TR010034 – A57 Link Roads

DEADLINE 4 SUBMISSION

But now made in time for DEADLINE 5

v2 with material added Friday, 25 February 2022

Daniel Wimberley, Date Friday, 25 February 2022

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INFORMATION FAILINGS OF HIGHWAYS ENGLAND WITH REGARD TO THE A57 LINK ROADS

HIGHWAYS ENGLAND'S TRAFFIC MODEL THEIR TRANSPORT ASSESSMENT REPORT, OTHER INFORMATION FAI.INGS AND SUGGESTED ACTIONS FOR THE EXA TO TAKE

*NOTE: I have marked requests to the ExA with the phrase "(**Request to ExA)"***

CONTENTS

INTRODUCTION

SUMMARY

The theme of this submission is the failings of HE with regard to information. There are three failings which demand action from the ExA.

The first is the traffic model, which I will show is fatally flawed. The second is the Transport Assessment Report, which as I will show fails to provide necessary information to stakeholders in the process in many key areas. And the third is the lack of information made available to the public at consultation stage which we are now more aware of than at the start of this EiP.

Each failing on its own is significant enough to make it wise for the ExA to pause the inquiry whilst it is remedied. Taken together – well, the conclusion is obvious, even if it may appear drastic. These are serious, very serious failings, and they must all be addressed.

THE TRAFFIC MODEL

The traffic model itself, the key to understanding the whole project and its different impacts, throws up so many issues, as you will see from the bar charts and other information which I will present as part of this submission, that you the ExA will, I believe, have to take action on this front alone to ensure that the examination can produce any credible and firmly founded conclusions.

THE TRANSPORT ASSESSMENT REPORT

The stakeholder coming to this report would expect accurate information on transport provision as it is now in the area of the scheme, and how it might evolve, and the impacts of transport on people and environment in the area, and how these could be enhanced if good, and reduced if bad. But I does not feel at all like this. It is a promotional brochure for the scheme.

THE LACK OF INFORMATION AT CONSULTATION STAGE

We are now, particularly after ISH2 in February, more aware than ever of how the public has been kept in the dark over key impacts of this scheme. This is profoundly damaging at many levels, but considering it narrowly from the EiP's point of view, the consultation in November/December 2020 can now clearly be seen to be invalid.

ACTIONS BY THE EXA

I ask that you, the ExA do the following (**Request to ExA):**

- Instigate a peer review of the Traffic Model, in particular the changes made following the switch of consultants in 2018/2019 to resolve the numerous issues with it
- Ask the applicant to provide a satisfactory TAR, including proper assessments in all areas of potential impacts and proper assessment of alternative transport solutions
- Rule that the 2020 community consultation report be considered out-of-play, together with any remedial action to be taken, e.g. a request to the applicant to re-run the consultation with full information provided to the public.

THE CHAPTERS

At the heart of Chapter 1 are the bar charts which show the model's predictions along the 2 routes from the M67 roundabout, one along the A628 through Hollingsworth and Tintwistle and out along the valley towards Crowden and the other along the A57 or the new link roads to Brookfield Road and on through Glossop and out towards Snake Pass. These raise many questions about the model, which boil down to: is it credible? and why was the information it has yielded, on the working assumption that its findings are valid, handled in the way that it was?

Chapter 2 deals with any anomalies with the outputs from the model which do not show up in the bar charts, and the inconsistencies in what HE says about their own traffic analysis and predictions. I see this as evidence which supports my claim: that there is something seriously wrong in the whole area of the traffic model which must be addressed by the ExA.

Chapter 3 is a close look at the Transport Assessment Report (TAR), focussing especially on its approach to the traffic model, issues of journey times and reliability of journeys, accidents, severance, other impacts of traffic on known areas of sensitivity such as Hollingsworth, Tintwistle and Glossop, impacts on climate change, public transport in the form of bus and rail services, rail freight. Is the Transport Assessment Report in any sense an *assessment*, or is it more of a brief canter around some aspects of the scheme, painting it in the best possible light?

Chapter 5 sums up all the information which has been missing or delayed-in-arrival during this A57 process, and spells out the consequences of this lack of information both on the public at large and on the EiP itself.

And finally the Conclusion. The public need assurance that the SoS will be in a position to take the right decision in the public interest armed with enough sufficiently accurate evidence. This evidence has to go to the SoS from the ExA, but the very integrity of this Examination is under threat due to information failures. And so the question arises, what are you going to do about it?

Chapter 1: The mysteriousness of the outputs of the model and their significance

Brief note: I use AADT figures throughout. This is because HE use them most of the time and therefore for consistency with that, But actually AAWT are more revealing of what people actually experience the majority of the time.

INTRODUCTION

This chapter is built around a series of bar charts which enable the reader to compare flows measured or estimated in the past, which I call the baseline flows, and traffic flows predicted in the future by the model.

The charts are in the form of a Power-point presentation. The opening slides are notes designed to help the reader to read the charts easily, and notes on the significance of the charts. These notes are also copied into this submission in case it is easier to read them that way.

Under each chart there are also notes specific to that chart. Most of this information is at the level of detail and highlights what I think that chart is telling us. However by virtue of the information being presented visually, the charts may turn out to be helpful in other ways.

Below is an overview of the key points which are evidenced by the charts.

OVERVIEW - KEY MESSAGES FROM THE CHARTS

1. **HE switched their traffic modelling consultants in mid-preparation of the scheme consultation and application,** replacing ARCADIS with Balfour Beatty and Atkins (BBA), who then revised the model. The switch began in 2018 and finished in 2019. According to the bundle of documents released by CPRE

" Initial air quality (AQ) modelling undertaken by Arcadis in July 2018 indicated that an unmitigated TPU scheme could have significant AQ effects [in Tintwistle, Dinting Vale and Glossop High Street] and jeopardise the application for development consent" (document library REP2-090: page 519 Para. 7.3.1)

(my emphasis)

I mention this first because I believe it provides a lens through which to view what follows. It may serve to explain some of the difficulties, inconsistencies and frankly implausible predictions which you will see resulting from the model in this chapter and the next.

2. **The HE-modelled 2025-DM figure for the M67 J3 / J4 is almost certainly incorrect**.

   We know this because as the charts clearly show, ***(slide 14)*** this figure is almost exactly the same as the 2015 HE ATC-based model baseline figure, and yet far less that the 2019 DfT ATC figure. This is so implausible that it is almost certainly untrue.

3. **All the other 2025-DM figures are therefore almost certainly incorrect also,** since they have to be consistent with the M67 2025-DM figure, as this is the main route into and out of the area.

4. **Comparisons between 2025-DS and 2025-DM are then in turn also invalidated**, because what is effectively the baseline, namely 2025-DM, is suspect. And if the baseline is suspect then **the model itself is suspect.**

5. These comparisons are used to justify the automatic scoping out or screening out of all kinds of assessments on the grounds that the 'criteria have not been met,' such as the criterion that the 'no. of vehicles AADT must be greater by >1000.' So **all these automatic scoping out or screening out decisions are also no longer valid.**

6. It follows that **all impact assessments**, insofar as they correspond to traffic volumes and composition **are invalidated**. FTAOD this includes but is not limited to noise, vibration, visual intrusion, accidents, air quality of all types, severance, chilling effect on active travel modes, biodiversity . . .

   The charts show up problems which point to the fact that the way the model works and what it is suggesting will happen are questionable.

7. **Anomaly 1:** on the A628 route there is a very large drop in predicted flows between Market Street in Hollingworth and Tintwistle, which is hard to explain as they are adjacent settlements. ***(slides 14&15; 18&19)***

8. **Anomaly 2:** on the A57 route between Glossop High Street East and Snake Pass there is a huge drop in predicted flows, which is even harder to explain. ***(slides 24&25)***

9. On the A57 route a remarkable **switch in predicted traffic flows** on **Glossop High Street - West and East -** can be clearly seen on the charts. Knowing what we know now, this is the effect of the various "alternative routes" round the back streets of Glossop. ***(slides 24&25; 28&29)***

10. The question of **AQMA's being excluded from assessment** because the increase in flows from DM to DS is "not big enough" made more transparent by slide 9, where they are shown on the map. The relevance of all these key messages is then quite clear. ***(slide 9)***

POWER-POINT PRESENTATION

I now invite the reader to open the PowerPoint presentation which is attached. *(document name:* "PRESENTATION traffic flows v7 AS SENT")

The presentation includes explanatory notes which I reproduce here for ease of reference. *(see next page)*

POWERPOINT PRESENTATION - COPY OF POWER-POINT INTRODUCTORY NOTES FOLLOWS:

_____ Start of Power-point notes _____

A57 LINK ROADS SCHEME
COMPARISONS OF TRAFFIC FLOWS, ACTUAL AND PREDICTED

NOTES ON THE CHARTS

1. There are two sets of charts
2. The first set shows traffic flows at locations between the M67 and Crowden along the A628.
3. The second set shows traffic flows at locations between the M67 and Snake Pass along the A57
4. Each slide shows the locations along a route and the bars show traffic flows at each location.
5. The bars show AADT (Annual Average Daily Traffic) traffic flows which arise (briefly put) from actual counts or from models based on actual counts or from estimates based on counts or from modelling
6. If you hover the mouse over the end of a bar you will see the number at that data point
7. The traffic flows are from 2015, 2019, 2025-DM, 2025-DS, 2040-DM and 2040-DS, where DM=Do-Minimum and DS= Do-Something
8. On each chart there are 1, 2, 3, 4, or 6 bars for each location. They are always displayed in the order shown above.
9. **At five key locations: Tintwistle, Crowden, Glossop High Street, E&W, and Snake we have no 2015 figures.** On some charts with just 2 bars per location, these 5 locations have only one bar, so it is very obvious that 2015 is missing**. But be aware that on most charts it is <u>not</u> so obvious that they have one bar missing and so you can get tripped up when reading the chart.**
10. **2015:** These flows are always shown in dark blue. These are from Highways England (HE) baseline model, which is based on actual traffic counts.
11. **2019**: These flows are always shown as red and are from the Department for Transport (DfT). With one exception these sites have manual counts carried out every so often. The dates of the most recent manual counts at each site are shown in the green text box on each chart. These counts are updated in subsequent years by calculation and extrapolation.

a) The exception is the M67 J3/4 figure, which is not estimated on the basis of manual counts. It is an ATC (Automatic Traffic Count).

b) These 2019 figures are from the DFT website: https://roadtraffic.dft.gov.uk/#6/55.254/-6.053/basemap-regions-countpoints

c) **It is important to note that all the 2015 figures and the 2019 figure for the M67, which is a critical element of the model, as it feeds the most traffic into and out of the area, are derived from ATC's and so are the most accurate figures on the charts.** (see notes 10 and 11a above)

12. **In the chart headings I call 2015 and 2019 baselines – as that is what they are.**

13. **2025-DM:** These are modelled predictions for the opening year of the scheme in a Do-Minimum scenario

14. **2025-DS:** These are modelled predictions for the opening year of the scheme in the scenario that the scheme were to be constructed

15. **2040-DM:** These are modelled predictions for the design year of the scheme in a Do-Minimum scenario

16. **2040-DS:** These are modelled predictions for the design year of the scheme in the scenario that the scheme were to be constructed

NOTES ON THE SIGNIFICANCE OF THE CHARTS

1 **IMPORTANT NOTE: The 2015 bars, and the M67 2019 figure are all derived from ATC's and are therefore the most accurate figures on the charts. So it is legitimate to say that the 2025 and 2040 figures, which are predictions, have to be weighed against what the 2 baselines (2015 and 2019) are telling us.**

2. Bearing that in mind, the fact that the 2025 DM figure for the M67 is massively less than the 2019 DfT figures, and in fact is virtually the same as the 2015 baseline is quite extraordinary. Ditto for Stockport Road.

3. As a thought experiment, let us adopt a hypothesis that HE have a great desire NOT to assess AQ issues in the AQMA's of Tintwistle, Dinting Vale and Glossop.

4. For example, in Tintwistle, what matters is the difference between the DS figure and the DM figure **as <u>a number and not as a percentage</u>.** And the other thing that matters is that **<u>that number is less than 1000</u>**.

5. If you apply, say a 10% increase, to a flow of 10,000 you get a numerical increase of 1000. The modelled figure is actually 9699. Et voila – the increase is now 969. *Sorry folks, but the AQMA will not be assessed.*

6. And if you apply, say a 10% increase, to a flow of 11676 (the DfT 2019 estimate for Tintwistle), which is presumably connected to the (accurate) ATC count back on the M67, then you get a numerical increase of 1167. *Oh dear, the AQMA will have to be assessed*.

7. I am NOT saying that DS is derived from DM in this way. But DM and DS figures are connected because the model which gives rise to them stays the same. What matters is the size of the gap, and whether it shrinks when the 2025 DM flow is dramatically altered downwards.

8. The other thing which matters is whether or not we can have faith in the model itself!

FINAL NOTE ON THE "HYPOTHESIS"

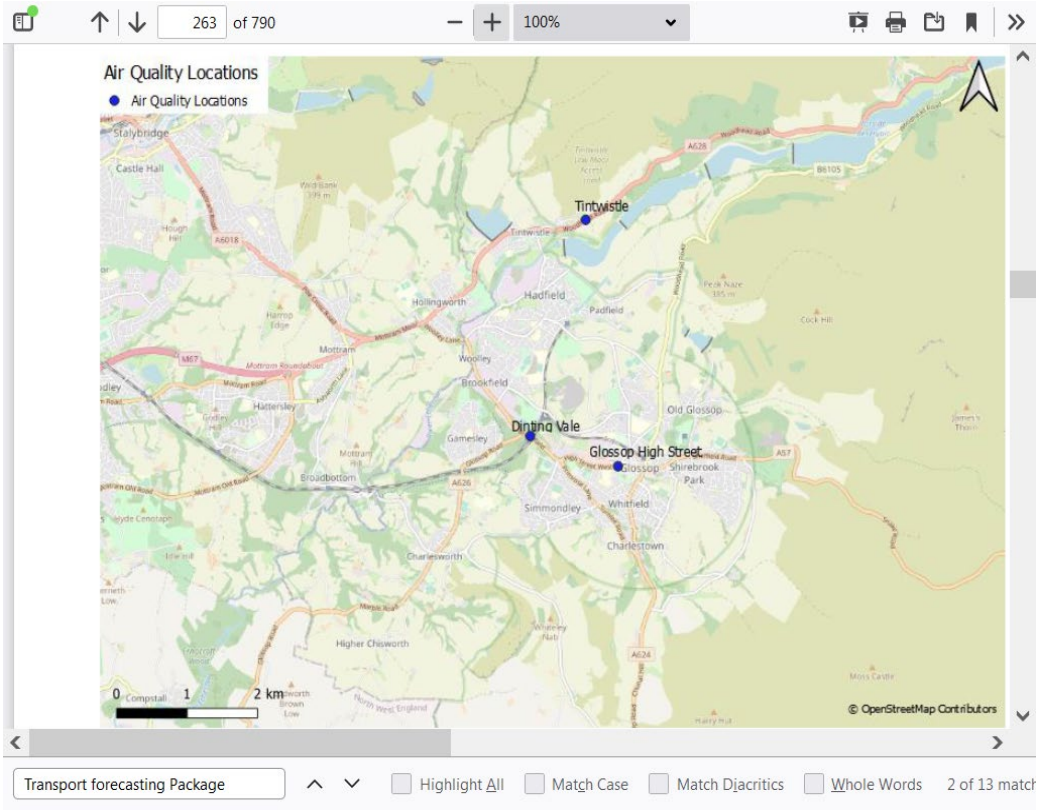
Between 2015 and the time when the work was done for the modelling for 2025 and 2040 **the consultants were changed.**

Here is the description of that switch, from the Stage 3 Combined Modelling and Appraisal Report obtained eventually from HE and made public by CPRE. (Examination library document REP2-090) **:** *(my emphases)*

7.3.1. Initial air quality (AQ) modelling undertaken by Arcadis in July 2018 indicated that an unmitigated TPU scheme could have significant AQ effects and jeopardise the application for development consent. Changes in traffic flow and speed as a result of the scheme were predicted to cause exceedances of the AQ strategy objectives for annual mean nitrogen dioxide (NO2). The primary locations where a negative AQ impact was reported were the village of Tintwistle (A628) and the specific locations on the A57 route through Dinting Vale and Glossop High Street, as shown in Figure 7-1

(Figure 7.1 is the next slide

7.



7.3.2. Atkins was commissioned by Highways England to undertake a review of the work done by consultants Arcadis at PCF Stage 3 for the proposed TPU scheme. The aim of this process was to strengthen the robustness of the modelling, under high levels of scrutiny for the Development Consent Order (DCO).

Following the presentation of the review findings in the summer of 2019, Atkins was commissioned to implement its recommendations and finalise PCF Stage 3.

7.3.3. As such, details of how the base model has been developed during the finalisation of PCF Stage 3 are provided in section 8, resulting model metrics are shown in section 9 and a summary is presented in section 10.

_____ End of Power-point notes _____

COMMENTARY ON THE KEY MESSAGES WHICH COME TO US OUT OF THE BAR CHARTS.

1 The DM-2025 flow predicted for the M67 J 3 / 4 location cannot be correct.

If this is true then the entire model is put in doubt, and so I myself was in doubt over it. It seemed extraordinary that this could be possible. Maybe there was a way that HE's 2015 counts-based figure could be the same as the figure predicted by the model for DM-2025?

I went into a loop of researching whether traffic on roads similar to the M67 or A57 had been static from 2015 onwards up to the pandemic. Then it could make sense that a DM-2025 modelled figure might actually be the same as the 2015 counts. In the Road Traffic Estimates in Great Britain – 2019 I found official Department for Transport (DfT) graphs showing the growth in traffic on motorways, on urban A roads, and on the SRN. [1]

But I needn't have bothered. Having done all this research I went back and had another look at the relevant bar chart *(slide 14).* The answer was right there staring me in the face. [2] The 2019 figure, which is a Department for Transport automatic traffic count (ATC) figure, is far higher (24% higher) than the 2015 HE baseline figure.

And so the conclusion stands. It is utterly implausible that DM-2025 should be the same as HE 2015, and therefore it is virtually certain [3] that the DM figure is wrong.

2 The anomalies.

The two anomalies – items 6 & 7 in the list of key messages above – share the same pattern. In both cases, **the traffic flows predicted for Tintwistle and the road towards Snake Pass**, the one sensitive at this examination because it is an AQMA, and the other sensitive at this examination because it crosses a National Park, **are lower or far lower respectively than the flows immediately to the west of them.**

Tintwistle

So at Tintwistle, the DM-2025 flows are predicted to be 6250 (39.2%) lower than the flows at Hollingworth Market Street just a few hundred yards to the west on a continuous road with no major junctions, while the DS-2025 flows are predicted to be 5240 (33%) lower. The DfT figure for the same locations is a gap of 2884 (19.8%) ***(slides 14 & 18)***

There is something going on here, but whatever it is goes on far more in the modelled flows than in the DfT counts. How can this increase in drops in flow between Hollingworth and Tintwistle be explained?

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1 All from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/916749/road-traffic-estimates-in-great-britain-2019.pdf

2 That is why writing these submissions takes so long. ☺

3 I follow the scientific convention that nothing is ever CERTAIN – hence the addition of the word "virtually". But to me this looks pretty "certain"

Snake Pass

In the same way, but much more dramatically, traffic between Glossop High Street East and Snake Pass seems to miraculously disappear in vast quantities. ***(slides 24 & 28)*** There are no obvious origins or destinations for the approximately 11,500 missing vehicles.

So it appears that we have here at least one and possibly two examples of MMMC's to go with the one at Market Street in Mottram. [4] Note that an MMMC is a Massive Magic Manhole Cover.

Here are tables of these figures for the two locations:

DROP IN TRAFFIC FLOW AADT BETWEEN HOLLINGWORTH AND TINTWISTLE

	DfT 2019	HE 2025-DM	HE 2025-DS
Hollingworth Mkt. St.	14560	15950	15900
Tintwistle	11676	9699	10659
percentage drop Hollingworth to Tintwistle	19.8%	39.2%	33.0%
numerical drop Hollingworth to Tintwistle	2884	6251	5241
increase in percentage drop over DfT2019		19.4	13
increase in numerical drop over DfT2019		3367	2357

NOTE DfT Hollingworth is based on 2015 manual counts
DfT Tintwistle is based on 2019 manual counts

DROP IN TRAFFIC FLOW AADT BETWEEN GLOSSOP HIGH STREET EAST AND SNAKE PASS

	DfT 2019	HE 2025-DM	HE 2025-DS
Glossop High St. E.	7045	14550	15600
Snake Pass	4008	3050	4200
percentage drop Glossop High St. E. to Snake Pass	43.1%	79.0%	73.1%
numerical drop Glossop High St. E. to Snake Pass	3037	11500	11400
increase in percentage drop over DfT2019		35.9	30.0
increase in numerical drop over DfT2019		8463	8363

[4] See my DL3 submission page 2 section headed: The Mottram Market Street anomaly. (library REP3-032)

NOTE

DfT Glossop High St. E. is based on 2019 manual counts
DfT Snake Pass is based on 2017 manual counts

3 The rat runs or "alternative routes."

The charts ***(slides 24&25; 28&29)*** show clearly that Glossop High Street West (an AQMA) traffic is modelled to fall a lot while High Street East traffic is modelled to rise a lot, when compared to 2019 DfT figures. [5]

We now know that this is due to traffic being routed by the model to rat runs or "alternative routes" and thus the model shows the traffic flows being removed from the A57 south of Brookfield Road and as far as the main crossroads in the centre of Glossop, and with that, from the Dinting Vale AQMA.

a) the rat runs were unknown to the public at consultation stage

The first point to make is that HE failed to inform the public about a plan which would route thousands of extra vehicles through the back streets of Glossop, if the scheme were to be built. This alone makes the consultation carried out in November/December 2020 invalid.

Mr. Bagshaw said that local residents in Glossop had been "disenfranchised" by the actions of Highways England. They were indeed disenfranchised and I return to this whole question of lack of information from HE – its huge extent, and its effects - in Chapter 5 check all "chapter" mentions in doc of this submission.

I can imagine that HE might dispute the use of the words *"their plan to route thousands of extra vehicles through the back streets of Glossop"* in the paragraph above. Was it as a result of an *intention* that this increase in traffic on Glossop's back streets will occur if the road is built? Or was it merely a *prediction* based on already observed behaviours – namely that drivers can and do use these rat runs currently?

Whether it was an intention or a prediction the result is the same – HE are counting on an increase in traffic on the back streets, whether it is *encouraged* by signage, or left to just "*happen,*" an increase which serves to reduce the traffic predicted to flow into the Tinting AQMA and thus lower the traffic there to below the threshold which would trigger a specific AQ assessment and/or below the level which would mean illegal levels of pollution. [6]

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[5] Note that DfT Glossop High Street West is derived from a manual count conducted in 2012, while the DfT Glossop High Street East is derived from a manual count conducted in 2019.

[6] There are complexities and indeed caveats on the matter of air pollution, what its effects are, and the rising stringency of what are considered to be harmful levels. I hope to deal with this in a later submission, if that proves to be necessary.

This increase in traffic on the back streets was known to HE and withheld by HE – and so I believe that the word *"planned"* is appropriate.

b) the impacts of these rat runs taking more traffic

How many streets?

Below is a table with the figures for the roads affected for which ES App. 2.1 showed figures:

SIDE ROADS IN GLOSSOP DO SOMETHING (DS) versus DO MINIMUM (DM)

	Shaw Lane	Dinting Road	Cemetery Road	Norfolk Street
2025-DM	6900	3100	5150	8200
2025-DS	7900	4500	5750	9900
percentage increase DS over DM	14.5%	45.2%	11.7%	20.7%
numerical increase DS over DM	1000	1400	600	1700

The first observation which needs to be made is that there are many other "main back streets" which are slated to have more traffic if the scheme were to be built and which are not on this table because we do not have the figures, for example the streets on the so-called Hadfield alternative - and there may well be others, such as Newshaw Lane

Once again, he said wearily, **can you please ask the applicant to produce now for the examination what they should have produced at the outset, namely a table and maps showing clearly traffic flows in ALL of the "main back streets" of Glossop's residential areas for which they have figures, existing flows and predicted future flows if the scheme were to be built.**

Then all stakeholders could begin to grasp and look seriously at all the different types of impact of this extra traffic on people who live along, and use, these roads.

What do we do about the impacts?

The applicant's view – we do nothing

My second observation is how shocked I was by the applicant's apparent refusal at the Issue Specific Hearing on Wednesday the 9th of February to consider these impacts, sheltering behind some guidelines that they have found which mean that they do not have to bother.

Here is the relevant quote from ISH2 **Wednesday 9th February, transcript 2**

"59:18
see cake on national highways, it would just point out that the issue (= Institute of) environmental management and assessment guidelines suggest that a threshold of an increase of 30% in traffic to trigger is a significant effect on the road network. So you have in terms of deciding whether mitigation is required. You know that it's a fairly high threshold that is, is the guideline in Environmental Assessment guidelines. And I think the guideline is 30% to 60% is considered A minor adverse impact or 60 to 90% is considered moderate and then over 90 is considered a major adverse impact"

I must add, for completeness' sake, this was said later:

"1:16:14
natural highway representing national highways. Just to clarify the point I made about the IEMA guidance is that guidance regarding traffic and transport impacts those those proportional changes in traffic flow do not apply to noise re quality, which have their own separate criteria. So just to clarify that point"

This leaves all the other impacts in play of course. And indeed noise and air quality too. **HE may wish to airbrush out these impacts, you however should not do so**. May I remind you at the risk of sounding like a broken record, of the relevant subsections in the Planning Act 2008:

"Section 104 [F1Decisions in cases where national policy statement has effect]

…….

(3)The Secretary of State must decide the application in accordance with any relevant national policy statement, except to the extent that one or more of subsections (4) to (8) applies.

……..

(7)This subsection applies if the [F12Secretary of State] is satisfied that the adverse impact of the proposed development would outweigh its benefits"

Clearly what we are considering here, namely negative impacts from traffic being diverted on a large scale into residential areas, is an adverse impact.

Frankly, I don't give a damn about the Institute for Environmental Monitoring Association's guidelines. [7] In this case I prefer to use my native wit, which tells me that what we see here is a

[7] To check how scathing I was being about these guidelines, I went and had a look. The IEMA's guidelines on Traffic Assessment date back to 1993 (!) so they basically go back to the Ark, and are the oldest guidelines in their library. They are currently being revised. Why did the representative from HE refer to ancient guidelines on traffic impacts? They don't actually USE them, they use EIA I presume?

massive problem with the applicant's proposal and needs to be properly assessed and thought through. The footnote bears out my gut feeling on this.

And I prefer also to keep in mind the children as they make their way to school. I want them to be safe, I want the parents to be confident that they are safe, I want them to learn independence, I want them to concentrate on talking with their friends and not on staying alive. And that is just a glimpse into one aspect of the impacts of this increase in traffic on roads where we should be focusing on quality of life and where the potential for doing this is so great.

So my view – we do something about the impacts

This section was headed: "What do we do about the impacts?" The answer is they should be listed properly instead of suppressed, analysed to a degree, and thought about with a real desire to tackle them, including of course, alternative solutions to the scheme which brings about or worsens the problem.

In practice, the first thing is to abandon the road scheme for a multitude of reasons and then set about tackling the clear and present issues in these residential areas, and creating a sustainable, fair and health-promoting transport system. Creating Safe Routes to Schools would be a great place to start . . . And with a budget of £228 million [8] the sky would be the limit to create a great place to live and work (as aspired to in the "Levelling Up" documents *(see footnote 8)*).

c) the applicant's approach . . . and the consideration of alternatives

Yes, the children's journey to school is just one aspect of life affected by this HE workaround, which benefits HE as they seek a DCO. HE are getting themselves out of a hole called the Tinting AQMA problem by putting lots of other people into one, because that it what this plan boils down to. It is in effect a stealth attack on the quality of life of thousands of people. We really have, as a society, to do better than this. In fact it is now part of the government's flagship policy to do better than this. [9]

Stepping back a little we can see that what has happened is that the applicant has proposed a scheme. He has found an obstacle, a serious obstacle, a problem which threatens to derail the scheme. In order to deal with the problem he makes a workaround "solution" but in so doing he has created another problem which is as big as if not bigger than the first problem.

Many people or organisations faced with such a dilemma would think hard about the two problems. And if the dilemma looked as if it was insurmountable then they would reconsider the original idea and think to themselves: Is there a better way to do this? Is there an alternative solution?

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[8] Though I hear that HE have kindly lowered the bill to something over £180 million!

[9] I will be looking at the "Levelling Up" White Paper. in a later submission. It is another government policy with which this scheme is out of sync.

This is the step which is obviously missing from the way HE has approached this whole situation. If there was really no alternative then one would have to shrug one's shoulders and let it go. But of course we know that alternatives do exist it is just that HE has not considered them. [10]

But these alternatives are before this examination. I set out what a complete alternative would look like in my written representation at deadline 2. And CPRE submitted a more complete plan also. Given that the consideration of alternatives is mandated in various documents which have standing in this EiP (NPS-NN and Environment Act 1995, to name two) I trust that these alternatives will be one of the topics at the next issue specific hearing, and I request that this is so, if we get that far. (**Request to ExA)**

d) but the rat runs might not work as planned

Indeed they might not. The model says:

TEMPORARY END TO CHAPTER 1

Chapter 3: The shortcomings of the Transport Assessment Report

INTRODUCTION

This chapter is an item by item critique of the Transport Assessment Report presented to the Planning Inspectorate as part of the application for this scheme.

I remember being shocked by it when I first read it. I wrote a lot of notes in the margin with big question marks and exclamation marks. It has not got better with re-reading, in fact it has got worse.

In this chapter I invite you the ExA to see for yourself, and then consider what is to be done about the TAR and what it represents.

I will go through the topics in alphabetical order, for ease of reference.

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[10] It is not really HE's fault. As I said in my DL2 submission, the clue is in the name. They are not geared, as we have seen at this EiP, to consider alternatives AT ALL. For example the TAR totally ignores them. Please please recommend in your report, among your other recommendations, that regional investment strategy and delivery be revamped to reflect new realities.

TOPICS LIST

The topics are as follows:

1. Accidents
2. Alternatives
3. Buses
4. Climate change
5. Glossop
6. HGV's
7. Journey time
8. The model and overall impacts
9. Reliability
10. Severance
11. Trains

TOPICS ONE BY ONE

1. ACCIDENTS

Baseline

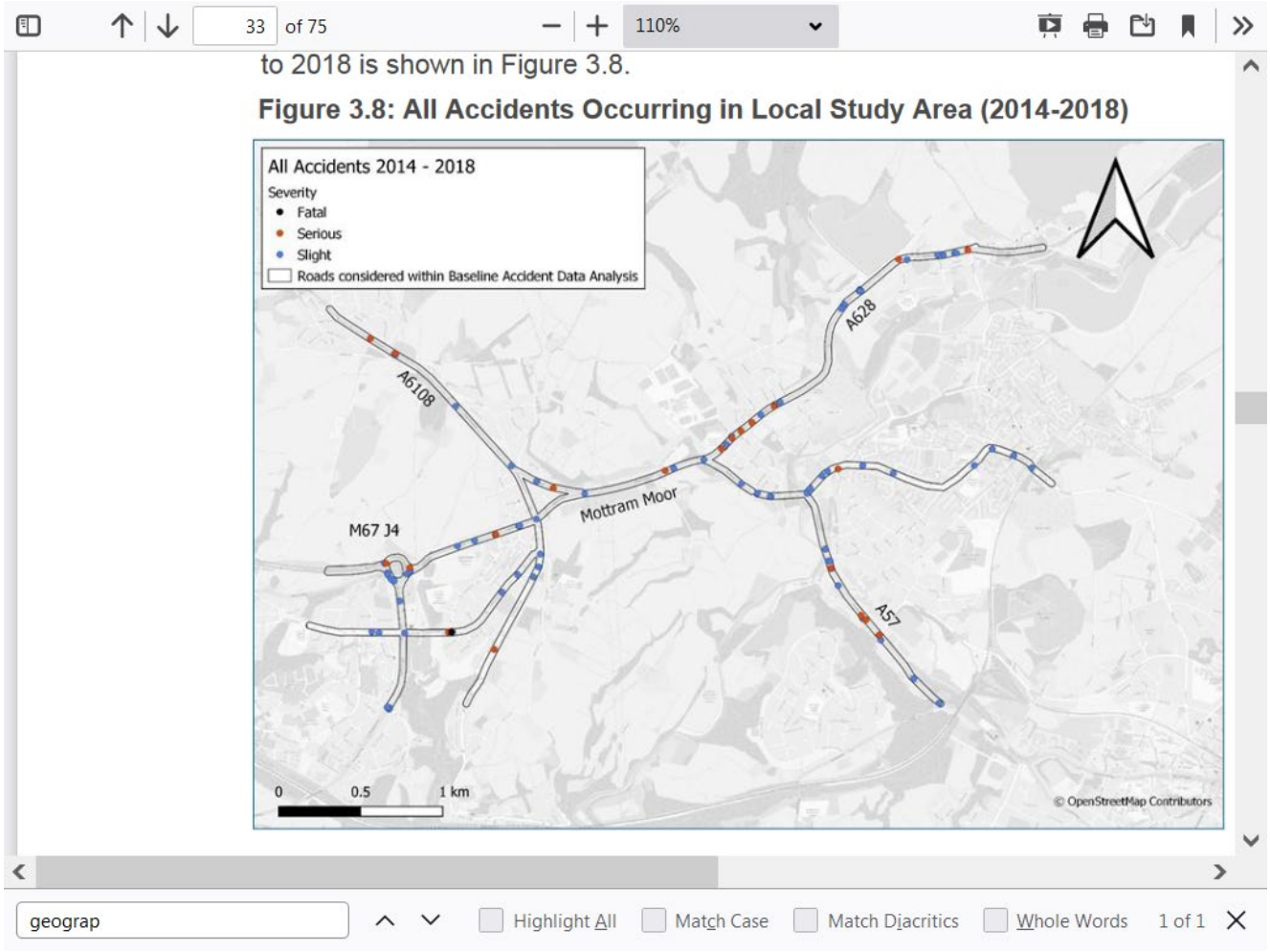
Scope of TAR's "study"

Under the heading "Existing Issues," the TAR presents basic accident data both in table form and plotted onto a map for the road network (paras. 3.7.3 to 3.7.6).

In paragraph 3.7.4 we read:

"The study area used for assessing the baseline accident data is set out in Figure 3.7. The geographical extent of the study area is in line with the study area outlined in Figure 3.1. It is considered that, by using this study area, the analysis will capture the major roads through the area and omit residential roads, upon which the scheme is not expected to have an impact. A 20m buffer from these roads has also been added in order to capture any accidents that may have occurred on junctions joining the roads" *(my emphasis)*

Here is the Figure referred to above, showing where the accidents happened in the "study area".



From this we see that the TAR writers have drawn the extent of the area they will study in a way that excludes residential areas, on which the scheme "is not expected to have an impact". And yet with the same publication date of June 2021, the ES Appendix 2.1 clearly shows the increased flows on certain key residential roads within Glossop. Increased flows, according to the TAR, [11] lead to more accidents.

According to HPBC, in their LIR at para. 7.33 there are indeed predicted to be extra accidents on Glossop residential streets due to the scheme:

"ROAD SAFETY AND COLLISIONS

accident rates

[11] 7.2.8 A safety assessment ..... estimates the number of accidents for each road link over a 60-year appraisal period, based on the product of:

- The accident rate per million vehicle kilometres;
- The road length; and
- The forecast annual traffic flow

"7.33 The scheme is forecast to have the largest impacts on the A57 Snake Pass - situated immediately to the east of Glossop. . . . . This will create negative impacts for journeys eastward to / from Sheffield along the A57 due to the scheme, with an estimated accident impact of approximately £-3.5m along the A57 and approximately £-.5m to £-1m along Shaw lane / Dinting Road through Glossop."

Why is there no mention in the TAR of these accidents valued at between half a million pounds and one million pounds along just one residential street in Glossop? How many of these streets are routes to school? How will the threat of these accidents support the government's desire to promote active travel for all of its many benefits?

Why do we have to depend, in this EiP, on detective work by a stakeholder, to learn what we should have been told by the applicant?

Going a bit beyond the TAR, but absolutely on the same point, we read in the Summary Comments of the HPBC LIR the following (fancy bullet point 8):

"**Severance and safety for non-motorised users.** The increase in traffic and congestion through Glossop could pose a safety concern in relation to key school walking routes and affect shopping habits within the town centre – potentially affecting town centre vitality. This is not considered in the ES."

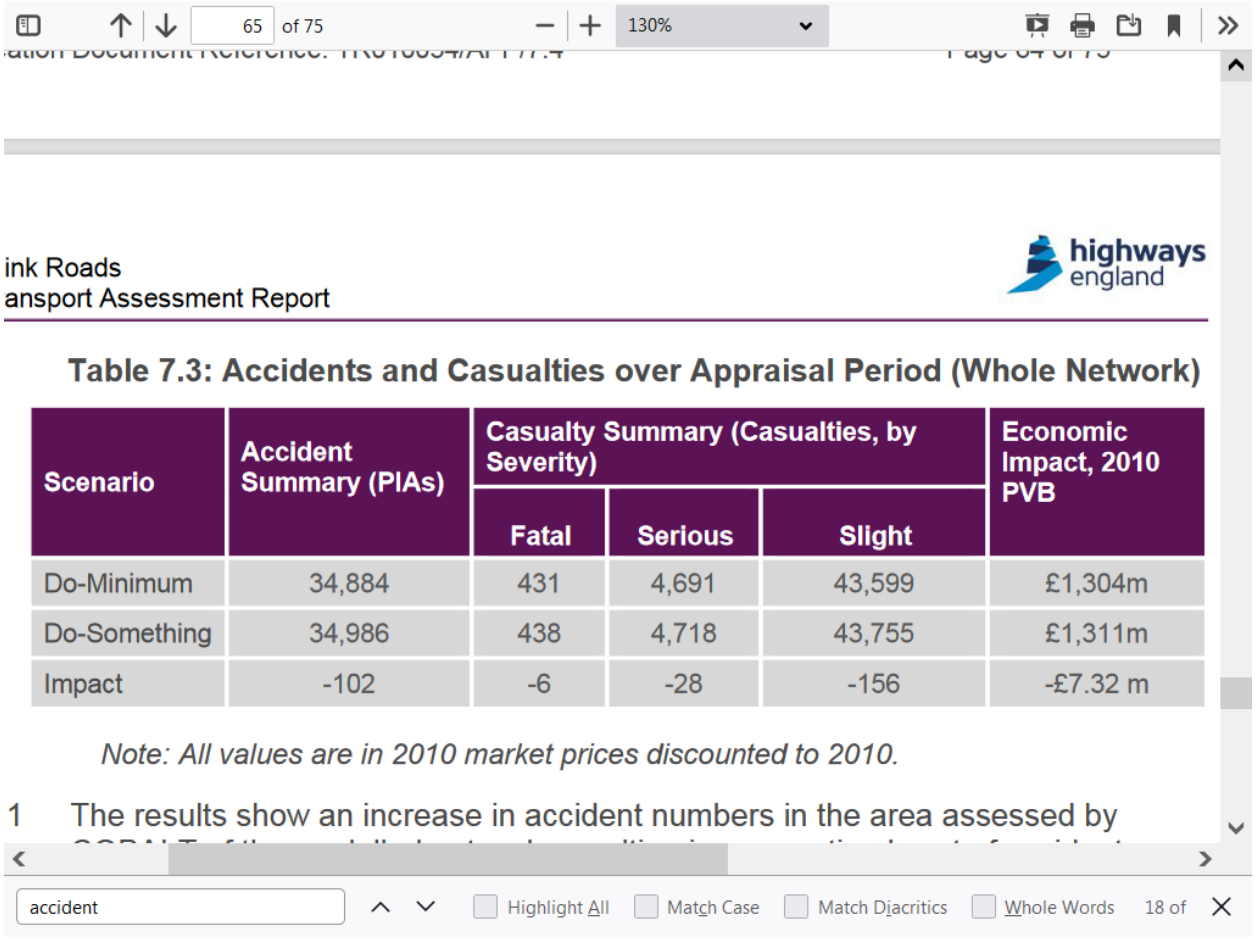
So not only does the applicant's TAR ignore this matter but so does the ES. Could the ExA ask the applicant why this omission has occurred and whether it is compliant with the EIA regulations? (**Request to ExA)**

Method of predicting number of accidents, and reducing them

I am well aware, due to my activities in a previous life, of what it takes to prevent road accidents, and the first requirement is to identify the causes. I see no attempt in this TAR to establish what accidents happen along the roads which the applicant is planning to route more traffic down (see Chapter 1 zzz) and what the causes of those accidents were, and hence to be able to predict the effect of this additional traffic on accidents, and hence to take effective preventative action. Assessment? What assessment?

Basic error in the information

I copy below TAR Table 7.3 which tabulates the accidents actual and predicted on the network:



65 of 75 130%

ink Roads
ansport Assessment Report

highways england

Table 7.3: Accidents and Casualties over Appraisal Period (Whole Network)

Scenario	Accident Summary (PIAs)	Casualty Summary (Casualties, by Severity)			Economic Impact, 2010 PVB
		Fatal	Serious	Slight	
Do-Minimum	34,884	431	4,691	43,599	£1,304m
Do-Something	34,986	438	4,718	43,755	£1,311m
Impact	-102	-6	-28	-156	-£7.32 m

Note: All values are in 2010 market prices discounted to 2010.

1 The results show an increase in accident numbers in the area assessed by

accident Highlight All Match Case Match Diacritics Whole Words 18 of

The column showing fatal accidents gives a figure of 431 fatal accidents in the Do-Minimum scenario and 438 fatal accidents in the Do-Something scenario. Is gives the difference between 438 and 431 as 6. This is not correct. And with fatal accidents there is no such thing as a rounding error. ☹

How can this error have slipped through any checking process? How can this error even have been made? This table presumably comes from a spreadsheet. And so my mind is filled with disquiet and so should yours be. See my comment on the Rogoff spreadsheet error in my DL 1 Submission. Zzz

2. ALTERNATIVES

At the ISH 2 hearing on Wednesday 9th February, I remember that you asked HE, under the heading of "Traffic Modelling" about traffic restraint etc. – it was Item 3 question d).

HE's representative went into a long digression about HGV's and totally ignored the wider and deeper questions you had posed about restraint of motor vehicles, encouraging active travel, and promoting routes which avoid the National Park. In other words he avoided the question of alternatives to the scheme, even though they are mandated by both NPS-NN in general terms, and

by the Environment Act 1995 and government circulars 4/76 and 125/77 in relation to the protection of National Parks. [12]

This Chapter's sections on buses and rail will look at what the TAR says about the existing situation of these two elements and the potential there is for improvement. This section however looks at the consideration given by the TAR to alternative solutions taken in the round.

The scheme that is being put forward at this examination suffers from a multitude of problems many of them backed by legal requirements. I hope to list these legal requirements at another deadline, but for now I will just list the problems:

- The impact on climate change;
- The impacts on residential streets;
- The failure to solve the problems of Hollingworth, Tintwistle and Glossop,
- The problems surrounding air quality;
- The impacts on the National Park;
- Impact on the green belt
- The extra ordinary cost when all these problems are taken into account, pre-empting other better expenditure

And so you would think that a responsible applicant, in line with the relevant guidance, (see footnote 2) would take a serious look at specifying and assessing alternative solutions.

Here is a simple list of what the TAR could have and should have considered:

1. Whether and to what extent the existing bus service could be improved
2. Whether and to what extent the existing rail service could be improved

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[12] The first Circular states: ""It is now the policy of Government that investment in trunk roads should be directed to developing routes for long distance traffic which avoid National Parks; and that no new road for long distance traffic should be constructed through a National Park, or existing road upgraded, unless it has been demonstrated that there is a compelling need which would not be met by any reasonable alternative means."

And the second Circular states; ""Where there is a compelling need for some solution to be found to the problem of increased through traffic, or to problems of road safety, in a National Park, a determined search should be made for alternatives which do not involve upgrading the existing route or new construction."

While Section 62 of the Environment Act (1995) sets out specific statutory duties for National Park Authorities and other bodies. For National Park Authorities, the duty is to: - "Seek to foster the economic and social well-being of local communities within the National Park"4. While for other specified bodies, the duty is: - **"To have regard to National Park purposes when exercising or performing any functions in relation to, or so as to affect, land in a National Park."** *(my emphasis)* The LIR goes on to state that this clause applies to National Highways as they are now called.

3. The effects of such improvements on modal split and therefore on traffic flows, and consequently, on all negative impacts of traffic
4. especially on accidents, air quality, noise, severance and climate change
5. What the benefits of such an alternative might be for other zzz elements going beyond the reducing of the negative impacts, such as equality and the goals of the levelling up agenda
6. How the problem of HGV's travelling through the area could be resolved
7. Whether an alternative solution covering all these factors could and should replace the scheme , including some work on evaluating value for money

Some notes on the above follow.

For 1 and 2 see the sections on busses and on rail.

On 3, 4, and 5, see my chapter on Alternatives in Chapter 4 of my Deadline 2 submission, and the work of the CPRE.

On 6, I clearly remember that HE's line on this is: [we looked at some form of restriction on lorries in the area/on the routes across the Park and rejected it.] They say so in their reply to the question you posed at the ISH 2 Wednesday Hearing, as mentioned above.

With respect this is not good enough. They have to justify not looking at different HGV options at THIS examination. I copy below table from the TAR showing freight movements across the Pennines, with a rough idea of origins and destinations. Note, firstly that it is for "inter-peak" movements. I have no idea why they should choose this segment only, but it does not inspire confidence. Where are the missing figures? And secondly, note how many trips are NOT from Sheffield to / from Manchester (to improve which trip, we are constantly told, is the goal of this whole exercise)

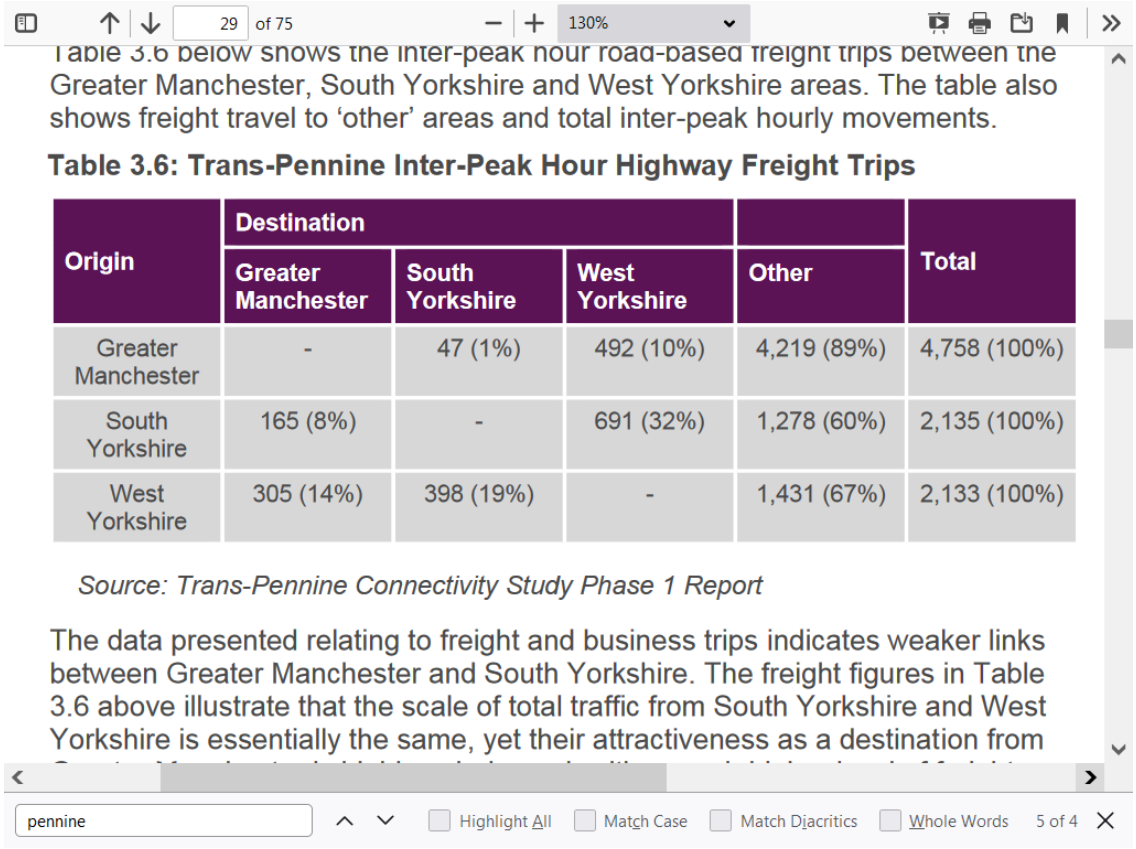

Table 3.6 below shows the inter-peak hour road-based freight trips between the Greater Manchester, South Yorkshire and West Yorkshire areas. The table also shows freight travel to 'other' areas and total inter-peak hourly movements.

Table 3.6: Trans-Pennine Inter-Peak Hour Highway Freight Trips

Origin	Destination				Total
	Greater Manchester	South Yorkshire	West Yorkshire	Other	
Greater Manchester	-	47 (1%)	492 (10%)	4,219 (89%)	4,758 (100%)
South Yorkshire	165 (8%)	-	691 (32%)	1,278 (60%)	2,135 (100%)
West Yorkshire	305 (14%)	398 (19%)	-	1,431 (67%)	2,133 (100%)

Source: Trans-Pennine Connectivity Study Phase 1 Report

The data presented relating to freight and business trips indicates weaker links between Greater Manchester and South Yorkshire. The freight figures in Table 3.6 above illustrate that the scale of total traffic from South Yorkshire and West Yorkshire is essentially the same, yet their attractiveness as a destination from

From M/C to "Other" is 89% of trips out ofM/C. From Sth Yorks to M/C is just 8% of trips out of South Yorks. And from West Yorks. Just 14% of trips are bound for M/C. Clealrly not many freight trips are so essential now that they have to take this route. So they are in the business of CREATING new trips. By HGV. Which will be the last vehicles to decarbonise. Any alternative would seek a) to get this traffic out of the national park, and b) get this freight, as much as possible onto rail.

Not a word about this in the TAR

On 7 Value for Money takes in "all of the above" especially when the new measures in the Green Book include well-being factors whenever possible.

In view of the fact that consideration of Alternatives is mandated and the strong reasons for so doing, can you please ensure that in some way, not necessarily via a revised TAR, there is at this examination a proper consideration of an alternative package in outline with costings to illuminate the choice before us? **(Request to ExA)**

3. BUSSES

"The local area is well served by buses" declares the TAR. There then follows a table which states that from Glossop to Manchester city centre there is one bus per day, from Glossop to Hyde there is one bus per hour, from Hollingworth to Broadbottom there is one bus per day and so it goes on.

There follows a map at figure 3.5 which displays bus frequencies incorrectly and which omits the 341 bus service bypassing Mottram Moor to the south namely the Glossop - Hyde service. [13]

The section concludes with the extraordinary statement at paragraph 3.4.1: "It is expected that bus services running through the study area will benefit from improved journey times and reduced congestion." We know of course that this simply is not true (see the section on Journey times), so what is it doing in the TAR?

That is a serious question. How can such a misleading statement find its way into the *Transport Assessment*?? What value can we put on any of this? Why are they seemingly so intent on gilding the lily? This is not a selling job, is it? It should be a government agency setting out what it reckons to be true so that a good decision can be arrived at.

However, looking at the positive side, it is abundantly clear that there is vast scope for improvement for bus services in the area. My chapter on Alternatives in Chapter 4 of my Deadline 2 submission sets out the first steps one would take to achieve such an improvement. (page 19 in "NOTES ON THE ABOVE"

4. CLIMATE CHANGE

The phrase "climate change" does not occur in the TAR. Nor even does the word "climate." A clearer indication of the mind-set which has brought this scheme to examination one could not find. Enough said!

Still, a few words should be said. It is absolutely extraordinary that a document calling itself a Transport Assessment Report and written in 2021, when a Climate Emergency has been declared, could have no reference at all to climate change. We are told nothing about the immediate consequences for the climate of constructing his scheme. We are told nothing about climate consequences of this scheme in its operational phase. And yet of course both contribute to filling the carbon bucket which this nation has at its disposal.

The bucket is finite and set down in statute. We can emit only a limited quantity of CO2 and other greenhouse gases. If the scheme were to be built then other perhaps worthier candidates for making emissions would be set aside.

And as I have argued in my Deadline 2 submission, we need to be ultra-cautious, not carefree with that bucket. ALL the uncertainties are on the downside. Our collective future is at stake. The odds are not favourable, in fact they are far worse than most people have been led to believe. But you would not even know that climate was an issue at all, from reading this document.

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[13] The principle error is that the 237 bus is every 20 minutes, which I make to be 3 per hour, and yet the frequencies on most of its route (the route running through Hadfield in a loop, past Hollingworth and down to Mottram are wrongly marked.

For the reason of impact on climate change alone, this scheme should be evaluated against alternatives. I would only add that in the 790 page document which was released by CPRE and which sets out the technical background to the modelling, the phrase "climate change" also does not appear once. We must all tremble, when an organ of government, a wholly-owned company of the State, is behaving in this insouciant way with our destiny.

The applicant appears to have a blind spot as big as an asteroid when it comes to climate change. I know that you have now asked the applicant to do a proper assessment into the climate impacts of the scheme in its context but the fact remains that we have here a scheme which is being put forward by an agency which seems blissfully unaware of what climate change means for the country as a whole and for the future of this scheme in particular., at a time when government is ratcheting up commitments on climate change in every relevant policy announcement.

5. GLOSSOP

This section allows me to point out all the occasions where Glossop is simply ignored.

If you search for the word Glossop in the TAR you will find out that it has a railway station and a bus station. There have also been many improvements made to the process of gathering traffic data in Glossop. It is also mentioned in the many journey time calculations from Glossop away to the west involving the new link roads. It is also mentioned once in connection with accidents – "a small increase in accidents is expected through Glossop" - as it is coyly put in para. 7.2.13

There is no mention of the problematic diversion of thousands of vehicles into the residential streets of Glossop. The phrase "through Glossop" in the sentence I quoted just now suggests that the accidents would be on the main road. It is a careful avoidance of the real issue which is that accidents are predicted to increase along Shaw Lane and Dinting Road.

So although there are many mentions of improvements to the model made.in data collection in Glossop, there is no mention whatsoever of the various alternative routes being "planned" [14] by HE to the main A57 through Glossop.

So the additional accidents which are to be expected as a result of diverting this traffic through residential streets, the time delay experienced by passengers on the buses using streets which now see additional traffic, the inconvenience and anxiety of crossing roads which are now far busier than they were, the additional noise and pollution; this is all airbrushed out of existence.

Transport Assessment Report? I think not.

[14] "Planned" in the sense which I explain in zzz

6. HGV's

The percentage of HGVs in the traffic along the A628 is fantastically high at around 1 in 7 of all vehicles but their impact on people, on communities, on the general environment, and even on the fabric of buildings is out of all proportion to their number.

So one would expect in a document called Transport Assessment Report some facts about past and recent trends in HGV numbers and behaviour, some consideration of likely or possible future trends, some assessment of specific impacts, and the potential future for these impacts, and assessment of how numbers of HGVs travelling through this area could be reduced whether by improved logistics, by increased use of rail, or by other policy levers, but there is nothing at all about any of the above.

There is not even any suggestion that AAWT might be a better metric than AADT on many occasions when discussing traffic flows and traffic impacts. AADT, by being an average figure which includes both night-time and weekend, flattens the figures; it stretches out the impact over a longer time. It does not paint as accurate a picture of what people experience most of the time as AAWT, and in AAWT the percentage of HGVs, for example in Hollingworth, is substantially higher (see ES figures in Appendix 2.1) zzz check this!!!

The clearest indication that something is not right in this treatment of the subject of HGVs is the fact that there is no discussion whatsoever of the possible diversion of HGVs into the planned rat runs in Glossop such as Shaw lane/Dinting Road or the Hadfield Alternative.

The only commentary on HGV's in the TAR is a broad-brush analysis of freight movement, at one period of day, namely inter-peak, of their origins and destinations by region. That is the sole consideration given to HGVs in the area despite the enormous harm that they cause. The section on Alternatives discusses what proper consideration of HGV's within the context of an overall alternative, would look like.

7. JOURNEY TIMES

Local routes journey times

The TAR states at paragraph 3.4.1: *"It is expected that bus services running through the study area will benefit from improved journey times and reduced congestion"*

On Wednesday 9th February the representative of HE said this at the open hearing:

"It [the model] takes those routes which are judged to carry you know, through traffic proportions of significant portions of through traffic and the view is that the model has picked up those key routes in Glossop Dale particularly the route that is mentioned in some of the written representations you know, denting road and shore lane and that that that route is alternative to Glossop High Street, which is known to be an existing alternative route the traffic uses to avoid congestion in Glossop and because this scheme does not do anything to relieve congestion in Glossop but attracts more traffic along the 857 some of that traffic inevitably ends up following that that rat run as you call it along tinting lane and shore. So, tinting road and shore lane. And that is what the model showing. So the model we believe is accurately representing those runs that people have discussed" *(my emphasis)*

(NOTE: I have not edited this except to remove where the transcription repeats words, which it does repeatedly!)

So, we get two versions of the truth separated by 8 months. We could have had the truth straight away - no?

HPBC's consultants seem to be versed in the arts of getting to the truth it seems, and here is what the HPBC LIR says about journey times:

"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" *(my emphasis)*

In summary, the TAR reports on the routes where there are reductions in journey times, but not on the routes where the opposite is the case. They then make a statement about bus journey times which is falsified but only by what they haven't said. This is clearly unsatisfactory. The reader is not getting an accurate picture – or "assessment".

Longer routes journey times

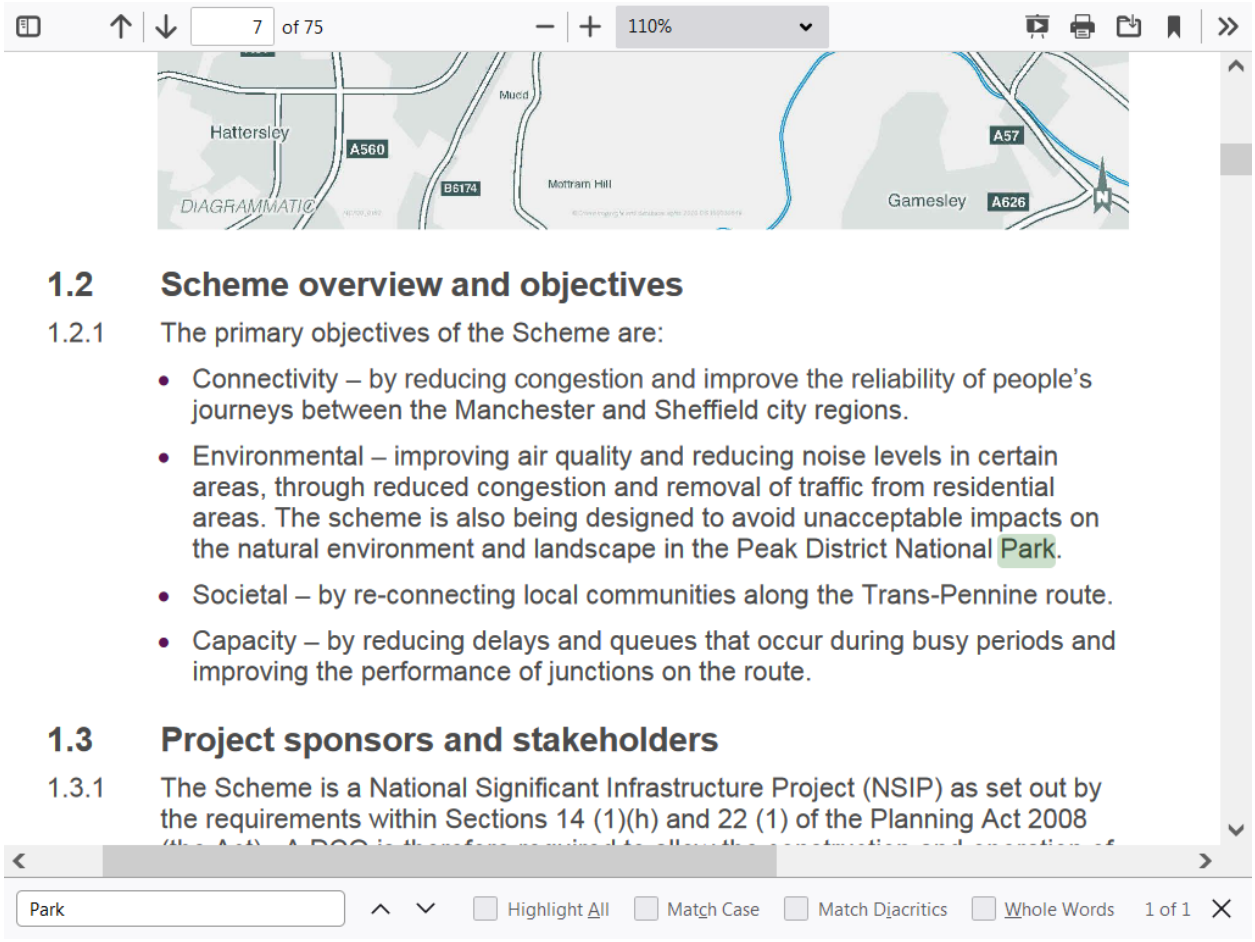
We have been repeatedly told that the rationale for this scheme is mainly that it improves connectivity between Manchester and Sheffield. A key element of this is journey times. Another is reliability which I deal with in a separate section.

So if the journey time between Manchester and Sheffield is such a critical part of the justification for this scheme; indeed along with reliability it is it's raison d'être, then one would expect the Transport Assessment Report to quantify the reduction in journey times that the scheme might bring and in particular to consider the two ends of the journey – how long does it take to get from the point at which one enters the destination city to one's final destination within that city?

But having read this far you will not be surprised to learn that there is nothing in this report. There is no assessment of overall journey times, there is no assessment of all the factors which might influence journey times, there is no assessment at all.

So what are we to make of this key claim, that connectivity will be improved and therefore employment opportunities, economic growth etc. will follow?

But maybe this claim does not exist. I have just checked the consultation brochure for the 2020 community consultation. The phrase "journey time" is nowhere to be found. Instead the document uses the more vague phrase of "reliability." Maybe they knew that the claim of improved journey times could not be made to stack up. The TAR itself lists the objectives of the scheme as follows:



They do not hang their hat on journey times being reduced, only on "reliability"!

I would ask the ExA to be very wary indeed of claims around journey time and to ask the applicant specifically about what they believe the truth to be about journey times between origins and destinations in the two cities of Sheffield and Manchester as it seems that HE themselves have little to say on this matter. (**Request to ExA)**

Yet I feel sure that it forms part of their "case" – ah, I have remembered. It pops up in their Economic Appraisal, as follows:

7.2.3 The Scheme is forecast to produce benefits of £156m (PV) by the end of the 60-year appraisal period. These benefits are generated by:

• Travel time savings, vehicle operating cost and user charge benefits of £181m;

……."

So there you have it. Journey time savings are a big part of the economic appraisal for the scheme. But if that is so, then it is vital that HE be asked to produce the evidence. This evidence should be in the TAR, but it isn't.

8. THE MODEL AND OVERALL IMPACTS OF THE SCHEME

The traffic modelling underlies the entire scheme. It determines the impacts, it makes the case. The TAR gives some details but omits the essentials.

The TAR tells its readers which acronyms have been used to create the model. It tells us about the switch of consultants but it gives no reasons why, and it tells us of the enhancements made to the model, with additional counts and additional zone disaggregation carried out in the Glossop area. And it reports in map and in tabular form nearly all of the baseline and predicted flows.

However the TAR is silent as to the factors which underlie the model, the values assigned to these factors, and how it is all put together, and how we can know that the outputs are in any sense realistic. For example there is not a word about the traffic growth assumptions which are embedded in the predictions.

We are confronted then with a black box and we are expected, we are perhaps being encouraged, to take it all on trust. The effect is to deny to all stakeholders any insight into the model. The stakeholder making an effort to understand is denied access and so the model and its results are put beyond question and beyond challenge.

The other major omission of the TAR with respect to the model is that the predictions output by the model are not fully reported, even though the TAR claims that they are, saying, at para. 7.1.4:

"The full list of changes in 2 way AADT on the local highway network is shown in Table 7.1 along with the percentage change in AADT from the DM option."

Only it is not the full list. Why say it is the full list when it isn't? Oh, just an error, I expect HE would say. But you have to assess this little inaccuracy with all the other failings in this Chapter. In fact the model's predictions about the diversionary routes in the residential areas of Glossop are nowhere to be seen and yet these figures were available, and indeed the TAR describes additional work carried out in Glossop to improve the model. The model's predictions about Tintwistle, which again are clearly sensitive and important information, are again nowhere to be seen, even though there is a special table and map (paras. 7.1.5 and 7.1.6 refer) showing the flows predicted for the wider area.

It is utterly wrong for the applicant to conceal this information only for it to be dragged out during the examination; it is just not the correct way to proceed. The flows on the smaller roads in Glossop were buried in the ES Appendix 2.1, while the figures on Tintwistle are not even showing in that Appendix.

What is it with HE? Why is this information not laid out for all to see at the outset?

9. RELIABILITY

The truth about reliability

The TRANS-PENNINE ROUTES FEASIBILITY STUDY STAGE 1 REPORT, FEBRUARY 2015 describes in detail the factors which lead to the unreliability of the Transpennine route. One is road closures, which is obvious to anyone who knows these routes. As the report says (para. 1.2.4):

"1.2.4 The trans-Pennine routes face a number of operational challenges. The HA's A57/A628/A616/A61 strategic route experiences a road closure every 11 days on average with two third of these being longer than two hours and some 77% of these closures are the result of either road traffic collisions or bad weather. The non-trunk routes are also prone to weather-related closures."

Having done the detail, the report summarises as follows:

"1.3 Current Challenges and Priorities

1.3.1 The challenges identified have been prioritised to ensure that the next stages focus on the most important problems faced by the trans-Pennine routes. An assessment has been made on the basis of whether the challenges have a direct impact on connectivity between Manchester and Sheffield. The following is a summary of these high priority challenges:

- 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"

(my emphasis)

The second bullet point alone is arguably addressed by the scheme before us. Not one of the others is mentioned in the TAR. Why is this?

I would suggest that it is because the scheme does not and cannot address any of these issues.

But it is dishonest, in a *transport assessment*, to ignore these. The reader is misinformed by omission.

Note that the writer of the TAR is aware of this report, citing it when dealing with severance (at para. 3.7.14).

The importance of reliability in the case for this scheme

And yet reliability is the feature of the scheme which gets top billing in the objectives listed at paragraph 1.2.1 of the TAR, linked to the magic word "connectivity":

"1.2.1 The primary objectives of the Scheme are:
• Connectivity – by reducing congestion and improve *(sic)* the reliability of people's journeys between the Manchester and Sheffield city regions"

And it was the first promise which the scheme's promoters made to the public in the Consultation Brochure (page 8):

"The scheme will:

Reduce congestion and improve the reliability of people's journeys – through Mottram in Longdendale and between Manchester and Sheffield"

This makes it all the more shocking that the TAR simply ducks the issue. Is this an assessment or a sales brochure? Please will you insist that HE explain the absence of any proper assessment of this aspect of the scheme, given its importance? (**Request to ExA)**

Further information

For the sake of completeness, I give a blow by blow account of the references to "reliability" in the TAR in an Appendix to this Chapter.

10. SEVERANCE

In a section in the TAR entitled "existing issues" we read this (para. 3.7.14):

"Earlier studies, including the Trans-Pennine Routes Feasibility Study Stage 1 Report (2015), identified severance and issues for vulnerable users in urban areas of the A628 and non-trunk A57 and A628, including the A57 through Mottram and Hollingworth. The high volume and high percentage of HGVs and associated noise and air quality issues are a deterrent to pedestrian/cycling trips along and across the A57. The Scheme will reduce the volume of traffic and percentage of HGVs on the existing A57 through Mottram and will enhance pedestrian and cyclist provision within Mottram."

The issue of severance is an important one and affects many roads throughout the area, in different ways. In some places such as the A57 down from the Gun Inn towards the centre of Glossop the issue is getting across the road at all, due to the traffic volumes. In other places, the issue is very light flows leading to higher speeds by motorists and consequent fear and danger, as is cited in a recent DL 4 statement, by a newcomer to the EiP. *(Emma Kane submission, library REP4-018)*

There are of course roads where the traffic will be reduced, were the scheme to be built, and others, as we are now all aware, where it will increase – both posing different problems.

None of this is reflected in the TAR. You would not know about the continuing problems in Tintwistle, for example, where, we are informed in the 2015 report cited above, [15] the accident rate is particularly high:

"1.2.11 The A628 also experiences a high number of pedestrian accidents within the urban section through Tintwistle at its western end."

How is it that the 2015 report can tell us about pedestrian accidents in Tintwistle (and anyone who has stood alongside the road in Tintwistle as I have can understand how this could be) and the TAR says not a word?

How is it that there is no discussion of the extra traffic to be loaded onto Dinting Road/Shaw Lane?[16]

The TAR's only message on severance is "The Scheme will reduce the volume of traffic and percentage of HGVs on the existing A57 through Mottram and will enhance pedestrian and cyclist provision within Mottram"

This is indeed a very severe case of tunnel vision. I can only shake my head in disbelief that such a document can be before this examination.

11. TRAINS

In section 3.4 the TAR sets out the existing situation with regards to rail passenger services. It lists the frequencies on the Hope Valley line to various destinations and it gives journey times between Manchester and Sheffield. It also shows where the railway stations are in the area, says what the frequency is into Manchester and lists existing patronage of the stations. And that is all.

There is no analysis, not even a mention, of the potential for modal shift to rail. The TAR tells us that the frequency into Manchester from Glossop is 2 trains per hour. Could this be increased? Are the necessary paths available? If they are not available now are they likely to be available in the near or medium-term future under existing expansion plans? What might the effect be of different amounts of modal shift to rail on the road network, in particular on congestion and on air quality, but also on all traffic nuisances? What is the policy environment with regard to rail, both at regional level (Greater Manchester, Sheffield City, Transport for the North) and national level?

Looking more specifically at the Trans Pennine connection between Manchester and Sheffield, what will the impact be of the capacity scheme now being implemented on the Hope Valley line? This scheme is not even mentioned in the TAR. What is the potential of this line for freight now that more pathways will become available? What capacity will this line have for passenger movement? What will the new journey times be for through services? To what extent is the rail

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[15] TRANS-PENNINE ROUTES FEASIBILITY STUDY STAGE 1 REPORT, FEBRUARY 2015, to be found on the UK government website

[16] Subject to the caveat that the traffic may not divert as much as predicted . . .

connection more reliable than The Snake Pass and the Woodhead pass? Are there other advantages which might attract commuters and other travellers to rail and away from road?

There is not a word about any of these matters in the TAR.

I have covered the significance of Rail in the broader context of constructing a better alternative to the scheme and why this should be before this examination, in the section on alternatives.

CONCLUSION (Chapter 3)

It is in the process where we see what someone's intentions are. Does this document look like the work of an organisation which seeks to inform the reader and encourage sound and evidence-based debate? Or does it look like something else?

I think I have shown that there is a huge amount of information missing. There is nothing about the Glossop workarounds - the alternative routes to the A57. There is nothing about how the model actually works and what factors are built into the calculation. There is no discussion of alternatives. We are not told about the improvements being carried out right now, as the examination is in progress, on the Hope Valley railway line which runs parallel to this proposed scheme, and which is inherently more reliable and more climate-friendly.

The absence of any proper information on HGV's, severance and reliability is shocking, likewise the selectiveness of the information on journey times, and the inadequacy of the approach to accidents. Glossop is airbrushed out of exiatence.

If the TAR is a joke it is a very bad joke. I do not know how angry I can be. The public, and you, Sirs have been badly let down by this document.

I invite you, the ExA, to ponder on these things. What is going on here? What is the motive for HE's behaviour when they set before you and all stakeholders a document such as this and call it a transport assessment? We are still in the process of winkling out information which should have been in this document or rather the examination should have been building on properly assembled and presented facts and consideration of the transport aspects of this scheme.

Still, it is never too late, as they say. Please will you put right all the gaps in knowledge revealed by this paper, where you have not already done so – I highlight what I think are the most egregious failings which need to be resolved by you, Sirs, in the run of the text, always accompanied by the words (**Request to ExA)**

Contd.

APPENDIX

WHAT THE TAR SAYS ABOUT RELIABILITY

What does the TAR say about how much additional reliability the scheme will bring to this journey and how that sits within the overall picture on reliability? This Appendix gives a full account of every reference to this key notion in the TAR.

In its treatment of the concept of reliability, in the first paragraph of the introduction, paragraph 1.1.1 we read:

"The A57 and A628 between Manchester and Sheffield currently suffer from heavy congestion creating unreliable journeys which limits journey time reliability. This restricts economic growth due to the delays experienced by commuters and business users alike."

In the following paragraph we read:

"the current A57 around Mottram in Longdendale suffers from congestion which limits journey time reliability. This restricts economic growth due to the delays experienced by commuters and business users alike. ....."

These two sentences suggest to the reader that the cause of lack of journey time reliability is congestion. No other factor is mentioned, so the clear implication is that congestion is the only factor. But saying it twice does not make it true. The extract from the TRANS-PENNINE ROUTES FEASIBILITY STUDY STAGE 1 REPORT, FEBRUARY 2015, which I quote from in the main text, and which is known to the author of the TAR, show that congestion is just one of a whole range of factors which cause delays.

In paragraph 1.2 1, where the objectives of the scheme are set out, we read the same connection made between congestion and unreliability without the mention of any other cause.

At paragraph 1.4.4 we read:

"Current journey times and reliability of the connecting routes compare unfavorably with links between other cities a similar distance apart."

This is true. But the TAR does not attempt to explain why this is so and assess whether the scheme is a good way of tackling these issues.

Next, in the section headed "economic appraisal overview" we read at paragraph 2.4.3:

" the benefits of the scheme are the net benefit experienced by the road user and wider society with and without the scheme which has been calculated from a number of sources, such as:

..... Reliability impact due to changes in journey time variability ....."

There are four further references to reliability in the context of economic appraisal. The last one is significant. We read at paragraph 7.2.6 that the value of improved journey time reliability in the

adjusted BCR is £11 million. The same paragraph also lists wider economic benefits as being worth £97 million.

So the improved journey time reliability is worth around one tenth of the value of the wider economic benefits. A more accurate sense of the small value of the journey time reliability benefits is gained if we place this value in the context of all the benefits of the scheme which in total are valued at £264 million. (See 790 page document released by CPRE, pdf page 64 library ref: REP2-090)

When you remember that these figures are all for benefits extending over a 60-year period, then it becomes apparent how modest the journey time benefits are.

And finally in Table 10.1 performance against scheme objectives, there is one repetition of the claim that reducing congestion in the Mottram area will improve journey times on trips between Sheffield and Manchester; there is a claim that " reduced journey times and improved reliability will increase the accessibility of the Scheme and associated routes" (whatever that means) and there is a statement that a reliability assessment has been carried out which shows that local journey times "will become more consistent on a day-to-day basis."

In summary

In summary the TAR does not attempt any analysis or assessment of how reliability is enhanced on a transport route and how this scheme might improve reliability between Manchester and Sheffield. It repeatedly suggests that tackling congestion on a small fraction of the total route somehow delivers improved reliability between Manchester and Sheffield. In the context of the list of factors considered and then highlighted in the 2015 report, this is insignificant. Exactly how insignificant we cannot possibly tell.