
A57 Link Roads (previously known as Trans Pennine Upgrade Programme)
Planning Inspectorate Reference: **TR010034**

Peter Simon (A57L-001) - "Submission" to "Examination Deadline 4 - (including Response to Applicants Written Answer to my Deadline 2 Written Submission)

(Footnote *** contains an explanatory list of **acronyms** as employed in this submission)

1. Further comments on AQMA impact assessments

There is a policy burden on the Applicant for compliance in relevant AQMAs which neither an overall improvement in AQ across the scheme or mitigation will remove and is critical in the final decision making for the Scheme. The relevance of the AQMAs in Glossopdale is now an open question at this examination. The Applicant maintains that "screening out" removes the relevance of Glossopdale AQMAs for scheme assessment purposes. The Applicant also maintains in a response to my D2 WR that traffic diversion whether natural or enforced plays no part in their DM/DS "screening out". ***"The Scheme specific traffic model used in the air quality assessment did not include any assumptions around traffic routing to mitigate the potential for adverse effect on AQMAs in the local area"***. (Page 19 Comments on WR_D3_260122)

However the TAR document suggests otherwise- ***"Dinting Road - in conjunction with Shaw Lane, Dinting Road is an alternative route to the A57. It is important to capture possible alternative routes when assessing the impact of the Scheme on the A57"*** (Paragraph 2.2.5 000123 -7.4Transport Assessment Report) . This TAR statement acknowledges the importance of traffic diversion as regards impact assessment on the main road so further specific clarification from the Applicant is required. Particularly what "impacts" do they mean here and why they are not relevant to DS traffic increases that they have used to ascertain the screening threshold?

I have previously submitted that the anticipation of such diversion may be wholly unrealistic and so would suggest there is a compelling need for the A57 being remodelled with minimal diversion beyond current and DM levels to establish probable true "impacts". In the referenced response the Applicant seeks to dismiss ground level evidence supplied by myself and others that demonstrated there are impediments to further traffic filtering further through "North Glossopdale" (Footnote *): ***"The traffic modelling used to assess the Scheme has been calibrated and validated using observed traffic data to ensure that it reflects as accurately as possible the operation of the road network and accounts for existing capacity constraints on each link and at each junction."*** (Pages 18 and 19 Deadline 3 Submission - 9.38 Applicants comments on

Written Representations). However as the Inspectors will have seen for themselves on a site visit made at the turn of the year the constraints and impediments I described in detail are very real and certainly do exist. (Unaccompanied Site Inspection – 12 to 14 January 2022) They exist quite as much the data from the NH junction surveys which the Applicant feel gives them cause to disagree. So again there is an unresolved difference over the evidence for further capacity here.

In view of that uncertainty a precautionary principal on all health and safety grounds would require that the A57 should be re-modelled to openly consider the strong prospects of minimal diversion beyond the levels of today. Also as other parties (CPRE (ISH2 Item 6 “Climate Change” - **Footnote ******)) are doubting the year of baseline evidence supplied to the model and vital legal policy thresholds are in question, such an alternative model might become very necessary and significant indeed and so would be justified on that basis alone. I feel therefore it should be commissioned now for Examination purposes.

2. This submission considers and builds on a point of IP Mr Bagshaw at the recent ISH where he raised particular impacts threats to areas in North Glossopdale with high designations of protection. Mr Bagshaw highlighted that an enlargement of traffic flow filter expectation here does not properly reflect the limited junctions at the A57 thereby raising the reasonable prospect of rat run diversions through the Conservation areas of Padfield and Old Glossop that potentially link to the A57. Derbyshire CC the Highways Authority have in part specifically raised this very concern in their response to Inspector’s WQs regarding Padfield (Page 52, Q14.4 Deadline 2 Submission - Response to the Examining Authority’s First Written Questions (WQ1)). Strangely this was not dealt with despite their representatives attending the ISH2 (Item 3 Transport Networks - Mr Blissett) and this also remains “unresolved” at Examination. These are plausible threats to sensitive and protected assets where a significant DS traffic level rise would not be acceptable.
3. Mr Bagshaw and Mr Wimberley also raised a matter of “disenfranchisement” re the “Hadfield Alternative” concept at the ISH which merits elaboration. It was pointed out that certain documents known as “BBA” exist that inform the Scheme core documents, generally on a quite repeated “cut and paste” basis, but were available only at a late stage in the Examination in “secondary form” from an IP submission. (Page 115 CPRE Deadline 2 Submission - Cover Letter, Trans-Pennine Upgrade Stage 3 combined modelling and appraisal report, A57 Economic appraisal package, A57 Transport modelling package and A57 Transport forecasting Package reports).

The Applicant’s approach in withholding these documents therefore becomes an issue and one I understand several other IPs wish to have raised and scrutinised as well as myself. There is strong doubt that without their full earlier production of BBA documents core evidence like the TAR has been sufficiently explicable to allow independent non NH scrutiny as the DCO process might require. It comes across as being written in a sort of code where with the root documents withheld, the Applicant

alone can hold the key. The only existing NH peer review has very limited assurance having been only an internal one. (ISH2 Item 6 Climate Change, various NH representatives including Mr Catesmark and others)

4. A further issue of “disenfranchisement” needs to be highlighted here based on Mr Bagshaw’s observation about a traffic nuisance and safety threat to the Conservation areas. The Applicant somewhat controversially chose to hold the required Consultation during a critical pandemic starting in November 2020 and attempted to mitigate the obvious shortcomings through compensatory distribution of alert/response mailshots to most households within Glossopdale. Notably however they excluded - simply on the basis of cost - the Conservation areas of Padfield and Old Glossop. Noting the concern of IPs (statutory and non statutory) I feel this is an important new additional issue for the Examination to consider. As a resident of one of these areas I raised the matter with my local Ward Councillor (**Footnote ****) at the time who expressed equal concern and advised that when HPBC/DCC had made CG representations on this the Applicant was dismissive of the relevance of these Conservation areas as being outside the affected area. Meanwhile Mr Bagshaw has very plausibly offered evidence to suggest otherwise.
5. Further there is a major issue with regard to the Applicant’s approach to the element of the traffic filter through North Glossopdale, in that it generally lacks clarity. The Applicant has again taken inconsistent positions about this as I described in my first paragraph yet there is no doubt that the ES Traffic Data document identifies additional traffic somehow significantly filtering through the settlement. (6.5 Environmental Statement - Appendix 2.1 - Traffic Data). Also there are references to possible filter routes in the TAR, and lurking in the CPRE submission of “BBA” or “Routes to Market documents” there is something called the “Hadfield Alternative” including a illustrative map.(Page 115 CPRE Deadline 2 Submission - Cover Letter, Trans-Pennine Upgrade Stage 3 combined modelling and appraisal report, A57 Economic appraisal package, A57 Transport modelling package and A57 Transport forecasting Package reports) (Map on Page 117, Figure 2-6- ibid -)

There have been comments at the Examination (ISH2 Item 3 Transport Networks Mr Blissett) that there is no need on the Applicant’s part to model this “black hole” but the matter is otherwise, because as stated modelling already exists, it is just that it requires completion. It is reasonable in view of the fragment supplied to request the whole so as to be appropriately informed as to where the traffic is envisaged as being able to freely flow without serious detriment to the locality. At the moment this information is not properly forthcoming and is worrying thin. It is hardly good modelling practice to submit plans that suggest a route at one end only, because this leaves the area open to a random number of risks. One such is described below.

6. The Applicant has suggested there is a limited scope area for this Examination, and as above with the Consultation, so offering no recognition of the high level environmental sensitivity around beyond the immediate boundary of scheme. In part this limitation been recognised by the Inspectors when they undertook a site visit

unaccompanied in mid January to a Padfield Main Road layby which I suspect is that maintained by United Utilities. They have raised the matter of scheme visibility from this vantage point adjacent to the Conservation areas and the National Park. Were they to attend later this spring they would have found themselves within a major breeding ground for lapwing a “red listed species” in the UK. The UK government allocates significant budgets on national projects to try and protect the ever-shrinking breeding grounds of these diminishing “wetland waders” so it is not a minor concern. Whether or not this might or might not be a major biodiversity issue can only be established if the Applicant offers greater clarity over how the Scheme’s envisages in full that traffic is to filter through North Glossopdale. This model should be put in place.

7. Beyond this, yet another separate matter of disenfranchisement arises within the NH application process, which is an offer in principal and outline from NH, in answer to the joint HPBC/DCC LIR A57 Shaw Lane Junction 3 concerns, for undefined (infrastructure) works. (Page 14 - Deadline 3 Submission - 9.36 Comments on Local Impact Report submitted by Derbyshire County Council and High Peak Borough Council). The nature and extent of this offer is unclear, but it is reasonable to ask why such a proposal, if any way integral to the scheme, is not included in the case proposed in full so that it can be examined? This again seems questionable practice of consultative marginalisation of the interest of relevant citizens and parties.
8. Finally I would return to the matter of the nearby Godley Green Garden Village proposal. In my D2 Submission with reference to NPPF protection for Green Belt I raised that this NH Application coincides with the TMBC GGGV Application, so cumulatively amounting to the removal of circa 150 hectares of Green Belt. Also I noted that both Applications rely upon “*exceptional circumstances*” so effectively the Secretary of State may have to breach the GB statutory planning designation to approve either. “Exceptional” means “the rarest” of circumstances a condition which cannot be claimed for these closely neighbouring schemes, which form a significant parcel of contingent Green Belt within one Borough Planning Area. This question is yet to be addressed.

National Highways responded by addressing a different aspect of this question which was the consideration of traffic impacts that would be generated by the sizeable Godley Green application for over 2k dwellings. Firstly they wrote “*This site lies entirely outside the boundary of the Scheme, separated from it by existing urban development,*” which is a misrepresentation. (P22 - Deadline 3 Submission - 9.38 Applicants comments on Written Representations).

My D2 Submission shows clearly the Garden Village settlement proposal presents and relies upon direct access points about 2km away onto the A560 Stockport Road (aka Mottram Old Road) which is a primary route distinct from any urban area it might

pass through. The GMCA “Places for Everyone” draft TAR indicates clearly the intention for its traffic in significant numbers to link to the existing Junction 4 M67 Roundabout, the Western start point of the “Scheme”. It is important therefore to consider the capacity and design of the Scheme for accommodating such traffic which may be predicted to be mainly to the West, but realistically with the Scheme in place might go in either direction. NH do in fact acknowledge this elsewhere – *“if developments identified as being within the withdrawn GMSF are constructed and come into active use, it is expected that there will be an increase in the amount of traffic over and above the existing conditions.”* (Page 152 Deadline 1 Submission - 9.5 Comments on Relevant Representations). In view of this anticipated impact there is a requirement for NH to model such a traffic scenario to show how it will be safely accommodated particularly at the roundabout and with respect to the Scheme’s aims. NH also commented with reference to TMBC’s relevant representation;

“The now-abandoned Greater Manchester Spatial Framework (GMSF) proposed 2,790 homes in TMBC, this included the Godley Green development. TMBC has recently submitted a planning application for Godley Green independently of work on the new Greater Manchester Places for Everyone plan, but at the time of writing (December 2021) the application had yet to be validated. Once validated National Highways will consider whether the application should be included in the “core scenario” of the traffic model.” (Deadline 1 Submission - 9.5 Comments on Relevant Representations.)

It should be noted that recently the Authority indeed validated their own Application. I therefore request to know the NH fully updated and reasoned position on this important modelling question?

(Footnote *) For the purposes of this submission “North Glossopdale” consists of; Glossop north of the A57, Tintwistle, Hadfield (all in High Peak) and also has regard to the Hollingworth border in Tameside.

(Footnote **) I will seek to declare my email exchange of the time with my Ward Councillor for Deadline 5, subject obviously to his consent.

(Footnote *)** List of acronyms

DCC = Derbyshire County Council

D1 = Deadline 1 etc

DS, DM = Do Something, Do Minimum

GB = Green Belt

GGGV = Godley Green Garden Village

GMCA = Greater Manchester Combined Authority

HPBC = High Peak Borough Council

IP = Interested Party

ISH = Issue Specific Hearing

NH = National Highways

TAR = Transport Assessment Report

TMBC = Tameside Metropolitan Borough Council.

WQ = Written Question

WR = Written Representation

(Footnote **)** This submission refers to events in Issue Specific Hearings by topic/item in the absence of a true transcript record.