

A57 Link Roads

TR010034

**9.38 Applicants comments on Written
Representations**

Rule 8(k)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

January 2022

Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

A57 Link Roads Development Consent Order 202[x]

9.38 Applicants comments on Written Representations

Rule Number:	Rule 8(1)(k)
Planning Inspectorate Scheme Reference	TR010034
Application Document Reference	TR010034/EXAM/9.38
Author:	A57 Link Roads Project Team, National Highways and Atkins

Version	Date	Status of Version
1	January 2022	Deadline 3

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1. Introduction

- 1.1.1. This document sets out National Highways' comments on the Written Representations submitted to the Planning Inspectorate on or before Deadline 2 (14 January 2022) namely:
- Bamford and Thornhill Parish Council (REP2-060)
 - National Trust (REP2-079);
 - Peter Simon (REP2-082)
 - Savills on behalf of Crossways Commercial Estates Ltd. (REP2-084)
- 1.1.2. National Highways has sought to provide comments on responses where it is helpful to the Examination to do so, for example where clarification is required on a statement made by an Interested Party or where National Highways considers that it would be appropriate for the Examining Authority to have National Highways' views in response to a matter raised by an Interested Party.
- 1.1.3. Where issues raised within the representation have been dealt with previously by National Highways, for instance in response to a question posed by the Examining Authority in its first round of written questions, National Highways response to Local Impact Reports or within one of the application documents submitted to the Examination, a cross reference to that response or document is provided. The information provided in this document should, therefore, be read in conjunction with the material to which cross references are provided.
- 1.1.4. In order to assist the Examining Authority, National Highways has not provided comments on every point made within a response, since as stated in paragraph 1.1.3 it may have been addressed already. For the avoidance of doubt, where National Highways has chosen not to comment on matters raised by Interested Parties this is not an indication National Highways agrees with the point or comment raised or opinion expressed.
- 1.1.5. National Highways is reviewing other Written Representations received at Deadline 2 with a view to responding to these, where considered appropriate and necessary, at Deadline 4, in accordance with the examination timetable issued by the Examining Authority.

2. REP2-060 Bamford and Thornhill Parish Council

Response reference	Issue	National Highways response
	1. Bamford with Thornhill Parish (in High Peak Borough) lies just off the A57.	
	2. The Parish Council recognises that the proposed A57 Link Roads scheme aims to improve conditions for residents in the Mottram area, and for those who need to visit or drive through that area.	
	3. Bamford is nearly 20 miles away from Mottram, but the effect of this scheme on traffic volumes will be felt throughout the A57's Snake Pass section between Glossop and Bamford (and beyond towards Sheffield).	
	4. The scheme is predicted to cause the A57 Snake Pass to experience a daily increase in traffic of 1,150 vehicles (by 2025) and 1,450 vehicles (by 2040). Although the applicant's Environmental Statement states this as a 38% increase over today, it also describes it as a 'slight increase' in traffic. We do not agree; it is clearly a significant increase - especially in the context that the Snake Pass lies in a National Park. National policy stresses the importance of road schemes and their effects being thoroughly assessed to avoid or minimise impacts on National Parks; we can see no evidence that such assessment has been attempted by the applicant, even though the potential for increased noise and pollution is surely obvious.	Although the Scheme is forecast to result in up to a 38% increase in daily traffic along the A57 Snake Road/Pass, the absolute forecast increase in the number of vehicles is relatively low, representing up to approximately one additional vehicle per minute in each direction, even at the busiest times.
	5. Some of the abovementioned 38% increase will presumably, on reaching Ladybower Reservoir, then use the A6013 to go through Bamford, a road which is narrow and curved in the village centre. Traffic volumes through the village already cause concern; a further increase in them will not be acceptable to us.	Traffic modelling undertaken to assess the impact of the Scheme indicates that the traffic flow on the A6013 through Bamford will marginally reduce by 1% compared to without the Scheme.
	6. The A57 Snake Pass is a hilly and heavily curved route throughout, with numerous examples of poor sighting on bends. The route's inadequate layout already leads to fatal collisions, and, because of its topography, it is wholly unsuitable for an appreciable increase in traffic volumes. (Its A-road status perhaps gives an erroneous impression that it is a satisfactory trunk road; it most certainly is not. And, being in a National Park, it is well used by cyclists, who would be at risk from increased traffic levels.) We would urge the members of the Examining Authority, if not already familiar with the Snake Pass, to visit it, in order to fully appreciate its unsuitability.	
	7. In summary, we strongly contend that the applicant has largely ignored the adverse effects of the proposed scheme on the portion of the A57 east of Glossop, and that these are significant and need to be much more thoroughly studied and assessed.	

3. REP2-079 National Trust

Respon se referen ce	Issue	National Highways response
	<p>Summary</p> <p><i>National Trust is a conservation charity with a membership of more than 5 million people. Within the Peak District National Park, we own and manages a wide range of landscapes and their related flora and fauna. Much of this land is designated at national and international level for its ecological importance.</i></p> <p><i>National Trust owns large areas of land on either side of the A57 Snake Pass as it travels through the Peak District National Park. As well as passing through highly designated land, this road is essential to our operation. The Snake Pass is a challenging road on which accidents occur, parts of which are also subject to land stability issues.</i></p> <p><i>While we do not object in principle to the scheme, we have significant concerns about the additional traffic that it will generate through the Peak District – particularly on the Snake Pass – and the associated road safety and environmental issues.</i></p> <p><i>We are concerned about the modelled increase in accident risk on the Snake Pass. This, and ongoing land stability issues, pose a risk to the operations of National Trust staff and tenants.</i></p> <p><i>We are concerned about detrimental effects on the biodiversity of the Peak District as a result of worsening air quality along the Snake Pass, which passes through designated sites.</i></p> <p><i>We believe that the applicant should be proposing traffic restraint measures to disincentivise cross-park traffic on the A57, and to ameliorate its impacts. We are also keen to see ecological mitigation and enhancement close to the impacted roads to help to ensure that habitat restoration work continues to move in the right direction.</i></p>	
	<p>Introduction</p> <p>1.1 National Trust is a conservation charity with a membership of more than 5 million people. We are responding to the A57 Link Roads Development Consent Order (DCO) application principally because of the impacts that it may have on our assets and operations within the Peak District National Park. We do not object in principle to the promotion of a scheme to address localised road issues while also improving journey reliability between Manchester and Sheffield. However we have some significant concerns about the impacts of the current scheme on traffic levels,</p>	

Respon se referen ce	Issue	National Highways response
	<p>associated road safety and environmental issues on the A57 Snake Pass and adjacent land.</p> <p>1.2 The National Trust was founded in 1895 as an independent charity to hold and manage, in perpetuity for the benefit of the nation, countryside and historic buildings in England, Wales and Northern Ireland. The Trust fulfils its statutory responsibilities as laid down in the National Trust Acts, through ownership and direct management of the properties in its care. Section 4 of the National Trust Act 1907 defines the purpose of the National Trust as ‘The permanent preservation for the benefit of the nation of lands and tenements (including buildings) of beauty or historic interest and as regards lands for the preservation (so far as practicable) of their natural aspect features and animal and plant life’. The Act also enables the National Trust to declare land inalienable, meaning that such land cannot be sold or mortgaged and once declared cannot be reversed.</p> <p>1.3 Within the Peak District National Park, we own and manage a wide range of landscapes and their related flora and fauna, from open moorland, limestone gorges, edges and cloughs to enclosed farmland. In total we own or manage in partnership over 18,000 hectares, which constitutes 13% of the area of the National Park. We also hold covenants over other land in the National Park. A map showing National Trust ownership in the area around the A57 is provided in Appendix 1 of this Written Representation. We are focusing our response primarily on potential impacts on National Trust land and operations.</p> <p>1.4 The A57 Snake Pass is vital to our operation, providing access for land management, farming and recreation to the large areas of land that we own on either side of the road. National Trust’s farm tenants, and our staff, use vehicle access points along the road to gain access to the land that they farm and manage, as well as their homes. There are also numerous footpaths across National Trust land with access points along the A57. A map showing the locations of the vehicle and pedestrian access points along the A57 Snake Pass that are most relevant to our operations can be found in Appendix 3.</p> <p>1.5 The Snake Pass is a challenging road on which accidents occur, as is evidenced by the Applicant’s Transport Assessment. Parts of the road are also subject to land stability issues, including areas known to the National Trust that are subject to active monitoring. The implications of the scheme for road safety are discussed further in section 3 of our Written Representation.</p> <p>1.6 Much of the land that we own or manage is of international importance for biodiversity and is designated as a Site of Special Scientific Interest, Special Protection Area, and Special Area of Conservation. These important habitats are discussed further</p>	

Response reference	Issue	National Highways response
	in section 4 of our Written Representation. A map showing designated land in the area around the A57 can be found in Appendix 2.	
	<p>Impact of traffic increase on the Peak District National Park</p> <p>2.1 National Trust is concerned about potential traffic increases on roads within the Peak District National Park as a result of the A57 Link Roads DCO, in particular a modelled 38% increase in daily flow on the A57 with associated impacts on the statutory purposes and Special Qualities of the Peak District National Park.</p> <p>2.2 One of the stated aims of the scheme is to improve the reliability of journey times between Manchester and Sheffield (although not speed per se), with the focus being on the A57-A628 trunk road route (see Transport Assessment Report Executive Summary and paragraphs 1.2.1, 1.4.4 and 1.5.11). A key, problematic ramification of the scheme is therefore that it will also more significantly increase traffic on the A57 Sheffield Road and Snake Pass – a predominantly two-way single carriageway road that is not part of the Strategic Road Network and is therefore managed by Derbyshire County Council rather than the scheme promoter National Highways. This often winding road passes through sensitive landscapes and ecosystems of the Peak District.</p> <p>2.3 The Special Qualities of the Peak District as outlined in the National Park Management Plan 2018-23 are:</p> <ol style="list-style-type: none">1. Beautiful views created by contrasting landscapes and dramatic geology2. Internationally important and locally distinctive wildlife and habitats3. Undeveloped places of tranquillity and dark night skies within reach of millions4. Landscapes that tell a story of thousands of years of people, farming and industry5. Characteristic settlements with strong communities and traditions6. An inspiring space for escape, adventure, discovery and quiet reflection7. Vital benefits for millions of people that flow beyond the landscape boundary <p>2.4 These qualities and the potential for impacts on them are broad and interconnected – for example the quality of landscapes and their embedded heritage features resulting from their remote, scenic and aural characteristics and people’s ability to access and enjoy them – and these may not all be easily captured and reflected within the framework of an Environmental Impact Assessment.</p>	

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	<p>2.5 Additional traffic will result in additional noise, visual disturbance, air pollution, and potentially additional recreational pressures such as parking, footfall, litter and fire risk in areas adjacent to the A57. It may also make crossing the road more difficult for both pedestrians and wildlife, potentially increasing collision risk.</p>	<p>Any ‘visual disturbance’ caused by increased traffic has been identified in the visual assessment that included a range of viewpoints set adjacent to the A57 (Environmental Statement (ES) Figure 7.4: Representative Viewpoints (APP-093) and Figure 7.8: Visual Effects Drawing (REP-097)). These cover a range of visual receptors including residential, recreational and commercial receptors. Potential impacts on their views, visual amenity and auditory amenity are described in Appendix 7.1: Visual Effects Schedule (REP2-042).</p> <p>Mitigation to provide visual screening is shown in Figure 2.4 Environmental Masterplan (APP-074) with the key on Sheet 1 indicating the environmental functions which include Environmental Function A (EFA): Visual Screening, Environmental Function E (EFE): Visual Amenity, and Environmental Function G (EFG): Auditory Amenity. For each of these, the landscape elements (e.g. planting and seeding) is given to demonstrate the commitment method to achieving the environmental function.</p> <p>Please see RR-0677 in our “Comments on Relevant Representations” (REP1-042) in terms of air pollution, noise, wildlife collision and impact on footpath users.</p>
	<p>2.6 By looking at the A57 roadside area around the entrance to the Pennine Way we can see the way in which these factors can erode the Special Qualities of the National Park, for example through unmanaged vehicle parking and associated land erosion (in this case necessitating ad hoc extensions to hard standings and double yellow lining) at a highly prominent position in the landscape. Fast moving vehicles on this section of road are also an existing issue.</p>	<p>ES Chapter 7: Landscape and Visual (REP2-007), Table 7.32: Indirect Visual Effects on Representative Viewpoints within the PDNP recognises that the existing view includes the A57 is a perceptible feature on the moorland top with vehicle flows and parked vehicles (adjacent to the Pennine Way crossing) visible. Whilst there will be a likely slight increase in vehicle numbers on the A57 Snake Pass, due to the existing baseline where traffic flow, changes would not likely be perceptible and the perception of the ‘Special Qualities’ of the PDNP would remain unchanged.</p>
	<p>2.7 The National Policy Statement for National Networks (NPS) states that ‘Great weight should be given to conserving landscape and scenic beauty in nationally designated areas’ (NPS paragraph 5.150). Importantly it states that ‘Planning of the Strategic Road Network should encourage routes that avoid National Parks...’ (NPS, paragraph 5.152), going on to state that ‘The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them’ (NPS, paragraph 5.154).</p> <p>We are concerned therefore that the A57 Link Roads DCO application will not only result in a significant increase in traffic through the National Park, but also a very significant traffic increase on an already problematic road that does not form part of the Strategic Road Network. This is further discussed in section 3 of our Written Representation.</p>	<p>Paragraphs 5.150 and 5.152 of the NN NPS fall under the section relating to “development proposed within nationally designated areas” such as a National Park. No part of the Scheme is located within the Peak District National Park. However, given the location of the scheme in relation to the extent of the Peak District National Park (PDNP), any alternative routes avoiding the PDNP would be substantial in their extra length and as such would be likely to generate additional environmental impacts.</p> <p>We respond to this point below.</p>

Response reference	Issue	National Highways response
	<p>Road safety and condition on the A57 Snake Pass</p> <p>3.1 National Trust is concerned about the modelled increase in accident risk on the A57 Snake Pass. This, and ongoing land stability issues, pose a risk to the operations of National Trust staff and tenants. We believe that increased traffic on the road, including use by Heavy Goods Vehicles (HGVs), may exacerbate issues associated with inappropriate vehicle speeds and poor road conditions, creating potential for more frequent collisions and road closures.</p> <p>3.2 In section 1 of this Written Representation we briefly described the importance of the A57 Snake Pass for the operations of the National Trust, its tenants and recreational access points. Maps showing our land ownership around the A57, designated land, and vehicle and pedestrian access points that we rely on can be found in Appendices 1, 2 and 3. We are aware that Derbyshire County Council has recently commenced monitoring areas of land instability that affect the Snake Pass (including National Trust land). While we understand that the landslide area is extensive and unlikely therefore to be impacted by increased vehicle numbers on the road, it is continuing and we are uncertain about the severity and progression of the issue. If closures for repair and maintenance of the road are likely to become more frequent and prolonged in future then the knock on effects for alternative routes including the A628 may need to be considered.</p> <p>3.3 Traffic modelling reported in application document 7.4 Transport Assessment Report (TA) predicts that the scheme will result in an increase in traffic on the A57 Sheffield Road within the Wider Route Network of 38% (TA, Table 7.2). In terms of road safety, the most significant negative impacts of the scheme are found to be on the A57 Snake Pass and the A628 where there is a forecast growth in accident numbers (TA, paragraph 7.2.9). On the A57 Snake Pass, a road that is already known to have a high accident rate, there is a modelled increase of 160 accidents over the 60-year appraisal period exceeding the total impact across the rest of the network combined (TA, paragraph 7.2.13). This leads to the following statement within the TA:</p> <p><i>7.2.14 As Snake Pass is an identified accident issue which will see flow increased as a result of the scheme, measures should be pursued to minimise these negative impacts.</i></p> <p>3.4 The NPS for National Networks states that ‘New highways developments provide an opportunity to make significant safety improvements’ (NPS, paragraph 4.60). It goes on to state that ‘Applicants will wish to show that they have taken all steps that are reasonably required to: ... contribute to an overall reduction in road casualties’ (NPS, paragraph 4.64) and that ‘The Secretary of State should not grant development consent unless satisfied that all reasonable steps have been taken and will be taken</p>	<p>Response to 3.1, 3.3, 3.4 & 3.5 regarding road safety on the A57 Snake Road/Pass.</p> <p>Please refer to National Highways’ response RR-0240-6 to the Relevant Representations (REP1-042).</p> <p>The forecast increase in road accidents is based on the simplistic assumption that the forecast increase in traffic using the A57 Snake Road/Pass and the A628 due to the Scheme will result in a proportional increase in accidents. This does not necessarily mean that the Scheme will actually result in an increase in accidents on these sections of the road network. It should be noted that the Scheme improves road safety elsewhere on the affected road network and that the overall forecast increase in accidents equates to less than a 0.3% increase across the appraised road network, which represents only a marginal overall increase.</p> <p>The forecast increase in accidents is a potential negative impact of the Scheme, but this is outweighed by the journey time savings and associated economic benefits that will be delivered by the Scheme.</p> <p>Nonetheless and as previously stated, National Highways will collaborate with Derbyshire County Council to identify potential measures to improve road safety on the A57 Snake Road/Pass.</p> <p>This will include providing National Highways’ expert advice if requested and appropriate. National Highways recognises that any road safety improvement measures will need to be delivered by Derbyshire County Council as local highways authority and will need to be agreed in conjunction with the Peak District National Park Authority.</p> <p>National Highways has a Designated Funds allocation, which is separate to our core work of operating, maintaining and improving England’s strategic road network. It provides ring-fenced funding that National Highways use to invest in and support initiatives that deliver lasting benefits for road users, the environment and communities across England. We welcome applications for funding from external organisations. All applications will need to demonstrate compliance with the required assessment criteria. If a suitable scheme to address the current issues being encountered along the A57 Snake Road/Pass can be identified, then National Highways will look to support DCC throughout the Designated Funds allocation process.</p> <p>Response to 3.2.</p> <p>National Highways considers that this is a matter between Derbyshire County Council and the National Trust.</p> <p>Response to 3.6 & 3.7.</p> <p>Please refer to National Highways’ response 3.10 to the Examining Authority’s first Written Questions (REP2-021).</p>

Response reference	Issue	National Highways response
	<p>to: - minimise the risk of road casualties arising from the scheme; and - contribute to an overall improvement in the safety of the Strategic Road Network' (NPS, paragraph 4.66).</p> <p>3.5 We are aware of no road safety measures for the A57 Snake Pass in association within the DCO application. National Trust believes that there are a number of options for traffic restraint measures that could mitigate road safety effects by reducing traffic numbers and/or speeds on the Snake Pass. These are further discussed in section 5 of our Written Representation.</p> <p>3.6 Before discussing traffic restraint measures it is useful to also consider the potential for modal shift. Within the Examining Authority's First Written Questions (no. 3.10) the Applicant has been asked whether any allowance has been made in the modelling for modal shift resultant from other Transport and Works Order Schemes including new passing facilities for the Hope Valley Rail Line approved in February 2018. The Hope Valley Line is the main railway link between Manchester and Sheffield and is discussed within section 3.4 of the Applicant's TA. According to the TA, the Trans-Pennine Express provides the fastest city-city service with an average journey time of 53 minutes. Since publication of the TA, the Government has published its Integrated Rail Plan for the North and Midlands (IRP) in November 2021, and improvements to the Hope Valley Line are addressed on pages 16 and 109-111. Approved works to improve the Hope Valley Line are already underway, including line speed and capacity works, a passing loop at Bamford and improvements at Dore and Topley station (see IRP, paragraph 3.93). According to the IRP, additional improvements could result in rail journey times of between 30 and 35 minutes between Manchester and Sheffield with potential to support up to four trains an hour (IRP, paragraph 3.91) subject to careful design and resolution of technical and capacity issues (IRP, paragraphs 3.94-3.96).</p> <p>3.7 The Hope Valley Line follows a similar corridor to the A57 Snake Pass and serves a number of Peak District settlements including Hathersage and Edale. While it is not possible at this stage to comment on the acceptability of any future rail proposals, there appears to be scope for a modal shift towards rail travel for journeys between settlements which we believe further improves the case for traffic restraint on the A57 Snake Pass.</p>	
	<p>Air quality and biodiversity impacts in the context of moorland restoration</p> <p>4.1 We are concerned about detrimental effects on the biodiversity of the Peak District National Park as a result of worsening air quality along the Snake Pass, which passes through a number of nationally and internationally designated sites. We would wish the applicant to carefully consider and address this issue.</p>	<p>The affected road network (ARN) for the air quality assessment for the operational phase of the Scheme has been determined in accordance with DMRB LA 105 (paragraph 2.1).</p> <p>The A57 Snake Road, between Ellison Street (Glossop) and the A6013 is the only road that meets DMRB LA 105 traffic scoping criteria, and that lies within 200 metres of a European Site. Changes in nitrogen deposition rates on habitats within South Pennine</p>

Response reference	Issue	National Highways response
	<p>4.2 As we briefly outlined in section 1 of this Written Representation, National Trust owns large areas of land in the Peak District National Park that are of national and international importance for biodiversity and are designated as a Site of Special Scientific Interest (SSSI), Special Protection Area (SPA), and Special Area of Conservation (SAC). A map showing designated sites around the A57 in relation to National Trust land ownership can be found in Appendix 2. The Natural England SSSI citation for the Dark Peak states that ‘The combination of plateaux blanket mires; wet and dry heaths and acid grasslands, together with associated flushes and mires on moorland slopes, represents an extensive tract of semi-natural upland vegetation typical of and including the full range of moorland vegetation of the South Pennines’ (Natural England SSSI citation 1003028: Dark Peak). It goes on to state that ‘As a result of high levels of atmospheric pollution, the blanket mires of the Dark Peak are poor in bog and other mosses sensitive to pollution’.</p> <p>4.3 The High Peak Moors exhibit some of the most extreme damage to sensitive blanket bog habitats seen in the UK. This is linked back to the pollution caused since the industrial revolution. Today most industrial pollution has ceased, although nitrogen deposition continues to be a key source impact. The National Trust has been investigating and delivering restoration of blanket bog, and associated habitats of the High Peak Moors, since the acquisition of Kinder Scout 40 years ago, working with partner organisations including Moors for the Future. The last 20 years has seen the biggest input of restoration effort and that pace is growing. The methods we use; gully blocking to restore water tables, revegetation of bare peat and diversification with Sphagnum moss are essential actions to bring the bog back into healthy, carbon capturing condition. In addition our woodland creation helps to buffer more sensitive habitats from the impacts of localised pollution. The map in Appendix 4 illustrates restoration work that has been carried out on the High Peak Moors.</p> <p>4.4 However, despite the efforts of the last 20 years, restoration timescales are long, and a considerable amount more is needed before we reach the point of healthy blanket bog. We need to accelerate our rate of progress in light of the climate emergency, and we need to protect the work that has been done to date.</p> <p>4.5 According to the Habitats Regulations Assessment Screening Report (HRA), projects can adversely affect a European Site by causing delays in, or interrupting, progress towards achieving the conservation objectives of the site. In relation to the European Sites close to the scheme, the A57 was considered the only route to meet the traffic screening criteria for inclusion in the air quality assessment (HRA, paragraphs 4.1.2-4.1.3). It should however be noted that the outlook for the A628 is likely to be similarly negative.</p> <p>4.6 The Affected Route Network (ARN) of the scheme includes sections of the A57 that pass through or adjacent to the Peak District Moors (South Pennine Moors Phase</p>	<p>Moors SAC and Peak District Moors SPA adjacent to this section of the A57 were therefore undertaken as part of the air quality assessment.</p> <p>The changes in nitrogen deposition rates with the Scheme are less than the DMRB LA 105 designated habitat criterion of 0.4 kg N/ha/yr within the South Pennine Moors SAC which overlaps with the Peak District Moors SPA. The competent biodiversity expert considered the change in nitrogen deposition and concluded the Scheme was not expected to have a significant effect on the designated habitats within these sites. Natural England agreed that there would be no significant effect from air quality impacts on the integrity of the European site in its Written Representation submitted at Deadline 2 (REP2-080).</p> <p>The A628 does not meet the DMRB LA 105 traffic scoping criteria and has been screened out of assessment. Where traffic change criteria are not exceeded, such as on the A628 adjacent to the South Pennine Moors SAC and Peak District Moors SPA, this indicates that there would not be a significant effect on the designated habitats due to the Scheme at these locations.</p>

Response reference	Issue	National Highways response
	<p>1) SPA and the South Pennine Moors SAC. For the South Pennine Moors SAC, Qualifying Features are: European dry heaths; Blanket bogs; Old sessile oak woods with Ilex and Blechnum in the British Isles; North Atlantic wet heaths with Erica tetralix; and Transition mires and quaking bogs. The Conservation objectives of the SAC are to ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features. Vulnerabilities of the SAC include air pollution and air-borne pollutants.</p> <p>4.7 The HRA assessors consider that the only potential source-impact pathway for significant effects is through an increase in atmospheric pollution via the ARN during operation (HRA, paragraph 5.1.2). According to transport modelling the scheme would result in an average increase in daily trips of up to 1172 in 2025 and 1432 in 2040 (HRA, Table 5.2 and Appendix C). This would result in increases in atmospheric pollution on the ARN which may result in localised air quality impacts, including an estimated increase in nitrogen deposition of 0.21 kg N/ha/yr. While this may not be considered to be 'significant' for the purposes of the HRA, it is a move in the wrong direction for a designated landscape that already significantly exceeds the lowest Critical Load of 5 kg N/ha/yr, exhibiting baseline levels of >30 kg/N/ha/yr (See HRA, Tables 5.2, EIA Chapter 5 and associated Appendices). This clearly conflicts with the objectives of the SAC to restore levels of deposition of air pollutants to at or below the Critical Load, with a staged recovery target to transition to the next lower class of Critical Load exceedance (see HRA, Table 5.2, p29).</p> <p>4.8 The HRA acknowledges that '... any further increase in nitrogen deposition could be considered to be harmful. However, the air quality impacts from the road will always be confined to the existing road corridor, i.e. the extent of habitat already affected by the road' (HRA, Table 5.2, p30).</p> <p>4.9 The NPS for National Networks promotes a positive approach to mitigation and enhancement including the following: 'In delivering new schemes, the Government expects applicants to avoid and mitigate environmental and social impacts in line with the principles set out in the NPPF and the Government's planning guidance. Applicants should also provide evidence that they have considered reasonable opportunities to deliver environmental and social benefits as part of schemes' (NPS, paragraph 3.3). As well as assessing likely significant effects on designated sites of ecological importance as part of an Environmental Impact Assessment (NPS paragraph, 5.22), the NPS states that "The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests' (NPS, paragraph 5.23).</p> <p>4.10 The need to protect the sensitive ecology of the High Peak Moors is one of a range of factors contributing to the National Trust's case that traffic restraint measures</p>	

Response reference	Issue	National Highways response
	should be employed on the A57 Snake Pass – see section 5 of this Written Representation. In section 6 we also highlight an opportunity for National Highways to take a positive approach to ecological mitigation and enhancement on a sensitive area of peat bog habitat adjacent to part of the A57 ARN.	
	<p>Traffic restraint measures on the A57 to mitigate the impacts of the scheme</p> <p>5.1 For the reasons contained in the preceding sections of our Written Representation, National Trust believes that the applicant should be proposing measures to disincentivise cross-park traffic on the A57 Snake Pass and to ameliorate its impacts. It is notable that while the proposed scheme relates to the Strategic Road Network, it is forecast to result in a greater traffic increase on the already constrained and problematic Snake Pass which is not part of the Strategic Road Network. This road is generally subject to a speed limit of 50mph, but with limited enforcement and with winding sections that may benefit from a lower speed limit.</p> <p>5.2 Traffic restraint and technology measures that might be used in order to achieve traffic reduction and/or calming on the Snake Pass include road user charging, weight limits, reduction in speed limits and/or average speed checks. Such measures would have multiple interrelated benefits such as: reduced impacts on National Park purposes and qualities, reduced accident rates, improved air quality and a reduction in nitrogen deposition, subject to an appropriate design that minimises landscape/visual impacts.</p> <p>5.3 National Highways’ response to the suggestion of a road user charge within our Relevant Representation refers to an existing time-based charge on all HGVs and goes on to state that ‘tolls and other forms of road user charging are matters for the UK Government’ (9.5 Comments on Relevant Representations, RR-0620-6). While the NPS confirms this aspect of Government policy for the Strategic Road Network, charging on other roads is ‘a matter for local and other traffic authorities’ (see NPS, paragraph 3.26) and a collaboration between National Highways and Derbyshire County Council may not therefore be out of the question, should the County Council consider this appropriate. An alternative means of specifically controlling use of the road by HGVs could be to introduce a weight restriction.</p> <p>5.4 The next option is a further reduction in speed limits and/or complementary average speed checks. We note that within National Highways’ Deadline 1 response there is a commitment to collaborate with Derbyshire County Council to investigate what road safety measures could be introduced on the A57 Snake Road (9.5 Comments on Relevant Representations, p104, RR-0620). However, we are concerned that National Highways also states that any proposed improvements will not be included in the DCO for the scheme as this part of the A57 is not a National</p>	<p>Please see the National Highways’ response reference RR-0170-1 in REP1-042 for a response regarding options to constrain HGV access across the National Park. We have also previously responded to the National Trust in RR-0620-6 of REP1-042 on this point.</p>

Response reference	Issue	National Highways response
	<p>Highways road. We trust that the Examining Authority in discussion with the Applicant and Derbyshire County Council will determine whether improvements (or traffic restraint measures) to the A57 can be secured using planning conditions or obligations.</p> <p>5.5 Finally, it is important to note that any fixed infrastructure associated with traffic restraint measures may itself have an adverse impact on the character and Special Qualities of the Peak District National Park. It is therefore important that any mitigation proposals should be sensitively designed, having regard to the Peak District National Park Authority's Transport Design Guide, and where possible replacing existing road hazard warning signs to reduce visual clutter.</p>	
	<p>Opportunity for biodiversity mitigation and enhancement</p> <p>6.1 In relation to the concerns raised in section 4 of our Written Representation, should the A57 DCO be granted consent National Trust is keen to see ecological mitigation and enhancement adjacent to the A57 Snake Pass and potentially also the A628, helping to ensure that habitat restoration continues to move in the right direction. Land owned by the National Trust adjacent to the A57 Snake Pass offers a potential receptor site for such measures and we would welcome the opportunity to engage more fully with the applicant.</p> <p>6.2 We note National Highways willingness to engage in discussions about off-site enhancement opportunities (National Highways 9.5 Comments on Relevant Representations, RR-0620-7) along with an indication that any commitment to these enhancements will sit outside the DCO application. Whether or not written into the DCO application, we are looking for a commitment to habitat restoration measures on land that is close to the A57 and within its likely impact zone in terms of nitrogen deposition.</p> <p>6.3 The map in Appendix 5 illustrates an area close to the A57 Snake Pass where some moorland restoration work has been carried out in the form of gully blocking and the planting of Sphagnum Moss plugs, but where significant issues persist. Photographs of peat erosion issues and restoration works in this area are also provided in Appendix 6. To date, owing to the need to spread scarce resources, Sphagnum Moss plugs have only been established in the pale green shaded area at a very low density of 1,150 plants per hectare. There is therefore an opportunity to significantly contribute to the diversity of bog forming vegetation in this area through additional planting of Sphagnum Moss plugs (aspirationally – to a density of 10,000 plugs per hectare, i.e. 1 plug per square metre) in the shaded area and other areas of bog immediately adjacent to the A57 road corridor.</p>	<p>As per National Highways' Relevant Representation response to RR-0620 (REP1-042), the opportunity to discuss off-site enhancement opportunities with the National Trust is welcomed. However, it should be noted that any commitment to these enhancements will sit outside the DCO application.</p>

4. REP2-082 Peter Simon

Response reference:	Representation Issue	National Highways Response
	<p>A. Introduction</p> <p>The Scheme represents economic aspiration rather than economic necessity. Its environmental and human cost is too great, and the route can be enhanced otherwise to deliver suggested benefits without unacceptable impacts. Collateral improvements it might offer to some communities are only piecemeal and will involve unsustainable damage elsewhere in the “affected network”.</p>	
	<p>B. Scope</p> <p>The exact scope for evidence for this examination into the DCO Application for the A57 Link Roads remains to be finally established as regards spatial and temporal boundaries. My submission is therefore prepared on the basis that an Inspector has advised in a Preliminary Hearing that the guiding metric is that of National Policy (NNPS2014) and will proceed on that basis unless indicated otherwise. (Preliminary Meeting 1 - Session 3 - Transcript - 16 November 2021, P11). I consider mainly the immediate time frame of the scheme because even assuming the modelling to be reasonably accurate it cannot be a firm prediction, and becomes increasingly uncertain over time.</p>	
	<p>C. Impacts on AQMAs.</p> <p>NNPS2014 (5.1) indicates that the ultimate Decision Maker for the Scheme, the SOS for Transport, requires complete assurance regarding no detriment to air quality levels in designated AQMAs to allow the DCO. This definitive test applies within the “affected network” including “areas” in High Peak Borough, notably that on the A57 at Dinting Arches but also in Glossop Town Centre and in the eastern approach to Tintwistle. It has been publicly acknowledged by the Applicant, that issues in this area have already forestalled a very similarly designed scheme previously known as the “Trans Pennine Upgrade”.</p>	<p>The air quality assessment for the Scheme has been undertaken with regard to the National Policy Statement National Networks (NPS NN) 2014. As stated in ES Chapter 5 (Air Quality) section 5.10 (REP2-006) it is considered that overall, the Scheme is consistent with the relevant requirements set out in the NPS NN.</p> <p>The study area for the air quality assessment has been determined in accordance with the Design Manual for Roads and Bridges (DMRB) LA 105. DMRB LA 105 defines traffic change criteria for determining whether air quality impacts can be scoped out or require assessment (DMRB LA 105 paragraph 2.1). The traffic change criteria were applied to output from the Scheme specific traffic model to determine the ARN. The Scheme specific traffic model includes strategic roads, including the A57 through the Glossop AQMA and the A628 through Tintwistle AQMA. Both the extent of the ARN and the AQMAs are presented in Figure 5.1 in Environmental Statement (APP-076).</p> <p>The traffic change due to the Scheme along the A57 in Glossop does not meet the DMRB LA 105 traffic scoping criteria between the A57 Dinting Vale junction and the junction with Ellison Street in Glossop Town Centre. The A57 north of the Dinting Vale junction and the A626 Glossop Road do exceed the traffic change criteria and the Dinting Vale junction, which is within the Glossop AQMA, has been included in the air quality assessment.</p> <p>The traffic change due to the Scheme along the A628 meets the DMRB LA 105 traffic scoping criteria between the junction with Woolley Lane and New Road and receptors</p>

Response reference:	Representation Issue	National Highways Response
		<p>have been included in the air quality assessment. This section of the A628 is not within the Tintwistle AQMA.</p> <p>Evaluation of the significance of the effect of the Scheme on human health has been undertaken in accordance with DMRB LA 105 (paragraph 2.89 to 2.96). Only those receptors where Air Quality Strategy (AQS) objectives are exceeded with or without the Scheme are included in the evaluation. Of the 76 receptors informing the overall significance of effect of the Scheme on air quality, 67 are in AQMAs. One receptor located in the Glossop AQMA at Dinting Vale junction (receptor number R319) is expected to have a small worsening in air quality, while 66 receptors located in the Greater Manchester AQMA adjacent to the A57 in Mottram and are expected to have medium and large improvements.</p> <p>It is acknowledged that there would be increases and decreases in air pollutant concentrations due to the Scheme and the resulting redistribution of traffic on existing roads. However, the assessment undertaken for the ES concluded that on balance the Scheme is expected to result in an overall improvement in local air quality for human health receptors, with decreases in concentrations such that there is a reduction in the extent of areas where government AQS objectives are exceeded. Where there are increases in concentrations these are either in areas where government AQS objectives are not exceeded or in the case of the receptor in Glossop AQMA, in a location where government AQS objectives are exceeded both with and without the Scheme</p>
	It appears the burden of proof is on the Applicant to ensure no detriment to AQ as described (5.11 to 5.13) were the scheme operational so the question I obviously raise is the viability of any new solution here?	
	Glossop is notorious for its current traffic constraints and congestion around the Dinting railway arches and Shaw Lane junctions. All day and especially during peak hours traffic backs up and moves slowly in queues through the town in both directions with a characteristic level of pollution. This takes place within the steep valley topography to create a “canyon effect” which as matters stand traps the NoX emissions and particulates to unacceptable levels. These are particularly injurious to local schoolchildren at Dinting Primary, with regard to their respiratory and developmental health, and is partly why the AQMA designation exists in the current Do Minimum situation. In a Do Something scenario as modelled, the traffic rises significantly in the relevant area.	
	The DCO Application submission solution seems fairly straightforward. It perceives traffic as naturally diverting to the freest alternative route so as to relieve the A57. In particular it forecasts a dramatic around 50% traffic level rise on 3k AADT on the parallel route of Dinting Road to 4,500 AADT. (TR010034-000234-6.5 ES Appendix2.1 Traffic Data Insert 3)	

Response reference:	Representation Issue	National Highways Response
	<p>The NH case evidence models diversions along 2 specific routes through Glossop and Hadfield</p> <ol style="list-style-type: none"> 1. The route as identified to experience a near 50% traffic increase along Shaw Lane, and then onto Dinting Road, to return at its end onto feeder roads into the A57 at Glossop Centre. 2. An additional route through Hadfield taken from “Insert 3” as referenced that would seek to divert traffic away from A57/Glossop Centre by adopting a circular route along Hadfield Road and Cemetery Road joining the B6105 Woodhead Road as a feeder road. This increase is around 11% so the main focus remains on the proposed Dinting Road impromptu “bypass” of the A57. 	<p>Please refer to National Highways’ response RR-0240-15 to the Relevant Representations (REP1-042).</p>
	<p>In each direction the Shaw Lane segment is only wide enough to accommodate single file traffic, so there is an unofficial waiting system in place now relying on driver consideration particularly with the passage of 237 bus. The current situation only imperfectly allows for the existing capacity, a far from ideal situation. Without CPOs and house/factory demolition it is not possible to envisage this informal one way system being able to accommodate further traffic with a heavy increase of the kind envisaged for diversion. NH claim in answer to the Relevant Representations of 2 statutory local authorities that the increase would amount to one journey per minute, not at scheme opening, but at 2040. (TR010034_9.5) . I cannot find any verifiable calculation to test this assertion in documents available at this Examination. Even if it were a reliable claim which is dubious as it stands, the traffic fluctuates wildly in this location so this is a meaningless statistical projection without reference to a specific time of day.</p>	<p>The traffic modelling used to assess the Scheme has been calibrated and validated using observed traffic data to ensure that it reflects as accurately as possible the operation of the road network and accounts for existing capacity constraints on each link and at each junction.</p>
	<p>The route then adopts a lateral trajectory along the minor 2-lane Dinting Road. The appearance here is deceptively rural as “committed development” is poised to occupy nearly the entire length of the road frontage. Imminently its character will change dramatically so there will be continual impediment to traffic flow through vehicle entry off access routes from estates. This I show through diagrams of two of the high density committed developments and an indicative sketch showing access points for committed and existing developments super imposed on the NH diagram (Figures 1, 2, & 3 & TR010034-000229-6.4 Environmental Statement) (footnote*)</p>	
	<p>It should be noted the Applicant’s optimistic surveys of this route do not record the considerable foot commuting of school age children along this route with a specific crossing place for the back way to the school at Newshaw Lane. This daily back and forth “migration” arose from the relocation of Glossop’s main school around 2016; foot journeys forming a fair proportion of journeys to school. Notably more school places are to become available due to need at the school in 2022/3 with accordingly a further rise in pedestrian passage. The journey is already hazardous, with few passing places, and minimal pavements where children tend to step into the road. There is a sharp bend at the top of the road also where pupils also arrive from Dinting Railway Station. It is hard to believe this diversion route would have been seriously proposed</p>	

Response reference:	Representation Issue	National Highways Response
	as a major alternative by a responsible Applicant if they were aware of the risk to safety. However NH appear to decline any such responsibility. "This part of the road network is outside the scheme boundary and it is therefore a matter for DCC to address issues of traffic using alternative roads to avoid congestion on Glossop High Street". (footnote 2**)	
	On the basis of these verifiable observations it is clear that the natural diversion principle, on which NH contend no NNPS AQMA violation through the Scheme, is not credible, and their conclusions in this area must be considered to be dubious if not plainly wrong.	
	2. The route directly through Hadfield to and from the Woodhead Road, the B6105.	
	The High Peak traffic model for future years, particularly 2025 also detects an alternative route to filter through the heart of Hadfield, suggesting it now accommodates 5150 AADT journeys, with an approximate 8% increase to 5750 by 2025 at scheme opening.	
	Traffic does "rat run" currently down through Hadfield, so the proposal is to expand the "rat run" here. The actual figures in the model are only established at one end, but Figure 3 highlights the route to be taken is down Hadfield Road so I consider that as the NH evidence. This stretch will be effectively at capacity now.	
	The eastern higher top end contains a series of impediments namely : a difficult T Junction at Redgate on a hill brow with poor sightlines, an extremely difficult multi crossroads at full capacity at the Railway Street junction to Hadfield (again on the 237 bus route) , and a single lane bridge on Park Road. The entire Hadfield end of the route is mainly double parked between Park Road at the top to Wooley Bridge at the bottom, so effectively a single lane route with much LGV use. Traffic is not likely to divert away from the A57 here, as, in the manner of water, it would be discouraged by resistance to free passage.	The traffic modelling used to assess the Scheme has been calibrated and validated using observed traffic data to ensure that it reflects as accurately as possible the operation of the road network and accounts for existing capacity constraints on each link and at each junction.
	There is no incentive for drivers to adopt this as a viable natural alternative. Some traffic as now will possibly trickle across all these routes, but in general the bulk of the flow as increased will remain or return to the A57 on discovery of there being no advantage in journey times with the longer parallel or circuitous routes.	
	Thus the strategy regarding AQMA mitigation through diversion does not hold, and the legal policy impediment in NNPS2014 remains as it cannot be credibly shown that worsening congestion will not occur with pollution levels over adopted EU legal limits within the AQMA.	<p>The air quality assessment concluded that there are not expected to be any significant adverse air quality effects with the Scheme. Mitigation of operational impacts of the Scheme on air quality was therefore not required. The Scheme specific traffic model used in the air quality assessment did not include any assumptions around traffic routing to mitigate the potential for adverse effect on AQMAs in the local area.</p> <p>The assessment of compliance with EU limit values in the Air Quality Directive has been considered in ES Chapter 5 (REP2-006) using the principles in DMRB LA 105 (paragraph 2.64 – 2.87).</p>

Response reference:	Representation Issue	National Highways Response
		The compliance assessment modelling results show that the Scheme would not result in an increase in concentrations of annual mean NO2 where there are existing exceedances of the annual mean NO2 limit value, nor would there be any new exceedances of the annual mean NO2 limit value be introduced by the Scheme. The Scheme would not result in any area which is currently reported as being compliant with the Air Quality Directive becoming non-compliant. Consequently, the Scheme is not considered to be a risk to non-compliance with the Air Quality Directive in any area.
	Beyond these suggestions as scrutinised above, the NH evidence traffic model is limited generally, as regards projections for the affected network in the residential area of Hadfield at opening phase. Where other routes are identified in the TA but not modelled I would suggest it is incomplete for the needs of this Examination. Were missing evidence for any relevant part of the “affected network” obtained I am sure it could be shown that there are significant impediments elsewhere, as the notion of potential relief routes for the Glossopdale A57 AQMA sections are demonstrably mistaken.	The traffic model used for the assessment of the Scheme is fully compliant with the Department of Transport’s (DfT) Transport Analysis Guidance (TAG) and is sufficiently detailed, in terms of the roads included, to properly assess the likely traffic impacts of the Scheme.
	(footnote *) Although NH have declined to give a percentage in their answer to my request, it seems from this document that the modelled flows may include those derived from Committed Development. However if so accounted I continue to feel this should be available for consideration at this Examination. I therefore repeat my request to the PM, ignored by NH in their response, for these specific flow additions resulting from “committed development” to be made available as a percentage to allow reasonable certainty regarding the “affected network” at scheme opening.)	<p>The forecast traffic demand used for the assessment of the Scheme is primarily derived from the Department of Transport’s (DfT) National Trip End Model (NTEM). NTEM provides forecast growth in trips based on forecast changes in the economy and demographics by area, e.g. forecast changes in population, car ownership, household spending, levels of employment, etc. NTEM therefore inherently accounts for future development since population growth cannot take place without additional housing development and economic growth cannot take place without additional commercial development. However, NTEM trip origins and destinations are based on relatively large geographical areas (Ward level) and do not therefore reflect the specific locations within each area of future developments that will enable growth. To adjust for this, the matrices of the origins and destinations of forecast trips used in the traffic modelling are adjusted to take account of committed development by refining the start and end points of trips to reflect the specific locations of committed developments using smaller zones. Nonetheless, the overall growth in trips across the assessed road network is capped to the NTEM forecast level of growth.</p> <p>Consequently, the method by which the traffic forecasts are developed does not permit a specific percentage of forecast traffic growth attributable to committed developments to be isolated and derived. Therefore, National Highways are unable to provide the requested information.</p>
	(footnote **) TR010034-000737-TR010034_9.5_Comment_on_Relevant_Representations RR-0240-15Page 12). Interestingly NH find they are accountable to local authorities when considering Longdendale HGV Exclusion alternative, which suggests their assessment of the scheme applies different rules in different areas depending on which they favour for HGV traffic, rather than impartial scrutiny)	

Response reference:	Representation Issue	National Highways Response
	<p>D. Process</p> <p>The part of my submission regarding AQMA's is based upon the National Highways evidence as submitted to the Inquiry. There is other evidence outside their case documentation which apparently according to the Preliminary Meeting has been released to another party CPRE. Such relates to the technical modelling underpinning the Transport Assessment but as a member of the public I can only comment on the case and supporting documentation before the Examination at this stage. Regrettably as it seems a procedural anomaly this possibly key further evidence is not available.</p>	
	<p>It has to be noted that not even a Transport Assessment was available at the Public Consultation which seems to me another gross anomaly. NPPF quite logically requires local residential developments of a certain size to provide a transport assessment so I think one might reasonably expect this to be a given with a national road scheme but apparently not! If the TA was then not yet prepared, as NH claim, the Public Consultation was clearly held prematurely which seems at best unprofessional, if not possibly even improper practice.</p>	
	<p>When the TA became available at the DCO Application stage for Relevant Representations the Technical modelling underpinning the figures and maps was still withheld. I recognise Examination Questions currently with Local Authorities may clarify the status of such material but not for this Deadline 2 Submission. If the withheld technical documents are relevant to these considerations as I suspect, I have to ask if they should not be before the entire public? Should not therefore the Examination return to a much earlier stage or cancelled altogether while NH consider their position?</p>	
	<p>The NH practice seems to have been characteristically obstructive in withholding evidence from the Examination. I note an Interested Party Mr Wimberley has represented very strongly on similar procedural matters and I concur fully with his points. (TR010034-000726-DanielWimberleypost-hearing submissions requested by the ExA P23)</p>	
	<p>Also regarding procedure I would comment on the Applicant's announced intention to prepare a SOCG with Greater Manchester Combined Authority through the agency of GMPTE (Greater Manchester Passenger Transport Executive). As their name suggests GMPTE represent a distinct part of GMCA business which is mainly that of public transport operation and to a degree it's planning. I would query therefore if they could be empowered or qualified as a body to express a view on behalf of the Combined Authority on spatial planning beyond their functional remit.</p>	
	<p>E. "Inappropriate Development" within the Green Belt</p> <p>The tests for "inappropriate development within the GB" designation in NNPS 2014 appear less specific than those for AQ but they are stringent, and there are clearly issues for the Application as regards policy transgression in this respect, notably with NPPF, which is a recognised associate policy to NNPS2014.</p>	<p>We address compliance with national policy in both the NN NPS and the NPPF as regards Green Belt within Section 7 of the Case for the Scheme (REP2-016). We consider the Scheme is compliant with the relevant national policy. We have also provided further detail in section 5 of the Applicant's response to Examining Authority's First Written Questions (REP2-021).</p>
	<p>The scheme divides 3 major sections of Green Belt mainly in Tameside MB previously so designated as to permanently maintain openness between settlements and thus</p>	

Response reference:	Representation Issue	National Highways Response
	<p>contain urban sprawl. The Green Belt land here also additionally functions as an important buffer between Greater Manchester and the Peak District National Park. The affected sections are:</p> <ul style="list-style-type: none"> • M67 Junction 4 to Old Hall Lane to a tunnel entrance • From a tunnel exit at OHLane to the current A57T proposed roundabout • From the A57T roundabout to a proposed Brookfield roundabout. <p>These functions are all in particular sympathy with the aims laid out in NPPF and deserving of the particular protection that is expressed in the text there regarding Green Belts. (Section 13, from Page 41 “Protecting Green Belt Land”)</p>	
	<p>NH claim the scheme “does not involve any other urban development such as new housing, business or industrial uses that would constitute unrestricted sprawl of large built up areas... and that no roads are immediately planned to spur off the scheme”. However the restructured M67 J4 roundabout does link to another major development application by Tameside MBC in the Green Belt for housing via Mottram Old Road so the claim is questionable. The map in ES committed development references about 120 hectares of Green Belt to be removed, whilst a similar area will be compromised by the Link Roads (Figure 4 & TR010034- 000229-6.4 ES Figure 15.1). It is also worth noting in this context that Tameside have previously sought to include an industrial site also partly in Greenbelt, in the initial GMCA draft Plan that would closely follow the “alignment” of the bypass. (GMSF OA26 circa 2017). TMBC have shown they are prepared to act independently from GMCA as with the Garden Village and landowner consent for this proposal means the plans for this site could easily be revived.</p>	<p>It is assumed that this reference refers to the Godley Green Garden Village application. This site lies entirely outside the boundary of the Scheme, separated from it by existing urban development. The Scheme has been bought forward at the national level through DfT’s RIS1 and RIS2 to address longstanding traffic congestion issues and not in response to particular local development proposals which may or may not come forward.</p>
	<p>Tameside UDP of 2007 protects the line of a road scheme through Greenbelt resulting in a the NH case claim that local planning policy support makes their proposal “not inappropriate development in the Green Belt”. (000127-7.1 The Case for the Scheme). What is evident however in view of their other activity is that Tameside MBC, on whom NH depend here show scant regard for national Green Belt policy protection and seem inclined to breach it on the weakest of grounds. So for this NH claim to be properly tested it is appropriate to examine the Tameside approach for spatial planning compliance with national Green Belt policy.</p>	<p>Tameside’s UDP was adopted following a full Examination in Public overseen by a Planning Inspector and was found sound. Notwithstanding this, the Scheme is considered to comply with national policy regarding development in the Green Belt with or without the existence of saved UDP policy T2.</p>
	<p>The overall Tameside Authority policy context for excessive cumulative development in the GB leads to an expectation they plan Longdendale Corridor to become urbanised with disregard for the statutory GB designated purpose to contain urban sprawl. In both cases “exceptional” or “special” circumstances in one area are being claimed for allowing major GB development, which is not a viable logical proposition and so cannot be a tenable policy position. As a Local Authority they submit an impact assessment to this Examination which may confirm this position. It will also soon be further scrutinised for “soundness” at the Greater Manchester “Planning for Everyone draft” Examination later this year.</p>	<p>Tameside MBC’s “Response to the Examining Authority’s First Written Questions (WQ1)” (REP2-056) states that:</p> <p><i>“The scheme as a whole could be determined to be appropriate development in the Green Belt provided that it preserves openness and does not conflict with the purposes of the Green Belt. The Scheme is considered to preserve openness and is not considered to conflict with the purposes of the Green Belt.”</i></p>
	<p>Should the Applicant’s resort to a dubious endorsement from Tameside MBC not hold they appear to further rely on a claim that with the scheme operational the designation</p>	<p>The Scheme is considered to comply with national policy regarding development in the Green Belt.</p>

Response reference:	Representation Issue	National Highways Response
	would not suffer. Realistically this is hard to accept as obviously the proposed road infrastructure for the area would dramatically alter its unique open character and the designation would be fatally compromised. With the fragmentation as described and the cumulative loss of Green Belt nearby, were the Application to gain consent, the Longdendale Corridor seems destined to become urbanised sprawl right up to the National Park boundary.	
	The “special circumstances” NH claim for development on Green Belt, are presumably the ones they might claim for all National Infrastructure linear road schemes, which is that they are in the Roads Programme, and have been fully assessed for any alternatives. It therefore becomes appropriate to consider if indeed all alternative routes have been considered to meet this test, and beyond that whether the scheme’s merits on balance exceed its adverse impacts on the Green Belt.	We address compliance with national policy in both the NN NPS and the NPPF as regards Green Belt within the Case for the Scheme (REP2-016). We consider the Scheme is compliant with the relevant national policy. We have also provided further detail in section 5 of the Applicant's response to Examining Authority's First Written Questions (REP2-021).
	The Policy requires in the case of “inappropriate development” that adverse impacts are weighed against benefits, although I do not know if a standardised methodology actually exists for such a test. The Green Belt depletion and erosion here means any marginal interim outcome in reduced journey times and economic benefit has to be balanced against the permanent loss. An audit in any reasonable assessment does not demonstrate the positive balance sheet outcome required. Certainly there needs to be greater assurance that all alternatives have been considered which I do not think is the case.	
	F. Alternatives & SouthPennines Feasibility Study by Mouchel Consulting leading to RIS1 Adoption Considering the Scheme and the problems it seeks to address, it is inescapable that there is a fundamental conflict here between economic aspiration and the spatial imperative to retain a buffer area between the National Park and the Greater Manchester. A compromise should be found that best addresses these competing interests.	
	I hope therefore that all alternatives will be properly considered at this Examination as a better and more reasonable outcome that delivers most to all stakeholders now and in the future and weighs the needs of the economy with the protection of a finite resource of the National Park. I feel that would be the right solution going forward. As stated in my introduction, many of the limited benefits the scheme purports to provide, in terms of economy/improved journey times and AQ/and community amenity, can be supplied to a reasonable extent through minimal road building, with a simple spur to Stalybridge Road, from the M67 roundabout.	
	This was I believe was an Highways Agency alternative objector gyratory flow proposal to the Mottram/Tintwistle bypass inquiry earlier this century that is in the public domain. (A57/A628 Mottram-Tintwistle Bypass and A628/A626 Route Restraint Measures, Objector’s Alternative Proposals to the Draft Orders Published in February 2007) This would tick many of the boxes of the current Scheme proposal yet without the huge expense. It would also I suggest deliver on audit far more “winners than losers” on both general and individual levels.	

Response reference:	Representation Issue	National Highways Response
	The Mouchel South Pennines Feasibility Study (to be found by search engine at the National Government portal) did not, in my view, attribute sufficient weight to such a minimal road building scheme and so allowed the road proposal to be adopted into RIS1 without a proper consideration of lesser road construction alternatives. The one-way component did survive to be one of 4 schemes selected for further consideration in the Mouchel sifting exercise, but only as conjoined with road building within the National Park and the addition of a component of the current Scheme, the A57T to Brookfield Link Road.	
	The conclusion was that only the road building parts of such a Package would perform for improving journey times and connectivity, which I personally find implausible unless it is underpinned with very clear and testable performance modelling. I could not find any such modelling in the SPFS, and suggest this needs to be re-examined.	
	Furthermore I am not convinced that Mouchel's appraisal methodology appropriately allowed for the extreme environmental sensitivity of this Green Belt Corridor and the proximity of the National Park. Had such a balanced metric been applied I think the Gyratory with minimal Spur construction to Mottram would have emerged as the right compromise candidate here to deliver local congestion relief on all the many counts discussed. Thereby protecting an irreplaceable environmental asset yet allowing economic potential to develop without harm along what is ultimately a constrained high level route through a National Park.	
	G. Co2 Emissions and Climate Change I would contend that any cost benefit analysis assessment of the scheme should treat climate impact (CO2 emissions) on an equal footing with economic growth so a cumulative national approach should apply for both. This is due to the	
	Climate Emergency declared post NNPS2014 with the legally binding target for net zero carbon emmissions in 2050. I note that several parties both statutory and non statutory have expressed a similar concern to the Examination. (eg, RR-0182/RR-0677) This gives me additional confidence to reiterate here my initial RR comments which were "5. The CftS climate impact assessment method predates formal national regional and local climate emergency declarations (2019) so should not be considered fit for purpose for such an assessment now. When government net zero carbon targets were set a cumulative rather than scheme specific assessment become appropriate and the application would then fail on this count."	

5. REP2-084 Savills on behalf of Crossways Commercial Estates Ltd

Response reference	Issue	National Highways response
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	<p>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:</p> <ol style="list-style-type: none"> 1. Relocate the proposed signalised junction southwards at its Woolley Bridge tie in as per the proposed 2018 designs; and <p>Relocate the proposed River Etherow crossing further southwards as per the proposed 2018 design.</p>	
1.5	<p>The remainder of this Report is set out as follows:</p> <ul style="list-style-type: none"> • 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 	

Response reference	Issue	National Highways response
	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: <ul style="list-style-type: none"> The relocation of the signalised junction southwards at its Woolley Bridge tie in as per the 2018 designs; and 	

Response reference	Issue	National Highways response
	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:	
	<u>2017 Consultation</u>	
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.	
	<u>2018 Consultation</u>	
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.	
	<u>2020 Consultation</u>	
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.	

Response reference	Issue	National Highways response
2.13	<p>The proposed amendments and associated justification for doing so can be summarised as follows:</p> <p>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.</p> <p>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.</p>	
3.	Associated Development Potential	
3.1	<p>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.</p>	
	Site Context and Description	
3.2	<p>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.</p>	
3.3	<p>The site has various landowners, one of which is our client CCE.</p>	
3.4	<p>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.</p>	
3.5	<p>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.</p>	
3.6	<p>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</p>	

Response reference	Issue	National Highways response
3.7	<p>approximately 200 metres south of the site. Additionally, agricultural land lies to the west of the site.</p> <p>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.</p>	
	Deliverability	
3.8	<p>Access</p> <p>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.</p>	
3.9	<p>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.</p>	
3.10	<p>Ecology and Landscape</p> <p>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</p>	

Response reference	Issue	National Highways response
	defensible boundary to prevent any encroachment into the countryside beyond the proposed road to the south.	
3.11	Flood Risk and Drainage 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.	
3.14	Heritage 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: <ul style="list-style-type: none"> 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 	

Response reference	Issue	National Highways response
	<p>following the construction of the proposed A57 Link Road given it would then become the defensible boundary.</p> <ul style="list-style-type: none"> 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 <p>Given the place-making opportunity for the development, it would contribute towards the concept of the walkable neighbourhood and sustainable living patterns.</p>	
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 suitability 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	
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.	

Response reference	Issue	National Highways response
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 signalled 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 suitability integrated within the comprehensive masterplan to ensure the long term sustainability of the area.	<p>The 2018 carriageway alignment as presented in figure 1 of the Savills obo Crossways written representation crosses the River Etherow at a skew. This would result in a longer bridge span and a larger, more complex, structure. In addition, it is highly unlikely that the crossing could be achieved with a single span while accommodating the alignment constraints on the approach to the Woolley Bridge Junction and the minimum headroom requirements below the structure. The resulting central pier positioned within the river channel would significantly increase the maintenance requirements for Tameside MBC.</p> <p>The location of Woolley Bridge junction within the proposals consulted on in 2020 aligned with the consented development access road on the east side of Woolley Bridge, allowing this access to be safely incorporated into the Scheme as a signal controlled crossroads.</p>
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	

Respon se referen ce	Issue	National Highways response
	capacity to deliver circa 600 - 700 houses based on a gross site area of c. 27 Ha (c.70 acres).	
5.3	<p>The proposed development site/ SUE will deliver multiple benefits back to the wider Holme Valley and community, as set out below:</p> <ul style="list-style-type: none">• 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 <p>Given the place-making opportunity for the development it would contribute towards the concept of the walkable neighbourhood and sustainable living patterns.</p>	

6.

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Printed on paper from well-managed forests and other controlled sources.

Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ

National Highways Limited registered in England and Wales number 09346363

