Written Submission To The Inspectorate Regarding Application by Highways England (now National Highways) for an Order Granting Development Consent for the A57 Link Roads



In my initial Register of Interest to the Public Enquiry 2021, I raised 14 points of concern about the A57 Links Roads proposal.

Of those points I wish to flag up further and in particular, point 5 'viable and realistic alternatives such as a Gyratory Flow system around Mottram, lorry bans etc too easily dismissed by a road-centric organisation'.

In doing so, I directly or indirectly make reference to points 3, 7 and 14 in my Register of Interest since they are inter-related topics, which are respectively:

Threat to PDNP. A Trojan Horse for a Motorway by stealth.

Threatens to increase traffic not lessen it by making it a more attractive route, storing up further problems for the future.

Scheme is short sighted, lacking in imagination and offers little or no benefit to the area. A jobs-for-the-boys creation scheme from a non-neutral organisation.

Also, with reference to sections 2a and 2b of the Planning Inspectorate document dated 6.10.21 (Planning Act 2008 – Section 88 Initial Assessment of Principal Issues) I take issue with National Highways on both these points, namely:

- a) The need for the Proposed Development... and
- b) Whether there has been a meaningful consideration of alternatives including, but not restricted to, a long bypass of Mottram in Longdendale, Hollingworth and Tintwistle and restrictions on heavy commercial vehicles using the A57 and A628.

If memory serves me correctly, it was at a High Peak Borough Council (HPBC) planning meeting in Chinley, December 2005, when councillors patted themselves on the back for giving themselves planning permission to build the Glossop Spur, as it was called back then.

There were only 7 letters of support for the road. Councillors, disappointed at such lack of enthusiasm, stated at the time that as a standalone scheme it would be unsupportable. However, they assured residents it was essential to connect Glossop and its traffic with the proposed Mottram 'bypass', which they assumed was imminent.

All these years later and the A57 Link Roads appear to all intents and purpose to be the Glossop Spur in a new guise except that it doesn't actually 'link' to anything at all! Yet!!! At least though, HPBC are being consistent in their position through putting in a 'holding' objection to the scheme.

For their part, National Highways (NH) by their own admission, through their statistics, are signalling that the roads will act as a magnet for additional traffic to the area. Doubtless to say, in no time at all, this will lead to demands for even more road building. Indeed, this may be the whole point of the scheme!!! It certainly gets to the nub of the issue.

Whilst local people seek only a local solution to a local problem, the NH have far more wider reaching plans for east-west connectivity. The two competing demands are incompatible with each other.

This scheme will actually exacerbate conditions locally, drawing in more traffic and spilling more of it onto the A628 and the A57. Equally importantly, most of the smaller, local roads, will suffer even greater volumes of traffic which is unsustainable, especially in view of the deluge of planned development that is set to explode in Glossopdale.

Those councillors back in 2005 who brazenly admitted that the Glossop Spur had little value as a standalone project were at least being honest and upfront.

I contest the proposal that the area needs more roads and more traffic and I further contest the need for these 'link' roads at all. Instead, I would assert that all that the area really needs is a local solution to the blockages at the Gun Inn and Mottram lights in order to circulate traffic, allowing it to flow freely and unimpeded.

My proposal for doing so is the Mottram Gyratory Flow that was presented as Alternative 1 at the derailed Mottram Bypass Public Inquiry of 2007-8 and which I attach as an alternative to this scheme.

I also contest the idea that all realistic and viable alternative proposals have been assessed and/or given equal weight and treatment in any such assessment by NH.

As the author of the Mottram Gyratory Flow, which is a standalone solution with three Options (see attachment) neither National Highways nor their predecessors, Highways England or

Highways Authority have ever contacted me to say that they have assessed it in that capacity, or indeed at all.

As such, unless and until they can provide some evidence to the contrary, I must assume that no such assessment has ever taken place.

The only reference I can find in the plethora of material that has been produced over the years is the attached extract from pages 11 - 14 of a Department for Transport report from March 2015 entitled: **TRANS-PENNINE ROUTES Feasibility Study Summary.** It's description at 5.7 is somewhat misleading and my attached map of the gyratory flow is the accurate one.

In its Stage 2 Report – Annexes, Annex 1, dated February 2015, at the 4th line in the table, (I can forward the document on request but it should be available from NH) the Mottram one-way option scored highly across all criteria as a standalone option, evidence that all the additions which HE added as described in 5.9. were unnecessary.

Consequently, I don't feel that it was assessed correctly. As such, the Mottram Gyratory Flow ought to be rigorously assessed, as an alternative, either as part of the Enquiry or as a prelude to its advancement. Instead of all the stuff they added (which misses the point of what I am trying to achieve) it should have been tested, if, with anything at all, then, with sustainable travel measures.

NH should therefore be required to mock up, traffic model and transparently compare and contrast alternative solutions against their own scheme. Any robust alternatives presented, that have clearly not been assessed, ought to be given such opportunity.

How else are we to be satisfied that the NH scheme is both the best and the only solution? Again here, we revisit the question as to whether the scheme is ultimately aiming at an east-west motorway or merely attempting to solve a local problem.

At the 2007-8 Public Inquiry fiasco, the sole reason given by the Highways Agency (as it was at the time) for not supporting the Mottram Gyratory Flow was that it didn't do anything to remove traffic, especially HGV's, from the villages of Hollingworth and Tintwistle, which their scheme then did.

The current scheme no longer does anything about that particular issue either, other than some token traffic calming measures. Therefore, that sole reason for not supporting the Mottram Gyratory Flow, as a solution in its own right, no longer exists. The two competing schemes can now be judged equally and can be compared one against the other, each resting on their own merits, as the standalone schemes which they are.

The Mottram Gyratory Flow and its advantages over that of the NH scheme are contained in the several attachments, which include a map of the proposal and how it would work.

If I were to summarise those advantages, in a single paragraph, it would be as follows:

The Gyratory Flow improves east-west connectivity by creating free-flowing traffic thus eliminating bottle-necks and decreasing journey times. As a consequence of this, air quality improves through the absence of standing traffic, circulating it instead. At the same time, it uses the most minimal amount of construction (a single strip of road from the M67 roundabout to Back Moor, using a very small portion. of greenbelt). Consequently, it would barely expand road capacity and not act as a magnet for traffic as the NH scheme does. It could also be built very quickly, without a tunnel and at a fraction of the cost of the current proposal from NH.

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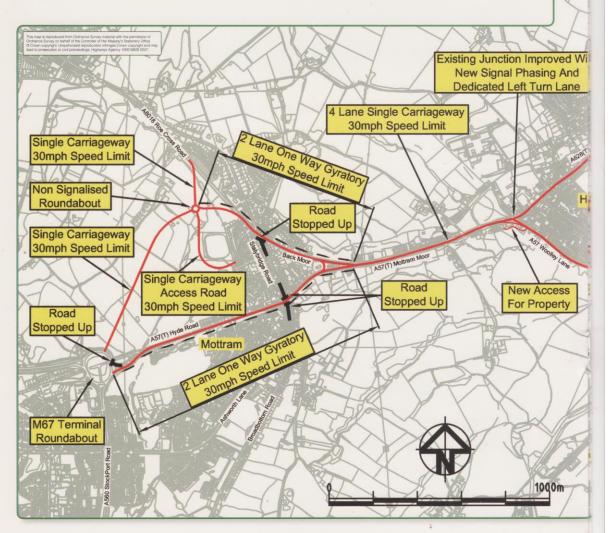
Steve Bagshaw

Alternative 1

This alternative would utilise the existing road network around Mottram and Hollingworth and proposes a new 2-way link between the M67 Terminal Roundabout and a new roundabout with the existing A6018 Roe Cross Road.

The A6018 Roe Cross Road, Back Moor and the A57(T) Hyde Road would become a one-way 2-lane gyratory.

The existing A628(T)/A57(T)/A57 junction at the Gun Inn would be modified to provide a dedicated left turn lane from the A57 Woolley Lane to the A57(T) Mottram Moor westbound and would include revised signal phasing. The mini-roundabout south of Woolley Bridge would be replaced by a newly aligned T-junction, with the A57 being the primary route.



OUTLINE SUMMARY OF GYRATORY FLOW PROPOSAL FOR MOTTRAM by Steve Bagshaw

Outline Summary of the plan.

My contention is that the only thing that needs bypassing are the traffic lights on Mottram Moor. They restrict the free flow of traffic movement and are the main reason that traffic bottles up in the area. They are also the key reason as to why heavily laden lorries regularly break down on the Moor creating major problems when this happens. Simple observation shows that even when traffic coming off the Motorway is light, there is queuing traffic at Mottram lights and on the Moor itself purely because the lights are there.

My solution to the problem is simply to eliminate the lights altogether. I would do this by stopping up Market St between the lights and the junction with Ashworth Lane and by stopping up Stalybridge Road between the lights and the junction with Back Moor.

This would allow traffic to flow up the Moor to the existing Motorway junction without impediment. Traffic coming off the Motorway heading for Sheffield and Glossop would travel on a new strip of road from the existing Motorway junction where it would follow more or less the proposed route of the bypass but only as far as Back Moor, which it would join, creating a loop of free-flowing traffic around Mottram.

Traffic from Broadbottom to Stalybridge, which represents a minor flow (and vice versa) would be re-routed through the existing Motorway junction via Ashworth Lane and the strip of road that I propose be built (and vice versa).

What are the deficiencies in the scheme that National Highways are proposing?

- 1. It destroys greenbelt in Mottram and its environs.
- 2. Enormous cost for what it achieves. Currently well in excess of £350,000 per household relieved.
- 3. It expands road capacity and therefore will attract new traffic to the area.
- 4. Possible destruction of perfectly habitable residential properties in Mottram.
- 5. Presents a potential Motorway threat to the National Park.
- 6. Destroys farmland in Hollingworth and Woolley Bridge. This leads to a deterioration of what is still a semi-rural environment. The infill that comes in the wake of road building on this scale, causes even further deterioration of that environment. The small stretch of road I propose that NH should build is wetland and therefore unlikely to foster any infill or sprawl.
- 7. Much disruption to both road users and residents alike during the construction process.
- 8. Does nothing to deter car usage and does nothing to aid promotion or enhancement of public transport. This is very much a dated project that has its roots in the previous century and takes no account of changing attitudes to transport, road usage and environmental degradation.

What are the advantages of the Gyratory Flow system?

- 1. It largely protects the greenbelt in and around Mottram.
- 2. It saves amenities such as Mottram Showground, Swallows Wood and other local treasures from the threat of destruction either now and/or in the future
- 3. Will provide huge savings to the Treasury/NH/the taxpayer as a cheap but effective replacement to the current proposal.
- 4. Barely expands road capacity therefore unlikely to attract new traffic which the NH admit their scheme will do.
- 5. Doesn't require any homes to be demolished. Further savings plus no upset for those who would otherwise lose their homes.
- 6. Doesn't create any new bottlenecks.
- 7. Doesn't present a potential Motorway threat to the Peak Park. A glaring deficiency in the NH scheme.
- 8. By creating 24 hour a day flowing traffic up and down the Moor in and outbound traffic to/from Glossop will move much more freely, eliminating the need for the Link roads.
- 9. Reduction in traffic through Broadbottom as unblocking the Moor will eliminate much of the so called 'rat running' there.
- 10. No loss of farmland in Hollingworth or Woolley Bridge. This will help to retain the semi-rural aspect of the area and the distinctiveness of the communities whilst also alleviating traffic congestion. Infill development that normally follows large road building schemes will not be applicable under this proposal.
- 11. Can be implemented quickly and cheaply.
- 12. Minimal disruption to residents and road users whilst work in progress.
- 13. A traffic calmed environment for residents of Mottram living on Stalybridge Road and Market St, between the junctions where I propose the road be stopped up.
- 14. Creates many more winners than losers.
- 15. Potential to enhance traffic flow still further by an improved junction at Gun Inn and through further enhancements to the existing road infrastructure.

What are the deficiencies in the scheme that I am proposing?

No scheme will ever suit all parties but I believe this proposal would create a lot of winners and enable supporters on all sides to find some merit in what it achieves.

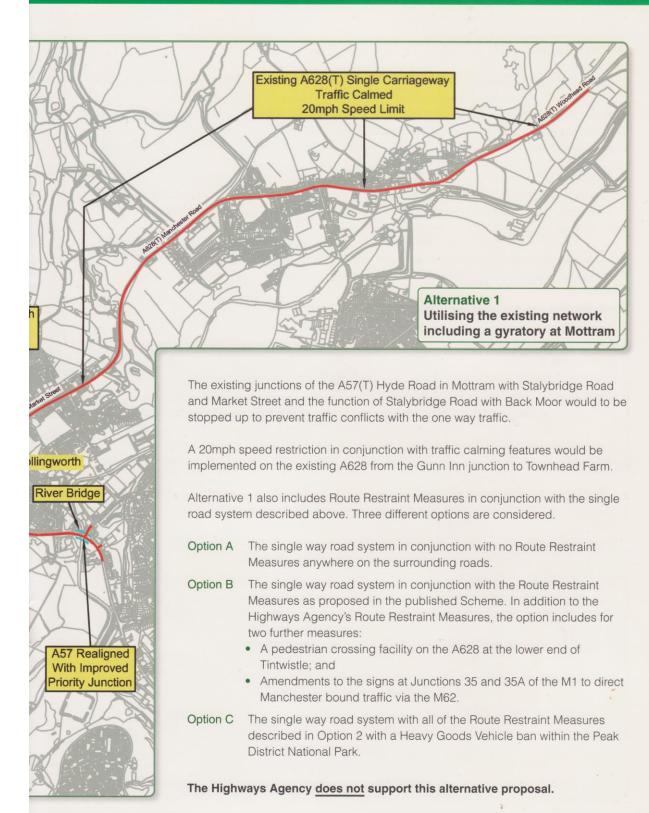
The main flaw in my proposal is that whilst it clearly demonstrates there is no requirement for the Link roads element, it does not take HGV's out of the villages of Hollingworth and Tintwistle. This was indeed the H.A.'s (as it was then) reason for dismissing my proposal at the 2007-8 Public Inquiry.

However, there may not be a panacea for this complex problem, be it a road proposal, two road proposals, a rail proposal or some form of weight limit or restriction.

I do think the Gyratory Flow outperforms the Link roads in a head-to-head standalone competition but perhaps the ultimate solution lies somewhere in between - that is to say the Gyratory Flow combined with a package of sustainable non-road travel measures, which might even include route restraint, with each having their part to play.

It is within this context that I wish to present my gyratory flow proposal. It clearly requires a small amount of road building, which would fall within the remit of National Highways to further assess, since it would be an addendum to an existing Motorway junction.

In conclusion therefore, I feel that either on its own or in conjunction with a package of other sustainable (non-road) measures (such as for instance, a weight restriction for HGV's, other route restraint measures and/or in the longer term a freight/rail proposal) this idea has much to offer in terms of easing traffic problems in the area, without creating new ones. I ask that it be considered and worked up into a serious alternative by NH as one such measure.



The following relevant extracts are taken from pages 11 – 14 of a Department for Transport report from March 2015 entitled: TRANS-PENNINE ROUTES Feasibility Study Summary

- 5.5 The option generation identified a long list of discrete highway and other transport interventions, together with packages of interventions. The next stage of work 'sifted out' any potential solutions that did not perform strongly against the specific intervention objectives, and/or failed to sufficiently alleviate the identified problems.
- 5.6 The initial sift also included considered the deliverability and technical feasibility of options and sought to identify any 'show stoppers' that were likely to prevent options being progressed.
- 5.7 Only those potential interventions that performed strongly against the sifting criteria were selected for further consideration. This made use of the Department for Transport's Early Assessment and Sifting Tool to provide a more granular assessment of the performance of potential options. Following this assessment of options it became clear that a small number of better performing options should be considered further. These options were: a bypass of Mottram, Hollingsworth and Tintwistle; the Mottram Moor Link Road; and
- an A57 Mottram one-way system a one way eastbound link from the M67 to the A6018; one way operation on the A6108 to the A57 and one way operation westbound on the A57 to the M67. (my emphasis)
- 5.8 Each option on its own had the potential to address the issue of congestion on the strategic route and was therefore expected to improve journey times and journey time reliability. They could also address some of the issues around safety and the standard of the road. Some of the investment proposals also had the potential to address the issues faced by communities in the Mottram, Hollingworth and Tintwistle area at the western end of the route.
- 5.9 Given the identification of three discrete investment options in the Mottram area, the study concluded that any overall potential investment package for the trans-Pennine routes should include a 'central package' of measures, that could, in combination with an investment option at Mottram, address some of the other priority issues identified in the study's work. This central package of measures is as follows: a link road between the A57(T) and the A57 in Glossop; safety measures across the route focussed on accident cluster sites and identified areas of concern; climbing lanes at locations on the A628 to negate the impact of slow moving vehicles across the rural sections of the route; a potential realignment of the A628 at Salters Brook; dualling the A61 between junction 36 of the M1 and the Westwood roundabout (at the junction with the A616); a technology

package across the A628 route and the wider area taking in the motorway network and local routes feeding into the strategic route; and • a maintenance strategy.

5.10 The assessment of the possible options focused on investment proposals that had the potential to be delivered in the short to medium term. However, the study recognised that some potential, more transformational investment options such as road tunnels, could provide a high performing road link. Such options would merit further consideration, particularly as they had the potential to deliver a step change in the future levels of connectivity between Sheffield and Manchester.

Package 3 (Central package and the A57 Mottram One-Way)

- The initial assessment of Package 3 suggested a high to very high value for money case and it would have impacts on connectivity between Manchester and Sheffield but only for trips via the A57, and does not provide significant additional capacity for these trips.
- The package brings journey time benefits for both local trips from in and around the Mottram/Tintwistle/Glossop area and for existing transPennine trips using the A628 or A57. However these are negligible in comparison to packages 1 and 2. It should also improve reliability for all users as it is effective in reducing delays on the A628 and A57.
- Some local trips will become longer as the result of the one-way system. The package does not remove traffic from urban areas, with the exception of the A57 to A57(T) 'Glossop Spur' link.
- The package is expected to bring slight adverse impacts to the landscape, noise, historic environment, biodiversity and the water environment.
- It was anticipated that delivery of all elements of the package could be completed by early 2022. END