

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

Peter Simon (A57L-001) - **Deadline 12 Submission**

This submission is in 5 sections inclusive of 1 supporting document submitted separately:

1. Comments on the late submission of critical evidence in the form of a SOCG between TfGM and the Applicant.

(TfGM and GMCA are identified as effectively interchangeable in places within this part, as the former is a subsidiary of the latter, as identified in **P26 PD-006**)

References in this representation to a “SOCG” are to **this particular “SOCG” alone**

2. Response to the Applicant’s explanation of numerical disparities within the Scheme Traffic Model (**9.91 Applicant’s response to the D10 Letter to the ExA from IP**)
3. Comments on the Applicant’s various claims for National Policy support for the Scheme (within numerous documents, including **REP11-010 WQ3** and most recently **9.91 Applicant’s response to the D10 Letter to the ExA from IPs**)
4. Abbreviations
5. *“Transitioning to zero emission cars and vans: 2035 delivery plan”* - (see separate submission)

**1. Late submission of critical evidence, namely a (draft) SOCG between TfGM and the Applicant published on 13<sup>th</sup> May for D12**

As an IP I object to this submission in the strongest possible terms and represent on the grounds of the extreme lateness of this lengthy representation that it **must be struck out**. Or **alternatively** that **the Examination is extended to a considerable extent** to allow the full and measured consideration of these matters. So far stringent but reasonable deadlines have applied to the Examination but a last minute mainstream policy submission is not by any reasonable metric within the spirit of the process, or probably its letter.

At the outset of the SOCG the Applicant references a long term “Record of Engagement” that shows “meetings and correspondence” have “taken place between National Highways and Transport for Greater Manchester” from 2016 “in relation to the Application as outlined in Table 2-1”. (Page 7, 2.1.1). **In that case I must ask why is the SOCG supplied to the Examination for D12 about 3 days prior to Exam closure ?**

I note at time of writing that IPs registered for email alerts have received no notification of this submission. It is not within the Exam Library so I would question its status generally. The late tactical

approach can only suggest that the Parties want the material to be included but to avoid measured scrutiny and this is effectively a tacit admission on their part that they feel the case would not stand up to such. To reiterate, this appears incontestably nothing more than an attempt to circumvent the Examination on a number of critical relevant regional policy issues, as for example

- The GMCAZ,
- Junction Design,
- Streets for All,
- Transport Decarbonisation Plan
- PAS2080,
- Active Travel
- Right Mix
- Overall transport emissions in GM *-(half of GM's transport related carbon emissions are associated with the SRN (p28 SOCG)*

( on various pages of the **Draft SOCG** as discussed)

A last minute submission by these significant parties on these mainstream critical policy matters prevents measured response and unchallenged would allow unsubstantiated claims to be made which I consider would falter heavily under even modest examination. This presents total and unacceptable detriment, if not contempt and disrespect, to the Inquisitorial process and Interested Parties.

I do not see how what are unsubstantiated claims could form any part of evidence or reasoning towards a ExA recommendation. This in itself could be a problem for the decision makers because I doubt a plausible recommendation can be made without consideration of these matters. So I reiterate that, as an IP, I would personally support an extension for consideration of what have become new matters through late submission and proxy participation of a party identified as relevant by the ExA as long ago as October. (P26 PD-006) Or alternatively for the entire Examination process to be aborted and for the Applicant to consider their position which might be most appropriate.

I cannot engage directly with this SOCG due to its procedural impropriety and because other IPs may not have been notified of it as there has been no email alert as at the time of writing. (I for example only knew of this document due to being alerted by an associate.) However I have already engaged elsewhere with some of these critical issues raised in response to the Applicants response to WQ3 ( **REP11-010** ) so refer the ExA accordingly. Please see Section 3 of this submission as it does coincidentally deal with several points raised by TfGM in the SOCG in question.

Meanwhile I think I have shown already here that the SOCG is quite obviously a studious if somewhat heavy handed attempt to ensure no scrutiny or examination of critical matters is allowed. I am sorry but there is no other way to put this than here we have a shameful attempt to put on a painfully ill- fitting slipper in a last ditch attempt to go to the Ball! When as I have submitted previously the rightful candidate for the Ball is the optimal "Cinderella Alternative" of Mr Bagshaw and CPRE, as singly or jointly proposed.

## **“Proxy participation in the Examination by a major Statutory Policy stakeholder**

I reasoned at D11 how hard it has been to fathom why there has been no direct participation by TfGM and the GMCA in the Examination as a whole at outset or during proceedings and then quite extraordinarily at the very last minute this form of “proxy participation” appeared. I have also questioned the absence of Sheffield’s equivalent bodies because one of the key purposes of the Scheme is ostensibly inter-city “connectivity” Other bodies and former quangos (TfTN or their current equivalent) cited in the Case for the Scheme are or have been also notable for their absence! **(APP-182 7.3.7)**

Particularly the reluctance of TfGM/GMCA to engage in the process suggests their embarrassment over numerous grounds that do not marry with their ostensible policy aims, such as:

- The Scheme with GGGV and other proposed re-designations represents enormous cumulative GB loss (over 200 hectares with minimal restoration). This is within one GMCA Borough TMBC with major proposed developments all separately claiming “special circumstances” for inappropriate infringement or re-designation; an anomaly of high order in view of the level of NPPF protection for the GB. This I suspect is a “skeleton” that GMCA, the TfGM subsidiary body and Tameside themselves very much want to keep “in the cupboard”!
- Also they have a problem with the GB in question, the Longdendale Corridor, being a critical buffer area to the National Park so they are tacitly acting in complete disregard to their planning burden under the Environment Act of 1995 to have regard to “National Park purposes” ( **s.62 duty under the 1995 Environment Act**)
- It is noteworthy that their original spatial strategy (GMSF circa 2017) placed the Link Roads firmly within a spatial strategy of an Eastern Gateway, and equally notable that by the time of PfE this spatial justification and relationship with the A57 Scheme as it was then, had simply disappeared whereas other Gateways (eg Northern) remain. It can be concluded the Eastern Gateway premise for this was considered unfounded.
- In their answer to the CPRE Letter TfGM identify with NH policy text support for the Scheme within GM Transport Documents of 2025 and 2035. I disagree with this interpretation of the text as cited which is generic and specifies in both places only so as to acknowledge the A57 Link Roads are within proposed national infrastructure programmes. That does not constitute meaningful and evidential endorsement. I am also not aware that these documents published around the start of 2021 directly formed part of the PfE submission that is currently being processed for Examination, a matter I hope to raise in the PfE Examination. (P6 -The Letter) **(P31, 10.24 SOCG)**
- All these matters of uncertainty should have been - and still should be - a matter for careful policy examination but that has been thwarted by this proxy last minute unilateral participation. Presumably because bilateral inquisitorial examination is considered too hazardous for the Scheme and the Authority!

So perhaps it is unsurprising that GMCA/TfGM are so reluctant to openly own any support for the Scheme, to the extent of being invisible during the inquisitorial process and burying their position, supportive or otherwise, in a last minute proxy participation.

This whole approach seems to me at complete variance with the Rule 6 Letter requirement for SOCGs regarding “any other matters on which agreement might aid the smooth running of the Examination and assist the ExA’s recommendation to the Secretary of State”. (P6 SOCG ) Last minute submission clearly obstructs “smooth running”. There has been ample opportunity as the Record of Engagement shows for the SOCG to have been compiled and submitted within a reasonable time frame for the necessary purposes and scrutiny of the ExA . Generally and on this basis the late submission seems an evasion of duty “for their areas of responsibility” (Page 26 PD-06 E1) which is quite unworthy of so weighty a public body as TfGM. I feel they, with the Applicant, warrant censure for this action within the Examination.

In summary for the reasons given of procedural impropriety it seems unequivocally clear that this constitutes poor practice , and the SOCG as a minimum should be declared “inadmissible” and struck out on the grounds of lateness in view of the long identified Examination closure date.

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## 2. The Applicant response to the Letter (CPRE et al) NH Document 9.91

Regarding the Traffic Model there remains a significant disparity between flows in various areas especially between Hollingworth and Tintwistle. The only way that NH can account for is to suggest that the extra traffic is generated by the road in Glossopdale.

*The traffic flows on the A628 Market Street through Hollingworth are higher than the traffic flows on the A628 through Tintwistle because of a combination of the additional traffic demand generated within the urban areas of Glossop, Hollingworth, Tintwistle and Hadfield, the way this traffic demand is loaded onto road network in the traffic model via a single zone loading point and due to much of the traffic demand being to and from the west. (P10. 9.91 at9).*

I suspect that explanation to be possibly correct. In which case how can the lesser though far from insignificant modelled flows through N Glossop and the “village of Hadfield” be plausible. They are almost certainly hugely underestimated and their impacts accordingly and there has been a failure to assess them properly for impacts upon the villages of Hadfield and Padfield (my place of residence).

I therefore maintain that there remains a need for the ExA to commission such closer modelling scrutiny of the areas identified across the local transport network, throughout Glossopdale and beyond really, in order to feel confident to make any kind of safe recommendation. In truth for that necessary work to happen that might well require a further two weeks minimum to be added to any extension already discussed above. Perhaps frankly it would be best and easier to abort the Examination for which strong reason exists as supplied, and the Applicant to consider their position.

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### 3. The Applicant's response to the Deadline 11 Submission 9.91 - their interpretation of National Policy as regards the Scheme.

During the process I have formed the view that when defending their scheme as NSIP with regard to national policy the Applicant have been cherry picking this in their own favour. I accept that there is a national ambition to continue to extend national road infrastructure for longer journeys, but there is also an equal policy to reduce road usage. The Applicant's advocacy and defence of the case simply concentrates on the former, and it is now apparent and conceded by them quite unequivocally that this scheme generates more local road journeys than if it was not built.

*" (a) The traffic flows on the A628 Market Street through Hollingworth are higher than the traffic flows on the A628 through Tintwistle because of a combination of the additional traffic demand generated within the urban areas of Glossop, Hollingworth, Tintwistle and Hadfield, the way this traffic demand is loaded onto road network in the traffic model via a single zone loading point and due to much of the traffic demand being to and from the west" (REP11-010 & as above)*

So looking at matters even on NH terms how can the Scheme possibly be compliant with National Policy, as regards for example the Decarbonisation Plan which certainly does not involve local traffic growth to facilitate infrastructure for longer road journeys? That would be the opposite of "using cars less" .

*The Decarbonisation plan acknowledges that "for most of us, changing how we travel may be a blend, not a binary – it's about using cars less, not giving them up completely" (REP11-010 P16 referring to the TDP p103)*

I have generally noted the Applicant wishes to disparage certain policy raised by CPRE such as the Uncertainty Toolkit as "premature", (P8 9.91) Yet a significant proportion of their future EIA model, and their case as regards AQ generally or for example impacts such as on Ancient Woodland in Glossop, or European Sites, is based on a overwhelmingly premature assumption regarding Electric Vehicles.

I accept the Government wants to go in that direction, and I have read carefully and with interest their relevant "Delivery Plan" which is very puzzlingly absent from the submissions to the Examination. I think I am justified however to examine it here , as this "transition" is the founding "hypothesis" on which the Scheme is built. ("**Transitioning to zero emission cars and vans: 2035 delivery plan**" – as submitted with this document.)

This Delivery Plan is only partly convincing to my mind and so I have to share the doubts reiterated by Derbyshire County Council made in responses to WQ2 (**REP6-026**) and by their representative - a seeming advocate of the Scheme incidentally - that this is a dubious assumption. And yet it is on this assumption of an imminent UK electric fleet (2035/40/50) that the main part of the entire scheme' rationale relies, with the medium term forecasts predicting lesser associated impacts.

*"In relation to the Decarbonisation Plan (the "Plan") as noted in its Foreword, "the plan is not about stopping people doing things. it is about doing the same things differently". It observes that "we will still drive on improved roads but increasingly in zero emission cars". (REP11-010 P16)*

This is a Plan rather than “policy” which I do understand should not be contested at Examination and it reads as an expression of directional intent. It contains a somewhat fragmented if detailed delivery plan of sorts, but it is less than convincing that the monitoring process is a put at the end. With a delivery plan, monitoring is key, yet this element is rather significantly placed out of the way. Without stringent ongoing monitoring of the proposals what is published can only be tantamount to a wish list!

As regards the proposals that form the main content of the Transition document NH hopes that that EVs can mitigate climate change whilst allowing traffic growth in certain situations (such as long distance). Obviously with a projection significantly ahead decision makers need to proceed with caution yet with employing a “best case scenario” projection with minimal evidence NH envisage ongoing “business as usual”, yet with all the carbon issues “magically” solved.

*“The Net Zero Plan is committed to science based targets and sets out National Highways aims to support the transition to net zero travel on the SRN by 2050, and to facilitate embedding ‘net zero’ as business as usual across the organisation and whole supply chain” (P17 of NH document 9.91)*

I concur with the need for such a Transition on AQ grounds to protect our community at least from toxicity and terminal health issues (with the proviso that there should be complete certainty those communities where the materials are sourced benefit appropriately and are not harmed.) I do however hope that the EV aspiration is not simply being applied today as a piece of “sticking plaster” to promote “business as usual” over the burning need for the population to simply drive less. The fact is reluctantly acknowledged by the Applicant at this Examination and within the TfGM SOCG, in the face of strong CPRE representations, that public transport must be truly prioritised as a replacement within Right Mix. Not as window dressing and as an afterthought in the modelling as is the case with this Scheme. Mr Buchan has shown this in various places. **(eg P6 REP4-016)**

I did think that the document was very fragmented just as the projections by the Applicant for 2050 are highly optimistic and confuse projections with fact. It is somewhat significant that there is no consideration of charging infrastructure with this Scheme despite the claims for a future electric fleet. In summary I read the document as a rather rushed hypothesis that arguably simply serves the purpose of waving a magic wand to conjure up an electric fleet by 2035 and allow “business as usual” to continue unhindered by the Climate Emergency. The document does cite the PM’s authority for wanting this transition to occur but at ground level words must be treated with caution and stringent monitoring needs to produce evidence to show delivery can be achieved. I strongly doubt the evidence is sufficient for approval of the Application with such an embryonic proposal.

So I do question how the ExA can be confident about the policy basis here for the A57 Link Roads and am perplexed as to the absence from the Examination of a key though clearly fledgling policy document for the Applicant. I would also extend that comment to suggest that the future electric fleet panacea argument should be treated with similar caution against road infrastructure proposals as for example within RIS1 &2. I similarly feel that TfGM (GMCA) would struggle with such an approach to support the Scheme within their policies. Assuming

that is if they actually allowed the question to be asked of them, which is something they appear very keen to avoid!

<b>Abbreviations</b>	
<p>AQ = Air Quality            "D2" = Deadline 2, D3 = Deadline 3 etc            DCC= Derbyshire County Council            DfT = Department for Transport            DMRB = Design Manual for Roads and Bridges            ExA = Examining Authority            GB = Green Belt            GGGV = Godley Green Garden Village            GMCA = Greater Manchester Combined Authority            GMSF = Greater Manchester Spatial Framework            HPBC = High Peak Council            IP=Interested Party            IPR = Independent Peer Review            ISH = Issue Specific Hearing            LHA = Local Highway Authority</p>	<p>LIR= Local Impact Report            NH = National Highways            NSIP = Nationally Significant Infrastructure            PfE = Places for Everyone            RIS = Road Investment Strategy            SOCG = Statement of Common Ground            SoSfT = Secretary of State for Transport            TAs = Transport Authorities            TDP=Transport Decarbonisation Plan            TfGM = Transport for Greater Manchester            WQ2 = Written Questions 2            WCS = Worst Case Scenario</p>