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A57 Link Roads Case Team  
National Infrastructure Planning

Peter Simon – A57L-001

**A57 Link Roads – comments on the Applicant’s response of 31<sup>st</sup> October 2022 to the Secretary of State’s consultation letter of 24<sup>th</sup> October 2022.**

Dear Secretary of State

My reply of 12<sup>th</sup> October to the earlier consultation question suggested Places for Everyone as a whole had “considerable bearing” on the A57 Link Roads proposal. This further question explores NH’s response to points raised by CPRE regarding its particular allocation Godley Green Garden Village JPA31 and I respond as invited.

The proposed A57 LRs and GGGV would both be sizeable developments in close proximity within East Tameside and are strategically connected by the A560. This highway, often described as “Mottram Old Road”, terminates with a dual carriageway section at the Southern arm of the M67 Junction 4 roundabout which represents the intended pivotal western end of the A57 LRs scheme.

As I stated previously the gestation period of these two projects has been broadly contemporaneous and exists over several years. GGGV derived from a general exploratory search (“call for sites” and consultation period) around 2014/5 to emerge fully established in the draft Greater Manchester Spatial Framework published for consultation in 2016, which was the Combined Authority’s precursor to PfE. Throughout it has been underwritten by a promise of central government funding from Homes England that I believe persists to this day despite supposed cut off points.

At the time of this draft publication NH were pursuing a package of measures known as the Trans Pennine Upgrade which they ultimately abandoned around 2017 focussing mainly on the current project with much of the Environmental Assessment work carried over. If anything therefore GGGV firmly predates the A57 Links Road Environmental Assessment for the DCO Application. I therefore strongly question the veracity of NH’S claim that *“It is important to recognise that the proposed allocation of, and planning application for GGGV post-date the A57 Link Road application”*.

The allocation pre-dates the application and has always been “foreseeable”. It has considerable momentum because of various planning pressures which means it may be more fairly described as “near certain”, rather than just “reasonably foreseeable”.

2. The NH response to the Secretary of State is essentially this:

*“GGGV was considered neither certain nor near certain but was registered as ‘reasonably foreseeable’ in the A57 project Uncertainty Log. GGGV was, therefore, excluded from the core scenario traffic modelling and analysis for the A57 Link Road scheme, although it was included in the high growth scenario in accordance with DfT Transport Analysis Guidance (TAG)”*.

This failed to take account of both the planning momentum and pressures for GGGV which suggest “near certainty”. Planning momentum consisted of the financial support of National Government as already mentioned. Then there was obviously the support of the emerging Combined Authority planning tier as expressed in the PfE allocation. Added to which the Local Planning Authority Tameside MBC has been no other than the active promoter of the scheme and they would adjudicate therefore

on their own application. As a part landowner public announcements by the Council (easily referenced online) have indicated an expectation of £9million profit which it seems now might have to be ultimately offered at least in part for traffic mitigation. Then there is the housebuilding interest led by top experts in the field, such as Lichfields for Barratts. Few schemes have such an array of support for them to face down professionally the strong public opposition that NH identified as a constraint in their previous response.

NH have been very keen in this response to point out a further constraint which would be the developer burden to fund mitigation for the local SRN so I would seek to know why they have signally failed to declare this in their capacity as a consultee to GMCA promoting the GGGV allocation? This grudging approach to disclosure is, as CPRE have repeatedly pointed out, characteristic of them and it has been seriously disadvantageous to appropriate consideration of their proposal.

So in addition to the strong planning support the main planning pressure for GGGV has been and remains the Tameside housing need requirement. The strong precedent is that housing need shortfalls overwhelmingly influence examination outcomes in favour of granting development; even as here on Green Belt once no alternative locations have been identified. Irrespective of a slight delay in trajectory the following table is serious evidence of the “*high probability*” if not “*near certainty*” of GGGV as illustrated by the reliance placed on it in the primary LPA housing delivery table. GGGV represents circa 76.5% of the PfE Allocations in the table(s) below and thus 1/8<sup>th</sup> of the whole borough’s supply.

### 7.13 The table below summarises the sources of housing land supply up to 2037.

District	Strategic Housing Land Availability Assessment			Allowances <sup>(75)</sup>	Places for Everyone Allocations <sup>(76)</sup>	Total 2020-37	Estimated Completions 2020-21 <sup>(77)</sup>	Estimated Land Supply 2021-2037
	Brownfield land	Greenfield land	Mix brownfield land and greenfield land					
Tameside	5,017	755	575	576	1,558	8,481	-281	8,200

(PfE P132 – current proposed Plan period)

Possible Plan adjusted plan periods **N14 SQ1.12**/Ps9 to 14.)

Table 7.1 – Sources of housing land supply 2021 to 2038 Table SQ1.12:

Table 7.1 – Sources of housing land supply 2021 to 2040 Table SQ1.12M:

Table 7.1 – Sources of housing land supply 2021 to 2042 Table SQ1.12H:

GGGV is thus unlikely to go away and needs to be factored in by NH. The evidence collectively points to a underestimate of probability by NH as they have been unwilling to acknowledge GGGV within the process of their core scenario and analysis. The concession they claim to have made here in their response is to have factored in GGGV traffic impacts on the SRN including the A57 LR in a “*high growth scenario*”. This may be the case but we only have their word for it, because of a failure on their part to supply a relevant diagram to show the projected flows particularly towards the M67 and how it would then filter through the roundabout and the rest of the proposed post A57 LR SRN.

CPRE have identified major discrepancies in the traffic model, particularly with regard to the M67 roundabout and Tintwistle further to the East where the AQMA assessment threshold is perilously close to being triggered. Also they have shown that the pivotal but highly polluted and congested M60 Denton roundabout becomes a consideration as a result of this extra collective traffic stress. I

am confident that much greater accuracy than supplied is reasonably required from the promoter here to satisfy these concerns.

We have been unable to see data in the “HGS” for the precise interplay between the GGGV traffic and the remainder of the model, for full understanding of its significance within the A57 LR examination regarding the stress that it might impose on the SRN, the local traffic network and various environmental impacts. And due to the failure to establish true probability the HGS is of course a serious underestimate and misreading anyway. This failing infects a wide range of environmental and spatial policy matters which will have been reported upon with a recommendation. Key cumulative impacts on the Green Belt and the National Park, which were matters of policy compliance for the Examination against NPPF and NN NPS 2014 have been disguised and or simply rendered invisible. The characteristic lack of disclosure in the NH approach in my opinion has contaminated the A57 Examination process, and possibly prejudiced its findings.

National Highways express concern regarding possible delay to a Decision by the SOS but now this possibility has been raised, this does in fact look the wisest and right choice because while at this point there may not be a final position regarding GGGV a delay would allow far more to be known.

Short term delay is possible because of the obvious ongoing overlap of process for both schemes, and would allow the SOS within a reasonable period to obtain the critically necessary information here for a clear and safe decision.

Yours sincerely

Peter Simon

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### **Glossary of Acronyms**

GB = Green Belt

GGGV = Godley Green Garden Village

GMCA = Greater Manchester Combined Authority

GMSF = Greater Manchester Spatial Framework HGS = High Growth Scenario

NH= National Highways

LRs= Link Roads

LPA = Local Planning Authority

PfE= Places for Everyone

SOS= Secretary of State

SRN = Strategic Road Network