

Trans Pennine Upgrade Public Consultation – Authority Response

Trans Pennine Upgrade Public Consultation (February 2018)

Response on behalf of the Peak District National Park Authority

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

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

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

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

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

Our main focus is on the Preliminary Environmental Information Report. We have some concerns about the lack of information provided within this report; for example there is no clear traffic flow information. As the wider impacts of the scheme beyond the red line boundary relate to traffic flows and how they affect air quality, noise and vibration etc, it is difficult to make an objective assessment of the effects of the scheme.

We understand the reasoning behind the scheme; to improve conditions for residents within the Mottram Moor and Woolley Bridge areas. Unfortunately, the lack of information makes it difficult for the National Park Authority to support the proposed scheme in light of the potential impacts across the National Park and in particular within Tintwistle, and along the A628 and A57 corridors. The timely provision of such information, ahead of, or as part of the public consultation process, may have allayed such concerns.

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

Background information on the Peak District National Park

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

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

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

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

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

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

Page 4 – Why is the scheme needed?

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

It is noted that under the Environment objective, there is a commitment to design the scheme *“to avoid the unacceptable impacts on the natural environment and landscape in the Peak District National Park”*. This undertaking is welcomed; however it should be noted that due to the lack of available information with regard to traffic flows, it is difficult to assess the wider impacts of the scheme on the National Park.

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

We are pleased to see the intention to provide improved facilities, for example a combined cycleway and footpath. It is suggested the aim should be to provide high quality sustainable travel facilities that encourage modal shift of travel behaviour, as an integral part of the upgrade. Where possible, the delivery of segregated facilities proves most effective in encouraging new walking and cycling trips.

The plan indicates the severance and diversion of the Trans-Pennine Trail. As this is a National Trail of some importance, we would hope that this is not the case. We would expect design considerations to be developed in conjunction with the appropriate Trail bodies, to provide high quality enhancement and the safe segregation of the Trail and its users from the new road network (including during construction). The upgrade and promotion of the local sections of the Pennine Bridleway and Trans-Pennine Trail would help to give the communities of Mottram, Hollingworth and Glossopdale a renewed sense of advantage from their close proximity and onward connection to the Peak District National Park.

Please note; it is quite an involved process to search out the details of suggested locations of these improvements from the webpage provided in the response form. A separate plan showing these facilities would be helpful.

Benefits and impacts of the link roads (Page 8)

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

Page 9 – Safety and Technology improvements

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

The proposals are for a package of measures, including highly reflective road markings, skid resistant surfaces and automated snow gates. Their location would be within, or close to, the boundary of the Peak District National Park. The design and siting of the safety and technology improvements will be of critical importance, given their potential to impact upon the setting of the National Park and its special qualities.

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

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

Preliminary Environmental Information Report (February 2018)

Introduction

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

General Comments

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

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

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

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

Detailed Comments

Chapter 2 – The Scheme

2.1 Background to the scheme

Paragraph 2.1.2 (Page 4) refers to the postponement of the ‘A628 Climbing Lanes’ scheme to allow further consideration of the benefits associated with them. It is worth noting that the Peak District National Park Authority formally objected to the ‘A628 Climbing Lanes’ scheme in April 2017. The basis of this objection centred upon the impacts of the scheme on the National Park, including particular sensitive landscape and habitat designations. The objection was also in reference to the apparent piecemeal approach to bringing forward proposals for the whole corridor rather than taking a holistic approach.

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

2.2 Scheme objectives

Paragraph 2.2.1 (Page 5) suggests that *“the scheme is also being designed to avoid unacceptable impacts on the natural environment and landscape in the Peak District National Park”*. We welcome this statement, and look forward to working with Highways England to address some of the concerns expressed within this document.

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

2.8 Highways lighting

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

2.16 Environmental design

Paragraph 2.16.2 (Page 12) refers to the use of earth mounding or acoustic fencing to provide screening from increased noise levels resulting from the scheme. Some thought will need to be given to ensuring natural looking landforms, in keeping with the existing setting. Where planting is proposed, this should utilise appropriate and locally sourced local species.

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

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

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

It is slightly unclear what is meant by this, but the assumption would be that food sources would be better away from the edge of the road than nearer to it?

Chapter 3 – Assessment of Alternatives

3.2 Reasonable alternatives studied

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

Chapter 4 – Environmental Assessment Methodology

Table 4-1 (Pages 26 and 27) refers to five Public Consultation Events from Saturday 18th March to Saturday 1st April; however, no year is given. It is assumed that these were the events from 2017, but it may be worth offering this information so that the table is consistent.

Chapter 5 – Air Quality

5.1 Existing environmental conditions

Paragraph 5.1.6 and Table 5-1 (Pages 30 to 32) provides the detail of the location of sensitive receptors to Air Quality. The table does not contain any sensitive receptors located within the Peak District village of Tintwistle. Whilst this report does not contain any traffic modelling figures, thus making it difficult to easily assess future impact, it is extremely likely that the scheme will increase traffic flows along the A628 through Tintwistle. The modelling data that has been provided so far in discussions with Highways England and Arcadis would suggest an increase in traffic flows along the A628 through Tintwistle in the order of 1,200 vehicles¹. This model suggests that the proportion of HGV traffic will remain the same, effectively an increase in HGV numbers overall. Whilst there may be freer-flowing conditions through the village as a result of the scheme, it is our understanding that much of the air quality impacts within the village are as a result of low gear running of HGVs either climbing eastwards or braking during descent westwards.

It is important that the full impacts of the scheme both positive and negative for the wider area are fully understood. The inclusion of sensitive receptors within the village of Tintwistle along with appropriate assessment of air quality impacts would be welcomed.

Similarly, the A57 Snake Pass is expected to see a 27% increase in traffic, equating to an additional 1,200 vehicles per year. There are currently three sensitive receptors located within the National Park along this route (R52, R53 and R54). The inclusion of these receptors is acknowledged and welcomed. However we would suggest the inclusion of other roadside receptors would be appropriate, including the Snake Pass Inn and Ladybower Inn. Both of these premises are in close proximity to the road and have seating areas facing the road.

Paragraph 5.1.7 (Page 32); the inclusion of the ecological receptors; South Pennine Moors Special Area of Conservation (SAC); Peak District Moors Special Protection Area (SPA); and Dark Peak Site of Special Scientific Interest (SSSI) is welcomed. Traffic flows are predicted to increase by approximately

¹ I believe that this figure is based on an Annual Average Daily Total Fixed Demand flow

1,200 vehicles along those parts of the A628 and A57 covered by these designations. Therefore, it is important that consideration to air quality impacts on them covers the same area. This would constitute the A628 and A57 corridors through the National Park. Because the traffic modelling information that has been supplied thus far indicates a significant increase in percentage traffic flows on the A6024 Holme Moss road, this road should also be considered in relation to traffic related air quality assessment.

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

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

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

5.3 Potential effects and mitigation measures

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

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

Figure 5.4 is referred to within this paragraph as showing the Affected Road Network in relation to Air Quality. There appears to be a significant gap, in that the A628 across the National Park is not included. As the modelled data, which the Authority has been privy to thus far indicates an increase in traffic of 1,200 vehicles AADT including an increase of 152 HGVs per day, this road should be included. The road passes through the South Pennine Moors Special Area of Conservation (SAC); Peak District Moors Special Protection Area (SPA); and Dark Peak Site of Special Scientific Interest (SSSI). An assessment of impact on these designated areas would be welcomed.

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

Similarly, it is anticipated that the increased cross-park flows will have an impact on traffic flows on the A616 Trunk Road. Langsett village which lies on the boundary of the National Park is already within an Air Quality Management Area. An assessment of air quality impacts resulting from the scheme at this location should form part of the Environmental Statement despite the distance of Langsett from Mottram, because it forms part of the same Southern Pennines Strategic Road Network route.

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

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

Chapter 6 – Cultural Heritage

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

Conservation Areas

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

Listed Buildings:

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

Wider context:

- k) Crowden Bridge 200 yards north-west to Crowden Old Vicarage (LEN 1203942);
- l) Milestone approximately 400m east of Lady Cross on Old Salt Road (LEN 1151102);
- m) Lady Cross, approximately 1000m south-west of junction with Windleden Lane on Old Salt Road (LEN 1151101);
- n) Milestone approximately 200m west of Flouch Inn, Woodhead Road (LEN 1151083);
- o) Milestone approximately 300m north of Flouch Inn, Whams Road (LEN 1315028);
- p) Langsett House (south part), Langsett (LEN 1315060); and
- q) The Farm House, Langsett (House immediately east of Langsett House)(LEN 1151082).

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

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

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

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

6.3 Potential effects and mitigation measures

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

Chapter 7 – Biodiversity

General

We are mindful that none of the actual physical works involved in the construction of the proposed highway will fall within the National Park boundary, there are, however, cumulative affects impacting on the National Park caused by the predicted increase in traffic along the A628, A57 (Snake Pass) and the A6024 (Holme Moss Road) within the National Park.

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

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

7.1 Existing environmental conditions

Paragraph 7.1.18 (Page 46); notes that whilst the scheme falls within the Impact Risk Zones (IRZs) for the Dark Peak SSSI, the IRZ does not list transport proposals (including roads) as a potential impact at this distance. We feel that this development still poses a risk due to the increased traffic as mentioned above, which is likely to lead to the following residual effects: -

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

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

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

7.3 Potential effects and mitigation measures

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

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

In addition, the mitigation section of Table 7-1 provides no clear commitment to completing the Habitats Regulations Assessment and associated mitigation. This needs to be provided in the final Environmental Statement to provide a clear steer for the mitigation required. Also, the potential effects on non-qualifying species associated within the SSSI (e.g. Section 41 species mountain hare) are identified during construction and operational phases, but there is no mitigation relating to these at either phase. This information needs to be provided in the Environmental Statement.

Chapter 8 – Landscape and Townscape

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

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

8.3 Potential effects and mitigation measures

Table 8-3 (Pages 68 to 81)

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

At present, there are no viewpoints from the any of the national trails or the National Park. We would recommend their inclusion, particularly from viewpoints within the national Park towards the scheme and from viewpoints down onto crossings of the A57 Snake Pass and A628 (T) from the National Trails.

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

Chapter 9 – People and Communities

9.1 Existing environmental conditions

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

Induced traffic flows from operation of the Scheme (with Highways England early estimates of an 8% increase for the A628 and 9% increase for the A57) could amplify the current adverse effects from traffic travelling through Glossop and Tintwistle, including the Tintwistle Conservation Area. The close proximity of Glossop and Tintwistle compels the need to include them in measures to mitigate the predicted transference of traffic and air quality issues to these communities.

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

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

Taking this further, whilst we recognise that this is a road scheme, we think the balance is weighted too heavily in favour of the motorist. The eventual scheme should strike a balance through the delivery of local modal shift opportunities, encouraging sustainable travel as part of its environmental impact mitigation measures.

Paragraphs 9.1.12 and 9.1.13 (Page 83) refer to severance of the Pennine Bridleway and Trans Pennine Trail routes by the proposed scheme. Given the National Status of these routes and the benefits that they offer, it is important that this impact is mitigated through the provision of crossing facilities of some type.

The scheme area is crossed by long distance trails which afford access to the Peak District National Park. The Pennine Bridleway National Trail (locally incorporating the Trans-Pennine Trail National Cycle Route 62), is available to horse riders, cyclists and walkers. The route currently includes a road crossing in close proximity to the proposed junction of the A57 Link Road and existing A57 at Woolley Moor. We would expect design considerations to be developed in conjunction with the appropriate Trail bodies, to provide the safe segregation of the Trail and its users from the new road network (including during construction). Highways England has the opportunity to deliver and showcase high quality landscape restoration and enhancement for the Pennine Bridleway National Trail with appropriate visual and noise screening and proposals for habitat enrichment.

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

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

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

9.3 Potential effects and mitigation measures

Paragraph 9.3.2 (Page 85) refers to the fact that assessment of potential effects is ongoing, with further detailed assessment to be provided within the Environmental Statement. By the time of the publication of the Environmental Statement the public consultation will have ended. This means that responders to the consultation are being asked to comment on the scheme without being fully appraised of the implications of that scheme. This makes it difficult to provide meaningful comment.

Access Land

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

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

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

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

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

The proposal to increase traffic flows on the roads crossing these significant areas of Access Land will have a detrimental impact on the public's enjoyment of these special areas by increasing noise and visual intrusion to a wide area in an otherwise wild and tranquil location. Both roads are visible from a wide area and impact on the enjoyment of a large proportion of the most wild and remote parts of the Dark Peak area.

Rights Of Way

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

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

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

If the proposals go ahead, it will be important to consider traffic-flow at the road crossings for all these important and popular trails to ensure they can be used safely.

Crowden Car Park

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

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

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

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

Chapter 10 – Noise and Vibration

10.1 Existing environmental conditions

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

Paragraph 10.1.5 (Page 91) refers to the 'other sensitive receptors within the Study area, which are represented in Figure 10.1. Because of the expected increase in traffic beyond the immediate vicinity of the scheme, we would wish there to be wider consideration of the impacts of the scheme. The expected increases in traffic (1,200 vehicles AADT including an increase of 152 HGVs per day) along the A628, including through the village of Tintwistle would suggest that the scheme will result in a fairly significant increase in noise. Similarly, bearing in mind the reference within paragraph 10.1.4, we would expect to see some recognition of the potential noise impacts on the South Pennine Moors Special Area of Conservation (SAC); Peak District Moors Special Protection Area (SPA); and Dark Peak Site of Special Scientific Interest (SSSI). This is particularly pertinent bearing in mind some of the potential operational impacts referred to within Table 7.1 on these designated areas.

It has been suggested that traffic flows will also increase on the A57 Snake Pass (an increase of 1,200 vehicles) and the A6024, both of which pass through the South Pennine Moors Special Area of Conservation (SAC); Peak District Moors Special Protection Area (SPA); and Dark Peak Site of Special Scientific Interest (SSSI). It is not unreasonable to suppose that this will lead to an increase in traffic noise with the same potential effects described within Table 7-1.

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

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

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

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

10.2 Other baseline information to be obtained / surveys undertaken

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

Chapter 11 – Road Drainage and the Water Environment

General

We note the revised road junction layout where the proposed A57 link road meets the current A57 at Woolley Moor, with a signal controlled junction replacing the previously proposed roundabout. This approach reduces the potential for obstruction within the River Etherow flood zone.

Chapter 12 – Geology and Soils

12.1 Existing environmental conditions

Paragraphs 12.1.27 and 12.128; Table 12-2 (Page 108) refer to the existing recorded landfill sites within the Study Area. It is acknowledged that these sites could pose a threat to sensitive receptors. It is also possible that there are other unknown areas of contaminated land. Because of the distance from the National Park boundary, it is unlikely that these sites would impact on the National Park. However, under dry windy conditions it is possible that contaminated material from these sites could be carried westwards by the prevailing winds into the surrounding built up areas including Tintwistle. It is also possible for contaminated soil to be carried out of the area on the wheels or other parts of vehicles exiting the site. Therefore it is important that all measures are taken to ensure that any contaminated soils are contained within the compound and dealt with in-situ where possible. Where it is not possible to do so, the transport of the contaminated soils should not allow for any cross-contamination.

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

12.3 Potential effects and mitigation measures

Paragraph 12.3.2 (Page 109) refers to the opportunity offered by the cutting to become a learning resource for geology students during the lifetime of the scheme. This is a positive outcome, but would necessitate easy safe access to the site on foot, in order to maximise this potential.

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

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

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

Chapter 13 – Materials

General

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

13.1 Existing environmental conditions

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

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

13.3 Potential effects and mitigation measures

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

The table also refers to the treatment of hazardous waste (please see comments above in relation to Geology and Soils. In order to fully avoid further potential contamination, the treatment of contaminated soil on site would be preferable. Where it is to be transported off-site, it should be under strict control to avoid any cross contamination. This is particularly important for any vehicles crossing the National Park, due to the extremely sensitive nature of the moorland and water course environments.

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

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

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

Chapter 14 – Climate

14.3 Potential effects and mitigation measures

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

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

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

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

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

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

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

Chapter 15 – Assessment of Cumulative Effects

15.1 Methodology

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

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

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

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

15.2 Assessment of intra-scheme effects

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

Glossary

Page 153 – Stakeholder appears twice

Page 154 – Statutory Consultees appears twice

Summary of response

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

In particular we are concerned about the impacts of increased traffic flows through the National Park villages of Tintwistle and Mottram. Both of these villages are already also blighted by the impacts of traffic including air quality, noise and severance.

We are also concerned about the impacts on the wider Peak District including on the South Pennine Moors Special Area of Conservation (SAC); Peak District Moors Special Protection Area (SPA); and Dark Peak Site of Special Scientific Interest (SSSI). However it is exceedingly difficult to quantify these concerns without the appropriate information. In this case the lack of traffic flow modelling has compromised our ability to properly respond to this consultation and has engendered a very cautious assessment of potential impacts.

Finally, we are concerned that the issues that will result from the delivery of the scheme will undoubtedly bring more pressure to bear to address the need for a further bypass around Hollingworth and Tintwistle, with the requirement for road building within the National Park