

A57 Link Roads

TR010034

**9.91 Applicant's response to the letter to
the Examining Authority from Interested
Parties submitted at Deadline 10**

Rule 8 (1)(k)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

May 2022

Infrastructure Planning

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A57 Link Roads

Development Consent Order 202[x]

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1. Introduction

- 1.1.1. This document provides the comments of the Applicant, National Highways, in response to the REP10-017 CPRE Peak District and South Yorkshire on behalf of Andrew Boswell, Anne Robinson, Anthony Rae, Chris Broome, Daniel Wimberley, Helen Rimmer, Linda Walker, Peter Simon, Richard Dyer, Laura Stevens Submission made at Deadline 10.
- 1.1.2. National Highways has sought to provide comments where it is helpful to the Examination to do so. National Highways has not responded to every submission for instance, because the submission was very short, or because it contained expressions of opinion without supporting evidence. Where National Highways has chosen not to comment this is not an indication National Highways agrees with the point or comment raised or opinion expressed.

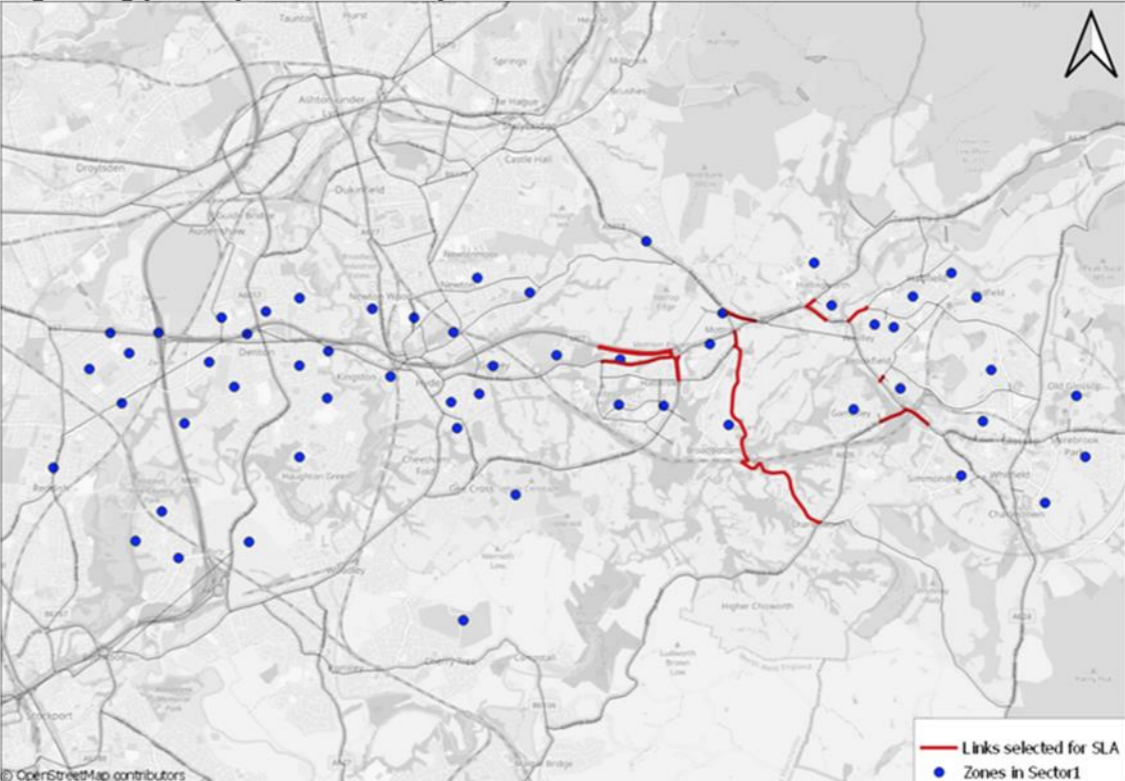
2. REP10-017 CPRE Peak District and South Yorkshire on behalf of Andrew Boswell, Anne Robinson, Anthony Rae, Chris Broome, Daniel Wimberley, Helen Rimmer, Linda Walker, Peter Simon, Richard Dyer, Laura Stevens - Letter to the Examining Authority from Interested Parties

Reference	IP Issue	NH Response
9.xx.xx	<p>Dear Messrs Cowperthwaite and Dyer,</p> <p>We, the undersigned, are a group of leading objectors at this Examination. You have led the examination process with a genuinely inquisitorial approach, however as things stand, we are concerned that any report to the Secretary of State will lack the necessary evidential base. Information which is clearly important and relevant, and which is needed to inform your recommendations to the Secretary of State on the balance between the adverse impacts and the benefits of this scheme, has not been made available to this Examination by the Applicant. It has therefore not been scrutinised and challenged to ensure that it is robust. We are, therefore, writing to ask you to take action to ensure the integrity and soundness of this Examination.</p> <p>We contend the evidence base as it stands fails to meet legal, guidance and policy requirements according to the Planning Act 2008, the 2017 EIA Regs and Guidance, National Highways Licence agreement, Transport Decarbonisation Plan, Bus Back Better, Gear Change, Greater Manchester Right Mix policy, WebTAG Appraisal, IEMA guidance and NPSNN. And as the Applicant has failed to meet the obligations placed on it as a public body by the Gunning and Nolan principles, and the Aarhus Convention, the process using the evidence has not been open and fair to the public.</p> <p>There are three matters of concern: the traffic model, the omission of a WebTAG compliant Transport Appraisal, and the carbon assessment. We look at these in turn.</p>	
	<p>THE TRAFFIC MODEL</p> <p>The outputs of the traffic model, i.e. the predicted traffic flows and their distribution, nature and composition, are fundamental to all the evidence about the scheme's effects on the transport networks, on road safety and on the environment and society. The model therefore occupies a central position at this Examination, and it follows that you as Examiners must have total confidence in these outputs. The enormity of the problems with the model spelt out below must challenge that confidence.</p> <p>Neither the scenario with the scheme in place ('do-something') nor the 'do minimum' without it are in line with local and national policy. Neither of these scenarios can meet the requirement for transport decarbonisation as set by Greater Manchester Right Mix policy, Bus Back Better, Gear Change, the Net Zero Strategy and the Transport Decarbonisation Plan (TDP): essentially emissions go on increasing with both scenarios, and there is no clear delivery mechanism for decarbonisation in either. Only a sustainable package implemented without the current scheme in place ('do-something-else'), that is designed to secure the</p>	<p>As set out in response to Applicant's comments on Deadline 8 submissions (REP9-027), item 9.79.50 National Highways maintains that the Scheme does not affect the UK's delivery of the Net Zero Strategy and will not have a material impact on the ability of Government to meet its legally binding carbon reduction targets, and therefore meets the requirements of the National Highways Licence. The Net Zero Strategy sets out target-compliant "indicative delivery pathways" for each sector until 2037. The indicative delivery pathway is designed according to "our current understanding of each sector's potential, and a whole system view of where abatement is most effective". It is a full cross-sector strategy that has implications for consumer behaviour around modal shift, which in turn is linked to incentives to encourage the use of cleaner transport modes. Policymakers need to facilitate incentive schemes to support the behavioural change required to reach the net-zero target, including regulations, pricing, subsidies and incentives (e.g. for electric vehicle purchase). There is still a need for 'fit-for-purpose' infrastructure that is designed with a sense of place, and encourages active travel, which is what the Scheme achieves. The Scheme also has a Carbon Management Strategy and associated Carbon Management Plan in place to cut carbon from the construction stage. In a statement released by Transport Secretary on 14 July 2021, when the Transport Decarbonisation Plan (TDP) was published, he explained that the new plan "is not about stopping people doing things: it's about doing the same things differently... We will</p>

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	<p>required policy objectives, would have the potential to provide the required policy delivery mechanisms and meet that requirement.</p> <p>Without such a realistic 'do-something-else' the Examination will fail to meet the challenge of assessing the scheme in this time of rapid policy change. We are confident that the suggestion which we make in this letter for an independent review process of the model falls within your ExA discretionary powers.</p>	<p>still drive on improved roads, but increasingly in zero-emission cars". The TDP intends to cut traffic growth through other measures, such as those to improve walking and cycling infrastructure and behavioural changes to facilitate a modal shift. The Applicant's response to question 8.8 of the Examining Authority's Second Written Questions (REP6-017) provides examples of how the Scheme is aligned with this approach for the operational stage.</p> <p>In granting development consent for National Highways' M54 to M6 Link Road scheme on 21 April 2022, paragraph 35 of the Decision Letter states: "<i>The Secretary of State notes that the scheme will result in an increase in carbon emissions but that the view reached by the ExA is that it will not be so significant that it would materially impact on the ability of Government to meet its carbon reduction targets (ER 15.3.11). The Secretary of State does not consider that net zero means consent cannot be granted for development that will increase carbon emissions. The Secretary of State considers that, as set out in paragraph 5.18 of the NPSNN, it is necessary to continue to evaluate whether (amongst other things) the increase in carbon emissions resulting from the Proposed Development would have a material impact on the ability of Government to meet its carbon reduction targets.</i>"</p> <p>The Applicant considers this to be relevant the Scheme is comparable to the M54 to M6 Link Road as its contribution will not have a material impact on the ability of Government to meet its legally binding carbon reduction targets.</p> <p>With regards to 'The Right Mix', as set out in Applicant's written Summary of Issue Specific Hearing 3 (REP8-019), item 9.75.12, it is important to record that the "Right Mix" vision within the Strategy, sets out how modal trips are to be allocated using spatial themes, to secure an overall vision of 50% of trips to be made by sustainable modes. In relation to City-to-City trips, the Strategy acknowledges that active travel is not a realistic alternative and is targeting a 5% reduction in car mode share (page 84) from 87% currently to 82% by 2040. The data supporting the Right Mix vision is presented in the Technical Note, which is appended to the Strategy and relevant extracts relating to City-to-City trips are provided below.</p> <p>Moreover, the Greater Manchester Five Year Transport Delivery Plan 2021-2026 (2021) states "<i>Greater Manchester's network of motorways and trunk roads (forming part of the national Strategic Road Network) is managed by Highways England. Over the next five years, we will continue to work with Highways England to tackle congestion and deliver improvements to the network...</i>" (paragraph 167). It also states "Trans-Pennine Road Connections: Highways England will shortly be delivering the Mottram Moor and A57(T) to A57 Link Roads, as part of a package to improve Trans Pennine road connectivity between Greater Manchester and South Yorkshire" (paragraph 170).</p> <p>Additionally The Greater Manchester Five Year Transport Delivery Plan 2021-2026 'Appendix A: List of Interventions' contains a table headed "<i>In the next five years, we are committed to delivering...</i>". On page 85 this table identifies Mottram Moor and A57(T) to A57 Link Roads as an intervention that TfGM is committed to delivering, and gives the rationale as follows "<i>As part of the wider Trans-Pennine Upgrade, to reduce journey times and improve reliability between the Greater Manchester and Sheffield City-Regions, reduce traffic impacts on local communities and improve safety</i>".</p>

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		<p>As set out in response to Applicant's comments on Deadline 8 submissions (REP9-027), item 9.79.30, with regards to buses, National Highways' aim is to maintain all the existing bus routes on existing roads as they already provide services to the areas within the Scheme area. The proposed new carriageways are not expected to be used by any services as the aim of the new roads is to provide alleviation of traffic congestion along the existing routes. Less traffic along the sections of the A57 Hyde Road, and Woolley Lane will benefit bus reliability and speed, the details of stop provisions will be undertaken further with TfGM and DCC as part of detailed design, particularly as there are proposed changes to operation of the bus routes and infrastructure with TfGM taking greater ownership of this process.</p>
	<p>Problems with the model These include: 1. Assumptions and factors which are built into the model and the values ascribed to these factors are not available to stakeholders or to the ExA. For example 'The underlying assumptions that have been made in the traffic modelling to create the diversion of traffic onto Shaw Lane/Dinting Road are not clear' [HPBC Local Impact Report REP2-046 19.1]</p>	<p>The traffic model assigns traffic to the road network based on the most beneficial route for the user, in terms of lowest user cost, and adjusts this through numerous iterations of the model until model equilibrium is reached. The user cost is calculated from a combination of journey time (value of time) and vehicle operation costs that are based on Department for Transport's (DfT) standard published values of time and operating costs for different road user classes. The journey times in the traffic model are derived from a combination of vehicle speeds along links and junction delay. The traffic model dynamically adjusts journey times in response to changes in traffic demand which in turn dynamically alters the assignment or routing of traffic to the road network. The model automatically undertakes a series of iterations until model equilibrium is reached. The modelled baseline traffic flows and journey times are calibrated and validated against observed data to ensure that it accurately reflects the operational performance of the existing road network so that the model can be used as a sound basis for the development of the future forecast scenarios.</p> <p>Therefore, the assignment of traffic to the road network for the future scenarios forecast by the traffic modelling accurately reflects the way in which traffic respond to changes in the operational performance of the road network due to both forecast increases in demand and physical alterations to the road network.</p> <p>Consequently, National Highways are confident that the traffic model used to assess the Scheme accurately forecasts the route choice for traffic through Glossopdale, including along Dinting Road and Shaw Lane. As set out in their responses to the Examining Authority's Third Written Questions (Written Question 3.11) at Deadline 11, both Derbyshire County Council (REP11-012) and Tameside Metropolitan Borough Council (REP11-018) stated that they had no remaining concerns with regards to transport networks and traffic.</p>
	<p>2. The model may be based on a methodology, long applied by the Applicant on schemes for traffic assignment, but it is unsuitable for assessing travel as a whole in the context of new policy such as the national Transport Decarbonisation Plan (TDP), Bus Back Better, Gear Change, and Greater Manchester's Right Mix.</p>	<p>National Highways has developed, calibrated and validated the traffic model used to assess the Scheme in full accordance with the Department for Transport (DfT) Transport Analysis Guidance (TAG) and has utilised the most up to date traffic forecasts applicable at the time. No alternative approach to the forecasting, modelling and assessment of the Scheme that is recognised or endorsed by DfT is currently available.</p>
	<p>3. Public transport, walking and cycling have been excluded from the model although they are important policies in the TDP, Bus Back Better and Gear Change. The 'multimodal model' included only regional rail for those with access to a car, excluded buses and, on the information supplied so far at ISH3, did not provide a fine-grained assessment of public transport and active travel.</p>	<p>The modelling used to assess the Scheme is appropriate and proportionate regarding the inclusion and consideration of both public transport and active travel. Please also refer to the Applicant's written Summary of Issue Specific Hearing 3 (9.75.14 – REP8-019).</p>
	<p>4. Greenhouse gases have been calculated from only one of many different possible architectures, or configurations, of the traffic model and other road and land-based developments in the study area. The configuration used is orientated to assessing road</p>	<p>The cumulative effects assessment considers the net changes in carbon emissions resulting from the Scheme by comparing changes in the road traffic on the Strategic Road Network and local road network between the 'without scheme scenario' (the future baseline for</p>

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	<p>network performance [REP8-029/7.5]. However, it is flawed in two key respects for greenhouse gas emissions assessment: first, it does not provide an accurate quantification of the scheme in isolation, and second, it does not provide any quantification of the cumulative carbon emissions, including from other road and land-based developments: therefore, the application is not compliant with the EIA Regulations [REP8-029]. Soundbites such as the traffic model is “inherently cumulative”, or is “compliant with DMRB”, do not make the environmental statement compliant with the EIA Regulations on cumulative carbon emissions assessment. It is now time for the traffic model to be run in the configurations which will enable EIA Regulation compliance, and as set out in REP8-029.</p>	<p>assessment) and the ‘with scheme scenario’. The future baseline takes into account all other likely developments and traffic growth factors; it is therefore inherently cumulative. This is acceptable because the likely developments and the future traffic growth are likely to influence the area that has been included in the assessment for in both scenarios that have been considered. It is unrealistic to consider a scenario with the Scheme in isolation, because the scenario is unlikely to occur. The likely developments included in the traffic model are not connected to, nor require the Scheme to enable the developments. They can therefore go ahead with or without the Scheme, and as so should be factored into both scenarios. National Highways are not assessing the changes in emissions attributable to other developments or schemes.</p> <p>Furthermore, if a ‘solus’ scenario was to be undertaken so the future baseline without Scheme scenario did not take into account all other likely developments and the ‘with Scheme without other likely developments’ was compared against this baseline, the quantification for net change in carbon emissions resulting from the Scheme would still be the same, so the conclusion would therefore be the same.</p> <p>The ES chapter is not intended to be in accordance with IEMA guide on Assessing Greenhouse Gas Emissions and Evaluating, which was not published at the time of the DCO submission and is not the methodology that National Highways currently adopts. However, the scenarios that have been assessed within the Applicant’s assessment is considered to be in line with reporting set out within section 7.3 of the IEMA guidance page 31 “What should be included when reporting on GHG emissions within an ES chapter” (The full IEMA guidance document is included in REP8-032).</p>
	<p>5. The Uncertainty Log is incomplete according to DfT’s Uncertainty Toolkit. The Applicant claims to have followed the spirit of it by using TAG Unit M4 but has not dealt with the source of errors in terms of model parameters and specification. The list of new developments is incomplete, and the number of trips generated and included/ excluded from the model has not been presented. There will be long term changes in travel following the Covid pandemic which are uncertain (e.g. less commuting) and these should be addressed in the Uncertainty Log.</p>	<p>The Uncertainty Log was compiled in liaison with the relevant local planning authorities to ensure that it correctly included all planned developments and their status at the time. It is normal practice to list in the uncertainty log only the uncertainties related to future planned developments and infrastructure. Although not listed in the uncertainty log, uncertainties in the model parameters are collectively captured in the high and low growth sensitivity tests that have been undertaken to consider the impact of uncertainty on the forecast user benefits of the Scheme. This provides a range for the benefit cost ratio (BCR) of the Scheme to ensure that it offers value for money should traffic forecasts be higher or lower than the central case due to uncertainty.</p> <p>The Uncertainty Toolkit was first introduced in May 2021 which postdates the development and assessment of the Scheme. Much of the Uncertainty Toolkit has still not been adopted as official guidance and several aspects of it are dependent on an updated version of the DfT’s National Trip End Model (NTEM), which has not yet been published. Nonetheless, the Uncertainty Toolkit specifically states that the low and high demand growth scenarios may still be used where it’s considered proportionate.</p> <p>The Covid-19 pandemic postdates the finalisation of the Uncertainty Log which needed to be completed prior to the traffic forecasting and modelling undertaken for the assessment of the Scheme. Nonetheless, National Highways considers that uncertainty regarding the impact of the Covid pandemic on future travel patterns and behaviour is adequately covered by the low and high growth sensitivity tests that have been undertaken in accordance with Department for Transport (DfT) Transport Analysis Guidance (TAG) applicable at the time.</p>

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	<p>6. Refinements were made to the model during development of the scheme in order to avoid air pollution in Tintwistle and Dinting Vale AQMAs, and along Glossop High Street West, becoming an issue. The pollution with the scheme would have been of such severity that it was considered that it would jeopardise development consent. These model refinement steps could have led to the anomalies in the outputs listed in 9 below.</p>	<p>The refinement to the traffic model was undertaken to ensure that the alternative routes (rat-runs) to A57 through Glossop are accurately reflected in the model. In addition, updates to the traffic model were made to reflect changes to the scheme design, the latest Road Traffic Forecasts (RTF18) and changes to the certainty and timescales of other schemes and developments. The refinement of the model was not undertaken to avoid air pollution in Tintwistle and Dinting Vale AQMAs.</p>
	<p>7. 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 approach¹ applied to Greater Manchester including to the majority of Oldham, 20% of Tameside and 40% of Stockport boroughs². This is despite the majority of journeys being within Greater Manchester.</p>	<p>The model does include Greater Manchester, but at a lesser level of detail than within the Area of Detailed Modelling (ADM). It does, therefore, reflect the changes in traffic flows within Greater Manchester due to the Scheme.</p> <p>The changes in journey times for all trips between the zones in Sector 1 of the model (shown as blue dots on the plan below) and for all trips that pass along roads that feed into the Scheme (shown red on the plan below) to and from all zones within the model are accounted for in the assessment of the benefits of the Scheme, i.e. journey time savings.</p> <p>Section 7 of the Transport Assessment Report (TAR) (APP-185) only presents a high-level overview of journey time changes on select key routes and does not present all the journey time savings accounted for in the assessments of the benefits of the Scheme.</p> <p>Please also refer to National Highways response reference 9.54.64 in its comments on Keith Buchan on behalf of CPRE PDSY deadline 4 submission (REP5-022) regarding journey times improvements between Sheffield and Manchester delivered by the Scheme.</p> <p>Please refer to National Highways' comments on Deadline 5 responses (9.69.4 – REP7-025) regarding journey time reliability.</p> 

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	<p>8. Data from various sources was used to calibrate the model but how the data has been applied has not been fully explained or given in sufficient detail. Comprehensive baseline traffic flows from 2015 have not been supplied and the use of data from DfT has been dismissed as unreliable. On the one hand we are told the 2015 model was not updated as any new 2020/21 data would be atypical because of the pandemic but on the other told that additional data (automatic turning counts, classified turning counts, signal data, journey times) was collected in 2020/2021. The Applicant now claims the data was historic from 2015-20183. We are told, but not shown, that hourly flows have been extrapolated to produce the AADT flows. The results of traffic surveys undertaken during 2015/16 have not been presented to the Examination but appear to have been shared with local authorities. Full technical dialogue directly with the modellers has been denied. All this means we have extremely limited and conflicting data with which to understand the model outputs. Blanket assurances of the confidence that the Applicant has in its own work is no substitute for open, comprehensive and consistency presentation of data.</p>	<p>The development, calibration and validation of the traffic model has been undertaken in full accordance with the Department for Transport's (DfT) Transport Analysis Guidance (TAG) applicable at the time and passed the necessary TAG criteria for validation which must be met to ensure that the baseline model accurately represents the operation of the existing road network. The traffic model has also been subject to a rigorous National Highways quality assurance process undertaken by a team completely independent of the A57 Link Road project team.</p> <p>The traffic model has been calibrated and validated using a combination of traffic surveys specifically commissioned in 2015 and National Highways TRIS data on the Strategic Road Network (SRN). TRIS data is collected by automatic traffic counters that continuously record traffic flows 24-hours a day, all year round. Traffic data for weekdays during 'neutral' months (as defined by Department for Transport (DfT) and representing typical conditions outside of school holidays) is extracted from TRIS and used for the calibration of the model. The specifically commissioned traffic counts were undertaken on weekdays during a 'neutral' month. Also please refer to the Applicant's written Summary of Issue Specific Hearing 3 (9.75.9 – REP8-019).</p> <p>Regarding data gathered during 2020/21, please refer to the Applicant's comments on Deadline 8 submissions (9.79.111 – REP9-027).</p> <p>National Highways has held several virtual meetings with Keith Buchan that were attended by representatives from the traffic modelling team.</p>
	<p>9. Unexplained inconsistencies in the outputs from the model:</p> <ul style="list-style-type: none"> • Spurious AADT flows which remain unexplained along Glossop High St. West, Glossop High St. East and along the A628T between Hollingworth and Tintwistle. The first and the last of these could relate to the model refinement to avoid air pollution with the scheme; • Implausibility of the Applicant's explanation for 7,500 additional vehicles per day in DS 2025 compared to DM at the M67 J3/J4; • The extraordinary difference in the figures between modelled DM 2025 AADT flows compared to DfT 2019 AADT flows and/or to trends in DfT AADT flows between 2015 and 2019; • The additional forecast flows on the Shaw Lane/Dinting Road rat run are insufficient to explain the predicted reduction in flows on Glossop High Street West. 	<p>The traffic flows on the A628 Market Street through Hollingworth are higher than the traffic flows on the A628 through Tintwistle because of a combination of the additional traffic demand generated within the urban areas of Glossop, Hollingworth, Tintwistle and Hadfield, the way this traffic demand is loaded onto road network in the traffic model via a single zone loading point and due to much of the traffic demand being to and from the west.</p> <p>The reasons for the differences between the modelled traffic flows and the DfT count point traffic data for the roads identified in the Table in REP8-034 is provided below:</p> <ul style="list-style-type: none"> • A57 Woolley Lane: local fluctuations due to zone connector/local traffic representation limitations. • A626 Glossop Road: DfT count site is much further West and is not directly comparable, hence the lower DfT count recorded. • A6016 Primrose Lane: Growth is expected and may be a result of congestion on Glossop High Street. • A57 High St West: Long link which means exact location of count difficult to replicate given local zone loading limitations • A57 High St West: Long link which means exact location of count difficult to replicate given local zone loading limitations but modelled flow presented in table is further West, closer to Norfolk Street/Victoria Street junction than the DfT count point.

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		<ul style="list-style-type: none"> • B6105 Norfolk Street: The DfT count is for Hall Meadow Road which is a c-class road, so incorrect comparison with modelled flows. • A57 Snake Pass: Base flow is slightly low when summed over an AADT period but passed the hourly comparison criteria. Limited growth expected given other network constraints reaching this point. • A560 Stockport Road: Believe the count site is between M67 and Ashworth Lane whilst the model flow is south of Ashworth Lane. <p>Also please refer to National Highways' comments on Deadline 5 responses (9.69.114 - REP7-025).</p> <p>The traffic model has been calibrated and validated using a combination of traffic surveys specifically commissioned in 2015 and National Highways TRIS data on the Strategic Road Network (SRN). TRIS data is collected by automatic traffic counters that continuously record traffic flows 24-hours a day, all year round. Traffic data for weekdays during 'neutral' months (as defined by Department for Transport (DfT) and representing typical conditions outside of school holidays) is extracted from TRIS and used for the calibration of the model. The specifically commission traffic counts were undertaken on weekdays during a 'neutral' month. Also please refer to the Applicant's written Summary of Issue Specific Hearing 3 (9.75.9 – REP8-019).</p> <p>The development, calibration and validation of the traffic model has been undertaken in full accordance with the Department for Transport's (DfT) Transport Analysis Guidance (TAG) applicable at the time and passed the necessary TAG criteria for validation which must be met to ensure that the baseline model accurately represents the operation of the existing road network. The traffic model has also been subject to a rigorous National Highways quality assurance process undertaken by a team completely independent of the A57 Link Road project team.</p> <p>Furthermore, the assessment of the Scheme is based on a comparison of the Do-something scenario (with the Scheme) to the Do-minimum scenario (without the Scheme). If the traffic modelling has underestimated baseline traffic flows (which National Highways is confident is not the case), then this would equally apply to both the Do-minimum and Do-something scenarios and consequently, the comparative impact of the Scheme would most likely be very similar.</p>
	<p>10. The Applicant plans to 'update' the model with respect to the incidence of crashes on the Snake Pass at the detailed design stage so there will be no accountability through the Examination. DCC and the Applicant [REP9-020 SoCG] have agreed that 'It is possible that the appraisal overestimates the forecast increase in accidents on this section of road, since it is unlikely that the proposed Scheme will materially change the number of motorcyclists attracted to Snake Road for leisure rides, which is one of the principal reasons for the current high accident rate' 'It has been agreed that the scheme modelling will be updated as the detailed design evolves'. The detailed design of the scheme itself is not going to alter the incidence of crashes on the Snake Pass unless it includes a massive traffic restraint measure akin to the Mottram crossroads and/or average speed cameras along the Pass. This 'updating' appears most unusual as the modelling of accidents on the Snake has been set up to ensure the most accurate relationship between accidents and flow [REP2-090 4.3.7-4.3.8].</p>	<p>National Highways has reported the forecast impact of the Scheme on accident rates in the Transport Assessment Report (TAR) (APP-185) and in previous responses to questions and comments during the Examination. This has demonstrated that the forecast number of accidents due to the Scheme across the modelled road network represents less than a 0.3% increase, which is considered marginal. National Highways will not be reassessing the forecast number of accidents due to the Scheme.</p>

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	<p>Using the COBALT model crashes increase in proportion to increased 24-hr AADT. The model has forecast 38% increases in traffic so unless flows reduce the forecast number of crashes should stay the same.</p>	
	<p>Examples of the critical impact of the outputs of the model a) Effects on Glossop, Hadfield and Padfield</p> <p>The model relies on diversion of traffic off the A57 onto minor adjacent roads and rat running through residential streets. Shaw Lane and Dinting Road are forecast to experience increases of over 1000 AADT. The impacts of this traffic growth have not been adequately addressed at this Examination. The potential need for improvements to Shaw Lane/A57 Dinting Vale junction, a pedestrian crossing to enable safe journeys to school and the railway station across Dinting Road and the implications of on-street parking on Shaw Lane which prohibit two-way traffic movements remain unresolved. Hadfield Road - Cemetery Road also experience increased traffic flows without any assessment of their impact. Referring the situation to post scheme monitoring through the POPE, as proposed by DCC [REP8-023], is too late. Such an issue which relates to wellbeing of residents, including traffic safety near schools, must be frontloaded as a planning issue to be resolved before consent can be given, not backloaded to something to try and deal with post-decision by under-resourced local authorities.</p> <p>Government guidance TAG Unit M3.1 specifically states that roads in residential areas 'especially rat runs' should be assessed. DCC and HPBC have expressed their concerns. 'Villages of Hadfield and Padfield should also be safeguarded to prevent rat running traffic trying to avoid the strategic road network' (REP2-051 3.22 and 14.4 response to WC1; emphasised by REP9-033). A full assessment of the impacts on the road network in Glossop, Hadfield and Padfield must be presented to the Examination and be subject to challenge and scrutiny in the normal way. Without this the ExA cannot assess the adverse impacts of the scheme.</p>	<p>An assessment of the impacts of the forecast increases in traffic flow due to the Scheme on Glossop, Hadfield and Padfield, including Dinting Road, Shaw Lane, Hadfield Road and Cemetery Road, has been undertaken. This assessment has found that the impacts of the Scheme on these roads are insufficient to result in any significant adverse effects that require mitigation.</p> <p>Regarding the junction of the A57 with Shaw Lane, please refer to the Applicant's written Summary of Issue Specific Hearing 3 (9.75.22 and 9.75.25 – REP8-019).</p> <p>Regarding on-street parking on Shaw Lane, please refer to the Applicant's written Summary of Issue Specific Hearing 3 (9.75.10 – REP8-019).</p>
	<p>b) Tintwistle AQMA</p> <p>The Tintwistle AQMA was the location of an air pollution exceedance with the scheme that would have jeopardised development consent and led to the so-called "model refinement." Differences between 2025 DM and DS modelled traffic flows through the AQMA did not meet the criteria for assessment of air quality. The predicted vehicle flows fall 40 vehicles per day short of the required threshold (an increase of 1,000 AADT) required by the guidelines. A shortfall of 40 vehicles per day could arise from refinement and the flawed outputs of the model. A difference in 40 vehicles is insignificant. As a precautionary measure the AQMA must be assessed.</p>	<p>Please refer to the response to item 6 above, regarding the 'model refinement'.</p> <p>The DMRB LA 105 guidance (para 2.1) provides traffic change criteria as absolute values. The guidance does not provide tolerance levels around the absolute value (see REP4-008 7.dd).</p>
	<p>c) Air Quality along the A57</p> <p>The A57 had two air pollution exceedance sites with the scheme that would have jeopardised development consent and led to model refinement with diversion of traffic through residential side streets. Differences between 2025 DM and DS modelled traffic flows along the A57 between its junction with the A626 Glossop Road and with Norfolk Street did not meet the criteria for assessment of air quality (an increase of 1,000 AADT). The difference between 2025 DS and DM modelled flows was +300 AADT on Dinting Vale and -300 on High Street West. Dinting Vale and High Street West were therefore excluded from the air quality study and only half the AQMA was assessed. HPBC has repeatedly requested assessment of both</p>	<p>Please refer to the response to item 6 above.</p> <p>The Applicant has continued to discuss the approach to assessment of the Air Quality Management Areas at Dinting and Tintwistle with HPBC, however the Applicant maintains their position that the DMRB LA 105 traffic scoping criteria provide a robust and appropriate threshold for defining the air quality study area for the assessment of significant effects of air quality of highways schemes. Therefore, it is not necessary or appropriate to undertake any further assessment within the Air Quality Management Areas which are not located within the Scheme study area.</p>

Reference	IP Issue	NH Response
	<p>the Tintwistle and Dinting Vale AQMAs [Local Impact Report REP2-046, 19.1]. It is still having to restate the failure to properly assess these AQMAs at deadline 9 [REP9-033].</p>	<p>The Applicant's and HPBC's positions are provided in the Statement of Common Ground with High Peak Borough Council to be submitted at Deadline 12.</p>
	<p>d) Impact on European Sites alongside A628T</p> <p>A Habitats Regulations Assessment is required by Regulation 63 of the Habitats Regulations for all projects and plans which may have 'likely significant effects' on a European Site. The Applicant deemed this assessment unnecessary as the AADT east of the A6024, where the European site boundary is roadside, did not meet the criteria of 1,000 additional vehicles daily. The difference between DM and DS flows in 2025 is +846 AADT. A shortfall to meet the criteria of 150 vehicles per day could arise again from the flawed outputs of the model. The PDNPA has submitted a sustained judgement that the European sites adjacent to the A628T must be assessed [Local Impact Report REP2-048, 8.3.12 through to its deadline 9 response REP9-035]</p>	<p>The DMRB LA 105 guidance (para 2.1) provides traffic change criteria as absolute values. The guidance does not provide tolerance levels around the absolute values.</p>
	<p>e) Significance of carbon emissions associated with the scheme</p> <p>So far, only a single solus quantification of carbon emissions has been made, and this is the wrong solus calculation being an underestimate; and there is no cumulative quantification. This is before further errors in the carbon quantification which may result from the issues outlined above with the traffic model. Further, the IEMA and EIA guidance has not been followed to make assessment of carbon against local and regional policy and targets [REP9-039]. With so many errors, underestimates, omissions, it is not credible to even attempt to assess the significance of the carbon emissions of the scheme, or to reach a reasoned conclusion on the significant effects of the proposed development on the environment and climate change.</p> <p>Until there is confidence in the traffic modelling all its outputs are questionable. The examples we have given of use of the outputs from the model demonstrate that the worst effects of the scheme are unknown/ uncertain. We cannot accept the outputs of the model at face value without an independent review of the model. Full and proper scrutiny is most important – in 2007 a previous iteration of the proposed development (Mottram-Tintwistle bypass) was abandoned after serious flaws were found in the modelling.</p> <p>The traffic modelling and its application should be subject to independent assessment. Full technical dialogue with the assessors, the ExA and participants should be established to the satisfaction of all parties at the Examination and in line with professional Codes of Conduct. Only full challenge and scrutiny of the model will enable all parties to have confidence that the model outputs are robust.</p>	<p>Please refer to National Highways' response to IP Issue for 'Problems with the model Item 4' above in relation to a single solus quantification.</p> <p>Chapter 14 of the ES was submitted in June 2021, whereas the IEMA guidance was published in February 2022. Given the iterative nature of assessments, which take time and should be undertaken during the Preliminary Design stage, the methodology cannot be applied retrospectively.</p> <p>Please refer to National Highways' response to IP Issue '3 The Carbon Assessment' below in relation to making assessments of carbon against local and regional policy and targets.</p>
	<p>2. THE OMISSION OF A WEBTAG COMPLIANT APPRAISAL</p> <p>A full WebTAG compliant Appraisal should have been supplied to the Examination. The Transport Assessment Report (TAR) for the scheme is no substitute for a WebTAG compliant Appraisal as recognised by Government Guidance - 'it is unlikely that a Transport Assessment or Statement in itself could fulfil the specific role required of a transport element of an Environmental Impact Assessment where this is required.' The TAR is completely unacceptable on many grounds, including professional practice, and has resulted in insufficient evidence being presented to the Examination to test compliance with Government policy or guidance. It has provided no or extremely limited information on options assessment, model development, forecasting and economic appraisal. A WebTAG compliant Appraisal would include the following detail:</p>	<p>The assessment of the Scheme has been undertaken in full accordance with Department for Transport (DfT) Transport Analysis guidance (TAG). The information on the traffic modelling and assessment of the Scheme submitted into the dDCO examination is commensurate with that submitted for other National Highways DCO applications and is considered sufficient for interested parties, stakeholders and the Examining Authority to make an informed decision regarding the balance of the benefits of the Scheme compared to its impacts. National Highways has promptly provided additional information requested by Interested Parties during the dDCO Examination.</p>

Reference	IP Issue	NH Response
	<ul style="list-style-type: none"> • Current travel demand and level of services • Opportunities and constraints e.g. the air pollution exceedance sites; details of accident rate on the Snake Pass • Origin-destination data • Reference as to how public transport, walking and cycling are addressed • Calibration or validation of the road network, matrices, screen lines • Validation of link flows, turning counts and journey times • Forecasting assumptions including for the local modelled area for public transport (today – 2025 – 2040); cycling (today – 2025 – 2040); walking (today – 2025 – 2040) • Forecast scenarios high and low growth • Scheme assumptions • How AADT flows were calculated • Traffic forecasts • Journey times and journey time reliability with realistic origin and destination pairs and zone to zone timings. • Data on junctions and queue length data for key junctions; how the junctions were modelled • Detail of economic appraisal • Trip distances, severance, accident data • Risk and optimism bias • Cost profile of scheme. <p>A robust and complete WebTAG compliant Appraisal should be prepared on a transparent basis, remedying the substantial lack of relevant information in the TAR, and presented to the Examination.</p>	
	<p>3. THE CARBON ASSESSMENT</p> <p>The results of the carbon assessment will be a key element in the planning balance required by the Planning Act 2008. The Applicant has taken a position on carbon assessment which is indefensible, not compliant with applicable law and guidance, and technically incorrect, as follows:</p> <ul style="list-style-type: none"> • There is no EIA compliant cumulative carbon assessment. The applicant keeps saying that “there is no set methodology for cumulative effects assessment” (eg: REP9- 027/8.12.4). Notwithstanding whether this is true or not, the point is that the applicant has done no quantification, or assessment, of the cumulative effects of the scheme with other developments on carbon emissions. • There is no assessment of significance against the annual carbon reduction targets, and trajectories, for transport in the Net Zero Strategy 2021 [REP9-039/10]. 	<p>Bullet 1: National Highways has consistently maintained that Applicant’s response to Issue Specific Hearing 2 Item 6 c) and d) Cumulative Carbon Assessment (REP5-026) clearly sets out the approach to the cumulative assessment that has been undertaken. National Highways has a mandated assessment methodology for its schemes so they are comparable for decision making purposes. To undertake an assessment as requested by the IPs would not be in accordance with assessment criteria mandated by National Highways for their schemes. The IPs state that National Highways keep saying there is no set methodology for cumulative effects assessments, which is true. However the cumulative effects assessment undertaken is proportionate and appropriate for the purposes of decision making, and it is consistent with other comparable DCO and EIA assessments. PINS Advice Note 17 and DMRB LA 104 both support cumulative traffic assessments and the approach is recognised as an industry standards. The fact that this approach is consistent with the cumulative assessment undertaken for the M54-M6 Link Road scheme, which has been accepted by the Secretary of State, demonstrates this. In paragraph 52 of the Decision Letter states:</p>

Reference	IP Issue	NH Response
	<ul style="list-style-type: none"> There is no local or regional assessment despite two sets of available data (BEIS UK carbon emissions national stats and local authority SCATTER budgets from the Tyndall Centre), and a third set of self-scaling data – a local/regional proxy – provided by the study area and traffic model itself (when corrected and fully transparent). The Applicant appears to be not intending to make available the methodology of the sensitivity test on the carbon emissions within the Examination time frame. It is not clear when DfT will approve the validity of its test, also likely beyond the Examination time frame. Given this, it is incredible that this data has been provided to the examiners as if it might add value in making their recommendation to the SoS, but the Applicant has not explained what it means, and how it affects the significance of the carbon emissions associated with the scheme. This is neither due process, nor legitimate and it is unacceptable. A full carbon appraisal including the sensitivity test must also be done with a non-road alternative, in order to fulfil the requirement in subsection 7 of section 104 of the Planning Act 2008 to weigh up the adverse impacts and the benefits of the scheme. This comparative assessment would allow the adverse effects of the scheme's carbon emissions to be placed in context. There is a complete lack of transparency on the BCR calculations for the scheme. No recalculation based on the most recent carbon prices has been attempted. The economic case, and the Benefit Cost Ratio (BCR) need to be recalculated against the new carbon price data, and revised traffic modelling which corrects the above flaws. This should include: the construction carbon emissions on the cost side of the BCR; a solus quantification of the carbon emissions associated with the scheme based on the carbon impacts against the current environmental baseline; the full cumulative carbon emissions with other road and land based developments. Full workings must be supplied to the examination. The provision of an up-to-date economic appraisal of the scheme relates to the case for the scheme which is a material issue in the planning decision: it is not legitimate for revisions of the BCR to be promised at later stages in National Highway's own internal process, where they would be outside the planning examination process. <p>All this falls well short of legal, guidance and policy requirements – the EIA Regulations, the UK's sixth carbon budget, the UK's Nationally Determined Contribution under the Paris agreement, the UK's Net Zero Strategy (and the Climate Change Act), National Highways' licence agreement, EIA and IEMA guidance and NPSNN. To understand the full impacts of the scheme's carbon emissions is not a luxury, it is an absolute necessity. The above assessments must be made - they are required not only by the law, but also by the global scientific evidence as endorsed by the UK Government as below, by the precautionary principle, and by the principle of sustainability.</p>	<p><i>'The Secretary of State is content that the Applicant has adequately assessed the likely significant effects of the Proposed Development on climate and its cumulative impacts on climate taking account of both construction and operation as required by the 2017 Regulations and this information has been taken into consideration when assessing whether development consent should be granted'.</i></p> <p>Paragraph 130 of the more recent Decision Letter for the M25 Junction 10/A3 Wisley Interchange makes the same point.</p> <p>With regard to the EIA Regulations and making an assessment against local and regional policy and targets, it should be noted that paragraph 45 of the of the Decision Letter for the M54-M6 Link Road scheme states <i>'the impact and effect of carbon emissions on climate change, unlike other EIA topics, is not limited to a specific geographical boundary and that the approach that needs to be taken to assess the cumulative impact of carbon emissions is different than for other EIA topics. Noting this and that there is no defined distance for assessing the impact of carbon emissions, the Secretary of State considers that the Applicant's approach to assessing the impact of the Proposed Development on carbon is acceptable as it takes into account the Proposed Development and all other developments likely to have an influence on the Proposed Development and on the area the Proposed Development is likely to influence'.</i></p> <p>Paragraph 122 of the Decision Letter for the M25 Junction 10/A3 Wisley Interchange makes the same point.</p> <p>Bullet 2: Options appraisals and alternatives assessments have been undertaken at earlier development stages of the Scheme.</p> <p>Bullet 3: National Highways maintains that there is no requirement to assess the significance of the scheme on regional or local carbon budgets and that the NPS NN does not require such an assessment. In setting carbon budgets Parliament has not imposed any legal duty upon local authorities to attain any particular targets, whether for carbon budgets or for net zero 2050. i.e. there are no legal duties which require particular geographical areas within the UK to achieve particular reductions in carbon emissions by particular dates.</p> <p>Bullet 4: The Applicant has given further details of the methodology of the TDP sensitivity test with in REP9-027 section 8. The Applicant intended to make the TDP sensitivity test year by year carbon emissions for the 60 year appraisal period available as soon as they are able to do so. The TDP sensitivity test results for the 4th, 5th and 6th carbon budget periods are presented in REP5-026. The TDP sensitivity test was intended to give an indication of what the the carbon emission change with the Scheme for the TDP delivery pathway assumptions. The emission change is given as an upper and lower bound to reflect uncertainty in the delivery of the emission reduction commitments. The emission change with the Scheme for the TDP delivery pathway assumptions would be anticipated to fall between the upper and lower bound values given in REP5-026. This was an approach accepted by the Secretary of State for the decisions for the M54 to M6 Link Scheme and M25 Junction 10/A3 Wisley Interchange Scheme.</p>

Reference	IP Issue	NH Response
		<p>Bullet 5: The assessment of carbon emissions has been undertaken based on the available traffic model scenarios.</p> <p>Bullet 6: The BCR calculations presented in the Case for the Scheme were based on the latest carbon prices available at the time of the assessment. Previous responses from the Applicant have commented on the likely changes to the BCR with more recently published carbon costs within WebTAG databooks and commented on the timeline for revising the economic case. The impact on the BCR of more recent revisions to carbon prices has been communicated and it has been confirmed that the impact on the BCR of this variation aligns with the Applicant's own calculations.</p>
	<p>Being led by the Science</p> <p>We say above that further assessments must be due to the legal and policy framework. They are also required to be "led by the Science" as the global scientific evidence on Climate Change is endorsed by the UK Government. As background, the Intergovernmental Panel on Climate Change (IPCC) has published three recent reports (all part of its 6th Assessment Report, AR6): the UK Government is a drafter and signatory to the policy statements associated with each of these reports⁴. These form the latest scientific knowledge on Climate Change, and represent a massive scientific endeavour, are underwritten for their policy implications by our own government. The implications of this scientific consensus extends to all levels of government and administration in the UK having been authorised by our national Government. As has been widely reported, the IPCC reports make a clear and unanimous case for very urgent action on Climate Change actioned the immediate and rapid reduction in carbon emissions – not over decades, but over years in the very near future (45% cuts by 20305). On April 4th 2022, Professor Jim Skea, OBE, CBE from Imperial College, London and Co-Chair of IPCC Working Group III said on the release of the latest report "It's now or never, if we want to limit global warming to 1.5°C (2.7°F); without immediate and deep emissions reductions across all sectors, it will be impossible". This means starting serious, evidence-based decarbonisation now in 2022 – not next year, nor the next, nor 2025, but now. We do not believe that the Application is consistent with what the scientific consensus requires, as underwritten by our own Government.</p>	<p>Although the Scheme results in increased carbon emissions, which contribute to climate change, the implementation of the UK Government's Transport Decarbonisation Plan (TDP) is currently the primary mechanism for reducing carbon emissions from the transport sector. It is considered that the Scheme's contribution to overall carbon levels is very low and not considered to be significant (noting that there is no set significance threshold), and that through implementation of the TDP carbon emissions are expected to continue to fall in the future, when the Scheme is operational.</p> <p>At paragraph 31 of the M54 Link Road decision letter, and paragraph 109 of the more recent decision letter (12 May 2022) for the M25 Junction 10/A3 Wisley Interchange, the following same statement is made:</p> <p>'The Secretary of State considers that the majority of operational emissions related to the scheme result from vehicle usage and that the Transport Decarbonisation Plan includes a range of non-planning policies which will help to reduce carbon emissions over the transport network as a whole over time (including policies to decarbonise vehicles and radically reduce vehicle emissions) and help to ensure that carbon reduction commitments are met. Beyond transport, Government's wider policies around net zero such as 'The Net Zero Strategy: Build Back Greener' ("Net Zero Strategy"), published by Government in October 2021 sets out policies and proposals for decarbonising all sectors of the UK economy to meet the net zero target by 2050. It is against this background that the Secretary of State has considered the Proposed Development'.</p> <p>To conclude, the additional carbon emissions due to the Scheme are low and therefore will not impact on the delivery of the Net Zero Strategy (NZS), the Nationally Determined Contribution (NCD) commitments to reduce GHG emissions, or the TDP, and that the UK government intends to implement these policies to manage their overall strategy to meet net zero.</p> <p>National Highways acknowledges the importance of minimising the increase in emissions in order to achieve net zero, and is actively seeking to minimise them through appropriate mitigation that is secured through the DCO, and to be in accordance with 5.23(g) of the National Highways licence. DMRB LA 114 states that: "Projects shall seek to minimise carbon emissions in all cases to contribute to the UK's target for net reduction in carbon emissions". This requirement applies whether or not the Scheme is anticipated to generate a significant effect on climate. Residual carbon emissions during the construction stage are much easier to manage by applying and fully embedding the carbon reduction hierarchy set</p>

Reference	IP Issue	NH Response
		<p>out in LA 114: Avoid / Prevent, Reduce, Remediate. In doing so through the EIA process, carbon reductions have been targeted and are prioritised at all stages of the development, and the Scheme continues to pro-actively consider how the remaining emissions can be reduced even further. This will be secured through the implementation of Requirement 12 of the draft DCO, which requires a Carbon Management Plan (CMP) has been submitted to and approved in writing by the Secretary of State following consultation with the relevant planning authority and the local highway authority. The CMP must also adhere to the principles of PAS 2080.</p> <p>In a wider context, National Highways' Net Zero Plan states that, while road travel represents a higher carbon way to travel in the UK today, this is changing fast. The Net Zero Plan is committed to science based targets and sets out National Highways aims to support the transition to net zero travel on the SRN by 2050, and to facilitate embedding 'net zero' as business as usual across the organisation and whole supply chain. Additionally, National Highways is working with the UK Government to help address the very challenging ambitions to transition to net zero across the economy (of which transport is a major contributor). However, the SRN is needed and will continue to form an important part of a sustainable transport network in the future.</p>
	<p>4. INSUFFICIENT INFORMATION TO ALLOW 'INTELLIGENT CONSIDERATION'</p> <p>We have shown above that information is missing, inaccurate or misleading to the extent that it precludes an 'informed and intelligent response' to the disadvantage of us and other parties that may be affected by the decision (Gunning principles). Under the Aarhus Convention the public are guaranteed the rights of access to environmental information, and public participation in decision-making. As a public agency National Highways should be as open as possible about all the decisions and actions that they take. Sections 7.6-7.9 of National Highways own licence⁶ with the Government requires this. The Applicant should give reasons for their decisions and restrict information only when the wider public interest clearly demands. The Applicant should also be accountable which means submitting to whatever scrutiny is appropriate (Nolan principles). We believe these principles of fairness, openness and transparency have not been met by the Applicant.</p>	<p>See response to 2. above.</p>
	<p>5. REQUESTS TO THE ExA</p> <p>The requests we are jointly making to you are:</p> <ol style="list-style-type: none"> 1. The traffic modelling and its application should be subject to independent assessment. 2. A full technical dialogue should be established with the independent assessors, the Applicant, and participants at the Examination to the satisfaction of all parties and in line with professional Codes of Conduct. 3. A full WebTAG compliant Transport Appraisal should be supplied to the Examination by the Applicant, including all relevant and important aspects. 4. An assessment of the scheme's carbon emissions that meets legal, policy and guidance requirements should be provided by the Applicant. <p>We understand that what we are asking for would require you to suspend the Examination under EIA Regulation 20 and extend the time span. However we ask you to consider that it would be a serious risk, and a potentially regrettable error leading to ramifications later on, to</p>	

Reference	IP Issue	NH Response
	<p>conclude this Examination on 16th May. The overall objective must be to ensure that the SoS is satisfied that the material provided by the Applicant is sufficient for him to reach a reasoned conclusion on the significant effects of the proposed development on the environment, and that it meets legal, guidance and policy requirements. We seriously doubt that you have the information that you need to write your report, to make a recommendation, and to provide the SoS with all the relevant material for his later decision. All four requests are founded in applicable law and guidance, and the resulting obligations placed upon the SoS as decision maker.</p> <p>If the ExA accepts the risk and error and our requests are not granted, as things stand the scheme must be rejected on three grounds:</p> <ol style="list-style-type: none">1. NH have not followed guidance and have failed to supply all the relevant and necessary information.2. From the data we have (as opposed to the modelling) the adverse effects of the scheme are very substantial and the benefits unproven.3. Data that has been provided suggests a major adverse impact on Greater Manchester which has been minimised in the modelling due to the deliberate choices made. <p>We are happy to supply any additional information you may require.</p>	

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