

**A57 LINK ROADS TR010034**

**GENERAL ORAL SUBMISSION GIVEN TO ISH3, DAY 2, 6<sup>TH</sup> APRIL 2022**

**by Keith Buchan, MTRU**

**for**

**CPRE Peak District and South Yorkshire**

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**DEADLINE 8 – 13 April 2022**

During the hearings there was a great deal of detailed discussion, down to the level of detail of types of planting. However there remain some major issues of substance for the DCO and we wanted to draw these out from the hearings themselves. There seem to be three key issues which emerged from the hearings:

- 1) whether the scheme is compatible with national and local Government policies to promote sustainable travel in towns and cities
- 2) whether the scheme is compatible with national and local policies to reduce carbon
- 3) whether alternative schemes are possible which would be compatible with those policies and would offer significant benefits to all travellers not just those using cars.

The issue of compatibility has been tested in part following the release of information on where the traffic affected by the scheme comes from and goes to. This was not apparent in the original submissions and therefore to other parties, including the local authorities and the National Park. There has been no challenge to date of the analysis we have undertaken of the material extracted from NH. The rebuttal seems to be, as far as we can see, that guidance has been followed, that further work is not required by NH, and the material is not considered relevant because the strategic level analysis was undertaken in 2015.

From the material we have obtained after the main documents were submitted we can state the following:

*Failure to update and reflect relevant guidance*

- 1 No further Strategic level assessment has been undertaken since 2015, despite the radical changes in Government policy, the legal status of the Climate Change Committee sixth budget, and the Green Book advice that it should be checked at each stage of the Business Case process
- 2 The Uncertainty Log does not include a range of elements which are recommended by DfT guidance, in particular those relating to the forecasts; guidance in the DfT Uncertainty Toolkit has not been used
- 3 A Business As Usual forecast has been used for the modelling and appraisal – this no longer reflects the reality of a net zero pathway for transport

*The importance of Greater Manchester's omission from the modelling and appraisal<sup>1</sup>*

- 4 A majority of the trips in the area affected by the scheme (i.e. in the model trip matrices as supplied) are related to Greater Manchester (84% of commute and home based business) -

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<sup>1</sup> See REP7-035 para 3 for full details and diagram.

- 5 A majority of the benefits to drivers, presented to the DCO, are received by journeys related to Greater Manchester, 60% for trips within the conurbation, 66% if trips to and from adjacent areas such as High Peak, Kirklees and Sheffield are also included
- 6 However, the modelling of travel in Greater Manchester has no additional zones or road links added, and has largely used a fixed cost function and masking to limit traffic changes which would otherwise have occurred

*Omission of walking, cycling and public transport from the modelling and appraisal*

- 7 Only a small amount of public transport use is included in the model, rail trips for which a car may be available, and appears to be modelled at a coarse regional level (NH have been emailed to clarify this). This was not disclosed by NH until the April 5<sup>th</sup> ISH despite constant reference to public transport as a whole in our emails and technical meetings
- 8 There is no explicit modelling of walking or cycling in the model
- 9 There is no account of the time or safety disbenefits of the proposed “walk with traffic” crossings of the new road layouts to pedestrians and cyclists – for example there will be no all red phase for them to cross the main part of the scheme at Mottram
- 10 There is no traffic calming/road crossing/public realm strategy for either the existing or the new route

*Omission of HGV analysis despite its major contribution to congestion and pollution*

- 11 Most of the HGV traffic through Longdendale is through traffic and is at the heaviest end of the weight spectrum (large articulated). NH do not have data allowing CPRE to fully analyse the mode switch which would be encouraged by our proposed HGV through traffic control, although accidents in the National Park would be reduced

*Failure to assess the carbon impacts of the scheme*

- 12 The carbon assessment seems to have changed significantly (using EFT v.11) but there is virtually no information about how that has been calculated or the status of the original assessment which used outdated carbon costs
- 13 There may have been a sustainable scenario tested, as we have called for, but we have no idea of its results or how it was constructed, in particular whether it contains the lower traffic forecasts implicit in the Transport Decarbonisation Plan (TDP)
- 14 The guidance in IEMA called in aid by NH has been misunderstood – it supports the argument that not reducing carbon, especially in the next few years, is a significant adverse impact.

In view of this we have undertaken further work:

- 1 To engage with NH on technical issues: this has proved extremely difficult since NH have not allowed direct contact with their technical consultants who are undertaking the forecasting and modelling work
- 2 To show that a sustainable package approach is possible including an HGV restriction (refined from 2015), the dispersal of the Mottram queue through linked traffic signals, additional crossings, bus priority and signalling existing junctions, new cycle and walking routes and public realm improvements to encourage footfall
- 3 Using standard DfT methods to show that at least the walking and cycling parts of such a package would be strong value for money (high BCRs) and outperform the scheme

- 4 To extract information from the model to assess the HGV restriction and the public transport proposals but sufficient data has not been supplied and it seems likely is beyond the scope of the model used by the Applicant
- 5 To engage with the public and local authorities on alternatives through a web based consultation, emails and an open meeting with professional facilitation, and submitting the results to the DCO
- 6 To analyse the data as it has been supplied in order to better understand the forecasting and modelling and reach the conclusions above. This was not possible at the time of the Applicant's submission due to the limited information and thus was not available to other DCO participants including statutory bodies.

The additional work and the information leads us to the conclusion that the proposed scheme:

- 1 Increases and maintains carbon emissions when policy and legal requirements are to reduce them
- 2 Has been assessed using traffic forecasts which are incompatible with local and national Government policies and programmes
- 3 Has failed to follow guidance in the Green Book on the Strategic Case and alternatives and on the Uncertainty Log for forecasting
- 4 Is lower value for money when new carbon values are applied: the Applicant appears to still be using the old values for rebuttals
- 5 Would be worse value for money if the traffic forecasts were lower: a "low growth" forecast has been undertaken but no forecasts have been used for the Economic Case which are compatible with the Transport Decarbonisation Plan
- 6 Creates major severance for pedestrians and cyclists, particularly South of Mottram where the new junction has no single movement crossings ("all red")
- 7 Offers significant encouragement to substantial numbers of car journeys in areas which are the specific target for switching to sustainable travel in Government and TfGM policies and programmes

We also conclude that a package of measures, providing less traffic relief at Mottram, but benefits instead of disbenefits across the whole area, would also be compatible with local and national policies and programmes. While there is not sufficient data to cover the whole package, the walking and cycling elements are likely to be far better value for money using the DfT toolkit.

For these reasons and the detailed evidence we have provided to the DCO we recommend that the scheme is refused permission.

We will ask the Examination Panel to consider the issues raised by the extremely late disclosure of the facts about the extent to which public transport is omitted from the modelling in a separate written submission.