

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

Peter Simon (A57L-001)

The Applicant has responded at **D10 (REP10-010)** to my **D9** Submission (**REP9-049.**)  
My **D11 Response** to this is below.

1. Joint Letter
  2. Applicant's casual and non-specific approach to significant local road network impacts
  3. Scheme's failure to address the "Root problem" of traffic growth
  4. Alternatives
  5. Procedural point concerning late evidence at the Examination.
  6. Abbreviations
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1. Overall in response to the Applicant's comments I would refer to the Joint Letter submitted by CPRE to which I was a co-signatory. (**REP10-017** Deadline 10 Submission - Letter to the Examining Authority from Interested Parties).  
  
This letter shows reasoned scepticism over the overall Scheme modelling on which the Applicant continues to rely. The concern therefore extends to a doubt as to legal and policy compliance especially as regards Air Quality and AQMA infringements. Also by extension in many other areas of legal and statutory importance as for example impacts on the National Park.  
  
The "Letter" also addresses the clear need for the Scheme to extend the traffic model down to cover North Glossopdale. Specifically the Scheme relies on diversions and rat runs but they are not clearly identified in full, or modelled with sufficient precision. The lack of detail is concerning. *" A full assessment of the impacts on the road network in Glossop, Hadfield and Padfield must be presented to the Examination and be subject to challenge and scrutiny in the normal way. Without this the ExA cannot assess the adverse impacts of the scheme."*
  2. Here in this D11 representation I further consider the lack of precision and selective indifference of the Applicant's approach to impacts on the affected road network outside the immediate DCO area. In the Applicant's response to my **REP9-049** it emerges that an assessment they claim to have made of impacts of the Scheme on local villages in fact cannot be identified. The Applicant therefore simply falls back on a claim of "professional judgment" again notably unreferenced and simply anecdotal. NH can produce no reasoned case with evidence that any meaningful or safe conclusion has been reached here.

(REP10-10

9.84.38)

4. The National Highways conclusion for the Scheme assessment that the additional traffic 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 due to the Scheme does not result in any adverse effects significant enough to trigger the need for any mitigation has been arrived at using professional judgment based on the absolute forecast changes in traffic flows as predicted by the traffic modelling, which are relatively small.

The “generality of response” continues when faced with the cumulative impediments to their required Dinting Road diversion which I listed in (REP9-049) and to which may be added the Traffic Calming measures/ speed humps identified along the length of the route by Mr Bagshaw (REP9-051) They seek to reduce the clear current and future unsuitability of the route for major diversion to a matter of junctions only. This is tantamount to denial.

(REP10-010)9.84.40

6. Junction delay is generally the most dominant factor in journey times across the modelled road network, rather than average speeds along roads. Journey times in the base model on key routes have been calibrated against observed journey times, therefore the impact of any on-street parking on traffic flows will inherently have been accounted for in the model. Consequently, the presence of on-street parking is not anticipated to result in any significant change in modelled journey times or effects on noise and air quality even with the forecast increases in traffic flows due to the Scheme. Also see National Highways response (7.4 - REP6-017).

However even in this limited respect it is obvious that overlooked junctions such as Shaw Lane and the highly dysfunctional crossroads with poor sightlines between Hadfield Road and Newshaw Lane, are clear impediments that are not properly accounted for in NH projections. Also the junction at the foot of Hadfield Road with Woolley Bridge Road should be noted where visibility is a particular issue. As the co-signed CPRE letter shows the modelling has simply not extended down to the required level of consideration to “safeguard the villages of Hadfield and Padfield”.

*“Government guidance TAG Unit M3.1 specifically states that roads in residential areas ‘especially rat runs’ should be assessed. DCC and HPBC have expressed their concerns. ‘Villages of Hadfield and Padfield should also be safeguarded to prevent rat running traffic trying to avoid the strategic road network’ (REP2-051 3.22 and 14.4 response to WC1; emphasised by REP9-033). (P5 of Deadline 10 Submission - Letter to the Examining Authority from Interested Parties)*

The same casual and imprecise approach is taken towards the requirement for a pedestrian crossing on Dinting Road and the further impediment it places against diverted traffic flow. Having first acknowledged such a development as an obstacle to their plans which would require reconsideration on their part, (REP 6-017) Page 61 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.

the Applicant now backtracks to shift their position and seeks to minimise expectation of its use simply on the basis of an opinion that it would be “highly unlikely”.

#### **REP10-010 9.84.39**

5. The Scheme does not result in increases in traffic flows along Dinting Road sufficient to trigger the need for any new controlled pedestrian crossings. When the assessment of the Scheme was undertaken there was no committed scheme that included a new pedestrian crossing across Dinting Road. Consequently, the traffic modelling for the Scheme does not include such a crossing. However, any controlled pedestrian crossing across Dinting Road in the vicinity of Dinting station is very unlikely to be called sufficiently frequently to result in any material impact on average hourly vehicle journey times along the Dinting Road/Shaw Lane corridor, since pedestrian demand will be very intermittent. Thus, inclusion of a controlled pedestrian crossing on Dinting Road in the traffic modelling would be highly unlikely to alter the forecast routing of traffic across the road network.

This is not of course the previously self-required re-assessment because the inconvenient evidence would suggest very much otherwise. Not only does the peak hours school commute require frequent use as the Inspectors noted at ISH3 (**P2/3 - EV-042**) but the major committed developments which are to face onto the road rely in Transport Assessment terms upon regular pedestrian passage across the road to Dinting station. Again the Applicant have failed to extend down their scrutiny to the actual on the ground situation in the present and near future, so as to continue to be in denial of the problems here. Desk top studies with historic vehicle counts and journey times misunderstood the true picture.

### **3. The Root Problem**

The collective letter from “CPRE and others” (**REP10-017**) implies a deep failure of the Scheme to consider the root of the transport problem here which is long term unrestrained traffic growth and a “Predict and Provide” road building culture that belongs to a different era.

8. The Scheme does not preclude the future introduction of improved public transport services. The number of trips that could potentially switch from car-based to public transport, even with a very significant improvement in public transport provision, is unlikely to substantially alter forecast traffic growth outside of and between large urban towns and cities, which the Scheme is designed to accommodate.

(P49 - Deadline 10 Submission - 9.84 Applicant's Comments on Deadline 9 Responses 9.84.41 – **REP10-10**) As the Examination has shown the Applicant relies heavily and unjustifiably on a speculative transition to Electric Vehicles as a debatable climate and AQ response to enable persistence with uncontrolled traffic growth. Much of the Applicants later DS projections for the Scheme assume a switch to an exclusively battery powered vehicle fleet about which there can be no certainty. This is ultimately aspirational and another

example of a failed attempt to force an ill-fitting Scheme into the “Cinderella Slipper” of approval.

The Applicant has presented Do Something or Do Minimum scenarios but not one for “Do-Something- Else”. (Ps1/2 Letter to the ExA) The Scheme unrepentantly acknowledges and promotes unsustainable traffic growth at both 9.84.37

3. Traffic growth is not contained without the Scheme. There is a greater increase in the forecast displacement of traffic from the main road network to unsuitable alternative roads across the wider area than with the Scheme, just with less traffic growth along the A57

and again at 9.84.41

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“Predict and provide” remains the approach even when the will expressed at national level to reduce this is incontrovertible. *“The model may be based on a methodology, long applied by the Applicant on schemes for traffic assignment, but it is unsuitable for assessing travel as a whole in the context of new policy such as the national Transport Decarbonisation Plan (TDP), Bus Back Better, Gear Change, and Greater Manchester’s Right Mix.* (P2 - Letter to the Examining Authority from Interested Parties **REP10-017**)

So the drive is on nationally and regionally to find more suitable transportation solutions alongside the enhanced opportunity presented by a significant post pandemic shift to work from home. Rather than a misconceived traffic growth offer, a “Do-Something-Else” package should be presented and assessed to firmly address the root issue of unrestrained traffic growth and reflect the need to respond immediately to the declared climate emergency. These things cannot continue to be left as the Applicant would wish. To move in the inappropriate “business as usual” direction is no longer acceptable.

As I have stated previously (Page 5 **REP9-049**) there is an unrealistic expectation of rail locally to underpin all housing development and I would also note transport fares have crept up to an unacceptably exorbitant level. This is not only in rail but across the entire public sphere which perversely steers users away towards private travel. Other parties have noted the need to prioritise better and structured bus provision in the area, (notably “Sharefirst My Journey to School” and CPRE) and I would hope their view would extend to supporting a subsidised fare programme.

Yet with this Scheme road based public transport remains even more the poor relation so obviously simply tacked onto the Scheme as an afterthought. To allow such an approach represents an acceptance that car dependency can continue to spiral locally and indeed nationally to the point where it is out of control and dangerously beyond remedy. So the Examination offers a critical opportunity to address this challenge through its recommendation and apply the necessary vision to mitigate the problem.

#### 4. Alternatives

Parties have brought forward alternatives to the Examination, including Mr Bagshaw’s proposed Mottram Gyrotory Flow that seeks to deliver an optimal solution for the SRN, the local communities, and the highly sensitive environment. To leave behind the fatal “Predict and Provide” mindset these Alternatives should now be fairly explored in their own right, and not simply as part of a major road building proposal. Such consideration in their own right did not occur with the South Pennine Study from which the flawed outcome emerged to place this Scheme in RIS1 - a programme it has already been seen with the A38 Judicial Review and its aftermath was not necessarily reflective of current climate emergency concerns. NPS NN at 4.27 suggests there is a burden on the Examination here.

Also more recently the “Stonehenge judgement” suggests a full appraisal of alternatives to the flawed Scheme to be legally required. On all possible grounds such consideration should be instigated at this Examination to enable a beneficial and sustainable outcome that ends countless years of futile expense and the self-evident damage of the Application. This is a vital window of opportunity for critical change.

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5. Separately on a procedural point.

I continue to maintain (**as with REP9-049**) that any last minute SOCG between NH/TfGM that might reference and raise significant new matters (such as published in an email reproduced by CPRE in **REP09-039**) would be “inadmissible” as they would not be fairly examinable within the Inquisitorial process due to lateness

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6. Abbreviations

<b>Abbreviations</b>	
AQ = Air Quality	LIR= Local Impact Report
“D2” = Deadline 2, D3 = Deadline 3 etc	NH = National Highways
DCC= Derbyshire County Council	PfE = Places for Everyone
DfT = Department for Transport	RIS = Road Investment Strategy
DMRB = Design Manual for Roads and Bridges	SOCG = Statement of Common Ground
ExA = Examining Authority	SoSfT = Secretary of State for Transport
GB = Green Belt	TAs = Transport Authorities
GGGV = Godley Green Garden Village	TfGM = Transport for Greater Manchester
GMCA = Greater Manchester Combined Authority	WCS = Worst Case Scenario
GMSF = Greater Manchester Spatial Framework	
HPBC = High Peak Council	
IPR = Independent Peer Review	
ISH = Issue Specific Hearing	
LHA = Local Highway Authority	