

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

Peter Simon (A57L-001)

Comments on submissions for Deadlines 5 and 6

1. General Comments

Several parties have now identified multiple major problems with the Scheme as well as practical impediments whilst the benefits remain largely poorly defined. Most of the impediments - for example land slip and flooding - the Applicant continues to sidestep or seek to defer to a post DCO "Detailed Design Stage". This rather than accepting that Examination begins to show there are obviously better more realistic solutions available here to the Government to relieve congestion on the national road network. Moreover the Applicant continues to maintain the dubious return of their scheme at the expense of a gratuitous erosion of irreplaceable environmental assets, both within and just outside the Peak National Park.

The Scheme appears incompatible with National Planning Policy Framework and various other approved methods of impact appraisal and even when viewed under the Applicant's clearly favoured and insisted metrics such as the NNNPS of 2014 and the DMRB strong doubts remain over necessary compliance. In all cases much rests on the safety of the Applicant's traffic model which continues notably to lack independent peer review with only internal scrutiny/validation. (P17Deadline 6 Submission – 9.60 Applicant's response to Second Written Questions 3.1)

2.

The A57 and North Glossopdale - incomplete traffic modelling for filtering traffic

As regards the security of the traffic model, my particular concern has been the Applicant's self acknowledged and somewhat brazen reliance on a "rat run" filter through residential and semi-rural North Glossopdale. I have already identified a major lack of clarity around these intentions and now as a result of the "black hole" in the modelling, serious inconsistencies are starting to emerge.

For example the Applicant claimed at D5; *"The Hadfield Alternative, is not an alternative scheme. It is an existing alternative route, or rat-run, via Dinting Road and Shaw Lane in Glossopdale that traffic currently uses to avoid traffic congestion and delay on the A57 through Glossop"* (TR010034-001102-TR010034_9.54.26Applicants Comments on Deadline 4 submissions)

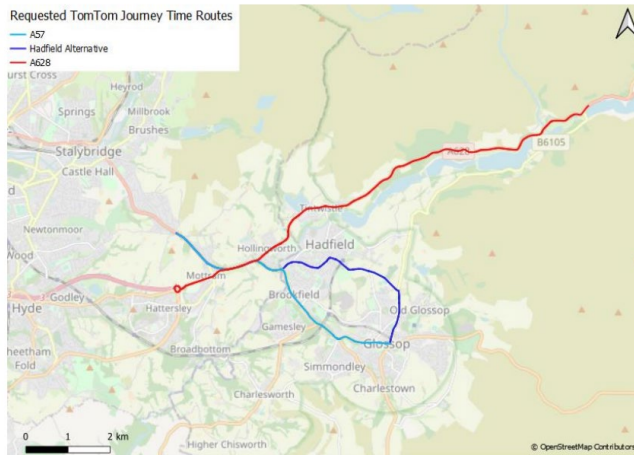
However the Figure 5.5 on P333 of the CPRE submission of collected "BBA Documents" shows quite otherwise and that in fact the Hadfield Alternative is a link

between Brookfield and the B6105 Woodhead Road of which full interim route detail is yet to be disclosed.

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P06
Information Risk Level - Low

DRIVING OUTCOMES

Figure 5-5 - TomTom Journey Time Routes



(Page 503) 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).

(See also Footnote *)

The specifics remain to be shown by the Applicant but this does reveal a lack of command of their own evidence and their modelling to be insufficient and confused. Such discrepancies obviously have further bearing when considering the matter of the Glossopdale AQMA compliance where doubts have been raised regarding the viability of diversions. The Applicant in answer to the WQ2 7.4 asserts they have modelled the “Worst Case Scenario” (WCS) but then I think tacitly acknowledge that they have not! Obviously the true WCS is the one yet to be modelled; – “if traffic was somehow prevented or discouraged from using Dinting Road and Shaw Lane then additional traffic modelling would need to be undertaken to understand the likely traffic redistribution effects across the road network, which would not necessarily mean that traffic flows on any alternative route, such as the A57 through Glossop (including Glossop AQMA) would increase. This is because there are likely to be wider, knock-on traffic redistribution effects”. (Page 61 “Deadline 6 Submission -9.60 Applicant’s response to Second Written Questions” 7.4)

Obviously any “wider knock on traffic redistribution effects” that the Applicant envisages as possible in this WCS are themselves again an unknown that would need to be carefully evaluated for new adverse impacts resultant on inappropriate through traffic. Were the Scheme to be “operational” these would have clear potential to threaten community existence in an ongoing way on a possibly non-compliant basis. Also, as I described at D4, unacceptable infringements on designated Conservation areas within in the adopted HPBC Local Plan become a

serious consideration. I would suggest some of these potential impacts are likely to be beyond the scope of possible “mitigation”.

To summarise the Applicant should be able to satisfy the EA that diverting traffic could pass freely and safely through residential areas without severance issues and inflicting harm, a matter in serious doubt as HPBC have now noted; *“More detailed analysis is required of the impacts of the increase in traffic using Shaw Lane and Dinting Road. The screening out of the consideration of the AQMA at Dinting is predicated on alternative routes across Glossop being readily utilised by vehicles. Our LIR questioned the suitability of the Shaw Lane and Dinting Road diversion “given this route has a higher number of roadside residential receptors” (paragraph 8.46). Even if feasible, such a diversion is likely to lead to negative impacts which have not been properly considered or mitigated. “(P44 HPBC Deadline 6 Submission – Response to the Examining Authority’s Second Written Questions (WQ2) 3.10).*

Of course as HPBC also point out, in the WCS scenario the issue of traffic not diverting away from the Dinting AQMA remains a serious impediment to the scheme, with unacceptable exceedances in AQ then a serious possibility to be considered.

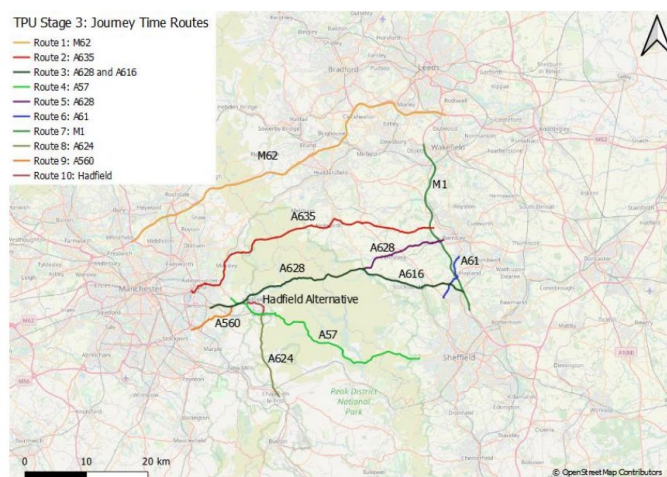
In my view the Modelling as discussed that might clarify this situation should already have been placed before the Examination which is now at quite a late stage and there is a danger of the clock being run down to avoid scrutiny. However time does remain before the scheduled Examination close in the middle of May, so hopefully were such evidence to be commissioned it could still be duly prepared in time for full written or further oral examination.

Footnote *

HE551473-BBA-GEN-A57_AL_SCHEME-AS-TR-000002
P05
Information Risk Level -



Figure 2-6 - Journey Time Validation Routes - PCF Stage 3



(Page 117) 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)