

<b>Family Name</b>	Aylmer-Shanks
<b>Given Name</b>	Caroline
<b>Person ID</b>	1287559
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Aylmer-Shanks
<b>Given Name</b>	Caroline
<b>Person ID</b>	1287559
<b>Title</b>	JPA 22: Land North of Smithy Bridge
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	NA
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>I do not consider that the JPA 22 site meets the criteria for being "positively prepared". The traffic modelling used to assess the impact of this site on the highway network is based on the GMVDM which relies on a SATURN model (which is a strategic transport model). The traffic flows within this model are not appropriate for local junction assessments without demonstrating that there is a high level of validation and calibration achieved within the area. The information provided does not include the evidence to assess this at a local level. This should be requested to demonstrate that the evidence base is sound.</p> <p>- Figure 2 of the Locality Assessment includes secondary access points from the adjacent residential streets within Smithy Bridge, but elsewhere it is suggested that these would only be emergency access points. Clarification on this should be provided on this.</p> <p>Section 15.2 (List of Final Interventions) of the Locality Assessment refers to an "A58 Residential Relief Road" as a supporting strategic intervention but it is unclear whether this has been included within the traffic modelling. This intervention would have a significant impact on traffic distribution within the area and would in particular impact the operation of the Wildhouse Lane / Smithy Bridge Road junction and the Halifax Road / Smithy Bridge Road junction. This should be clarified in order to assess the evidence base properly. The same section of the Locality Assessment also includes for a "300 space visitor car park to replace existing car park lost to development" within the list of "Necessary Local Mitigations" but no reference is made as to where this could be provided and the impact that this would have on traffic flows.</p> <p>Section 15.2.1 of the Locality Assessment (Necessary Local Mitigations) also includes an acceptance that "It may be difficult to locate the signal heads for the signalisation of the A58 / B6225 Hollingworth Road junction due to the railway bridge". I question whether this meets the definition of being</p>

	<p>positively prepared as it does not make provision for the infrastructure that it determines are needed.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<ul style="list-style-type: none"> <li>- Details of the GMVDM performance in the local area to ensure that the base model is fit for purpose;</li> <li>- Clarification as to what has been included within the traffic modelling undertaken (eg confirmation as to whether the A58 Residential Relief Road and car park relocations have been included;</li> <li>- Clarification on the vehicular accesses to the site - is there to be one main access from Hollingworth Road with emergency / non-motorised user access points elsewhere?</li> <li>- Confirmation as to whether the proposed 'necessary' mitigation measures are achievable.</li> </ul>