

## **ANNEX 1**

### **Detailed Summary of Key Issues**

#### Timescales

The original timescales for the Scheme have slipped, and as such the Bypass now has an opening year of 2015 and design year of 2030. Thus, the Environmental Statement has utilised these two years for assessing the environmental impacts of the Scheme. However, should funding become available earlier, and the Scheme gains the necessary permissions to continue, construction of the Bypass would begin before 2012. This would have an impact on both the opening year and design year, and thus could alter the significance of the environmental impacts of the Scheme on the National Park. The information in this summary is based upon data for 2015 and 2030, as provided by the Highways Agency. However, should funding become available earlier, the significance of the impacts of the Scheme may change.

#### Traffic Figures

##### *Growth in Traffic*

Although the revised Environmental Statement illustrates lower predicted increases in traffic due to the Scheme, the figures quoted in the 2007 Draft Orders still leads to an unacceptable increase in traffic through the National Park. This would have significant adverse impacts on the landscape and access and recreation. There are considerable concerns about the forecasted significant increase in traffic across the Peak Park Screenline. It is inevitable that changing one section of the road network will affect the network as a whole, as vehicles will re-route to find the quickest route, and some additional journeys will be generated. However, the growth in traffic detailed in the Traffic Forecasting Report is of significant concern. It is acknowledged that there is a predicted decrease in annual average traffic flows on the A635, with a decrease of 3% in 2015 (from 5,800 to 5,600 vehicles) and 4% in 2030 (from 7,900 to 7,600 vehicles). However, this decrease in traffic is not nearly as great as the significant increases in traffic on other cross-Park routes. Average annual traffic flows on the A628 east of the A6024 are predicted to increase by 20% in 2015 (from 12,500 to 15,000 vehicles) and 20% in 2030 (from 13,700 to 16,400 vehicles). Annual average daily trips on the A6024 are predicted to increase by 88% by 2015 (from 1,600 to 3,000 vehicles) and 95%, in 2030 (from 1,900 to 3,700 vehicles). Average annual traffic flows on the A57 Snake are predicted to increase by 4% in 2015 (from 5,400 to 5,600 vehicles) and 11% in 2030 (from 5,700 to 6,300 vehicles). Screen line figures (in the Forecasting Report Appendix G Full Screenline) indicate that a significant amount of this growth represents traffic that is generated by the Scheme (around 4,100 vehicles per day in 2015). Thus, it is suggested that the decrease in traffic on the A635 does not outweigh the significant increases in traffic on the A6024, A57 and A628. This is particularly significant taking into account the impacts of the increases in traffic on the A628 and A57 on the National Park. In addition, increases in traffic of this scale appear to conflict with the aim of the Scheme.

##### *Re-routing traffic*

The Traffic Forecasting Report states that traffic will increase on the Peak Park screenline, with increases in annual average daily trips of 15% in 2015 (from 25,300 to 29,200 vehicles) and 16% in 2030 (from 29,200 to 34,000 vehicles). The report goes on to state that the traffic increase on the A628 is primarily due to drivers changing routes from their existing ones, predominantly from the M62 (1,400 vehicles in 2015) and A50. There is concern that vehicles would re-route from the M62 or the A50 into the National Park with the Scheme in place. The M62 and the A50 are primarily strategic long distance routes, which indicates that cross-Park traffic would increase, as the traffic from them would not otherwise have crossed the Park. The Scheme aims to avoid causing transference of traffic from these routes and includes restraint measures to mitigate against this. However, the proposed route restraint measures, although increased from the 2006 Draft Orders, are still insufficient for this purpose.

## Landscape

It is considered inevitable that the route and scale of the Bypass will have a very intrusive impact on the Landscape of the National Park, since it will cross the generally south facing hill slopes above the settlements of Mottram, Hollingworth and Tintwistle. Whilst the route's direct impact on any existing residential development in the immediate area will be minimal, the road will be clearly visible from the hill slopes to the south-east which face Longdendale. The road will also be viewed fairly closely from Padfield Main Road and from the Trans-Pennine Trail, both of which are on the National Park boundary.

Apart from the obvious scarring caused by a linear green-field site, the related additional impacts of signage, noise, air and light pollution would all contribute to an overall effect on the landscape quality of the area. Furthermore, longer term pressures on the planning and development status of the newly created hinterland between the Bypass and the existing road could further impact on views from the National Park, as the quality and character of the severed landscape produced is inevitably downgraded.

There are also concerns that the Bypass would have a significant adverse impact on the character of the older part of Tintwistle village, which comprises the Conservation Area designation within the National Park. While the three communities to be relieved of through traffic may be receptive to the proposals, it is unfortunate that Tintwistle's Conservation Area will be significantly adversely impacted by the proposed road.

One of the most sensitive and controversial features of the Scheme, entirely within the National Park, is the new roundabout proposed at Townhead Farm, the junction of the old road with the new. This major feature would certainly adversely impact on the appearance and adjacent landscape setting of the eastern 'spur' of the Conservation Area.

It is considered that the overall landscape proposals, both within and on the edge of the National Park, are generally impressive given the extent of the mitigation demanded of such a high impact scheme. However, for various reasons, some of them admittedly outside the control of the Highways Agency, the proposals are not sufficiently varied or subtle enough to reflect the local landscape and agricultural character and therefore provide adequate mitigation.

In conclusion, the 'Qualitative comments' in the AST recognise that the scheme is 'at odds with the local landscape pattern and landform'; is 'visually intrusive'; is 'likely to diminish a range of characteristic features and their setting'; and finally, 'would be damaging to a high quality landscape'. This leads to the assessment that the overall landscape impact of the Scheme would be defined in landscape terms as, 'large adverse'.

## Ecology

The Authority is concerned about the land take within the Natural Zone (and land of similar quality) for the Scheme. This is identified under Section 3 of the Wildlife and Countryside (Amendment) Act 1985 as moorland which, is particularly important to conserve. The loss of approximately three hectares of heather / bilberry moorland (a UK Biodiversity Action Plan Priority habitat) at Holybank Quarry, fragmentation of the remainder and associated loss of localised invertebrate populations (including one candidate UK Biodiversity Action Plan Priority species) are of significant concern. This loss of and damage to existing heathland and heath / grass / rocky habitat mosaics is not adequately compensated for, either in terms of quantity or quality. The revised Environmental Statement quantifies the habitat loss and compensatory creation, but no additional compensatory habitat creation is proposed. There would therefore be a net loss of at least 1.7 hectares of moorland habitat. Notwithstanding the revised reduced predictions of traffic growth, emissions of Nitrous Oxides in particular are of significant concern to officers due to the resulting deposition of Nitrogen. The potential effects of increased air pollution on the internationally important heathland and blanket bog habitats of the SAC and SSSI are of major concern given the limitations of the air quality predictions discussed elsewhere in this response.

The Draft Orders identify four areas of “Exchange Land” to be used for landscaping and as compensation for loss of CRoW open access land. No ecological survey or appraisal of this land appears to have been carried out, nor are land management options for these areas set out.

Concerns remain about the impacts of the Scheme on bats (European Protected Species), which are likely to be affected by direct destruction of roosting sites and substantial areas of associated sheltered feeding areas. Proposed mitigation measures have been improved but are still considered inadequate.

In addition, if there was pressure in future to further upgrade the A628 corridor this would almost inevitably result in significant adverse impacts on the SAC/SPA/SSSI area.

#### Plans & Policies - PPS7: Sustainable Development in Rural Areas

This states that major developments should not take place in National Parks (or other nationally designated landscape area), except in exceptional circumstances. It goes on to say that applications for all such developments should be subject to the most rigorous examination and proposals should be demonstrated to be in the public interest before being allowed to proceed. There is disagreement with the Highways Agency’s assessment of this policy in relation to the Scheme; that it has an ‘adverse’ impact on the policy. However, there is disagreement with some of the ‘exceptional circumstances’ provided by the Highways Agency.

It is recognised that the element headed ‘*The inclusion of the Scheme in the DfT TPI programme (a national consideration)*’, has been given to illustrate the need for the development, as requested in PPS 7. However, there is a query as to whether the inclusion of the Scheme in the TPI in 2003, based on an assessment carried out in 2000, illustrates that there is still a need for the Scheme in 2007. It is suggested that policy and thinking has moved on since 2000, therefore, an assessment made in 2000 is now out of date.

Secondly, there are concerns over the Highways Agency’s confidence in the fourth exceptional circumstance provided in the Environmental Statement, which reads “*The fact that approval of the Scheme would significantly address the identified congestion, improve local economy and accord with the Government’s transport policy objective of improvement of the UK’s trunk road network*”. This is because, as stated in *A New Deal for Trunk Roads in England – Understanding the New Approach to Appraisal*, new schemes are “...only accepted new schemes where there are serious existing problems, where other options have been explored...”. It is felt that alternatives to a Bypass have not been sufficiently explored, therefore, it is questionable whether the Scheme is in line with Government policy on trunk roads, and thus its validity as an exceptional circumstance.

Thirdly, the seventh exceptional circumstance provided in the Environmental Statement reads “*The fact that the Scheme is the product of extensive investigation and assessment of alternative strategies and routes...*”. This is felt to be an incorrect statement, as all possible alternatives have not been thoroughly examined. It is felt that it is this seventh exceptional circumstance that is key to PPS7 and other Authority policy, as until all alternative options have been fully and fairly assessed, it is not possible to assess whether PPS7 or other related policy is fulfilled or not.

#### Access & Recreation

##### *General points*

As stated in the Environmental Statement, the existing amenity for users of paths crossing the A628 east of Tintwistle and A616 east of Flouch is already poor; the suggested increased traffic flows will reduce amenity further and possibly deter use of the public rights of way including the four national trails. No new safety features are proposed in the extended study area to facilitate road crossings by pedestrians, cyclists or horse riders other than signs, which in themselves have a visual impact. The increased traffic flows will reduce the visual amenity of the area for all users. There is a lack of information on the air quality on paths and trails affected by the Scheme,

and exposure to airborne pollutants is likely to be limited, however there will inevitably be a reduction in the enjoyment of the environment due to a perception of poorer air quality. Similarly for noise and vibration, whose likely increase will reduce enjoyment for walkers, cyclists and horse-riders over a wide area.

Under its second purpose, the National Park Authority has a duty to promote opportunities for healthy outdoor activity, working with partners to increase those opportunities. Increasing emphasis on informal recreation as a means of improving the health of the nation and reducing obesity is well recognised. The Scheme would be likely to act as a disincentive for people to use the public rights of way network and access land adjacent to the A57, A628, A6024 and A616 within the National Park due to difficulty in effecting safe crossings of the highway and a reduced quality of experience.

#### *Main Area of Study*

It is suggested that there will be replacement of 2.1ha of Access Land at Tintwistle Low Moor by 2.2 ha of land elsewhere with equivalent access rights; the location of this has not been identified but the land would need to be of a similar wild nature and attached to existing Access Land.

Rights of way crossings are adequately covered at Tintwistle; however two bridleway crossings of the A628 west of Flouch junction (survey locations 34 and 35) are not, where forecasts indicate a 20% increase in traffic for the proposed Bypass opening year of 2015. These routes provide a link from the car park and facilities at Langsett to the Trans Pennine Trail. As a minimum, advance warning signs should be erected to advise of riders crossing.

#### *Extended Area of Study*

Predicted increase in traffic on the A628 in the opening year is of the order of 34% between Townhead Farm and the A6024 and 20% between the A6024 and Flouch. These figures are less than forecast in the 2006 Draft Orders and the currently moderately severe severance that occurs will remain. On the A616 south of Flouch, where the road is the boundary of the National Park, traffic forecasts are for a 31% increase which it is suggested will alter the currently moderate severance to severe (a slight negative change using the given methodology). This will increase the hazard for users of the car park east of the A616 accessing the popular footpaths in the woodlands at Langsett. Access to Yorkshire Water's car park and the National Park Authority's public toilets at Langsett will be impaired. The highest increase in traffic flows is predicted on the A6024 (94%) which passes through a large area of access land. The recently constructed Northern Horse Route crosses the A6024 close to its junction with the A628; this will present a serious hazard to horse riders. Horse crossing signs are awaited before this route can be officially opened by United Utilities (landowner and developer) however a Pegasus crossing would greatly improve the situation for horse riders.

Other remedial measures that would be desirable to improve the situation for walkers, cyclists and horse riders are, as a minimum, horse crossing signs either side of Highstones Lodge, where the Pennine Way and a concession horse route cross the A628 (similar to proposals at the Dunford Bridge junction). A Pegasus crossing here would also improve safety for users. Also, the development of a replacement section of the Trans Pennine Trail on the northern side of the A628 from Long Side to the Dunford Bridge road, as advocated by the Trans Pennine Trail Office at Barnsley, would remove two crossings of the A628 and improve safety and amenity for users.

Automatic counters on the Trans Pennine Trail indicate that in 2006 44,905 people pa activated a counter at Torside Crossing on the B6105 (27,128 cyclists, 16,133 walkers, 1,644 horse-riders) and 23,243 people were recorded at Dunford Bridge (11,591 cyclists, 10,802 walkers, 850 horse-riders). These counters are either side of the A628, and although numbers of people moving between the two sites is unknown, an indication is given of the popularity of the route. Similarly, estimates for numbers of walkers who complete the Pennine Way (which crosses the A628 at Highstones Lodge) are between 1,000 and 3,500 per annum. The nearest counter in 2006 was at Snake Summit on the A57, which registered 8,579 pedestrians. A counter has recently been

installed on the Pennine Way close to the A628 crossing at Highstones Lodge which it is hoped will provide more information for the Public Inquiry.

### Scheme Objectives

#### Compatibility with WebTAG

There are considerable concerns that some of the Scheme objectives are not inline with WebTAG, as the objectives provided are for a road scheme rather than a transport solution to the specified problem in the villages of Mottram, Hollingworth and Tintwistle. Unit 1, section 1.2.2 of WebTAG states "To be effective, transport appraisal must deal consistently with competing proposals, be even handed across modes and take account of a wide range of effects."<sup>1</sup>. Therefore, the objectives should be mode of transport neutral, rather than with bias towards a certain mode of transport. Unit 2.2, section 1.4.3 states that the local and regional objectives must "...avoid at all costs indications of preferred solutions as these may then cause other better solutions to be overlooked in the process of establishing a strategy or plan.". It is suggested that 'to minimise the impact of the project' is not an objective that can be used for appraisal of all potential options that may provide a solution to the aim of the Scheme.

The fact that some of the Scheme objectives are not in line with WebTAG leads to queries regarding some of the conclusions within the AST, as this assessment is made with reference to the Scheme objectives. Hence some of the AST findings may be questionable. In addition, and possibly more importantly, as the Scheme objectives are for a road based scheme rather than an integrated transport scheme, there is a further query concerning the adequacy of alternatives that have been assessed. It is suggested that as the objectives are biased towards a road scheme, it would be extremely difficult for any non-road scheme to be positively assessed. This heightens fears that the alternatives have not been adequately assessed. It is suggested that the Scheme objectives need to be re-written to remove the road bias, and then all alternatives thoroughly examined utilising the new objectives

#### *Whether the proposed Scheme sufficiently meets objectives*

Notwithstanding the significant concerns regarding the compatibility of the Scheme objectives with WebTAG, there remain concerns regarding the Scheme sufficiently meeting the objectives. As alternatives to a Bypass have not been sufficiently assessed, it is questionable whether the Scheme would sufficiently meet the first element of its overall aim which is to reduce congestion in the three villages to be bypassed. Figures from the Forecasting Report indicate that the Scheme would only achieve a 7% and 17% reduction in traffic flows through Mottram Moor and Hollingworth A628 respectively by 2030, and that there would be a 2% increase at Hollingworth A57. Although it is acknowledged that the Scheme would significantly reduce HGV flows in all three villages, with reductions between 59% and 66% in 2030.

It is not possible to assess whether the Scheme objective of minimising the impact of the project on the National Park has been met. This is because all the alternatives have not been sufficiently examined. Thus, it is not possible to assess whether an alternative measure would provide the same benefits to the three villages to be bypassed without such significant adverse impacts on the National Park.

One reason for the growth in traffic along the A628 would be transfer of traffic from the M62 – traffic flows on this road are forecast to decrease by 1400 vehicles in 2015 with the Scheme, which is a significant volume in relation to total flows on the A628. This runs contrary to the aim stated in the AST, of deterring the transfer of traffic from other cross Pennine routes onto the A628 in the National Park

It is suggested that the Scheme is in line with an element of the SPITS strategy, but is not inline with the strategy as a whole. The Scheme is in line with the eighth element of the strategy, which

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<sup>1</sup> Source: June 1995,

[http://www.webtag.org.uk/webdocuments/1\\_Overview/1\\_Introduction\\_to\\_Transport\\_analysis/index.htm#1\\_2](http://www.webtag.org.uk/webdocuments/1_Overview/1_Introduction_to_Transport_analysis/index.htm#1_2)

is "Improvements to the A57/A628/A616 core trunk road across the National Park" (Page 4 of the SPITS business plan). However, following on from the overarching eight elements, detail is provided regarding what each element encompasses, and contains objectives for each element. It is within these details that the Scheme is not in line with the SPITS business plan as a whole. The first objective within element one of the SPITS business plan is "To reduce traffic levels on the non trunk cross-National Park routes without adverse economic or social impact" (page 5 business plan). The first objective within element four of the plan is "To reduce the overall demand for travel" (page 6 business plan). The first objective within the eighth element is "To make adequate provision for legitimate cross-Park traffic in a way that; furthers National Park purposes and public body duties towards nature conservation" (page 7 business plan). It is questionable how the Scheme reduces the overall demand for travel when predicted traffic increases on the Peak Park screenline are 15% in 2015 and 16% in 2030 when the 'do minimum' and 'do something' scenarios are compared (Figures taken from the Forecasting Report). Moreover, it is suggested that with projected traffic figures on the A628 east of Tintwistle forecast to increase by 34% to 15,800 vehicles (per annum) in 2015 and by 34% to 16,900 vehicles (per annum) in 2030, the Scheme does not further National Park purposes. Thus, the Scheme is only in line with an element of the SPITS strategy, and not the strategy as a whole, as it conflicts with other elements of the strategy. In conclusion if the Scheme conflicts with elements of the SPITS strategy, does this constitute 'supporting' it, as the objective states.

#### Proposed Scheme Alternatives

As the Scheme objectives are for a road based scheme rather than a transport scheme, as stated earlier this raises the question surrounding the adequacy of alternatives that have been assessed. It is suggested that as the Scheme objectives are biased towards a road scheme, it would be extremely difficult for any non-road scheme to be positively assessed. This heightens fears that the alternatives have not been adequately assessed. It is therefore suggested that the Scheme objectives need to be re-written to remove the road bias, and then all alternatives thoroughly examined utilising the new objectives.

Regarding the alternatives that have already been assessed within the Environmental Statement, there are still concerns that these were not fully assessed. Firstly, a lorry ban on the A628 was assessed as an inappropriate solution to the traffic problems but solutions to the traffic issues on the A628 cannot be explored in isolation, as changing this road has implications for the surrounding ones. Secondly, that the public transport alternative that was assessed was not comprehensive. Thirdly, these two alternatives were considered in isolation from each other, whereas it would have been more appropriate to have considered the combined impact of demand management measures together with public transport enhancement, as envisaged in SPITS. Finally, there is an inconsistent treatment of alternative strategies and the preferred strategy.

This concern is extremely significant, as at present it implies non-compliance of the proposed scheme with PPS 7: Development in Rural Areas or GS1: Development in the Peak National Park.

The Highways Agency are currently undertaking some further work on alternatives to the proposed Bypass, as a direct response to one of the objectors to the scheme. It is hoped that revised Scheme objectives can be utilised for this, with the results being made available as soon as possible.

#### Sustainability of the Scheme

Extra route restraint measures have been added to the Scheme in part to reduce the impact of the proposed Bypass on the National Park. However, as the restraint measures are not an integral part of the actual Bypass itself, this raises concerns regarding the future sustainability of the Scheme. As the Scheme would be operating nearly at capacity in its opening year, this would increase pressure for further measures to be put in place soon after the Bypass opens in order to relieve congestion on the Bypass and associated routes. This concern is two fold; firstly, that in

order to gain additional capacity, there would be pressure to alter or remove the route restraint measures, which would lead to traffic levels at approximately the same level as those predicted in the 2006 Draft Orders. This would have a significant adverse impact on the National Park's statutory purposes.

Secondly, there are concerns that there would be future pressure to upgrade the proposed Bypass. This would have further detrimental impacts on the National Park; a large proportion of the route passes through the SAC/SPA/SSSI, and any future measures to upgrade the corridor and associated routes would almost inevitably result in significant adverse direct and indirect impacts to the site, including further land take, increased pollution loads and increased visual and noise disturbance to moorland wildlife. Again, this would have a significant adverse impact on the National Park's statutory purposes.

#### Air Quality

There are concerns that the air quality assessment is biased towards urban areas, and residential properties. It is suggested that this is not appropriate for the extended study area within the National Park, which is a sparsely populated area with high conservation designation. It is also felt that it is inappropriate for the extended study area to include both highly urbanised areas and the rural wilderness of the National Park. The impacts on each area should be judged separately and measured according to different and appropriate criteria.

Little account appears to have been taken of the effects of airborne pollution upon the users of footpaths and trails that either cross or run close to those roads within the Main and Extended Study areas which are predicted to undergo significant increases in traffic flows. It is felt that such footpaths and trails should have been considered as sensitive receptors as described under LAQM PG(03) Guidance.

#### Noise

The possible impacts of traffic noise upon public rights of way have been acknowledged following the additional monitoring and modelling undertaken. However, this has only been conducted in relation to the A628, and that no additional monitoring modelling has been undertaken in relation to the impacts of traffic increase on the A616 and A6024, both of which have adjacent access land and footpaths passing in close proximity to the road, and are predicted to have traffic increases in excess of 25%.

As the distance of the footpath/trail from the road will have a significant impact upon the noise volume, assessing the impact of the Scheme upon a trail at some distance from the road as was carried out could underestimate the potential impacts of the proposed scheme. Therefore, it is suggested that noise levels on some parts of the trails monitored are higher than the levels provided in the Environmental Statement.

#### Methodologies

It is suggested that the procedures and methodologies of the environmental impact assessments are not unalterable. Indeed, Volume 11 of the Design Manual for Roads and Bridges is currently being reviewed, which implies that there is scope for using different forms/methods of assessment. At present, the assessment methodologies do not adequately take account of the Peak District National Park's special qualities, and are tailored to assessment within an urban environment or townscape, which is completely inappropriate for a National Park setting. Secondly, it would appear that some of the methods used to assess the impacts of the Scheme are based on a tally system, this is of particular concern when making qualitative judgements. The results of this approach are that the benefits to one area are cancelled by the disbenefits to another.

### Cultural Heritage

There are concerns about the credibility of the data used in the Cultural Heritage section, as there has not yet been direct discussion over archaeological mitigation and there is an absence of some details of archaeological fieldwork. Therefore, it is suggested that the Cultural Heritage Assessment, which informs the Environmental Statement, is inadequate.

### Geology and Soils

The presence of Japanese Knotweed and Himalayan Balsam within the study area (outside the National Park) is noted. This highlights the importance of proper disposal of soils which could be contaminated with these invasive species, to avoid the risk of their spread. Furthermore, there are some minor concerns that, as yet, no formal contamination survey has been conducted at the New Hobson Moor Road junction.

### Road Safety and Route Restraint Measures

There are concerns about the safety measures proposed for 28 accident cluster sites and the corridor as a whole. This concern is two fold; firstly, the Bypass is not expected to open until 2015, which is eight years away and there is a predicted increase of around 20% in traffic flows during that time, with associated accident implications. It is suggested that it would be appropriate to implement some of these measures in advance of the Bypass, and thus begin to increase the safety of existing users of the road. In addition, some of the safety measures might act as a deterrent for some of the existing traffic using the A57/A628 corridor, as the measures may increase the journey time for those travelling through the National Park.

Secondly, there are concerns that as the safety and route restraint measures are being proposed as part of the Bypass, they are masking the significant adverse impacts of the Scheme. Having thoroughly assessed both the 2006 and the 2007 Draft Orders, it is clear that the 2007 proposals appear to provide less disbenefits to the National Park and road network as a whole than the 2006 proposals because the safety measures are reducing the impact of the Bypass on the National Park. Without these safety and route restraint measures, the adverse impacts of the Bypass on traffic flows, tranquillity, air quality, and safety are far greater than as outlined in the 2007 Draft Orders.

It is felt that the Highways Agency should begin to implement the speed reductions and safety measures now. This would result in a reduction in traffic within the villages of Mottram, Hollingworth and Tintwistle, as well as a reduction in cross-Park traffic, leading to a reduction in congestion, an improvement in air quality, and an improvement in safety within the villages, which are the issues the Bypass is designed to overcome. Furthermore, if these measures were implemented now, they would become part of the 'do minimum' scenario, and thus any further Environmental Statement for the Bypass would illustrate all impacts of the Bypass only on the environment.

### Disruption due to Construction

#### *On traffic*

Although the effects of construction will not be permanent, they will have an impact on the National Park for approximately two years. There are concerns about the significant increase in traffic along the A57/A628 corridor during the construction period. This figure is forecast as less than a 25% increase in traffic, however, it would have an adverse impact upon the National Park, in terms of visual intrusion and tranquillity. Furthermore, there are concerns regarding a general increase in traffic congestion due to the proposed road closures and temporary road closures.

#### *On landscape*

There are concerns that the landscape impacts of the construction phase would be significantly adverse on the National Park. The proposed temporary access roads, moving and parked vehicles associated with the construction and construction plants would all have a significant adverse visual impact on the National Park. The additional light pollution from construction works and noise pollution from vehicles and machinery would have significant on visual and tranquillity



impacts on the National Park. The stockpiled materials and structures, especially topsoil, subsoil and stone / aggregate would be highly visible. Furthermore, proposed temporary fencing around construction areas would have an adverse visual impact, and necessitate extra land take compared to final occupation by the proposed Bypass. These impacts are in relation to elements within the National Park itself and those outside the boundary but would be visible from the National Park.

The conclusion within the Environmental Statement that the proposed construction works would lead to a “temporary decline in its ‘setting’” with regard to Tintwistle Conservation Area is somewhat of an understatement. There is no doubt that an engineering construction operation of this scale would have an enormous impact on the local landscape and would clearly detract from inward views of the northern slopes of the Longdendale valley.