A57 LINK ROADS TR010034

RESPONSE TO NH REP10.010 COMMENTS ON DEADLINE 9 RESPONSES

CPRE Peak District and South Yorkshire
Unique Reference: 20029243

DEADLINE 11 – 11 May 2022

Response to NH 10.1 and 10.2

1 Forecasts and BCRs

NH say that a BCR test using high carbon cost and low traffic (and vice versa) are "highly unlikely scenarios" and "a fraction of a fraction of a probability of occurrence." This is simply wrong – a situation where climate change is causing problems to the world economy sooner than expected is exactly one where the cost of reducing carbon would be high, due to the additional quantities which would have to be avoided. The marginal cost of reducing carbon emissions is lowest for the easiest measures (sometimes called "low hanging fruit"). As more and more carbon reductions are required, the cost rises. In the case where reductions are not enough the idea of carbon capture may come into play, where costs are significantly higher (if it can be made to work). This is pretty much accepted by most economists and it is surprising that NH don't understand this point at all. High carbon reduction cost and climate change damage to growth is clearly possible and some would say likely. It should be noted that the low growth and high carbon cost figures are actually within fairly narrow bands and assume reasonable success in tackling climate change.

However, there is a bigger point which NH also seem to be avoiding. Scenario forecasting and dealing with uncertainty was already recognised by DfT and used to guide their national forecasts since 2015. This has been in relation to factors such as how much people travel, whether the economy grows, and how much fuel costs. Different combinations are tested to explore uncertainty in a meaningful way. This is very well put in the Road Traffic Forecasts 2018 as follows:

"4 Understanding future demand for road travel is essential to shape the policies we implement and the investments we make. However, forecasting future demand is complex and there is significant uncertainty about the extent to which existing trends and relationships will carry on into the future. We need to ensure that we understand and communicate this uncertainty.
5 Within these forecasts, a scenarios approach has been taken to construct a number of different plausible future outcomes. This provides a strategic view of key uncertainties that might impact on future road traffic and supports the design of strategies and policies that are resilient to these uncertainties.
6 These forecasts are not definitive predictions about the future, or desired futures, but show how demand for road travel may evolve assuming no change in government policy beyond that already announced. These forecasts have been produced using a broad range of research, evidence and data focusing on:

- *Our understanding of how people make travel choices*
- *The possible paths of key drivers of travel demand"*

One of our key arguments has been that uncertainty is even more important than in 2018 and the certainty of the impact of climate change makes scenarios in which it plays a major part even more important.

2 Where are the costs and benefits?

On the issue of where the costs and benefits of the scheme really occur, this is a major area where there is still a lack of clarity and sometimes basic information. This makes production of an SoCG on this area very difficult.

The first question is on fixed costs. Without discussing "perturbation assignment" in SATURN modelling which NH refer to, there needs to be some clarity on this.

First it appears that NH are claiming that traffic in Central and Western Manchester is hardly affected by the scheme. They mention Denton and Hyde (para 10.2.6). The NH figures in the original TA show a 26-27% increase in the flows on the M67 caused by the scheme. This passes through Denton and is highly relevant to journeys starting or finishing in Denton and Hyde, the two places NH claims would be unaffected. The modelling does not include the delays caused by increased flows in the fixed cost area. This is clear where NH say
"The term "fixed" relates to the flow-delay function for each turn at each simulated junction."
What this means is that if traffic increases at one of these junctions in the fixed cost area it does not impose the extra congestion costs on the traffic passing through it which would be imposed in the Area of Detailed Modelling. Masking also has the effect of removing some cost changes. The overall impact was shown in our earlier submission but this has the effect, for example, of producing zero change in costs for trips within Central, Northern and Western Manchester. This is simply not credible.

The second point is that NH do not use alternative figures in this section to rebut the CPRE calculations. It is accepted that these are not perfect because the matrices lack some detail. For NH to criticise CPRE because they did not supply CPRE with sufficiently detailed data is somewhat galling considering that some data is outstanding from our requests dating back to March 2021.

However, NH have supplied some estimates of their own (again with no details). For example, in REP5-022 para 9.64.54, NH say
"*Of the total travel time benefits delivered by the Scheme, approximately 6% comes from trips between Manchester and Sheffield. A further 10% comes from trips which start or end in Manchester or Sheffield with the other end of the trip in the corridor between them. The bulk of the remaining benefits are for more local journeys in the vicinity of the Scheme"*

This appears very similar to the CPRE trip data they are attempting to rebut in the new submission. Again in RE9-027, para 9.74.21 NH say
"Based on a best fit using these sectors approximately 70-75% of benefits relate to trips to, from or within the Greater Manchester area, with 25-30% of the total benefit generated by trips entirely within Greater Manchester. However, due to the specification of these sectors, these figures include trips to and from Glossop, which is outside of Greater Manchester."

This seems very close to the calculations CPRE submitted at Deadline 4 and 5 and confirms the point that the majority of the scheme's benefits to travel by road is in a conurbation subject to demand management policies and programmes with clearly predicted outcomes for traffic reduction. They thus undermine those outcomes by negating the effect of schemes to attract drivers from their cars. Our view is that the earlier figures reveal that NH have not and cannot deny that the majority of scheme benefits are in Greater Manchester.

3 CPRE specific responses to 10.2.7 to 9.

10.2.7: While Glossop is not within Greater Manchester, many of its trips will be related to the conurbation. The impact is unlikely to be significant but again illustrates the lack of basic information provided by NH.

10.2.8: This relates to the supply of matrices in either O&D format or Production and Attraction (P&A) format. This has also been a difficult area because NH appear to have supplied some matrices in O&D, and some in P&A. Had a direct technical dialogue been permitted by NH with their modellers this issue could have been resolved. Questions remain unanswered and this will limit what can be included in an SoCG.

10.2.9: This asserts that CPRE has over-estimated trips affected by the scheme. It provides no alternative in this rebuttal, but earlier rebuttals show that their own data confirms the basic point as above.

4 Rebuttal to detailed NH Responses to CPRE PDSY REP9-040

9.82.2: The BCR and use of scenarios to engage with uncertainty is covered in the response to 10.1 and 10.2 (above). The additional NH point, that "there is currently no published or agreed advice for scheme assessments of projects for the Applicant to refer to" is simply incorrect. TAG Unit M4 has considered uncertainty for some time and currently refers to the Uncertainty Toolkit which has a great deal of relevant material.

9.84.5: The very brief NH statement that *"The modelling of public transport…. is proportionate in relation to the assessment of the scheme"* is both vague and misleading. It does actually rebut the CPRE statement. No reply has yet been received to our request for details of the rail/road modelling. In relation to bus, we have attempted to word something for an SoCG and to the best of our knowledge (and what was said at ISH3) no bus mode switch is available in the model.

9.84.6: NH say they have used *"the most up to date and recognised DfT traffic forecasts."* The latest DfT forecasts are in fact scenario based and refer to the importance of uncertainty in forecasting as well as modelling. (The scenario forecasting started in 2015 at the time of scheme appraisal and was revised in the 2018 DfT forecasting document.) Again the response does not deal with the points about the latest DfT guidance (TAG M4 and Uncertainty Toolkit).

5 Rebuttal to detailed NH responses to CPRE REP9-042

9.84.10: NH here repeat the mistake of treating the scheme as though it is in an isolated rural area, despite their own data showing the main impacts or on local and Greater Manchester traffic. This is further illustrated in the CPRE response to 10.2.

9.84.11: NH have clarified the SRN designation point but ignored the more important one: that traffic would be transferred from Motorways to single carriageway parts of the SRN. This is what seems to cause the increase in accidents. While the distance travelled is longer (on the motorways), the accident rates are far lower.

9.84.13: NH argue that they do not need to revisit the Strategic level assessment, which is based on an option sifting process. This is incorrect since guidance states that the Strategic Case must be reviewed at each stage of the appraisal process and this should have been done once the Economic Case was drafted. For example, the Treasury Green Book Guide from November 2020 says it is needed at Outline Business Case (pages 43-44) and should confirm the short list. As far as the DCO submissions are concerned, this has not been done.

Overall NH have not dealt directly with the issues raised and in some instances offer assertions which do not seem to rebut CPRE's analysis.