

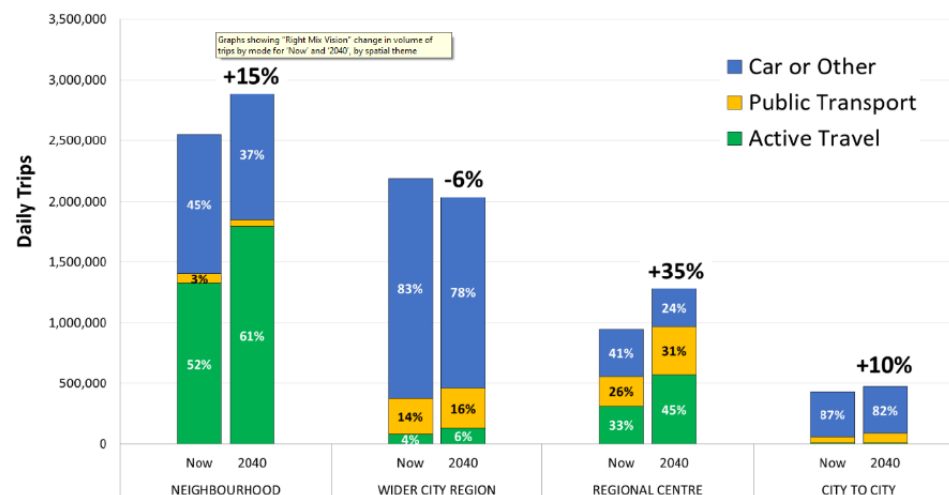
CPRE PDSY REBUTTAL OF REP8-018 - NH'S REBUTTAL OF REP7-036, REP7-034, REP7-035

REP7-036 Keith Buchan Response to REP6-017 and comments on Examining Authority's Second Written Questions (WQ2)		
Ref	NH comments	CPRE Response
9.74.1	(iii) No further BCR calculations until detailed design & economic assessment in Dec 2022	<p>The calculations NH now criticise were submitted to deadline 4 [REP4-016 page 6 onwards] and reproduce some of NH's numbers. The assumptions were made clear: i.e. a low and high growth scenario with high and low carbon values. Their new calculations do not agree with this table and no detail is given for them. This issue should have been raised earlier and is another example of the lack of technical dialogue resulting from NH's refusal to allow direct contact between professionals on this subject. We have many outstanding clarificatory request. Meanwhile we attach the worksheet on which the CPRE calculations are based (see accompanying Technical Note comparing the scheme's BCR with old and new values for carbon) It can be seen that it replicates the central forecast correctly, so it is hard to see why NH's figures differ from ours. Transparency on calculations such as these has been extremely late or non-existent.</p>
	(iv) No further traffic modelling with EFTv11 calculation	<p>This approach reveals the essence of the NH approach – that they avoid as much as possible incorporating the latest transport policies and programmes and even guidance – for example the critical Uncertainty Toolkit which they have ignored. In the carbon cost case they have been forced to update the emission assumptions in the appraisal to reflect the Transport Decarbonisation Plan (TDP) following criticism at the DCO and the Panel's questions. However they have only used the part which benefits their case (faster EV take up), ignoring the traffic growth reductions which are embedded in the same TDP. We asked questions about the nature of the new test immediately we heard about it including an email the day after ISH2. This was never answered directly.</p> <p>The reason that excluding the lower traffic forecasts is important is that lower traffic growth means lower congestion and therefore less benefit and a lower BCR. This is why the low growth forecast supplied by NH has a significantly lower BCR. This is without allowing for the creation of more traffic by building the scheme.</p> <p>It is worth noting that NH say they accept that EV uptake will not deliver the TDP pathway on its own (Page 22, vi, R9.74). This is a major admission supporting our case that a TDP compliant scenario without the current road should have been tested. The omission of such a test is why we can say that use of faster EV take up to reduce carbon costs without including the part of the TDP which would damage the NH case is an inherently biased approach and is in our view unacceptable as evidence.</p>

	(v) Low growth scenario cannot reflect specific policies – it's based on proportional reduction in traffic demand	<p>We agree with this, but it is the best that we have due to the omission of a TDP based model run. We also agree with the implicit assumption that the model would need to be sensitive to changes in the attractiveness of walking, cycling and public transport in a way the current model clearly is not. Again this fact has taken some time to extract from NH.</p>
	(vi) NH agrees EVs will not be enough on their own but TAG database doesn't account for DfT's TDP. It also claims that TDP is aspirational future policy not current policy	<p>TDP is current policy and linked directly to Parliament's commitment to reducing carbon emissions in the 6th Budget as well Net Zero by 2050. In addition, spending is already taking place on schemes to deliver the TDP, with £2billion allocated for future years. To call it aspirational is completely wrong and misleading. It is no more or less aspirational than the Government assumptions on EV take up and the availability of charging points. On page 44 it is clearly assigned a crucial role for the next 5 years as both policy and the policy line - trajectory - for reducing carbon emissions: <i>'Projecting emissions out to 2050 is inherently uncertain, and technology, behaviour and policy development will continue to evolve. This is why we have committed to the next transport decarbonisation plan within five years, to ensure transport is on the correct pathway to achieve net zero'</i>. Beneath Fig 2 the trajectory diagram it states <i>'The uncertainty bands around projections reflect uncertainty on the form of final policy and uncertainties on future demand for road transport' ... 'Where feasible, uncertainty in projections reflects uncertainty on policy design, GDP, fuel prices, trip rates, and historic volatility in emissions. The range in the policy line declines as we move out to 2050, due to a higher proportion of zero emission vehicles.'</i> Clearly this document is about current policy. It is interesting that the TDP reflects uncertainty in a way compliant with its own advice in the Uncertainty Toolkit (i.e. the underlying parameters). There is significant work being undertaken by DfT on progressing on this, with involvement from NH and consultants including CPRE's, but none of this is reflected in this case. It is important because some of this work is ongoing but a significant amount pre-dates the submission of the NH documents to the DCO. As such NH needs to test its scheme against the trajectory. It should be noted that the uncertainty here is around the level of delivery, not the fact that delivery of lower traffic will take place.</p> <p>The UK Net Zero strategy confirms that such policies and programmes are now part of Government future planning. The Exec Summary says, <i>'This document sets out clear policies and proposals for keeping us on track for our coming carbon budgets, our ambitious Nationally Determined Contribution (NDC), and then sets out our vision for a decarbonised economy in 2050'</i>. Para 20 the sector targets <i>'help to drive change and to plan how we can remain on track to meet our targets'</i>. But elsewhere it says <i>'The uncertainties inherent in our 2050 scenarios also apply to our 2037 delivery pathway. It is designed only to provide an indicative basis on which to make policy and plan to deliver on our whole-economy emissions targets. The exact path we take is likely to differ and</i></p>

		<p><i>must respond flexibly to changes that arise over time</i>'. In planning a transport intervention of this size it is essential that the implementation of other interventions are included in its assessment. The NH argument appears to be that because of the scheme's timing such changes can be ignored. A relevant question might be, do NH accept that future schemes will have to follow the procedures we have called for? Our view is that they clearly would.</p>
	<p>Q3.3.NH does not address the full Right Mix policy – only the 5% reduction City to City car trips – or the urban location of the scheme No response to suggestion to adjust growth factors and matrices and run an option without road scheme</p>	<p>The Right Mix Strategy, which is being reviewed in light of new Government targets and the Pandemic, has been used by CPRE to inform the assessment of the CPRE alternative package. It is a good example of a variable demand forecast used to test alternative options that NH consider “unconventional”.</p> <p>Although offered in rebuttal, the NH response seems to confirm our view, that the vast majority of car trips in the model will be subject to demand reduction, not just through slower growth but in absolute terms. This has been the subject of previous submissions by CPRE, referring to the Right Mix Strategy.</p> <p>While it reproduces a relevant part of the Right Mix vision, NH's answer seems to imply that City to City trips are the most important for this scheme. However these trips are a very small percentage of the traffic forecast. We have undertaken a further calculation from the NH matrix data to confirm this point.</p> <p>If the total trips originating in the local area (Sector 1) and travelling to all 25 sectors covering the whole of Britain are the baseline, 94% of those trips go to immediately adjacent sectors. Excluding the rural Sector 7 from this produces 93%. All of these trips are therefore relatively short distance (relevant for non-rail mode switch) and in areas directly affected by the Right Mix policies.</p> <p>For convenience CPRE also reproduces the Right Mix chart. This shows a decrease in car trips of 6% for local neighbourhood journeys, 12% for the wider city region and 21% for trips connected to the regional centre. These are precisely the categories which form the vast majority of the trips most relevant to this scheme.</p>

Figure V2: "Right Mix Vision" change in volume of trips by mode for 'Now' and '2040', by spatial theme



NH have simply ignored the impact of these policies on their traffic forecasts. It should also be noted that no trip length distribution for the Mottram link has been supplied to back up the NH rebuttal. However, the matrix analyses undertaken by CPRE using NH data both the new one above and already submitted to the DCO show its importance.

That the scheme is not supportive of these modal changes is also shown by the vehicle kilometres finally provided by NH in answer to 9.75.6. It is worth noting that such basic vehicle kilometres data was originally requested by CPRE in March 2021. With the scheme there is an increase in traffic within the ADM of 84,000 veh kms in 2025 and within the local study area of 39,000 veh kms. Any increase in car trips is clearly not in accord with the GM Transport Strategy, and an increase in the local study area is particularly contrary to the Right Mix vision. This is in addition to the wide area re-routings which leads to increases in traffic leaving and entering the area of 26% at the M67 roundabout and 26% through the A628/A57 cordon in 2025. The equivalents for 2040 are increases of 27% and 29% respectively ((Figures 7.1 and 7.2 of the Transport Assessment Report).

	<p>Q3.4 Modal use assumptions and under-representation of public transport and active travel in the model</p> <p>NH quote their answer to WQ2 2.3.3 <i>'even if public transport and active travel modes have been under-represented in the model, which is not the case, then it would be unlikely to have a material impact on the assessment of the Scheme or the case for it'.</i></p>	<p>This dismissal of public transport should be of great concern to the DCO. One of the key points we have been trying to ascertain (see D6 submission) is what assumptions were made about public transport use in future years. Our understanding is that there is an assumption of slow decline but despite our requests there has been no data provided.</p> <p>We now know that public transport (apart from regional rail) and active travel are excluded from the modelling. Yet NH did not give any indication that they defined public transport as rail (apart from one footnote to the sector map in one worksheet) throughout the extensive correspondence and meeting minutes. The term public transport is always used and NH has continued to confuse the definitions between rail, public transport as a whole, trips which were included or not included in the model and in fact how the limited rail modelling was undertaken.</p> <p>This is clear from the automated transcript of ISH 2 and accords with our notes.</p> <p>At 25.26 Mr Buchan states that the totality of public transport does not appear to be in the model. Mr Katesmark responds that:</p> <p><i>"just to clarify that the model has taken account of public transport in that there is a separate model, that look multi modal model that was used at the initial stages. And the that does look at the public transport improvements in the area at the top at the time."</i></p> <p>He goes on</p> <p><i>" And the highways model that we've used is is an iterative model with that public transport model, that other multi modal model. So it does take account of them to some degree. It doesn't deal with buses in a specific detail, but in broad terms, it does take account of public transport."</i></p> <p>Some of this is not correct and it also implies another model being used for public transport. We have of course asked for details of this but none have been forthcoming.</p> <p>In fact this model was used for rail only and thus there is no bus in NH's multi-modal model. This has not yet been finally confirmed despite our efforts to get something agreed for a SoCG, for example the email sent on 16th March (as before we refer to public transport as a whole). Our best guess is that there is a separate coarsely zoned rail model but we await NH's response. This is yet another missing element concerning the basic structure of the appraisal which should have been clear at submission stage. The fact that the DCO is about to close and we still don't have such detail is not acceptable if normal standards of transparency are to be met.</p>
	<p>Q3.6 No further response beyond REP6-017 to CPRE's claim that we do not know the worst case scenario of impacts of traffic on Glossopdale (no</p>	<p>REP6-017 focuses on how drivers use the modelled road network. We do not know the worst case scenario since the Glossopdale roads have been excluded from the traffic model. Government guidance TAG Unit M3.1 (See extract below) specifically states that roads in residential areas <i>'especially rat runs'</i> should be assessed. It may be difficult <i>'but it is desirable that the effectiveness of</i></p>

	<p>baseline data, impacts on safety, community severance, air and noise pollution)</p>	<p><i>the scheme in attracting this traffic back to the main road network, is accurately assessed</i>'. At present the scheme is being modelled to take traffic away from the main road network A57 through Glossop and onto residential streets. The diversions off the A57 onto residential roads are significant – e.g. flows in 2025 DS diverted onto Dinting Road (1,400 AADT) from the A57 High Street West (11,250 AADT) represent 12% of the A57 flows. Their impacts must be fully addressed but do date they have not:</p> <ul style="list-style-type: none"> • The TAR Figure 3.7 shows that crashes were only modelled on the A57 and Hadfield road but on none of the other local roads. NH excluded residential roads because there would be no impact (3.7.4) but HPBC's Local Impact Report shows there would be an increased risk of crashes. • Severance is not addressed. • Classified turning counts for various junctions were taken but no baseline results are available. REP2-090 (pdf pages 498/790) refers to Appendix A PCF Stage 3 Transport Data Package (which is not available to us). DCC/HPBC's Local Impact Report para 7.7 refers to baseline turning counts in March 2018 (results were given to DCC 15th Oct 2021 according to REP1-042 RR-0240-2 NH's response to DCC's relevant rep). In the interests of fairness and transparency the baseline classified turning counts and results with the scheme should be made freely available to the Examination, and not just shared between two parties. • The air quality study ended at the junction of the A626 with the A57 and excluded the majority of Glossopdale. • The noise survey excluded all of Glossopdale apart from its western edge – a short length of Woolley Bridge Lane and Hadfield Road. <p>In addition NH in ISH 2 quoted IEMA traffic increases of 30% or greater are significant [Transcript ISH2, Session 2, 59.18]. Such levels are unacceptable guidance when the Government is promoting low traffic neighbourhoods (NPPF 2021 para 92).</p> <p>(TAG Unit M3.1 Highway Assignment Modelling, para 2.4.2 <i>'For a model created for a specific scheme, the network should include all main roads, as well as those secondary routes, and roads in residential areas (especially 'rat-runs'), that are likely to carry traffic movements which could use the scheme being assessed, either in the base year or in future years, and that are significant in relation to the capacity of the scheme. Modelling this 'rat run' traffic may present some technical difficulties, but it is desirable that the effectiveness of the scheme in attracting this traffic back to the main road network, is accurately assessed. Local highway authorities will normally be aware of the common</i></p>
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		<i>'rat-runs', but some independent assessment may also be required. In the absence of count data, accident plots may also give an indication of alternative routes that vehicles are using to avoid local congestion points'.)</i>
	Q3.7 NH is confident traffic modelling is robust	The key issue is whether it contains the right forecasting assumptions on traffic and mode split and whether the network is multi-modal and sufficiently fine grained in Manchester. It may be internally robust for traffic assignment but it is unsuitable for assessing travel as a whole.
	Q3.9 NH refers to REP6-017 to counter CPRE's arguments on the alternatives.	Our robust arguments on the alternatives are in REP2-069 pp7-10 and 13-18;
	Q 3.10 Further analysis of the Shaw Lane junction	We await the select link analysis proposed by DCC
	Q3.11.& 3.12 Average speed cameras are not part of the DCO	We have shown several times that promotion of them is as a consequence of scheme
	Q3.17 Bus routes and journey times - No further response beyond REP6-017	This has now been clarified – there is no bus content in the main model comparable to that for traffic, and, as far as we know, no bus content at all in the rail mode split model used for what NH called “public transport” as a whole.
	Q3.18 Sufficient consideration given to public transport networks? NH uses the most up to date traffic forecasts based on NTEM which does not account for Right Mix policies	Obviously NTEM is out of date, both from Right Mix but also TDP. Thus the scheme is based on out of date forecasts not reflecting new policies and programmes. It is acceptable, and normal practise in a context with high numbers of urban trips, to vary the trip rates from NTEM due to local factors and mode specific initiatives. NTEM forecasts are subject to uncertainty, especially when disaggregated to local zones or travel modes. Before using the NTEM forecasts, the following DfT guidance should be reviewed: TAG Unit M-4 Forecasting and Uncertainty NTEM Planning Guidance Unit M-4 is supplemented by the DfT Uncertainty Toolkit to which we have frequently referred and NH do not consider relevant.
PDNP	Q4.4 No response to import of NPPF 176 and 185 as, in error, we referred to REP4-016, not REP4-015	We mistakenly quoted REP4-016. Our arguments about NPPF paras 176 and 185 can be found in REP4-015
	Q4.5 NH do not agree that their interpretation of impacts on PDNP lead to material significance.	Appendix A in REP8-019 repeats the evidence already presented in Tables 7.29 and 7.32 in Es Ch 7 Landscape and Visual Effects. It fails to show how 'great weight' was applied in the assessment of indirect effects on the PDNP landscape and visual amenity. Traffic increases of 38% at count site 28

		and of 9% at count sites 25 and 28 (Figure 7.5, Transport Assessment Report) in the PDNP are material. NH are ignoring the potential for improvement from alternative policies.
	Q4.6 Refers to answers to ISH3 Item 3 to show bunching of traffic on Snake Pass would increase noise by 1.dB	This assessment does not take tranquillity in one of the wildest parts of the PDNP into account.
	Q5.11 Openness of the Green Belt - Does not address CPRE's arguments showing photomontages under represent impacts of the scheme - refers to ISH3 Item 7x	We await the local authorities response at Deadline 9
CLIMATE CHANGE	(i) No response to CPRE's outline of what carbon should be counted and cost	
	(ii) NH do not recognise our proposal for reassessment of carbon in response to WQ2 ISH Item c and d. Refer us to Appendix A	
	Q8.2 No legal requirement to assess carbon against regional or local targets. Refers to REP5-026 post ISH 2 comments	NPSNN 4.4 requires ' <i>environmental, safety, social and economic benefits and adverse impacts, should be considered at national, regional and local levels</i> '. The EIA guidance requires ' <i>The assessment should take relevant greenhouse gas reduction targets at the national, regional, and local levels into account, where available</i> '. Local and subnational SCATTER budgets and targets from the Tyndall Centre exist for TMBC, HPBC, GMCA SYMCA, SCC and TfN do exist as we showed in REP2-069. TMBC in REP2-056 response WQ1 8b) refers to GM 'reducing carbon emissions in line with Tyndall curve' and in REP6-027 response to WQ2 8.2 implies regional and local targets are important. An assessment should be undertaken against them.
	Q8.5 NH explain EFTv.11 does not take into account aspirations of DTP or NZ strategy. Sensitivity test takes both into account.	
REP7-034 Keith Buchan on behalf of CPRE Comments on submissions for Deadline 5 and 6		
1	No response to introduction	

2	NH explain meaning of car available; explicit about modal shift including rail only and not bus – latter would have negligible impact on traffic modelling	Modal shift to bus would not be negligible since TfGM aims for 50% of trips to active travel and public transport (bus tram train) by 2040. NH have not supplied the DM and DS forecasts for this date, which they must have, despite our specific requests for them. The Right Mix Strategy plans for increases in public transport use of 5% outside the regional centre and 60% for trips related to it. Bus trips would be very relevant for the types of journey being undertaken locally.
3	NH explain that public transport trips are missing because some journeys between sectors are not viable by rail	This is simply a reflection of the very limited way that public transport is included. It appears that bus trips cannot be included in the separate model that has been used because the zones are too big, i.e. most bus trips will be within the zones and not modelled on the network. This would mean that the zones could be at least 2 to 5 miles across. This point has not yet been clarified with CPRE despite our request. This is why we are concerned that the modelling used is not the same as that used for the scheme, particularly in the Area of Detailed Modelling. This is another technical issue which should have been clarified through engagement rather than the arms' length procedure insisted upon by NH.
4	NH explain that apparent asymmetry in the commute and home-based employers' business trips is a consequence of the way the matrices are structured (this is a model data entry requirement). The matrices provided are in Production Attraction (PA) rather than Origin Destination (OD) format such that an entry in row X and column Y denotes morning trips from home zone X and an equal number of return trips from zone Y later in the day. There is therefore no asymmetry	It is finally clear that NH have supplied the highways matrices in O&D format but not the PT Commute and Home based business matrices (which are in fact car available rail only). On the other hand, the non-work PT trips have been supplied in the O&D format. This is again an issue that should be the subject of technical discussion to clarify and agree.
REP7-035 Keith Buchan on behalf of CPRE Comments on Deadline 6 submission (REP6-033) Carbon		
1	NH does not agree with appraising alternatives v road scheme to recalculate carbon cost ; claim the difference would not be realistic	Appraising different policies and packages with different levels of traffic is a fundamental tool to assess what schemes to progress and which to avoid. There was no carbon objective when the scheme was developed and chosen in 2015. It was not tested for its carbon reducing impacts.

2	NH dismiss use of worksheet comparing DM low Growth and DS central growth as not a recognised methodology	This is a recognised methodology for testing different scenarios, including the Right Mix package which has less car traffic in it than the Business As Usual.
3	NH disagrees scheme is within a major conurbation because some distance from centre, semi-rural location in Longdendale and PDNP, well beyond M60 which encircles city	This claim has been disproved by the release of the matrices which show the majority of trips and benefits occur to traffic either completely within or with one end in Greater Manchester.
4	Re benchmarking carbon emission NH only used IEMA guidance to show GHG not geographically limited and spatial boundary is global see ISH3 Item 6 response	IEMA guidance does not support the NH case as set out in our submission REP7-035.
Appendix A	NH explains that EFT v.11 does not reflect government policy DTP; and how EFT calculation undertaken. No information on how NH did sensitivity test. Now quoting the background documents which we submitted (REP2-090) as part of their evidence	We now believe that the sensitivity test is incomplete and favours the scheme. However, the details we have asked for have not been supplied and the meeting we asked for has not been agreed to.