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**PEAK  
DISTRICT  
NATIONAL  
PARK**

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Letter sent via e-mail

TRANS-PENNINE UPGRADE

Your ref: Our ref:

Date: 23 March 2018

[Trans\\_Pennine\\_Scheme@highwaysengland.co.uk](mailto:Trans_Pennine_Scheme@highwaysengland.co.uk)

Dear Sir/Madam

**Trans Pennine Upgrade Public Consultation (February 2018)  
Response on behalf of the Peak District National Park Authority**

The Peak District National Park Authority welcomes the opportunity to provide comment on the Trans Pennine Upgrade Public Consultation. This document comprises a response on behalf of the Authority to that consultation, following consideration of the proposals at the National Park Authority meeting on 16 March. The response includes comments in relation to the following consultation documents:

1. Trans Pennine Upgrade Public Consultation – Share Your Views
2. Preliminary Environmental Information Report

The response also includes some background information about the National Park and its role, which will add some context to the comments provided.

Within the overall response there is a variable degree of detail provided within the comments, dependent upon the size and the complexity of the document being commented upon.

The Peak District National Park Authority recognises the severe impacts of traffic on the residents of Mottram Moor and Glossopdale and the wish to address these issues. However, whilst not objecting to the principle of addressing these issues, we do have some concerns regarding the wider impacts of the proposals on and within the National Park. Because of the lack of detail provided in support of the scheme, there has been very little information to allay these concerns.

**Therefore, until such information can be provided, this response should be viewed as a holding objection pending the provision of additional information and an opportunity for the Authority to assess any potential impacts of the scheme and to respond to Highways England.**

Our main focus is on the Preliminary Environmental Information Report. Our discussions with Highways England and their agents during the development of this scheme have focussed on the requirement for the timely provision of appropriate information. Therefore it is with some concern

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Member of National Parks UK

Holder of Council of Europe Diploma



Chief Executive: Sarah Fowler

Chair: Lesley Roberts Deputy Chair: David Chapman

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and frustration that we note the considerable lack of supporting information within this consultation; for example there is no clear traffic flow information. As the wider impacts of the scheme beyond the red line boundary relate to traffic flows and how they affect air quality, noise and vibration etc, it is impossible, to make an objective assessment of the effects of the scheme without this fundamental information.

We understand the reasoning behind the scheme: to improve conditions for residents within the Mottram Moor and Woolley Bridge areas. Unfortunately, the lack of information makes it impossible for the National Park Authority to support the proposed scheme in light of the potential impacts across the National Park and in particular within Tintwistle, and along the A628 and A57 corridors. The timely provision of such information, ahead of, or as part of the public consultation process (which should be an essential part of any such consultation), could have prevented such difficulties.

Therefore, we therefore request the timely provision of comprehensive and state-of-the-art traffic modelling, to provide the best available forecast for the traffic flows resulting from the delivery of the scheme. The roads of interest, for which we would wish to see traffic flow modelling include, but are not exclusive to the A57 Snake Pass, the A628(T) Woodhead Road, the A624 Hayfield Road and the A6024 Holme Moss Road. This modelling is essential to enable understanding of the wider effects of the scheme on and within the National Park. As a measure to calibrate the modelling we would wish to see the inclusion of a means to assess real-time traffic flows both before and after completion of the scheme. This would require close cooperation with the highway authorities neighbouring the scheme, in this case Tameside, Derbyshire, Kirklees and Barnsley.

### **Background information on the Peak District National Park**

The Peak District National Park was the first of the UK's National Parks to be designated, in 1951. The Peak District National Park Authority has two statutory purposes as set out in the National Parks and Access to the Countryside Act (1949) and restated within Section 61 of the Environment Act (1995). These purposes are:

- i) To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park, and
- ii) To promote opportunities for the understanding and enjoyment of the special qualities of the National Park.

The two purposes have equal weight, except in cases where there is conflict between them. Should this occur, then the first purpose takes precedence. The Environment Act also places a statutory duty on National Park Authorities that in pursuance of their purposes, they should seek to foster the economic and social well-being of communities within the National Park.

In addition to the purposes and duty relating to National Park Authorities, Section 62 of the Environment Act (1995) places a statutory duty on bodies undertaking work affecting land within a National Park to have regard to National Park purposes. In the context of any work affecting land within the Peak District National Park, this duty applies to Highways England and any of its partners or agents.

Although our statutory roles are effective within the National Park Boundary, we have a bona fide interest in the surrounding area for a number of reasons that are pertinent to our consideration of the scheme. The National Park's Biodiversity Action Plan (BAP), which the NPA supports, covers an area that embraces the Dark Peak (51), South West Peak (53) and White Peak (52) National



Character Areas (as set out in the published Natural England Documents). These are rounded off in the Glossop area and elsewhere to form a more coherent boundary. The eastern end of the HE scheme lies within this BAP area. The main habitats and the species they support are included in the BAP, so rivers, woodland, ponds, grasslands and other habitats and species, particularly where these form part of Peak District populations, are deemed particularly important.

Furthermore, the NPA recognises that wildlife populations do not follow political boundaries, so species adjacent to the Park boundary may also be part of National Park's populations. This would apply particularly to birds such as lapwing, golden plover and curlew that utilise lowland grasslands before settling on upland territories. These lowland grasslands are critical to their survival and the National Park Authority is particularly concerned about the reductions in populations of some of these iconic species. Likewise, bats found in the scheme area are likely to be part of the National Park's hibernating populations in caves and other underground features, and otters which are just returning to the National Park and travel far and wide, will be part of the National Park population.

### **Trans Pennine Upgrade Public Consultation – Share Your Views (February 2018)**

The 'Trans Pennine Upgrade Public Consultation – Share Your Views' brochure is effectively the main document that will be viewed by members of the public, and as such offers a summary of the proposals. In addition, the brochure provides details on some of the minor proposed amendments outside of the Development Consent Order process and invites public comment on them. The following response is based upon detailed comments and observations with regard to the 'Trans Pennine Upgrade Public Consultation – Share Your Views' brochure.

#### **Page 4 – Why is the scheme needed?**

The Peak District National Park Authority recognises the reasons for the proposed scheme, in particular in relation to the issues of air quality, noise and severance experienced by residents of Mottram Moor and Glossopdale. We also recognise that the scheme is being delivered outside the boundary of the National Park, although as described above, it does impinge in the Peak District BAP area of interest

It is noted that under the Environment objective, there is a commitment to design the scheme "to avoid the unacceptable impacts on the natural environment and landscape in the Peak District National Park". This undertaking is welcomed; however it should be noted that due to the lack of available information with regard to traffic flows, it is impossible to assess the wider impacts of the scheme on and within the National Park, or understand how 'unacceptable impacts' could be effectively mitigated. In order to be assured that this objective is being met, we expect to see a thorough assessment of the impacts of the proposed scheme on the National Park.

This should include full disclosure of traffic flow data and how this affects land within the National Park, including the habitats and species subject to the South Pennine Moors Special Area of Conservation (SAC), Peak District Moors Special Protection Area (SPA), and Dark Peak Site of Special Scientific Interest (SSSI). We would also wish to see an assessment of the impacts of the scheme on non-motorised users within the National Park, and in particular users of the Pennine Way, Pennine Bridleway and Trans-Pennine Trail, including at crossing points.

#### **Page 6 – Facilities for cyclists, pedestrians, equestrians and walkers**

We are pleased to see the intention to provide improved facilities, for example a combined cycleway and footpath within the scheme. It is suggested that the aim should be to provide high quality sustainable travel facilities that encourage modal shift of travel behaviour, as an integral part of the



upgrade. Where possible, the delivery of segregated facilities proves most effective in encouraging new walking and cycling trips.

The consultation documents include a plan titled 'Route Map 2'. This plan shows the proposed route of the A57 Link Road causing the severance of a Right of Way which is part of the Tameside Trail, the Etherow Goyt Valley Way and the interim route of the Pennine Bridleway (National Trail) for walkers. The plan proposes a lengthy and inconvenient diversionary route and infers an un-signalised road crossing. If so, this is a disappointing approach and contrary to the intention to provide improved facilities. We suggest these aspects should be re-examined. A separate detailed plan(s) showing all of the proposed facilities for pedestrians, cyclists and equestrians would have been helpful. The details provided so far have been difficult to assess.

We would expect design considerations regarding the severance of Trails to be developed in conjunction with the appropriate Trail bodies, to provide high quality enhancement and the safe segregation of the Trail and its users from the new road network (including during construction).

The upgrade and promotion of the local sections of the Pennine Bridleway and Trans-Pennine Trail would help to give the communities of Mottram, Hollingworth and Glossopdale a renewed sense of advantage from their close proximity and onward connection to the Peak District National Park.

### **Benefits and impacts of the link roads (Page 8)**

The section on 'Cultural Heritage' states; "*Whilst there is potential for negative impact on the environmental setting of St. Michael and All Angels Church (Mottram) and Melandra Roman Fort, the reduction in traffic through the Mottram in Longendale Conservation Area will improve the appearance and appreciation of the village and its architectural quality.*" However, there is no acknowledgement of the impact on those areas / heritage assets where traffic flow will be increased across the wider Peak District and within the Tintwistle and Langsett Conservation Areas.

### **Page 9 – Safety and Technology improvements**

Although these elements do not form part of the Development Consent Order process, we welcome the opportunity to consult on these additional proposals for Safety and Technology improvements along the A628.

The proposals are for a package of measures, including highly reflective road markings, skid resistant surfaces and automated snow gates. Their location would be within, or close to, the boundary of the Peak District National Park. The design and siting of the safety and technology improvements will be of critical importance, given their potential to impact upon the setting of the National Park and its special qualities. Therefore we would expect Highways England and their agents to consult with the National Park Authority prior to installation. This would enable an assessment of and, if required, mitigation of visual impact.

The measures proposed by Highways England would be covered by the General Permitted Development Order; however for works within the boundary of the Peak District National Park, Highways England (and those acting on their behalf) is subject to a Statutory Duty under Section 62 of the Environment Act (1995) to have regard to National Park purposes as detailed above.

There is reference to the Dog and Partridge right turning scheme. There is potential for this proposed work to impact on a Grade II listed milepost (LEN 1151084), the setting of another listed building (LEN 1191620) and the wider open (historic) landscape. This would potentially lead to a negative impact on the historic environment. We would expect these potential effects to be assessed and for appropriate solutions to be applied.



## Preliminary Environmental Information Report (February 2018)

### Introduction

This document constitutes a response on behalf of the Peak District National Park Authority to the Trans Pennine Upgrade Programme's Preliminary Environmental Information Report. The response is comprised of two sections; the first is of general comments, whilst the second contains detailed comments on the report.

### General Comments

The report builds on the approach detailed within the Environmental Impact Report Scoping Request of November 2017. The Peak District National Park Authority provided comment on this Scoping Request and is pleased to see that some of our comments have been used in the preparation of this Preliminary Environmental Information Report.

However, we are extremely disappointed and concerned with the lack of detail provided at this stage of the process. Whilst the scheme itself falls outside the boundary of the National Park, the general acceptance is that it will lead to a quite significant increase in traffic flows along some National Park roads. These include, but are not exclusive to, the A628(T), the A57 Snake Pass and the A6024 Holme Moss Road. Whilst we have been involved in discussions with Highways England and Arcadis in relation to traffic modelling, the lack of traffic model data within the Preliminary Environmental Information Report makes it impossible to fully assess both the benefits and impacts of the scheme. Given that the public consultation offers a last opportunity for the public, statutory bodies and others to respond to the proposed scheme, this lack of information is unacceptable.

Similarly, there appears to be a lack of understanding within the report as to the potential extent of the impact of traffic growth along the A628 corridor. For example, the scheme is likely to impact on traffic along the A6024, extending into Kirklees. However, it is unclear as to whether discussions regarding this impact have taken place with Kirklees Council. There also appears to be a lack of regard to the potential impacts on settlements such as Tintwistle and Langsett as a result of the scheme. Both of these villages either fall within or border the National Park, and both have issues in relation to air quality, noise and severance. Langsett Parish Council has written to the national Park Authority to express its concerns.

The impression given is that the tight timescales involved with meeting the RIS1 deadline of March 2020 have meant that the public consultation is being held before all of the relevant environmental assessment has been undertaken. Where the potential impacts extend within the National Park and affect communities already adversely impacted on by traffic, this appears to be a short-sighted approach if the support of these communities is being sought.

Given the considerable hindrance of commenting on these proposals without the full provision of data, we seek assurance from Highways England that the Authority will be given the opportunity to comment further on these proposals, once accurate data can be made available, regarding the levels of traffic growth resulting from the scheme. This will need to be coupled with a realistic assessment of the resulting benefits and impacts of the scheme and this change in traffic flows on the National Park.

### Detailed Comments



## **Chapter 2 – The Scheme**

### **2.1 Background to the scheme**

**Paragraph 2.1.2 (Page 4)** refers to the postponement of the ‘A628 Climbing Lanes’ scheme to allow further consideration of the benefits associated with them. It is worth noting that the Peak District National Park Authority formally objected to the ‘A628 Climbing Lanes’ scheme in April 2017. The basis of this objection centred upon the impacts of the scheme on the National Park, including particularly sensitive landscape and habitat designations. The objection was also in reference to the apparent piecemeal approach to bringing forward proposals for the whole corridor rather than taking a holistic approach. Whilst not wishing to pre-judge any future decision by the Authority, it is likely that any reintroduction of the climbing lanes proposal would be met with a similar response.

We would wish to emphasise that in bringing forward any further proposals for climbing lanes on the A628, attention should be given not only to their impact on the National Park, but their fit with the more strategic approach to the whole corridor being brought forward by Transport for the North.

### **2.2 Scheme objectives**

**Paragraph 2.2.1 (Page 5)** suggests that “*the scheme is also being designed to avoid unacceptable impacts on the natural environment and landscape in the Peak District National Park*”. We welcome this statement, and look forward to working with Highways England to address some of the concerns expressed within this document. However, as noted above, in order to be assured that this objective is being met, we will expect to see a thorough assessment of the impacts of the proposed scheme on the National Park.

This should include full disclosure of traffic flow data and how this affects land within the National Park, including the habitats and species subject to the South Pennine Moors Special Area of Conservation (SAC), Peak District Moors Special Protection Area (SPA), and Dark Peak Site of Special Scientific Interest (SSSI). We would also wish to see an assessment of the impacts of the scheme on non-motorised users within the National Park, and in particular users of the Pennine Way, Pennine Bridleway and Trans-Pennine Trail, including at crossing points.

Given the more limited nature of the proposed scheme, in relation to previous proposals, it is likely that there will be a call for further road improvements along this corridor. We are aware that Highways England are currently looking at the next phase, a continuation of the scheme to provide a bypass of Hollingworth and Tintwistle. It is also clear from the report that some consideration is still being given to the ‘A628 Climbing Lanes’ scheme. Both projects would involve road building within the National Park, and in the case of the latter within land covered by British and European protective designations of the highest order. Any consideration of such works should be in adherence to the objective above. As such it is important to understand that avoiding an “unacceptable impact” in this context represents the highest bar in terms of design and should involve enhancement as well as mitigation both in terms of landscape quality, nature conservation value and the ability of the public to enjoy these areas.

### **2.8 Highways lighting**

**Paragraph 2.8.2 (Page 9)** refers to the approach of minimising light pollution and taking account of landscape and ecological effects; this approach is supported. The neighbouring high ground of the National Park offers opportunities for the enjoyment of dark skies, albeit within the effects of the A628 Trunk Road and the light glare of Greater Manchester. Any efforts to reduce and mitigate



further impact are welcomed. We would be looking for an overall reduction in light pollution in any scheme as this is a feature that is not restricted to National Park boundaries and one which we have identified as one of the Park's special qualities (National Park Management Plan).

## 2.16 Environmental design

**Paragraph 2.16.2 (Page 12)** refers to the use of earth mounding or acoustic fencing to provide screening from increased noise levels resulting from the scheme. If this approach is taken, consideration must be given to ensuring natural-looking landforms, in keeping with the existing setting, in views not only from the surrounding areas but also from the higher hilltops nearby which would be looking down on any such mounding. It should also be noted that earth mounding takes up more space, whilst the objective stated (Table 2-4 under biodiversity) is to minimise the land take for the scheme. Where planting is proposed, this should utilise appropriate and locally sourced appropriate species of trees and shrubs designed to form new woodland that would link with others in the vicinity (in line with the objective to reduce habitat fragmentation that the scheme would inevitably cause). However, we consider it premature to attempt to choose species that might be better adapted to future climates owing to lack of detail on what we might expect.

Paragraph 2.16.3 (Page 12) refers to the landscaping strategy aiming to maintain local vegetation patterns and landform, but we note that the main areas are agricultural grassland, including some acid and marshy grassland patches. We consider it important to re-instate these, as well as new hedges, ditches and trees, so as to re-establish the range of local habitat patterns and linkages that are likely to have links with habitats and species within the National Park and its BAP area.

Paragraph 2.16.4 (page 12) includes measures to control water pollution into the nearby rivers and streams, but we note that it does not mention (and nor does the chapter on Hydrology) any measures to polish the discharge water into the local water courses. The National Park Authority would expect the highest standards of water quality in the discharge so as not to compromise the efforts being made to enhance the local rivers under the Water Framework Directive and the BAP, especially the River Etherow, the headwaters of which flow out from the National Park. The discharges should therefore be cleaner than those of the receiving waters to secure these improvements. Although drainage design to ensure no detrimental effects is listed in Table 2-4 under Road Drainage, there is no detail. We would expect the adoption of Sustainable Urban Drainage Systems (or their equivalent) using native species should be added to all balancing ponds, which themselves should be designed to be more in keeping with the landscape and to help form better habitats at the same time.

Paragraph 2.16.6 and Table 2-4 under Biodiversity state that the design of road schemes seek to reduce impacts on the environment by reducing habitat fragmentation and enhancing biodiversity value. We support this approach, but have doubts as to whether in this case it is feasible. The scheme would appear to add significantly to the fragmentation in the area owing to a considerable increase in road density in a small area, which would increase fragmentation considerably. Reducing such fragmentation on each side of the roads without the means of moving across them would constitute a major barrier to less mobile species and would deter those that are not tolerant of high levels of disturbance – which includes some of the very bird species listed in Chapter 7, which are nationally declining and which form part of the National Park regional population such as lapwing.

The scheme has the potential to have a visual impact from within the National Park. Where artificial earthworks or screening are proposed consideration of this visual impact should be considered in support of the Environment objective referred to within Paragraph 2.2.1.



**Table 2-4 Biodiversity (Page 14)** refers to the following Design Measure/Consideration:

*“Landscape planting would be designed to avoid providing food sources away from the edge of the road and, as a result, prevent traffic collisions”*

It is unclear what is meant by this, but the assumption would be that food sources would be better away from the edge of the road than nearer to it? However, this could be impossible to achieve since any habitat created on road verges and banks such as scrub, woodland or grassland, attracts a number of invertebrates, small mammals and birds, which may also act as food for predators. Avoiding food sources close to the road effectively means concreting the banks which does not fit into other objectives.

It also states that replacement planting would be provided for habitat losses, but since planting usually refers to trees and shrubs, and the major loss of habitat is grassland, we would recommend that new grasslands to replace those lost should be established, but the success of this cannot be guaranteed.

It also states that the proposed bridge crossing of the Etherow River would maintain connectivity for wildlife, which we expect to include maintaining a natural bed and banks to the river and its invert level in order to maintain the water as a riverine habitat for invertebrates and other aquatic species.

## **Chapter 3 – Assessment of Alternatives**

### **3.2 Reasonable alternatives studied**

**Paragraph 3.2.11 (Page 20)**, the third bullet point references the benefits to the residents of Mottram, with regard to air quality, noise and severance. However, the traffic modelling provided thus far suggests traffic increases along the A628 through Hollingworth and Tintwistle. This is not acknowledged within this part of the report, so perhaps it should be. As this may include the worsening of air quality within an area likely to be covered by a future Air Quality Management Area, it is pertinent to do so.

It would assist the National Park Authority if the criteria used to discard previous schemes could be shared with us, so that we can understand better why different schemes have been discarded. We would wish to ensure that the potential effects on the National Park in terms particularly of effects of noise, air pollution and the deterioration of tranquillity on a mixture of receptors had been adequately take into account.

We would welcome some discussion on any alternative scheme that might solve key problems without impacting the National Park interests.

## **Chapter 4 – Environmental Assessment Methodology**

**Table 4-1 (Pages 26 and 27)** refers to five Public Consultation Events from Saturday 18<sup>th</sup> March to Saturday 1<sup>st</sup> April; however, no year is given. It is assumed that these were the events from 2017.

## **Chapter 5 – Air Quality**





## 5.1 Existing environmental conditions

**Paragraph 5.1.6 and Table 5-1 (Pages 30 to 32)** provides the detail of the location of sensitive receptors to Air Quality. The table does not contain any sensitive receptors located within the Peak District village of Tintwistle. Whilst this report does not contain any traffic modelling figures, thus making it difficult to easily assess future impact, it is extremely likely that the scheme will increase traffic flows along the A628 through Tintwistle. The modelling data that has been provided so far in discussions with Highways England and Arcadis would suggest an increase in the average traffic flows along the A628 through Tintwistle, equating to an additional 1,280 vehicles per day<sup>1</sup>. This model suggests that the proportion of HGV traffic will remain the same, effectively an increase in HGV numbers overall. Whilst there may be freer-flowing conditions through the village as a result of the scheme, it is our understanding that much of the air quality impacts within the village are as a result of low gear running of HGVs either climbing eastwards or braking during descent westwards.

It is important that the full impacts of the scheme both positive and negative for the wider area are fully understood. The inclusion of sensitive receptors within the village of Tintwistle, including the school and its grounds, and an appropriate assessment of air quality impacts should be included are imperative.

Similarly, the A57 Snake Pass is expected to see a 27% increase in traffic, equating to an additional 1,220 vehicles per day. There are currently three sensitive receptors located within the National Park along this route (R52, R53 and R54). The inclusion of these receptors is acknowledged and welcomed. However we would suggest the inclusion of other roadside receptors would be appropriate, including the Snake Pass Inn and Ladybower Inn. Both of these premises are in close proximity to the road and have seating areas facing the road.

**Paragraph 5.1.7 (Page 32)**; the inclusion of the ecological receptors; South Pennine Moors Special Area of Conservation (SAC); Peak District Moors Special Protection Area (SPA); and Dark Peak Site of Special Scientific Interest (SSSI) is welcomed, but other ecological receptors should include the woodlands along the scheme which can suffer from NOx deposition effects. The modelling data that has been provided so far in discussions with Highways England and Arcadis would suggest the average traffic flows would increase by approximately 1,220 vehicles per day along those parts of the A628 and A57 covered by these designations. Therefore, it is important that consideration of air quality impacts on them covers the same area. This would constitute the A628 and A57 corridors through the National Park. Because the traffic modelling information that has been supplied thus far indicates a significant increase in percentage traffic flows on the A6024 Holme Moss road, this road should also be considered in relation to traffic related air quality assessment.

The National Park Authority is particularly concerned about the potential for air pollution effects in terms especially of NOx deposition on the SAC and SSSI features. The National Park Authority has championed multi-million pound projects through the Moors for the Future partnership over the last 15 years to restore the highly damaged peat in the National Park and its neighbouring hills. The land within the South Pennine Moors SAC has been a particular focus. Restoring blanket bog vegetation including a cover of Sphagnum bog mosses has been a key objective to enhance biodiversity, reduce carbon loss in eroded peat and further future carbon sequestration, to improve water quality and to reduce downstream flooding. The bog mosses which are an essential part of this restoration are very sensitive to NOx deposition, so it is imperative that there are no additional sources of air pollution that might threaten the success of these restoration projects.

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<sup>1</sup> We understand that this figure is based on an Annual Average Daily Total Fixed Demand flow provided by Arcadis in January 2018.



The predicted increase in traffic flows on the A6024, would suggest an origin / destination in West Yorkshire. It is therefore important that Kirklees Council should be consulted in relation to the proposed scheme.

Because of the predicted increase in flows along both the A628 and the A6024, egress from the junction of the two roads (already problematic), is likely to be worsened. This may result in queueing traffic at peak times. The constricted nature of the A6024 at this location could lead to pollutant build-up here.

**Paragraph 5.1.8 (Page 32)** makes the observation that the air quality impacts of the scheme on the ecological receptors will be fully assessed for the Environmental Statement. The problem with this approach is that currently, a number of statutory bodies including the Peak District National Park Authority are being asked to comment on the proposed scheme. In order to do so, we need a clear indication of potential impacts on the National Park, including air quality impacts on these sensitive receptors. The delay in providing this information until the final Environmental Statement is an impediment to the Authority in undertaking this work in a considered and timely manner. As this public consultation offers the final opportunity to comment on the proposals and their impacts, the Authority and other bodies are trying to assess the impacts without having access to the necessary information. This may lead to negative impacts that are missed within our response to the proposed scheme.

### 5.3 Potential effects and mitigation measures

**Paragraph 5.3.4 (Page 34);** the hyperlinks to the Interim Advice Notes provided with the four bullet points do not appear to work.

**Paragraph 5.3.7 (Page 34)** refers to the revision of traffic flow data. The caution with regard to the release of traffic flow data is understood. However, it is unreasonable to expect members of the public and statutory bodies to assess the possible benefits and impacts of a road scheme without the provision of the traffic flow data used to inform the development of the Preliminary Environmental Report. As indicated above, the Public Consultation phase offers the final opportunity to influence the design of the scheme and opportunities for mitigation. Doing so without having the appropriate information devalues the consultation process.

Figure 5.4 is referred to within this paragraph as showing the Affected Road Network in relation to Air Quality. There appears to be a significant gap, in that the A628 across the National Park is not included. As the modelled data, which the Authority has been privy to, thus far indicates an increase in traffic of 1,280 vehicles AADT including an increase of 152 HGVs per day, this road should be included. The road passes through the South Pennine Moors Special Area of Conservation (SAC); Peak District Moors Special Protection Area (SPA); and Dark Peak Site of Special Scientific Interest (SSSI). An assessment of impact on these designated areas is imperative.

It should be noted that Table 7-1 (Chapter 7 Biodiversity) suggest a possible negative impact on the designated sites as a result of the deterioration in air quality and associated nitrate deposition. A full appraisal of this impact should be made. The provision of full information relating to this impact should have been made available as part of the public consultation, if meaningful comment is to be provided.

Similarly, it is anticipated that the increased cross-park flows will have an impact on traffic flows on the A616 Trunk Road. Langsett village which lies on the boundary of the National Park is already



within an Air Quality Management Area. An assessment of air quality impacts resulting from the scheme at this location should form part of the Environmental Statement despite the distance of Langsett from Mottram, because it forms part of the same Southern Pennines Strategic Road Network route.

**Paragraph 5.3.9 (Page 37)**, refers to the positive impacts of the scheme in regard to Receptors R24, R25 and R26. This benefit is acknowledged as being important to the residents / users of these Receptors. Presumably the measure of benefit is also subject to potential changes to the traffic model data, and may increase or decrease as a result?

**Paragraph 5.3.13 (Page 37)** refers to the predicted lack of exceedances of the AQS objective within the Do Something scenario thus far. Whilst this is positive, the lack of detailed information referred to above suggests that the impacts of the proposed scheme beyond the immediate study area is either not understood or not yet within the public domain. In either case it is difficult for consultees to properly judge or comment on the potential impacts and / or benefits of the scheme.

## **Chapter 6 – Cultural Heritage**

**Sections 6.1 to 6.3 and Figures, 6.1 to 6.4 inclusive (Pages 38 to 40)** discuss Cultural Heritage constraints and mitigation. However, these sections refer primarily to the immediate area around the proposed scheme. There is little reference to areas that could potentially be impacted by an increase in traffic volume in the wider road network. The areas that could be affected include the following: -

### **Conservation Areas**

The Tintwistle Conservation Area – designated 21st January 1977 and a character appraisal adopted 12th March 2010 and Langsett Conservation Area – designated 7th July 1995 and a character appraisal adopted on 7th July 1995. There is the potential for the expected increase in traffic to negatively impact both of these Conservation Areas and their setting, including views into and out of the Conservation Areas.

### **Listed Buildings:**

- a) Sunday School and boundary wall, Tintwistle (LEN 1203897);
- b) The Old Workhouse, 7 Stocks, Tintwistle (LEN 1087997);
- c) Former Ebenezer Chapel, Tintwistle (LEN 1203918);
- d) Church of St. James (Crowden), Tintwistle (LEN 1203925);
- e) Valve Station to west of Bleak House, (Crowden), Tintwistle (LEN 1087998);
- f) Bleak House, including wall and railings at Bleak House, (Crowden), Tintwistle (LEN 1334810);
- g) Milepost approximately 1000m east of junction with Windleden Lane, (LEN 1315029);
- h) Milestone approximately 150m east of Dog and Partridge Public House (LEN 1151084);
- i) Bordhill Lodge (Ellaeslie Lodge), Woodhead Road (LEN 1191620); and
- j) Langsett Barn (Barn at Langsett House) (LEN 1191611).

### **Wider context:**

- k) Crowden Bridge 200 yards north-west to Crowden Old Vicarage (LEN 1203942);
- l) Milestone approximately 400m east of Lady Cross on Old Salt Road (LEN 1151102);
- m) Lady Cross, approximately 1000m south-west of junction with Windleden Lane on Old Salt Road (LEN 1151101);
- n) Milestone approximately 200m west of Flouch Inn, Woodhead Road (LEN 1151083);



- o) Milestone approximately 300m north of Flouch Inn, Whams Road (LEN 1315028);
- p) Langsett House (south part), Langsett (LEN 1315060); and
- q) The Farm House, Langsett (House immediately east of Langsett House)(LEN 1151082).

There is also the potential for Heritage assets along the A57 Snake Pass to be affected by the forecast increase in traffic flows.

We would wish to see an acknowledgement of this potential impact and the consideration of mitigation of it within the final Environmental Statement

## 6.2 Other baseline information to be obtained / surveys to be undertaken

**Paragraph 6.2.5 (Page 39)**, we welcome the commitment to consult with the Peak District National Park Authority as a key stakeholder.

## 6.3 Potential effects and mitigation measures

**Table 6-1, (Page 42)**, refers to the assessment of Tintwistle Conservation Area (CA3). It is stated that it is considered that there would be no impact of the operation of the scheme on this asset. Whilst this statement is reassuring the obvious lack of data with regard to traffic flows, vehicle emissions and noise makes it difficult for this Authority to judge how accurate this statement may be. Because this public consultation offers a final opportunity to comment on the impacts of the scheme on the Tintwistle Conservation Area, the Authority's ability to assess impact is somewhat compromised.

## Chapter 7 – Biodiversity

### General

We are mindful that none of the actual physical works involved in the construction of the proposed highway will fall within the National Park boundary, although, as we have pointed out, we have a bona fide interest in the area that our BAP covers as well as a regional perspective on species that might also be part of the larger Peak District assemblage. There are, however, likely cumulative effects impacting on the National Park caused by the predicted increase in traffic along the A628, A57 (Snake Pass) and the A6024 (Holme Moss Road) within the National Park.

As identified in the previous response to the EIA Scoping Report, all three of these roads are within designated sites (Dark Peak SSSI, South Pennine Moors Special Area of Conservation and the Peak District Moors Special Protection Area). The nature of these effects, during construction and operation has been identified for these sites in the Preliminary Report, along with the duration of the effect and additional mitigation.

The impacts identified in Chapter 7 (Biodiversity) need cross-referencing with the Chapters on Air Quality (Chapter 5) and Noise and Vibration (Chapter 10). Similarly, the A57 and A6024 need highlighting in Figure 5.4 Air Quality Affected Road Network.

### 7.1 Existing environmental conditions

**Paragraph 7.1.18 (Page 46)**; notes that whilst the scheme falls within the Impact Risk Zones (IRZs) for the Dark Peak SSSI, the IRZ does not list transport proposals (including roads) as a potential



impact at this distance. We feel that this development still poses a risk due to the increased traffic as mentioned above, which is likely to lead to the following residual effects: -

- Impact on the South Pennine Moors Special Area of Conservation and Dark Peak SSSI through the increased deposition of atmospheric pollutants (principally Nitrogen). The principal sensitive features to this deposition are likely to be Blanket Bog; Upland Heath; and Upland Flushes/Mires
- Impact on Peak District Moors Special Protection Area, Dark Peak SSSI, in particular breeding / ground nesting moorland birds; and Species of Principal Importance for Conservation under S41 of the Natural Environment & Rural Communities Act 2006 (in particular Mountain Hare) through increased visual and noise disturbance and road kill.

Whilst the Dark Peak SSSI, South Pennine Moors Special Area of Conservation and the Peak District Moors Special Protection Area have been considered within this preliminary report, the effects on receptors relating to the designations have not. For clarification these are: -

- Blanket Bog,
- Upland Heath
- Upland flushes / mires
- Moorland birds, including SPA species (peregrine falcon, short eared owl, merlin, and golden plover). Other moorland species that should be considered are curlew, red grouse, waders like lapwing and dunlin, and ring ouzel.
- Mountain Hare

**7.1.29 (page 48)** describes the breeding bird survey results briefly, but neglects to consider the importance of lowland grassland as pre-breeding sites before birds (especially waders) move to the uplands in the National Park to breed, but also the importance of such grasslands for these breeding moorland birds that return to lower fields to feed whilst nesting on higher ground. This could be particularly important in this area and merits investigation.

7.1.42 page 50 includes a list of surveys that have been scoped out. The National Park Authority agrees with most of this list, but we consider that aquatic invertebrate surveys are essential in all the streams as indicators of water quality (rather than being only interested in notable species). These then act as bio-indicators post construction, if the scheme progresses, to demonstrate water quality improvements.

It is also noted in the same list that terrestrial invertebrates have been scoped out. We consider selected surveys (e.g. of butterflies and day flying moths, bumble bees and hoverflies) to be good bio-indicators to demonstrate enhanced habitat quality post construction if the scheme were to progress. An evidence-base is needed to demonstrate enhanced habitat area and quality as stated as an objective.

Similarly, we regard the statement that aquatic invertebrate sampling is not warranted in Hurst Clough Wood, on account of the wood being important only as an ancient site, to be short-sighted as the river and its quality will be of integral importance to the wildlife in it as well as it being a bio-indicator for water quality as set out above.

In addition, fungi have not been included in the species to be surveyed. Since we have noted in the National Park that waxcaps and associated groups are found mostly in acid grassland sites where



there is often little of other botanical interest, we would expect these groups to be surveyed in the remnant semi-natural grasslands on the scheme landtake.

It is noted in the last of the bullet points on page 51 that mitigation measures for species like hedgehogs and brown hares would avoid effects. We would point out that the road would provide a major barrier to these species which is not likely to be overcome by the provision of access tunnels. We will be interested to see what other mitigation can be incorporated.

### **7.3 Potential effects and mitigation measures**

**Table 7-1 (Pages 51 to 53)** provides an assessment of the potential impacts of the scheme during construction and operation. The recognition that the scheme may have an impact is welcomed. However, as with other previous comments, the lack of detail available makes it impossible for the National Park Authority to properly judge the impacts of the scheme before providing comment upon it.

Given the importance of these designations, asking the Authority to comment on a scheme where the details of impacts are unknown, un-modelled or simply as yet unavailable is unreasonable. If the intention is to work with the Authority and others to address any impacts, the full detail should be available, so that we are able to make a considered judgement of impacts and benefits.

In addition, the mitigation section of Table 7-1 provides no clear commitment to completing the Habitats Regulations Assessment and associated mitigation. Given that the development is not associated with the management of the designations and that the Report recognises the development may impact upon the designations a HRA will be required. The National Park Authority regards the preparation of such an HRA to be essential. We would therefore expect the HRA to be provided in the final Environmental Statement to give a clear steer for the mitigation required and the likely effectiveness of it. Also, the potential effects on non-qualifying species associated within the SSSI (e.g. Section 41 species mountain hare) are identified during construction and operational phases, but there is no mitigation relating to these at either phase. This information needs to be provided in the Environmental Statement.

We are concerned that the efficacy and scope of possible mitigation that is stated would be included in an HRA (Table 7-1) would indeed have little effect on the special features of the important sites. The only way of reducing nitrogen deposition is to reduce the sources, which effectively means reducing traffic, at the same time, contributing to the Climate Change targets. We will be interested to work with you to develop more innovative solutions to this issue.

## **Chapter 8 – Landscape and Townscape**

### **8.2 Other baseline information to be obtained / surveys to be undertaken**

**Paragraph 8.2.1 (Page 67)** refers to consultation with statutory consultees to agree / select representative viewpoints for consideration. Because of the potential visual impacts of the scheme on views from within the National Park boundary, it is imperative that the Authority is provided with the opportunity to participate in this approach.

### **8.3 Potential effects and mitigation measures**

#### **Table 8-3 (Pages 68 to 81)**



**Environmental design;** the provision of mounding / fencing / planting may not be appropriate in relation to the landscape character of the area, both at National and local level. The Mitigation proposals need to look at surrounding landscapes and how proposed mitigation can tie into existing features. If planting is an option, it should be noted that the length of time of maturation of trees means that the mitigation affects are delayed. Therefore we would recommend that off-site planting commences prior to construction. We would suggest that early off-site planting of young trees may result in stronger growing specimen trees than planting semi-mature trees.

At present, there are no viewpoints from any of the national trails or the National Park. We would strongly advocate their inclusion, particularly from viewpoints within the National Park towards the scheme and from viewpoints down onto crossings of the A57 Snake Pass and A628 (T) from the Pennine Way, Pennine Bridleway and Trans Pennine Trail. Views onto the cross-Peak District routes from open access lands, tracks and paths in the vicinity of roads where significantly more traffic is expected should also be included.

There is a possible impact on the setting of the National Park through the loss of trees associated with the scheme, and subsequent visual intrusion of the new roads and roundabouts, including light pollution. The forecast increase in traffic on the A57 Snake Pass, A628 (T), A624 and A6028 would also result in visual intrusion: we would wish to see acknowledgement of this impact.

## **Chapter 9 – People and Communities**

### **9.1 Existing environmental conditions**

**Paragraph 9.1.1 (Page 82)** refers to Figure 9.1, which delineates the Study Area for Mottram in Longdendale (including the Mottram Conservation Area), Hollingworth and other local communities. The Upgrade is being proposed due to current road traffic density having a wide and very significant negative effect on everyday life for these communities. We consider the high relevance of the People and Communities factors necessitates the study area to be taken wider than 500m.

Induced traffic flows from operation of the Scheme could amplify the current adverse effects from traffic travelling through Glossop and Tintwistle, including the Tintwistle Conservation Area. The close proximity of Glossop and Tintwistle compels the need to include them in measures to mitigate the predicted transference of traffic, noise, air quality and severance issues to these communities.

**Paragraph 9.1.3 (Page 82);** the Community Facilities and Commercial Assets that are included on Figure 9.1 include Schools; Churches; Doctor's Surgeries; Health Centres; Mottram Agricultural Showground; commercial assets. It is suggested this should be expanded to include Post Offices; Parks/Playgrounds; food shops.

**Paragraph 9.1.9 (Page 82);** within the 'Share your views document', Highways England promotes the importance of gaining opportunities for improving connectivity and minimising potential conflicts for pedestrians, cyclists, equestrians and walkers, where necessary. However we suggest 'minimising potential conflicts' is a low benchmark. The bar should be set much higher, to grasp the opportunity for the enhancement of sustainable transport and connectivity – public transport, walking, cycling – in the scheme area.

Taking this further, whilst we recognise that this is a road scheme, we think the balance is weighted too heavily in favour of the motorist. The eventual scheme should strike a balance through the



delivery of local modal shift opportunities, encouraging sustainable travel as part of its environmental impact mitigation measures.

#### **Paragraph 9.1.11 (Page 83)**

We suggest the following replacement of the paragraph 9.1.11 text, to provide a correction of details:

The Pennine (not Penning) Bridleway National Trail is available to horse riders, cyclists and walkers and currently has two alternative sections of route in the vicinity of the scheme – (a) passing between Broadbottom and Hollingworth, an interim route for walkers only, and (b) passing between Gamesley and the west side of Hadfield, available for all users.

**Paragraph 9.1.12 (Page 83)** refers to severance of the interim route of the Pennine Bridleway for walkers; also the route of the Tameside Trail and the Etherow Goyt Valley Way. Given the status of these routes and the benefits that they offer, it is important that the impact of the proposed A57 Trunk Road is mitigated through the provision of high quality segregated road crossing facilities.

#### **Paragraph 9.1.13 (Page 83)**

We suggest the following replacement of the paragraph 9.1.13 text, to provide a correction of details:

Section (b), as detailed above, of the Pennine Bridleway (National Trail), shares its route in this vicinity with the Trans Pennine Trail and National Cycle Route 62. This route crosses the A57 at Wooley Moor, with safety provided by a Pegasus crossing. This crossing point is in close proximity to the proposed junction of the new A57 Link Road and the existing A57.

#### **Paragraphs 9.1.12 and 9.1.13 (Page 83)**

The scheme area is crossed by, or in very close proximity to, a number of long distance trails affording access to the Peak District National Park. The Pennine Bridleway National Trail, the Trans-Pennine Trail and National Cycle Route 62 provide miles of off-road routes for horse riders, cyclists and walkers.

We would expect design considerations to be developed in conjunction with the appropriate Trail bodies, particularly to give thought to the continued safe enjoyment of the Trails for users and the segregation of the Trails from the new road network (including during construction). It is suggested that Highways England has the opportunity to deliver and showcase high quality landscape restoration and enhancement of the Trails with appropriate visual and noise screening and proposals for habitat enrichment.

It should be noted that the Pennine Way and Trans-Pennine Trail are National Trails that currently suffer from the severance effects of crossing the A57 and the A628. Highways England has indicated there will be an induced growth of traffic on these roads, leading to even greater severance. The A628 Pegasus Crossing at Tintwistle, which carries the Pennine Bridleway, is currently subject to an exceedance of the AQS with regard to Nitrous Oxides. Any increase in traffic through Tintwistle is likely to worsen this exceedance. Therefore, it is of primary importance that this reduction in air quality is acknowledged, fully understood and mitigation measures proposed within the final Environmental Statement.

The plans show proposals to sever and close or divert a number of rights of way within the scheme area. We would hope to see this balanced by the delivery of new high quality walking and cycle routes that really do improve connectivity and bring about a notable re-joining of the communities, along with opportunities for the enhancement of public transport.





**PDNPA Core Strategy Policy T2** opposes 'transport developments which increase the amount of cross-Park traffic or have other adverse effects on its setting and character, amenity and enjoyment'. The lack of comprehensive road traffic modelling from Highways England is of significant concern. Without this information we cannot ascertain the wider impacts and scale of adverse effects upon the setting, character, amenity and enjoyment of the National Park, particularly with regard to a number of non-motorised user (NMU) trails:

- Pennine Way - probably Britain's best known National Trail, providing a long distance walking route from Edale to Kirk Yetholm;
- Pennine Bridleway – a National Trail for horse riders, cyclists and walkers;
- Trans Pennine Trail - a nationally important recreational route that offers a multi-user coast to coast experience and which links key urban centres across the north of England.

The Pennine Way suffers from negative severance effects where it crosses the A57 at the summit of the Snake Pass and where it crosses the A628 at Crowden. These crossing points are located within the Peak District National Park and the national speed limit applies at both locations. The speed and density of traffic, along with weather conditions prone to create poor visibility, can make both of these crossing points hazardous for walkers.

The Pennine Bridleway (National Trail) crosses the A628 in Tintwistle. The speed limit at this point is 40mph and safe crossing is provided by a Pegasus crossing. Tintwistle is currently subject to an exceedance of the AQS with regard to Nitrous Oxides. Any increase in traffic through Tintwistle is likely to worsen this exceedance. Therefore, it is of primary importance that this reduction in air quality is acknowledged, fully understood and mitigation measures proposed within the final Environmental Statement.

The Trans Pennine Trail suffers from negative severance effects where it crosses the A628 at Woodhead; west of Salter's Brook; east of Salter's Brook. All three of these crossing points are located within the Peak District National Park and the national speed limit applies at all of these locations. The speed and density of traffic, along with weather conditions prone to create poor visibility, can make these crossing points hazardous, particularly as progress along the route entails crossing the same road three times.

(Please note, further information relating to these Trails is provided further below under the heading Rights of Way.)

Any increase in traffic on the A57 and A628 may result in greater severance, reduced air quality, visual and noise intrusion and other changes affecting the amenity and enjoyment for NMU's on the above mentioned trails and crossing points, along with any other Rights of Way and Access Land in the vicinity of these roads. Greater severance would imply an increased risk of danger to NMU's users as they attempt to cross these roads. Trail users being subjected to longer delays waiting for gaps in traffic may lead to frustration and result in higher levels of risk being taken. We would expect the safety of all trail users to be a key consideration within the current proposals.

Increased traffic could also lead to adverse effects upon the setting, character, amenity and enjoyment of the National Park for NMU's, additional to road crossing safety concerns. Any resultant poor NMU experiences may also lead to negative feedback being circulated to other potential NMU's, with detriment to National Park purposes.

Therefore we are very concerned about the impacts from any increased traffic on the wider road network and on recreationists using open access, trails and paths in the vicinity of the road network.



However it is impossible to quantify these concerns without the appropriate information. In this case the lack of traffic flow modelling has compromised our ability to properly respond to this consultation and has engendered a very cautious assessment of potential impacts.

**Paragraph 9.1.24 (Pages 84 and 85)** suggests that Tameside is located within the East Midlands; this is incorrect. The following sentence suggests that High Peak Borough is located within the North West, which is again incorrect. Given the context of the paragraph (comparing local and regional unemployment rates), it is unclear which part has been transposed incorrectly; the regional or local.

### **9.3 Potential effects and mitigation measures**

**Paragraph 9.3.2 (Page 85)** refers to the fact that assessment of potential effects is ongoing, with further detailed assessment to be provided within the Environmental Statement. By the time of the publication of the Environmental Statement the public consultation will have ended. This means that responders to the consultation are being asked to comment on the scheme without being fully apprised of the implications of that scheme. This makes it difficult to provide meaningful comment, and negates both the transparency and effectiveness of the consultation. As stated previously, we would expect Highways England to offer further opportunities for consultation to the Authority and others, once traffic flow data is available.

#### **Access Land**

Both the A628(T) and A57 Snake Pass cross large areas of open moorland designated as Access Land under the Countryside and Rights of Way Act 2000.

Access Land provides the public with the wide range of public benefits of open air recreation on foot, fulfilling one of the founding principles of the Peak District National Park; namely to promote opportunities for the public's enjoyment of the special qualities of the area.

The extensive areas of access land and the associated public rights of way network encourage participation in a range of activities as well as simply 'getting away from it all'. They allow exploration of the spectacular scenery and opportunities to enjoy the tranquillity and to connect with nature and the cultural heritage of the landscape whilst helping to deliver wider social and economic benefits to rural and urban communities.

The Access Land of the Peak District National Park is freely and easily accessible and attracts people from all ages and walks of life to benefit from escape, adventure, enjoyment, inspiration and reflection in a high quality landscape and to make life-long connections.

Tranquillity and quiet enjoyment of the English countryside is recognised by the majority of people as one of its most important qualities and makes a significant contribution to the enjoyment of an area. It is important for our mental and physical well-being, and improves our quality of life. It is a key factor in maintaining the rural economy, being one of the main reasons why people head for the countryside. Protecting this quality, which has been identified as one of the Special Qualities of the National Park (National Park Management Plan) is a key priority to us.

The proposal to increase traffic flows on the roads crossing these significant areas of Access Land will have a detrimental impact on the public's enjoyment of these special areas by increasing noise and visual intrusion to a wide area in an otherwise wild and tranquil location. Both roads are visible from a wide area and impact on the enjoyment of a large proportion of the most wild and remote parts of the Dark Peak area. These impacts have not been assessed meaningfully in any way, which we feel is a major omission.



## **Rights Of Way**

Both the A57 and A628 crossed by the Pennine Way, Britain's first and most famous National Trail. The Pennine Way follows the Pennine chain of hills along the rugged backbone of England and offers 268 miles of the finest upland walking in England. One of the key attractors for the Pennine Way is the opportunity to enjoy Britain's wild open spaces and to 'get away from it all'.

The road crossings of the A57 and A628 already provide significant barriers to progress along the trail and the enjoyment of it. By proposing to increase road traffic these impediments will increase and the enjoyment of the trail and its founding principles will be detrimentally affected. The existing Pennine Way crossing of the A628 would benefit significantly from visibility improvements and better warnings for traffic, this need will become imperative if the volume or frequency of traffic is to increase.

The A628 is also crossed by the Pennine Bridleway, a parallel route to the Pennine Way but promoted as a long-distance route for horse-riders and cyclists. The TransPennine Trail runs the length of Longdendale en route from coast-to-coast and crosses the A628 in several places. Both of these important long-distance recreational trails will be impaired by the increased traffic volumes in the road proposals; not only from increased noise and visual intrusion, but by the increased hazards on the road crossings.

Should the proposals go ahead, it will be important to consider traffic-flow at the road crossings for all these important and popular trails to ensure they can be used safely. It is also important that users of these routes are not unduly disadvantaged because their mode of travel is non-motorised.

## **Crowden Car Park**

Crowden Car Park is a free to use car park located adjacent to the A628 within the Longdendale Valley. The car park is owned by United Utilities and managed by the Peak District National Park Authority. The car park includes picnic facilities and a toilet block, with the access road also providing access to Crowden campsite. The car park provides access to the Pennine Way and Trans Pennine Trail as well as other footpaths. The site is well used at present by a variety of people, but has seen high levels of anti-social behaviour; this has led to the site being degraded in a variety of ways.

Whilst not appropriate for this use, the site is heavily used by HGV's travelling along the A628. This compromises inappropriate use, and can lead to damage to verges from the overrun required to manoeuvre in and out of the car park. The access to and from the car park can be difficult due to poor visibility splays and the speed and number of vehicles travelling on the A628. This is particularly the case for large and less manoeuvrable vehicles such as HGVs.

The predicted increase in traffic flows along the A628(T) as a result of the proposed scheme is likely to increase the use of the site, particularly the toilets. This could lead to further issues of quality and safety at the site.

Given the likely increase in traffic, there is a real potential to improve this site as part of the scheme possibly including a refreshment concession. With appropriate investment to include National Park interpretation and messaging, Crowden could provide a safe site for a comfort break on the Trans-Pennine route.

## **Unsafe Junctions**



There are two road junctions with the A628 within the National Park that are extremely challenging for users joining the A628. These are the B6105 / A628 junction and the A628 / A6024 junctions. In both cases visibility is compromised for vehicles exiting these junctions. Any increase in traffic flows along the A628 within the National Park is likely to worsen conditions for users of these junctions, as well as potentially increase the risk to road users on the A628.

## **Chapter 10 – Noise and Vibration**

### **10.1 Existing environmental conditions**

**Paragraph 10.1.4 (Page 91)** refers to the classification of ‘other sensitive receptors’ including National Parks, SACs, SPAs and SSSIs. This reference is supported.

**Paragraph 10.1.5 (Page 91)** refers to the ‘other sensitive receptors within the Study area’, which are represented in Figure 10.1. Because of the expected increase in traffic beyond the immediate vicinity of the scheme, we would expect there to be wider consideration of the impacts of the scheme. The expected increases in traffic (an additional 1,280 vehicles AADT including an increase of 152 HGVs per day) along the A628, including through the village of Tintwistle would suggest that the scheme will result in a fairly significant increase in noise. Similarly, bearing in mind the reference within paragraph 10.1.4, we would expect to see some recognition of the potential noise impacts on the South Pennine Moors Special Area of Conservation (SAC); Peak District Moors Special Protection Area (SPA); and Dark Peak Site of Special Scientific Interest (SSSI). This is particularly pertinent bearing in mind some of the potential operational impacts referred to within Table 7.1 on these designated areas.

It has been suggested that traffic flows will also increase on the A57 Snake Pass (an additional 1,220 vehicles AADT) and the A6024 (an additional 190 vehicles AADT), both of which pass through the South Pennine Moors Special Area of Conservation (SAC); Peak District Moors Special Protection Area (SPA); and Dark Peak Site of Special Scientific Interest (SSSI). It is not reasonable to suppose that this will lead to an increase in traffic noise with the same potential effects described within Table 7-1.

As touched on earlier in relation to Air Quality, it is anticipated that the increased cross-park flows will have an impact on traffic flows on the A616 Trunk Road. Langsett village which lies on the boundary of the National Park already carries high levels of traffic with the associated impact of noise and vibration. The buildings here are set in close proximity to the carriageway. An assessment of noise impacts resulting from the scheme at this location should form part of the Environmental Statement despite the distance of Langsett from Mottram, because it forms part of the same Southern Pennines Strategic Road Network route.

As referred to above, we also expect the effects of any increase in noise and vibration to be assessed for the recreational users of the tracks, trails, paths and open access areas. As these are already affected by the existing traffic, and tranquillity is one of the Special Qualities of the National Park, we would aim for a reduction in the effects rather than any increase.

**Paragraph 10.1.10 (Page 92)** refers to the noise monitoring locations shown on Figure 10.1. It is appreciated that these reflect the changes in close proximity to the scheme itself. However, as indicated above, the scheme is likely to have negative impacts on species within the South Pennine Moors Special Area of Conservation (SAC); Peak District Moors Special Protection Area (SPA); and Dark Peak Site of Special Scientific Interest (SSSI). Because of this we would wish to see appropriate noise monitoring in close proximity to these sites at key points.



Similarly, the A628 and A57 are both crossed by National Trails within the National Park, including the Pennine Way, the Pennine Bridleway and the Trans Pennine Trail. An increase in vehicles will negatively affect users of these routes in terms of noise impact. Therefore, we would also wish to see the inclusion of crossing points of these routes as monitoring locations.

The inclusion of a monitoring location at Langsett would also be recommended to fully understand the potential increase in noise at sensitive receptors within the village resulting from expected increase in traffic flows.

## **10.2 Other baseline information to be obtained / surveys undertaken**

**Paragraph 10.2.2 (Page 93)** refers to the High Peak District Council; presumably this should be High Peak Borough Council.

## **Chapter 11 – Road Drainage and the Water Environment**

### **General**

We note the revised road junction layout where the proposed A57 link road meets the current A57 at Woolley Moor, with a signal controlled junction replacing the previously proposed roundabout. This approach reduces the potential for obstruction within the River Etherow flood zone. Please also note our comment earlier in relation to scheme objectives and biodiversity on balancing ponds and quality of discharges to streams.

## **Chapter 12 – Geology and Soils**

### **12.1 Existing environmental conditions**

**Paragraphs 12.1.27 and 12.1.28; Table 12-2 (Page 108)** refer to the existing recorded landfill sites within the Study Area. It is acknowledged that these sites could pose a threat to sensitive receptors. It is also possible that there are other unknown areas of contaminated land. Because of the distance from the National Park boundary, it is unlikely that these sites would impact on the National Park. However, under dry windy conditions it is possible that contaminated material from these sites could be carried westwards by the prevailing winds into the surrounding built up areas including Tintwistle. It is also possible for contaminated soil to be carried out of the area on the wheels or other parts of vehicles exiting the site. Therefore it is important that all measures are taken to ensure that any contaminated soils are contained within the compound and dealt with in-situ where possible. Where it is not possible to do so, the transport of the contaminated soils should not allow for any cross-contamination.

We seek assurance against the possibility of such loads posing a risk to the National Park.

### **12.3 Potential effects and mitigation measures**

**Paragraph 12.3.2 (Page 109)** refers to the opportunity offered by the cutting to become a learning resource for geology students during the lifetime of the scheme. This is a positive outcome, but would necessitate easy safe access to the site on foot, in order to maximise this potential. We feel that it is unlikely that any teacher or lecturer would wish to take students to view exposed geological features beside a busy main road for health and safety and noise reasons.



**Table 12-3 (Page 111)** refers to the potential for maintenance workers to be exposed to contaminated materials during the operational phase of the scheme. Table 13-7 suggests that any contaminated soil exposed during the scheme would be “*identified, removed and kept separate from other CD&E wastes to avoid contaminating ‘clean’ materials*”. If this is the case then there should not be any risk to roadside maintenance crews during the life of the scheme.

If however, there is a risk to maintenance crews from contaminated soils, then it shouldn't be assumed that this will not have wider impacts. Table 14-3 makes it clear that the uncertainty of climate change effects could mean that any near surface contaminated land could become exposed as a result of the combination of any of the following; drought, strong winds, heavy rainfall, severe frost and ground upheaval / settlement. The increase in temperatures may also make any stabilising vegetation more susceptible to pests and / or diseases. The presence of the geological faults referenced at paragraphs 12.1.7 and 12.1.8, must also be considered in this respect, as any earth movement may lead to slippage and subsequent exposure of sub-surface materials.

It is important that any contaminated land exposed as a result of the scheme is treated and made safe, rather than covered over in the hope that it will not become exposed again during the operation of the scheme.

## **Chapter 13 – Materials**

### **General**

We are pleased that Highways England, as part of the scheme's environmental objectives, has stated that the scheme is being designed to avoid unacceptable impacts on the natural environment and landscape in the Peak District National Park. One way in which this approach could be upheld is by ensuring the transportation of material resources or waste will avoid the use of roads through the National Park wherever possible. This could be achieved through tender and contract specifications.

### **13.1 Existing environmental conditions**

**Paragraph 13.1.1 (Page 114)**, there is the potential for construction materials to be sourced from within or adjacent to the Peak District National Park, including from locations such as Hope Cement Works. This could lead to increased HGV movements transporting materials to the site, with the obvious negative impacts on the National Park and its residents. Where feasible, we would wish to see materials arrive and leave by rail as far as possible, with only the last stage of the journey made by road, preferably by appropriate routes and around rather than across the National Park.

**Paragraph 13.1.11 (Page 115) and Figure 13.1** refer to waste management sites in close proximity to the scheme. The closest landfill site is at Birch Vale, and whilst it is located outside of the National Park boundary, there is the potential negative impact of construction traffic accessing this site via the National Park.

### **13.3 Potential effects and mitigation measures**

**Table 13-7 (Page 119)** refers to the diversion of vegetation waste away from landfill, provided that it is not of an invasive species; this approach is supported.

The table also refers to the treatment of hazardous waste (please see comments above in relation to Geology and Soils. In order to fully avoid further potential contamination, the treatment of contaminated soil on site would be preferable. Where it is to be transported off-site, it should be



under strict control to avoid any cross contamination. This is particularly important for any vehicles crossing the National Park, due to the extremely sensitive nature of the moorland and water course environments.

There are specific permitted reserves of aggregates within the National Park; this raises the question as to whether these sites should be tested as an additional potential 'receptor'?

Table 13-7 (page 120) refers to the logistics in relation to the scheme. We support an approach of only allowing full loads of materials, in order to manage the impacts of construction traffic. This approach should also apply to any vehicles removing waste material from the construction site.

In addition to traffic movements on the highway network caused during the construction phase, there is a potential for diversion of materials & waste vehicles onto the National Park road network in the longer term. The wording of the last 'Receptor' (Page 120) should be adapted to reflect this.

## **Chapter 14 – Climate**

### **14.3 Potential effects and mitigation measures**

**Table 14-3 (Pages 124 and 125)** refers to the potential loss of soil in relation to heavy rainfall events and / or increased wind speed. As referred to above in reference to Chapters 12 and 13, this may lead to the exposure of contaminated soils associated with the scheme, if they are not adequately treated during construction.

**Table 14-3 (Pages 124 to 132)** refers to the potential loss of vegetation as a result of climate change impacts. As referred to above in reference to Chapters 12 and 13, this may lead to the exposure of contaminated soils associated with the scheme, if they are not adequately treated during construction.

**Table 14-3 (Page 127)** under changes in humidity and increase in temperature, the two potential effects are the same, just worded slightly differently.

**Table 14-3 (Page 129)** under risk to construction design "*Increase in frequency and intensity of heavy rainfall events / flooding*". An additional risk is the mobilisation of contaminants as a result of heavy rainfall and flooding events. These may be subsurface in water courses and exposed due to flood induced erosion, or brought to the road surface following periods of drought. Where there are low flows of water this can lead to the concentration of waterborne contaminants where they are present in the watercourse. We would wish to see this identified within the environmental statement.

**Paragraph 14.3.5 (Page 133)**; there is no real identification of the assessment of Greenhouse Gas Emissions resulting from the scheme. The traffic modelling that we have been privy to would suggest an increase in traffic flows along the A628 through Tintwistle in the order of 1,200 vehicles, and an increase along the A57 Snake Pass of a similar amount. It is unclear whether this is new traffic or re-routed. If it is re-routed traffic, it is similarly unclear whether the rerouting is now using the most appropriate route or not.

We wish to be assured that any modelling in relation to greenhouse gas emissions takes account of the potential for this wider induced traffic flow impact.



In short, the lack of detail provided makes it difficult to assess the net impacts or benefits of the scheme in relation to greenhouse gas emissions. In order to understand the benefits or impacts of the scheme an assessment of overall end-to-end journeys taking account of vehicle speeds, topography and congestion would be required.

## **Chapter 15 – Assessment of Cumulative Effects**

### **15.1 Methodology**

**Paragraph 15.1.6 and Table 16-1 (Pages 135 and 136)** refer to the Zone of Influence of the scheme on individual receptors. We welcome the suggestion that the Air Quality, Noise and Vibration and Climate Change Zones of Influence be related to the Traffic Model. An indication of the scope of this area would be useful in providing comments. However, we feel that it should include all roads where a significant increase in traffic is expected. These would include the A628(T), A57 Snake Pass, A6024 Holme Moss Road and the A616(T) through Langsett.

The Zone of Influence for Biodiversity should reflect the potential impacts of increased traffic flows including air quality, noise & vibration and severance on the South Pennine Moors Special Area of Conservation (SAC); Peak District Moors Special Protection Area (SPA); and Dark Peak Site of Special Scientific Interest (SSSI). For this reason it should mirror the Zone of influence for each of these topic areas.

Similarly, the increase in traffic will affect enjoyment of the National Trails including the Pennine Way, the Pennine Bridleway and the Trans Pennine Trail. These iconic routes have crossing points along the A628 and A57 within the Peak District National Park. Any increase in traffic of the order suggested will adversely impact on users in regard to air quality, visual intrusion, noise, safety and severance. This impact should be included within the People and Communities Zone of Influence, which should reflect the traffic model.

Similarly, the impact on the communities of Tintwistle and Langsett should be recognised and acknowledged within the assessment. In both cases, residents will be subjected to increased traffic flows with the associated visual, auditory, air quality and severance issues that might be expected from a 1,200 daily increase in vehicles (A628).

### **15.2 Assessment of intra-scheme effects**

Paragraph 15.2.3 (Page 137) refers to the sensitive receptors for the purposes of the assessment. We would recommend the addition of the following; Humans (National Trail Users) and Ecological Features (SAC / SPA / SSSI). As referred to above, we would wish to see an assessment of impacts across all routes with significant traffic growth, including the A628(T), A57 Snake Pass, A6024 Holme Moss Road and the A616(T) through Langsett. The provision of a comprehensive up-to-date traffic model would enable this assessment to be made and allow a better understanding of the wider benefits and impacts.

## **Glossary**

**Page 153** – Stakeholder appears twice

**Page 154** – Statutory Consultees appears twice

## **Summary of response**





The Peak District National Park Authority recognises the severe impacts of traffic on the residents of Mottram Moor and Glossopdale and the wish to address these issues. However, whilst not objecting to the principle of addressing these issues, we do have significant concerns regarding their wider impacts on and within the National Park.

In particular, we are very concerned about the impacts of increased traffic flows through the National Park villages of Tintwistle and Langsett, and on the main cross-park routes, the A57, A628, A6024 and A616. Both of the villages are already also blighted by the impacts of traffic including air quality, noise and severance.

We are also very concerned about the impacts from any increased traffic on the wider road network on the Peak District including on the South Pennine Moors Special Area of Conservation (SAC), Peak District Moors Special Protection Area (SPA), and Dark Peak Site of Special Scientific Interest (SSSI) as well as the impact on recreationists using open access, trails and paths in the vicinity of the road network. However it is impossible to quantify these concerns without the appropriate information. In this case the lack of traffic flow modelling has compromised our ability to properly respond to this consultation and has engendered a very cautious assessment of potential impacts.

Finally, we are concerned that the issues that will result from the delivery of the scheme will undoubtedly bring more pressure to bear to address the need for a further bypass around Hollingworth and Tintwistle, with the requirement for road building within the National Park, which would be contrary to PDNPA policies and to National Park's legislation and purposes.

**Given these concerns and the lack of information available within this consultation against which to assess these concerns, the Authority wishes to register a holding objection until such time as the information which addresses its concerns is available, and the Authority is afforded an opportunity to offer additional feedback on this information.**

Please do not hesitate to contact me if you wish to discuss this matter or to arrange a meeting so that we can consider how to address the National Park Authority's concerns.

Yours sincerely



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