## 10. A57 LINK ROADS SCHEME (TN)

# 1. Purpose of the report

To inform Members about the progress of the National Highways A57 Link Roads Scheme; to inform Members about the Local Impact Report submitted by the Authority in response to the scheme and to seek a decision from Members on the Authority's current Holding Objection to the scheme.

### **Key Issues**

- The proposed A57 Link Roads scheme lies wholly outside of the Peak District National Park boundary. The primary aim of the scheme is to relieve congestion and the effects of road traffic on the residents of Mottram and Woolley Bridge
- In its opening year, delivery of the scheme is predicted to substantially increase traffic flows on the A628 Trunk Road and the A57 Snake Pass within the National Park; it also leads to increased traffic flows on the A6024 Holme Moss road and Monk's Road. The scheme leads to a small reduction in traffic flows on the B6015 Woodhead Rd and the A624 Glossop to Little Hayfield road.
- The scheme is predicted to significantly increase traffic flows through Tintwistle.
- The effects of the scheme on the National Park are primarily 'indirect effects' resulting from the increased traffic flows on National Park roads. Where these adverse effects have been assessed within the Environmental Statement they have been described as slight and scoped out.
- The increase in traffic flows along the A628 corridor do not meet the threshold for full assessment under the guidance, so the effects have been scoped out.
- The Peak District National Park Authority has submitted two holding objections to the proposed scheme, which are still extant.

## 2. Recommendations

- 1. That Members endorse the submitted Local Impact Report at Appendix 1.
- 2. That Members support officer attendance at the Hearing Meetings.
- 3. That Members formalise the current holding objection to a full objection on the basis of the unacceptable impacts of the scheme on the Special Qualities of the National Park.

How does this contribute to our policies and legal obligations?

## 3. National Planning Policy Framework (2021)

Paragraph 176 of the National Planning Policy Framework (2021) sets great weight on *"conserving and enhancing landscape and scenic beauty in National Parks"*, going on to state: -

"The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas."

Paragraph 177 goes on to make a presumption against major development in National

Parks, and goes on to clarify that: -

"whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined."

Whilst, in this instance, the National Park Authority is not the decision maker, we do have a role to play is assessing impact on the Peak District National Park and its special qualities.

### Peak District National Park Core Strategy (2011)

The Peak District National Park Core Strategy (2011) sets out the strategic planning policies for the whole area of the National Park. Chapter 7 sets out the General Spatial Policies for the National Park. GSP 1: Securing national park purposes and sustainable development sets out the following approach: -

"Policy GSP1 seeks that any development proposal will comply with core policies so that any development in the National Park must satisfy the statutory purposes of national park designation."

Chapter 9: Landscapes and conservation sets out the Authority's strategic policies for landscape. Part A of Policy L1: Landscape character and valued characteristics states:

"Development must conserve and enhance valued landscape character, as identified in the Landscape Strategy and Action Plan, and other valued characteristics."

Where development is proposed outside of the National Park, but with a negative effect on the National Park, Policy L1A is considered in developing a response to that proposed development.

Chapter 15: Accessibility, travel and traffic sets out the Authority's position in relation to the delivery of new road schemes either within or effecting the National Park. Core Strategy Policy T1: Reducing the general need to travel and encouraging sustainable transport sets out a high-level ambition for transport within the National Park. Of particular relevance are parts B, C and E of the policy: -

- B. Cross-Park traffic will be deterred.
- C. Modal shift to sustainable transport will be encouraged.
- E. Impacts of traffic within environmentally sensitive locations will be minimised.

Core Strategy Policy T2: Reducing and directing traffic provides the Authority's strategic approach to road-building within the National Park, with parts A, B and C being of particular relevance: -

- A. Transport developments, including traffic management schemes, which reduce the amount of cross-Park traffic, will be supported if they can be accommodated without adverse impact on the National Park's valued characteristics. Transport developments which increase the amount of cross-Park traffic or have other adverse effects on its setting and character, amenity and enjoyment will be opposed.
- B. In exceptional circumstances, transport developments (including expansion of capacity, widening or a new route) that increase the amount of cross-Park traffic may be accepted where: there is a demonstrable long-term net environmental

benefit within the National Park;

C. No new road schemes will be permitted unless they provide access to new businesses or housing development or there are exceptional circumstances. Those road schemes (including improvements) that fall outside of the Planning Authority's direct jurisdiction will be strongly resisted except in exceptional circumstances.

## Peak District National Park Development Management Policies (2019)

The Peak District National Park Development Management Policies (2019)<sup>1</sup> document provides detailed polices that underpin the Core Strategy. Chapter 9: Travel and transport includes two policies dealing with road building within the National Park.

Development Management Policy DMT1: Cross park roads offers clarity to Core Strategy Policy T2 by providing the criteria by which transport developments that increase cross-Park traffic might be acceptable. The policy states: -

New roads for cross-Park travel will not be supported, and proposals for a major alteration to an existing road will not be permitted, unless:

- (i) there is a compelling national need which cannot be met by any reasonable alternative means; and
- (ii) it is demonstrated to be in the overall public interest; and
- (iii) it is demonstrated to provide long term local transport benefit; and
- (iv) there is a demonstrable long-term net environmental benefit within the National Park; and
- (v) there is a demonstrable long-term net economic benefit for the National Park.

## **Background Information**

## 4. The Scheme

The proposed National Highways A57 Link Roads scheme is the latest to be proposed to address longstanding issues of congestion in and around the Longdendale villages of Mottram and Tintwistle.

A previously proposed scheme for a bypass of Mottram, Hollingworth and Tintwistle was brought forward in 2003, resulting in a Public Inquiry in 2007. The scheme included road building within the National Park and was forecast to significantly increase traffic flows across the A628. The Peak District National Park Authority formally objected to the scheme on the grounds of its impact on the National Park. The scheme was formerly withdrawn by Highways England in 2009 following a long delay to the Inquiry related to errors in traffic modelling.

In September 2015, the Department for Transport commissioned a study aimed at identifying options for future investment on Trans-Pennine routes to improve connectivity between Manchester and Sheffield. Along with longer-term consideration for whole route options, an assessment was made in relation to the congestion issues of the Longdendale villages. The favoured option was for two relief road schemes to divert

<sup>&</sup>lt;sup>1</sup> Webpage-Final-Branded-DMP-Doc-Copy.pdf (peakdistrict.gov.uk)

traffic from the existing A57(T) at Mottram Moor and from the A57 at Woolley Bridge.

In the development of the scheme, Highways England identified the following key transport objective: -

"environmental – avoiding unacceptable impacts on the natural environment and landscape in the Peak District National Park, and optimising environmental opportunities"<sup>2</sup>

At this stage, the scheme was referred to as the Trans Pennine Upgrade Programme and included two eastbound climbing lanes within the National Park boundary, upgrades to the Westwood Roundabout and safety and technology measures across the route. The climbing lanes were subsequently removed from the programme. The Highways England Trans Pennine Upgrade Programme underwent a statutory public consultation in February to March 2018. The National Park Authority submitted a holding objection approved by the Authority on the basis of there being insufficient information upon which to assess the scheme's impact on the National Park.

Following the public consultation, Highways England paused the scheme and a decision was taken to deliver the Westwood Roundabout and safety and technology measures separately and in advance of the relief roads.

Following some amendments to the scheme, Highways England undertook a further public consultation in November and December 2020. The Peak District National Park Authority submitted a further holding objection on the basis of there being insufficient information upon which to assess the scheme's impact on the National Park. Owing to the timing of the consultations and the Authority calendar, this holding objection was submitted with the agreement of the Director of Conservation & Planning and the Chair and Vice Chair of the Authority.

Highways England submitted the Development Consent Application to Highways England in the summer of 2021. An Examining Authority was appointed and the Examination formerly opened on 17<sup>th</sup> November 2021. The Examining Authority has been given a six-month timescale for the Examination, which is due to end in May 2022.

The Peak District National Park Authority was formally invited to produce a Local Impact Report on 19<sup>th</sup> November with a deadline of Friday 14<sup>th</sup> January 2022. The Local Impact Report was submitted on Friday 14<sup>th</sup> January 2022 and forms Appendix 1 to this report. The initial issue specific hearings of the Examination are scheduled for the week commencing 7<sup>th</sup> February 2022.

The Campaign for the Protection of Rural England has submitted an alternative solution to the A57 Link Roads Scheme as part of its representation to the Planning Inspectorate. The web-links to the approppriate documents on the Planning Inspectorate website have been circulated to Members for information.

## Predicted effects of the scheme

## Traffic flows

The A57 Link Roads Scheme Peak District National Park Local Impact Report focusses on the effects of the proposed scheme on the National Park. These effects are largely due to changes in traffic flows as a result of the scheme. These effects are considered to be indirect because they are not directly related to the actual scheme. However,

<sup>&</sup>lt;sup>2</sup> A57 Link Roads TR010034 6.3 Environmental Statement Chapters 1-4, Paragraph 2.2.1 Chapters 1-4 Introductory Chapters

because of the national and international importance of the Peak District, its special qualities and its ecological designations, great weight should be given to these effects.

The traffic modelling for the scheme provides a comparison of traffic flows without the scheme (Do Minimum), with traffic flows with the scheme (Do Something) for the opening year (2025) and the Design Year (2040). Appendix 2 shows the effect of the scheme on traffic flows on Peak District roads for both timeframes (the figures are for Annual Average Daily Traffic (AADT)).

## A628(T)

With the scheme, the A628(T) is predicted to see a daily increase in traffic of between 850 and 950 vehicles across the Peak District in 2025 compared to without the scheme. The figures vary depending on the section of the road, with the highest increase of 950 (+9%) vehicles being the westernmost section from the junction with the B605. The other sections see a 7% increase in flows, with the central section between the B605 and A624 junctions seeing a daily total of 14,000 vehicles with the scheme in 2025. The proportion of HGV traffic varies between 13 and 14%, with a slight decrease in numbers of HGVs along the eastern section of the route.

By the design year (2040), the daily traffic totals with the scheme are between 900 and 1,100 higher than without the scheme. Again, the highest increase of 1,100 vehicles is on the western section and equates to a 10% increase compared to without the scheme. The other sections see a 7% increase in flows, with the central section between the B605 and A624 junctions seeing a daily total of 15,650 vehicles with the scheme in 2040. The proportion of HGV traffic remains constant between the two scenarios varies between 11 and 13%, with an increase in numbers of 108 to 153 HGVs per day over the 'Do Minimum' scenario.

## A57 Snake Pass

With the scheme, the A57 Snake Pass is predicted to see a daily increase in traffic of approximately 1,150 (+38%) vehicles across the Peak District in 2025 compared to without the scheme. The predicted overall daily total of HGVs remains low (42), but this represents a 36% increase in their number compared to without the scheme.

By the design year (2040), the daily traffic totals with the scheme are 1,450 higher than without the scheme; again a 38% increase. The predicted overall daily total of HGVs remains low (53), but this represents a 36% increase in their number compared to without the scheme.

## A624 Glossop to Little Hayfield

With the scheme, the A624 Glossop to Little Hayfield road is predicted to see a daily decrease in traffic of 100 vehicles (-1%) vehicles across the Peak District in 2025 compared to without the scheme. The proportion of HGV traffic is however predicted to increase from 3% to 4%; equating to an increase in numbers of 92 HGVs per day (a 32% increase in the total number per day).

By the design year (2040), the daily traffic totals with the scheme are 600 lower than without the scheme; a 5% decrease. The proportion of HGV traffic is however predicted to increase from 3% to 4%; equating to an increase in numbers of 100 HGVs per day (a 27% increase in the total number per day).

#### A6024 Holme Moss

With the scheme, the A6024 Holme Moss road is predicted to see a daily increase in traffic of 100 vehicles (+14%) vehicles across the Peak District in 2025 compared to without the scheme. The traffic model indicates that no HGV traffic will use this route.

By the design year (2040), the daily traffic totals with the scheme are 50 higher than without the scheme; a 6% increase. The traffic model indicates that no HGV traffic will use this route.

## B6015 Woodhead Road

With the scheme, the B6015 Woodhead road is predicted to see a daily decrease in traffic of 50 vehicles (-2%) vehicles across the Peak District in 2025 compared to without the scheme. The proportion of HGV traffic is predicted to remain constant at 5%. This equates to a decrease in numbers of -2 (a -2% decrease) per day.

By the design year (2040), the daily traffic totals with the scheme are 200 lower than without the scheme; a 6% decrease. The proportion of HGV traffic is predicted to decrease from 5% to 4%; equating to a decrease in numbers of 45 HGVs per day (a 25% decrease in the total number per day).

## Monks' Road

Monks' Road was not included in the modelled date submitted as part of the DCO application. However, Officers of the National Park Authority sought clarity on the effects of the scheme on the route. The data provided by National Highways in response only provided the relative change in vehicle totals with the scheme compared with the 'Do Minimum' scenario. Those figures are: -

- 2025 there is an increase in the AADT of +241 vehicles per day
- 2040 there is an increase in the AADT of +654 vehicles per day

It is unclear what percentage increase is represented by this growth or the proportion of HGV traffic.

## Effects of the traffic flow increase on the special qualities of the National Park

It should be noted that generally, National Highways and their agents consider the effects of the scheme on the National Park to be slight and with one exception (road safety) not to require mitigation.

Whilst the changes in traffic flow appear to be quite large for National Park roads, only the predicted change in flows for A57 Snake Pass road in the opening year has been high enough (+1,000 vehicles per day) to warrant additional assessments as part of the road network affected by the scheme.

In the case of the two roads most affected by changes in traffic flows, the increase in traffic on the A628(T) is only 50 vehicles below this threshold and the road already carries high number of vehicles including a high proportion of HGVs. In this respect, in all likelihood the road is already having a significant negative effect on the special qualities of the National Park and any increase in traffic will worsen this effect.

For the A57 Snake Pass, the existing traffic flows are quite low and the scheme will result in a dramatic increase in flows, albeit to lower levels than on other roads. This sudden and dramatic change is likely to have an equally sudden and dramatic effect on the special qualities of the National Park adjacent to the road.

It should be noted that of the six National Park roads listed above, four see increase in

traffic flows as a result of the scheme and two see decreases. However, on balance the scheme represents a predicted overall increase in traffic flows on National Park roads.

### Air Quality

Tintwistle is currently subject to an Air Quality Management Area (AQMA) within the National Park. The AQMA was declared by High Peak Borough Council in in Tintwistle in 2018 due to exceedances of the annual mean total for nitrous oxides resulting from traffic flow through the village.

This AQMA is still extant, and whilst it is likely that nitrous oxide emissions will improve over time as the overall vehicle fleet changes, the increase in flows through the AQMA are of some concern.

Nitrous oxide emissions are also associated with nitrate enrichment of soil in bands alongside road corridors. Notwithstanding, the anticipated greening of the vehicle fleet, nitrate deposition poses a risk to the nutrient poor soils associated with the SAC / SPA designated habitats and species.

#### **Cultural Heritage**

The increase in traffic through Tintwistle is likely to affect perceptions of the Tintwistle Conservation Area, whilst airborne pollution and traffic vibration may have negative effects on the fabric of buildings adjacent to the A628(T).

Increased traffic flows are also likely to affect people's perceptual experience of cultural heritage adjacent to the A628 and A57 Snake Pass.

#### Landscape and visual

Officers are concerned with how the indirect landscape impacts (increased traffic flow) of the scheme have been assessed. National Policy sets great store in ensuring the road schemes and their effects are thoroughly assessed to avoid or minimise impacts on National Parks. We do not believe that appropriate landscape receptors have been adequately defined at the correct level of detail to determine indirect landscape effects of the scheme (on character and perceptual aspects such as tranquillity, wildness, remoteness etc) within the National Park.

We are also concerned that where negative impacts have been recognised, 'slight adverse' effects are not considered to be material. In the case of a protected landscape we believe that slight adverse effects are a material consideration. We also believe that indirect visual effects are under-assessed. This is particularly pertinent due to the cumulative harm caused by additional traffic loads on top of the existing high levels of traffic through these valleys.

#### Biodiversity

Officers are concerned that increases in air pollution, notably Nitrogen deposition, and the impact of this on Blanket Bog and Upland Heathland habitats within the South Pennine Moors SAC. We note that this potential impact has been scoped out in the Habitats Regulations Assessment as having no likely significant effects on the basis that the predicted traffic increases are below the threshold of 1000 AADT; however, some of the figures are very close to the 1000 AADT figure and we would question what the confidence limits are for those figures. Should the confidence limits mean that the figures could exceed the 1000 AADT threshold, and notwithstanding the predicted improvements in quality of vehicle emissions, then we would suggest that the potential

Nitrogen deposition impact should be factored in as a potential impact warranting further consideration as part of an Appropriate Assessment.

Officers are concerned about the increases in visual and noise disturbance to breeding moorland birds; both the SPA-qualifying species (Short-eared Owl, Merlin, Golden Plover) and the wider range of birds for which the Dark Peak SSSI qualifies, such as Curlew, Snipe and Dunlin. There may also be similar impacts on Mountain Hare- a species of Principal Importance in England and for which the Peak District population is the sole English population. These potential disturbance effects have been scoped out of further consideration on the basis that the roads are already busy. However, no evidence appears to be presented to substantiate that conclusion.

There is research evidence to suggest that both visual and noise disturbance can impact negatively on breeding birds, with some studies suggesting that there may be thresholds of tolerance by different species. No evidence appears to be presented to consider what disturbance thresholds might be relevant to the species concerned; whether the existing levels of disturbance already exceed those tolerances; or whether the predicted traffic increases might push the disturbance levels above key tolerance thresholds. This is particularly the case for the A57 where significant traffic increases of 38% are predicted.

Officers are also concerned about the increase in fire risk associated with higher traffic flows. This has not been scoped into potential factors having a significant effect; however, between 2007-2016 there were 260 recorded wildfires on the Peak District moors. Only 28 of these had causes attributed, of which 1 was specifically attributable to a vehicle and a further 6-7 attributable to discarded cigarettes, a proportion of which may arise from vehicles on roads traversing the moors. So, it is likely that at least 1 wildfire per year on the Peak District moors is attributable to vehicle use. Any increase in traffic volumes; particularly as large as the 38% predicted increase on the A57, is likely to increase the risk of wildfire. We would therefore suggest that the assessment of increased wildfire risk has wrongly been scoped out of having a potential significant impact on Blanket Bog and Upland Heathland habitat in the SAC.

## Noise and vibration

The A628 carries large numbers of vehicles through Tintwistle. The traffic modelling indicates that with the scheme in 2025, there will be 11,650 vehicles passing through Tintwistle (950 vehicles more than in the 'Do Minimum' scenario). HGVs make up 14% of this total (1,631).

This high level of traffic and the percentage of HGVs will have a negative effect on residents of the village of Tintwistle. This will be particularly acute for those properties adjacent to the road and where vehicles are climbing eastwards out of the village. The pedestrians and equestrian crossings within the village, necessary to allow crossing of the A628 exacerbate the situation as motor vehicles are generally noisier in low gears and accelerating; this is particularly the case for diesel engine HGVs.

The quiet enjoyment of the National Park is already affected by existing traffic levels. For users of the high moorland stretch of the Longdendale / Trans Pennine Trail; the noise of traffic on the A628 approaching Longside is audible before the road itself is visible.

Similarly, whilst the A628 is separated from users of the lower section of the Trans Pennine Trail by the width of the valley and the Longdendale valley reservoirs, the road

is still audible; albeit as a distant rumble.

Visitors to the high gritstone edges that parallel the A57 Snake Pass are reminded of the presence of an often not visible road by the sound of traffic. This is particularly the case at weekends when high-revving motorcycle engines often obscure the sounds of birdsong, the breeze or the trickle of water in the cloughs.

Given the existing levels of noise disturbance for visitors to the National Park as described above, it is likely that this nuisance will be become worse. For users of the Trans Pennine / Longdendale Trail adjacent to the A628, traffic noise is already a fairly constant intrusion. The addition of between 850 and 950 additional vehicles per day (2025 Do Something') is likely to reduce the number or length of quieter periods.

For the A57 Snake Pass, the increase in vehicles is more pronounced (1,150 or 38%) with the scheme (2025). It is likely that this will have a more noticeable effect for visitors to the National Park.

#### Severance

There is an extensive rights of way network across the Dark Peak Area of the Peak District National Park. In addition to footpaths and bridleways, the area is crossed by a number of nationally important routes – the Pennine Way, the Pennine Bridleway and the Trans Pennine Trail. These routes cross both the A628 Trunk Roads and the A57 Snake Pass within the National Park. The principle crossing points are: -

- The A628 Trunk Road
  - The Pennine Bridleway crossing point at the eastern edge of Tintwistle
  - The Pennine Way crossing at Torside
  - The Longdendale / Trans Pennine Trail crossings at Woodhead Station, Longside End and Carr Bottom
- The A57 Snake Pass
  - The Pennine Way crossing at Snake Summit

These and other crossing points on the A628 and A57 in particular can already be difficult to use due to existing levels of traffic. Users of these routes are also exposed to traffic noise, dust and vehicle fumes when using, or waiting to use these crossing points.

Both the A628(T) and A57 Snake Pass are predicted to see increased traffic flows as a result of the scheme compared with the 'Do Minimum Scenario'. For those crossing these roads, the increase in traffic flows will make these crossings even more difficult. Table 8.2 shows the predicted traffic flows at each of the crossing points described above both with and without the scheme.

The issue of severance will also be made more severe in the village of Tintwistle as a result of the scheme.

## Road safety

The schemes Transport Assessment acknowledges the current high accident rate on

the A57 Snake Pass. It goes on to state that the increase in traffic flows as a result of the scheme is likely to increase the number of accidents by: -

"more than 160 over the 60-year appraisal period, as a result of increased flows in the DS scenario."<sup>3</sup>

The Transport Assessment goes on to state that: -

"Small increases in accidents are also expected through Glossop and along the rural sections of the A628 east of Tintwistle."

## Climate

The Environmental Statement contains detailed consideration of the physical effects of climate change on the planned road structure that appear robust and thorough. However, consideration of the schemes contribution to climate change is not analysed with an equivalent rigour.

Officers believe that a more local assessment of impact should be undertaken to consider the emissions in relation to those who are likely to benefit from the scheme and the immediate area where its impact will be felt, would be more appropriate.

## Cumulative impacts

Officers are particularly concerned about the cumulative impacts of the scheme on the following: -

- a) Tintwistle increased traffic flows through the village are likely to worsen air quality and noise & vibration; increase severance and effect experience of the Conservation Area.
- b) Designated sites increased traffic flows are likely to increase nitrate deposition, noise disturbance, risk of wildfire and collisions with wildlife. It is of particular concern that the effects of the increase in traffic on the A628 have not been assessed in relation to these impacts.
- c) Quiet enjoyment increased traffic flow will affect both tranquillity and the quiet enjoyment of the landscape. It is also likely to negatively affect the use of important multi-user routes due to the increased difficulty of using crossing points.

# Proposals

Officers of the Authority have been engaged in discussions with Transport for the North, Highways England (National Highways) and the Department for Transport in regard to a holistic approach to improving east-west connectivity across the Southern Pennines including across the National Park. Over time these discussions included a proposal for a complete Trans-Pennine Tunnel; and then a part-Tunnel. At the current time, it is unclear how this holistic approach might be taken forward. It is therefore important that any assessment of the A57 Link Roads scheme is based wholly on its own merits as a scheme addressing localised issues for the Longdendale villages.

National Policy clearly sets great weight on the conservation and enhancement of the landscape and scenic beauty of National Parks; along with their cultural heritage and wildlife. The A57 Link Roads scheme is located wholly outside of the boundary of the

<sup>&</sup>lt;sup>3</sup> A57 Link Roads TR010034 7.4 Transport Assessment Report

Peak District National Park and so the development itself does not directly impact on the National Park.

The A57 Link Roads scheme is however predicted to significantly increase traffic flows within the National Park. This does go against the policy approach provided within our Core Strategy (Policy T1B) which seeks to deter cross-Park traffic. This policy approach is based on the anticipated harm of increased traffic flows on the special qualities of the National Park. The predicted increase in traffic flows along the A57 Snake Pass and the predicted transfer of traffic from the M62 to the A628(T) are particularly at odds with this approach.

The increased traffic flows across the National Park that are predicted as a result of the scheme do clearly incur indirect impacts on the National Park. In all cases, where they have been assessed, they are judged by National Highways to be, at worst, slight adverse (except in the case of road safety). However, it is the opinion of officers, that the even slight adverse impacts should be given due weight within the National Park. This is because of the additional impact this represents from existing levels and the national importance of the Park's special qualities; and the international importance of its ecological designated sites.

In particular, the cumulative impacts of the predicted increase in traffic flows across a range of special qualities is of particular concern. Given the range of predicted impacts, officers believe that the only appropriate response is to formerly object to the proposed scheme.

## Are there any corporate implications members should be concerned about?

## Financial:

#### 5. None

#### **Risk Management:**

6. Objecting to the A57 Link Roads scheme will be seen in a negative light by residents of Mottram and Woolley Bridge most affected by the scheme.

Support for the scheme or a withdrawal of our holding objection may be seen to be being accepting of harm to the special qualities of the National Park. Residents of Tintwistle may also believe that the Authority is not acting in their best interests.

#### Sustainability:

7. None

## Equality, Diversity and Inclusion:

8. None

## 9. Climate Change

The delivery of the scheme is likely to increase carbon emissions within the National Park in the medium term due to the predicted increase in traffic flows.

## 10. Background papers (not previously published)

None

# 11. Appendices

Appendix 1 - A57 Link Roads Scheme Peak District National Park Local Impact Report

Appendix 2 - PREDICTED CHANGES IN TRAFFIC FLOWS AS A RESULT OF THE A57 LINK ROADS SCHEME

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