

Deadline 8 Written Submission To The Examining Authority (ExA) Regarding Application by Highways England (now National Highways) for an Order Granting Development Consent for the A57 Link Roads

From:

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Submission under the following headings

- 1. Introduction – Greater Manchester Travel Strategy**
- 2. A57 Link Road Proposals – lack of commitment to sustainable travel**
- 3. Integration with the GMTS.**
- 4. Golden Opportunity versus Missed Opportunity**
- 5. National Highways responses to a Mottram Gyrotory Flow Solution**
- 6. Consideration of a MGF within the Trans-Pennine Feasibility Study**

1. Introduction - Greater Manchester Travel Strategy

I would like to open this submission by making reference to the Agenda of Issue Specific Hearing 3 (ISH3) held on 5/4/22. On page 4 of the Agenda the ExA note that *‘both locally and nationally there is an aspiration to change travel habits in favour of more sustainable travel and policy reflects this. The Greater Manchester Travel Strategy (GMTS) sets out an aim for 50% of all journeys in Greater Manchester to be made by walking, cycling and public transport by 2040. Likewise, the Government’s Transport Decarbonization Plan (GTDP) seeks to deliver carbon reductions in transport’.*

Indeed, one only has to scan the document (Our Five-Year Transport Delivery Plan 2021-26 part of the GMTS - published January 2021) to see that certain key words, such as, inclusive, integrated, sustainable and Interchange crop up with regularity. To quote some examples from it, on page 4 *‘the development of new Interchanges’*, page 5, *‘an integrated and reliable public transport system for Greater Manchester... An integrated easy-to-use system with seamless connection’...‘the aim is to provide an integrated approach to transport and land use planning’.*

Page 9, paragraph 21 sums it all up succinctly; *'a strong commitment to provide a transport system which supports sustainable economic growth and tackles congestion, improves the quality of life for all by being integrated, affordable and reliable, protects our environment and improves air quality'*.

The GMTS target is for zero net growth in traffic between 2017-40 and to be a carbon neutral city by 2038 which *'involves significantly reducing motor vehicle traffic, incentivizing sustainable travel and reducing incentives to travel by car'*.

To give some local context to this, on page 284 of the document it refers to the recently opened Ashton Interchange which *'provides an easier way of switching between different transport modes and creates a more pleasant travel experience'*. A further Interchange is planned for Stalybridge in the near future.

2. A57 Link Roads Proposals – Lack of commitment to sustainable travel

Given this futuristic vision for travel, nationally and locally and with reference to question (I) *'whether the scheme supports the aims of GMTS 2040 and/or the GTDP'* - it has become quite evident that the A57 Link Roads project is the very antithesis of what the strategy envisions and hopes to achieve.

There is nothing sustainable, inclusive or integrated about it and no mention of any Interchange. On the contrary, it expands road capacity and encourages more vehicle traffic. National Highways (NH) own modelling verifies this and NH make no attempt to dispute the fact.

At the same time both of our local MP's made it crystal clear that they view the current project as nothing more than a stepping stone to even more local roadbuilding in the next round of spending, known as RIS2. In essence, far from being sustainable or operating as a standalone scheme, the A57 Link Roads scheme is seen as requiring yet another road in order to make the first scheme work!

Worse still, it appears to solve so very little. The blockage at the M67 junction, caused by Mottram lights, is merely moved halfway down Mottram Moor. Meanwhile, traffic that ought to be staying on the A57 is now magically meant to rat run through Hadfield - either to prevent an Air Quality Management Issue (AQMA) in Dinting Vale or to avoid the queues on the A57, caused by the proposed Link Roads generating and dumping so much extra traffic into the area.

In a nutshell, this is pure unreformed, undiluted, gratuitous roadbuilding that harks back to the golden age of tarmac back in the 60's, 70's and 80's. Mr. Johnathan Reynolds MP made the very point that the "scheme has its roots in the 1960's" confirming its backward-looking nature, in stark contrast with the visionary ambitions of the GMTS.

NH confirmed such sentiment in noting ((REP7-020) at para 3.3 – NH 9.60 Applicant's responses to Examining Authority's Second Written Questions) that the National Trip End Model (NTEM), rather conveniently *'does not include a specific general allowance for transference of journeys to more sustainable transport modes'* and *'it is a national and local government policy aspiration that is not currently backed up by firm strategies.'* In other words, let's build it quickly before any such firm strategies are actually in place that we cannot ignore.

This is quite simply a roadbuilding agency saying we are only interested in building roads, forget all the other stuff. Again, this is in direct contravention to the aims and intentions, let alone the spirit of *'reducing incentives to travel by car'*. NH clearly demonstrate in no uncertain terms they have no intent to significantly reduce motor vehicle traffic nor to incentivize sustainable travel in proposing this scheme.

Further evidence of this was provided at para 3.9 of the same document, in their response to CPRE's proposal for car-free low carbon travel within Longdendale and Glossop ... *'although considered feasible with challenge, current congestion and capacity issues experienced on the route results in a significant challenge in terms of delivering sustainable transport improvements, especially improvements relating to bus services'*.

As an organization whose raison d'être is to build and maintain roads it is understandable that NH only wish to build a road that will lead to even more roadbuilding. However, their nostalgic one-trick pony answer to transport issues does need to be compared and contrasted to more dynamic, multi-faceted, futuristic ideas and attitudes that are more in keeping with the vision of sustainability, inclusiveness and integration and that might at least attempt to utilize the GMTS appetite for Interchanges.

3. Integration with the GMTS

My own idea and understanding of how the GMTS might be embraced would begin with making better use of the existing network, limiting expansion of road capacity as far as it practicable, then using route restraint measures to encourage active travel and building public transport initiatives into the network.

By way of contrast, NH only look at what is before them and what they have done before, so they see *'current congestion and capacity issues'* as a *'significant challenge to delivery of sustainable transport improvements'* then propose surprise, surprise – a road solution. Instead, they ought to accept the challenges in order to deliver those improvements.

4. Golden Opportunity versus Missed Opportunity

For example, take the geographical position of the M67 terminus at Mottram. It is in an such an immensely strategic place that it could be considered to be a gateway to so many local and regional locations. It is on a perfect crossroads to deliver everything on the GMTS wish list and can provide solutions to most, if not all of the interested parties. (See also Diagram on page 10.)

Given the assumption that the Mottram Gyrotory Flow (MGF) as previously submitted (REP2 – 088), was in place, we already have, at very little cost and in very little time the free circulation of traffic due to the removal of the Mottram traffic lights and an improvement in air quality to boot. With so little money spent and so little land taken therein lies an opportunity to progress a potential Interchange that could be used as a launchpad to take passengers in all directions of the compass.

For instance, frequent shuttles could ferry commuters from Glossopdale up the unblocked Moor to a single point where they could make their connection. From here they could access one-stop/limited stop services to their destination, with buses making rapid transits straight down the motorway via Denton onto Manchester, Stockport, Ashton, Oldham etc. The M67 M-way junction is already there, the infrastructure is already in place. We just need to get passengers to their point of embarkation and this is how it can be done.

The Mottram Interchange (MI) could become the point of departure too for commuter services to Sheffield, for enabling trips into the Peak District National Park without the use of cars and/or to support tourism in High Peak. Mottram stands at a crossroads between Manchester and Sheffield, Tameside and the High Peak, so is thus a natural embarkation point for journeys in all directions.

Once established as a point of connectivity, the MI creates a fascinating combination of possibilities for the future of public transport that would enable Tameside in particular to resolve its massive dependency on the car. The GMTS notes in its section on the borough that 69% of journeys that begin within its boundaries are made by car or van, quite a shocking figure but one that can be tackled with vision, a will and a strategy that allows active transport measures the opportunity to thrive.

Commuters to the MI from the parts of Glossopdale that have poor access to rail (Tintwistle, Hollingworth, Gamesley etc) might also be able to make use of regular shuttles from the MI to Hattersley railway station, which is currently massively underused due to it being on the periphery of the settlement, allowing it to finally gain the patronage it deserves.

I have elaborated and dwelt on this point (Agenda p4 Question (I)) in order to try and fully explain that NH neither support the aims of the GMTS or barely even pay lip service to it but also to underline the point as to why my proposal, the MGF, really does need to be fully and fairly appraised – both as a standalone scheme that can be tested in a head-to-head with the Link Roads scheme and/or in conjunction with a package of additional non-roadbuilding measures. In this way it can be evaluated for all the benefits it can bring to align with the aims and objectives of GMTS 2040.

The juxtaposition of Mottram with the M67, Manchester, Sheffield, the Peak Park, High Peak and the towns of Tameside give it a golden opportunity to be the location for a new approach to transport strategy and a test case for turning our backs on so many decades of damaging and destructive road schemes of which the current manifestation, in the form of the A57 Link Roads, is so archetypal.

5. National Highways responses to a Mottram Gyratory Flow Solution

This takes us nicely onto page 7 of the said Agenda, where at (kk), the ExA ask the Applicant to clarify their position as to whether the MGF, or a similar scheme was considered. The NH reply to this question was a definite 'Yes'. However, their earlier written reply, was a very clear 'No', giving us two completely contradictory answers, which, from my perspective, does very little to clarify their position, so I shall deal with each answer in turn.

Again, in document '9.60 Applicants responses to the ExA's 2nd written questions' the ExA set out a series of questions relating to the MGF proposal. The first of these at 3.8 (a) asks: Has the alternative been considered previously?

The NH response is clear and unequivocal – a definite 'No'. To quote: "*Mr. Bagshaw's submission was not one of the potential alternatives identified through the process*". And again "*Mr. Bagshaw's submission was not one of the potential alternative options considered by the NH*". Couldn't be clearer. Therefore, question 3.8 (b): If so, what were your conclusions? - need not be answered and wasn't.

Question 3.8 (c) is actually several questions in one so takes a little more unpacking. The ExA ask the Applicant to: *'Please provide a response to the issues raised. Do you consider that the proposal provides an alternative solution which would satisfy the main aims of the scheme, provide the same or improved benefits and is deliverable'?*

NH's thoroughly unsatisfactory response to this revolves around a general reference to 'Large one-way gyratories' which is a very generalized cut and paste response that is not evidence based and doesn't address my specific proposal for this particular sensitive area. Nor does it make any sense with regards to the concrete reality of the actual situation on the ground that we are dealing with here. I shall explain by specific reference to each of the four points, in turn, that NH make.

i "*The one-way systems can lead to high traffic speeds with poor adherence to speed limits*".

High traffic speeds indeed, wouldn't that be a much better problem to have to deal with? The reality on the ground is that we have low traffic speeds, congestion and poor air quality. These are some of the very reasons for the A57 Link Roads proposal itself!

Thus, if NH are saying that the MGF would lead to high traffic speeds then it appears to be an admission that it works. By resolving congestion and thereby increasing east-west connectivity it has solved the main aims that NH's own scheme attempts to resolve.

Of course, were high speeds to become an issue then there are some fairly obvious ways of dealing with that, such as, speed cameras, average speed cameras or warning signs that flash, such as, those which already exist on the Moor!

Incidentally, in 2008 when the MGF was accepted as Alternative 1 by the previous public inquiry, the Highways Agency (HA) (as NH were then called) also thought that the MGF would work too well. It was they who suggested that the A628 (T) single carriageway between the Gun Inn, Hollingworth and the centre of Tintwistle should be traffic calmed into a 20 mile per hour zone.

ii *"Unless contraflow Bus Lanes are provided bus services are disadvantaged"*.

Irrelevant nonsense. Contraflow bus lanes were introduced to help speed up bus routes that previously sat in heavy traffic, enabling them to avoid congested areas and follow more direct routes to their destination.

The whole point of the MGF is that it will unblock the congested area thus aiding the flow of traffic, rendering contraflow Bus Lanes totally unnecessary. All buses would need is a passenger stop to pull into such as those which already exist at Spout Green, Gun Inn and the Mottram Junction stops.

I might also remind NH at this juncture of the answer they gave to CPRE ((REP7-020) at para 3.4 (9.60 doc again) *"the number of bus passenger, pedestrian and cycle trips (across the modelled network) will be very small compared to the number of vehicle drivers and passenger trips. Consequently, it would be unlikely to have a material impact on the assessment of the scheme"*.

iii *"Cyclists are disadvantaged unless separate segregated facilities for cyclists are provided that bypass the one-way system"*.

As a cyclist myself I am fully aware that all cyclists require are crossing points which already exist at various points already, for instance, at Back Moor, Hollingworth and Tintwistle. May I also remind the NH of the answer they gave to CPRE at para 3.4 as previously stated above. Mitigation is also a tried and tested tool that is often able to resolve local access issues

iv *"Local access can become convoluted due to the one-way system"*.

This is the only one of the four cut and paste responses from NH that merits a genuine reply, since there is a ring of truth to this. In response I would say this. Back in 2008 when the HA were directed by the Inspector to mock-up the MGI to prepare it for public consultation, they went through the scenario with me in fine detail to prove that each of the affected homes would have access to the local road network. Again though, any such problems, should they exist, can usually be dealt with via mitigation.

Thus, I have shown that each of the four rebuttals from NH are generalized, largely trivial in nature, unsubstantiated by any evidence and might well be easily mitigated. This stands in stark contrast to the huge problems that their own scheme entails which has already required months of attempted resolution.

I should like to further respond to NH's general, vague point, that:

'Large one-way gyratories ... are not considered appropriate solutions and are frequently being retrospectively removed from the road network'

Each traffic problem/ situation is different and unique. Different challenges have to be overcome by different methods that are the best fit for the area and its road network. That may be a single one-off solution or a package of measures but has to be appropriate to the area in question. Thus, it is quite meaningless to speak in general terms

In this particular instance, I am proposing for the most part to utilize the existing road network that is already effectively a two-lane gyratory in each direction for much of the length of Mottram Moor. I wish only to complete the loop with a small strip of road from the M67 junction to Back Moor, in order to free up the circulation as explained in my Deadline 2 submission (REP2 – 088).

In a more general response to their argument about gyratories, I note that they provide no data, statistics or any other evidence to support their assertions. There are, however, plenty of counter examples to refute what they suggest.

The Leeds.Gov.uk website reveals new plans to improve the Armley Gyratory, for example by providing more accessible routes for cyclists and pedestrians and improving road safety for all. This clearly demonstrates how gyratories are flexible enough to build in improvements for public transport and active travel through mitigation, adaptation and amendment.

More locally, Barnsley, a mere 20 miles away, have recently introduced a new gyratory on Dodsworth Road which utilizes double yellow lines and a clockwise system to improve traffic flow. A local measure to solve a local issue, exactly as I propose.

NH will find it very difficult to name a single example in which removing a gyratory has actually improved traffic flow – quite simply because they work and are flexible enough to allow other measures to be built in or bolted on.

Finally, on this, NH state that *'large gyratories are not considered appropriate solutions'* yet, as I will demonstrate, they go on to contradict themselves on this very point. In giving their alternative 'Yes' answer they admit that they did in fact consider the MGF to be an appropriate solution, to the point where it became one of only three shortlisted Options!

After being so clear and lucid that they had not considered the MGF, at 3.8 (doc 9.60) they are then asked by the ExA at page 7 of ISH 3 Agenda, question (kk) to clarify whether my scheme,

or a similar scheme, was considered. This time NH give a different response, which is a straightforward 'Yes' but without any context or evidence, so let's try and break this down.

We are to assume that NH have not assessed the MGF as a standalone scheme since they have admitted that in their first reply. What is different in the question at (kk) are the words '*or a similar scheme*'.

When, where and how then, was the MGF assessed and then eliminated according to NH? Some answers and some transparency would be welcome from them at this juncture.

There is no evidence in the document entitled 6.2 Environmental Statement Non-Technical Summary, dated June 2021 (pages 15-16) that any gyratory was ever considered. It mentions sustainable transport measures, a Trans-Pennine tunnel, climbing lanes, links roads, bypass and HGV control measures but nothing about any gyratory. Therefore, at what point has the MGF been assessed and removed from the sift, on what grounds and with what supporting evidence?

6. Consideration of the MGF within the Trans-Pennine Feasibility Study

However, in their Environmental Statement document (REP2-005) at page 100 Table 3.3 (23 Options assessed at the initial sift) the MGF was described as the '*best performing individual option against the sifting criteria and for meeting the objectives for the Scheme*'. It was also described as deliverable and feasible.

At 3.3.19 in the same document the MGF is now one of just three local schemes to be shortlisted performing as well as the Link Roads scheme and being outperformed only by the Mottram-Tintwistle bypass. How then does it get eliminated, justly and fairly?

As stated in my written submission (REP-088) there is a Department for Transport (DfT) report from March 2015 entitled Trans-Pennine Feasibility Study, which I append to this submission as Appendix 1. It is the only reference and evidence I have found that appears to assess the scheme. I assume then, it is the same one that is described above. Its results were very favourable.

I further submit as Appendix 2, the Stage 2 Report of this same study (Annexes – Annex 1) dated February 2015. In the 4th line of the table the MGF option scored highly across all criteria as a standalone option. If this is the assessment that NH are relying on to say it has been appraised then it could have not have been eliminated on this evidence.

In fact, the Feasibility Study goes on to state (at 5.7) that '*only those potential interventions that performed strongly against the sifting criteria were selected for further consideration, using the Department for Transport's Early Assessment and Sifting Tool*' and '*following this assessment of options it became clear that a small number of better performing options should be considered further*'. Namely:

- 1 A bypass of Mottram-Hollingworth-Tintwistle
- 2 The Mottram Moor Link Road
- 3 An A57 Mottram one-way system – a one-way eastbound link from the M67 to the A6018; one-way operation on the A6018 to the A57 and one-way operation westbound on the A57 to the M67.

At 5.8 it adds that *'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'*.

At this point in the procedure (para 5.9) it was decided to assess the MGF not as a standalone scheme nor in conjunction with other sustainable measures (as HA were wont to do in 2008) but in conjunction with a package of measures which included first and foremost *'a link road between the A57 (T) and the A57 in Glossop'*.

In other words, all three of the 'option' packages were road based, capacity expanding packages. Thus, the whole point of my scheme, which deliberately tries to minimize expansion of road capacity in favour of utilizing the existing infrastructure to best effect, has been missed.

In fact, the only reason that the MGF did not come out top was precisely because it did not increase road capacity – this was the whole point of the scheme, a point that I have made repeatedly.

The MGF should have been assessed, if with anything at all, then with sustainable travel measures that might include route restraint, public transport initiatives and active travel measures. The MGF as a gyratory is flexible enough to build such measures into it.

Consequently, I do not feel that the MGF was ever assessed correctly or fairly and I should like once more to request for it to be rigorously assessed as an alternative, either as part of this Inquiry or prior to the further advancement of this Inquiry.

I further note that if this is indeed the 'assessment' that NH refer to for eliminating the MGF by appraising it as part of a 'package of measures' that included the link roads, then not only did it misrepresent what I am trying to achieve but it also ensured that all three 'options' it wished to advance, were roadbuilding schemes, deliberately designed to expand road capacity.

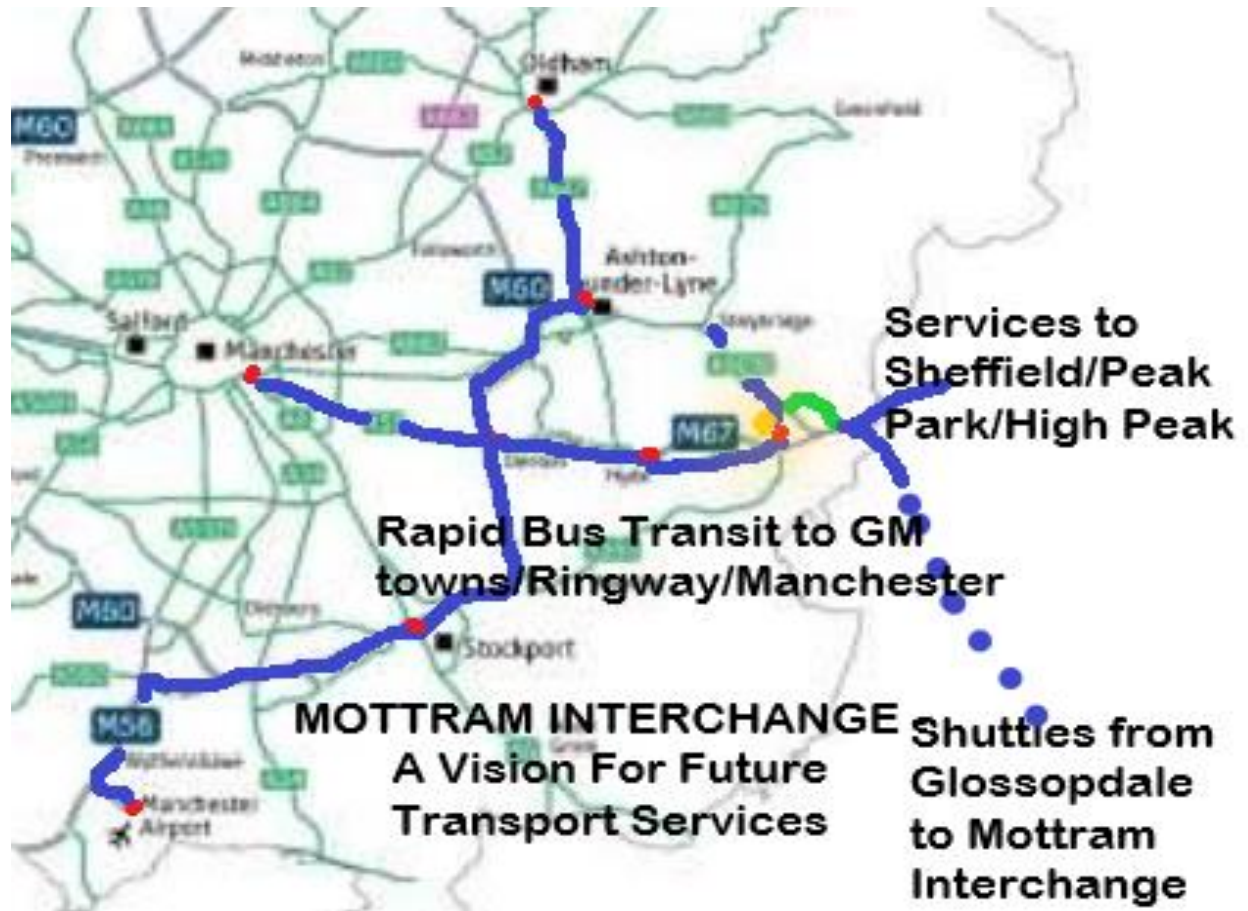
Thus, when Tim Nicholson of Peak District National Park commented at 3.27 in their recent response to the ExA's 2nd written questions (WQ2) regarding their concerns that *"the Applicant does not appear to have undertaken a thorough assessment of alternatives to the scheme, that are not based around increasing road capacity"*, then I think this may fully explain why!!

In conclusion therefore I should like to ask the ExA to examine the need expressed in NPSNN to consider hitherto unconsidered alternative proposals. I believe that the MGF with its small added road element and in association with modal transfer, is certainly a viable alternative that

has not been previously appraised as an option and which is permissible in accordance with paragraph 4.27 of the NPSNN.

For further clarification, at 5.10 in the Feasibility Study and in its summary on page 14, it is stated that all elements of the package within which the MGF was contained (Option 3) were deliverable. NH also confirm the same (Rep2-005) at Table 3.3, so neither its feasibility nor its deliverability is in question.

Diagram To Illustrate the Potential of Mottram to Deliver Public Transport Initiatives.



Yellow = Mottram Interchange

Green = M67 terminus to Back Moor

Blue = Potential rapid routes

Red = Key destination points