

Reference	DW Deadline 5 comments	National Highways Response	DW Deadline 9 response
9.69.114	<p>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.</p> <p><b>The HE-modelled 2025-DM figure for the M67 J3 / J4 is almost certainly incorrect.</b> 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 than the 2019 DfT ATC figure. This is so implausible that it is almost certainly untrue.</p> <p><b>All the other 2025-DM figures are therefore almost certainly incorrect also,</b> since they have to be consistent with the M67 2025-DM figure, as this is the main route into and out of the area.</p> <p><b>Comparisons between 2025-DS and 2025-DM are then in turn also invalidated,</b> because what is effectively the baseline, namely 2025-DM, is suspect. And if the baseline is suspect then the model itself is suspect.</p> <p>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 &gt;1000.’ So <b>all these automatic scoping out or screening out decisions are also no longer valid.</b></p> <p>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 . . .</p>	<p>The baseline traffic model on which all the traffic modelling for the Scheme is based, is built from matrices of the current traffic demand between origins and destinations by areas or zones across the modelled area. This traffic demand is then assigned to the road network based on the model parameters, such as highway capacity, journey time and cost, junction delay etc. The traffic model is then calibrated against recorded traffic flows on links that cross defined screen lines by refining the model parameters so that the modelled traffic flows match observed traffic flows within predefined acceptable margins of error. This is done to ensure that the baseline traffic model provides an accurate representation of the current traffic flows and the operation of the road network and can, thereby, be used as the foundation for developing the forecast year traffic models.</p> <p>The baseline traffic model is calibrated against a combination of traffic flow data recorded by specifically commissioned traffic surveys and by fixed automatic traffic counters (induction loops) located across the Strategic Road Network (SRN). Traffic flows recorded by the automatic traffic counters on the SRN (Webtris data) are collected by National Highways on an ongoing basis and, therefore, provide traffic flow data over an extended period of time. These are separate to the traffic counts undertaken by the Department of Transport (DfT) that use a mixture of automatic traffic counters and manual traffic counters and are only undertaken once a year, at most, over short periods of time (typically 7am to 7pm over at most a few days) and factored up to provide an estimated annual average daily flow (AADT). The Webtris data collected by National Highways, therefore, provides a much more accurate and reliable record of current traffic flows than the DfT spot counts. The baseline traffic model has been calibrated against the Webtris data, including that recorded on the M67 which provides the most reliable and accurate traffic flow data to calibrate the model against in this location.</p> <p>The traffic modelling is also based on peak morning, inter-peak and evening peak periods, and has been calibrated against recorded traffic flows for these periods, not daily flows. The daily traffic flows used in the assessment of the Scheme are derived by factoring up these peak period flows. This factoring will also introduce discrepancies in any comparison with the DfT count point data.</p> <p>Furthermore, the method used for the DfT count point on the M67 switched from manual counts to automatic counts in 2017 and the recorded traffic flows have risen since this switch, particularly for HGV movements, which seemingly increase by 24%. It is likely that the method of traffic recording itself may in part be responsible for this increase, as the two counting methods have different levels of accuracy, especially regarding vehicle classification.</p> <p>For the reasons stated above it is not appropriate to compare modelled traffic flows with DfT traffic counts and, consequently, the assertion that</p>	<p>First of all, thanks to HE/NH for engaging with these issues.</p> <p>About the first paragraph, this is a clear explanation of how the Baseline model is created. Three points:</p> <ol style="list-style-type: none"> <li>1 Why was I not told this in November 2020 when I first asked for this information? I suppose this now counts as ancient history but it points to one of my main concerns at this examination which is the approach and attitude of HE/NH as an agency of government.</li> <li>2 I note that the model is calibrated so that the outputs match what is actually happening on the ground by effectively making tweaks to the model parameters. In other words the model parameters are not set in stone but vary according to local circumstances. This is highly relevant when HE/NH are trying to tell us what they expect to happen at the Shaw Lane junction</li> <li>3 Having done these tweaks the outputs then match reality on the ground at the points where this is checked by the modellers. I wonder if this explains the anomalies which I and others have pointed out at Market Street (the Mottram Market Street not the Hollingworth Market Street) and in Glossop High Street East, two places where traffic magically disappears down a MMMC (Magic Mystery Manhole Cover).</li> </ol> <p>In other words, the tweaks do their job of lining up the outputs of the model with observed reality, but taken together in a different context at another part of the network, the tweaks combined produce silly results.</p> <p>About paragraphs 2,3, and 4. Here HE/NH tell us why they think their data is so much more reliable than the DfT data. Three points:</p> <ol style="list-style-type: none"> <li>1 HE/NH appear to be arguing that because the DfT counts include an error about vehicle classification the counts themselves are invalid. This does not follow.</li> </ol> <p>In addition, HE/NH sow confusion over the DfT counts. In paragraph 2 they compare their Automatic Traffic Counters (ATC’s) which “work on an ongoing basis” with the DfT’s counts which they describe as working as follows “[they] use a mixture of automatic traffic counters and manual traffic counters and are only undertaken once a year, at most, over</p>

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		<p>the traffic modelling is incorrect based on this comparison is not valid.</p>	<p>short periods of time (typically 7am to 7pm over at most a few days) and factored up to provide an estimated annual average daily flow (AADT). The Webtris data collected by National Highways, therefore, provides a much more accurate and reliable record of current traffic flows than the DfT spot counts.”</p> <p>Note the suggestion here made by HE/NH that the DfT counts on the M67 are “spot counts”. This not how I imagine ATC’s to work. Are HE/NH claiming here that the DfT instal ATC’s one day and take them away the next? Or do they stay there for a week? Or are they installed intermittently? Such details are necessary if we are to accept HE/NH implicit claim that the DFT counts can be ignored at this examination.</p> <p>The ExA and stakeholders must remember that a lot is riding on HE/NH’s claim that the DFT counts, which show traffic levels far higher than HE/NH 2015 and 2025-DM, are so inaccurate as to be irrelevant.</p> <p>2 HE/NH refer their readers to the Webtris data which they collect. However they provide no helpful link to guide the inquisitive reader who wishes to scrutinise what they say. I went a-googling to find this data and gave up after 15 minutes and I am an experienced researcher.</p> <p>3 HE/NH write, in para. 3: “The daily traffic flows used in the assessment of the Scheme are derived by factoring up <b>these peak period flows.</b>” I assume this is a typo, as it makes no sense. It should read “<b>the flows at these different periods</b>”</p>
9.69.115	<p>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.</p> <p>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&amp;15; 18&amp;19)</p> <p>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&amp;25)</p>	<p>The traffic flows on the A57 Glossop High Street East and A628 Market Street are higher than the traffic flows on the sections of these roads through the Peak District National Park (PDNP) because of the additional traffic demand generated within the urban areas of Glossop, Hollingworth, Tintwistle and Hadfield. This additional traffic demand is predominantly for journeys to and from destinations to the west, rather than across the PDNP and, therefore, results in significantly high flows on these sections of road compared to the sections of road through the PDNP.</p>	<p>Well well! We inch nearer to the truth.</p> <p>Nearer but not quite all the way there.</p> <p>Three points:</p> <p>1 A628 Market Street. Here the flows are consistently higher than in Tintwistle. Here are the details:</p> <p>“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 &amp; 18”)</p> <p>source: REP5-040 referring to REP5-039</p> <p>In the words of Bob Dylan “And you know something is</p>

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			<p>happening but you don't know what it is"</p> <p>But now HE/NH have spilt the beans at last. The large gap in flows between Hollingworth and Tintwistle is now explained by them as traffic arising in Glossop and Hadfield. (HE/NH also mention Hollingworth and Tintwistle as sources for these large gaps in flow, but these settlements are too small to generate the numbers in question.)</p> <p>2 National highways write: "This additional traffic demand is predominantly for journeys to and from destinations to the west."</p> <p>So it now appears that far from being a road designed to make a difference to journeys between Manchester and Sheffield what the road <i>actually</i> does is promote journeys by road from Hadfield and Glossop westward towards Manchester. This is hard if not impossible to reconcile with government policies designed to reduce traffic and encourage public transport and active travel in urban areas especially as the area is well served by rail.</p> <p>3 the explanation given by National Highways for the huge flows predicted by the model in Glossop High Street East (15,600 in 2025-DS) is a complete nonsense. They just cannot be due to motorists from Hadfield and Glossop seeking to go westwards towards Manchester as a glance at the map would show NH. <i>Some</i> can, but not at this scale. So these flows remain unexplained.</p>
9.69.116	<p>... 1 The DM-2025 flow predicted for the M67 J 3 / 4 location cannot be correct.</p> <p>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?</p> <p>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. <sup>1</sup></p> <p>But I needn't have bothered. Having done all this</p>	See response to 9.69.114 above.	See my reply to that response

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	<p>research I went back and had another look at the relevant bar chart (<i>slide 14</i>). The answer was right there staring me in the face. <sup>2</sup> 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.</p> <p>And so the conclusion stands. It is utterly implausible that DM-2025 should be the same as HE2015, and therefore it is virtually certain <sup>3</sup> that the DM figure is wrong.</p>		
9.69.11 7	<p><b>The anomalies.</b></p> <p>The two anomalies – items 6 &amp; 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.</p> <p>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 &amp; 18)</p> <p>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?</p> <p>Response 4: See response 2 above.</p>	See response to 9.69.115 above.	See my reply to that response
9.69.11 8	<p><b>Snake Pass</b></p> <p>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 &amp; 28) There are no obvious origins or destinations for the approximately 11,500 missing vehicles.</p> <p>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. <sup>4</sup> Note that an MMMC is a Massive Magic Manhole Cover.</p>	See response to 9.69.115 above.	See my reply to that response

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	Here are tables of these figures for the two locations:		
9.69.119	<p><b>The rat runs or “alternative routes.”</b></p> <p>The charts (slides 24&amp;25; 28&amp;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</p> <p>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.</p> <p>the rat runs were unknown to the public at consultation stage</p> <p>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.</p> <p>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.</p> <p>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?</p> <p>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</p>	<p>Additional information on the changes in traffic flow on Dinting Road and Shaw Lane due to the Scheme has not been withheld and has been provided by National Highways during the DCO Examination as soon as requested. See National Highways’ comments RR-0240-15 and RR-0751-1 on Relevant Representations (REP1-042). The increase in traffic flows on Dinting Road and Shaw Lane due to the Scheme are due to additional traffic demand routing along these roads to avoid traffic congestion and delay on the A57 Glossop High Street.</p>	<p>Three points</p> <ol style="list-style-type: none"> <li>1 The ExA and other readers should note that HE/NH do not respond to my point that they failed to inform the public of the increases in traffic on Shaw Lane and Dinting Road and other distributor roads in Glossop as well which were built into their plans for the A57 Link Roads, and that therefore the consultation in 2020 was built on false foundations. I am in the process of asking the ExA to remedy this shocking state of affairs. <i>Zzz PI Act??</i></li> <li>2 The applicant says that the increase in traffic on Shaw Lane and Dinting Road is due to motorists avoiding delay and congestion on the A57 from Brookfield towards Glossop High Street. What they do <i>not</i> say is that this problem of rat running is, according to the Applicant, due to be increased by around 25% because of this scheme (4600 more vpd at Brookfield Road, see REP5-039, slide 31)</li> <li>3 there was much discussion at ISH3 of how to handle the very difficult problems at Shaw Lane junction with the A57, problems which will be exacerbated by this scheme. The choice is between one bad solution and another. So sad when a sensible transport solution for the area would replace bad solutions with good ones.</li> </ol>

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	<p>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.</p>		
9.69.120	<p>Pg.18 1. Accidents Baseline</p> <p>Scope of TAR’s “study”</p> <p>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).</p> <p>In paragraph 3.7.4 we read:</p> <p>“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”.</p> <p>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</p> <p>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.</p> <p>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:</p> <p>“ROAD SAFETY AND COLLISIONS</p> <p>accident rates</p> <p>"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 /</p>	<p>The forecast impact of the Scheme on accidents doesn’t just consider the roads shown in Figure 3.8 of the Transport Assessment Report (TAR) (APP-185). The forecast impact of the Scheme on accidents considers potential changes in accident rates on all roads within the area of detailed traffic modelling, which includes all roads that could be used to a lesser or greater degree for through trips and, therefore, potentially subject to changes in traffic flows due to the Scheme. Minor roads that are not considered to accommodate through traffic, many of which are likely to be residential streets, are excluded from the traffic model and are therefore also excluded from the accident analysis. This is on the basis that they will not be subject to changes in traffic flows or accident rates, due to the Scheme.</p>	<p>The Applicant makes the distinction between minor roads where through traffic does not go and which are excluded from the traffic model and other roads which are distributor roads and can be used for through trips and therefore may experience changes in traffic flows. This distinction is perfectly valid. Then the applicant says that they have forecast the impact of the scheme on accidents on all roads where traffic changes might occur. This is also perfectly fine, so far as it goes. (I have concerns over how accidents and accident analysis are dealt with, but that is not the point here)</p> <p>Once again the problem is that the information about these accidents WAS WITHHELD.</p> <p>The TAR does <i>not</i> give a full account of accidents on these distributor roads. The TAR says “<i>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.</i>”</p> <p>The TAR is misleading here, when it says that on “residential roads” “<i>the scheme is not expected to have an impact.</i>” Figure 3.8 clearly shows the roads considered by the TAR and these EXCLUDE roads such as Shaw Lane, Cemetery Road etc, which we know, and which they knew, would have more traffic as a result of the scheme, and of which they KNEW that at least <i>one of these roads was predicted to have more accidents.</i></p> <p>By using the phrase “omit residential roads” and by not including most of the local distributor roads on figure 3.8 of roads included in their analysis, they are stating that, for them, these are not “residential roads.”</p> <p>This is deception, pure and simple. What does the applicant have to say?</p> <p>A subsidiary question is: Why does it take professionals who wrote the HPBC LIR to sleuth out these basic facts (they are to be found in the background technical papers) when they should be open to all in the TAR? What on earth is the TAR for?</p> <p>And another question, given the deception above, is: what about accidents on <i>other</i> distributor roads?</p>

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	<p>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."</p> <p>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?</p>		
9.69.121	<p>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?</p> <p>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):</p> <p>"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."</p> <p>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? (EXA Request)</p>	<p>The impact of the Scheme on severance and safety for non-motorised uses has been assessed within the Environmental Statement. What has not been assessed in the Environmental Statement is the potential effect that any changes in severance and safety for non-motorised uses could potentially have on town centre vitality, since this a potential economic impact, rather than an environmental impact.</p>	<p>To find which chapter of the ES might deal with severance, I went to the ES Non-technical Summary, expecting to be signposted to the different chapters. No such luck! And there was no reference to this meaning of severance (difficulties in crossing roads due to traffic) in the entire summary.</p> <p>However, as I was looking, I came across this statement about the impact of the scheme on pedestrians (on page 35):</p> <p><i>"Reductions in traffic on local roads and the provision of new and improved walker, cyclist and horse rider facilities in the form of shared footways, bridleways and cycleways would provide improved and attractive pedestrian, cycling and horse riding facilities that would have a positive effect on road safety in the area."</i></p> <p>Knowing what we now know, and what the writers of the summary knew when they were writing it, about the increase of traffic on many roads throughout Glossop, and the non-improvement of the situation for non-motorised users in Hollingworth and Tintwistle, I would say that this statement is not a fair summary of the impacts of this scheme.</p> <p>In addition to which, I do not call a cycle-and foot- way running alongside the Spur road carrying a predicted 21,000 vpd an "improved and attractive facility." Sounds more like a health hazard to me, and anyone with any care for their good health would not use it.</p> <p>And so, I try again! The "Index" has no index to key words, so . . . I try ES Chapter 12 as that seems to be the only chapter where severance might fit within the title. And indeed that is where it is considered.</p> <p>Most instances of the word concern severance of agricultural holdings or general severance affecting businesses. There are just two relevant references to severance defined as 'difficulty</p>

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			<p>in crossing the road due to traffic' in the entire document of 149 pages.</p> <p>The first reference is this:</p> <p><i>“Schemes will also be expected [says the NPS-NN] to improve accessibility and inclusivity and reduce community severance” (page 5)</i></p> <p>And the second reference is this:</p> <p><i>12.9.84 During the Operational phase, the Scheme would reduce community severance through the separation of local and regional traffic resulting in large reductions of traffic on the existing A57. This would have allowed the opportunity to make this stretch of road much more friendly to cyclists and pedestrians (across all groups) through improved facilities and crossings, public realm improvements and reduction in speed. This is anticipated to lead to positive benefits to health and wellbeing.</i></p> <p>If this is what the applicant means when he makes a claim that a subject – in this case severance – “has been assessed within the environmental statement” then his standards are abysmal. There is effectively no information whatsoever on the impact on severance of the scheme beyond the narrow confines of the DCO boundary, that narrow strip which the Applicant seems to think is all the “local area” that there is.</p> <p>I would suggest that this “assessment” of what the NPS-NN thinks is an important matter (see first quote from that document above) may be in breach of the 2017 Regulations</p>
9.69.12 2	<p>Basic error in the information</p> <p>I copy below TAR Table 7.3 which tabulates the accidents actual and predicted on the network</p>	<p>The discrepancy in the number of fatal accidents presented in Table 7.3 of the TAR is due to rounding of decimal places. The analysis of forecast accident rates is based on forecast averages per year over 60 years, so it is appropriate to use decimal places for this analysis.</p>	<p>My bad. If one takes an average, even of a binary thing like – are you dead or alive – then you do end up with percentage points, and therefore rounding may be applied. Apologies for this one, and I completely withdraw the accompanying criticisms. ☺</p>



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ink Roads  
Transport Assessment Report

**Table 7.3: Accidents and Casualties over Appraisal Period (Whole N**

Scenario	Accident Summary (PIAs)	Casualty Summary (Casualties, by Severity)			Economic Impact PVB
		Fatal	Serious	Slight	
Do-Minimum	34,884	431	4,691	43,599	£1,...
Do-Something	34,986	438	4,718	43,755	£1,...
Impact	-102	-6	-28	-156	-£7...

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

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

accident

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. It 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.

9.69.12  
3

**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

The purpose of the TAR is to explain the traffic and transport related impacts of the proposed Scheme. The alternative to the proposed Scheme considered by National Highways and the justification for their rejection are set out in Chapter 3 of the Environmental Statement (APP-060).

I accept that it is a legitimate interpretation of what one should include when writing a Transport Assessment Report to say that any appraisal of alternative packages might sit better elsewhere. It is however true that a TAR should include accurate information about present bus and Rail services, about present conditions for walking and cycling, and about how much potential there is for improvements in those services and in those conditions.

I am aware that ES Chapter 3 considers the question of alternatives which were considered in the studies carried out in 2014 and 2015. I believe that the ES fails to adequately state and compare the alternatives with reference to their environmental impacts and so is not compliant with the EIA Regulations 2017. But that is a question for somewhere else.

The fact remains that HE/NH at ISh (Issues Specific Hearing) 3, did not address the questions raised by the Examining

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The fact remains that HE/NH at ISh (Issues Specific Hearing) 3, did not address the questions raised by the Examining

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	<p>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.</p> <p>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:</p> <p>The impact on climate change;</p> <p>The impacts on residential streets;</p> <p>The failure to solve the problems of Hollingworth, Tintwistle and Glossop,</p> <p>The problems surrounding air quality;</p> <p>The impacts on the National Park;</p> <p>Impact on the green belt</p> <p>The extra ordinary cost when all these problems are taken into account, pre-empting other better expenditure</p> <p>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.</p> <p>Here is a simple list of what the TAR could have and should have considered:</p> <ol style="list-style-type: none"> <li>1. Whether and to what extent the existing bus service could be improved</li> <li>2. Whether and to what extent the existing rail service could be improved</li> </ol>		<p>Authority about restraint of motor vehicles, encouraging active travel, and promoting routes which avoid the National Park, all of which are key elements of alternative provision. The answer diverted attention away from these matters and to the sole question of HGVs.</p>
9.69.124	<p>3. BUSES</p> <p>"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</p> <p>The section concludes with the extraordinary statement at paragraph 3.4.1: "It is expected that</p>	<p>Further detailed information on the anticipated impacts of the Scheme on bus journey times is being submitted into the DCO Examination by National Highways at deadline 7 in its response to question 3.17 in the Examining Authority's Second Written questions.</p>	<p>Glad to hear it, will take a look now . . .</p> <p>I think I have found it, NOT under deadline 7 but deadline 6. (REP6-017)</p> <p>The figures which NH are offering give reductions in journey times on the 341 and increases in the 237. This is plausible.</p> <p>However, the matter of journey times around Glossop's distributor roads has now become a critically important matter, as it determines the whole debate around traffic routing at the Shaw Lane junction. So the model should be put under intense scrutiny.</p> <p>In addition there are unresolved questions around "where does</p>

Reference	DW Deadline 5 comments	National Highways Response	DW Deadline 9 response
	<p>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?</p> <p>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.</p> <p>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"</p>		<p>the traffic go?" both in Hollingworth and at Glossop High Street East. (see above, my response to 9.69.115)</p> <p>The jury is out on any verdict on changes in bus journey times if the scheme were to be built, until these two matters are resolved. The first one involves detailed consideration of how the model actually works and if the predicted journey times are robust. The second would make clear, finally, what additional traffic flows we are really talking about.</p>
9.69.125	<p><b>4. CLIMATE CHANGE</b></p> <p>The phrase "climate change" does not occur in the TAR. Nor even does the word "climate" Enough said!</p> <p>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.</p> <p>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.</p> <p>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" does not appear once.</p>	<p>The purpose of the TAR is to explain the traffic and transport related impacts of the proposed Scheme. The environmental impacts of the Scheme are presented in the Environmental Statement, with the impact on climate change presented in Chapter 14 (REP1-019)</p>	<p>I accept that it is a legitimate interpretation of what one should include when writing a Transport Assessment Report to say that any appraisal of climate change might sit better elsewhere.</p> <p>However the issue is SO important, that the TAR should certainly mention it as an issue which affects transport choices, whether they are being made by individuals or by local or national government bodies, and provide a signpost to where it is dealt with thoroughly. Not to do so sends a very particular message, as I demonstrated in what I wrote.</p> <p>In passing it should be said that the assessment in the ES is inadequate, but that is being debated elsewhere, including by me).</p>

Reference	DW Deadline 5 comments	National Highways Response	DW Deadline 9 response
	<p>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.</p>		
9.69.12 6	<p>6. HGV's</p> <p>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.</p> <p>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.</p> <p>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!!!</p> <p>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</p>	<p>HGVs have been properly considered in the assessment of impacts of the Scheme. The Scheme is forecast to result in a very significant reduction in HGVs using the existing A57 between Hollingworth and the M67, with HGVs switching to the new Link Road. Elsewhere, the Scheme is not forecast to significantly alter the proportion of HGVs using any roads across the modelled road network, i.e. where traffic flows are forecast to change due to the Scheme, then the number of HGVs is generally forecast to change in proportion to the change in traffic flow.</p>	<p>The answer given by HE/NH here about HGVs gives us the one fact that the proportion of HGVs in traffic flows will remain roughly the same with the scheme as without it. All the other very salient issues around HGVs which I raise are ignored in HE/NH's response just as they are ignored in the TAR.</p> <p>Here are these salient issues:</p> <p>What are the overall trends in HGV numbers and behaviour?</p> <p>What are the specific impacts which HGVs impose on people and buildings and environment, in particular when they form such a high proportion of the traffic flow?</p> <p>Of the additional traffic which will be attracted into this area by the scheme what percentage will be HGVs and what are the absolute numbers involved?</p> <p>Given that HGV removal was the top policy measure for the public in the Longdendale Transport Strategy Consultation in 2010, what are the available policy measures to reduce their number or to remove them from this area altogether?</p> <p>Is there any robust evidence about the behaviour of HGVs when faced with congestion on a major route and how likely are they to divert onto less suitable at perhaps quicker ways of reaching their destination i.e. rat runs? (this is of course a vital question for the Shaw Lane junction discussion)</p>

Reference	DW Deadline 5 comments	National Highways Response	DW Deadline 9 response
	<p>Hadfield Alternative.</p> <p>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.</p>		
9.69.127	<p>5. GLOSSOP</p> <p>This section simply allows me to point out all the occasions where Glossop is simply ignored.</p> <p>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</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Transport Assessment Report? I think not.</p>	<p>See response to 9.69.119 Which is:</p> <p>Additional information on the changes in traffic flow on Dinting Road and Shaw Lane due to the Scheme has not been withheld and has been provided by National Highways during the DCO Examination as soon as requested. See National Highways’ comments RR-0240-15 and RR-0751-1 on Relevant Representations (REP1-042). The increase in traffic flows on Dinting Road and Shaw Lane due to the Scheme are due to additional traffic demand routing along these roads to avoid traffic congestion and delay on the A57 Glossop High Street.</p> <p><i>(copied into this cell by DW, 22/04/2022)</i></p>	<p>National Highways just do not get this, do they?</p> <p>At this examination we have eventually, with less than one month to go to the end, some idea of the extent of this diversion of additional traffic into the local distributor roads of Glossop, and we are starting to grapple with the resultant issues, with the first focus being on the Shaw Lane junction because of its implications for the Dinting AQMA.</p> <p>The fact remains that the TAR should have informed us of this basic information which is quite definitely a matter of traffic and transport. How much additional traffic will there be on the local distributor road network both in percentage terms and in absolute terms? The answer to that question emerged only a few weeks ago when it should have been common knowledge from the outset.</p> <p>In addition the TAR should have enabled participants to scrutinise these predictions as they are absolutely critical to assessing the “adverse impact” of the scheme which is necessary under the Planning Act 2008 section 104 subsection 7. It is not enough for a participant to be expected to believe in the black box presented to us by National Highways. What are the parameters and what are the values being placed on these parameters and how do they change under different traffic conditions? We were given a glimpse of these matters at ISH3 by Mr. Katesmark but what he said could not be tested or challenged, as I remember, and there are just three and a half weeks left of the examination’s normal allotted time span.</p> <p>This examination has been presented with a Transport Assessment Report which fails to give the ExA and stakeholders adequate information. I do not believe that the examining authority as a result of this failure is now in a position to say confidently and believably that they can assess the adverse effects of the scheme as required by NPS-NN paragraph 4.3 and the Planning Act 2008.</p>

Reference	DW Deadline 5 comments	National Highways Response	DW Deadline 9 response
9.69.128	<p>7. JOURNEY TIMES</p> <p>Longer routes journey times</p> <p>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.</p> <p>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 its <i>raison d'être</i>, 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?</p> <p>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.</p> <p>So what are we to make of this key claim, that connectivity will be improved and therefore employment opportunities, economic growth etc. will follow?</p>	<p>The economic assessment of the Scheme includes all the journey time changes along the entire route for every trip within the Area of Detailed Modelling (ADM), including from Manchester to Sheffield. It is only trips which don't pass through the ADM (e.g. Sheffield to Sheffield) that are excluded from the economic assessment, as these are not considered material to the assessment of the Scheme. Please also refer to National Highways' comment 7.27 on Derbyshire County Councils' Local Impact Report (REP3-018) and comment 9.54.64 on Keith Buchan's Deadline 4 submission on behalf of CPRE PDSY (REP5-022), specifically regarding changes in journey times between Sheffield and Manchester due to the Scheme.</p> <p>(I think the below is the NH response to the second of the 2 submissions mentioned above.)</p> <p>“The changes in journey times for all vehicles across the whole of the modelled road network that pass through the area of detailed modelling (ADM) are captured in the assessment of the Scheme.</p> <p>Of the total travel time benefits delivered by the Scheme, approximately 6% comes from trips between Manchester and Sheffield. A further 10% comes from trips which start or end in Manchester or Sheffield with the other end of the trip in the corridor between them. The bulk of the remaining benefits are for more local journeys in the vicinity of the Scheme. The Scheme is forecast to deliver time savings of approximately 5 minutes per vehicle for journeys between Sheffield and Manchester, depending on exactly where journeys start and end in each city, which is substantial when multiplied by the many millions for journeys that will benefit from these journey time saving per year. The journey time savings also result in wider economic benefits.”</p> <p><i>(copied into this cell by DW, 22/04/2022)</i></p>	<p>Please can the ExA put this right by requesting the Applicant to do a proper TAR? <b>Request to ExA</b></p> <p>Once again, NH wants us all to take the outputs of their black box on Trust. There are a number of problems with this.</p> <ol style="list-style-type: none"> <li>1 The overall credibility of National Highways. I do really want to write a submission covering this matter in depth but for now I can briefly say that I believe that their track record is one of missing and misleading information. This feeds in to the way we consider all the matters below.</li> <li>2 The issue of the surplus traffic in Hollingworth and in Glossop High Street East has to be resolved. Where does this traffic go to and come from? (not forgetting the Mottram Market Street Mystery, which NH have still not addressed)</li> <li>3 The additional 7500 vehicles per day which come into and go out of this area at the M67 junction were the scheme to be built, will add to congestion and delay. It is hard to believe a narrative of general and large-scale time savings in this scenario.</li> <li>4 So for example there will be additional traffic on the narrow A628 from the Gun Inn junction onwards to the East, and the more traffic there is the more chance of breakdown, accident, and delay. Meanwhile down on the A57 on Brookfield Road the additional 4500 vehicles per day will either carry on down the already congested A57 or they will end up, encouraged or not by junction design and signage, avoiding that congestion and with it the potential legal problems in Dinting, diving into the side streets of Glossop, whereupon the model will tell us how much delay can be expected.</li> </ol> <p>But remember, the model “wants” the traffic to “come this way”, and not stay on the A57, so the temptation will be there to understate delays.</p> <ol style="list-style-type: none"> <li>5 And perhaps the biggest problem is that the delays WITHIN the two ends of the journey, Manchester and Sheffield, have a greater influence on the eventual journey times than the bypass of one junction in Mottram . . .</li> </ol> <p>And so the question remains, is all this trauma worth it?</p> <p>And we have not got to <i>reliability</i> yet . . .</p>

Reference	DW Deadline 5 comments	National Highways Response	DW Deadline 9 response
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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



**1.2 Scheme overview and objectives**

- 1.2.1 The primary objectives of the Scheme are:
- Connectivity – by reducing congestion and improve the reliability of people’s journeys between the Manchester and Sheffield city regions.
  - Environmental – improving air quality and reducing noise levels in certain areas, through reduced congestion and removal of traffic from residential areas. The scheme is also being designed to avoid unacceptable impacts on the natural environment and landscape in the Peak District National Park.
  - Societal – by re-connecting local communities along the Trans-Pennine route.
  - Capacity – by reducing delays and queues that occur during busy periods and improving the performance of junctions on the route.

**1.3 Project sponsors and stakeholders**

1.3.1 The Scheme is a National Significant Infrastructure Project (NSIP) as set out by the requirements within Sections 14 (1)(h) and 22 (1) of the Planning Act 2008

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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;

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	<p>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.</p>		
9.69.129	<p><b>RELIABILITY</b></p> <p>The truth about reliability</p> <p>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):</p> <p>“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.”</p> <p>Having done the detail, the report summarises as follows:</p> <p>“1.3 Current Challenges and Priorities</p> <p>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</p> <p>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:</p> <ul style="list-style-type: none"> <li>• Journey-times are increased by delays at junctions and the geometry and topography of routes;</li> <li>• Long term traffic growth will bring some urban sections of routes to their capacity.</li> <li>• Accidents reduce journey time reliability, with high accident rates on some routes and a number of accident clusters;</li> <li>• Severe weather causes road closures which reduce journey time reliability;</li> <li>• Maintenance on single carriageway sections</li> </ul>	<p>It’s not possible to quantify likely changes in journey time reliability due to the Scheme. However, it has been established that when a road network is operating close to or at capacity, then small increases in traffic demand will often cause exceedance in capacity which results in swift and exponential growth in traffic congestion and delay. Consequently, relatively small fluctuations in traffic demand on a road network operating close to or at capacity, such as along the A57 through Mottram, can significantly alter levels of traffic congestion and delay and thereby, result in poor journey time reliability. The Scheme will increase road capacity on the A57 between Hollingworth and the M67 to accommodate forecast traffic growth, with most of the road network in the vicinity of the Scheme forecast to operate within capacity. Consequently, the Scheme will make this section of road network less sensitive to congestion and delay from fluctuations in traffic demand and, therefore, it is anticipated to improve journey time reliability.</p>	<p>I do hope that the ExA and stakeholders at this Examination take note of what an extraordinary turnaround this response of HE/NH is.</p> <p>Reliability has gone from being the Poster Boy of this scheme, one of the main foundations of the benefits it would bring, one of the top selling points to the general public to being something which we cannot measure at all.</p> <p>I will look first at the poster boy aspect and then at the merits of the argument.</p> <p><b>1 the Poster Boy argument: At the top of the TAR</b>, the very first sentence of paragraph 1.1.1 reads:</p> <p><i>“The A57 and A628 between Manchester and Sheffield currently suffer from heavy congestion, creating unreliable journeys which limits journey time reliability.”</i></p> <p>On the next page, under Scheme Objectives, the first one is:</p> <p><i>“1.2.1 The primary objectives of the Scheme are:</i></p> <ul style="list-style-type: none"> <li>• <i>Connectivity – by reducing congestion and improve (sic) the reliability of people’s journeys between the Manchester and Sheffield city regions”</i></li> </ul> <p><b>In the consultation brochure</b> which was the principal document to inform the public during the public consultation 2020 the first promise made to the public in the list on Page 8 of what the scheme would do was as follows:</p> <p><i>“The scheme will:</i></p> <p><i>Reduce congestion and improve the reliability of people’s journeys – through Mottram in Longdendale and between Manchester and Sheffield”</i></p> <p>I think that what I said above about reliability being the poster boy for this scheme is borne out by these quotes.</p> <p><b>2 the argument for reliability:</b></p> <p>Remember that the background to this response of HE/NH is the fact that the Trans-Pennine Routes Feasibility Study Stage 1 Report written in February 2015 lists 7 factors, or "high priority challenges" which, <i>“have a direct impact on</i></p>



Reference	DW Deadline 5 comments	National Highways Response	DW Deadline 9 response
	<p>reduces journey-time reliability;</p> <ul style="list-style-type: none"> <li>Asset condition, including the standard, age and damage to infrastructure, reduce journey-time reliability through significant maintenance operations and risk from closures; and,</li> <li>There is a lack of technology to assist in the operation and management of the routes and provide information for travellers”</li> </ul> <p><i>(my emphasis)</i></p> <p>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?</p> <p>I would suggest that it is because the scheme does not and cannot address any of these issues.</p> <p>But it is dishonest, in a transport assessment, to ignore these. The reader is misinformed by omission.</p> <p>Note that the writer of the TAR is aware of this report, citing it when dealing with severance (at para. 3.7.14).</p> <p><b>The importance of reliability in the case for this scheme</b></p> <p>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”:</p> <p>“1.2.1 The primary objectives of the Scheme are:</p> <ul style="list-style-type: none"> <li>Connectivity – by reducing congestion and improve (sic) the reliability of people’s journeys between the Manchester and Sheffield city regions”</li> </ul> <p>And it was the first promise which the scheme’s promoters made to the public in the Consultation Brochure (page 8):</p> <p>“The scheme will:</p> <p>Reduce congestion and improve the reliability of people’s journeys – through Mottram in Longendale and between Manchester and Sheffield”</p> <p>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?</p>		<p><i>connectivity between Manchester and Sheffield.”</i></p> <p>These factors are, briefly put, as follows:</p> <ol style="list-style-type: none"> <li>junction delays and the geometry and topographies of the routes</li> <li>the fact that long-term growth in traffic will bring some urban section of routes to their capacity</li> <li>high accident rates,</li> <li>severe weather,</li> <li>delays caused by maintenance,</li> <li>poor asset condition, and</li> <li>a lack of technology.</li> </ol> <p>Fuller descriptions are in my original opposite.</p> <p>You will note that factors 1 and 2 are the only ones which the scheme has an effect on. However beneficial the scheme might be in improving these two factors, factors 3,4,5 and 6 remain unchanged. These four factors cause the corridor to have <b>a road closure every 11 days on average with two-thirds these closures being longer than 2 hours.</b></p> <p>Indeed we have just experienced a landslip due to very heavy rain, which closed one of the routes in the corridor for weeks, and the main repair of the landslip has not yet even started. And heavy rain events as we know from the IPCC, will become more frequent, specifically in our part of the world, as a result of climate disruption. (see Appendix I of my Deadline 2 submission: items 2,4 and 8. (REP2-072))</p> <p><b>It is really very simple: this corridor across the Pennines is inherently unreliable,</b> and it is quite probable that it becomes more so. To have claimed anything else was just plain silly. To cure it would cost billions. But there is always the railway line, inherently more reliable, and just now having its capacity enhanced, and with electrification being talked about.</p> <p>Hmmmm, why didn’t we think of that . . .</p>

Reference	DW Deadline 5 comments	National Highways Response	DW Deadline 9 response
	<p>(Request to ExA)</p> <p><b>Further information</b></p> <p>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.</p>		
9.69.130	<p>10. SEVERANCE</p> <p>In a section in the TAR entitled “existing issues” we read this (para. 3.7.14):</p> <p>“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.”</p> <p>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)</p> <p>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.</p> <p>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:</p> <p>“1.2.11 The A628 also experiences a high number of pedestrian accidents within the urban section through Tintwistle at its western end.”</p> <p>How is it that the 2015 report can tell us about pedestrian accidents in Tintwistle (and anyone who</p>	<p>Please refer to National Highways’ response 3j &amp; 3k in the Written summary of Applicant's case at Issue Specific Hearing 2 (REP4-008).</p>	<p>Ah, that black box again.</p> <p>I remember well my shock at hearing at ISH2 the way that severance was viewed within some guidelines being quoted by one of the National Highways team, guidelines which came from the IEMA, and were being used as justification for their view that there was ‘nothing to see here’ and nothing needed to be done.</p> <p>So shocked was I and incredulous, that I checked out these guidelines.</p> <p>I know that I have written this in some submission or other but I can remember it well. The IEMA website gave the impression of an important and well-respected organisation. The guidance being referred to by NH was the oldest guidance issued by the IEMA which was still extant, and it was being reviewed, so clearly it was regarded as being in need of a refresh. A slight pinch of salt required then!</p> <p>We know that there are large percentage increases and large absolute increases in traffic being predicted for some of these roads. As I have argued elsewhere, and I believe as NH have agreed, these increases will be bunched and not evenly spread. The busiest times will remain the busiest times but they will be even busier with all that that implies.</p> <p>I would respectfully suggest that the ExA insists that the work done by NH on all the impacts of the increases in traffic in Glossop, including of course severance, be published to the inquiry so that all concerned can review it. <b>Request to ExA</b></p> <p>Nothing else will do if the ExA is to carry out their duty of assessing the adverse impact of this scheme as per the Planning Act section 4 subsection 7 and NPS-NN paragraph 4.3</p>

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	<p>has stood alongside the road in Tintwistle as I have can understand how this could be) and the TAR says not a word?</p> <p>How is it that there is no discussion of the extra traffic to be loaded onto Dinting Road/Shaw Lane?16</p> <p>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"</p> <p>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.</p>		
9.69.13 1	<p>11. TRAINS</p> <p>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.</p> <p>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?</p> <p>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</p>	<p>Please refer to National Highways' response to question 3.3 of the Examining Authority's Second Written questions (REP6-017).</p>	<p>The question of the ExA was about the aspirations at local and national level to transfer more journeys to sustainable modes, and whether this was reflected in the model. The gist of HE/NH's reply was:</p> <p><i>"However, the modelling used for the assessment of the Scheme does take account of the anticipated schemes in the 2016 Network Rail Route Specifications."</i></p> <p>But what I was saying about the TAR's approach to rail was not about that.</p> <p>I was concerned about the potential for modal shift to rail, the effect this would have, what the policy environment, at local and national level was. I would want to know what the potential for more freight and passenger be on the Hope Valley line following its capacity enhancement works.</p> <p>All matters which a proper <i>assessment</i> would tackle.</p> <p>The reply of NH misses the point entirely.</p>

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	<p>what extent is the rail 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?</p> <p>There is not a word about any of these matters in the TAR.</p> <p>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.</p>		

