of 31-7-2014 - Keith Buchan, Director of MTRU, 2014. Measures included HGV weight restriction; opportunities for local journeys using travel planning, new walking & cycling routes, car sharing, car clubs, raising travel awareness and providing information on rail and bus; enhancements to rail services; reallocation of road space to cyclists.

Part 2: Developing an alternative package - Low Carbon Travel for Longdendale and Glossopdale

2.1 Developing and testing Options

The development and testing of options is central to any scheme preparation and appraisal. This is embedded in both the earlier and the latest versions of the Treasury Green Book¹¹ and WebTAG¹². The normal approach is to identify objectives which the options seek to achieve, and problems which are to be solved. The two are obviously related.

We have used this approach to generate elements of an alternative package, linking them to problem solving and achieving objectives. It is not claimed that any proposal is perfect, but there are some which perform much better than others.

Did NH undertake an option assessment?

In the case of this DCO, NH claimed that the option assessment stage was delivered by the February 2015 report¹³ referred to in the HA/NH Environmental Statement¹⁴. NH confirmed that this document was the basis for their initial option assessment.

It is clear from the source documents that, even in 2015, the appraisal table lacked some key strategic environmental and social objectives, in particular reducing greenhouse gases and promoting Active Travel (Climate Change and Health)¹⁵.

While it could be argued that, even in 2015, these objectives were clearly identified in local and national Government policies, policy development since then has been in a clear direction – raising the importance of reducing carbon (and other pollutants) and promoting sustainable travel. Supporting the economy remains a key goal but has to work within policies for levelling up and greener growth.

It is also clear that the rejection of the original HGV control scheme and sustainable travel measures was on the basis of the former being difficult to deliver and the latter not having enough impact. Apart from that the HGV control scheme scored reasonably well even on the limited objectives used (see Annex 2).

¹¹ An update was available in Dec 2020 during the A57 Link Roads statutory consultation - <https://www.gov.uk/government/collections/the-green-book-and-accompanying-guidance-and-documents>

¹² <https://www.gov.uk/guidance/transport-analysis-guidance-tag>

¹³ Trans-Pennine Routes Feasibility Study Stage 1 Report February 2015
<https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports>

¹⁴ APP-060 A57 Link Roads TR010034 6.3 Environmental Statement Chapters 1-4 June 2021 <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-000155-6.3%20Environmental%20Statement%20Introductory%20Chapter%201-4%20Introductory%20Chapters.pdf>

¹⁵ The objectives did not include carbon emissions reduction, reducing congestion impacts on the wider urban area beyond the trunk route, or encouraging modal shift to more sustainable modes. They included:

Connectivity – improving the connectivity between Manchester and Sheffield

Environmental – avoiding unacceptable impacts on the natural environment and landscape in the Peak District National Park, and optimising environmental opportunities;

Societal – improving air quality, reducing noise impacts, and addressing levels of severance on the trans-Pennine routes in urban areas;

Capacity – reducing delays and queues and improving the performance of junctions on the routes

Resilience – improving resilience through reductions in the number of incidents and reduction of their impacts;

Safety – reductions in the number and impacts of accidents

It is also important to make the distinction between “feasible” and “deliverable”. HA agreed that the alternative package was feasible, i.e. deliverable in practical terms, but had some risks associated with it, for example objections to any TRO required and enforcement costs. The former is normal for any TRO, including those required as part of and subsequent to, this DCO. For the latter the HA judgement has clearly been overtaken by technologies such as ANPR¹⁶ which is now very widely used and an established tool in the transport planner’s toolbox. HA’s 2015 sifting of options is therefore doubly out of date.

In terms of core objectives used for assessment, the importance of reducing carbon emissions and a move to sustainable transport has grown, especially with the passing into law of carbon reduction targets which depend crucially on mode transfers. This is reflected in the most recent national and local policies, for example the DfT Transport Decarbonisation Plan¹⁷ (TDP) with walking and cycling 50% targets for 2030, and the TfGM “50-50” policy¹⁸ which has locally specific targets for sustainable travel from now to 2040.

This is a transformation in policy objectives and legal targets since 2015. While the objectives used for the initial option appraisal were in our view incorrectly drawn at the time, they are now completely out of date. We have no hesitation therefore in revisiting the question of whether this road scheme is the best option to achieve strategic or local objectives.

2.2 Solving problems

In terms of the problems and objectives for this scheme, we would amend the HA/NH list as follows. The key existing problems we consider should be addressed are:

- 1) High carbon emissions from existing traffic
- 2) Noise, air pollution and severance caused by existing traffic in local streets
- 3) Noise, air pollution, severance and landscape detriment from much of the same traffic in the Peak District National Park (PDNP)
- 4) Unreliable journey times
- 5) Poor local conditions for walking and cycling (with associated health disbenefits)
- 6) Delays to local buses
- 7) Long journey times on strategic transport links between Manchester and Sheffield

In relation to these the A57 Link Roads scheme has a strong negative score in relation to carbon - it adds nothing other than the external impact of transfer to electric vehicles and will discourage established local and national plans to transfer traffic to sustainable modes. This is not necessarily the case with all road schemes – the A57 happens to be located within the outer area of a major conurbation, next to an important national asset (PDNP) which produces its own locally generated traffic, especially visitors.

The road proposal has a mixed picture on local impacts (2 above) with increases and decreases, and has a negative impact on the National Park (3 above). Journey times were only given for sections of road rather than a representative number of actual journeys. In relation to 5) walking and cycling routes are fitted on to the new road using “walk with traffic” schemes which hold users in the middle of the carriageway so as not to interfere with the traffic stream and offer no direct

¹⁶ ANPR: Automatic Number Plate Recognition, used widely for traffic and speed limit enforcement on the strategic and local networks including congestion charging and air quality zones.

¹⁷ Decarbonising Transport, A Better, Greener Britain, DfT 2021
<https://www.gov.uk/government/publications/transport-decarbonisation-plan>

¹⁸ Greater Manchester Transport Strategy 2040 – ‘Right Mix’ Technical Note, TfGM January 2021
<https://democracy.greatermanchester-ca.gov.uk/documents/s12589/GMTS%202040%20-%20Appendix%201%20Right%20Mix%20Technical%20Note.pdf>

crossing¹⁹. If used at all, they will encourage risky behaviour from trying to beat the traffic cycle which could otherwise cause crossing times up to 2 minutes. No information is available on predicted walking and cycling use of these routes or route timings. Several footpaths are severed by the new road and an associated large scale junction.

Strategic route timings are predicted to get longer in future years compared to the present day, but are claimed to be less worse with the scheme. However this conclusion is subject to the criticism of the modelling in another section of this report (Part 3). Basically the impact of the traffic changes on the road network in Manchester are screened out by the use of a buffer network and “masking”. This is referred to by NH as removing “model noise”. A more technically detailed explanation of this screening is given in REP10-013²⁰.

It is important to emphasise that a scheme which makes road traffic faster will make such travel more attractive. The variable demand model is supposed to represent this, although it does not do so for freight. Neither does it identify exactly how this will change the balance of competition between sustainable modes and motorised vehicles across the area. This is important because it is traffic in these areas which is subject to the key Government policies to reduce carbon, for example as set out in the DfT Transport Decarbonisation Plan (TDP) and the TfGM “50-50” policy referred to previously. In this specific case the majority of the benefits appear to be to traffic in the local area - trips entirely within Greater Manchester represent 55% of total benefits.

Some of the elements of this package involve the concept of “coherence” in terms of creating an area where public realm and traffic control work together, and a series of consistent signs, planters, seating and crossings gain from a consistent and clearly signposted approach. This in turn moderates driver behaviour and improves safety. The importance of this approach is found, for example in the DfT guidance on walking and cycling networks²¹.

2.3 Overall approach: building a package

Before setting out some more detailed proposals to the high level problems listed above a summary of the approach is set out below.

- 1) Reduce pressure on the system overall through traffic reduction and dispersal
- 2) Reduce the number of the most environmentally damaging vehicles on the local road network
- 3) Improve safety on the whole A628 PDNP route by reducing speed limits
 - 50 mph through the Park
 - 20 mph from Tintwistle to Hyde Road
- 4) Encourage more walking for local journeys and increase footfall in all the settlements at the Western end of the A628 by:
 - more frequent protected crossings

¹⁹ There are exceptions at the major M67 roundabout: All pedestrian phases are ‘walk with traffic’ apart from 3 linked to the traffic timings and requiring demand actuation (push button) at:

eastbound exit onto Hyde Rd; southbound exit onto Stockport Rd; westbound exit onto Mottram Rd

²⁰ REP10-013 comments on submissions for D9 Fixed cost function and masking pp1-3

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001475-CPRE%20PDSY%20-%20comments%20on%20submissions%20for%20Deadline%209.pdf>

²¹ Local Walking and Cycling Infrastructure Plans, Guidance for Local Authorities, DfT April 2017

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908535/cycling-walking-infrastructure-technical-guidance-document.pdf

- reduced speeds
- public realm improvements and “signals” to motorised users
- 5) Use junction reconfiguration, signalisation and revised signalisation to
 - control remaining traffic
 - introduce greater priority for buses, pedestrians and cyclists
- 6) Undertake a travel planning programme locally which would:
 - inform people about existing alternatives to car use
 - identify barriers to using alternatives
 - identify improved provision on the basis of the travel planning programme
 - implement improvements, monitor and modify
- 7) Improve sustainable North/South links as well as East/West

2.4 Summary Package: Low Carbon Travel for Longdendale and Glossopdale

Our alternative package would comprise a number of new combined pedestrian signals/bus stops and gates on the A628 route through the Longdendale settlements, linked to existing paths and developments

- 1) Public realm improvements to create a coherent network and encourage footfall
- 2) Enlarged junction at Woolley Bridge to include a priority entry lane for buses and cyclists from the A57.
- 3) A comprehensive travel plan for Longdendale, beginning with a travel planning programme including both workplaces and residential areas (these need different techniques)
- 4) Use the travel planning programme to:
 - define place to place local cycle and walking routes (not necessarily the same)
 - set up new or improved bus services with initial incentives to try them
 - better integrate rail and bus services locally
 - improve links to TfGM networks for public transport and cycling
 - pilot bike and e-bike deliveries from local shops
 - create financial incentives to overcome barriers and provide longer term support (particularly useful for workplace plans encouraging public transport and cycling)
- 6) Institute an HGV control scheme for the National Park to remove through HGVs. This would need an area based approach and have two options: restricting only the heaviest (over 24 tonnes) or all HGVs (over 7.5 tonnes) except for access.
- 7) Link new and existing traffic signals to a centralised area wide controller and the TfGM system.

2.5 Pedestrians and buses: improving access and controlling traffic

The need to improve public transport, walking and cycling in the area is well established, for example in the Tameside LITS study of 2010. This underwent extensive consultation and the results helped to inform this package. Some helpful work on what the bus improvements might

look like can be found in the summary and consultation documents²². A more detailed package would require the supply of local data which was not available from NH.

One of the points of the proposed travel planning programme is to reveal demand for facilities and refine services and infrastructure improvements rather than imposing solutions. This means they are more likely to be used (there are many workplace travel plan examples). However, some useful suggestions were gathered in the public consultation exercises, both for the original LITS in 2009 and through the CPRE Green Travel Challenge²³ consultation in October 2021.

The findings from the latter have assisted in preparing this package and the Green Travel Challenge report, which was submitted to the Examination, should be considered alongside it. In terms of possible elements of the package all authorities were invited to the consultation and we have had a useful follow up meeting with the PDNPA. The alternatives need to be co-ordinated with PDNPA's sustainable travel initiatives. These in turn are another relevant policy since they influence traffic flowing into the study area (and are part of the NH Area of Detailed Modelling).

The approach to pedestrian crossings is to provide more of them, both to encourage walking and also to create easy access to buses. A full review would be needed but initial work on the ground (including analysis of existing demand points and bus stops) and the responses from the consultation have been used to show how this would work. It takes full account of the need for coherence, and the other recommendations in DfT guidance. This states that walking (and cycling) should have "five core design outcomes":

- attractiveness
- comfort
- directness
- safety
- coherence

The package addresses all of these issues directly, whereas the proposed A57 Link Roads scheme essentially relocates them. The list of improvements in the guide is in Annex 1.

Overall on the 3 mile section of road between Tintwistle and Hyde Road there are currently 7 sets of signals of which 4 are pedestrian crossings. Four new sites have been identified as shown on the attached map. The photo below of an existing crossing in Hollingworth on the A628 shows the opportunities for also improving the existing facilities, for example through replacing guard rails and using coloured road surfacing and planters. The intention here is not just to create the improved crossings, but by having a series of them, properly integrated with public realm improvements, a sense is created in drivers that this is not an area where traffic alone dominates – there is a balance. Figure 2.2 below shows a first draft of sites for crossings²⁴. All of these are associated with footpaths, local residential settlements and bus stops. Some of the routes to the latter via the crossings will also need items such as improved lighting.

²² See <https://www.tameside.gov.uk/lits/summary>

²³ REP2-071 <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010034/TR010034-000842-CPRE%20PDSY%20-%20Other-%20separate%20report%20accompanying%20written%20rep.pdf> and

[REDACTED] This was conducted by independent specialist consultants and the Consultation Report published in November 2021

²⁴ Please note: a crossing on the A57 for the Trans-Pennine Trail and a bus gate in Old Glossop are not shown



Figure 2.1 Existing pedestrian crossing on Market Street, Hollingworth which could be improved.



Figure 2.2

New signalised crossing



Existing signals no pedestrian phase currently



Existing signals



Please note: a crossing on the A57 for the Trans-Pennine Trail and a bus gate in Old Glossop are not shown

New bus priority/signalisation



2.6 Bus service improvements: an integrated approach

While improving conditions for walking as well as access to bus stops is one part of the picture, the package proposes improvements to:

- the stops and waiting areas
- the buses themselves
- service frequency and reliability.

Proposals for stop and shelter improvements were made by Tameside in its LITS Strategy from 2010. In this package the idea would be to co-ordinate with and reinforce the public realm improvements and driver behaviour indicators. Consistent signing would be used to emphasise that it is a local community and recreational area, including the theme of Longdendale's special qualities and connection to the National Park (e.g. as a "Gateway"). Such behavioural approaches are increasingly common and understood, particularly where space is shared between traffic and local movement on foot. The modern understanding that walking is not just a mode of transport, just without wheels, but an opportunity for social interaction and creating demand for local facilities such as retail is the basis for some of the proposals in the Low Carbon Travel for Longdendale and Glossopdale.

In terms of external air quality and internal comfort, buses should be replaced as soon as possible by electric versions with air circulation/conditioning and WiFi. However, the package also includes improved services. Using the data from NH, and the feedback from the consultation, both on the original LITS and the Green Travel Challenge conducted in 2021 the following is an indicative package:

- the purchase and operation of three new electric buses to raise the profile of bus services and allow for increased services
- one option could be reviving part of the X57 Glossop to Manchester to provide an hourly service (2 new buses). The A57 south of Hollingsworth and Hadfield has significant employment areas and a settlement at Gamesley. The latter has an hourly hail and ride service (no evenings) but much of it is less than the recommended minimum for bus stop access. This would enable a guaranteed interchange between local buses and the X57, for example from the existing 20 minute service on the 237. The package would enable much faster links between Tintwistle and Manchester destinations The X57 used to run from Sheffield, but was poorly used. It is not clear why this was, given that the NH scheme is predicated on a lack of links between the two cities.
- a new local hopper type service serving Tintwistle, Hadfield and Glossop (including South of the centre). This would be co-ordinated with the X57 so that some of the frequent stops for this service in Glossop could be avoided. This could be used to reduce the X57 journey time as an express service.
- A new junction layout at Woolley Bridge to widen access inbound from the A57 allowing for a bus and cycle approach lane and a priority entry. The junction should also be signalised. A picture of the junction approach which would be widened and be signalised to include a bus/cycle priority is shown as Figure 2.3 below. The existing bus stop would be in the proposed new priority lane.
- Bus gates at selected pedestrian crossings would have the dual function of breaking up and distributing any queuing traffic and improving bus journey times. These would be directional, with the ones at the eastern end having westbound priority

and vice versa. The use of gates instead of full length bus lanes is one which was pioneered in London but is now widely used and has three main advantages:

- Less disruption to general traffic of all types
- Lower space requirements and better compliance
- Easier to integrate with other functions, in particular pedestrian and cycling crossings

Figure 2.3 Woolley Bridge junction showing single file approach and current bus stop



*Note: Woolley Bridge is to the left out of view.
Photo data: MTRU, August 26th 2021 15:47.*

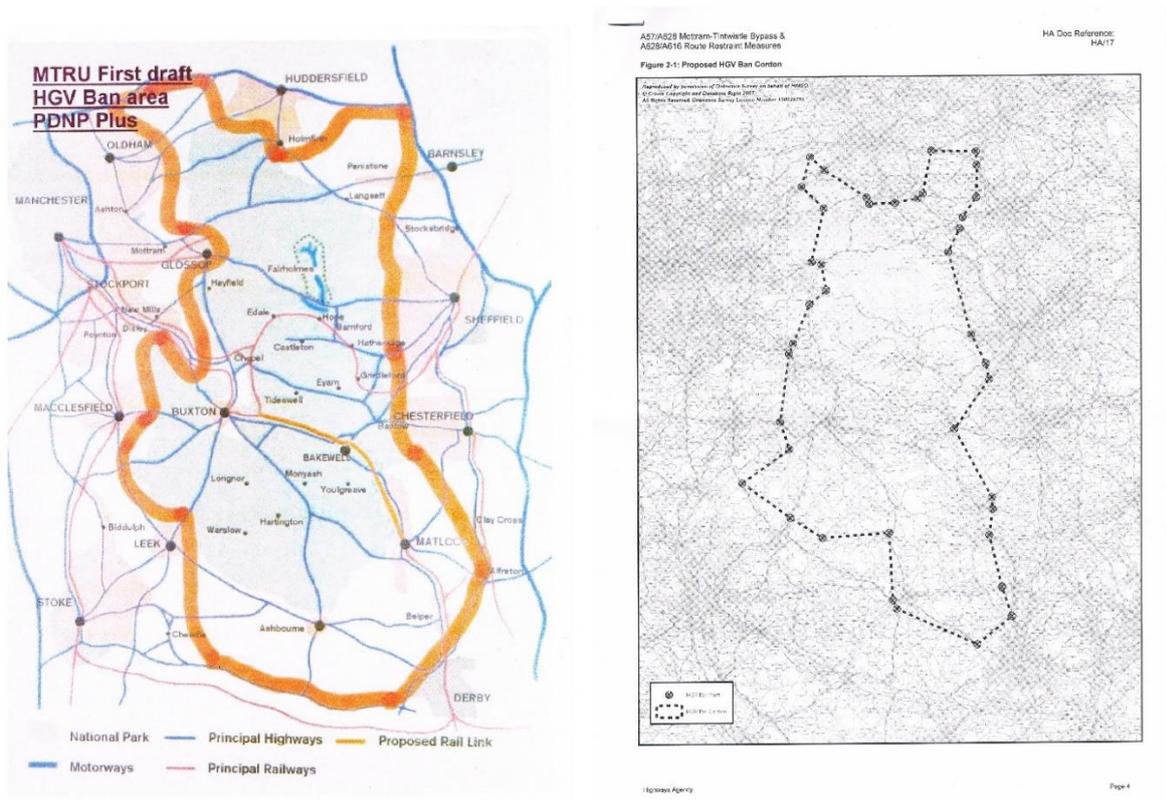
2.7 HGV control scheme

Introduction

An HGV control scheme on vehicles over 7.5 tonnes was first proposed by MTRU and included in the HA Strategic Assessment in 2015. An indicative map was produced, then translated into a detailed map suitable for the transport model. This included site visits to the proposed sign locations for costing purposes.

These two maps are shown in Figure 2.4 below.

Figure 2.4: HGV control scheme initial area proposal (indicative map left; detailed map right)



Access restrictions such as this are widespread and a local example from Old Glossop is shown below.

Figure 2.5: Example of local access restriction



Photo data: MTRU, August 27th 2021, 09:39

One of the key issues in 2015 was enforcement and since then there has been considerable progress in methodology, in particular use of cameras and number plate recognition. A recent example of an HGV scheme is the London Low Emission Zone (LEZ) which covers the whole of the Metropolitan area. This applies to all HGVs over 3.5 tonnes and is more stringent than many HGV restrictions which operate at 7.5 tonnes. Examples of the latter can be found locally, for example in Old Glossop (see Figure 2.5). The original CPRE proposal was for an HGV access only restriction but in developing such an option, and as part of any further consultation, other options should be considered. Additional work has indicated that an even simpler control would achieve most of the benefits.

A good example would be a restriction on the heaviest and most damaging vehicles only: for example those with four or more axles. These are basically over 32 tonnes and include most articulated HGVs. Analysis of the traffic flows at Chapel Brow and Woodhead from the DfT dataset shows how these are the dominant HGV type. Because the manual counts were not conducted in the same year, an extra check was done for Woodhead.

Table 2.1: HGVs and traffic A628

	All traffic	HGVs (%)	Large HGVs (%)
Chapel Brow 2019 Manual count	11676	1423 (12%)	1051 (9%)
Woodhead 2016 Manual count	12592	1537 (12%)	1137 (9%)
Woodhead 2019 Estimated	12957	1621 (12%)	1181 (9%)

Source: DfT at roadtraffic.dft.gov.uk

External costs and HGVs

One issue in assessing the alternatives is the extra costs of diverting HGVs from the PDNP. It is important to understand that HGVs, especially the largest HGVs, have a scale of environmental, infrastructure and congestion impact which is hugely greater than cars. The most extreme example is road surface damage, and thus road maintenance, which is about 180,000 times greater for the heaviest articulated HGV than a car²⁵. Noise, vibration, visual intrusion, emissions and particulates are all greater, if not to the same extent. All of these effects (known to transport economists as external costs) are well known and documented.

Purpose built roads, such as motorways, are designed to minimise these external costs. The DfT data on external costs, in the TAG Data Book, sets out values for such impacts, to be used for broad brush assessment. Although the diversion of through traffic of HGVs from the PDNP is likely to cause an increase in distance, this will be at a lower rate of external cost. In this case there would likely be an overall reduction in external costs.

This is not the whole picture. Demand for using HGVs is directly related to the cost. Such an effect is included by NH in their modelling for cars, but not for HGVs. Use of the latter is in fact much more sensitive to cost than car use – this is because there are a variety of options to reduce HGV travel including use of other modes, time switching, use of alternative depots

²⁵ This is because damage rises rapidly with axle weight, usually calculated using the 4th power law

and modifying logistics systems to minimise external impacts. In addition, HGVs are significantly underutilised - they are in fact completely empty²⁶ for 28% of their travel.

There is sometimes some confusion between the amount of goods by weight which are delivered (usually referred to as “tonnes lifted”) and the distances travelled by road in order to deliver them. The total weight of goods delivered, for example goods from ports to depots, is much less sensitive to price than HGV travel. This is because the options for the way the goods are transported are many and diverse (see above), including the obvious one of their current lack of efficient use of vehicle capacity.

DfT recommends using the TAG Data Book for broad brush assessment of external costs and these data are the same as those used for detailed appraisal, for example carbon values. Using this it is possible to calculate the external cost impact of the control scheme at the strategic level. The key factor is that external costs will be lower on motorways than A roads. This is fairly self-evident but specific data is available and this is illustrated in the table below which shows the significantly lower accident rates per mile for HGVs on motorways compared to non-built up A roads. In terms of HGV distance travelled, there are twice the number of road casualties, 3.3 times the number of killed and seriously injured and 4.4 times the number of fatal casualties, on non-built up A roads compared to motorways.

Table 2.2

Ratio of casualties on non-built up A Roads compared to Motorways		
Killed	Killed and seriously injured	All severities
4.4	3.3	2.1

Source: DfT tables RAS 30017 and TRA 0104

Initial assessments were that the maximum increase in journey length would be 32 miles replacing the A628 with the M1/M62. This will not apply to all trips but provides an upper bound. Using similarly congested networks, replacing travel on A roads with motorway travel results in a substantial external cost net benefit. While this point was made at the Examination, a full comparison with additional operating costs was held back pending further data from NH on the trip length and route of HGVs on the A628 – a “select link analysis” – at Woodhead. This was received and confirmed the original estimate for through traffic, but the other data requested was not available. In this case, and subsequent to the Examination, we have prepared an assessment based on what data is available and this is covered in Part 2.10 below.

In terms of traffic relief, and therefore congestion, HGVs clearly take up significantly more road space than cars. Most traffic assessments and modelling uses the passenger car unit (pcu) as its basis for comparison. The average for all HGVs is usually taken as 2.4 pcu or above (depending on specifics such as junction delays). However, this average conceals differences between smaller HGVs and heavy articulated vehicles which are rated at 2.9 pcu and above.

In this case, where there are high proportions of the heaviest HGVs, analysis shows that a majority of the congestion benefits from the control scheme would come from removing the

²⁶ DfT freight statistics Table FRS 0125 <https://www.gov.uk/government/statistical-data-sets/tsgb04-freight>

heaviest vehicles. This allows for a proportion which would require local access estimated from the flow differences at the count sites (10%).

Based on the opening year flows supplied by NH²⁷ a restriction on HGVs, using a 2.4 pcu value, would result in a traffic reduction of at least 17.3%. Removing only the heaviest (about 75% of the total) but applying the higher pcu value results in a traffic reduction of at least 15.4%. The remaining car traffic is subject to the sustainable travel package and the two results combined to provide an overall reduction. Again a more detailed analysis using standard cost benefit methods, and the available data, is provided in Part 2.10.

The initial figures have been public since October 2021 and were used in the CPRE Green Travel Challenge consultation. The slides from that, which summarise the first draft of the package and the impacts, are part of the Green Travel Challenge report²⁸ which should be read in conjunction with this more detailed analysis. The individual elements have been developed since the consultation and the overall reduction figures have increased marginally by around 1%.

2.8 Potential overall impact of Low Carbon Travel for Longdendale and Glossopdale

An initial assessment of local traffic which might be affected by the sustainable travel package was made from the flow data between the cross Pennine routes and the local flows at Mottram. More detailed car trip matrices were supplied by NH towards the end of the Examination. Local data was extracted from them to improve the local traffic assumptions used for the calculations. It is difficult to apply data to 2025 because the DfT TDP uses 2030 and TfGM use 2040 as target dates. Using TfGM assumptions, 2040 local traffic levels could reduce by about 17% but the impact of sustainable policies on the rest of the traffic is an unknown. Even assuming there is no impact from such policies (itself a limiting case) traffic reduction overall would be about half that, i.e. 8-9%. A more detailed analysis was difficult due to the lack of data from NH. However, national data and as much local data as possible were used to refine the impact assessment of the alternatives for this report.

Using the anticipated TfGM Right Mix policy impact on traffic reductions as a proxy for the impact of Low Carbon Travel sustainable transport and combining this with the HGV control scheme would lead to the traffic reductions on the A57 at Mottram Moor shown in Table 2.3. Figures are given for Low Carbon Travel with all HGVs subject to a weight restriction ie 7.5tonnes and over, and with only the heaviest HGVs (articulated) subject to a weight restriction. The differences between them are marginal as the heaviest HGVs predominate but this needs to be confirmed with better HGV data.

Table 2.3

	Gradual TfGM 2025	Gradual TfGM 2040	DfT TDP 2030	Updated DfT TDP 2030
Package + all HGV control	-21.3%	-24.1%	-28.2%	-28.6%
Package + heaviest HGV	-19.5%	-22.3%	-26.4%	-27.7%

²⁷ APP-151 Appendix 2.1 of NH Document 6.5, the Environmental Statement, Traffic Data <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-000234-6.5%20Environmental%20Statement%20Appendix%202.1%20Traffic%20data.pdf>

²⁸

2.9 Costs of Low Carbon Travel for Longdendale and Glossopdale

In seeking to move this package forwards some indicative capital costs have been allocated. The least certain aspects are the two major junctions: the M67 and Woolley Bridge. The latter is moderately sized while the M67 needs further detailed design work and is not included in the estimate below. The package has been costed at £9.7million at today's prices including optimism bias at 44%²⁹. This is important because construction costs have some uncertainty at the moment.

Table 2.4: Low Carbon Travel for Longdendale and Glossopdale cost estimates

• Woolley Lane junction signalisation and provision of bus/cycle priority entry	£1,000,000*
• Three new signalised pedestrian crossings	£450,000*
• One new pedestrian crossing with bus gate	£250,000*
• One bus gate at existing crossing	£150,000
• Two additional pedestrian phases at existing signals	£150,000*
• Three new electric buses	£1,000,000
• Travel planning programme initial survey and planning	£500,000*
• Travel plan start up incentives 3 years @ £350k pa	£1,050,000*
• Walking route improvements (50 kms @ £5k per km)	£250,000*
• Cycling improvements (includes 50 kms plus parking and other incentives)	£500,000*
• 20 mph speed limit plus public realm (20 kms @ £10k/km)	£200,000*
• HGV signs including advance warning on motorways ³⁰	£1,200,000
• Total	£6,700,000
• Plus Optimism Bias 44%	£9,650,000

The items included in the walk and cycle part of the package are indicated with a *. Travel planning has been split 50-50 between walk/cycle and public transport, as has the cost of the Woolley Bridge signals including bus/cycle priority. This enables the walk and cycle elements to be subject to a cost benefit assessment on the same basis as the proposed A57 road scheme using the DfT's Active Mode Appraisal Tool (AMAT). Details are given in Part 2.10 below on package assessment. The other elements (HGV control scheme and public transport) are also subject to assessment using established DfT cost benefit parameters in Part 2.10.

As noted above, in regard to the cost table it is important to note that no additional costs are given for signalisation of the M67 roundabout. This could be modest if undertaken within the existing layout, but would become more expensive if more construction work was needed, of the order of £5million. NH said they would not supply details of the roundabout

²⁹ See TAG Unit A 1.2 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1102786/tag-unit-a1-2-scheme-costs.pdf Optimism bias is the demonstrated systematic tendency for appraisers to be overly optimistic about key parameters. Optimism bias of 44% is the recommended highest level adjustment for standard civil engineering projects - see Supplementary Green Book Guidance Table 1 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/191507/Optimism_bias.pdf

³⁰ In practise we would propose an engagement with freight users and operators to minimise costs and maximise benefits – analogous to travel planning for personal travel. The costs and benefits are not included here due to lack of data on HGV use. The benefits should however easily outweigh the costs.

costs separate from the rest of the scheme. In any case the layout with the sustainable package would not need as much major change as with the road scheme. It also seems very likely that the roundabout will have to be signalised as part of new development conditions so may not need funding as part of this package. While no costs have been calculated for the M67 works, there are also no benefits included in the assessment.

2.10 Low Carbon Travel for Longdendale and Glossopdale Cost Benefit Assessment

Achieving objectives

As we set out in Part 2.1, any transport scheme should have a full option development process, when overall objectives are assessed. These strategic quality of life objectives should continue to guide scheme development and appraisal throughout. Our analysis shows that this scheme would in fact undermine key objectives such as improving safety and reducing carbon emissions. The latter is considered in detail in Part 5 of this report. If full account had been taken of the key objectives, this scheme should never have passed its Strategic Case assessment (as mandated by the Treasury Green Book). The Green Book Review set out the issue in some detail and suggested remedial actions. Despite this, considerable weight is given to the next stage of appraisal, the detailed Economic Case, and in particular the production of a value for money figure as part of it – the benefit to cost ratio or BCR. Useful and more detailed data is usually collected for the Economic Case, and measuring costs and benefits for alternative proposals can be undertaken in a similar manner to that for the road scheme.

The traditional cost benefit approach and BCR

The proposed A57 Link Roads scheme has undergone a cost benefit analysis which claims to conform to DfT guidance. Part 3 of this report considers how in our view this claim is not justified, for example in the lack of traffic reduction in the urban areas adjacent to the proposed scheme, the lack of option assessment and the failure to deal with new policy and uncertainty.

As part of this traditional cost benefit approach a monetised BCR was produced for the A57 Link Roads scheme. The limits of monetisation are well known and not detailed here. The limits of the BCR are also well known and described in DfT guidance. However, to show the value for money of the proposed alternative we have undertaken a cost benefit analysis using the available data and this section presents its results. Throughout we have used the same DfT guidance and monetisation values, in particular in the DfT TAG Data Book. The aim has been to produce an assessment which can reasonably be compared to that for the A57 Link Roads. We have also drawn attention to the areas of uncertainty, as professional practice and DfT guidance require. As will be seen, much of the uncertainty is the result of inadequate NH data so is also present in their assessment but unacknowledged. This is the first issue considered below.

Making the best of the data

During the DCO examination it became clear that there was a lack of walking and cycling data or of any estimates for future use. The same was true for public transport – despite claims that it was included in the NH modelling. In fact there was some limited rail data which at the time of writing seems to have been used in a different and undisclosed high level model. Although NH claimed their modelling included variable demand, this was for car only, and was severely limited by the lack of sustainable personal travel modes. It completely excluded heavy goods vehicles. It was also clear that no specific account was taken of the

policies in the DfT TDP which aspires to a move to sustainable travel modes and away from car traffic.

Despite this surprising lack of data, it has been possible to produce assessments for the following:

- walking and cycling elements of the alternative package using DfT standard software
- costs and benefits of public transport improvements, but excluding time benefits to existing passengers (because of the inadequate NH data and model)
- estimates of the costs and benefits to operators and the public of the HGV control element using figures from the DfT Data Book (which uses the same parameters as used for all DfT appraisal)

For personal travel, the local car traffic at Mottram was estimated from the sector data supplied by NH and mode transfer assumptions were applied from the details in the Climate Change Committee's (CCC) 6th Budget. This is what underpins the DfT TDP. Technical work pre-dating the DfT TDP by TfGM for their "50-50" strategy was also used to check the existing programmes to promote sustainable travel.

For goods vehicles, the amount of through traffic was obtained from NH but there was no categorisation between rigid and articulated HGVs, nor between smaller and larger HGVs. As set out earlier in the traffic impacts, local DfT count data on the A628 was used to assess the balance between articulated and rigid – about 75% were articulated, higher than national averages. Average HGV trip lengths and categories from DfT were used since specific data was again not available from NH. Fine tuning the control scheme to cover articulated HGVs only would reduce its negative impacts since there appear to be a small number of lighter HGVs with much lower disbenefits and a higher likelihood of needing local access. However the current lack of origin and destination (O&D) data by HGV type (or detailed O&D) makes this difficult. This should be remedied urgently bearing in mind its important role in the NH appraisal.

Further details of each approach are set out below, starting with walking and cycling.

Walking and Cycling

The figures from the CCC provided a high and low estimate for walking and cycling use. It should be noted there is some interplay between these modes and public transport, particularly bus and cycle. There was not enough data from NH to assess this. Again this is rather surprising.

Obviously the creation of new walking and cycling routes is entirely in line with TfGM, local authority and Government policy. The reality of this is evidenced by the development and growth of the TfGM Bee Active network³¹. The original 2018 TfGM vision for the Bee Network was a 10-year, £1.5 billion plan to create 1,800 miles of routes and 2,400 new crossings connecting every neighbourhood, school, high street and public transport hub in the city-region. The forecasts for Low Carbon Travel are based on the overall CCC averages and do not take account of any enhanced effects from the Bee Network.

These figures were used as inputs to the DfT Active Mode Appraisal Tool (AMAT). This is the standard method for appraising such schemes and is in widespread use. MTRU has used it for a number of assessments, including some for National Park Authorities. The detailed assumptions and results are in Annex 3 (taken from REP4-016) but one important one is that

³¹ See <https://beeactive.tfgm.com/bee-network-vision/>

the appraisal runs from 2023 up to the net zero end date of 2050 which is when the CCC forecasts also stop.

The results are as follows:

Table 2.5: Key outputs from AMAT

	Low CCC	Central	High CCC
Number of new users 2025	700	840	980
Rate of growth	5.5%	6.1%	6.7%
BCR	5.34	7.98	10.21

New users calculated from DfT TDP and TfGM 50-50 policies

In addition to the package costs in Table 2.4 there is one difference in that an additional ongoing sum of £100,000 per year up to 2050 has been added to the Low forecast, and £50,000 to the High and Central forecast. This is intended to provide sensitivity testing. A variation in the appraisal period, which would normally be done as a sensitivity test, is not required since the appraisal was run up to the specific end date for the net zero policy (2050).

In all cases the optimism bias was raised from the AMAT standard 15% to 44% as in our original submission³².

In other respects the inputs to the capital side used the list in Table 2.4 above, which were circulated for comment to NH and local authorities during the examination.

Public transport: buses

Undertaking the assessment of public transport was more complex, with very little data from NH and none on bus use. Local checks produced a more up to date picture of available routes and frequencies than the NH data. Because the position on rail was not finally clarified at the Examination, proposals have not been included for the package. There would obviously be costs and benefits from any rail enhancements in addition to bus but there was insufficient clarity on how rail had been treated in the NH modelling to add this to the package. In practise a holistic public transport package would be needed and should achieve even better value for money.

On the bus side there were several elements. First were the TfGM, DfT and CCC high level assessments, these were supplemented by analysis of local routes and potential origins and destinations. This led to an assessment of the scale of passenger use and the number of new buses and size required. The proposal is for 3 new electric buses which can carry about 40 passengers each.

It should be noted that the most effective way of increasing bus use is through engagement with users, in particular through travel planning. The exact nature of the routes offered should reflect the work done in the travel plan. The expenditure for this is split between the bus part of the package and the walking/cycling part. This makes the proposal somewhat

³² REP2-070 Alternatives first draft – see REP12-032 for corrected Table on page 15

REP2-070 <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010034/TR010034-000857-CPRE%20PDSY%20-%20Other-%20report%20to%20accompany%20CPRE%20written%20rep.pdf>

different from a traditional service by service approach looking at existing local demand. The end result should be services which are more closely aligned to what people will use. We have not used an enhanced forecast for this overall but do assume that a slightly higher proportion of new bus users will switch from car. The normal figure is 3 in 10, we have used 5 in 10, but have undertaken a test with the national figure as part of the assumptions for the Low forecast.

We have applied our predictions for increased public transport use to the proposed service levels with forecasts for peaks, interpeak and evening. This produces an average daily bus occupancy which can be checked against national figures. Our prediction is for a weighted average of 12, varying between 20 in the morning peak and 4 in the evening. This compares with the national figure of 10.7 for England outside London. While the low fares and travel planning should at least achieve 12, we have also done a test at 10.7 by using this reduction for the Low forecast.

There is some interplay between cycle and bus options but the level of data available precludes any detailed work on this. In the overall package assessment at the end of this section, this effect will be diminished but not completely eliminated.

One benefit is the removal of external costs from the road network as car drivers switch to public transport. This is used in all such appraisals and we have used the average for A roads from the DfT's TAG Data Book. This may well underestimate the impact since the Mottram stretch, although short, is so congested and polluted.

Because the exact routeing of the bus services has not been defined and there is insufficient data on existing services, the benefits from the bus priority and traffic reductions to existing bus passengers are not included in the bus benefits. This is an omission from the benefits which should be significant but is simply beyond the data available.

On operating costs we used two sources: one derived from DfT standard equations (Data Book Table 1.3.14), the other simply used an average per passenger from national data. The latter was higher and the former did not include charging costs so the national figure was used.

For fares we have used the TfGM standard figure of £2, discounted as with all other current costs to 2010 prices for the appraisal. In practice, this will be subsidised for the passengers as part of the incentives in the travel plan package.

There is a remaining benefit to be calculated: the social value of trips made on the new services which are not due to modal shift from car. The TAG Data book gives an average figure and we have used one for those with concessionary passes (the lowest). We have also used the DfT average bus trip generation proportion of 21.

The results of the appraisal and key elements are shown below:

Table 2.6: Key appraisal elements

	Low	Central	High
Number of passengers 2025	2101	2356	2612
Car transfer (car drivers)	630	1178	1306
External costs saved per day (Average A road)	£1058	£1978	£3079
Operating costs less fares per day (no capital)	-£37	£762	£844
Average car trip length miles	5	5	8.4
Value discounted over 10 years	£4.838million	£7.227million	£12.481million
Capital costs	£1.968million	£1.968million	£1.968million
BCR	2.46	3.67	6.34

*All Costs and benefits in £2010,
External costs are for 2025 from TAG data book*

We have tried to test the robustness of the appraisal for this element of the package by combining a number of pessimistic assumptions in the Low column. In addition the cost of the travel planning programme has a major impact on the BCR, and represents about a third of the £1.968million total.

Despite this, we do not consider this cost benefit assessment as definitive and as reliable as the one for walking and cycling. Without better local data there are a few costs and benefits missing, although we consider that on balance the impact would be to improve the BCR. In particular there will be significant benefits to existing bus travellers from new priority and from the reduction in and improved management of traffic, in particular making bus journeys faster and more reliable.

HGV control scheme costs and benefits

At our request NH were able to supply some additional data on HGV flows on the A628. However this revealed a lack of detail in two crucial aspects. First there was no distinction within the HGV category between the heaviest 44 tonne gross vehicle weight (gvw) and the lighter rigid, for example 7.5 tonnes gvw. Secondly there was no detailed O&D information other than at the broad sector level. This meant that journey information such as trip lengths or commodity were not available. However data was sufficient to confirm our original estimate from the count data that longer distance HGVs passing through the area were about 90% of total HGV flows. These vehicles were the subject of the MTRU proposed access only HGV control system which does not affect local goods vehicle traffic.

The first observation is that this lack of detail in the NH data is in itself surprising given that HGV flows on the A628 are such a major and obvious problem. There has clearly been a lack of analysis of this issue, even at this basic level. While the generation of extra car traffic

caused by the scheme has been addressed (albeit only in part as became apparent at the Examination) no such exercise was carried out for HGVs. This is often omitted where car flows are the dominant component of the problem being addressed and in the economic assessment. This is not the case for the proposed A57 Link Roads and a more thorough HGV assessment should have been undertaken.

A key reason for this is that HGV traffic is far more sensitive to changes in cost than car traffic. The amount of goods transported is not very sensitive, but the distances travelled and the mode used is very much so. This is because there are many behavioural options open for HGV transport in relation to cost increases:

- more efficient use of vehicles
- changing choice of depot to reduce vehicle kilometres
- changing mode – rail is particularly competitive for unitised goods such as containers on the largest HGVs.

Similar changes happen in reverse – for example logistics systems will prioritise efficiency to a greater or lesser degree according to transport cost.

Sensitivity is usually measured as an elasticity value. A value of one means that all the cost change is absorbed by behavioural change. In the case of HGVs, this varies by commodity and trip length but overall an elasticity value of 0.9 is widely accepted, including by DfT³³.

Given the limited data we have not calculated how much extra HGV traffic would be generated as a result of the scheme. This should have been done by NH as part of their variable demand work which they submitted to the Examination and is, in our view, a major omission.

For the MTRU control scheme we consider it helpful to give an estimate of the cost changes in the same way that the economics table for the A57 Link Roads has been approached, including an allowance for changes in HGV behaviour. This is possible because the additional distance involved in transferring HGV traffic to the motorway network away from the A628 can be measured. This will be a maximum but given the lack of O&D data for HGVs in the National Park this would provide a fair working basis for a calculation.

There are three steps to calculating the change in cost. The first is the external costs such as carbon emissions, pollution, accidents and congestion. These are significantly lower on motorways than A roads but vary according to level of congestion. The DfT Data Book (used for appraisals) has 5 different levels of congestion. For this analysis we have used Level 4 (second highest) for both A628 and the alternative motorway route. It is clear that despite the extra distance the external costs are so much lower on the motorway that the diversion creates significant cost savings.

On the external cost values used, they will clearly change over time. It should also be noted that, since average figures have been used, there will be a major underestimate of the benefits to the National Park in terms of landscape and visual intrusion, as well as journey quality for all users, including those travelling by car.

Of course this does not account for the internal HGV costs – i.e. the cost of extra driver time and vehicle operations including fuel. These will increase and again the DfT standard

³³ See: *Tax Information and Impact Note for Heavy Goods Vehicle charging proposals*, DfT October 2012 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/232294/hgv-charging-tax-information.pdf

equations are published in the TAG Data Book and have been used for this indicative analysis.

For the time costs we have used an average extra time, calculated by running Googlemaps for the alternative route over different times of day and days of the week. For the other operating costs we have used the change in distance and average speed, the latter using the same Googlemaps data.

Finally we have considered the variable demand response using the standard elasticity applied to the additional costs. This has an important effect in the calculations. It does not reduce the benefit from removing HGV traffic from the A628 since this is a fixed saving. However it reduces the extra traffic on the alternative route. This efficiency improvement also reduces the external costs on the new route, albeit at a lower rate than on the A628. It also reduces the total increase in internal (operational) cost. Ideally the elements of all the HGV journeys would be broken down into different road types and recosted. Since this data is not available we have simply illustrated the cost changes by changing the cost increases in line with the elasticity.

This is far from perfect but is all that is possible given the data and is set out in Table 2.7. The results are clearly subject to much greater uncertainty and sensitivity to assumptions than the passenger based elements of the package. We show some key results from the tests which we have applied using the methods above to demonstrate the variability as well as a best estimate. In particular it makes the point that the elasticity value causes major changes in the BCR because the environmental savings from HGV traffic reduction are constant and significant. It is also the case that the actual daily difference between costs and benefits in the zero behavioural response (£987 across all HGV traffic) is small and a very small percentage of the total operating costs. Despite this it produces a strongly negative BCR. By contrast the inclusion of behaviour change for HGVs creates a massively positive BCR.

In view of this we also calculated a limiting value for behavioural change (using the behavioural options quoted above) needed to give the HGV control scheme a good BCR. This is very small at 0.05 especially compared to the national average of 0.9, and should be easily achievable given the range of options available. Moving forward we recommend a more detailed analysis of existing HGV movements to provide a more robust appraisal.

Table 2.7: HGV control scheme appraisal: local access allowed all options

	Averaged figures No elasticity	Elasticity 0.9	Limiting e value (.05)
Net external costs saved per day	£27,072	£27,072	£27,072
Gross increase in daily operating costs	£28,059	£2,806	£26,656
Net change in daily cost (positive is benefit)	-£987	£24,266	£416
Capital cost (2010 prices)	£974,400	£974,400	£974,400
BCR	-9.2	+226.2	+3.94

All prices 2010, first year results discounted over 60 years using Green Book rates

HGV control scheme conclusions

As stated earlier, the lack of data from NH has been a major obstacle to providing a precise economic analysis. However, our testing using standard values and techniques has revealed the following:

- 1 Even using average figures there would be significant savings in external costs by transferring HGV traffic from the A628 to the motorway network
- 2 These savings would be very close to the extra operational costs involved in the longer route, again using average figures
- 3 While the savings stay constant, the extra costs are very sensitive to behavioural change on the part of HGV operators (represented by the elasticity value)
- 4 Using a standard elasticity there would be major changes in behaviour and a very large positive BCR
- 5 Given the uncertainty and variation these extreme values are best viewed as sensitivity tests pending a full analysis
- 6 Given the very small change in behaviour needed to produce a reasonable BCR from the scheme, our conclusion is that the most likely outcome is a positive BCR

Our best estimate therefore is that the HGV control scheme would reduce external costs sufficiently to cover increases in the operational costs experienced by operators. The use of average figures for the analysis rather than values specific to the National Park are likely to underestimate the cost savings which adds to the confidence in this conclusion.

Overall results for Low Carbon Travel for Longendale and Glossopdale

Taking an overview of the economic performance is possible despite the different appraisal periods by weighting the individual BCRs according to the capital cost. The most difficult question was how to treat the high level of uncertainty over the HGV impacts. A conservative approach was adopted, including the capital cost of the HGV control scheme in the package but setting benefits at zero. Thus only the Low, High and Central BCRs for the other elements were included. This gave the following:

Table 2.8: Overall Economic Performance

	Low	Central	High
BCR	3.34	4.99	6.98

Overall this shows a strong economic case, with the central case for Low Carbon Travel in the DfT “Very High” category. For every pound of public money spent Low Carbon Travel would provide £4.99 of benefits for the central case. It is much stronger than the A57 Link Roads BCR which is in the “Low” category³⁴ and one which is more in tune with strategic policies. This is explored further in the following section where an analysis of the negative impact of the proposed scheme on policy, in particular carbon, is considered further.

³⁴ See <https://www.gov.uk/government/publications/dft-value-for-money-framework>

It is worth saying that sustainable travel schemes often score well in terms of BCRs and the score for this package is well within what might be expected. The exception is where sustainable packages involve large scale disbenefits to car and HGV traffic. In this case the changes for HGVs have been estimated separately and there are few disbenefits for car users. This is because queues are relocated rather than increased and the benefits from lower HGV use are used to create better walking and cycling conditions and improved bus and cycle priority. There would be some improved reliability for car users but this benefit is hard to estimate and has been omitted from the BCR above.

Part 3: Analysis of the National Highways A57 Link Roads proposal

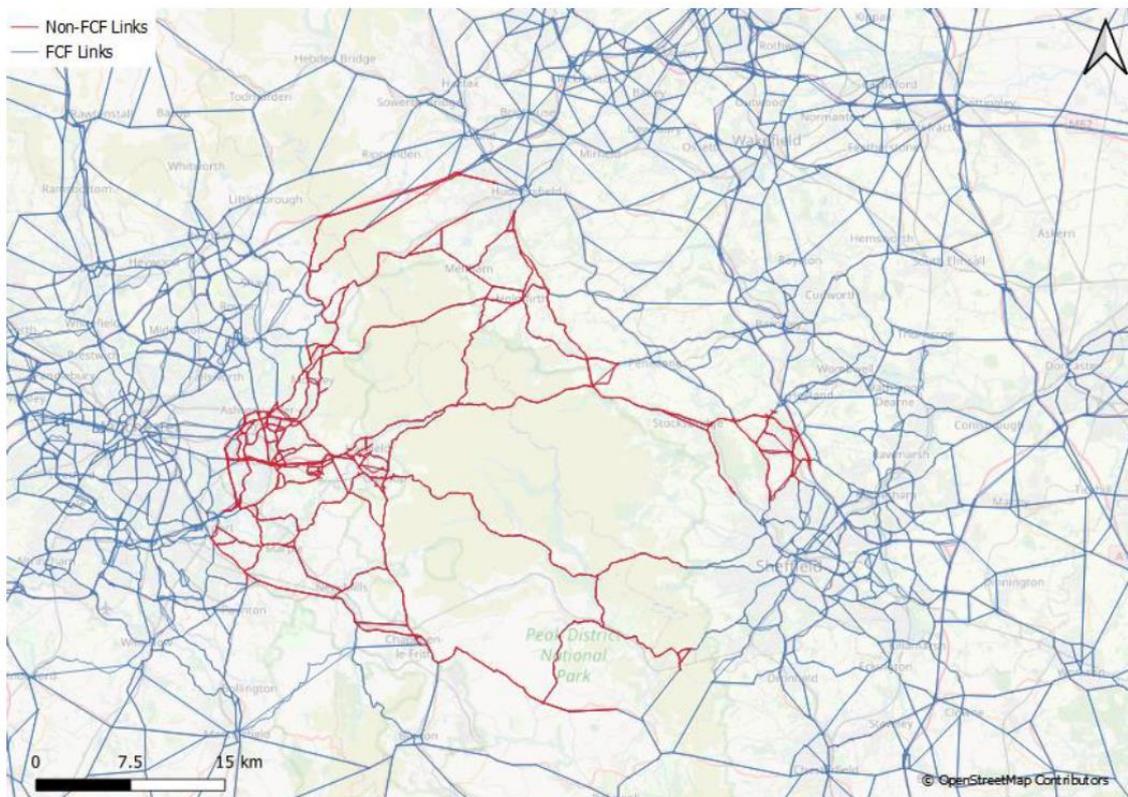
3.1 Modelling and the modelled area

NH used an existing large area simulation traffic model (SATURN) for their main assessment. The area covered is shown in Figure 3-1 (13.1 in the NH report) of the Combined Modelling and Appraisal report³⁵. This was supplied to CPRE following a data request and submitted to the Examination by CPRE as NH indicated it did not intend to submit the document. The wider model stretches from Liverpool to Grimsby and Harrogate to Matlock and includes Leeds and other major towns and cities at varying levels of detail.

It is normal to take such a broad model and produce greater detail in the area of interest. For example, NH have done this by expanding the model detail in the immediate neighbourhood of the scheme. This is called the Area of Detailed Modelling (**ADM**). What has not been done is to upgrade the level of detail for the modelling in the neighbouring areas where most of the traffic comes from and goes to: Greater Manchester. Although less traffic is related to Sheffield, this is not in the ADM either. This is clear in Figure 3.1 below, where the red network is essentially the ADM and the blue network has a Fixed Cost Function – i.e. it is not sensitive to changes in the cost of using the network caused by changing traffic patterns.

Figure 3.1 NH Map showing detailed and fixed cost networks

Figure 3-7 – Fixed Cost Function (FCF) area



³⁵ REP2-090 pdf page 608 of 790 <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-000782-A57%20Link%20Roads%20Additional%20documents%20-%20anne%20robinson.pdf>

In addition a further technique was used by NH to provide a stable model output. This is known as masking and reduces the impact of cost changes on traffic flows. The two techniques are described in the Combined Modelling and Appraisal report in section 13.7 on page 164 and 165³⁶.

It is clear from this that:

- Both Sheffield and Manchester are excluded from the detailed modelling
- Because of the base model’s overall size and strategic nature the networks within both cities are limited.

For this reason the modelling cannot represent the impact of the scheme on traffic patterns in Greater Manchester.

In relation to travel between the two cities, it is limited for two reasons:

- the cities themselves are outside the ADM and modelled at a low level of detail
- access to the A628 is included in the ADM but strategic routes which are likely to be affected to the North and South are not.

3.2 Uncertainty and the Uncertainty log

The TAG Unit on this subject, M4, dated May 2019, states in para 2.1.1:

“There are two sources of forecast error: uncertainty in the inputs (such as size of new housing development) and error in the model parameters and specification (how these inputs propagate through the model). The practitioner should summarise all known assumptions and uncertainties in the modelling and forecasting approach in an uncertainty log. The uncertainty log will also be the basis for developing a set of alternative scenarios. The alternative scenario is used to understand the possible impact of an error in assumptions on the model forecasts.”

This guidance is supplemented by the Uncertainty Toolkit, dated May 2021.

NH appear to have completed part of the log, relating to new development. They have not dealt with the second source of errors in terms of model parameters and specification. The Uncertainty toolkit gives more detail on what these might be in the table below.

Table 3.1: Extract from the DfT Uncertainty Toolkit

Technology	Economy	Behaviour
• Range of road vehicle types, and extent of technological standardisation;	<ul style="list-style-type: none"> • Economic performance; • Composition of labour market, different ways of working and changing business models; • Level of automation; 	<ul style="list-style-type: none"> • Use of digital infrastructure and services; • Level of car ownership and extent of licence holding;
Take-up of Connected Autonomous Vehicles and Electric Vehicles;	• Patterns of spatial development and changes in regional distribution.	<ul style="list-style-type: none"> • Level of vehicle occupancy; • Demand for active travel; • Adoption of new technologies;

³⁶ REP2-090 pdf pages 610 of 790 <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-000782-A57%20Link%20Roads%20Additional%20documents%20-%20anne%20robinson.pdf>

<ul style="list-style-type: none"> • Nature, sufficiency and cost of energy supply; • Connecting energy supply to vehicle energy demand. 		
Social	Political	Transport Supply
<ul style="list-style-type: none"> • Changes in demographic composition (e.g. ageing population); • Changes in public health; • Importance of equity; • Climate change impacts and response; • Potential disruption to transport systems. 	<ul style="list-style-type: none"> • Regulatory influence (e.g. road-pricing) • Decisions on national infrastructure projects; • Roles, responsibility and interconnectedness of the public and private sectors; • International action on decarbonisation. 	<ul style="list-style-type: none"> • Other transport investments • Availability of and demand for public transport; • Carrying capacity of the rail network; • Digital vs. physical connectivity for access; • Production to consumption supply chains;

Some of these are directly relevant to this scheme: for example most of the Behaviour and Transport Supply entries. Climate change responses and decarbonisation are also major sources of uncertainty.

To give a specific example, it appears that it is unlikely that the current central road traffic forecasts are compatible with achieving international and national obligations on climate change. Carbon reductions will be required at a faster rate. However, the DfT has provided scenarios for forecasting and in this case, especially given that this is within a conurbation (albeit outside the centre), a more specific demand management forecast would have been advisable. Overall management of car demand to reduce the central forecast is assumed within the Climate Change Committee’s sixth carbon budget report and subsequent work to translate the implications. At the very least this should have been in the Uncertainty log but it is so close to likelihood that it should have been included in the low forecast scenario.

In terms of alternatives, some of what is proposed by CPRE (demand management locally in Longdendale, and more widely across the National Park) is pretty much essential to achieving the carbon targets. To be effective it must transfer drivers from their cars (and achieve higher levels of car occupancy, as in Table 3.1 “Behaviour” column above and the DfT TDP).

Comparing what NH have done with the contents of Table 3.1 above, and WebTAG guidance, the conclusion is that NH have omitted a major part of the Uncertainty Log and have not undertaken an appropriate sensitivity test.

3.3: Conclusions on modelling

The two main conclusions are that:

- 1 The model is insufficiently detailed in areas where most of the traffic begins and ends – the negative impact of this is explored further in the next section.
- 2 Uncertainty – which is a key area of concern for modellers – is not dealt with in line with the latest DfT guidance and this is a particularly serious omission for carbon emissions and travel behaviour change.

3.4 Negative impact on local and national policies

Introduction

A key point that forms the basis of this report is that the proposed scheme is clearly within, and mainly affecting an urbanised area, not a rural one. Transport policy in such areas does not usually include major increases in road capacity such as this one. This applies to TfGM where they are not developing highway schemes themselves. They are however aware that others are, including NH and are obliged to acknowledge them in their plans.

The emphasis on sustainable modes in these urbanised areas is well established, however there are new Government and local policies which reinforce this even more strongly, and are reflected in legislation. These are driven primarily by climate change which has targets to move car drivers to sustainable modes. However, better health through Active Travel and air quality improvement are also key factors – discouraging car use is a key part of implementing those policies. It must follow that encouraging car dependency directly undermines it.

The key pathways for mode change in the latest policies include:

- From driver to passenger (car sharing/household consolidation). This is reflected in the Government target for increased car occupancy.
- From car driver to walking and cycling. This is reflected in the Government 2030 target “half journeys by walking and cycling” in towns and cities.
- From car driver to public transport. This is supported in Government policy statements but has no specific target. In GM there is the “50-50” target for sustainable modes overall by 2040, but this includes public transport.

One problem with assessing the negative impact of a scheme on a different scheme designed to promote a competing mode (as in this case) is that it is often expressed verbally or in a criteria analysis – for example red, green, amber. On the other hand the benefits of many schemes are expressed in hard money terms and cover a wide range of journeys which obscure the negative impact, for example on sustainable travel.

This has led some transport practitioners to introduce the idea of compensating within an individual scheme appraisal for negative impacts. For example the Decarbon8 partnership, which has as partners the Greater Manchester and the Sheffield Combined Authorities, and academic institutions such as Leeds Transport Studies Group, suggest this approach for carbon.

Nothing like this has been done in the current case and indeed would be difficult, since the extent of the sustainable transport modelling appears to be limited to car drivers who might choose public transport. This became clear during a technical meeting with NH (19 Jan 2022) and during the examination hearings it further emerged that there was only rail as an alternative mode, not bus. A further model was referred to by NH during the Issue Specific Hearing on public transport³⁷. Clarification from NH was requested but was not forthcoming. Our original request was simple: what were the public transport use figures for the Do Minimum and Do Something in 2025 and 2040? As far as we know this is not in the

³⁷ EV-041 Transcript Issue Specific Hearing 3, Session 1, 1:05:26
https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001279-TRANSCRIPT_ISH3_SESSION1_A57LINKROADS_05042022.pdf

modelling and thus not available. Given the location of this scheme and its potential impact on public transport, this was a major omission.

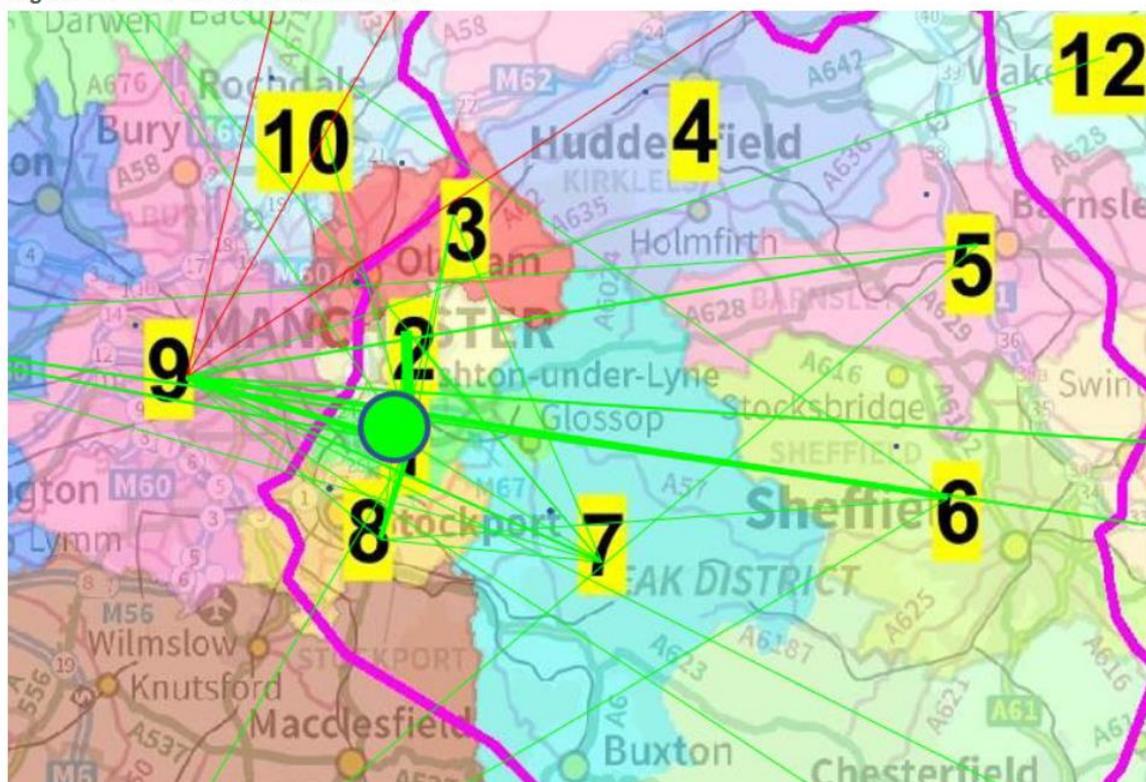
However the lack of monetisation of negative impacts need not be the case for all impacts. Indeed it must be true that if Government policy is to discourage car travel in certain circumstances, any encouragement to driving will need to be compensated for in a direct way. This extra expenditure will have to be in place just to maintain the relative competition between driving and sustainable travel before any new policies are implemented. The level of encouragement to driving is in fact measured by the A57 Link Roads model through the time savings and lower operating costs. The estimates which follow have been based on the detailed NH data requested which allows the monetised benefits in the relevant areas to be extracted.

The proposed A57 Link Roads: negative impact on sustainable travel

A key point in our analysis is that the main impact of the scheme is on car travel in urbanised areas (see REP5-028 page 12). This was not explained in our deadline 2 submitted material (REP2-070) as it required a new analysis of where the predicted benefits were located, using detailed information requested from and supplied by NH later. This was supplied in a 25 Sector format designed by them which is not perfect, but allows a reasonable approximation. The material first submitted by NH has a diagram which is not sufficiently clear for this to be done (which is why the detailed information was requested). Sector 1 is obscured by the green blob. The diagram is reproduced below.

Figure 3.2: NH map of areas of benefit

Figure 14-1 - TPU Benefit Distribution



The numbers in Figures 3.2 above and 3.3. below refer to the sector areas – Sector 1 obscured by the green blob is NH’s study area; Sector 2 is the remainder of Tameside; and so on as listed in Table 3.2

The actual matrix of benefits is supplied in Table 3.2 below. This shows the sector to sector flows including in the policy sensitive area. It is clear from this relatively cautious approach that two thirds of the benefits are in sectors where strong sustainability policies apply, from both central and local Government.

Data underpinning the negative impact

In terms of Table 3.2, the rows and columns are as supplied by NH and represent the origins and destinations of journeys in terms of the 10 local zones. The column labels across the top of the table represent the same areas as the rows. Thus column 1 is Mottram, column 2 is rest of Tameside and so on. Journeys entirely within the local area of Mottram (row 1 column 1) provide the greatest benefits to road users at £29.3m. Journeys from Mottram to the rest of Greater Manchester comprise the majority of road user benefits as shown by summing column 1 and comparing this figure of £117.7 million (2010 prices) with the total national benefits of the scheme of £178.7 million (again supplied by NH). 2010 prices are used by DfT and NH for appraisal so are used here. The comparison produces the figure of 65.9% for the proportion of road user benefits falling to local traffic. This is important because the whole of Greater Manchester is subject to the Right Mix policy and, as an urban area, to DfT's goal for 50% of all trips in urban areas to be made by active travel by 2030. It is therefore clear that even with this relatively cautious approach that two thirds of the benefits of the A57 Link Roads are to road traffic in sectors where strong sustainable travel policies and expenditure to support them are in force from both central and local Government.

Table 3.2: Matrix of A57 Link Roads' road user benefits

		Combined vehicle cost savings 2025 £million, 2010										
		1	2	3	4	5	6	7	8	9	10	
Study Area (Mottram)	1	29.3	5.1	1.6	0.2	0.1	0.8	1.7	3.1	7	0.8	49.7
Rest of Tameside	2	12.6	0	0	0	0	0.2	1.8	1.2	0.1	0	15.9
Oldham	3	2	0	0	0	0	0.3	0.8	0.5	0.1	0	3.7
Kirklees	4	0.1	0	0	X	X	X	X	0.1	-0.1	X	0.1
Barnsley	5	0.1	0	0	X	X	X	X	0.1	0.8	0	1
Sheffield	6	0.2	0.1	0.1	X	X	X	X	0.5	4.1	0.1	5.1
Rest of High Peak	7	0.4	0.6	0.3	X	X	X	X	0.2	1.9	0.2	3.6
Stockport	8	6.5	1	0.7	0.2	0.3	0.8	1.3	0.6	1.2	0.1	12.7
Manchester (North West Region)	9	11.2	0.3	0.2	0.6	3.5	6	2.4	0.7	0	0	24.9
Rochdale	10	0.6	X	X	X	X	X	X	X	X	X	1
		63	7.1	2.9	1	3.9	8.3	8.2	7	15.1	1.2	117.7

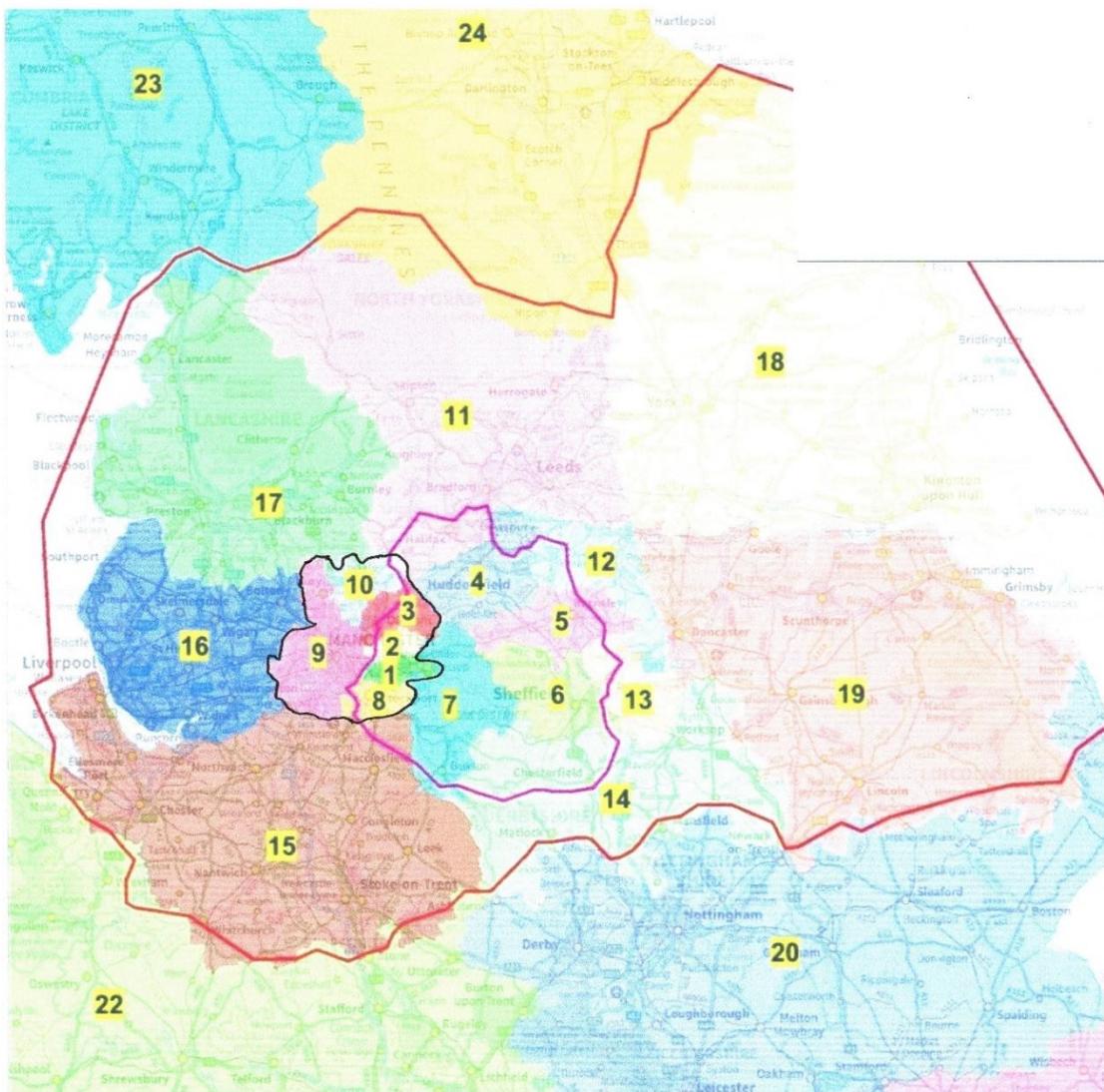
Orange is "masked" by NH - i.e. not counted. Total Benefit from scheme (NH data) 178.7 Percent local 65.9%

X This shows where flows have been excluded from the analysis by MTRU due to the Sectors not allowing precise definition of the urban areas

It is surprising that such an analysis was not done because one key reason that road capacity increases designed to speed up car journey times are not used in towns and cities is that this makes it harder to attract people onto alternatives. It would be against the laws of economics if that were not the case. The matrix analysis in Table 3.2 shows the extent of this problem. We have translated the 2010 price benefits into today's prices using the DfT factors which we estimate amounts to £146million over the appraisal period. The equivalent benefits must be offered to users of sustainable modes just to maintain the status quo, before encouraging the transfers required by the new policies.

To test this further, we have considered only those trips which are entirely within Greater Manchester. These still 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 referred to in the modelling section earlier. The area we have selected is the closest possible to Greater Manchester using the NH 25 sector system and is shown below outlined in black. As well as supporting the point that this is essentially a scheme with urban impacts which run counter to current policies, the figure below illustrates how much of Greater Manchester is outside the Area of Detailed Modelling (ADM) and thus why more detailed modelling should have been done in that urban area.

Figure 3.3: Map of areas included in the Greater Manchester only analysis



This also illustrates the confusion caused by the way NH supplied information during the Examination. In the map above (Figure 3.3) the area outlined in purple³⁸ is not the same as the ADM³⁹ which is smaller. In fact, it relates to another modelling function not used elsewhere. This map had to be used because the ADM map was not large enough to show the zones. It was supplied by NH in response to the CPRE request for data.

The next issue is how to represent this disbenefit to sustainable travel in a way which shows how much extra money would need to be spent now to compensate. This is because the benefit to drivers occurs each year over the whole appraisal period (although the costs are in the short construction period). We have therefore used the benefit profile in the Combined Economics and Modelling Report (Figure 14,2 REP2-090 page 635/790 in pdf) to translate the 60 year figure into an annual figure which shows the ongoing impact year by year – the same way the benefits unfold in the NH computer programme which produces the data for the economic assessment. The calculation is: annual benefit X 0.75 (to remove the impact on goods vehicles) X 0.659 (proportion of benefits in relevant area) X 1.24 (2010 prices to current prices). This illustrates (for the local authorities who have to implement the policies) how far sustainable travel spending would have to compensate each year into the future.

The benefit to drivers in the sustainable policy areas amounts to £3.75million in today's prices in the opening year (2025), rising to £7.4million in 2050 (again in today's prices and undiscounted). This illustrates the significant and growing negative impact the scheme will have on achieving local and national policies. Local budgets would have to find this money at least until 2050 but probably well beyond.

We have not considered the negative health aspects of discouraging active travel. Given the values used by DfT (for example in their AMAT tool) this would be a significant disbenefit.

In relation to value for money, the walking and cycling elements of the Low Carbon Travel package, which would achieve such policies, have been tested using the DfT's AMAT appraisal tool. That and the other approaches to testing value for money of the alternatives were set out previously in Part 2.10.

Above all this analysis illustrates the fact that the A57 Link Roads would significantly increase urban road capacity in the Greater Manchester area and as such is a significant anomaly in that area. It suggests that the development of alternatives would better meet the existing and most recent local and national transport policies. It would be possible for a joint approach by local authorities and the National Park to seek funding for alternatives from various sources including National Highways.

This illustrated another contradictory aspect of the approach to NH's A57 Link Roads. : NH's approach towards analysing the impact of the A57 Link Roads as a project appears inconsistent with its high level engagement with DfT on assessing sustainable travel, carbon and health impacts. Many practitioners including MTRU have witnessed this engagement first hand.

The conflict with current policies on carbon is considered in more detail in the following section.

³⁸ See REP2-090 Figure 13-1 Sector definitions, pdf page 608/790

³⁹ See REP 2-090 Figure 2-1 pdf page 17/790

Part 4: A57 Link Roads, Low Carbon Travel and conflicts with the carbon policy framework

4.1 Carbon emissions

Introduction

There is no doubt that policies on carbon emissions affecting this scheme have changed very significantly in the last few years. This includes legislation, such as net zero and Parliamentary acceptance of the Climate Change Committee's 6th Budget, policy statements such as the DfT Decarbonisation Strategy, and ongoing work revising guidance, for example the commitment in the Decarbonisation Strategy for a review of the National Policy Statement for National Networks (NPSNN) and the Secretary of State's statement to Parliament on 22nd July 2021 with a similar commitment. Meanwhile the existing NPS is in force. The A57 Link Roads Examination therefore took place immediately following a period of major change. However, that change had largely occurred and should have been fully taken into account.

Thus the Examination had to work in the context of what is in legislation and policy but not yet necessarily in habitual use by practitioners. This section seeks to clarify the position referring to the new legislative and policy context while still being guided by the NPS, in particular paragraph 5.17, which states:

It is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets. However, for road projects applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets.

Key questions to be answered

In relation to that statement there are five important questions considered in this section:

- 1) Which carbon should be counted and costed?
- 2) What is the real "Do Minimum"?
- 3) What is the cost of undermining Government and local policy?
- 4) What is significant?
- 5) What about the *de minimis* argument and the NPS?

1) Which carbon should be counted and costed?

In the current system, a marginal change is assumed between a Do Minimum and a Do Something future. To assess this, the appraisal must calculate how much carbon will be produced by the forecast levels of traffic. This is done in a simplified way by the DfT programme TUBA, and in a more complex way using DMRB guidance. NH have done both. The latter is used for the carbon cost calculations but not the economics. One reason is that TUBA covers a shorter time period than the DMRB method so is likely to be an underestimate.

The focus of interest for checking against policy however, should be consistency with the pathway to net zero, in particular that set out in the DfT TDP. For this reason, we requested this data from NH. They supplied TUBA carbon data (a standard output). The figures show that the total amount of carbon being emitted in a year is far higher in future years and does not meet the net zero pathway. NH did not consider this relevant – they only consider the marginal change between the Do Minimum and Do Something. This is completely inadequate for a strategic level test. The reduction in carbon from vehicle electrification is clear in the NH forecast, although it did not reach zero in 2051.

In fact, the cost of the Do Something in carbon terms should be tested against what the Government considers is essential to meet its climate change obligations. If the Do Minimum is

assumed to fail to meet Government commitments it cannot be considered to be a realistic prediction of future travel patterns. Policies such as those in the TDP and locally in the TfGM 50-50 programme are designed to achieve the pathway. Schemes which do not contribute, or, as in this case, undermine any programmes which would support the pathway, should not proceed. The key assumption by NH in the Do Minimum is that nothing would be achieved by central or local Government expenditure and this cannot be the correct basis for comparison. It was to test this that carbon emission data for the DM and DS were requested from NH. In fact, only TUBA data was available but at least provides a minimum guide.

Therefore the question considered here is how much of that total carbon is in excess of the amount required to meet the net zero/6th Carbon Budget requirements.

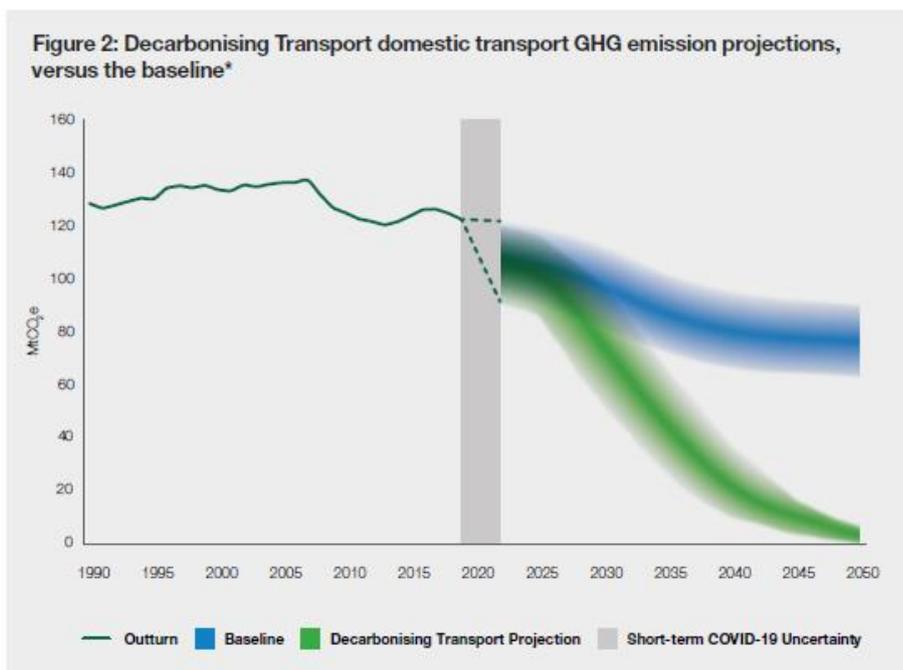
Table 4.1: Carbon emissions A 57 Do Something Core forecast

CO2e emissions based on TUBA (tonnes) per year	Do Minimum	Do Something
2025	641379	641842
2040	503272	503643
2051	480538	480650

Source: NH TUBA outputs

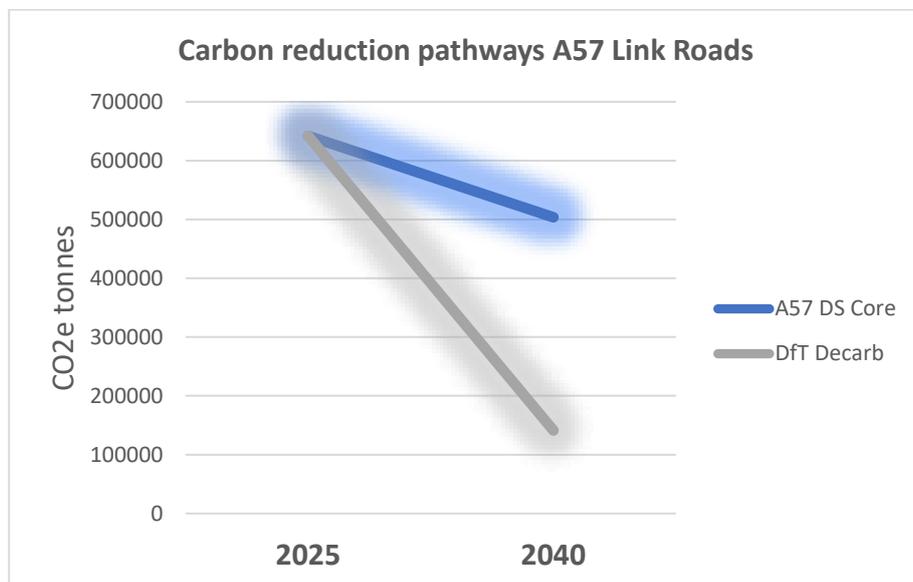
The first step was to look at the data in Table 4.1. This shows that the Do Something presented in the A57 Link Roads case shows clearly that there will be, after allowing for some electrification of the car fleet up to 2050, insufficient decrease in carbon to meet Government requirements. These are reflected in the chart in Figure 2 (page 45) of the Decarbonisation Strategy, shown below as Figure 4.1. The blue pathway is a Business As Usual baseline, the green pathway what should be achieved by TDP policies and programmes (containing both infrastructure and behavioural elements).

Figure 4.1: Extract from Transport Decarbonisation Plan



To test whether the future with the A57 Link Roads in place would meet the targets, the current scheme data from TUBA in Table 4.1 is set out in Figure 5.2 below.

Figure 4.2: Comparison of A57 Link Roads forecast with DTS



Note: NH does not seem to include latest Government plans in its modelling

Obviously we only have the data supplied by NH but the key point is that the NH best estimate shows the scheme as presented is delivering a huge amount of carbon in excess of the Government legally confirmed targets. Our serious reservations on this are included after Table 4.5 below.

Of course, a more aggressive electrification programme could deliver further reductions, together with HGV electrification, for example through overhead catenaries similar to those used for rail. These are being trialled by NH but are extremely unlikely to be achievable in the National Park - possibly achieving an HGV ban by default. This possibility should have been included by NH in the Uncertainty Log. However, some demand reduction will be required even with vehicle electrification. This is clear in the Climate Change Committee’s (CCC) 6th Budget.

The table below is extracted from the CCC transport sector document published with the 6th Carbon Budget. We use this since it provides the core targets which underpin the TDP.

Table 4.2: Range of car traffic reductions from different measures

	Traffic		Trips	
	Tech (e.g. home working)	Car occupancy	Walk and cycle	Bus
2030	-1 to -4%	-6%	-5 to -7% (-1 to -2%)	-9 to -12% (-5 to -7%)
2050	-4 to -12%	-19%	-9 to -14% (-3 to -4%)	-17 to -24% (-10 to -14%)

The CCC give trip reductions for sustainable modes rather than traffic (distance travelled). These are likely to be higher than the traffic reductions would be because of lower trip lengths⁴⁰. Using

⁴⁰ This can be compensated for by substituting a short walk trip for a longer car trip but is not included in this analysis.

the standard NTS data for average trip length which CCC uses, the trips have been converted to vehicle kilometres to produce the parenthetical figures in italics. The extensive work by CCC is used for the final central requirements in Table 4.3 below. These are reductions on the baseline – i.e. in real terms traffic is predicted to grow (as in the A57 Link Roads NH appraisal) but the CCC identifies the required reduction on that figure.

Table 4.3: 6th Carbon Budget combined demand management required

	Combined impact: car traffic reduction on baseline (as vehicle kilometres)
2030	-6%
2040	-12%
2050	-17%

Note: 2040 is derived from CCC table as a half way point

This does not appear to be taken into account in the NH traffic forecasts. What should happen is that a future scenario which achieves these reductions should be compared to the Do Something scheme, which is clearly part of a future which encourages driving rather than the modal and behaviour change required by the CCC 6th Budget.

There is thus a lack of basic data for this scheme, even in the context of the Examination in Public, which has been a source of ongoing problems reflected throughout this report. This makes it hard to be precise about how much additional carbon over the level required to meet the 6th Carbon Budget, is being produced.

The best indicator supplied so far is the NH “Low” forecast. This applies a lower car use forecast to the model and thus produces lower carbon emissions and outputs them for TUBA. The lower forecast is due to factors different from the CCC demand reductions such as lower economic growth and higher trip making. It is thus not the same as the CCC reductions although it goes some way towards them.

The key point is that it has been run through the transport model to predict the carbon emissions for a demand managed forecast in a form comparable to that for the NH’s best estimate of carbon emissions with the scheme in place. The reductions with the scheme in place (mainly due to electrification of vehicles) can thus be compared to the reductions from the lower demand forecast. This reveals reductions as below which can then be compared to the CCC predicted reductions with a slower rate of car traffic growth.

Table 4.4: Carbon emissions A 57 Link Roads Do Something Core compared to Do Minimum Low

Target year	Reductions
2030	-6.3%
2040	-9.2%
2050	-10.9%

While 2030 Low forecast is close to the 2030 CCC reduction (in Table 4.3), the Low forecast increasingly underperforms at the required level. Despite this it is possible to use the Low forecast to indicate the missing amount of carbon reduction and, interestingly, its cost.

The TUBA table supplied by NH is shown below, with the carbon emission differences calculated by MTRU.

Table 4.5: NH TUBA carbon outputs

	Core Scenario			Low Growth Scenario			
GHG Benefit from DMRB (£m, 2010 PV)	-17.45			Not assessed			
GHG Benefit from TUBA (£m, 2010 PV)	-0.46			-0.79			
CO2e emissions based on TUBA (tonnes)	DM	DS	DS – DM	DM	DS	DS – DM	Difference tCO2e
2025	641379	641842	462	601341	602011	668	40,501
2040	503272	503643	371	457101	457433	330	46,542
2051	480538	480650	113	428,325	428610	286	52,325

The differences between the two can be annualised assuming a straight line. These can then be put through the DfT carbon cost toolkit to provide an estimate of additional carbon cost.

This produces a cost of £223million over the 60 year appraisal period and would turn the BCR for the scheme negative.

As a test of whether the carbon deficit is robust, the carbon toolkit was run against a cut-off date of 2051 (on the optimistic assumption that everything is net zero by then). This still produced a carbon cost of over £120million.

At this stage we wish to say that there must be serious concerns over the way in which carbon has been treated overall for this scheme. Our view is that the modelling includes some electrification but apparently not the latest commitments in 2030 and 2035. For this reason much of the NH work must be considered with a high level of uncertainty. However, at the moment everything calculated for this submission has followed the same procedures as NH so can be directly compared. At a late stage some additional statements were produced and it appears that these were not based on modelling and gave no detail of how they were derived⁴¹. Requests for clarification have so far remained unanswered.

2) *What is the real “Do Minimum”?*

This issue is familiar to transport practitioners and is directly related to, and follows on from, the previous section. In the current system, a marginal change is measured between a Do Minimum and a Do Something. This approach was justifiable when comparing futures in which the existence of the Do Something was totally disconnected from the Do Minimum, in this case building more road capacity in Greater Manchester is assumed to have no impact on what the future transport programmes without such capacity would be. Hence the same core forecast is used for both in the NH analysis. This is fundamentally wrong in cases such as this in complex outer/inner metropolitan and mixed areas.

⁴¹ REP5-025 [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001105-TR010034_9.58_Schedule_of_change_to_book%20of%20reference%20\(tracked\)%20D5%20230222.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001105-TR010034_9.58_Schedule_of_change_to_book%20of%20reference%20(tracked)%20D5%20230222.pdf)

In reality there are two different futures being considered, the first is one in which there is less traffic, which requires a shift in competitive advantage toward sustainable modes. The other is one in which driving is given sufficient encouragement that traffic will continue to rise. The latter is the core forecast.

DfT had already moved to what it calls “scenario” forecasts in 2015 which allow for different assumptions about the future. It has also published the Uncertainty Toolkit, which suggests that the modelling and forecasting parameters should be considered, including the impact of demand management and behaviour change. This was set out in more detail in Part 3.2 so is not repeated here. However this guidance, which was ignored by NH, has moved away from the old “low, central, high” forecasts.

It is also important to say that this is not dealt with by modest adjustments to trip making in the modelling through the Diadem software. The A57 Link Roads modelling starts with the same base forecast and has only minor impacts, as shown clearly in the NH documentation. A significant section of Diadem was turned off for the NH modelling in any case. Evidence of the widespread understanding and acceptance by the profession of the approaches set out in answer to questions 1 and 2 posed above can be found in the joint local authority/professional body submission on Green Book reforms, PTRC papers and the TPS Annual Review extract in the Annex to REP4-031⁴²). Much of this is reflected in the Uncertainty Toolkit and WebTAG.

3) *What is the cost of undermining Government and local policy?*

The second issue is the strategic fit of the scheme with relevant national and regional policies on carbon, including how it fits with CCC budgets. It is clear that encouraging people to use alternatives to the car needs to make them relatively more attractive. This can be done by making them faster or cheaper or more convenient (in the case of buses more frequent as well). The other method is to make car use less convenient or costly. Such approaches are well known and often referred to as “stick and carrot”. As stated earlier in this report, anything which makes car journeys faster will move that balance of competition against sustainable travel, i.e. creates a carrot in the wrong direction.

At the moment Government policy is focussed on travel in towns and cities and there are clear targets for changes in the mode share for walking and cycling, and indications that mode switch is desired for public transport.

Using the information now obtained from NH it has been possible to assess how much of the economic advantage is provided to car use reasonably considered to fall within the scope of those targets (see page 36). This information is not in the original NH submissions to the Examination.

Another approach to this has been suggested by Professor Greg Marsden from the Decarbon8 partnership. This includes academia and local authorities (including Manchester and Sheffield) and runs a number of innovative projects. He proposes that schemes which have forecasts in excess of the CCC required reductions should identify specific additional reductions elsewhere and count the cost in the appraisal⁴³. This would provide an alternative and perhaps more realistic approach than simply costing the extra using the carbon toolkit.

⁴² REP4-031 <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-001045-CPRE%20PDSY%20-%20Other-%20response%20to%20ISH%20%20and%20written%20summary%20of%20oral%20sub%20mission.pdf>

⁴³ For example see: <https://decarbon8.org.uk/is-this-new-road-ok/>

4) *What is significant?*

In this report the question of whether NH has counted the amount of additional carbon correctly has already been considered. However, it is important to note that there was also an issue over the significance of the amount estimated by NH and used for its carbon cost assessment. During the Issue Specific Hearing⁴⁴ it was clear that a straightforward and widely accepted definition of what was a significant amount of additional carbon was not available. This is related to the NPS statement and the *de minimis* argument is considered in the next question. On significance overall there are two critical aspects:

- a. was the amount calculated by NH significant?
- b. Should the significance of the amount used by NH be viewed in isolation or in light of other similar proposal to increase road capacity?

In relation to the first aspect, the 401,000 tonnes of extra CO₂e calculated by NH can be judged against published emission reductions which are part of the net zero strategy and 6th Carbon Budget. For example, the Climate Change Committee estimates that an average battery electric vehicle (BEV) bought today will “save more than 35 tonnes of CO₂ over their lifecycle versus a conventional equivalent”.⁴⁵ Thus to compensate for the A57 Link Roads carbon deficit an extra 11,457 BEVs would have to be bought this year, above what would otherwise be the case. This number rises over time because conventional vehicles are getting more efficient, for example if they had to be bought in 2025 the number would be higher.

An alternative would be to consider the Government’s urban policies for walking and cycling, these are estimated to save between 1million and 6million tonnes CO₂e by 2050, clearly displaying a high level of uncertainty about what would be achieved. The A57 Link Roads carbon deficit (over a longer timescale) would be 40% of the lower figure and 7% of the higher figure. The cost of the measures to achieve the 1-6million tonnes reduction is £2billion over the first 5 years. Despite the wide range in estimated impact, using extra measures of this type to compensate for the A57 Link Roads carbon deficit would be in the hundreds of millions of pounds. This confirms the conclusion from Table 4.5 that including the correct amount of carbon from the scheme would turn the BCR strongly negative, even using the Government’s current values.

The “in isolation” issue is related to final question considered here: *de minimis*.

5 *What about the de minimis argument and the NPS?*

The final issue is probably the best known - the *de minimis* argument – where the amounts of carbon from an individual action (or scheme) are considered too small on their own to undermine carbon reduction, even when part of a wider programme.

This is subtly different from the significance issue – if there was doubt over whether the amount was significant or not, is it really an isolated event or part of a wider programme?

This has been argued over extensively and to summarise: if this scheme were an isolated occurrence with no accompanying or associated actions or schemes this might possibly apply. It might be the case if there was only one road scheme in RIS2 or elsewhere in the UK. Clearly this condition does not hold true. A further issue is that the existence of a number of schemes to increase road capacity underpins the road traffic forecasts (and has done since the 1997 forecasts).

⁴⁴ EV-033 ISH 2 Day 2 Session 1, 45:16 onwards https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010034/TR010034-001000-TRANSCRIPT_ISH2_DAY2_SESSION1_A57LINKROADS_10022022.pdf

⁴⁵ Box M2.2 on page 18 of the Transport Sector document of the CCC 6th Carbon Budget Sector Summaries: <https://www.theccc.org.uk/publication/sixth-carbon-budget/#sector-summaries>

The NPSNN states that:

5.17 Carbon impacts will be considered as part of the appraisal of scheme options (in the business case), prior to the submission of an application for DCO. Where the development is subject to EIA, any Environmental Statement will need to describe an assessment of any likely significant climate factors in accordance with the requirements in the EIA Directive. It is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets. However, for road projects applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets.

The DfT Transport Decarbonisation Plan (TDP) says:

The current National Policy Statement (NPS) on National Networks, the government's statement of strategic planning policy for major road and rail schemes, was written in 2014 – before the government's legal commitment to net zero, the Ten Point Plan for a Green Industrial Revolution, the new Sixth Carbon Budget and most directly the new, more ambitious policies outlined in this document. While the NPS continues to remain in force, it is right that we review it in the light of these developments, and update forecasts on which it is based to reflect more recent, post-pandemic conditions, once they are known.

While that review has yet to take place, the statement supports the approach set out in this report in many sections, the forecasting to reflect net zero policies and programmes, the newly structured uncertainty log and the carbon strategy assessment. For example, the real comparison for carbon emissions is between a package of sustainable measures with less traffic and the scheme as proposed with the central traffic forecast and 'business as usual' of which it is an integral part.

There is thus a strong argument for finding against this scheme in light of the ongoing plans locally and nationally to decarbonise transport. However it would be wrong to ignore the fact that the NPS statement itself has always contained a lack of credibility in relation to its impact. It is clear, for example, that the failure of one person to purchase an electric car is very, indeed extremely, unlikely to derail the Government's carbon reduction target. If everyone adopted this approach, i.e. not in isolation, the Government's policy would fail completely.

HA and now NH road schemes are not promulgated in isolation – the *de minimis* argument does not hold in any normal sense. Yet the carbon increase forecast by NH is an isolated figure. It assumes that there is no relationship between this scheme and RIS2 as a whole. A more realistic question in this context would be: what would the position be if every scheme in RIS2 produced as much carbon as the A57 Link Roads?

The key point is that it is not a question of marginal change: schemes should be supporting these targets and not undermining them, both in terms of increasing carbon but in terms of negating the impact of other policies.

In the A57 Link Roads case there is capital expenditure of about £180million in today's prices. RIS2 is valued at £24.5billion but about £14billion is on capital schemes. If all of them produced as much carbon as the A57 Link Roads, it would amount to over 31million tonnes of CO₂e. This is approaching the estimate for the total impact of electrifying the whole bus and coach fleet in the Decarbonisation Strategy (35-37million tCO₂e). The total impact of electrification of all cars, taxis and vans is 620-850million tCO₂e removed.

RIS2 should not allow schemes to remain in the programme which produce carbon on a scale which, if replicated, would fail to meet the level of reduction required if the Government target is to be met.

4.2 Costing carbon

There are two remaining issues on carbon which need to be addressed:

- The new valuations for carbon and impact on the BCR
- The issue of carbon persistence and its importance in assessment beyond the one-off cost.

New carbon value

NH did not supply their carbon spreadsheet so CPRE had to undertake its own calculation using the current carbon tool and this was confirmed by NH as accurate. It increased the central estimate for carbon cost significantly from -£17.45 to -£30.21 million. The low to high range also increases significantly.

To illustrate the impact, the following tables are set out. They show the results from the DfT carbon tool to create a high to low range of outcomes based on the NH traffic modelling. The tables can be compared to the ones in the existing NH documentation. Where there are disbenefits, for example accidents, air quality and carbon, these are shown as negative values. The first applies the low and high carbon values across the three traffic forecast scenarios: Low, Core and Optimistic (High).

Table 4.6: Impact of New Carbon Values

New carbon values: High to Low			
	Low Growth	Core Growth	Optimistic Growth
User benefits (TEE)	£153.44	£181.25	£210.19
Accident benefits	-£7.33	-£7.33	-£7.33
Indirect Taxation	£1.90	£1.41	£1.79
Greenhouse gas benefits	-£45.32	-£30.21	-£15.02
Air quality	-£3.77	-£3.77	-£3.77
Noise	£3.17	£3.17	£3.17
Delays during construction	-£1.04	-£1.04	-£1.04
Total (PVB)	£101.05	£143.48	£187.99
BCR	0.94	1.33	1.75

Table 4.7 displays a constant central value for carbon emissions for low and high as well as central forecasts. This does not seem logical but NH argued this was more comparable to their approach so we have recalculated it to show the impact. The key point remains valid.

Table 4.7: Impact of New Carbon Values: Constant Central

New carbon values: Constant Central			
	Low Growth	Core Growth	Optimistic Growth
User benefits (TEE)	£153.44	£181.25	£210.19
Accident benefits	-£7.33	-£7.33	-£7.33
Indirect Taxation	£1.90	£1.41	£1.79
Greenhouse gas benefits	-£30.21	-£30.21	-£30.21
Air quality	-£3.77	-£3.77	-£3.77
Noise	£3.17	£3.17	£3.17
Delays during construction	-£1.04	-£1.04	-£1.04
Total (PVB)	£116.16	£143.48	£172.80
BCR	1.08	1.33	1.60

In both tables the BCR falls significantly and is far below what we estimate for Low Carbon Travel. In view of the sensitivity of the scheme area adjacent to the National Park, and the fact that a majority of the traffic on the scheme travels through the Park, actions which encourage such traffic should be subject to the most rigorous assessment.⁴⁶ Damage to the Park would require a major justification and the BCR, at the lower end of what transport schemes, including road schemes, should achieve provides no such justification.

4.3 The real impact of carbon

The final issue to be addressed is how to measure failure to achieve carbon targets. This is not fully captured by the cost estimates.

Emissions are usually measured in tonnes of CO₂ equivalent (tCO₂e), and this the standard measure. The key objective, now enshrined in UK policy and across the world is to avoid a specific level of global warming, such that a catastrophic level of climate change can be avoided. The agreed critical end date is 2050. The level of warming depends, not on the tonnes emitted, but how long their warming effect lasts. Carbon dioxide persists as a warming influence for around 100 years. In relation just to the 2050 target, a tonne emitted now will have its warming effect for 30 years.

The failure to use the correct metric initially has had clear adverse results on the NH appraisal. Reducing tonnes emitted now is underestimated in assessment against objectives to avoid climate change, while reducing tonnes emitted later may be politically easier, and heavily discounted, but has far less benefit. These flaws were extensively discussed during 2007-2008, and led to the Climate Change Committee devising the budget periods for emissions. This is not perfect but seeks to address this problem.

⁴⁶ The National Park Authority opposes the A57 Link Roads and supports alternatives

A true assessment of carbon impact should take this into account (as do the Climate Change Committee forecasts). This is especially important because any carbon emitted now will still be having a warming effect past the target date for zero emissions and be contributing to temperature rise. Any excess over budget emitted now requires a proportionately higher reduction later, and this increases over time. It would be better to measure carbon in tonne years rather than tonnes for the purpose of our commitment to carbon reduction and keeping the temperature rise to 1.5 degrees. It is what is needed to achieve the target of avoiding climate change and would improve the way that demand management and active travel is treated in appraisal.

5 Conclusions

5.1 A new approach

The Low Carbon Travel package developed here, and subjected to a local engagement process, directly addresses the problems identified over many years along the trunk route⁴⁷.

It meets the strategic objectives of the A57 Link Roads; is feasible and deliverable; and provides Very High value for money with a BCR of 4.99 using our central assumptions.

It also avoids the adverse effects of the proposed A57 Link Roads and distributes benefits over a wide area, in particular bringing relief to other villages.

It therefore represents an option that requires full and proper testing before proceeding to a scheme which increases road capacity.

All this has been demonstrated despite the lack of information provided by NH.

5.2 A flawed appraisal of the A57 Link Roads

This view is reinforced by our analysis of the A57 Link Roads, which shows clearly that NH's formal appraisal has been deficient.

It has not assessed the impact of the scheme on HGV traffic demand and on public transport.

The modelling is insufficiently detailed in areas where there are major impacts and has had its sensitivity in such areas reduced through techniques such as fixing costs and "masking".

The forecasts have not been set within the framework of current Government and Greater Manchester policies for reducing car trips and increasing active travel and public transport use.

Uncertainty in modelling and forecasting has not been dealt with robustly, in particular the DfT Uncertainty Toolkit has not been followed and the Uncertainty Log is incomplete in key areas.

The carbon emissions assessment did not reflect the new carbon values which NH recognise are correct.

The carbon assessment did not reflect the key issue of non-conformity of the scheme forecast with the pathway in the DfT Transport Decarbonisation Plan. Within limited financial resources, schemes which do not contribute to the carbon reduction pathway, should not proceed. This is strengthened by the fact that in this case the scheme significantly undermines programmes which would support it.

5.3 Way forward

There would therefore be merit in refusing the A57 Link Roads DCO and asking NH to urgently commence:

- 1 Repeating the local options appraisal afresh, with our *Low Carbon Travel* measures fully developed and tested in light of the established local and national policies for achieving healthy and sustainable travel
- 2 Developing a similar strategic approach for the whole corridor, reflecting
 - i. National Government's pathway to carbon reduction, in particular the TDP;
 - ii. The special nature of the National Park and PDNP's policies for traffic management;
 - iii. the transport policies of cities which the road is designed to serve including Sheffield as well as Manchester.

⁴⁷ Except for maintenance and asset condition where technological improvements have already been made by NH

Annex 1

**Extract from Local Walking and Cycling Infrastructure Plans, Guidance for Local Authorities,
DfT April 2017**

Chapter 6

6.33 Improvements that can potentially be implemented to address existing deficiencies may include the following:

- **new walking links**
- **additional pedestrian crossings**
- **improving existing pedestrian crossing facilities, e.g. crossing width, introducing refuges, reducing waiting times, and/or increasing crossing times**
- **replacing broken/uneven/rocking pavements**
- **resurfacing footways**
- **improving street lighting**
- **providing CCTV security cameras**
- **increasing pedestrian capacity (Pedestrian Comfort Levels) by widening footways and/or reallocation of carriageway space**
- **removing street clutter**
- **reducing traffic speeds, e.g. by introducing 20mph limits/zones and providing traffic calming features**
- **providing dropped kerbs and tactile paving**
- **improving signage and wayfinding**
- **improving planting, shade and shelter**
- **improving seating facilities to enable people to rest**
- **general improvements to the public realm, encompassing some or all of the above**

Annex 2: Initial Option Assessment 2015

Initial Sifting Criteria

Each option must meet the following sifting criteria to be considered further within EAST:

- 1: Overall moderate impact against identified problems (Appraisal score >4)
- 2: Overall moderate fit with route objectives (Appraisal score >3)
- 3: Must be deliverable in theory
- 4: Must be feasible in theory

Qualitative assessment against identified problems		Qualitative assessment against identified objectives		Deliverability (e.g. political, planning, timescale or third party issues)		Feasibility (e.g. physical constraint, land availability and design standards)	
2	Large beneficial impact	2	Large beneficial impact	Deliverable in theory	Feasible in theory		
1	Beneficial impact	1	Beneficial impact	Deliverable but with challenges	Feasible but with challenges		
0	Neutral / marginal impact	0	Neutral / marginal impact	Very difficult to deliver	Not feasible / significant challenges		
-1	Adverse impact	-1	Adverse impact				
-2	Large adverse impact	-2	Large adverse impact				

Reference (Route Section-Intervention)	Option Description	Problems (EAST Scale of Impact)							Objectives (EAST Fit with Other Objectives)							Deliverability	Feasibility	Initial Sifting Criteria Prior to EAST				Take to EAST	
		1	2	3	4	5	6	7	Total	1	2	3	4	5	6			Total	1	2	3		4
1.0	A628 HGV Control (inc. complementary sustainable measures)	-2	0	1	0	0	2	1	6	-1	1	1	1	0	2	4	Very difficult to deliver	Feasible but with challenges	✓	✓	✗	✓	✗
2.0	A628 Peak Period Only HGV Control (inc. complementary sustainable measures)	-2	0	1	0	0	2	1	6	-1	1	1	1	0	2	4	Very difficult to deliver	Feasible but with challenges	✓	✓	✗	✓	✗
3.0	M67 to A616 Link Road	1	0	0	0	1	1	1	4	1	0	1	1	1	1	5	Deliverable but with challenges	Feasible but with challenges	✗	✓	✓	✓	✓
4.0	A57 Mottram One-Way	1	0	0	0	1	1	2	5	1	0	1	1	1	1	5	Deliverable but with challenges	Feasible but with challenges	✓	✓	✓	✓	✓
5.0	Dual Carriageway Link Road M67 to A57 Mottram Moor (tunnel under Roe Cross and spur connecting to A616)	1	0	0	1	1	1	2	6	1	-1	1	2	1	1	5	Deliverable but with challenges	Feasible but with challenges	✓	✓	✓	✓	✓
6.0	A57(T) to A57 Link Road	1	0	0	0	1	1	1	4	1	0	1	1	1	1	5	Deliverable but with challenges	Feasible but with challenges	✗	✓	✓	✓	✗
7.0	Bypass of Mottram, Hollingworth and Tintwistle	1	0	0	1	1	2	2	7	2	-1	1	2	1	1	6	Deliverable but with challenges	Feasible but with challenges	✓	✓	✓	✓	✓
8.0	M67 to M1 Dual Carriageway Link Road	1	1	0	2	2	2	2	10	2	-2	-1	2	1	1	3	Very difficult to deliver	Not feasible / significant challenges	✗	✗	✗	✗	✗
9.0	M67 to M1 Trans-Pennine Tunnel	-2	2	0	2	2	2	2	12	2	1	2	2	2	1	10	Very difficult to deliver	Feasible but with challenges	✓	✓	✗	✓	✗
10.0	A628/A616 Selected Dualling	1	0	0	1	1	1	0	4	1	-1	0	1	1	1	3	Very difficult to deliver	Feasible but with challenges	✗	✗	✗	✓	✗
11.0	A628/A616 Dualling	-2	1	0	2	2	2	0	9	1	-2	-1	1	1	1	1	Very difficult to deliver	Feasible but with challenges	✓	✗	✗	✓	✗
12.0	A61 Dualling	1	0	0	1	1	1	1	5	1	0	0	1	1	1	4	Deliverable but with challenges	Feasible but with challenges	✓	✓	✓	✓	✓
13.0	Climbing Lanes	1	0	0	1	1	1	0	4	1	-1	0	1	1	1	3	Deliverable but with challenges	Feasible but with challenges	✗	✗	✓	✓	✗
14.0	Route Safety Improvements	-2	0	1	0	1	0	0	4	0	0	0	0	0	2	2	Deliverable in theory	Feasible in theory	✗	✗	✓	✓	✗
15.0	A616 Widening at Midhopestones	1	0	0	1	1	1	0	4	1	0	0	1	0	1	3	Deliverable but with challenges	Feasible but with challenges	✗	✗	✓	✓	✗
16.0	A616 Langsett Widening Scheme	1	0	0	1	1	1	0	4	1	0	0	1	0	1	3	Deliverable but with challenges	Feasible but with challenges	✗	✗	✓	✓	✗
17.0	A616/A628 Flocch Junction Improvement Scheme	1	0	0	1	1	1	0	4	1	0	0	1	0	1	3	Deliverable but with challenges	Feasible but with challenges	✗	✗	✓	✓	✗
18.0	A628 Salters Brook Scheme - Carriageway Realignment	1	0	0	1	1	1	0	4	1	0	0	1	0	1	3	Deliverable but with challenges	Feasible but with challenges	✗	✗	✓	✓	✗
19.0	Slow Vehicle Refuges	1	0	0	0	0	1	0	2	1	0	0	1	0	1	3	Deliverable but with challenges	Feasible but with challenges	✗	✗	✓	✓	✗
20.0	Technology Package	1	0	2	0	0	0	0	3	0	0	0	0	1	0	1	Deliverable in theory	Feasible in theory	✗	✗	✓	✓	✗
21.0	Maintenance Strategy	0	0	0	2	2	0	0	4	0	0	0	0	1	0	1	Deliverable in theory	Feasible in theory	✗	✗	✓	✓	✗
22.0	A628 Peak District Tunnel	1	2	0	1	2	2	1	9	2	1	1	2	1	1	8	Very difficult to deliver	Feasible but with challenges	✓	✓	✗	✓	✗
23.0	Sustainable Transport Measures	1	0	0	0	0	0	0	1	0	0	1	0	0	1	2	Deliverable but with challenges	Feasible but with challenges	✗	✗	✓	✓	✗

Problems

1	Accidents reduce journey time reliability, with high accident rates on some routes and a number of accident clusters
2	Severe weather causes road closures which reduce journey time reliability
3	There is a lack of technology to assist in the operation and management of the routes and provide information for travellers
4	Maintenance on single carriageway sections reduces journey-time reliability.
5	Asset condition, including the standard, age and damage to infrastructure, reduce journey-time reliability through significant maintenance operations and risk from closures
6	Journey-times are increased by delays at junctions and the geometry and topography of routes
7	Long term traffic growth will bring some urban sections of routes to their capacity

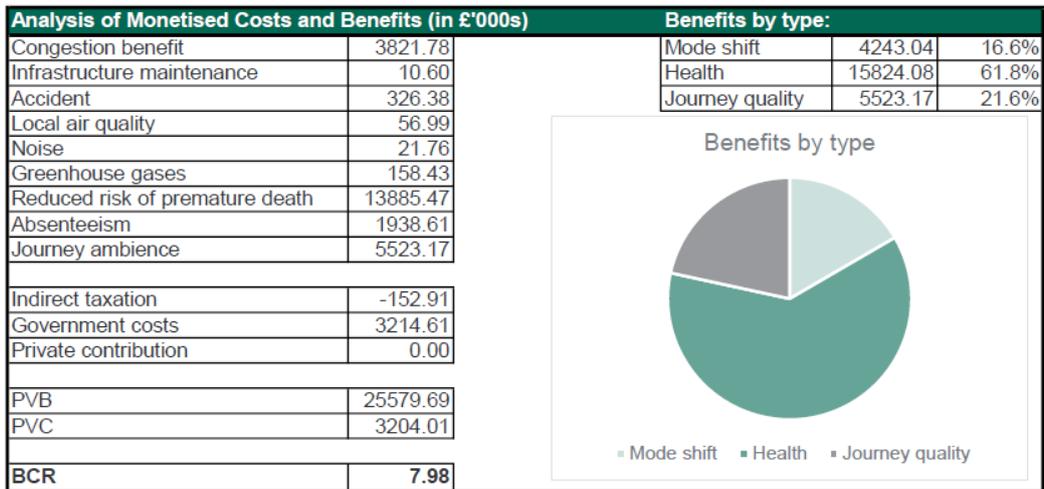
Objectives

1	Connectivity – improving the connectivity between Manchester and Sheffield through reduction in journey times and improved journey-time reliability
2	Environmental – avoiding unacceptable impacts on the natural environment and landscape in the Peak District National Park, and optimising environmental opportunities
3	Societal – improving air quality and reducing noise impacts, and addressing the levels of severance on the Trans-Pennine routes in urban areas
4	Capacity – reducing delays and queues that occur during peak hours and improving the performance of junctions on the routes
5	Resilience – improving the resilience of the routes through reductions in the number of incidents and reduction of their impacts
6	Safety – reductions in the number of accidents and reductions of their impacts

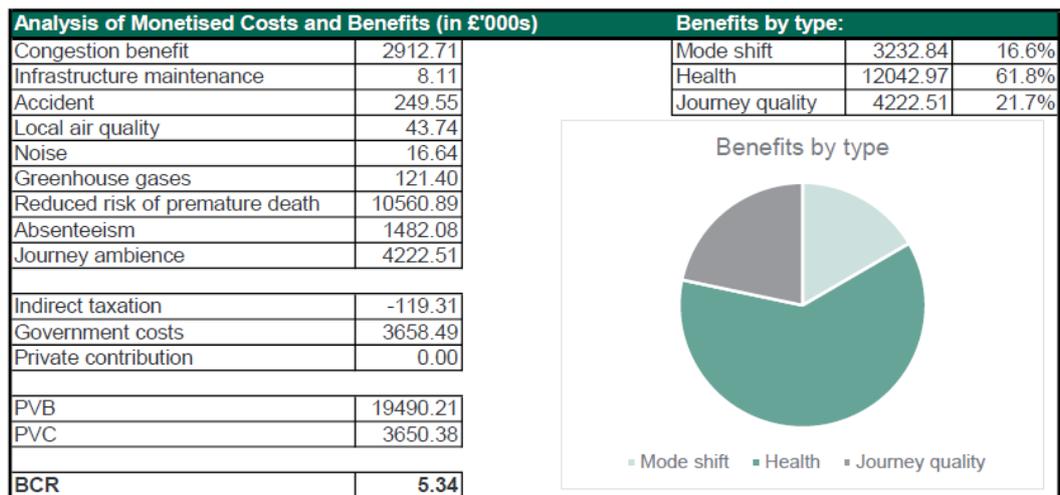
Annex 3

Output summaries for the DfT Active Mode Appraisal Toolkit (AMAT)

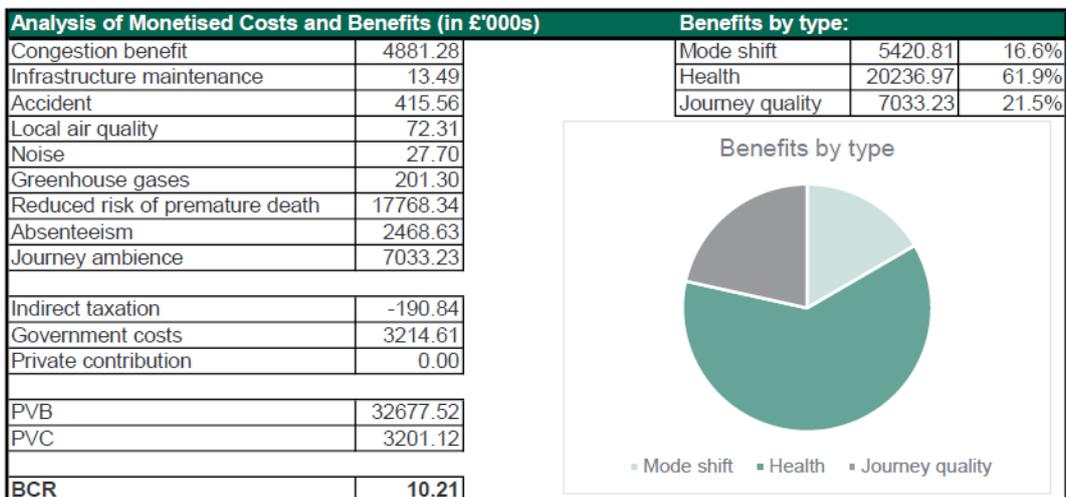
Central



Low



High



Example IMAT sheet

Submission number: 20

Date submission received by PINS: 11 November 2022

Name: Peter Simon

13.11.2022

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

By email to: [REDACTED]
[REDACTED]
[REDACTED]

National Infrastructure Planning - A57 Link Roads DCO Application - Peter Simon – A57L-001

Dear Secretary of State

As an A57 Link Roads Interested Party I recently endorsed the letter of 11th November to you from CPRE regarding the legitimacy of there being a response by Transport for Greater Manchester (TfGM) to your A57 Link Roads SOS Consultation 4. This query was on the basis that TfGM explicitly chose not to be an Interested Party at the Examination electing instead only to clarify points of agreement with National Highways through Statements of Common Ground.

As CPRE pointed out, the latest intervention of TfGM is a characteristically evasive approach to Examination in that it finally offers some evidence but submitted in a last minute way that negates right of reply. I do recognise of course that their views on all the Consultations (not just the last) were sought by the Secretary of State who might indeed have reasonably expected or assumed them to have an "interest". However such was not the case!

There was no visible advocacy by them at the Examination for their policies of Right Mix, Active Travel and the national one of Decarbonisation. In other words they explicitly chose not to be an Interested Party but rather to take a "hands off" approach participating only at the latest possible time away from scrutiny through a last minute Statement of Common Ground. Now their response to SOS Consultation 4 is of the same character seeking to sweep under the carpet all the significant issues of cumulative impact and policy compliance both by last minute submission and continual deferral.

As an Interested Party at both the "A57 Link Roads" and the "Places for Everyone" Examinations I doubt this is an acceptable approach from a relevant regional transport authority and feel it should be remedied. Therefore I fully support the implied request of a postponement of your Decision on the A57 Link Roads DCO Application as recommended to yourself by CPRE on the following grounds: *"Therefore, we believe that Interested Parties should reasonably be afforded the time and opportunity to consider any new documentation or material referred to by TfGM so as to be able to fairly answer to the claims of what would be a new Interested Party at the Examination (and Consultation)."*

This for the reasons given is also my position, and has my strong and further endorsement here.

Yours sincerely

Peter Simon