

A57 LINK ROADS TR010034

RESPONSE TO REP9-027 APPLICANT'S COMMENTS ON D9 SUBMISSIONS

CPRE Peak District and South Yorkshire

Unique Reference: 20029243

DEADLINE 10 – 5 May 2022

Fixed cost function and masking

9.79.21 We have shown that the model does not represent the impacts of the scheme on transport networks in Greater Manchester. The scheme has been treated as an isolated bypass with limited access to Greater Manchester, with a fixed cost function and a masking approach applied to Greater Manchester.

NH responded: *It should be understood that the fixed-cost-function approach to modelling has been applied only to areas outside of the core region of influence of the scheme, as represented in Figure 3-7 of the Transport Forecasting Package. This does not apply to the whole of the Greater Manchester area as has been suggested. The metropolitan boroughs of Tameside (except for the small section to the west of the M60), Stockport and the majority of Oldham are within the area of detailed modelling and fixed costs do not apply in these areas.*

We have taken Figure 3-7 showing the fixed cost function in REP2-090 page 289/790 and overlain the three borough boundaries (see figure below). From this we estimate that the fixed cost function was applied to the majority of Oldham, 20% of Tameside and 40% of Stockport boroughs and these areas were therefore excluded from the ADM. Thus NH's claim appears misleading.

To be clear what impact this has we explain the fixed cost function and the masking that NH applied to the model.

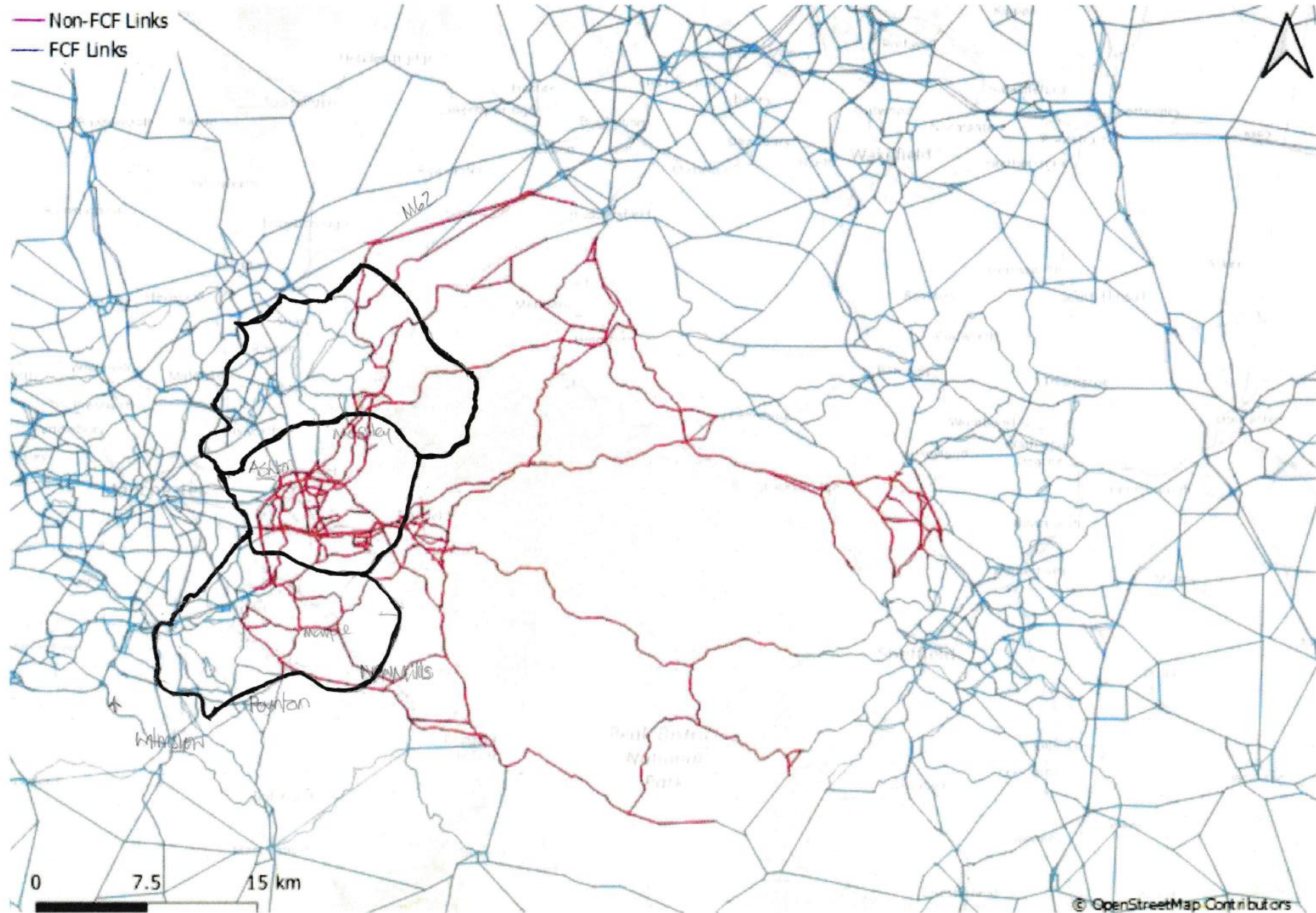
The scope of the model extends to the east and west coasts of England, contains a very high number of trips and hence a large overall cost of travel, making relatively small fluctuations in modelled behaviour, potentially influential on overall performance. To minimise this effect a fixed cost function (FCF) was applied [REP2-090 para 3.8 pdf page 287/790]. A cordon is set within the model and costs outside of this cordon are fixed to ensure uniform behaviour between the DM and DS scenarios. This has the effect of eliminating the cost differences caused by changing traffic patterns in those areas. Thus the extra 25% of traffic exiting the M67 roundabout doesn't impose extra costs on the Greater Manchester urban networks to the West. Despite use of the FCF the model was unstable. In order to reduce

what was called the model noise, a masking approach was adopted [REP2-090 para 4.5 pdf page 29/790].

In modelling there are sometimes areas which are far away from the scheme in question but subject to change and hard to stabilise (i.e. many model runs are undertaken and they do not tend towards a stable pattern). In these cases they are sometimes deliberately prevented from fluctuating, masking is the technique we are told has been used for the A57. However, in this case the masking is applied to a complex urban area with many journeys in it which use the proposed scheme. Previous CPRE analysis of the trip matrices has shown the high significance of these trips.

Validation of model performance was focused around the scheme area but excludes the really difficult parts of the network (complex urban) which nevertheless has most of the trips using it for a significant part of their journey. Although fewer trips have part of their travel within Sheffield, this has also been excluded from the detailed modelling. In terms of validation we would like to confirm that there is no all mode validation in combination with public transport. Walking and cycling are also missing from the model and its validation.

It is therefore clear that the way that NH has used the model has resulted in substantial exclusions from the assessment of the impacts of the scheme.



Safety objective

9.79.30 We noted that the safety objective for the scheme included in the 2015 Trans-Pennine Routes Feasibility Study and the 2018 consultation was removed for the 2020 consultation and DCO application.

NH response: *Following further consideration of potential solutions, the dualling of the A61 was separated from the A57 scheme and progressed separately, as was the package of safety and technology measures. The climbing lanes on the A628 between Tintwistle and Flouch were removed from consideration all together. As a result of this for the 2020 consultation the scheme objectives related to the safety and technology elements of the 2017 proposal were omitted from the 2020 consultation and from the scheme application as specific objectives.*

This is a complete misunderstanding of an objectives led assessment such as that used for Strategic level assessments (such as DfT EAST). NH have removed a widely accepted and legitimate objective – road safety – because one of the ways in which it might be achieved has been excluded from the current scheme. Road safety remains a legitimate and important objective and the proposed scheme has a negative impact upon it instead of achieving improvement. To seek to minimise this by diluting the objective creates an obvious bias in the appraisal and allows NH to underplay the importance of the increased of accidents and the injuries which would result.

In fact, the scheme would cause diversion of traffic off the safer M62, with increased accidents on the A628T and A57.

Green Belt

9.79.53 NH is using conflicting arguments to claim the scheme is ‘not inappropriate’ development in the Green Belt.

On the one hand it claims the scheme is local transport infrastructure and therefore permissible development in the Green Belt.

On the other hand NH does not accept the policy commitments to which local transport infrastructure is subject. When claiming how the scheme supports the GMCA Right Mix policy NH ignores the requirement for reduction in car trips and 50% increase in public transport and active travel by 2040, and implies that City to City trips are the most important for this scheme. However, these trips are a very small percentage of the traffic forecast as we showed in REP9-040 Q3.3. The vast majority of the trips most relevant to this scheme are local neighbourhood journeys, wider city region journeys and trips connected to the regional centre.

