DEADLINE 10 RESPONSE – PETER ROBINSON

Unique Reference 20029394

1. My concerns are with the impacts of the A57 Link Roads on the A57 Snake Pass.

2. When I objected to the scheme in my relevant representation I expressed amazement that Highways England can bring forward a scheme that impacts so adversely on local roads in the Hope Valley. That amazement remains and is now accompanied by disappointment. Through the Examination I expected the impacts on the increased number of crashes, on the peace and quiet of one of the wildest routes through the National Park, on the wildlife and the special habitats to be thoroughly interrogated and addressed. I also expected misleading and inaccurate statements to be challenged – but there is no sense of challenge or even of pressure on Highways England, only attempts to mitigate the impacts so they can ultimately be dealt with as 'addressed.'

3. The Snake Pass is a winding narrow road. It has many blind bends and poor sightlines. It is a popular route for cyclists. It has access to large areas of open access land and many footpaths that subtend it. The footpaths may not immediately join up so walkers have to use the road which is largely without verges. Stock from farms along the route regularly escapes and can be found on the road. The route is also subject to landslips which regularly close the roads – there are three now awaiting remedy with single file traffic and traffic signals on all of them. Flooding after heavy rain makes the road passable only at its centre in certain places. Consequently it is a route with many hazards before there are any vehicles on it.

Forecast increased traffic

4. In my initial submission I expressed great concern that traffic on the A57 Snake Pass is forecast to increase due to the Scheme by 38% or 1,450 vehicles per day, which is equivalent to approximately an average of 2 to 3 vehicles per minute in each direction. However, such concerns have been dismissed by Highways England who deem this increase as insignificant because of the already 'high' number of vehicles using the route (3050 AADT). They dismiss the impact of this increase on peace and quiet on the basis that peace and quiet is already lost because of existing traffic on the road – an absurd argument which implies that once a certain level has been reached, numbers can be allowed to increase without limit. In fact, the statutory purposes of the Park require peace and quiet to be restored by reducing traffic, not harmed further by more traffic. An hourly analysis of the traffic flows has revealed bunching with more traffic (52% increased flows as opposed to the average 38%) late morning and early afternoon, the time when most people would be enjoying the Park. This means that the increase in noise, loss of tranquillity and the accident risk

would be greatest at the time of greatest number of visits when people are trying to enjoy the Park.

5. The impact on people crossing the road between footpaths or open access land was assessed with a gap analysis. This misses the point. There are few pavements alongside the road and walkers may have to walk the road to link up with paths and access points. Gap analysis also has no bearing on cyclists who are using the road.

6. The impacts of the increased traffic on tranquillity have been reduced by Highways England to 'noise levels' which tell you little about tranquillity, a concept that they have failed to address. Highways England states *'When vehicles travelling along a road are grouped together, in a platoon, the noise from individual vehicles within the group is usually less noticeable from the overall noise of traffic on the road as the vehicles in any group tend to be driven in a similar manner.'* [REP8-019] Clearly Highways England has never used the Snake Pass. Platooning results in vehicles revving up and overtaking at speed, particularly drawing attention to the traffic on the road.

7. Highways England said no restraint had been applied to traffic across the Peak District – why not? If the statutory purposes of the Park require its natural beauty, wildlife and cultural heritage and public enjoyment to be enhanced why is traffic not being decreased? It makes no sense to pursue a scheme that does the opposite to what the statutory purposes require.

Forecast risk of increased crashes

8. Highways England dismisses an extra 160 crashes on the A57 Snake Pass alone as insignificant and claim that the benefit of faster journey times outweigh the negative impacts of increased crashes. I find this incomprehensible and outrageous. It is particularly unacceptable as the Snake Pass has a falling trend in accidents due to the effective measures already implemented by Derbyshire County Council (see Figure 4-7 in REP2-090 page 38/790).

9. Initially Highways England dismissed any responsibility for safety and had no regard for regular users of the routes such as residents. Through the Examination the County Council has suggested the installation of average speed cameras and Highways England has offered to help with measures to mitigate the effects of increased crashes. However, I object to such a measure being forced on the National Park as a direct consequence of an ill thought through scheme. The average speed cameras would mar the route with intrusive gantries and signs – they cannot be concealed, they are meant to be seen. This type of major development is not

allowed in the National Park except in exceptional circumstances and I am pleased to see that the Peak Park does not want cameras either.

10. Furthermore, Highways England now appears to be planning to reduce the modelled number of accidents, apparently to minimise the issue. We understand that crashes increase in a linear fashion with traffic increases. If there is a 38% increase in traffic then it follows there must be a 38% increase in crashes. Any attempt to 'update' the model outside of public scrutiny is viewed with great suspicion.

11. Equally, the suggestion that the accidents largely involve motorcycles is wrong; Police statistics on crash incidents on the Snake Pass show they largely involve cars (see REP2-069) so a change in motorcycle numbers should be immaterial to the risk of crashes.

No confidence in the traffic modelling

12. Finally, in my relevant representation I queried the confidence that could be placed in the traffic modelling. I read that others also are challenging the outputs of the model. With respect to the Snake Pass the flows that Highways England have modelled for 2025 without the scheme are 3,050 vehicles daily. No baseline of observed flows is provided. In 2015 Average Annual Daily Traffic flows were published in the Transpennine Feasibility Study (see map below taken from the Stage 1 Report). This shows 4,082 vehicles daily, a figure which is based on Highways England's own TRAD database. The press release from Derbyshire County Council on 28 March 2022 quoted average flows for the whole week of 33,000 vehicles daily which is about 4,300 vehicles per day. These flows are based on a counter on the A57 halfway down the hill towards Glossop. Surely observed flows from two reliable sources that are 38% greater than modelled flows should ring alarm bells. Such a difference is significant and necessitates further scrutiny.

13. This is important for if the modelled flows are underestimates then Highways England's assessment has also underestimated by a considerable margin the risk of crashes, and the negative effects on tranquillity, on people, on wildlife and on the landscape. In my view the scheme should go back to the drawing board, and undergo proper scrutiny of the traffic modelling using an independent assessor.

Conclusion

14. The Snake Pass is a remote road passing through one of the wildest parts of the Dark Peak – the Kinder Bleaklow Plateau. The experience here should be conserved and enhanced by reduction of traffic flows. This is a bad scheme which does the

opposite; it increases traffic, decreases tranquillity and increases danger to walkers, road users and wildlife. Please do not let it go ahead.

Figure 5-3 – Average Annual Daily Traffic