

A57 LINK ROADS TR010034

**Response to
REP6-033 - NATIONAL HIGHWAYS' RESPONSE TO REP4-031**

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for**

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Unique Reference: 20029243**

DEADLINE 7 - 23rd March 2022

There are several issues which we wish to address in NH's response to our REP4-031.

1 Page 4: Calculation of the carbon cost between the Scheme and Business as Usual forecast and an alternative package without the scheme with a consequent lower level of traffic.

NH say this approach to carbon does not meet guidance for road schemes. Specifically NH appear to be saying that the same number of trips should be used between runs.

What is missing here is any awareness that comparisons between programmes with and without road schemes and with different levels of traffic have already to be subject to appraisal. If they weren't, appraisal of schemes for example containing road pricing (where traffic demand changes significantly) would be impossible. There are techniques for doing this but perhaps the most important comparison should be a positive one. The package of alternatives should be appraised with its lower level of traffic. The road scheme can also be appraised with its higher level of traffic. The results can then be compared, in particular for carbon emissions. It should be noted that NH do not say that the difference between these scenarios would not be real, only that it doesn't conform to the guidance they have chosen.

This is not a simple, middle of nowhere road scheme. It is physically almost entirely within the Greater Manchester area and most of its traffic appears to be related to that area (see comment on Page 13 below).

2 Page 8: Use of the carbon worksheet.

NH are correct that I called the greenhouse gas worksheet the carbon cost toolkit. However they do not challenge the actual figures, only the use of different levels of traffic. Indeed it would be surprising if they did challenge them because the GHG worksheet uses the latest carbon cost figures at the correct discounted rate. We also gave reasons for the 2050 cut off (i.e. net zero should be achieved by then). Without it the figure for carbon costs would have been even higher.

We maintain that our estimate of the difference in carbon cost between a realistic sustainable package and the scheme as presented to the Examination is the best available using the data supplied.

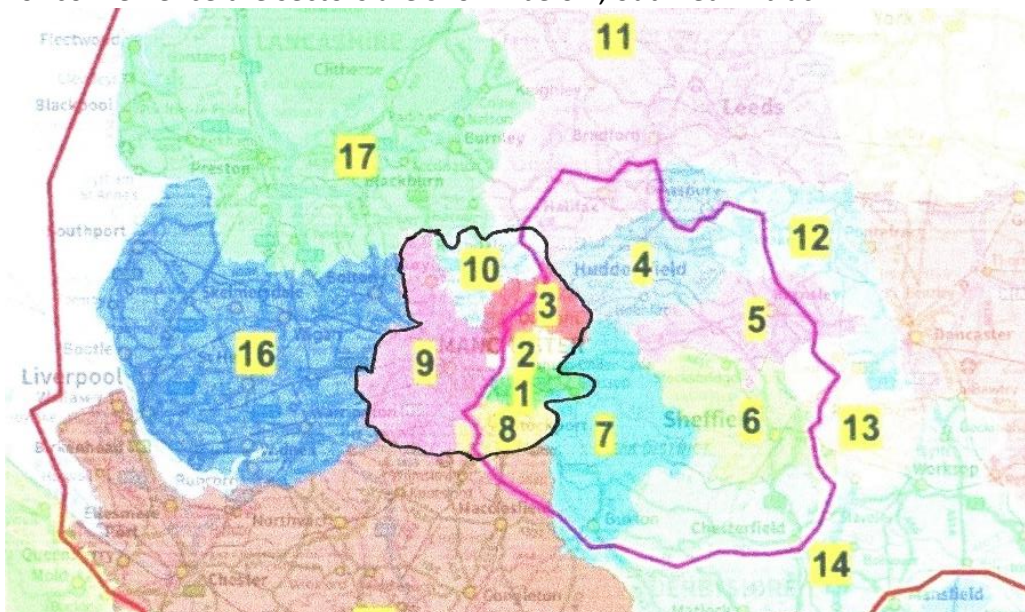
3 Page 13: The scheme is within a major conurbation.

NH say that “the Scheme is not located in the vicinity of a group of towns and villages that are currently as well served by public transport as larger towns and cities”.

In reality the Scheme is almost entirely within a Metropolitan Borough within Greater Manchester. Looking west from Mottram the Scheme connects to an urban area and most of the traffic in the Area of Detailed Modelling is, as far as the supplied data shows, related to that area.

For example, for 24 hour Home Based Business and Commute trips originating from the study area (Sector 1) **84%** are related to the sectors within Greater Manchester (Sectors 1,2,3,8,9,10). The argument that the study area is “not located in the vicinity” of Greater Manchester does not hold true merely by observation, the traffic data entirely backs this up.

For convenience the sectors are shown below, outlined in black.



4 Page 15/16: Benchmarking the significance of the carbon emissions

NH do not appear to directly address the issues raised in the rather convoluted quote from IEMA guidance which applies to something else rather than assessing significance. The two sentences following the quote are extremely hard to understand and don't seem to respond to the points made. Their final remark is that they “cannot comment on the robustness of the calculations”. We would like to reassure NH that they have been prepared to the highest standards within the limits of the available data. We would be happy to go through these calculations and any others in detail with NH and their consultants.