TR010034 – A57 Link Roads

DEADLINE 6 SUBMISSION, PART 1

Comments on a Deadline 5 submission

9.53 Applicant's Comments on Deadline 3 Submissions / Daniel Wimberley

Daniel Wimberley, Date Wednesday, 16 March 2022

Unique Reference: 20029775

NOTES:

1 HE's Deadline 5 submission, entitled "9.53 Applicant's Comments on Deadline 3 Submissions" is library ref Rep5-021

[redacted]

2 The Deadline 3 submission by myself to which HE replied in the document in Note 1 above is REP3-032

[redacted]

3 As is my custom, requests to the ExA are signalled in the text. I hope to gather all of these in a later Part of this Deadline 6 Submission.

1. Introduction

1.1. Highways England, in their document 9.53, have submitted to this examination their replies to many of the points which I raised in my Deadline three submission. For the references for these two documents see the box above.

1.2. For each reply which Highways England have made, I have copied in full both the extract which they copy from my DL 3 submission, to which they reply, followed by their reply. I then present my comments to their reply.

1.3. My thanks go to Highways England for these replies as they enable the discussion to progress. Many important points are clarified in my comments to their replies. I have attempted to summarise the key points to emerge in the next section.

1.4. Rather than tiptoeing around issues, as is commonly thought to be the English way, I have called the spade a spade where necessary. I think this gives a clearer view to the ExA and to other stakeholders of what the key differences of opinion, disagreements over facts, and attitude actually are.

2. Summary

2.1. Five examples of the discrepancies and implausibilities in the results of HE's traffic modelling are brought to light in this document:

2.1.1. the "Market Street anomaly"

2.1.2. the Bamford anomaly: a forecast *drop* in traffic through Bamford whilst the traffic *increases* by 38% on Snake Pass is implausible

2.1.3. the fact that HE's modelled flows on the M67 link for 2025 Do-Minimum are the same as their 2015 modelled flows, and this is not credible

2.1.4. the DfT figure for the M67 in 2019 (based on an actual count) is far far higher than HE's modelled prediction for 2025, which casts doubt on the latter, and

2.1.5. HE's claim that there would be no more traffic in the area if the scheme were to be built than if it were not is contradicted by the evidence, principally the fact that traffic flows on the M67 are modelled to be 7500 more in 2025 with the scheme than without it, and this traffic must give rise to additional trips.

2.2. **In the light of the above, the model and its outputs must be reviewed. Please will the ExA carry out this review. (Request to ExA)** NOTE: The switch of consultants in mid-project and its effects on the modelling and its outputs, in particular on predicted flows in AQMAs, must be part of such a review.

2.3. The factors involved in the model, the values assigned to these factors and the weighting given to these factors have NOT been stated for stakeholders in any of the public-facing documents, such as the Case for the Scheme or the TAR.

2.4. **In denying the public this fundamental information HE are not complying with their own licence, nor with the Nolan Principles**.

2.5. Data, especially data which puts into question the wisdom of proceeding with this scheme, should be made fully visible in the name of transparency and good ordering of the EiP.

2.6. Do-Something and Do-Minimum traffic flows should be compared with a baseline, the nearest possible to "current" flows.

2.7. This would make it more likely that a topic of concern, say Air Quality in a certain location, would be screened in or scoped in for investigation. If comparisons are made solely between Do-Something and Do-Minimum, as in the case of this scheme, then it is more likely that topics get screened out, or scoped out, as not meeting the criterion.

2.8. ALL the adverse impacts of the scheme have to be added up and compared with the benefits – see Planning Act section 104, subsection 7, as repeated in NPS-NN paragraph 1.2. Leaving out the baseline means that adverse effects are not fully captured. This also has a chilling effect on consideration of alternatives to the scheme.

2.9. HE seem to want to suggest that the scheme does not increase traffic in the area. The evidence shows that the scheme *does* increase traffic in the area.

2.10. The adverse impacts of the additional traffic being routed into residential streets in Glossop by the scheme matter and have to be given full consideration at this EiP. HE have provided no

information to the EiP on these impacts. They should not be wished out of existence by a public authority such as HE.

2.11. The additional traffic which is predicted on these local roads will quite likely be bunched, exactly like the existing traffic, thus increasing the scale of the negative impacts.

2.12. The increases in traffic, including the bunching effect, in Glossop's residential streets are indeed significant and will have a significant negative impact on many aspects of people's daily lives, including increasing accidents, if the scheme is built.

2.13. HE should not take refuge in obsolete guidance, but assess these impacts in a proper, rigorous manner.

2.14. HE's failure to look at these issues of impacts in local roads in Glossop seriously, or to present proper evidence to this Examination in Public, is not compliant with subsection 7 of section 104 of the Planning Act 2008

2.15. There must be a proper assessment of the additional severance, safety, and other issues, including the impact on bus services, caused by the projected increase in traffic on minor roads in Glossop. Specifically the assessment should include the provision by the applicant of a series of clear maps showing the traffic flows as they are now, and which they are predicting with and without the scheme, throughout the area, in the opening and design years, so that we can all assess for ourselves whether the effects on pollution, severance, accidents, intimidation etc. and bus services sticking to time, being asserted by different parties, are reasonable or not.

2.16. Please will you ask the applicant to carry out this assessment? (Request to the ExA) NOTE: this action could be part of the rewrite of the TAR which is needed on other grounds as well, see my DL5 submission.

2.17. In the Peak Park, just as in Glossop, *if you add the additional traffic* being forecast mostly at the *same times as existing traffic*, then you get far larger and more significant negative impacts at peak times than if you add this extra traffic as if it is exactly evenly spread throughout the day.

2.18. HE's assertions that *"for other bus services there may be a deterioration in journey times and service reliability due to increased traffic flows on some roads due to the Scheme, e.g. in Glossop"* (in this document) and *"It is expected that bus services running through the study area will benefit from improved journey times and reduced congestion"* (in the TAR) cannot be reconciled and cast doubt on their credibility.

2.19. The scheme's proposers ASSUME a given level of traffic growth. Which is then "disappeared" from consideration, and we just get, all the time, DS vs. DM, (Do-Something vs. Do-Minimum) thus obscuring the issue of the background growth, which is *itself* problematic. This omission of consideration of the baseline reduces the amount of adverse effects to be taken into account in screening decisions, and also makes traffic growth look *inevitable*, rather than something which is in fact *highly malleable* and could be lowered by effective local measures, as the government is now calling for.

2.20. According to the Planning Act 2008 section 104, subsection 7, the ExA is implicitly tasked with comparing adverse effects of the scheme against benefits. With this frame of reference, and bearing in mind the previous point, an alternative package is likely to deliver a far better benefits to adverse effects ratio than the scheme. Will the ExA confirm that

consideration of such alternatives will be given full weight, in line with adherence to the Planning Act? (Request to ExA)

2.21. Technical information such as that contained in the 790 page bundle released to the EiP by the CPRE should be made available by the applicant to stakeholders as soon as it is available, and not withheld, and there should be no untoward delays in compiling it.

3. Topics – DW text, HE replies and DW comments on replies

3. TOPIC 1 - THE TRAFFIC MODEL

DW

3.1. The overall accuracy of the picture (i.e. of the flows predicted by the traffic model) we are being presented with is questionable. Some things we are being told are hard to believe, there are major discrepancies, etc. Some form of independent peer review will be needed to address this matter.

REPLY BY HE

3.2. The traffic modelling used for the assessment of the Scheme has been developed, calibrated and validated in full accordance with Department for Transport's (DfT) Transport Analysis Guidance (TAG). Forecast traffic growth is based on factors derived from the DfT's National Trip End model in combination with forecast changes in traffic volumes due to committed developments and schemes. The traffic modelling has been subject to compliance with validation metrics, internal quality control by the consultants undertaking the modelling (Atkins) and independently reviewed by a separate team within National Highways. National Highways is therefore confident that the traffic modelling used to assess the Scheme is both fit for purpose and robust

DW COMMENT ON REPLY

3.3. This is classic process-not-outcomes talk. 'Look we have followed this and that guidance, books of methods, etc.' I noted in my submission the impression given to the reader by the bundle of documents 790 pages long. They speak of a process honed to a T, a process which covers all bases, is mature, and reliable. It looks convincing.

3.4. But that is all beside the point, completely beside the point. This is all a diversion from my point – that the RESULTS are, "hard to believe, there are major discrepancies, etc." If the 790 pages of technical description produce results that are hard to believe, then maybe HE could explain? I believe that the ExA should ask them to do just that. **(Request to ExA)**

3.5. At the time I wrote Deadline 3 submission I was aware myself that 'something felt not right' and that HE's answers to questions were inconsistent. Their claim that there would be no more traffic in the area if the scheme were to be built than before seemed to be obvious nonsense, and in direct contradiction of what they themselves had said, and I demonstrated this in that submission

3.6. I was led to the inadequacies of the model and to HE's cavalier approach to the selection of which evidence to reveal and which evidence to conceal, by the work of CPRE in uncovering the facts around the side streets in Glossop, facts which were not made public at consultation stage.

3.7. I have now done extensive research myself, and above all I have focussed on presenting the information CLEARLY and on highlighting WHAT DOES NOT MAKE SENSE. See Library REP5-039, (presentation in power-point form with bar charts, showing the predicted traffic flows around the network), and Library REP5-040, where I explain this presentation in detail. For a shortcut to the essential points, see pages 4 and 5: section headed "OVERVIEW - KEY MESSAGES FROM THE CHARTS"

3.8. Returning to HE's statements about the trust-worthiness of their model, I note that the factors involved and the values assigned to these factors and the weighting given to these factors have NOT been stated for stakeholders in any of the public-facing documents, such as the Case for the Scheme or the TAR. Maybe, for example, the value assigned to traffic growth is incompatible with the NZ2050 Strategy. You, Sirs, and all stakeholders as well, are being asked to take the trust-worthiness on trust, in that we are not being allowed to see how this works.

3.9. I have specifically asked for this information, back in 2020 – sigh – and been refused.

3.10. In denying the public this fundamental information HE are not complying with their own licence, nor with the Nolan Principles, Their 2015 licence states: *"Consultation" means consultation or engagement proportionate to the circumstances in accordance with government guidance on consultation principles fn1;*

3.11. The footnote takes the reader to the government principles on consultation as published by the Cabinet Office, in whatever form its latest version takes. The reference is here:

[redacted]

3.12. Relevant is the following extract: "***C. Consultations should be informative*** *Give enough information to ensure that those consulted understand the issues and can give informed responses. Include validated impact assessments of the costs and benefits of the options being considered when possible; this might be required where proposals have an impact on business or the voluntary sector."*

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4. TOPIC 2 – DATA "NON GRATA" – i.e. DATA UNWANTED AND UNLOVED BY HE

DW

4.1. Some data appears to be "data non grata" – data which is being kept, if not totally under wraps, at least, decently out of normal sight. This data should be made fully visible in the name of transparency and good ordering of the EiP.

REPLY BY HE

4.2. The Transport Assessment Report has been prepared in accordance with best practice guidance and presents all the key changes in traffic flows due to the Scheme across the affected road network in sufficient detail to enable a full understanding of its likely impacts.

DW COMMENT ON REPLY

4.3. Firstly, a general point about the TAR. It is an astonishing claim for HE to make, that it "has been prepared in accordance with best practice guidance" On Accidents, Alternatives, Buses, Climate change, Glossop, HGV's, Journey times, Reliability, Severance and Trains the TAR is lamentable. Much necessary information is simply missing and the presentation of what is included is highly selective.

4.4. Fortunately I do not have to debunk it here. I refer stakeholders and the ExA to my detailed 17 page critique in my Deadline 5 submission: Library REP5-040, pages 16-33.

4.5. One question however should go to HE – which guidance was this that they followed? Either it was guidance specially selected to allow the writing of an empty TAR which is in no way an assessment of anything, or the guidance was real enough and it was not followed.

4.6. The point stands: data, especially data which puts into question the wisdom of proceeding with this scheme, should be made fully visible in the name of transparency and good ordering of the EiP.

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5. TOPIC 3 – WHAT SHOULD WE BE COMPARING WITH WHAT IN THE MODELLING?

DW

5.1. At many junctures we are told that x, y, or z cannot be examined in detail. X, y or z has been "screened out" or "scoped out" because it did not meet some relevant criterion and this always comes back to statements by HE to the effect that: – 'the difference between Do- Something and Do-Minimum is not great enough to trigger investigation.' I believe that underpinning this mass non-investigation of matters, all of concern and some of them of extreme concern, lies a systematic methodological flaw which can and should be remedied.

REPLY BY HE

5.2. Screening out small changes in traffic flows from an impact assessment is industry standard best practice.

DW COMMENT ON REPLY

5.3. If the proposer of a scheme such as the one before us were to compare D0-Something traffic flows with a baseline, which would ideally be the nearest they could get to "current" flows, then the "increases" would be larger than the ones that they would register if the comparison were made with Do-Minimum. This would make it more likely that a topic of concern, say Air Quality in a certain location, would be screened in or scoped in for investigation.

5.4. If on the other hand the opposite were to happen, as in the case of this scheme, then it is more likely that topics get screened out, or scoped out, as not meeting the criterion, which is usually stated as there being a specified increase, in other words a limit value which has to exceeded for the assessment to be thought necessary.

5.5. So my comment on HE's reply is twofold. First, these are NOT small increases. Remember that under the Planning Act 2008 section 104, the task is to add up all the adverse impacts of the scheme and compare them with the benefits. As we know, air pollution damages people's health. Any increase in concentrations causes impacts. "Guideline levels" are political constructs which are

irrelevant to the task in hand, although legal limits, as we have seen in this examination, do have the use of focussing attention. . What matters is the science. I hope to cover this more fully in another part of my DL 6 submission.

5.6. Secondly, my point re comparing the flows being predicted *with* the scheme to the flows being predicted *without* the scheme, being misleading stands. A lower baseline, namely current flows, will lead to *bigger* gaps in the figures and hence an increased chance of scoping IN rather than OUT.

5.7. (Of course the DM figures of HE being used at this EiP seem to be artificially low and are consequently highly suspect, but that is a separate issue. I am talking here of what one might expect to happen with respect to screening in or out, under normal predictions.)

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6. TOPIC 4 - THE MOTTRAM MARKET STREET ANOMALY

DW

6.1. **HE replies Q.3.11**

HE's explanation of the forecast increase in traffic DS-DM on Market Street in Mottram, appears to be plausible. However my concern with the forecasts at Market Street (site number 6 on the maps on pages 52 and 53 in CftS,) is that the 2 streets south of Market Street (sites 4 and 5) which feed traffic into, and take traffic from it, each has a far larger flow than Market Street itself. How can this be?

HE REPLY

6.2. Traffic flows across the whole road network are forecast to increase with or without the Scheme. The Scheme changes the distribution of forecast traffic flows across the road network, with resulting increases in traffic on some roads and decreased traffic flows on other roads compared to without the Scheme. The Scheme does not result in an overall increase in traffic across the whole modelled road network compared to without it.

DW COMMENT ON REPLY

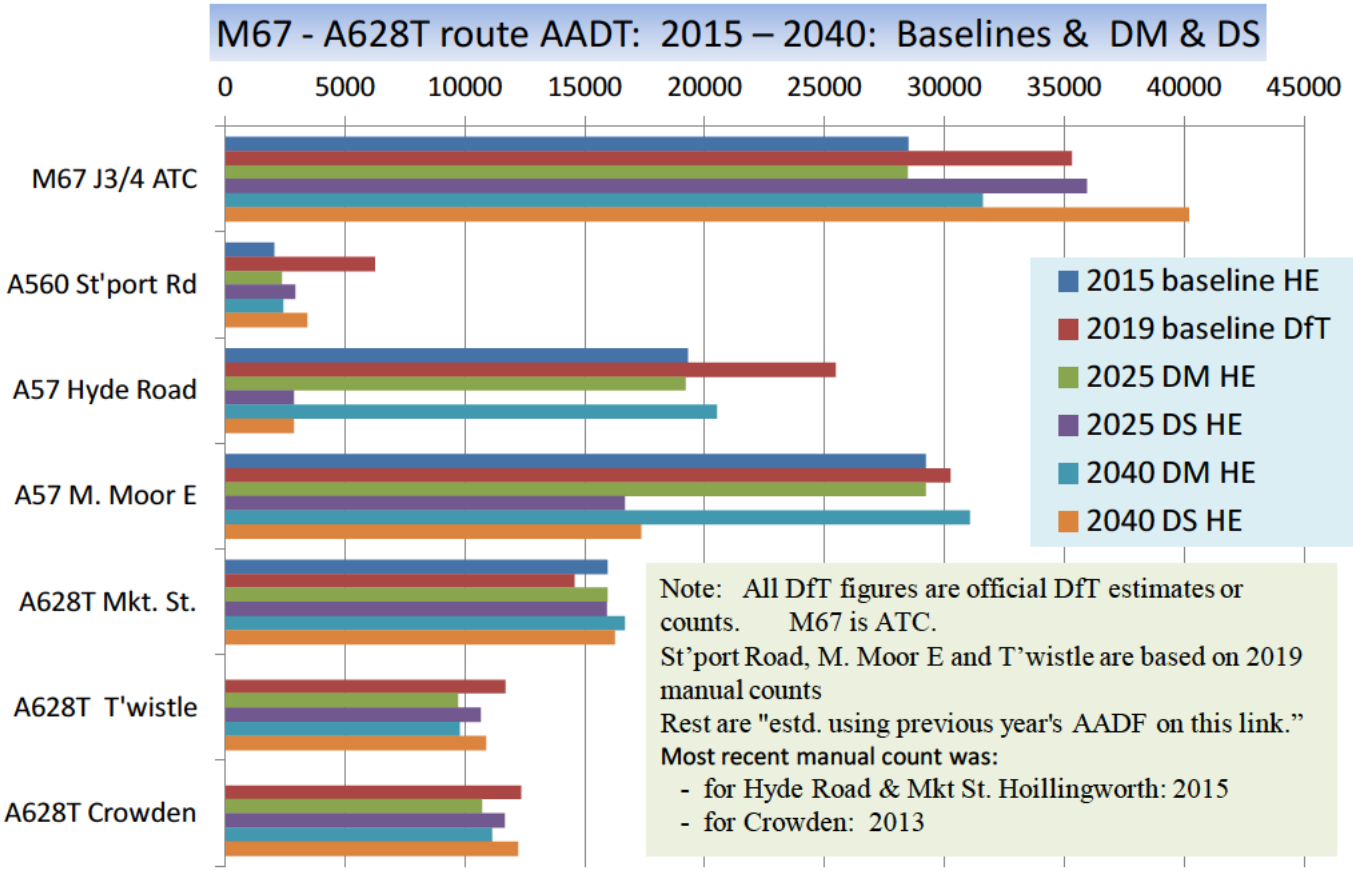
6.3. Two points, one related strictly to the point I was making about Market Street and the two roads south of it, and the other a more general point arising from HE's comment.

6.4. First, I do not deny that if the scheme is built, there will be increases in traffic on some roads and decreases in traffic on others. But Highways England have not answered the point I am making, which is that the traffic flows on Market Street and the two roads to the south of Market Street seem to be incompatible with one another. I am not alone in saying this, CPRE have noticed this too. It would be helpful if HE were to explain!

6.5. The second point refers to Highways England's claim in this reply that there is no increase in traffic across the whole modelled Road network if the scheme is built. That is not what I remember from the bar charts which I created - so let's take a look.

6.6. Slide 21 clearly shows that the traffic on the M67 is much higher if the scheme is built both in 2025 and in 2040 than if it is not. . Looking at specific roads the roads which are bypassed by the scheme, Hyde Road and Mottram Moor, both show a big reduction in traffic, while most other roads show increases. But the point is the biggest Road coming into this area, namely the M67, shows a very big increase in two-way traffic and that traffic must go somewhere or come from somewhere. And that

is what Highways England are not explaining when they say that there is "no overall increase in traffic" with the scheme.



6.7.

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7. TOPIC 5 - 'TRAFFIC WILL NOT INCREASE OVERALL'

DW

'traffic will not increase overall'

7.1. **HE replies Q.4.1**
First this is irrelevant to the question asked. No one is talking about whether there is more traffic in total in this area with or without construction. The question is: is the new to-be-constructed-perhaps road "inappropriate development"? If it does, then the question of justifying this intrusion has to be faced and at that point, issues such as the overall value of the road do arise. And, yes, the road clearly destroys the open and "natural" character of this land – it is strange for anyone to pretend otherwise. So – there has to be a good reason for doing this "inappropriate development" so . . .

7.2. Second, and more near to my concerns in this theme, is whether this statement can be true. It is a very puzzling claim. Some points:

7.3. In their answer to question 3.6 HE say that additional traffic is forecast to be attracted to the new link road from alternative routes.

7.4. In RR-0677-1 HE a) already admitted the re-routing (attraction) effect, b) stated that by 2040 the DS flows will be 10% more on the A628 and 38% more on Snake than the DM flows. And then claimed that **the total traffic kilometres over the appraised network will be the same with the scheme as without it.** This claim, together with the admissions re the increases, is made repeatedly in REP1-042

7.5. And yet I remember clearly that the overall picture which HE paints in CftS and TAR, and in CB also, is of a steady increase in traffic generally, and by extension in this area. Is this the case, or not?

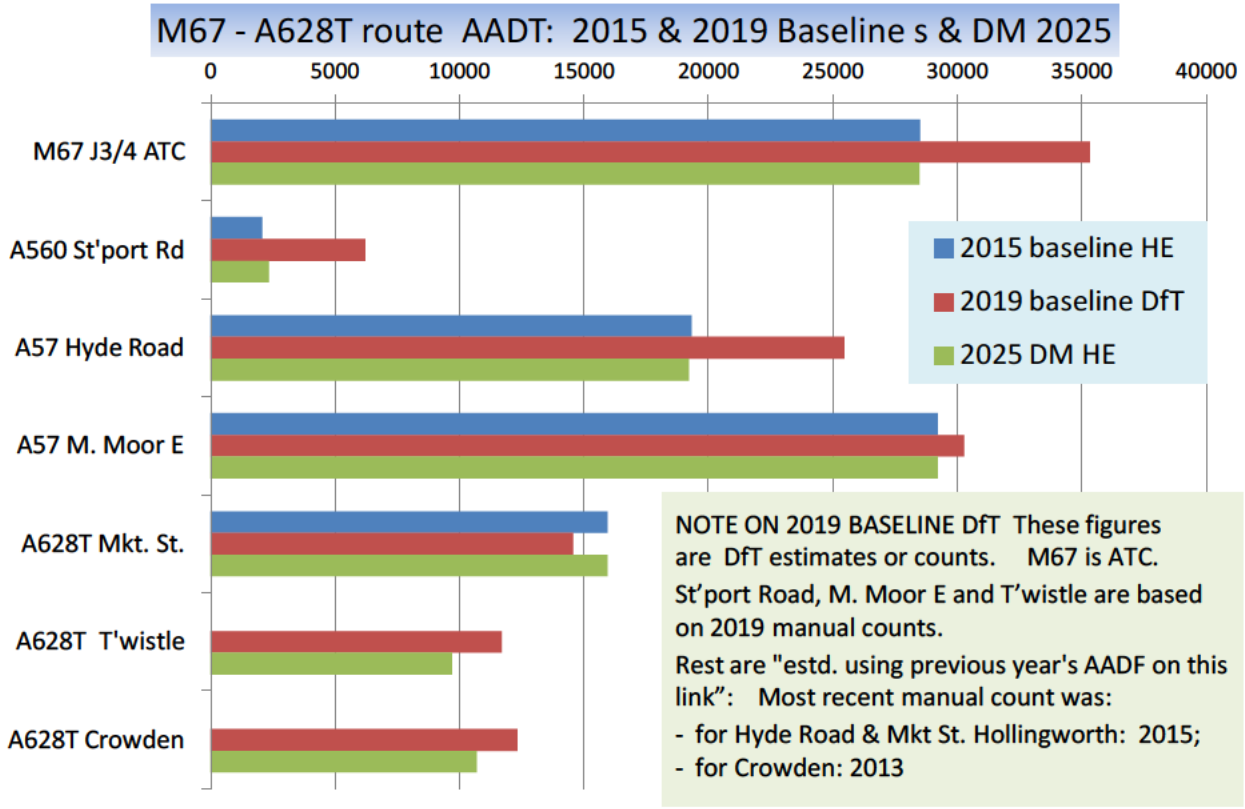
HE REPLY

7.6. Traffic flows across the road network are forecast to increase both with and without the Scheme compared to the current baseline situation. The Scheme results in a redistribution of traffic on the affected road network compared to the do-minimum, with some roads forecast to see increases, but these increases are balanced out by reductions on other roads. The redistribution of traffic does not, however, result in any significant overall change in total vehicle kilometres. There is a roughly equal increase in overall vehicle kilometres in both the Do-something and Do-minimum scenarios compared to the current baseline situation due to forecast traffic growth.

DW COMMENT ON REPLY

7.7. There are three points to make here.

7.8. First Highways England say: "Traffic flows across the road network are forecast to increase both with and without the Scheme compared to the current baseline situation." On the face of it, this is exactly what you would expect. However the bar charts tell a completely different story. Here is slide 14:



7.9. In this slide we see that the 2025 DM traffic flow on the M67 is going to be, according to the model, almost exactly the same as it was in 2015. Maybe there are some very special factors at work in Glossopdale. Well no, because we see from the Department for Transport 2019 figure that traffic on the M67 increases substantially between 2015 and 2019. And so it is very hard indeed to reconcile what this chart is telling us with what Highways England are saying in this reply

7.10. Secondly Highways England make the claim that "There is a roughly equal increase in overall vehicle kilometres in both the Do-something and Do-minimum scenarios compared to the current baseline situation due to forecast traffic growth." They want to suggest that the scheme does not increase traffic in the area. Quite why they want to suggest this when they have admitted that the scheme will attract traffic into the area I do not know. Here is what HE said in reply to the relevant representation of the PDNPA: (Rep1-042, item RR-0677-1)

"The Scheme reduces traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make both the A57 and the A628 more attractive routes for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes onto the A57 and A628, which means that ***traffic flows on both roads with the Scheme are forecast to increase****. The increases in daily traffic flows on the A57 Snake Road and the A628 Woodhead Road due to the Scheme in 2040 are forecast to be up to 1,450 and 1,100 vehicles respectively (Figure 7.6 of 7.4 Transport Assessment Report) (APP–185). This represents approximately a 10% increase in daily flow on the A628 and a 38% increase on the A57 Snake Road"* (my emphasis)

7.11. And, as I said in my comment to the previous reply, traffic on the M67 with the scheme, according to their own model, is predicted to increase substantially, by 7500 vehicles per day. See the first chart above.

7.12. The scheme DOES increase traffic in the area – at least if we accept Highways England's model [1]. So why do they say it doesn't?

7.13. And thirdly, if there is an increase in traffic in the area whether or not the scheme is built, due to forecast traffic growth, as Highways England say in the last sentence of their reply, then why is this increase airbrushed out of this Examination in Public?

7.14. If the proposer of a scheme such as the one before us were to compare DS traffic flows with a proper baseline, which should be the nearest they can get to "current" flows, then the "increases" would be larger than the ones that they would register if the comparison were made with DM. **This would make it more likely that a topic of concern, say Air Quality in a certain location, would be screened in or scoped in for investigation.**

7.15. If **on the other hand the opposite were to happen, as in the case of this scheme, then it is more likely that topics get screened out, or scoped out,** as not meeting the criterion, which is usually stated as there being a specified increase, in other words a limit value which has to exceeded

[1] Which I do not, see Library REP5-039, (presentation in power-point form with bar charts, showing the predicted traffic flows around the network), and Library REP5-040, where I explain this presentation in detail. For a shortcut to the essential points, see pages 4 and 5: section headed "OVERVIEW - KEY MESSAGES FROM THE CHARTS" - but presumably Highways England do . . .

for the assessment to be thought necessary. It is obvious that with a lower baseline the differences in flows will be bigger.

7.16. With a baseline which is actual flows now, then all differences in impacts become worse, and also more honest. By choosing to compare Do-Something with an equally hypothetical FUTURE flow called Do-Minimum, the underlying traffic increase is being "vanished" and with it the actual worsening of traffic nuisances which people will experience, and scoping decisions are being skewed in the direction of matters of concern being screened out.

7.17. I am sure that HE will say – this is how it is done – but as you, Sir, have hinted at in one of your questions, the argument from precedent may be flawed. After all, the job here, under subsection 7 of section 104 of the Planning Act 2008, and repeated in NPS-NN paragraph 1.2, is to evaluate ACTUAL harms against ACTUAL benefits, [2] and not 'harms artificially reduced – by – biased – guidelines,' against benefits . . .

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8. TOPIC 6 – THE ADDITIONAL TRAFFIC ON GLOSSOP'S LOCAL ROAD NETWORK AND ITS IMPACTS

DW

8.1. For example, when writing about "The requirement for the Scheme" in CftS (APP-182) HE say (Para. 3.1.2): *"There are many factors that presently reduce journey time reliability these include severe weather;* ***long term traffic growth which will bring some urban sections to their capacity;*** *maintenance on single carriageway sections; accidents; asset condition, including the standard, age and damage to infrastructure; and a lack of technology to assist in the operation of the routes and provide information to travellers"* (my emphasis)

8.2. Or for example, in Chapter 5, the economic case of CftS we read at Para. 5.1.6): *"The economic assessment is based on the assignment of a forecast Core Growth Scenario, with alternative sensitivity tests using Low Growth and Optimistic Growth assumptions for the volume of traffic using the Scheme (as aligned with TAG Unit M4 (Forecasting and Uncertainty). The* ***Core Growth Scenario traffic forecast*** (DW Note: which is the one used by HE, as I understand it, as their main forecast) ***is based upon what is deemed the most likely*** *land use and* ***traffic growth assumptions*** *for the route"* (my emphasis)

8.3. Or for example, in the TAR, (APP-185) we read, as part of the section on the "Future Baseline" at Para. 4.1.1: *"The Do-Minimum modelling undertaken predicts that vehicle flows on the highway links within the study area will continue to increase in a Do-Minimum scenario. Between* ***2025 and 2040, vehicle flows on all links except for the B6174 are forecast to increase."*** (my emphasis) After which TAR gives some examples.

8.4. Specifically there are plenty of roads with increased traffic. RR-0571 states: "Projections for the proposal indicate substantial increases in traffic and related emissions on the A57 Brookfield (31%), A57 Snake Pass (38%), on minor roads - New Road Tintwistle (50%), Norfolk Rd (21%) and Dinting Rd (45%), and small but significant increases on the A6016 Primrose Lane, A57 High St

[2] As per Planning Act 2008, section 104 sub-section 7

East, Shaw Lane and Cemetery Rd. All these roads have households living adjacent to them and Dinting Road has a school" This is very hard to reconcile with HE's claim.

REPLY BY HE

8.5. The impacts of the potential increases in traffic on these roads due to the Scheme have been assessed by National Highways and deemed not to give rise to any adverse effects on road safety or severance sufficient to trigger a requirement for any mitigation. This is on the basis that where there are notable proportional increases in traffic flows, the absolute increases in the number of additional vehicles is relatively low.

DW COMMENT ON REPLY

8.6. I take this reply to refer to the last bullet point in the DW text opposite, that is, to the roads which I cite there: New Road Tintwistle, Norfolk Rd and Dinting Rd, A6016 Primrose Lane, A57 High St East, Shaw Lane and Cemetery Rd.

8.7. This statement by HE sounds SO anodyne, it is written in the customary bureaucratic grey prose, referring to "mitigation" and soothingly claiming that the increase in the numbers of vehicles is not *that* great. The truth is far removed from this soothing picture.

8.8. I have to say, before beginning on this section, that my response to the reply of HE on this point is lengthy but **what Highways England have said here is critical to this Examination in Public**. **Do these adverse impacts of the scheme matter or do they not? Can they just be wished out of existence by a public authority who did not even tell the public about the extra traffic in residential roads in Glossop?**

8.9. **1.....The view of Highways England is not shared by High Peak Borough Council** (HPBC).

8.9.1. Here is an extract from their Local Impact Report (LIR):

8.9.2. *"**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."* (Summary Comments of the HPBC LIR, bullet point 8)

8.9.3. HPBC are implicitly calling here for a proper assessment to be done of the additional severance and safety issues caused by the projected increase in traffic on minor roads in Glossop. I ask the ExA to instruct HE to fill this gap, and to do this properly, bearing in mind all the matters raised in what follows. **(Request to the ExA)**

8.10. 2.....HE takes refuge in some obsolete guidance

8.10.1. This issue of severance etc arising from increased traffic on minor roads in Glossop, and whether it merited investigation arose in the Issues Specific Hearing 2 back in February. The HE spokesperson took refuge in some guidelines issued by the IEMA, as follows:

8.10.2. "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"

8.10.3. As I have pointed out in my deadline 5 submission, (REP5-040, page 14, footnote 7) these guidelines date back to the Dark Ages and the IEMA acknowledges this because they have called them in for review. So not only are the guidelines clearly inadequate, which I can see just by looking at the above extract from the transcript, but their sponsoring body also believes that they are inadequate. Why then do Highways England hold them up as their guidance in order to avoid doing what they should do.? Do HE not use EIA guidance?

8.11. 3.....are the increases in traffic significant or not, and what difference do they make?

8.11.1. Let us now look at the actual figures involved, remembering that Highways England are saying in their reply that there is no need to take any action because the increase in numbers of vehicles is in their words "relatively low"

8.11.2. See Table below

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

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8.11.3. Data from ES App. 2.1, tabulated iirc by CPRE DW NOTE: there are many side roads in Glossop NOT included in this table as the data for them has not been collected or modelled, or published, whichever is the case.

8.11.4. To call an increase of 1000 vehicles per day on an existing flow of 6900, or an increase of 1400 on an existing flow of 3100 "relatively low" is – well, what is it? Choose your own adjective, and especially do this bearing in mind the implications of these increases (see next paragraph), and the nature of the roads we are talking about.

8.11.5. To argue that they effectively make no difference is absurd. People waiting to cross the road, children walking to school and their state of mind as they do so, and their freedom, or lack of it, to enjoy the walk with their friends, the parents or guardians of those children worrying about their safety, and possibly even driving them to school so that their safety can be guaranteed, the intimidation effect of the additional traffic on all those who might adopt or be thinking of

adopting active travel, the effect of the additional noise and pollution on people's physical and mental health, the potential impact on local shops and facilities, and the cumulative effect of all this on people's well-being; all this is of no concern to Highways England who declare that no mitigation is required.

8.11.6. And as if all that were not enough, HE themselves predict increased accidents along just 2 of these roads to the tune of between £.5 million and £1million in monetised costs, if the scheme were to be built *(source: HPBC LIR paragraph 7.33.*

8.11.7. It should be noted that this information also is nowhere to be found in the TAR. Itn does not feature in the Case for the Scheme either. In fact the CftS goes a step further. Referring to accidents, it states that on "residential roads" the scheme "is not expected to have an impact" . (paragraph 4.5.2). This is perilously close to lying, is it not?

8.12. 4..... can these impacts be ignored?

8.12.1. **HE's failure to look at these issues seriously, or to present any evidence to this Examination in Public** (I should emphasize that there is nothing whatsoever about these matters as they affect these minor roads in Glossop in the Transport Assessment Report, which is where these impacts should have been addressed,) **is not compliant with subsection 7 of section 104 of the Planning Act 2008, which states that the Secretary of State has to consider whether the adverse effects of the scheme outweigh its benefits.** (I have gone into this matter of the Planning Act in full detail in my Written Representation at Deadline 2 REP2-072)

Two more things need to be said.

8.13. 5.....the additional traffic and its associated impacts will be concentrated at certain times of day

8.13.1. Highways England give no consideration, in this case or elsewhere (for example when considering severance on the A57 and A628 as those two roads cross the moors) to the fact that the additional traffic will not be evenly spread throughout the day any more than the existing traffic is spread throughout the day.

8.13.2. It will quite likely be bunched, exactly like the existing traffic. It is, after all subject to the same underlying factors. I find it surprising that Highways England seem to have a problem with telling us about hourly flows. (I am sure they know what they are, as you cannot design a scheme and its junctions without knowing the degree of bunching. As we all know, there is much more traffic at peak times than at other times. **So *if you add the additional traffic* mostly at the *same times*, then you get a far larger and more significant effect, at peak times, on all the aspects which I mentioned above.**

8.14. 6.....the effect on accidents

8.14.1. As I pointed out in my deadline 5 submission, ((REP5-040, pages 17-20) accidents do not just happen, they have causes and the causes can be identified and addressed. **We now know**, although we did not know this from the utterly inadequate Transport Assessment Report, **that Highways England predict additional accidents on Shaw Lane and Dinting Road**. God bless the children who are going to be knocked over.

8.15. Conclusion of this section

8.15.1. In the light of what I say about the stipulations of the Planning Act in paragraph 4 of this section, I repeat: **there must be a proper assessment of the additional severance, safety, and other issues caused by the projected increase in traffic on minor roads in Glossop. Will you ask the applicant to carry out this assessment? (Request to the ExA)**

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9. TOPIC 7 – MORE ON THE MODEL, IN PARTICUALR THE STATUS OF THE DFT 2019 FIGURES

DW

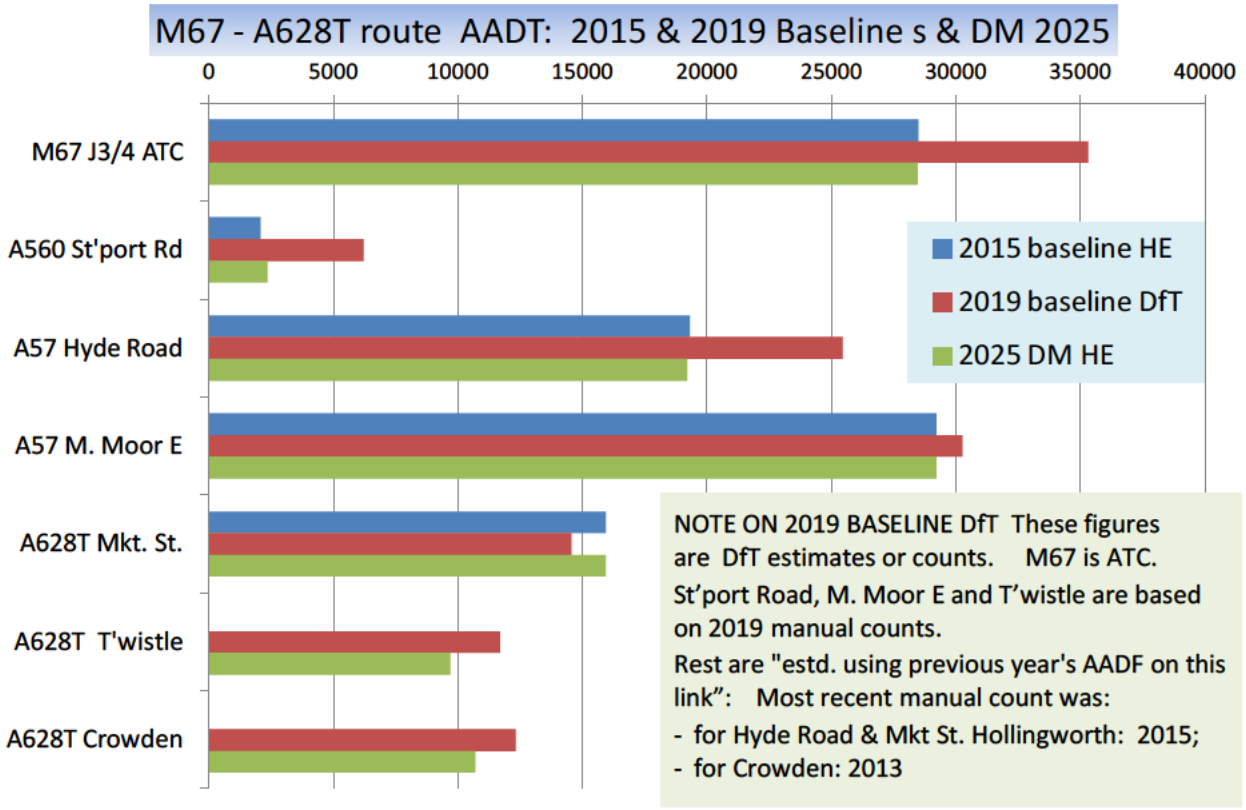
9.1. Be that as it may, there is something not quite right here. There are 2 versions of what is going to happen, and they both cannot be right. I am tempted to do some wondering about why this should be so. But it is enough to say to you that this inconsistency should not be allowed to stand and needs to be cleared up.

REPLY BY HE

9.2. It is acknowledged there is a difference in the Department for Transport (DfT) daily count data and the base year modelled flow. The DfT counts themselves are not used as part of the traffic model build in part because the "observed" traffic flows as stated by DfT are often extrapolated estimates from previous counts where they were not counted in that specific year. Separately commissioned traffic counts were used to develop the traffic model as part of the model calibration process. These are considered more representative than the DfT counts. It should be noted that modelled traffic flows are based on average hourly flows by time period (AM, PM and interpeak) rather than the daily flow, hence there is scope for greater differences to develop between modelled flows and the DfT count data when factored to a full day.

DW COMMENT ON REPLY

9.3. As I now have made clear in my presentation with bar charts of the predicted flows with or without the scheme (REP5-039), **the point at issue is principally the fact that HE's modelled flows on the M67 link for 2025 Do-Minimum are the same as their 2015 modelled flows, and this is simply not credible.** If we look at the bar chart below (slide 14),



we see that that the DfT figure for the M67 is far far higher than HE's modelled prediction for 2025. **And this DfT figure is based on a manual count.** This absolutely does not add up. There is something very wrong indeed here and I ask the ExA, once again, to order a peer review to be carried out into this and the many other discrepancies and implausibilities in the outputs of the model. **(Request to the ExA). See** (REP5-039) and (REP5-0409) for a complete account of these discrepancies and implausibilities.

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10. TOPIC 8 – THE BAMFORD ANOMALY

DW

10.1. Charlotte Farrell says (written submission, deadline 2 I believe, Para. 6): "National Highways has not provided any logical explanation or indeed any explanation for this assertion and in fact it contradicts its own evidence on road safety in the Transport Assessment. Figure 7.2.10 of the Transport Assessment summarises the impact of the scheme in terms of personal injury accidents. It shows that it expects there to be a negative effect on the A6013; and even on the A6187; which, based on their earlier statements in that chapter indicate that they expect there to be increased number of vehicles using the road."

HE REPLY

10.2. The village of Bamford is on the A6013 which connects the A57 Snake Road to the A6187 that runs parallel to the A57 to the south. Consequently, any changes in traffic flows on the A57 or

A6013 would not necessarily result in a change in flow on the A6013 through Bamford. The traffic modelling used to assess the Scheme indicates that the traffic flows on the A6013 through Bamford are forecast to marginally reduce in 2025 (by - 1%), but marginally increase in 2040 (by 1.6%) compared to without the Scheme. These forecast changes in flow are not considered to be significant. The evaluation of changes in the forecast number of accidents on the affected road network due to the Scheme covers 60 years. Consequently, the small forecast increase in traffic flows on the A6013 through Bamford from 2040 results in a correspondingly marginal increase in the forecast number of accidents on the A6013.

DW COMMENT ON REPLY

10.3. Figure 7.8 in the TAR tells us that accidents of a monetised cost of between £2million and 1.5million will occur on the A6013 through Bamford if the scheme is built. Or maybe the number is quite different as it is impossible to tell from the map shown on my screen, as HE have used colours which are illegible. If it is true as they say that traffic flows and accidents are directly correlated, then these increasing numbers of accidents on the road through the village of Bamford indicate an increase in traffic.

10.4. This in turn raises a legal issue since there has been no assessment of impacts of this scheme on what is a conservation area, and I believe that this is a legal requirement.

10.5. This still leaves the fact, not addressed by HE in their reply, that a drop in traffic through Bamford whilst the traffic increases by 38% on Snake Pass is implausible. Maybe there is an explanation, but HE have not said what it is.

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11. TOPIC 9 – WHY IS AN INCREASE IN TRAFFIC OF 38% IN THE PEAK PARK LABELLED A "SLIGHT INCREASE"

DW

11.1. How can we explain this? Well, PDNPA have also noticed this. At Paragraph 8.4.6 of their LIR, we read:

11.2. *"8.4.6 The percentage increase in flow on the A57 Snake Pass in 2025 with the scheme seems to be very large (37.7%) but the Environmental Statement (Table 7.32) only notes a 'slight increase' of traffic on the A57 (e.g. in relation to VP23) with no change to the Special Qualities of the National Park. We are concerned that the assessment of impact of increased traffic on the A57 is underestimated."*

11.3. So here we see repeated, by the PDNPA, this same concern – namely that the increase (meaning DS-DM) is 38% and yet the ES calls this a "slight increase" This makes me wonder if there are not 2 different figures in play here, that underlying this discrepancy lies an error of some kind. The alternative is that the ES is being disingenuous. In this case I prefer the former explanation (in the technical sense of – "I think it is more likely" – but please can the ExA find out what is going on here?

HE REPLY

11.4. Although the increase in traffic due to the Scheme on the A57 Snake Road/Pass is forecast to represent up to a 38% increase, the absolute increase in the number of additional vehicles is relatively small at approximately up to 1,450 vehicles per day, which is equivalent to approximately an average of 2 to 3 vehicles per minute in each direction. It is on this basis that the forecast increase in traffic on the A57 is not deemed to be significant in terms of perception because of the already high number of vehicles using the route.

DW COMMENT ON REPLY

11.5. Same comments as above, concerning the "relatively low" increases in traffic on the residential roads of Glossop. Namely, ***if you add the additional traffic*** **mostly at the** ***same times (as existing traffic)*****, then you get a far larger and more significant effect, at peak times,** whatever that effect might be. In the Peak Park, it will be everything from the removal of tranquillity to impacts on wildlife.

11.6. The "average of 2 to 3 vehicles per minute" will be something completely different at peak times. Of course peak times on Snake will not be the same as peak times in Glossop. They may well be 3.00pm on a Sunday afternoon.

11.7. HE also pull this trick of "small increase" with respect to Tintwistle – effectively saying: 'it is already so bad, that a little more won't hurt.' (I am sorry I cannot find the exact wording because the documents in the Examination library cannot be searched – and yes, I have pointed this out to your admin team. I think it was in a reply to PDNPA).

11.8. I also note that 4000 vehicles per day is now a "high" number. I look forward to seeing HE apply this new insight to other areas, such as Glossop. And what does that make the 10,000 or so on an average day on the A628 through Tintwistle? An intolerably high number perhaps?

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12. TOPIC 10 – IMPACT OF INCREASED TRAFFIC IN GLOSSOP AND ELSEWHERE ON BUS SERVICES

DW

Impact of this issue on bus services

12.1. Considering the impact of the scheme on local bus services brings home how important this issue of the generalised traffic burden on the area as a whole is (not to mention the whole issue of traffic nuisances). HE writes this in reply to question 3.14 about the impact of the scheme on bus journey times: (another screenshot, copying not possible)

12.2. Firstly, Figure 3.5 on page 28 of the TAR shows bus routes in the area – the associated text gives more details.

12.3. Secondly, HE says in this reply that no study has been undertaken and yet the TAR says at Para. 3.4.11 also on page 28: *"It is expected that bus services running through the study area will benefit from improved journey times and reduced congestion"*

12.4. Thirdly, putting the above two statements together reveal that there is no basis for HE's claim beyond them asserting it to be so. And yet the means exist for all participants in this EiP including, indirectly the public in its widest sense, to get a clear picture of these issues (subject to any questioning of the correctness of the predictions as a whole),

12.5. This is so important. Please can you, the ExA ask HE to publish a series of clear maps showing the traffic flows which they are predicting with and without the scheme, throughout the area, in the opening and design years, and also with the "current" flows, so that we all know what assertions about pollution, severance, and bus services sticking to time, are reasonable and which are not???

HE REPLY

12.6. The traffic modelling enables National Highways to predict that the journey times and service reliability for some bus services will improve with the Scheme because of the reduction in traffic congestion and delay on A57 through Mottram in Longdendale, whilst for other bus services there may be a deterioration in journey times and service reliability due to increased traffic flows on some roads due to the Scheme, e.g. in Glossop.

12.7. Bus services have not been modelled separately because bus services in the area are relatively infrequent and changes to bus journey times are capable of being estimated from the traffic modelling. As bus services are relatively infrequent, bus passenger numbers are very small in comparison to the overall number of vehicles using the affected road network. Consequently, the effects of changes in bus journey times do not materially alter the assessment of the benefits of the Scheme.

DW COMMENT ON REPLY

12.8. HE write in their reply here: *"for other bus services there may be a deterioration in journey times and service reliability due to increased traffic flows on some roads due to the Scheme, e.g. in Glossop."*

12.9. The TAR says at Para. 3.4.11: *"It is expected that bus services running through the study area will benefit from improved journey times and reduced congestion"*

12.10. It appears that statements made in the TAR, which has been prepared by HE for this Examination, are not worth the paper they are written on. I am being frank, and wait with interest to hear from HE as to how these two statements can be reconciled.

12.11. And there is the dazzling throwaway line showing that HE are not living in 2022. There are not that many passengers because there are not that many bus services. And so the negative impact of the scheme on bus journey times does not make a lot of difference to the VfM of our scheme. Which is the very scheme which is elbowing out the elephant in the room which is a modern, climate-compatible transport solution for the area.

13. TOPIC 11 – ACCIDENT RATES AND TRAFFIC FLOWS RECAP

DW

13.1. TRAFFIC DATA - DATA NON GRATA – THE GLOSSOP QUESTION – (see screenshot on page 12 of original submission)

13.2. HPBC and DCC both put in a holding objection because of inadequate information, which did not allow them to understand the scheme and its impacts. Accident levels seem to show that taken as a whole the network has more traffic, as this extract from the BBA documents shows, page 50, Para. 5.4.3

"5.4.3 A more detailed analysis of impacts across the network shows that the A57 Snake Pass, which is known to have a high accident rate, is forecast to experience an increase of more than 160 accidents. This alone exceeds the total impact across the rest of the network combined. Small increases in accidents are also expected through Glossop and along the A628. The scheme does not make any of these roads intrinsically less safe but increases traffic flow, leading to a higher potential for accidents to occur. Flow is reduced elsewhere on the network, such as along the M62, but motorways are safer than other road types and so the net impact of the combined rerouting is negative." (my emphasis).

13.3. My comment: if the "total vehicle kilometres" was genuinely the same with and without the scheme, then according to the technical people the accident level would also remain the same.

HE REPLY

13.4. The accident risk varies by type of road, so if the distribution of traffic changes across a road network it does not mean that the overall accident risk remains the same even if the total vehicle kilometres remain unchanged. This is because the proportion of traffic using different types of roads with either higher or lower accident risk levels may change. The forecast increase in accidents due to the Scheme over 60 years represents only a 0.3% increase overall across the affected road network compared to the Do-minimum scenario, which is considered marginal. To some degree this reflects the fact that the Scheme is not forecast to result in an overall increase in total vehicle kilometres.

DW COMMENT ON REPLY

13.5. I can see that the new road, with its vastly better safety profile, will add to the number of relatively "safe" vehicle kilometres and thus serve to have a downward effect on accident rates. That does NOT mean that accident rates will necessarily be lower overall, in fact they are not. However, that is no reason for HE to try once again to make us think that total traffic in the area will be the same with the scheme as without. It won't. Their technical Papers tell us so: as I cite in my original statement here: *"The scheme does not make any of these roads intrinsically less safe* ***but increases traffic flow****,"* (BBA paragraph 5.4.3, my emphasis)

13.6. Traffic on the M67, if the scheme is built, according to their own model, is predicted to increase substantially, by 7500 vehicles per day. See the first chart in this document. This traffic has to go, or come from, somewhere, which means that there will be more traffic in the area. Unless

there is a giant car park under the roundabout at the Eastern end of the M67 where all these trips begin and end. ☺

13.7. The scheme DOES increase traffic in the area – at least if we accept what Highways England's model is telling us. [3]. So why do they repeat this phrase about total kilometres which makes us think that it doesn't?

13.8. And thirdly, if there is an increase in traffic in the area whether or not the scheme is built, due to forecast traffic growth, as Highways England say in the last sentence of their reply, then why is this increase airbrushed out of this Examination in Public, as that increase itself will lead to an increase in total kilometres and therefore in accidents?

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14. TOPIC 12 – SCREENING OUT DECISIONS AND THE NEED FOR COMPARISONS WITH THE BASELINE

DW

TRAFFIC DATA - SCOPING OUT DUE TO TRAFFIC "INCREASE NOT BEING GREAT ENOUGH"

14.1. I put it to you, the ExA, that this is simply not satisfactory. I think I know what the answer of HE would be if you were to ask them the question, namely whether my suggestion would not give a more accurate picture, to the public – meaning everyone – and would not better guide the decision as to whether an assessment is necessary for x, y, or z. I think they would say that they are following their guidelines, in this case, I believe that is in the DMRB (but I may have gathered that wrongly, and maybe it is enshrined in more than one guidance document). To which I would reply that in that case there is a problem with the guidance, and I can only plead with you, the ExA to deal with that fact appropriately. To sum up, the guidance is designed in such a way that the public is badly informed, and even one could argue, misled and that is unsatisfactory, and non-compliant with principles of good governance, such as Nolan. Please will you ask the question above, or preferable by far, simply instruct HE to place before this examination the requisite comparisons, in chart, and in map form.

HE REPLY

14.2. Screening out small changes in traffic flows from an impact assessment is industry standard best practice.

14.3. The purpose of the assessment is to establish the impacts and consequential effects of the Scheme and isolate these from the impacts due to forecast traffic growth that would happen without the Scheme in any event. This is achieved by comparing the Do-something with the Do-minimum

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[3] Which I do not, see Library REP5-039, (presentation in power-point form with bar charts, showing the predicted traffic flows around the network), and Library REP5-040, where I explain this presentation in detail. For a shortcut to the essential points, see pages 4 and 5: section headed "OVERVIEW - KEY MESSAGES FROM THE CHARTS" - but presumably Highways England do . . .

scenario. The purpose of the assessment isn't to assess the impacts and consequential effects due to forecast traffic growth that is forecast to happen with or without the Scheme, i.e. comparing either the Do-something or Do-minimum scenarios with the baseline.

DW COMMENT ON REPLY

14.4. HE's reply is fine as far as it goes, and in fact is very plausible, But buried within it is a massive methodological flaw. If we do not remedy this flaw then the whole EiP risks barking up the wrong tree and coming up with the wrong answer.

14.5. HE have not included what "my suggestion" in line 2 above actually was, in the original document to which they are replying (REP3-032). I will remedy this, so that readers can understand the important principle which is at stake here.

14.6. My suggestion was that **future predicted traffic flows and their impacts should be compared not only to other future flows (as in comparing DS and DM) but also to actual flows as they are now**, which is what the person in the street actually experiences on a day to day basis. The rationale for this I gave as follows:

14.7. What they (HE) do <u>not</u> do is compare the DS figures (or indeed the DM figures) with the BASELINE. If they were to do this then the increase in impacts would look worse, or even far worse. We do not know what the true increase is and therefore cannot accurately assess the potential increase in the negative impacts.

14.8. The scheme's proposers first ASSUME a given level of traffic growth. This is no doubt (though I would not know as I was not given this information when I requested it) included in the traffic model and predictions. But then it is "disappeared" from consideration, and we just get, all the time, DS vs. DM, thus obscuring the issue of the background growth, which is <u>itself</u> problematic,

14.9. The underlying growth in traffic is rendered invisible, and not present to the mind of the reader. This blind spot runs right through the examination, or rather through the presentation of the figures by HE.

14.10. And, I would add, not only does this omission of consideration of the baseline reduce the amount of adverse effects which we are talking about, it also makes traffic growth look *inevitable*, rather than something which is in fact *highly malleable* and could be lowered by effective local measures, as the government is now calling for.

14.11. Again, I would insist that according to the Planning Act 2008, the ExA is tasked with comparing adverse effects of the scheme against benefits. Once you are using that frame of reference, can you in all conscience recommend the scheme, if an alternative package actually delivers a far better benefits to adverse effects ratio than the scheme?

15. TOPIC 13 - THE DOCUMENTS OF BBA RELEASED BY CPRE TO THE EXAMINATION

DW

15.1. THEME 2 –THE DOCUMENTS OF BBA RELEASED BY CPRE TO THE EXAMINATION

15.2. My observations on this bundle of documents will be under the following headings:

15.2.1. A single track methodology

15.2.2. The uncertainties list

15.2.3. Climate change

15.2.4. The policy environment

15.2.5. BCR's

15.2.6. Switch of consultants

A few preliminary remarks

15.3. Firstly, a word of gratitude is due to CPRE for submitting these documents to the examination. And secondly, I do think that a word of reproach and puzzlement should go to Highways England for not submitting this documentation for scrutiny at this examination or as soon as it was prepared. I note from the document themselves that the economic appraisal package is dated 26//07/2021 and two of the other documents are dated 12 / 11 / 2021 and that one document is undated. I must say that I have to assume that the vast majority of this work was done well before November.

HE REPLY

15.4. It is not normally appropriate to release partial information into the public domain in advance of the full package of information being submitted with the Development Consent Order application. This is because partial information would potentially be misleading or misunderstood in the absence of all the supporting information for the Scheme that enables full comprehension of all aspects of the Scheme assessment in combination.

DW COMMENT ON REPLY

effect on scrutiny

15.5. By not releasing the technical documentation in a timely fashion, HE made it far more difficult, if not impossible for other stakeholders to peer review, or to arrange for peer review of the modelling. They put *everyone else* under time pressure. If it is some sort of “standard practice” to withhold information of this type then maybe standard practice needs to change.

15.6. The suggestion that issuing 790 pages of technical support documentation for the modelling could “potentially be misleading or misunderstood” is laughable, particularly when that documentation is being sought by a professional transport planner with years of experience or by a County Council.

HE as the purveyors of full and complete information

15.7. Well, I never. Here we see that HE's goal is to "[enable] full comprehension of all aspects of the Scheme assessment in combination." This from the authors of a TAR which is so bad as to be unacceptable.

15.8. On Accidents, Alternatives, Buses, Climate change, Glossop, HGV's, Journey times, Reliability, Severance and Trains necessary information is simply missing, the presentation of what is included is highly selective, and assessment is conspicuous by its absence. How such a document can be presented to an EiP I do not understand.

15.9. I will not go into the detail of this document here, it is all to be found in my detailed 17 page critique in my Deadline 5 submission: Library REP5-040, pages 16-33.