

TR010034 – A57 Link Roads

DW DEADLINE 12 SUBMISSIONS

DW DL12 Submission 2: two competing views of transport provision

Daniel Wimberley, Date Monday, 13th May, 2022

Unique Reference: 20029775

NOTES AND ABBREVIATIONS

NOTES

Note: I think this one is complete

At this deadline I am treating these submissions as separate documents. The reason for this is to aid transparency. I now see that as the examination library is completely unsearchable, the only way you the ExA, current stakeholders and future readers can find topics easily is to have separate documents with titles which give some idea of the contents. I will include cross references as needed between submissions. With this parcelled layout, there may be some repetition - apologies in advance if this turns out to be the case.

I shall use “Highways England” and “National Highways” as date-appropriate, but usually I will refer to them as HE/NH. It is important to preserve this historical perspective.

ABBREVIATIONS

BCR	Benefit Cost Ratio
CC	Community Consultation
CC2020	Community Consultation for the A57 Link Roads scheme run by H.E. from 5 November to 17 December 2020
CftS	Case for the Scheme <i>zzz</i>
DCC	Derbyshire County Council
EiP	Examination in Public
ExA	Examining Authority
HPBC	High Peak Borough Council
H.E.	Highways England
ISH	Issue Specific Hearing

LIR	Local Impact Report
PINS	Planning Inspectorate
RTPI	Royal Town Planning Institute
TAR	Transport Assessment Report <i>zzz</i>

TWO COMPETING VIEWS OF TRANSPORT PROVISION

Chapter one: the “mainstream-view”

1. The best expression which I have come across of the kind of thinking which underlies the policies which have emerged from the Department for Transport in the last 2 years is an extensive piece of research convened and hosted by the Royal Town Planning Institute (RTPI).

The Royal Town Planning Institute

2. When he was flying solo at the very start of this EiP, as his colleague was ill, Mr Cowperthwaite introduced himself as having a background in urban regeneration, if I remember right. So you, Sir, will be familiar with the RTPI, and for all I know, so is your colleague Mr. Dyer, but for the benefit of other readers a few words of introduction should be given. I believe that it is important to give the credentials of a source which one is going to quote extensively from.
3. The RTPI is the UK’s leading planning body for spatial, sustainable and inclusive planning and is the largest planning institute in Europe with over 25,000 members. It describes itself as being a “leading membership organisation and a Chartered Institute responsible for maintaining professional standards and accrediting world class planning courses nationally and internationally.”ⁱ
4. “Everything we do,” they say, “is inspired by our mission to advance the art and science of town and country planning for the benefit of the public. This means driving planning research, leading policy debates, and identifying best practice.”ⁱⁱ
5. When they describe their focus on climate change, the RTPI expands its mission statement: “Climate action underpins the [RTPI 2020–2030 corporate strategy](#). We are determined to assess our climate impact and take action to address it. This is essential to accomplishing our mission *‘to advance the science and art of planning, working for the long-term common good and wellbeing of current and future generations’* ”. (quote from Corporate Strategy)
6. They list their centres of current interest as follows: Brexit, Climate Change and Energy, Economy, Environment and Rural, Global Sustainable Development, Health and Inclusive Planning, Housing, Public Sector, Strategic Planning, Transport and Infrastructure.ⁱⁱⁱ

The research: “Net Zero Transport: the role of spatial planning and place-based solutions”

7. The research I refer to above is the RTPI report “**Net Zero Transport: the role of spatial planning and place-based solutions**” published on 25 Jan 2021 and available on their website (on the website, search for “net zero transport”).^{iv}
8. It is precisely relevant to **the question which I believe we face at this EiP – what is the best intervention , or rather what are the best interventions – to achieve carbon reduction and a thriving community, and safe and vibrant places?**
9. Yes, this is a wider question than “should we build the A57 Link Roads?” But I urge upon you that this is what common sense, morality and the relevant law and guidance demand. (see submission zzz on this matter)

The Executive Summary:

“

10. The UK needs to rapidly reduce greenhouse gas emissions from surface transport, where very little progress has been made over the last 30 years.
11. “This research explores how different places could achieve an 80% reduction in surface transport emissions by 2030, on a pathway to net zero by 2050. It combines advanced carbon modelling with stakeholder engagement and desk-based research in order to identify and test the impact of approximately 40 carbon reduction interventions in four ‘place typologies’. These are typical of real places in England, and include a unicentric city, a polycentric conurbation, a regeneration town and a growing county.
12. “For each typology, our research demonstrates the need for a comprehensive package of interventions to reduce transport emissions. Our modelling takes a place-based approach which prioritises measures which reduce the overall need to travel, followed by those which shift trips to active, public and shared transport, and finally those which switch vehicles to cleaner fuels. By following this hierarchy, decarbonisation acts as a catalyst for reducing car dependency and creating healthier, safer and more equitable communities. By contrast, the switch to cleaner fuels only accounts for just over half of the necessary emission reductions, reinforcing the need for a ‘do everything’ approach.
13. “In our modelling, a ‘do nothing’ scenario sees transport emissions increase. To avoid this, all new development should be located and designed to generate zero emissions from surface transport, and should enable carbon reduction in other places to achieve ‘carbon negative growth’.
14. “The planning system should also prioritise urban renewal that enables growth while achieving a substantial reduction in travel demand. This should focus on maximising the potential for local living by ensuring that most people can access a wide range of services, facilities and public spaces by walking and cycling. Increased home working, digital service delivery, and new forms of flexible work and community spaces will play a key role, alongside investment in place.

15. “Residual travel demand should be shifted away from private vehicles to active, public and shared forms of transport, at a scale which significantly exceeds current UK best practice. Integrated transport networks should be accompanied by access and parking restrictions for private vehicles, creating liveable streets and ensuring that sustainable modes are always the most convenient and affordable choice.
16. “Achieving this requires a decisive break with the conventional approach of meeting predicted changes in travel demand with new road capacity. The planning system must also look beyond the promotion, allocation and servicing of land for new development. The scale of this challenge requires a truly integrated approach that unites transport and land use planning to deliver place-based visions which meet ambitious targets for trip reduction, modal shift and carbon reduction, alongside other economic, social and environmental objectives.
17. “To help envisage this transformation, our research created a spatial vision for each of the place typologies in 2030 which maps out key carbon reduction interventions. This shows what an ambitious emission reduction pathway might look like for different types of place, and the wider benefits that can be unlocked.
18. “Achieving these place-based visions requires a policy framework that puts the reduction of carbon at the heart of decision making, and enables the planning, funding and delivery of the necessary interventions to create genuinely sustainable communities. This report is accompanied by a discussion paper which sets out potential barriers to achieving these objectives, and suggests recommendations
 ”
 for change.

Key points from the Summary

19.
 - a) bringing real urgency into tackling emissions from surface transport
 - b) finding solutions with regard to transport which work across differing types of places
 - c) finding solutions with regard to transport which deliver very large emissions reductions (80% by 2030)
 - d) achieving decarbonisation acts as a catalyst for reducing car dependency and creating healthier, safer and more equitable communities
 - e) stating a clear hierarchy of interventions with location planning first, followed by stimulating modal shift, and ending with technological fixes (EV’s)
 - f) maximising the potential for local living: having facilities close at hand
 - g) identifying clear positive measures to ensure modal shift on the scale required
 - h) blending trip reduction, modal shift and carbon reduction with other economic, social and environmental objectives in a “place-based vision” – and

- i) the policy implications, including the planning, funding and delivery of the interventions required and breaking with the “predict-and-provide” model for transport provision.

About the Study

20. The research was carried out by LDA Design, with City Science and Vectos, though one of the report authors was from the RTPI. The project was part-sponsored by the RTPI North East region, and supported by the [Transport Planning Society](#) (TPS) and [Chartered Institution of Highways and Transportation](#) (CIHT), who each provided an expert member to the expert steering group giving oversight.
21. More importantly, it is worth noting that the third member of the steering group was Richard Walker, Transport Planning & Strategy Adviser at the Department for Transport. ^v It is possible that prolonged exposure to, and involvement with these ideas has been a part of the flux which has led to the wholesale changes in transport policy at the DfT in the last 2 years.

Chapter two: the “HE/NH - view”

Aims and objectives of the scheme

22. To get at the “HE/NH - view” I start by looking at the stated aims of the scheme. Here is one version:

“The scheme

23. We’ve developed a project to improve journeys between Manchester and Sheffield, as this route currently suffers from heavy congestion which creates unreliable journeys. This restricts potential economic growth, as the delivery of goods to businesses is often delayed and the route is not ideal for commuters, which limits employment opportunities. Much of this heavy traffic travels along local roads, which disrupts the lives of communities, and makes it difficult and potentially unsafe for pedestrians to cross the roads. These issues will only get worse with time if significant improvements aren’t made.”

SOCC, page 3

24. And here is another:

25. **“ 3 Benefits and Objectives of the A57 Link Roads Scheme:**

Strategic Objectives

- **Connectivity:** By reducing congestion and improving the reliability of people's journeys through Mottram in Longdendale and between the Manchester and Sheffield city regions

- Environmental: By improving air quality and reducing noise levels in certain areas, through reduced congestion and removal of traffic from residential areas. The Scheme is also being designed to avoid unacceptable impacts on the natural environment and landscape in the Peak District National Park
- Societal: By reconnecting local communities along the Trans-Pennine route.
- Capacity: By reducing delays and queues that occur during busy periods and improving the performance of junctions on the route.

Local Benefits

- Removing through traffic from a number of the existing main roads in Mottram in Longdendale, which will reduce noise levels and pollution to properties (including residential) for people living nearby.
- Creating better conditions for pedestrians and cyclists in Mottram in Longdendale.
- Reducing congestion and delays affecting residents and businesses in the area.”

Equality Impact Assessment. TR010034/APP/5.6 Pages 5 and 6,

Summary of the key points of these descriptions of the scheme:

26. The view which emerges from these two statements of the aims and objectives of the scheme can be summarised as follows:
- a) It is important to promote economic growth
 - b) It is important for businesses and organisations to have a wider pool of potential employees
 - c) It is important for would be employees to have a wider choice of employer
 - d) Shorter journey times and more reliable journeys are an aid to all the above
 - e) Traffic is set to grow and issues arising from traffic will get worse if nothing is done
 - f) Environmental harms both to the environment in general, especially sensitive areas like the National Park, and to local residents and businesses should be minimised
 - g) Opportunities for active travel are important and should be promoted
 - h) Reconnecting local communities is important
 - i) It is important for people to be able to cross the road easily and safely
 - j) Reducing congestion is good both because it reduces emissions and traffic nuisance but also because it has an impact on journey times and on reliability

The approach of the applicant

27. This reveals as much about the view of the applicant as do his statements of what the aims and objectives of the scheme are. Two aspects of the applicant’s approach to preparing the scheme deserve mention. The first is his approach to consultation with the public and with local authorities. The second is the extraordinary gaps in the scope of the traffic modelling.

28. On the first matter, it is a matter of record that at the Community Consultation in November 2020 the public were not given adequate information to give an informed view of the scheme. At the time of the public consultation they had *no idea* of the predicted traffic flows on the distributor roads throughout Glossop, nor of the newly magnified congestion issues at the Shaw Lane junction and beyond. The same goes for Derbyshire County Council, High Peak Borough Council, and the Peak District National Park Authority, all of whom lodged holding objections to the scheme at consultation stage because they had not been given adequate information and all of whom had as a result limited time to prepare their LIR's even though these are required by statute.
29. I think it is significant, when we are trying to understand the way the applicant sees things, that the same authorities took the same action in 2018, a fact which they pointed out this time around in their objection letters to Highways England.
30. The second aspect which I wish to draw to your attention is the failure of the traffic modelling work to take account of public transport use or of the effect on modal shift of the raft of recent DfT policy announcements.
31. Here is an extract from the Applicant's responses to Examining Authority's Second Written Questions (library ref: REP6-017):

32. ExA question 3.3:

33. "There are aspirations, both at local and national level, to transfer journeys to more sustainable transport modes.
- a) Is this reflected within the model?
- b) If so, what assumptions and allowances have been made to reflect this? If not, should it be?"

HE/NH reply:

34. "The traffic modelling used for the assessment of the Scheme is based on the Department of Transport's (DfT) National Trip End Model (NTEM) that forecasts change in the number of trips between origins and destinations by areas or zones. The NTEM changes in forecast trips are derived from a wide range of demographic and economic forecasts, such as forecast changes in population, economic growth, car ownership levels, etc. that determine the demand for travel, the mode of transport likely to be used for trips and the timing of those trips. This is currently the DfT's established method of forecasting future traffic demand. **The latest version of NETM (*sic*) does not include a specific generalised allowance for transfer of journeys to more sustainable transport modes. This is because it is a national and local Government policy aspiration that is not currently backed up by firm strategies or comprehensive and coordinated schemes.**
35. "In addition, bus patronage across most of the UK is in decline and bus services are being **withdrawn due to both this and funding cuts.** However, the modelling used for the assessment of the Scheme does take account of the anticipated schemes in the 2016 Network Rail Route Specifications, which are: . . . [there follows a long list of rail schemes in and around Manchester]." (*my emphasis*)

Chapter three: the views compared

36. The summary of the RTPI and others' research set out above boils down to a set of principles and methods which are consistent with one another and which would lead to the creation of "genuinely sustainable communities," which in a time of Climate Emergency is an essential goal. These communities would also consist of people who would be healthier because of the active travel component and there being less nuisance of all kinds from traffic, with a more equal access to the transport they need, and a better urban environment, and at the same time, access to work opportunities and community facilities would not be compromised.
37. By contrast the absence from the modelling of two years of new policies on transport which come from the same department as the department which licences HE/NH to do its work in the first place reveals a startling lack of coherence within the department. There is a deep structural problem when policies which have targets for modal shift and funding streams within them are ignored when it comes to updating the guidance which underlies the modelling work which is being done for schemes like this up and down the country under the same department.
38. How big this structural problem is and the implications for this EiP will be made clearer in my submission 3 on government policy in this DL12 set of submissions.
39. It is worth considering the aims and objectives one by one, as the "view" of the scheme's proponents must be encapsulated by them. This will be a critical look, as they do indeed invite criticism.
- 40. It is important to promote economic growth**
41. Sustainability is written into the Planning Act 2008. Economic growth without sustainability built in is a pathway to ruin as we are now aware. So the economic growth which HE/NH assume to be desirable comes with a big caveat - it has to be sustainable. It is not clear to me that HE/NH is in any way aware of the implications of this for freight movements in general or for freight movements on this particular corridor. For more on this question of economic growth, see submission [zzz](#) (sadly not available at this deadline due to time constraints).
- 42. It is important for businesses and organisations to have a wider pool of potential employees**
It is important for would be employees to have a wider choice of employer
Shorter journey times and more reliable journeys are an aid to all the above
43. It is true that a larger job market should lead to greater efficiency. People will be more able how to find jobs for which they are suited and businesses will be more able to find the right people. It is also true that shorter journey times and more reliable journeys would help. However this raises immediately the question of how these better journey times and better journey reliability can be achieved.
44. Commuting is a trip type which lends itself to being better provided for by rail. Rail is more carbon friendly and will become even more so if electrification comes to the Hope Valley line, which I

believe [zzz ref](#) is under consideration. Rail has another massive advantage over road in this particular corridor and that is that it is more reliable. For current plans see here. ^{vi}

45. Not only is rail superior to road for this trip type there is also the question of whether it makes sense, in a time of climate emergency, to encourage or “predict and provide” for increased long-distance commuting. So although on paper it may seem alluring and persuasive to talk about job opportunities and ease of long-distance commuting, in fact it is a nonsense, certainly a nonsense if done by road, and particularly so in our specific geographic context.

Traffic is set to grow and issues arising from traffic will get worse if nothing is done

46. I think this assertion lies at the heart of the HE/NH view of transport provision. It is in effect the old “predict and provide” approach to transport planning. Three things need to be said.
47. The first is that endless growth in traffic is not compatible with our targets for carbon reduction, in particular with our short and medium term targets. ^{vii} The charts at REP5-039 show that HE/NH are assuming a roughly 10% background growth in traffic between 2025 and 2040.
48. The second is that endless growth in traffic will lead to an endless growth in traffic nuisances, the familiar list of increased noise, pollution, anxiety and stress, severance and the takeover of space by motor vehicles. HE/NH say that issues arising from traffic will get worse if “significant improvements are not made.” This causes me a wry, but despairing, smile because we are learning at this EiP that it is equally true to say that issues arising from traffic will get worse if the so-called “significant improvements” *are* made.
49. The problems can only be solved if the root cause is tackled and that is the traffic itself.
50. Which brings me to the third point which needs to be made. In “HE/NH-view” traffic grows of its own volition. It is like a force of nature: it just increases and we have to go through this struggle of dealing with it somehow or other. The truth is that we will be endlessly chasing our tails, moving on to the next traffic jam, the next congestion hotspot, unless we tackle the problem at source, as the mainstream view now does. (see submission 3, on government policy)
51. **The Shaw Lane Junction has occupied this EiP for hours. It is a classic case of the problems which arise from pursuing solutions within the HE/NH view – there is no end to it. The problems are intrinsic to the view, and cannot be solved. They can only be boded. I hope that you will not recommend such a sorry state of affairs and one which actually harms the residents of Glossop.**
52. I look at the conundrum of the Shaw Lane junction in submission [zzz](#) (sadly not available at this deadline due to time constraints).
53. I look at the way that government policy has now adopted the mainstream view and is therefore moving to a conceptual framework where such problems can be permanently resolved in submission [zzz](#).

Environmental harms both to the environment in general, especially sensitive areas like the National Park, and to local residents and businesses should be minimised

54. This is an honourable aim which no one would argue with. Unfortunately, we have no idea at this EiP whether the scheme fulfils this laudable aim as the Applicant has so far not told us how many residents will have more traffic outside their front doors, how many will have less and how many will have the same, as now. However on the face of it, knowing what we now know about traffic flows through Glossop, we know what the likely answer will be (which is why they do not tell us).
55. It is worth noting how carefully *geographically* limited are most of the claims set out in the quotation from the *Equality Impact Assessment*. A close look is very revealing. (*see para. 25 above*)

Opportunities for active travel are important and should be promoted

56. The Applicant talks the talk on this one, but a closer look reveals an overall large negative impact. I look at this in Submission zzz. (sadly not available at this deadline due to time constraints)

reconnecting local Communities is important

57. The phrase “reconnecting local Communities” is often used by the Applicant. It is not at all clear what it means. And because the meaning is unclear the statement cannot be tested. It may be a reference to “severance” in which case why not say so, whereupon one could look at the traffic flows with and without the scheme to see if this effect did indeed exist. However maybe the purpose of this phrase is to be found in the fact that it uses three “good” words in succession: “reconnect”, “local” and “communities.” You will find more on matters such as these in the submission on the behaviour of the Applicant (Submission zzz (sadly not available at this deadline due to time constraints)).

it is important for people to be able to cross the road easily and safely

58. see above, paragraphs 49-56 on “Traffic is set to grow”

reducing congestion is good both because it reduces emissions and traffic nuisance but also because it has an impact on journey times and on reliability

59. Thinking from West to East, for traffic heading for the A628, the scheme reduces congestion a lot along a stretch of road between the M67 junction and the new Junction at Mottram Moor which is roughly 1 mile long. This stretch includes one cross roads in the centre of Mottram. There is some further reduction in congestion between the Mottram Moor Junction and the Gun Inn Junction due to the fact that the A57 traffic has left the old route to go down the new spur road towards Glossop.
60. For traffic heading for the A57 – Glossop, points south, and Snake Pass, the scheme reduces congestion along the same 1 mile stretch of road between the M67 Junction and the new Junction at Mottram Moor as well as the congestion at the Gun Inn Junction.
61. This is all good as far as it goes but the claimed benefits are highly questionable. The scheme attracts extra traffic to the area to the tune of 7500 additional movements along the last section of the M67 and all of this traffic must go to, or come from, somewhere. As we now know, much of this traffic

ends up in Glossop creating new congestion or additional congestion throughout the Glossop area. For more detail on this see the submission on the Shaw Lane junction conundrum (submission zzz).

62. The changes to journey times have only been reported to the EiP by the Applicant in the TAR for a limited range of journeys all of which use the Spur and the Bypass, and all of which show a positive change. The true picture for local journeys is quite different. ^{viii} The applicant has given no appraisal of the impact on journey times between Manchester and Sheffield; however the monetary benefit of time saved on such journeys has been calculated to be quite small, most of the journey time benefits accrue to people making local journeys. *Zzzz ref to 790 pp, or to HE/NH answers*
63. The benefits to reliability are even more questionable. 5 ½ out of the 7 factors affecting the poor reliability of this corridor when it comes to travel by road, as stated in the Feasibility Study of 2015, ^{ix} and repeated in the ES Chapter 3 paragraph 3.3.7 and Case for the Scheme paragraph 3.1.2 are *not affected* by an intervention in Glossop Dale which bypasses two junctions.

Concluding remark

It is quite a stretch to say that the scheme achieves £228million worth of benefit!

The package which would follow from the mainstream view as stated here, would achieve more benefit for everyone.

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^v All information from the website page of the report.

Corridor	Preferred network options	Best current stopping service		Best potential stopping service with Northern Powerhouse Rail	
		Frequency	Minutes	Frequency	Minutes
Leeds - Newcastle	Infrastructure upgrades and use of HS2 (Stops - York, Darlington, Durham)	3	81-91	4	72.5
Leeds - Hull	Infrastructure upgrades (Stops - Selby, Brough)	1	56-63	2	46
Sheffield - Leeds	Infrastructure upgrades and use of HS2 (Stops - Rotherham Main Line/Barnsley Dearne Valley)	1	39-42	4	23.5
Sheffield - Hull	Infrastructure upgrades (Stops - Rotherham Main Line/Meadowhall, Doncaster, Selby/Goole, Brough)	1	76-84	2	67
Manchester - Sheffield	Infrastructure upgrades (Stops - Stockport/Hope/Dore)	2	49-57	4	34.5
Manchester - Leeds	New line serving central Bradford (Stops - Bradford)	4	48-61	6	30
Liverpool - Manchester	New line via central Warrington (Stops - Warrington, Manchester Airport)	4	35-51	6	29.5

Note the vast improvement in journey time, which iirc NH did not refer to in a recent answer about the potential for rail, or downplayed zzz. Source: "Northern Powerhouse Rail - Connecting the people, communities and businesses of the North: Transport for the North's advice to government on the Northern Powerhouse Rail network" June 2021

AND

"These two cities are close to each other, but poor road and rail links over the Pennines limit their interaction, meaning people struggle to access the job markets and international gateways (including Manchester Airport) required to drive growth and level up the economy. **To protect and preserve the environment through the Peak District National Park, we are focusing on upgrades and journey time improvements to the Hope Valley route between Manchester and Sheffield.**" *Ibid (my emphasis)*

^{vii} Also, with lorries, trains and planes decarbonising later, cars will need to overcompensate for emissions cuts in the short term, according to Professor Anable (cv as long as your arm, sorry no time to find zzz, one of her roles is advisor to DfT) She tells Carbon Brief:

“You simply cannot achieve any emissions reductions from the transport sector by 2030 if traffic growth is allowed to continue, and [you] need significant absolute reductions from today’s levels in order to make any real cuts in carbon.” *Source: Carbonbrief – credentials are listed in my DL8 submission REP8-036 para. 86 and footnote 17*

viii **“Journey Times**

7.27 Journey times are forecast to improve between the M67 and Glossop crossroads – a route analysed within the TAR. This route is able to use the entirety of the scheme.

7.28 Journey times are also forecast to improve between Roe Cross and Glossop in some time periods. This route is able to use a single section of the scheme (A57(T) to A57 link road) and as such journey time improvements are not as significant.

7.29 The impact with and without the scheme on journey times for key routes is shown in Figure 7-2 and Figure 7-3.

7.30 This data is summarised in Table 7-1 and shows that whilst those making longer trips through Glossop that also make use of the new infrastructure will experience journey times benefits, those shorter local trips fully contained within Glossop will see journey time dis-benefits” (*HPBC/DCC LIR*)

ix “Journey-times are increased by delays at junctions and the geometry and topography of routes;

- Long term traffic growth will bring some urban sections of routes to their capacity.
- Accidents reduce journey time reliability, with high accident rates on some routes and a number of accident clusters;
- Severe weather causes road closures which reduce journey time reliability;
- Maintenance on single carriageway sections reduces journey-time reliability;
- Asset condition, including the standard, age and damage to infrastructure, reduce journey-time reliability through significant maintenance operations and risk from closures; and,
- There is a lack of technology to assist in the operation and management of the routes and provide information for travellers”

TRANS-PENNINE ROUTES FEASIBILITY STUDY STAGE 1 REPORT, FEBRUARY 2015, para. 1.3.1