

1. REP6-034 Daniel Wimberley comments on Deadline 5 Submissions

Response reference:	DW Deadline 6 comments	National Highways Response at Deadline 7	DW Deadline 9 response
9.70.25	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	No response required	
9.70.26	<p>Summary</p> <p>Five examples of the discrepancies and implausibilities in the results of HE's traffic modelling are brought to light in this document: the "Market Street anomaly"</p> <p>the Bamford anomaly: a forecast drop in traffic through Bamford whilst the traffic increases by 38% on Snake Pass is implausible</p> <p>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</p> <p>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</p> <p>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</p>	See National Highways responses below.	

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	rise to additional trips.		
9.70.27	<p>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. 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.</p>	See National Highways' response below.	
9.70.28	<p>In denying the public this fundamental information HE are not complying with their own licence, nor with the Nolan Principles.</p> <p>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.</p> <p>Do-Something and Do-Minimum traffic flows should be compared with a baseline, the nearest possible to "current" flows.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>		

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	<p>authority such as HE.</p> <p>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.</p> <p>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.</p> <p>HE should not take refuge in obsolete guidance, but assess these impacts in a proper, rigorous manner.</p>		
9.70.29	<p>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</p> <p>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.</p>	<p>National Highways has undertaken a proper assessment of the impacts of the Scheme on pollution, severance, accidents intimidation and bus services. For several of these impacts there are no agreed criteria or thresholds for identifying significant effects and the consequently, the determination of significance is based on professional judgement.</p>	<p>Best news I have heard for a long time.</p> <p>1 From the context I do assume that NH in their reply are talking about an assessment of the scheme's impacts in Glossop. I just want to be sure that we are all singing from the same hymn sheet and that National Highways are not talking about some other, more general, assessment.</p> <p>2 It is fine IMO for there to be no laid down thresholds for some of these effects and that their importance will be estimated by people using their professional judgement. I do not see this as contradicting the requirement in the Planning Act 2008 and the interpretation of it in NPS-NN paragraph 4.3 that adverse impact be assessed. <i>(in fact I believe that the thresholds and limits can be used in such a way that they get in the way – what the Act calls for is a weighing up of ACTUAL adverse impact of the scheme against its benefits)</i></p> <p>Provided that there is an element of challenge during the Examination to help the ExA to make a reasoned determination of the issues involved for their report to the Secretary of State then it should be possible to meet the requirement of the Act.</p> <p>Please can the ExA request the release of the full assessment? Request to ExA</p>
9.70.30	<p>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.</p> <p>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.</p> <p>HE's assertions that "for other bus services there</p>	<p>The traffic modelling on which the assessment of the Scheme is based models the AM, Inter and PM peak periods, so does not spread the changes in traffic flow evenly throughout the day.</p> <p>Regarding the impact of the Scheme on bus services please see National Highways' response 3.17 to the Examining Authority's Second Written Questions (REP6-017).</p> <p>Both the Do-minimum and the Do-something scenarios include growth in traffic demand between the Baseline and both 2025 and 2040 and is therefore included in the</p>	<p>About the modelling: It is good that the model recognises that there are three parts to the day: morning peak evening peak and inter peak. However as I know from a past life, there is something called the rush hour which is completely different from the periods before and after even though in National Highways' schema they would all count as being part of the same time period. This really matters when we are talking about impacts of all kinds arising from traffic - the most obvious instance of this being the journey to school.</p> <p>About the busses: The figures which NH are now offering give reductions in journey times on the 341 and increases in the 237. This is plausible.</p>

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	<p>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.</p> <p>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</p>	<p>assessment of the impacts of the Scheme.</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 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 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> <p>On not ignoring the baseline traffic figures: It is important that the background growth in traffic, even though it is present in both the figures for Do-Minimum and the figures for Do-Something, is nevertheless made clear as a separate component in what is going on, in people's lived daily experience. We all need this information in order to make informed choices about how to handle this issue of traffic and transport and getting to where we want to go without doing harm, and that includes whether or not to build this scheme..</p> <p>I know that the intention of always comparing Do-Something to Do-Minimum is to isolate the difference that the scheme makes but actually everyone is getting a false picture of what is going on and that can only lead to bad decisions.</p> <p>I say it again: there should be some way of making it visually clear that the Do-Something increase over the Do-Minimum is just a part of the overall increase which would affect people's lives under NH’s Business-as-Usual policies. Worth noting, of course, that these are <i>not</i> the government’s policies, not any more.</p>
9.70.31	<p>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)</p> <p>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.</p>	<p>National Highways has no comment to make</p>	

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9.70.32	<p>Topics – DW text, HE replies and DW comments on replies TOPIC 1 - THE TRAFFIC MODEL DW 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 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</p> <p>DW COMMENT ON REPLY</p> <p>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. 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) 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</p>	<p>The Scheme results in a redistribution of traffic flows across the whole of the modelled road network but does not result in an overall increase in traffic demand. The redistribution of traffic due to the Scheme does, however result in increases in traffic on several roads in the vicinity of the Scheme, since some traffic is rerouting from alternative routes across the Pennines and from elsewhere, sometimes from routes quite remote from the Scheme, such as the M62 and A6/A623.</p>	<p>I think that this is the first explicit acknowledgement on the part of HE/NH that traffic does increase on roads "in the vicinity of the scheme," and this acknowledgement is to be welcomed. I don't think that this is what the public were led to believe during the public consultation in November 2020</p> <p>.</p> <p>This response of National Highways claims that traffic has redistributed but that overall demand has not increased. Two comments:</p> <p>1 I have not focused on this during this examination but a little something in the back of my mind tells me that when new capacity is built then extra traffic is the result. This is understandable as a new road acts as one vast advertising hoarding for itself. That is one of the reasons why building new capacity, with the shock value of its construction, followed by its shiny new appearance across the landscape, is likely to have a negative impact on people taking up active travel and public transport options.</p> <p>But I need not be so hesitant. I do believe that National Highways have already conceded that the road will generate new demand in the settlements around it! I remember clearly that somewhere they have "explained" the bubble of extra traffic in Hollingworth and the other bubble in Glossop High Street East, by saying that the new road would create new demand for road journeys going WEST!</p> <p>2 Then there is the reminder of the shocking revelation made during this Examination that traffic will <i>be attracted to a corridor running across a National Park</i> from roads as far away as the M62 in the north to the A623 / A6 in the south. This is the exact opposite of government policy on national parks which is that traffic be encouraged <i>away</i> from a Park.</p> <p>A comment on the model is in order. The response here of HE/NH to my original statements in the left hand column ignores what I say about them not opening up the model to scrutiny. I repeat my central complaint:</p> <p><i>"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"</i></p> <p>It's black box syndrome again, and it is unacceptable. I request the ExA to ensure that the workings of the model are made clear to this examination. Only then can we / you arrive at an informed understanding and then assessment of the adverse impact of the scheme. At the moment there are many outstanding issues and unverifiable claims. HE/NH cannot be allowed</p>

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	<p>seemed to be obvious nonsense, and in direct contradiction of what they themselves had said, and I demonstrated this in that submission 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 cons 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"</p> <p>Returning to HE's statements about the trustworthiness 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 trustworthiness on trust, in that we are not being allowed to see how this works.</p> <p>I have specifically asked for this information, back in 2020 – sigh – and been refused.</p> <p>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;</p> <p>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:</p> <p>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</p>		<p>to be uncooperative on this. I would add that this is a minimum request. There should be a full independent review but disclosure is in my view legally mandated. Request to ExA</p>

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	benefits of the options being considered when possible; this might be required where proposals have an impact on business or the voluntary sector.”		
9.70.33	<p>TOPIC 2 – DATA “NON GRATA” – i.e. DATA UNWANTED AND UNLOVED BY HE DW</p> <p>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</p> <p>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</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>The Transport Assessment Report (TAR) (APP-185) was prepared in accordance with industry standard best practice which is based on previous Department of Transport (DfT) guidance on the preparation of transport assessment that was withdrawn several years ago and not subsequently replaced by alternative guidance. Therefore, currently there is no guidance regarding the preparation of transport assessments for transport schemes.</p>	<p>First national highways claim that the transport assessment report “has been prepared in accordance with best practise guidance” and now we find that the story has changed quite a bit, as you can see from the response of National Highways here.</p> <p>The two versions can just about be squared, but what is important is that regardless of the status of the guidance and the fact that there is currently no guidance regarding the preparation of Transport assessments for transport schemes, it remains true that on accidents, Glossop, HGVs, journey times, reliability, severance, trains, buses the TAR is lamentable, The reference to where I have written a detailed 17 page critique of the TAR is opposite...</p> <p>Please ExA, request the applicant to produce for this EiP an adequate TAR, We are still trying to catch up with extracting and assessing information which should have been available at the outset. Request to ExA</p>
9.70.34	TOPIC 3 – WHAT SHOULD WE BE COMPARING WITH WHAT IN THE MODELLING? DW	Please refer to National Highways’ comments on Mr Wimberley’s (12 th comment - REP5-021).	On not ignoring the baseline traffic figures: It is important that the background growth in traffic, even though it is present in both the figures for Do-Minimum and the figures for Do-Something, is nevertheless made clear as a separate component in what is going on, in people's lived daily experience. We all need this information in order to make informed choices about

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	<p>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</p> <p>Screening out small changes in traffic flows from an impact assessment is industry standard best practice. DW COMMENT ON REPLY</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Secondly, my point re comparing the flows being predicted with the scheme to the flows being</p>		<p>how to handle this issue of traffic and transport and getting to where we want to go without doing harm.</p> <p>I know that the intention of always comparing Do-Something to Do-Minimum is to isolate the difference that the scheme makes but actually everyone is getting a false picture of what is going on and that can only lead to bad decisions.</p> <p>I say it again: there should be some way of making it visually clear that the Do-Something increase over the Do-Minimum is just a part of the overall increase which would affect people's lives under NH’s Business-as-Usual policies. Worth noting, of course, that these are <i>not</i> the government’s policies, not any more.</p>

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	<p>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. (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.)</p>		
9.70.35	<p>TOPIC 4 - THE MOTTRAM MARKET STREET ANOMALY DW</p> <p>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</p> <p>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</p> <p>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. 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</p>	<p>Please refer to National Highways' comment 9.54.70 on Keith Buchan obo CPRE PDSY deadline 4 submission (REP5-022)</p>	<p>Sorry the explanation given there does not make any sense at all to me, and possibly also to the ExA!</p>

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	<p>would be helpful if HE were to explain! 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. 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.</p>		
9.70.36	<p>TOPIC 5 - 'TRAFFIC WILL NOT INCREASE OVERALL' DW</p> <p>'traffic will not increase overall' 7.1 HE replies Q.4.1</p> <p>Fust 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 . . .</p> <p>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: 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. 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</p>	<p>Traffic demand is forecast to increase regardless of whether this Scheme is implemented. This additional traffic demand will result in increased traffic flows across the modelled road network, but the distribution of the additional traffic across the road network will vary depending on where there is and where there isn't reserve capacity to accommodate additional traffic flows. There cannot be any significant traffic growth along routes already operating at, or close to, capacity. This is the reason that the traffic flows on the M67, A628 and A57 in the 2025 Do-minimum scenario are forecast to be similar to the baseline.</p> <p>The additional traffic demand is instead forecast to find alternative routes, leading to increases in flows on other parts of the road network. In several cases this is forecast to result in large increases in traffic flows on unsuitable or undesirable roads. Whilst the Scheme does not eliminate this forecast problem completely, it substantially alleviates it.</p>	<p>So many things here!</p> <p>1 The scenario presented in the first sentences of National Highways response is kind of plausible. What the reader may not notice but is implicit in these sentences is that this mode of thinking operates in a policy vacuum, or rather there is one policy, and that is "predict and provide."</p> <p>This policy is completely inappropriate in a time of climate crisis and in fact our government has recognised this. Now every strand of transport policy apart from the roads programme is directed towards limiting traffic by encouraging transfer to walking, cycling, bus and rail. This will simultaneously alleviate all the problems of the area related to traffic as well as raising well-being to a new level.</p> <p>2 National Highways argue that because the network is operating close to capacity, traffic flows cannot increase between the 2015 baseline and the Do-Minimum 2025.</p> <p>Firstly, most of the time, the network is operating <i>within</i> capacity and secondly the figure for 2019 at the M67 junction, which is based on a DfT automatic traffic count, is far higher than the 2015 baseline figure, which gives the lie to the claim that the network 'can't take any more.'</p> <p>3 Even if National Highway's second paragraph is correct in saying that the additional traffic will find its way along unsuitable roads, the vast bubbles of traffic in Hollingworth and Glossop High Street East remain as question marks over the model. We await a plausible explanation from National Highways</p>

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	<p>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</p> <p>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?</p> <p>HE REPLY</p> <p>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 basehne situation due to forecast traffic growth.</p> <p>DW COMMENT ON REPLY</p> <p>There are three points to make here. 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: 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</p> <p>Secondly Highways England make the claim that "There is a roughly equal increase in overall vehicle kilometres in both the Do-something and</p>		

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	<p>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)</p> <p>“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) 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.</p> <p>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?</p> <p>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?</p> <p>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.</p>		

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	<p>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. It is obvious that with a lower baseline the differences in flows will be bigger.</p> <p>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.</p> <p>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 . . .</p>		
9.70.37	<p>TOPIC 6 – THE ADDITIONAL TRAFFIC ON GLOSSOP’S LOCAL ROAD NETWORK AND ITS IMPACTS</p> <p>DW</p> <p>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)</p> <p>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</p>	<p>National Highways has undertaken a proper assessment of the impacts of the Scheme on pollution, severance, accidents intimidation and bus services. For several of these impacts there are no agreed criteria or thresholds for identifying significant effects and the consequently, the determination of significance can only be based on professional judgement.</p>	<p>Best news I have heard for a long time. Brief Summary: When are we going to see this assessment?</p> <p>1 From the context I do assume that NH in their reply are talking about an assessment of the scheme’s impacts in Glossop. I just want to be sure that we are all singing from the same hymn sheet and that National Highways are not talking about some other, more general, assessment.</p> <p>2 It is fine IMO for there to be no laid down thresholds for some of these effects and that their importance will be estimated by people using their professional judgement. I do not see this as contradicting the requirement in the Planning Act 2008 and the interpretation of it in NPS-NN paragraph 4.3 that adverse impact be assessed. <i>(in fact I believe that the thresholds and limits can be used in such a way that they get in the way – what the Act calls for is a weighing up of ACTUAL adverse impact of the scheme against its benefits)</i></p> <p>Provided that there is an element of challenge during the Examination to help the ExA to make a reasoned determination of the issues involved for their report to the Secretary of State then it should be possible to meet the requirement of the Act.</p>

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	<p>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)</p> <p>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. 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 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.</p> <p>REPLY BY HE</p> <p>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.</p> <p>DW COMMENT ON REPLY</p> <p>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.</p> <p>This statement by HE sounds SO anodyne, it is written in the customary bureaucratic grey prose,</p>		<p>So, please ExA, ask for this assessment to be released to this Examination in full. Request to ExA</p>

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	<p>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.</p> <p>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?</p> <p>1. The view of Highways England is not shared by High Peak Borough Council (HPBC).</p> <p>Here is an extract from their Local Impact Report (LIR):</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.” (Summary Comments of the HPBC LIR, bullet point 8)</p> <p>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)</p> <p>2. HE takes refuge in some obsolete guidance</p> <p>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:</p> <p>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</p>		

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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?

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

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"
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

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

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	<p>them has not been collected or modelled, or published, whichever is the case.</p> <p>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.</p> <p>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. 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. 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?</p>		
9.70.38	<p>4. can these impacts be ignored?</p> <p>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</p>	See previous response above.	See previous response above

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	<p>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.</p>		
9.70.39	<p>5 the additional traffic and its associated impacts will be concentrated at certain times of day</p> <p>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. 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.</p>	<p>The assessment of the impacts of the Scheme and the consequential effects has been based on the highest forecast increase in hourly flows across the three modelled peak periods, i.e. the AM, Inter, PM peak periods. It is not based on spreading the forecast increase in traffic flows evenly throughout the day.</p>	<p>This response is a little bit confusing, but If I understand this correctly, that is excellent news. It will make for a better assessment. Sorry to go on a bit, but when do we get to see it?</p>
9.70.40	<p>6. the effect on accidents</p> <p>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.</p>	<p>The overall impact of the Scheme on road safety should be considered, since all road schemes of the type proposed are likely to result in a redistribution of traffic, with increases on some roads and decreases on others. Consequently, all road schemes are likely to result in an increase in road accidents on some roads and reductions on others. Overall, the Scheme is forecast to result in a 0.3% increase in accidents over 60 years, which is not considered to be significant.</p>	<p>I don't think we should accept this statistical inevitability approach. I think it may lead to accidents!</p> <p>To reduce accidents over a network, in addition to the three over-arching methods of acting on drink-driving, street lighting and speed control, you do serious work on logging them as they occur, analysing their causes, and taking effective action to reduce or eliminate them. The same methods apply if by an intervention you are changing traffic flows.</p> <p>However there is another approach applicable in settlements which is virtually guaranteed to reduce accidents and that is to remove conflict between people and vehicles by having pedestrianised areas or traffic free zones. In areas where this is not possible, severity as well as frequency is reduced by having area wide 20 mph speed limits, but the first option has great co-benefits..</p>
9.70.40	Conclusion of this section	No response required.	Wonderful! It is going to happen! <i>(see left hand column) I hope . . .</i>

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	<p>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)</p>		
9.70.42	<p>TOPIC 7 – MORE ON THE MODEL, IN PARTICULAR THE STATUS OF THE DFT 2019 FIGURES</p> <p>DW</p> <p>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</p> <p>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</p> <p>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</p>	<p>Traffic demand is forecast to increase regardless of whether this Scheme is implemented. This additional traffic demand will result in increased traffic flows across the modelled road network, but the distribution of the additional traffic across the road network will vary depending on where there is and where there isn't reserve capacity to accommodate additional traffic flows. There cannot be any significant traffic growth along routes already operating at, or close to, capacity. This is the reason that the traffic flows on the M67, A628 and A57 in the 2025 Do-minimum scenario are forecast to be similar to the baseline.</p> <p>The additional traffic demand is instead forecast to find alternative routes, leading to increases in flows on other parts of the road network. In several cases this is forecast to result in large increases in traffic flows on unsuitable or undesirable roads. Whilst the Scheme does not eliminate this forecast problem completely, it substantially alleviates it.</p>	<p>So many things here!</p> <p>1 The scenario presented in the first sentences of National Highways response is kind of plausible. What the reader may not notice but is implicit in these sentences is that this mode of thinking operates in a policy vacuum, or rather there is one policy, and that is "predict and provide."</p> <p>This policy is completely inappropriate in a time of climate crisis and in fact our government has recognised this and every other strand of transport policy apart from the roads programme is directed towards limiting traffic by encouraging transfer to walking, cycling, bus and rail. This will simultaneously alleviate all the problems of the area related to traffic.</p> <p>2 National Highways argue that because the network is operating close to capacity, traffic flows cannot increase between the 2015 baseline and the Do-Minimum 2025. Firstly, most of the time, the network is operating <i>within</i> capacity and secondly the figure for 2019 at the M67 junction, which is based on a DfT automatic traffic count, is far higher than the 2015 baseline figure, which gives the lie to the claim that the network 'can't take any more.'</p> <p>3 Even if National Highway's second paragraph is correct in saying that the additional traffic will find its way along unsuitable roads, the vast bubbles of traffic in Hollingworth and Glossop High Street East remain as question marks over the model. We await a plausible explanation from National Highways</p>

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14),			
9.70.43	<p>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.</p> <p>DW COMMENT ON REPLY</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Please refer to National Highways' response to the Examining Authority's Second Written Question 3.14 (REP6-017).</p>	<p>The response referred to contains the following statement:</p> <p><i>“A6013 provides a link between the A6187 and the A57 that runs in a north-south direction and therefore, the Scheme is not forecast to result in traffic re-routing along the A6013 through Bamford, as there will be no journey time benefits in using it for east-west journeys across the Pennines that the Scheme provides for.”</i></p> <p>Very strange as we have learnt in this examination that around half of the additional traffic on the Trans-Pennine corridor somehow reaches it from the A623/A6. One route up from that road to the corridor is through Bamford.</p> <p>What National Highways are saying about traffic in Bamford increasing by - 1% when the traffic over Snake Pass increases by 38% is that all the increase in traffic (going Eastward) will go straight through to Sheffield and not turn right at the Ladybower reservoir junction.</p> <p>We would need to know the turning movements as they are now at the T-junction on the reservoir but I very much doubt if basically no traffic at all going eastward turns right at the Ladybower Junction to go through Bamford.</p> <p>It is another instance of where a clear explanation would be helpful to everyone. The impacts on Bamford could be severe in terms of severance noise vibration danger, but we just don't know as things stand. Also of course at stake here is the credibility of the model itself.</p>
9.70.44	<p>TOPIC 9 – WHY IS AN INCREASE IN TRAFFIC OF 38% IN THE PEAK PARK LABELLED A “SLIGHT INCREASE”</p> <p>DW</p> <p>How can we explain this? Well, PDNPA have also noticed this. At Paragraph 8.4.6 of their LIR, we read:</p> <p>“8.4.6 The percentage increase in flow on the A57</p>	<p>The number of additional vehicles per minute quoted by National Highways is derived from the biggest forecast increase in hourly flows during any of the three peak periods modelled, i.e. AM, Inter and PM peak three hour periods.</p>	<p>Glad to hear this. Please confirm that the peak of the peak which you have taken really is that by saying which day of the week it is?</p> <p>I said that it might be more than 2 or 3 per minute implying that 2 or 3 per minute each way was ‘not that bad’ – but actually that is already enough to make crossing the road appreciably more difficult. 6 <i>extra</i> movements per minute is one <i>extra</i> vehicle every 10 seconds.</p>

Response reference:	DW Deadline 6 comments	National Highways Response at Deadline 7	DW Deadline 9 response
	<p>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."</p> <p>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</p> <p>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</p> <p>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. 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. HE also pull this trick of "small increase" with respect to Tintwistle – effectively saying: 'it is</p>		<p>But it is good that you are taking real peaks into a/c</p>

Response reference:	DW Deadline 6 comments	National Highways Response at Deadline 7	DW Deadline 9 response
	<p>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). 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?</p>		
9.70.45	<p>TOPIC 10 – IMPACT OF INCREASED TRAFFIC IN GLOSSOP AND ELSEWHERE ON BUS SERVICES</p> <p>DW</p> <p>Impact of this issue on bus services</p> <p>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) Firstly, Figure 3.5 on page 28 of the TAR shows bus routes in the area – the associated text gives more details. 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 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), 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</p>	<p>Please refer to National Highways' response to the Examining Authority's Second Written Question 3.14 (REP6-017). Also see Derbyshire County Council's response 3.18 to the Examining Authority's Second Written Questions (REP6-026)</p>	<p>Sorry, It is time to get this off to Admin. I have answered this either above in this document, or in the equivalent document for DL5.</p>

Response reference:	DW Deadline 6 comments	National Highways Response at Deadline 7	DW Deadline 9 response
	<p>sticking to time, are reasonable and which are not???</p> <p>HE REPLY</p> <p>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. 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.</p> <p>DW COMMENT ON REPLY</p> <p>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.”</p> <p>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”</p> <p>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.</p> <p>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.</p>		
9.70.46	TOPIC 11 – ACCIDENT RATES AND TRAFFIC FLOWS RECAP	National Highways has nothing further to add to this point.	

Response reference:	DW Deadline 6 comments	National Highways Response at Deadline 7	DW Deadline 9 response
	<p>DW</p> <p>TRAFFIC DATA - DATA NON GRATA – THE GLOSSOP QUESTION – (see screenshot on page 12 of original submission)</p> <p>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</p> <p>“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).</p> <p>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.</p> <p>HE REPLY</p> <p>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.</p> <p>DW COMMENT ON REPLY</p> <p>I can see that the new road, with its vastly better</p>		

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	<p>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)</p> <p>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. □</p> <p>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?</p> <p>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?</p>		
9.70.47	<p>TOPIC 12 – SCREENING OUT DECISIONS AND THE NEED FOR COMPARISONS WITH THE BASELINE</p> <p>DW</p> <p>TRAFFIC DATA - SCOPING OUT DUE TO TRAFFIC “INCREASE NOT BEING GREAT ENOUGH”</p> <p>I put it to you, the ExA, that this is simply not</p>	<p>National Highways accepts that an assessment of the Do-minimum or the Do-something scenarios against the baseline would give rise to different and potentially worse impacts and consequential effects. However, these would be due to increases in traffic demand currently forecast by the Department of Transport (DfT) and not those due to the Scheme. The impacts and consequential effect of the Scheme, as separate to those due to forecast increases in traffic demand, can only be assessed by comparing the Do-something with the Do-minimum.</p>	<p>Thank you for this clear and revealing response. The ever-increasing road traffic predicted and then enabled by the Department for Transport does indeed lead to worse impacts in the future whether or not the scheme is built.</p> <p>The first thing to do is to raise awareness that this is so not by concealing the background increase in traffic and its effects on our lives, but by including it in all presentations about transport, including the consultations and publicity around this scheme and others like it.</p> <p>And the second thing to do is that government policy has to change radically both in order to tackle climate change and in order to increase the well-being of all citizens especially those living in urban areas.</p> <p>And that is precisely what has happened, government policy <i>has</i> changed radically, and it follows that this scheme is now obsolete and will have to make way for better solutions.</p>

Response reference:	DW Deadline 6 comments	National Highways Response at Deadline 7	DW Deadline 9 response
	<p>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.</p> <p><i>HE REPLY</i></p> <p>Screening out small changes in traffic flows from an impact assessment is industry standard best practice.</p> <p>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 scenario.</p> <p>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.</p> <p><i>DW COMMENT ON REPLY</i></p>		

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	<p>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.</p> <p>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.</p> <p>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:</p> <p><i>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.</i></p> <p><i>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,</i></p> <p><i>The underlying growth in traffic is rendered invisible, and not present to the mind of the reader. This blind spot runs right through the</i></p>		

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	<p><i>examination, or rather through the presentation of the figures by HE.</i></p> <p>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 <i>inevitable</i>, rather than something which is in fact <i>highly malleable</i> and could be lowered by effective local measures, as the government is now calling for.</p> <p>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?</p>		
9.70.48	<p>THEME 2 –THE DOCUMENTS OF BBA RELEASED BY CPRE TO THE EXAMINATION</p> <p>My observations on this bundle of documents will be under the following headings:</p> <p>A single track methodology</p> <p>The uncertainties list</p> <p>Climate change</p> <p>The policy environment</p> <p>BCR's</p> <p>Switch of consultants</p> <p><i>A few preliminary remarks</i></p>	National Highways has provided additional information as and when requested by interested parties.	I think “no comment” is the best response.

Response reference:	DW Deadline 6 comments	National Highways Response at Deadline 7	DW Deadline 9 response
	<p>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.</p> <p>HE REPLY</p> <p>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.</p> <p>DW COMMENT ON REPLY</p> <p>effect on scrutiny</p> <p>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 <i>everyone else</i> under time pressure. If it is some sort of “standard practice” to withhold information of this type then maybe standard practice needs to change.</p>		

Response reference:	DW Deadline 6 comments	National Highways Response at Deadline 7	DW Deadline 9 response
	<p>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.</p>		
9.70.49	<p>HE as the purveyors of full and complete information</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Please refer to National Highways’ comments on Daniel Wimberley’s Deadline 4 submission.</p>	

