

## Strategy and Policy

1. No proposals to improve public transport or provide cycle/walking routes were offered in the planning application. Much greater improvement would be achieved by using a sustainable package of measures - such as CPRE's Way to Go - which would reduce traffic and remove the lorries onto the motorway network by placing a weight restriction on the Woodhead and other neighbouring east-west routes, forcing lorries onto the motorway network around the Park the M1, M62, and M60.
2. The proposals are inconsistent with regional level policies on agricultural protection, protection of valued countryside and development in flood risk areas.
3. The High Peak Local Plan considered in the EIA submitted with this planning application is April 1998. The latest version of this plan, published in March 2005, has not been considered. The forecast increases in traffic through Glossop and Dinting will make it difficult to implement many of the intended public transport improvements, and will make walking and cycling less attractive to local residents.
4. The forecasts for the Glossop Spur/Mottram-Tintwistle schemes do not take into account new transport initiatives, such as the environmental levy and road-user charging, the Park and Ride facility at Dinting, and the planned new railway station at Gamesley. Given that these initiatives may resolve many of the transport problems without bringing about the wholesale destruction of the Longdendale Valley and protected Green Belt, endorsing this planning application until the effects of these other measure are known would be wholly premature and irresponsible.
5. The High Peak Local Plan states that, "the Council will promote greater use of rail freight". Supporting commercial schemes that would see Woodhead Tunnel reopened for rail-freight services, combined with HGV weight restrictions on the A628, would eliminate the need for the Glossop Spur.
6. The proposals contradict UDP Policy 1.2 - "Maintaining an Integrated Transportation Strategy". In the +12 years that this scheme has been on the table, residents of Longdendale have seen nothing other than deterioration in public transport and no positive steps towards developing or promoting integrated transport alternatives and modal shift.
7. The proposals contradict UDP Policy 1.6 - "Securing Urban Regeneration" as any positive impacts within Longdendale will be offset by negative impacts in the surrounding areas of Denton, Audenshaw, Stalybridge, Dinting, and Glossop. Drawing traffic away from Mottram and Hollingworth centres is unlikely to aid regeneration. Local residents using these areas as through-routes to Hadfield, Padfield, and Glossop stop at local shops, cafes, and post offices on their way too/from work/school. If these routes are altered, many businesses are likely to lose trade and further degradation of the local economy is likely.
8. The plans submitted as this planning application<sup>1</sup> differ from those on which the public were consulted. On this basis, public support for this scheme has not been obtained.

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<sup>1</sup> Refer to Vol.1 , page 13 for a description of the scheme on which the public were consulted in 2003.

## Traffic Impacts

9. Within the UDP for Mottram and Hollingworth (T3(1) regarding the Spur). The UDP states that, "The scheme (Glossop Spur) is not intended to increase capacity". Whilst it may not be intended to increase capacity, the Traffic Assessment clearly shows that it does generate an overall increase in both the capacity of the road system and the volume of traffic carried through the valley.

The UDP also states, "The Highways Agency will assess the transport impact (of the Spur) on the trunk roads". However, no figures are presented for the impact on the surrounding trunk road network.

10. The proposals contradict UDP Policy 1.3 – "Creating a Cleaner and Greener Environment" as they encourages traffic influx, thereby increasing the impacts of noise and pollution and destroys a valuable local amenity site.

11. Traffic volumes in the Do Something scenario (Table 6.3.4.3, Vol. 2 – Part 8, page 42) are predicted to decrease traffic at link sites A560 Stockport Road, B6174 Ashworth Lane (E), Broadbottom Road, A57 Mottram Moor, A628 Market Street, and A57 Woolley Lane are offset by increases at the following sites:

Bypass Western Section (+14%)

Bypass Eastern Section (+2%)

Mottram Link (+17%)

A6018 Stalybridge Road (+2%)

A6018 Back Moor (+6%)

B6174 Stalybridge Road (+9%)

B6174 Ashworth Lane (W) (+1%)

A57 Mottram Moor (link bet. A6018 and Mottram Link)

Woolley Bridge Road (+ 32%)

A57 Brookfield (+31%)

A57 Dinting Vale (+24%)

12. If the Spur, Mottram Link and Mottram-Tintwistle bypass are built, the percentage of HGVs in the area are forecast to increase on at least 50% of all routes during AM and PM peak times by 2023.

13. Traffic figures must be revised taking into account a 2010 (or later) opening date and a wider study area considered (as per WebTAG) to ensure that accurate and complete modelling data is used<sup>2</sup>.

14. The bypass and Spur would double traffic in the area generally by 2022. These increases will worsen congestion, noise, air pollution, accidents, and lead to further degradation of the environment.

15. Climate change is the biggest threat to sustainable development. Motorised travel produces 25% of UK CO<sub>2</sub> emissions, of which 80% is from road transport. All councils must contribute to reductions of 20% CO<sub>2</sub> emissions by 2010 and 60% by 2050. At present the UK is not on track to reach the 2010 target. Tameside's record on CO<sub>2</sub> emissions is already one of the worst in the country, having increased emissions levels by 36.6% since Labour came to power in 1997<sup>3</sup>.

<sup>2</sup> See Vol.2 – Part 1: Air Quality, Section 6.7: "Considerations and Recommendations".

<sup>3</sup> See [http://www.dft.gov.uk/stellent/groups/dft\\_transstats/documents/page/dft\\_transstats\\_027414.hcsp](http://www.dft.gov.uk/stellent/groups/dft_transstats/documents/page/dft_transstats_027414.hcsp).

16. Contrary to the claim that the Spur will bring relief to Glossop traffic, the Spur road would increase traffic on the A57 through Glossop<sup>4</sup>. 6,000 more vehicles are predicted on Dinting Vale road an increase of 25%. 2,400 more vehicles per day are predicted on the A57, through the Peak Park - an increase of 50%.
17. Increases in traffic would undermine integration of sustainable transport networks by making car use more attractive. No explanation is given as to how bus services would actually be improved with all these cars on all the roads.
18. Traffic flows on the A6018 Stalybridge road at Back Moor would continue to carry high flows and would increase by 15% to 20,996<sup>5</sup>.
19. The traffic forecast is incomplete as only Do Minimum (Bypass-only) and Do Something (Bypass + Spur) forecasts are provided. In order for the scheme's impacts to be properly assessed, a forecast for Do Nothing should also be provided.

### **Air Quality, Noise, and Health Impacts**

20. Air pollution forecasts do not go beyond 2008, yet the scheme is not forecast to start until then so these figures are meaningless. Forecasts should be shown up to 2023 (in line with the traffic forecasts) and should be comparable to a Do Nothing scenario for 2023.
21. Negative impacts on air quality caused by increases in traffic volumes go against RPG 13 - Regional Planning Guidance for the North West (2003)/ RSS 13 Regional Spatial Strategy for the North West (2004) aims to improve air and water quality, manage the fabric of sensitive rural landscapes, and to protect wildlife.
22. The overall increase in traffic volumes caused by the Bypass and Spur would cause air pollutants and CO<sub>2</sub> levels to increase with an additional 1,396 tonnes of CO<sub>2</sub> predicted every year. Deterioration in air quality is anticipated adjacent to new road routes and new junctions. Specific areas identified in the EIA are:
  - Adjacent to the Mottram Link Road (which joins the Spur and the bypass together)
  - The Mottram Link Road/A57 junction on Mottram Moor adjacent to the Glossop Spur
  - The Glossop Spur/A57 (Brookfield) junction
23. Although residents on Woolley Bridge would benefit from improved air quality, properties adjacent to the scheme would suffer from deterioration in air quality. Residents in Dinting, Glossop, Denton, Audenshaw, and the fragile landscapes bordering the A57 and A628 across the Peak Park - though not sampled in the EA - would see deterioration in air quality, as a result of the traffic increases.
24. 1470 properties will see no change/improvement in NO<sub>2</sub> levels. 496 will see a reduction in air quality. 1646 will see no change or improvement in PM<sub>10</sub>. The reduction in air quality will be felt at the A6018/Mottram Moor junction, at Brookfield, and Dinting Vale, close to a popular local primary school. NO<sub>2</sub> is a respiratory irritant, which may exacerbate asthma and possibly increase susceptibility to infections. Particulate matter (PM<sub>10</sub>) is associated with health effects including increased risk of heart and lung disease. In addition, they may carry surface-absorbed carcinogenic compounds into the lungs.
25. Table 6.2.3.2 forecast that by 2023, the Glossop Spur (Do Something) will cause 154 properties to experience a 3 dB to 15 dB increase in noise versus only 30 properties suffering a similar increase if the Spur is not built (Do Minimum). It is not possible to evaluate the impact of either scenario versus a Do Nothing scenario for 2023 as no figure were presented.

<sup>4</sup> As no "Do Minimum" figures were provided with the Traffic Assessment, percentage increases are based on flows recorded in 1994, provided as part of the Greater Manchester Local Transport Plan (2000).

<sup>5</sup> Ibid.

## Landscape, Wildlife, and Heritage Impacts

26. The proposals runs contrary to the UDP Policy 1.10 – “Protecting and Enhancing the Natural Environment”. Destroying bat, otter, and badger habitats, dissecting protected green belt, putting one long-standing farm community out of business and severely debilitating two other working farms is not compensated by a few extra trees and fencing.
27. Wildlife habitats for badgers and other animals would be destroyed. Bats and otters are classified as European protected species under the Conservation Regulations 1994. Proposed mitigation, including fences, underpassing, and translocation for badgers are known to be ineffective.
28. The proposed road will fragment the habitat of three RSPB Red list species, six Amber list species, and one local BAP species.
29. Although no direct evidence of bats roosting in trees was found, of the 26 trees surveyed 12 were considered to have medium roosting potential and 4 high roosting potential. Changes in land use will reduce areas of insect-rich habitat and the connective flyways, which act as feeding and commuting routes between these habitats. As the report itself suggest, further survey work must be carried out to determine more accurately levels of bat activity and roosting behaviour.
30. The potential of the River Etherow to flood would substantially increase (more hard surfaces = increased run-off + greater load on river). This is considered a high risk by the developers.
31. Construction would cause severe disruption to have severely negative impacts on the A57, on Mottram Moor, and on noise and air quality. 165,287m<sup>3</sup> of suitable fill material will create an additional 16,529 HGV movements.
32. Pedestrian access would be limited: there would be no footways alongside the Spur, a bridge over the Spur to the north of Mottram Moor by footbridge and a pedestrian controlled crossing near the Brookfield roundabout approximately 200m west of the River Etherow.
33. Footpath surveys were carried out on Friday 3<sup>rd</sup> and Saturday 4<sup>th</sup> December 2004. The mean temperature for December 2004 in the North West was 5.3 C<sup>6</sup> and limited daylight hours would have impacted on the recreational use of these rights of way (as is noted in Vol. 2 – Part 8, Section 4.7.4<sup>7</sup>), hence the results of surveys used as the basis for determining the impact of the Glossop Spur proposal on loss of amenity can be seen to be flawed, and the resulting conclusions unrepresentative.
34. The amenity value of routes such as A57(T) Mottram Moor and A57 Woolley Lane were evaluated as low owing to current traffic volumes (see Table 6.3.31, Vol. 2 – Part 8, page 38). The report assumes that the link would improve the amenity value, but provides no forecasts to support this. Traffic figures for Do Nothing (LTP-only improvements), Do Minimum, and Do Something would have to be provided for future years (2025) – along with survey’s carried out at more appropriate times of year – in order for this change of amenity to be properly assessed.
35. LON/90, LON/91, LON/92 and LON/93 will suffer visual and landscape intrusion from the road. The road proposal will alter the character and enjoyment of local people using these routes, which are currently away from traffic and an essential area of tranquillity and natural heritage that will be destroyed if the Glossop Spur is built.

<sup>6</sup> See <http://www.met-office.gov.uk/climate/uk/2004/december/averages1.html>

<sup>7</sup> Vol. 2 – Part 8, Section 4.7.4 states, “Higher levels of amenity would be likely during summer months when visual determinants such as vegetation cover become an important factor in user route selection and frequency of use (e.g. by equestrians).”

36. Of the 24 link routes examined in Table 5.9.6.5 (Vol. 1, page 200) analysis determines that building the Glossop Spur will bring only Moderate or Slight to relief to 7 routes, and is determined to bring No Relief to the remaining 17 routes. Beneficial impacts on Mottram Moor and Woolley Bridge will be offset by negative impacts on the A57 Brookfield, Woolley Bridge Road, and A57 Dinting Vale.
37. Absence of dedicated cycle lanes and lack of pedestrian controlled crossings is not reason enough to build a road. Tameside Council have invested all energies in waiting for the Glossop Spur to be built, and much more could have been done in the interim to improve and promote facilities for walkers and cyclists and to encourage modal shift. As no attempts at improvement have been made, it is unreasonable to conclude that the only way such facilities could be improved would be if the road were built.
38. Table 6.3.4.2 (Vol. 2 - Part 8, page 41) concludes that physical severance to all routes will have a negative impact on all rights of way and footways. Community severance created by the Mottram Link will be severe and provision of a raised crossing, connecting cyclists and pedestrians to Mottram and Hollingworth will are not suitable for elderly or disabled users, or pedestrians with buggies/small children.
39. Locally designated green belt land is located within a large proportion of the study area, extending north beyond A57(T) Mottram Moor, bounded by the towns of Mottram-in-Longdendale in the west and Hollingworth/Woolley Bridge in the east and Gamesley in the south. Currently Mottram and Hollingworth back onto open farmland and moor. If the Spur and Bypass are built the villages will be surrounded on all sides by roads and will no longer enjoy a direct relationship with the countryside. The rural character of the village will be lost.
40. The road and related attempts to mitigate against "visual intrusion" and noise pollution through the building of "environmental mounds" will cause an irreparable damage to local views across the valley from the Melandra, Mottram Church, and Mottram Show Ground, and Hobson Moor Road. These views, and the movement of traffic up the side of the valley, will ruin the character of the countryside. Established hedgerows and trees will be lost. This degradation by a road conflicts with Government guidance on the countryside and with policies in all the statutory documents.
41. The scheme would be visible from Mottram Conservation Area, the boundary of which is only ~150m away from the Spur road. Tameside's policies (C2 and C4) require the Council to protect and enhance the Area and ensure that development adjacent to it "*makes a positive contribution to the context in which it is set*". The road would spoil the rural backdrop of the Conservation Area.
42. The Green Belt would be cut in half and fragmented, increasing the potential for infill development and development alongside the Spur, and thereby destroying the uniqueness of each village. The likelihood of this is high: one of the landowners affected by the scheme is a property development company, as is the new owner of Hollingworth Hall Farm; other landowners in the area are already being approached by potential developers interested in acquiring land adjacent to the Spur and Bypass.
43. There would be an increase in light pollution with lighting at both roundabouts and on the Mottram Link road to the bypass. Light pollution is now a statutory nuisance. The impact would be particularly severe from the stunning grounds of Mottram church.
44. The setting of Melandra Castle, a Scheduled Ancient Monument would be irreversibly damaged. This would be indirect damage but still very important. There are also numerous archaeological finds of lesser importance many of which would be damaged and/or lost forever. The heritage of the villages would be impoverished.

45. As Section 4.2.1, the cultural heritage of the landscape that will be destroyed by the Glossop Spur road is rich, varied, and extensive. Few people are aware of this rich history and if encouraged to take an interest it would strengthen people's sense of community and attachment to area. This would be of greater benefit to Mottram and Hollingworth than the severance the road will cause.
46. Remains of the prehistoric and Roman periods are rare within the region. The Melandra Fort is a Scheduled Ancient Monument and test pits in the valley floor where the proposed road will go is a likely site of valuable Roman finds of regional importance, and may include a Roman road system.
47. The scheme is determined to have both direct and indirect negative impacts on many significant cultural heritages of sites of both local and regional importance (see Vol.2 – Part 2, Sections 6.3.1 and 6.3.2 for full listings). The overall assessment of Moderate Adverse impact on Cultural Heritage conclude that:
  - The road proposals would have a direct effect on regionally important sites, resulting in the loss of 5-49% of features. The proposals would result in major visual intrusion into the immediate setting of regionally important sites, to the extent that their context is seriously compromised and can no longer be appreciated or understood.
  - The road proposals would result in visual intrusion into the wider setting of nationally important sites, to the extent that their context is compromised and appreciation and understanding is diminished.
  - The road proposals would have a direct physical impact on or compromise the wider setting of multiple sizes of regional importance, to the extent that the cumulative impact would seriously compromise the integrity of a related group of sites or historic landscape.
48. The possible iron-working site (site 28), if confirmed as such, might also be of regional significance, based mainly on the criterion of rarity. This should be further investigated before any decision is taken regarding the road proposal.