

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

Peter Simon (A57L-001)

**Comments and Response to Deadline 8 submissions (Derbyshire County Council and National
Highways) to Examination Deadline 9**

(Abbreviations at the foot of this submission.)

1. These comments are made partly in the light of my D8 submission (**REP8-039**) concerning the ongoing disparity between the positions adopted by the DCC individual representative and the County's Local Impact Report's "issues and concerns" as yet unresolved. I have to identify the issues against a backdrop of ambiguity accordingly.
2. I understood from the ISH3 that the Examination had commissioned (- at whose and what cost unknown? -) the suggestion of a "Select Link Analysis" for the DCC LIR A57 bottleneck Junction 3 at Shaw Lane. This to be undertaken by the following authorities jointly; DCC, NH and HPBC. The junction operation here being central to the assumption of the Scheme model for traffic to avoid the A57 through central Glossop and its AQMA.

Also according to DCC (**REP8 – 023**) further work may be undertaken regarding traffic signal optimisation on the A57 around the general Brookfield vicinity though I understood the model already included this? Initially at the ISH3 the DCC representative proposed a "Select Link Analysis" but this may have morphed to mean something else? Such as an exploration of further "*Signal Optimisation*" or a "*sensitivity test*"? Its hard to be sure from their latest D8 submission. Also (**REP8 – 025**) High Peak record that there are to be discussions between parties about further "*sensitivity tests*".

Actually its all fairly unclear what is being considered between the statutory parties here! Not really satisfactory when the findings and outcomes are committed apparently for the next Deadline 9 of 27 April which is very late for scrutiny.

Whilst hopefully work of evidential value it seems apparent that to understand the related local network traffic in the area it is inconsistent to simply examine one route in detail, without the outcomes being similarly known on associated local routes, including the now acknowledged "Hadfield Alternative" (**REP8 – 018**) (Deadline 8 Submission - 9.74 Comments on Deadline 7 submissions P60 - Part 2 of Response to **REP7-042** Peter Simon RE "*The A57 and North Glossopdale - incomplete traffic modelling for filtering traffic*").

The approach here lacks consistency, and can only really be at best inconclusive because it excludes the overall detailed modelling I advocated. Modelling for example

that would identify the threat to the villages of Hadfield, Padfield (and by extension Old Glossop) shown in the DCC LIR.

3. What is known, is that without a Scheme (ie, in a “Do Minimum” situation) the modelled traffic increases under study simply would not arise wherever the travel was between. Similarly the signal optimisation consideration where last minute proposals are anticipated, will be unlikely to impact much as the traffic growth levels remain contained. Whatever these further studies find or propose it remains strongly probable to a point of certainty that if the capacity does not safely exist to accommodate the LIR Junction 3 Shaw Lane diversion as proposed the model supporting the Case for the Scheme is no longer intact. That has obvious implications for the Application.
4. At WQ2 (**PD – 012**) the ExA asked the Applicant if they had considered these implications regarding the viability of the Scheme. The Applicant have advised at D8 (**REP8 – 018 as above**) they had conducted a Worst Case Scenario assessment maintaining an ongoing belief over the safety of the AQ position contrary to that of the LIR and HPBC. They seem here to rely fully on their original ES evidence and on the model’s claim that local roads can accommodate increased traffic diversions of between 15% up to 50% on identified local streets or “rat runs”. I continue to think as do others at the Examination that this is unrealistic and resolution of this point is I would have thought key to the survival of the Scheme’s case as it presently stands. My case continues to be that AQMA remains potentially in need for assessment for unacceptable potential AQ infringements and exceedances and to reiterate the scheme modelling should without question extend down meaningfully to more of the Local Traffic Network in Glossopdale.

It is still not clear, as further cost for studies does not seem a consideration, why this recommendation has been ignored. I note that NH in a response to me (at **6.2 P61 REP8 – 018**) claim an assessment has been performed that concludes no detrimental impact on larger and lesser routes through the villages identified.

“The impact and consequential effects of the additional traffic due to the Scheme on both the B6015 Norfolk Street/Woodhead Road, Cemetery Road, Park Road and Hadfield Road (Hadfield Alternative) and the B6015 Norfolk Street, Talbot Street, Dinting Road and Shaw Lane routes have been assessed by National Highways. The conclusion of this assessment is that the additional traffic on these roads due to the Scheme does not result in any adverse effects significant enough to trigger the need for any mitigation.”

However they give no reference which rather undermines that assurance. Could I ask here formally therefore that NH be requested to supply at the earliest opportunity the exact reference(s) in their evidence on which this reply and assurance relies?

5. Arising from the Examination process it now appears (**REP8 – 023**) that DCC mainly concede a controlled crossing intermittently halting traffic will be required on Dinting Road to protect schoolchildren in particular, rail commuters and other members of the public generally. Regrettably DCC response here is characteristically unhelpful for the Examination as it continues the pattern of ambiguity present at the ISH hearings, answering obliquely rather than directly. It requires close analysis to obtain what is however a sufficiently firm conclusion.

Their Deadline 8 Submission initially reads as there being currently being no current requirement for a formal crossing below the rail station to the east on Dinting Road. At Page 5 it is said;

“The County Council acknowledge that the applicant has provided some indication of potential changes in traffic flow on both Shaw Lane and Dinting Road together with a number of local roads in the area although the County Council does not consider on the basis of the information provided that there is likely to be numerical justification for the introduction of a controlled crossing at this stage necessitated by the scheme.”

But then immediately that position is significantly qualified if not overturned, as an “update” since the Hearing reveals that, with senior level County Network Manager involvement *“These discussions and further investigations have identified that the County Council has secured developer contributions funding for a controlled crossing on Dinting Road, which is to the left of Station Approach”*. (P5).

A County Highway Response then comments further and ultimately this confirms sufficiently the inevitability of the crossing:

‘The Highway Authority has received several complaints about the crossing point on Dinting Road, including from the MP and a Glossopdale School Governor. The Transport Statement dismisses this road as not being “heavily trafficked” despite describing it as a key link between Glossop and Hadfield, an access to the rail station and being a main bus route. It is a well-known and well used rat run in the town to bypass the regularly congested A57 corridor. Bearing the latter and aforementioned complaints in mind, it’s considered that any approval for expansion of the school should secure funding for investigation in to, and any subsequent installation of, a zebra crossing at this location.’ (P5)

DCC’s statement read as a whole leaves little doubt there will be a formal crossing of some sort at this location and the evidence* strongly suggests it will require signal enforcement that significantly halt the traffic. (*See Page 4 – *“The Inspector noted also that it is in the vicinity of Dinting station, on a section of highway that is of poor horizontal and vertical alignment”*.)

This is important in the context of the Examination because in a reply to me the Applicant makes the following acknowledgment of the consequence of such a development, which would be to significantly undermine the authority of the model, albeit with unknown consequences. **(REP6-017 P61 7.4)**

For the routing of traffic across the modelled road network to significantly alter from that forecast by the traffic modelling, physical measures or schemes would need to be introduced onto the road network, such as changes in speed limits, traffic calming measures, additional traffic signals, etc., that would cause drivers to choose alternative competing routes. Any such proposed modifications to the road network would be subject to an impact assessment prior to their implementation that would need to consider the diversionary impact of the scheme on traffic and the consequential environmental effects. No such schemes for Dinting Road and Shaw Lane are proposed.

Though the Applicant does not accept that this would necessarily mean consequences for the A57, it probably will, and consequences would also need to be assessed for impact elsewhere. So this is a situation with bearing on their model which now by the Applicant's own admission needs to be addressed in the light of the school expansion in progress and the extra burden of the Scheme's traffic on this road.

6. Considering the matter cumulatively therefore the preferred diversionary route of Dinting Road envisaged in the modelling appears to be superseded by events. Specifically impediments to free flow on this route now realistically include
 - An existing informal one way system currently enforced by motorist consent on Shaw Lane
 - Followed by a required future formal (zebra) crossing of some nature (probably requiring light controls for safety.)
 - Further interruptions to flow from multiple entrances/exits from sizeable new developments approved in the vicinity and extending along the entire route. (These are committed developments acknowledged by the NH model)
 - Also existing train station and associated private parking entrances/exits

There is photographic evidence for many of these circumstances before the Examination as supplied by Mr Bagshaw **(REP2-089)**

In a WCS modelled assessment these impediments must particularly be viewed in the context of congestion at peak times, notably the exit of children from school and the morning and evening "rush" hours. Any suggestion of only an additional 1 car per minute here as from the DCC current representative (**REP8-023, P4**) is I suggest totally disingenuous and dangerous.

"We see that on the roads in Glossop away from the A57 changes in flow of typically around 1000 movements daily. Over, say a 16-hour day, this equates to 60 an hour or one a minute, consequently, the County Council believes that changes in flows arising from the scheme are largely imperceptible" - .

It is the peak period traffic that that halts flows, and leads to congestion, and so to the worst case scenario, not an average over 16 hours.

To summarise irrespective of new studies and tweaks to traffic signals the evidence is likely to continue to show that the Case for the Scheme is no longer fully intact as the modelling regarding journeys diverting off the A57 falters under scrutiny. Furthermore the Applicant themselves acknowledges the implication of any new road infrastructure for the traffic model, in itself a potent argument for a remodel as it is reasonable to conclude the future zebra crossing on Dinting Road as a given.

7. In view of the latest evidence I would reiterate the response position of Scheme support seems to be that there is no better alternative, and that any Scheme however toxic and poorly conceived is better than no scheme at all. This is summarised in the DCC ISH3 Summary (**REP8 -023**) which adopts classic tunnel vision to assert “business as usual” with a continuing cycle of car dependency and its acceptance.

I say this because here it is stated again rather disingenuously (Page 3 **REP8 -023**) -*“They will travel by a variety of modes, ideally walking, cycling and public transport however we need to be realistic to the fact that some of whom will travel by car”*- while further text claims, whether rightly or wrongly, that the extra traffic (the DS less the DM) will be locally generated. So the Scheme will in their view generate a high proportion of new local car journeys and they seem if not to welcome that, then quite resigned to its inevitability!

Their representative’s comments taken as a whole from ISH2 onwards suggests to me they would prefer to dispense with Examinations altogether and to view Climate Emergency Declarations of 80% of Derbyshire Authorities as for appearance’s sake only. They are also at odds with their own Local Impact Report, its unanswered questions and additional unanswered responses for their WQ2. So the LHA position as currently represented at Examination, whether underwritten or not by the executive, is untenable on many counts really.

8. As I have consistently represented there is and has been a high scoring alternative on the table to be considered which has the advantage of buying time to make possible a new critically needed transport deal for Glossopdale and beyond. The traffic issues locally have never really been sifted or analysed for a solution other than major roadbuilding, so opportunities are being missed. A notable feature of Glossop’s spatial identity currently is its lack of public transport links and over reliance in that regard on a single rail line to Manchester. The Examination has demonstrated a marginalisation of bus transport over time and the shocking run down of its operation to make it a poor relation, even to the extent that apparently the NH model fails to take account of the Scheme’s impact on the option of bus trips. (Keith Buchan/CPRE generally, eg

REP7-036) When bus journeys simply require meaningful support to have the potential to be at least an indispensable equal public transport partner.

9. Stations on the Hadfield/Manchester line tend to be casually cited in every application for development locally, whether large or small. Notably for example Tameside's Godley Green Garden Village proposal for a completely new settlement of circa 10k persons (2.5k dwellings) significantly references passenger load expectations at Hattersley and Godley stations. An appropriate study of rail capacity at peak times would reveal the expectations for rail cumulatively are increasingly unsustainable, and need future proofing with alternative provision before it is too late and there is nothing left to the public but car travel by road. The current opportunity is thus a critical one.
10. The Scheme is neutral towards bus transport I would suggest, perhaps slightly negative it has been suggested, with regard to potential future usage. Whereas CPRE with Keith Buchan have suggested making the bus a favourable option. They identify a number of excellent opportunities to correct the imbalance in local transport provision and show how buses which could be electric - (for example swift single deckers that now exist with wi-fi and cardless payment) - are entirely compatible with today's world. If CPRE are listened to then bus travel for individual journeys does not need to be the poor relation it has been allowed to lapse into; it can be the transport of choice given appropriate support of local and regional TAs. (**REP2-070**) CPRE Peak District and South Yorkshire Branch Deadline 2 Submission - Written Representation Appendix A - Car Free Low Carbon Travel for Longdendale and Glossopdale)
11. Moreover Mr Bagshaw has suggested a possible option of a Mottram interchange within GMTS as an additional critical public transport link coupled with a one way gyratory around Mottram. Such an offer would with time and investment open up enterprise and individual employment opportunities across the conurbation including the airport (with the caveat that only moderate air travel should be encouraged). Currently to journey to South Manchester by public transport involves a long trip into Manchester and then out again so numerous and mounting car journeys are now made on increasingly over loaded roads. An Interchange could be developed to offer a significant public transport offer to alter this unsustainable cycle of car dependency whilst creating new opportunities for enterprise and employment by good planning provision. It could service major appropriate housing in the area that otherwise will be mainly car dependent. This opportunity for change should be seriously considered I feel.
12. Climate Change has been a major topic at the Examination but if the term "*emergency*" is not being lightly and gratuitously used this is realistically the last chance locally for a transitional transport deal towards something resembling a viable alternative to an quite unsustainable future. I would agree with Mr Bagshaw (foot of

P3 REP8 -042) that it is a case of major opportunity, or gross failure, facing decision makers here.

13. This makes all the more compelling the need to establish to what degree a hybrid modal scheme with only a minimal road building component has been properly assessed by the DfT against the Scheme objectives. My reading and understanding of the documents available leads me to conclude this has not been the case and that it is perhaps the only viable solution here, which should be considered in full and in fact before this Examination concludes.

Abbreviations

“D2 = Deadline 2, D3 = Deadline 3 etc

DCC= Derbyshire County Council

HPBC = High Peak Council

ISH = Issue Specific Hearing

ExA = Examining Authority

LIR= Local Impact Report

NH = National Highways

TAs = Transport Authorities

WCS = Worst Case Scenario