Deadline 3 Submission

Daniel Wimberley Examination number zzz

List of references

DL2 Submissions

library number	*surname*	*type of submission*	*other detauil*
REP2-021	HE	replies to First Written Questions	
REP2-046	HPBC	LIR	
REP2-048	PDNPA	LIR	
REP2-060	Parish Council	Written representation	
REP2-063	Farrell	Written representation	
REP2-064	CEPP	Written representation	alias Dr Andrew Boswell
REP2-069	CPRE	Written representation	
REP2-072	Wimberley	Written representation	
REP2-081	Saunders	Written representation	
REP2-090	CPRE	Written representation	788 pages of BBA technical papers

Topic 1 - Participation in hearing(s) in February 2022

I wish to participate in **Issue Specific Hearing 2**

I would wish to have the right to contribute on any topic, but my main concerns and main contributions would be in the following areas:

Traffic, and network data
Alternatives
Cyclists' provision
Air Quality
Climate Change

Topic 2 - Comments on submissions for DL2, including Written representations, LIR's and replies to First Written Questions, mainly from HE

I will group these by theme for ease of understanding.

THEME 1 – TRAFFIC DATA

The points which I will make below, which spring from DL2 Submissions, can be grouped into three areas:

1) The overall accuracy of the picture we are being presented with is questionable. Some things we are being told are hard to believe, there are major discrepancies, etc. **Some form of independent peer review will be needed to address this matter.**

2) Some data appears to be "data non grata" – data which is being kept, if not totally under wraps, at least, decently out of normal sight**. This data should be made fully visible in the name of transparency and good ordering of the EiP.**

3) At many junctures we are told that x, y, or z cannot be examined in detail. X, y or z has been "screened out" or "scoped out" because it did not meet some relevant criterion and this always comes back to statements by HE to the effect that: – 'the difference between Do-Something and Do-Minimum is not great enough to trigger investigation.' I believe that underpinning this mass non-investigation of matters, all of concern and some of them of extreme concern, **lies a systematic methodological flaw which can and should be remedied.**

All three matters will require decisions of the ExA.

1) TRAFFIC DATA - ACCURACY OF WHAT WE ARE BEING TOLD

The Mottram Market Street anomaly

i) HE replies Q.3.11

HE's explanation of the forecast increase in traffic DS-DM on Market Street in Mottram, appears to be plausible. However my concern with the forecasts at Market Street (site number 6 on the maps on pages 52 and 53 in CftS,) is that the 2 streets south of Market Street (sites 4 and 5) which feed traffic into, and take traffic from it, each has a far larger flow than Market Street itself. How can this be?

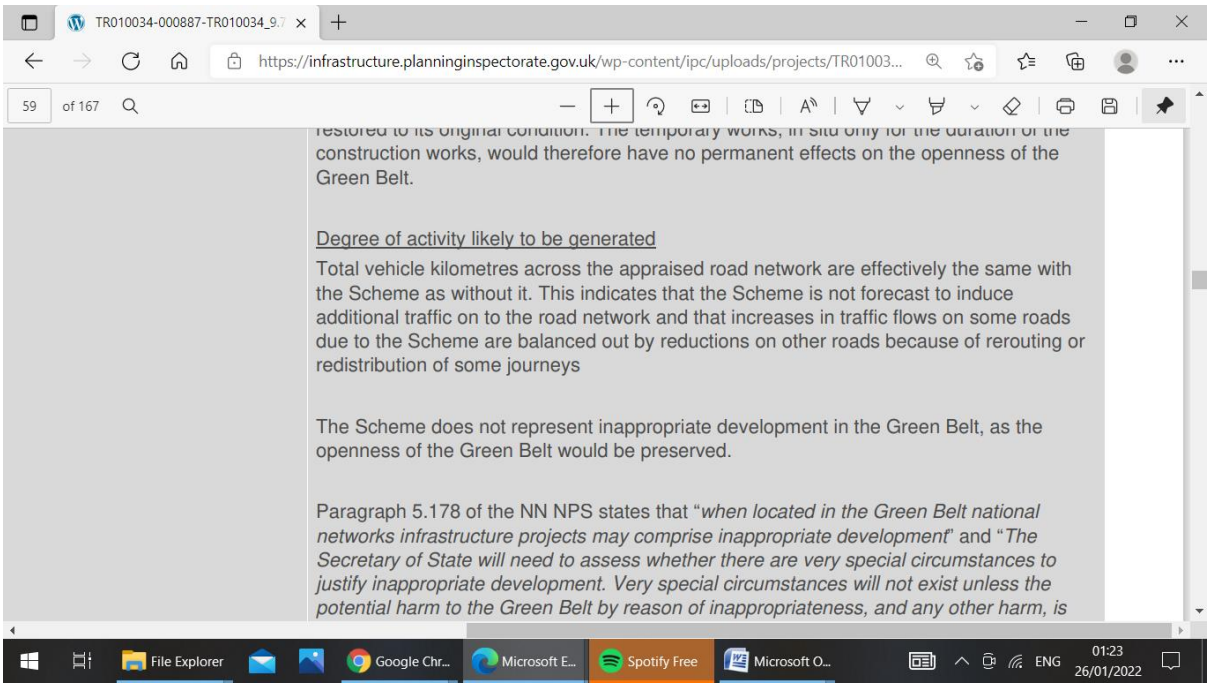
'traffic will not increase overall'

ii) HE replies Q.4.1

This is the claim which HE makes in the course of answering a question about the Green Belt. First I will set out the question, and the oddness of HE's reply, and then this point about the "total vehicle kilometres" not increasing in the area.

This question is about whether or not all or some elements of the scheme (for both the construction and operational phases) constitute inappropriate development in the Green Belt, and whether the scheme affects the "openness" of the countryside at this point.

HE's reply has a heading "Degree of activity likely to be generated" under which they write (see screenshot below – I (sometimes) cannot copy from this document)



Two comments here:

First this is irrelevant to the question asked. No one is talking about whether there is more traffic in total in this area with or without construction. The question is: is the new to-be-constructed-perhaps road "inappropriate development"? If it does, then the question of justifying this intrusion has to be faced and at that point, issues such as the overall value of the road do arise. And, yes, the road clearly destroys the open and "natural" character of this land – it is strange for anyone to pretend otherwise. So – there has to be a good reason for doing this "inappropriate development" so . . .

Second, and more near to my concerns in this theme, is whether this statement can be true. It is a very puzzling claim. Some points:

- In their answer to question 3.6 HE say that additional traffic is forecast to be attracted to the new link road from alternative routes.
- In RR-0677-1 HE a) already admitted the re-routing (attraction) effect, b) stated that by 2040 the DS flows will be 10% more on the A628 and 38% more on Snake than the DM flows. And then claimed that **the total traffic kilometres over the appraised network will be the same with the scheme as without it.** This claim, together with the admissions re the increases, is made repeatedly in REP1-042
- And yet I remember clearly that the overall picture which HE paints in CftS and TAR, and in CB also, is of a steady increase in traffic generally, and by extension in this area. Is this the case, or not?

- For example, when writing about "The requirement for the Scheme" in CftS (APP-182) HE say (Para. 3.1.2): "There are many factors that presently reduce journey time reliability these include severe weather; **long term traffic growth which will bring some urban sections to their capacity;** maintenance on single carriageway sections; accidents; asset condition, including the standard, age and damage to infrastructure; and a lack of technology to assist in the operation of the routes and provide information to travellers" *(my emphasis)*
- Or for example, in Chapter 5, the economic case of CftS we read at Para. 5.1.6): *"*The economic assessment is based on the assignment of a forecast Core Growth Scenario, with alternative sensitivity tests using Low Growth and Optimistic Growth assumptions for the volume of traffic using the Scheme (as aligned with TAG Unit M4 (Forecasting and Uncertainty). The **Core Growth Scenario traffic forecast** *(DW Note: which is the one used by HE, as I understand it, as their main forecast)* **is based upon what is deemed the most likely** land use and **traffic growth assumptions** for the route" *(my emphasis)*
- Or for example, in the TAR, (APP-185) we read, as part of the section on the "Future Baseline" at Para. 4.1.1: "The Do-Minimum modelling undertaken predicts that vehicle flows on the highway links within the study area will continue to increase in a Do-Minimum scenario. Between **2025 and 2040, vehicle flows on all links except for the B6174 are forecast to increase."** *(my emphasis)* After which TAR gives some examples.
- Specifically there are plenty of roads with increased traffic. RR-0571 states: "Projections for the proposal indicate substantial increases in traffic and related emissions on the A57 Brookfield (31%), A57 Snake Pass (38%), on minor roads - New Road Tintwistle (50%), Norfolk Rd (21%) and Dinting Rd (45%), and small but significant increases on the A6016 Primrose Lane, A57 High St East, Shaw Lane and Cemetery Rd. All these roads have households living adjacent to them and Dinting Road has a school" This is very hard to reconcile with HE's claim.
- Or for example, what HE said in the CB (Consultation Brochure) in Winter 2020:

"Much of this heavy traffic travels along local roads, which disrupts the lives of communities, and makes it difficult and potentially unsafe for pedestrians to cross the roads. **These issues will only get worse with time** if significant improvements aren't made"

(CB, page 3 – the first page of text), fifth paragraph in)

And a final more technical point – maybe this is jujst an anomaly, but it makes me wonder. The PDNPA say in their LIR, at Para. 7.2.1:

"7.2.1 The scheme leads to a general increase in traffic across four of the six roads within the National Park described in section 7.1 when compared to the 'Do Minimum' scenario. It should be noted that the figures produced by the National Highways modelling appear at odds with those available on the DfT website used to populate section 7.1 of this report. In some cases, the figures in 7.1 from 2019 appear to be equal or higher than those provided for the 2025 'Do Minimum' scenario. This may be due to the methods used to derive the DfT data, with manual counts being used to derive AADT figures. However, it also raises the question of possible undercounting through the model."

Be that as it may, there is something not quite right here. There are 2 versions of what is going to happen, and they both cannot be right. I am tempted to do some wondering about why this should be so. But it is enough to say to you that this inconsistency should not be allowed to stand and needs to be cleared up.

I will propose a remedy at the end of this submission when I critique the technical documents submitted by CPRE, because in that critiques lies the possible cause of this issue. zzz

Bamford village anomaly

It may be that this sheds some light on, or is related to, the above section on '**traffic not increasing overall'**

Charlotte Farrell says (Para. 6):

6. Increased traffic over the Snake Pass will inevitably make this (the difficulty in crossing the road though the village) worse. I raised this in my initial representations to the inquiry but in the Response (RR-0126) it says that traffic flows through the village will decrease:

(DW Note: she quotes) a. â€œTraffic modelling undertaken to assess the impact of the Scheme indicates that the traffic flow on the A6013 through Bamford will marginally reduce by 1% compared to without the Schemeâ€•. (sic)

Again this is hard to believe. A gap between DS and DM in 2040 (or it may be 2025 which she is talking about – the 2 years have the same forecast "gap" of 38%) of 38% over Snake pass becomes -1% in Bamford. The mystery deepens when she goes on to say (Para. 7):

"National Highways has not provided any logical explanation or indeed any explanation for this assertion and in fact it contradicts its own evidence on road safety in the Transport Assessment. Figure 7.2.10 of the Transport Assessment summarises the impact of the scheme in terms of personal injury accidents. It shows that it expects there to be a negative effect on the A6013; and even on the A6187; which, based on their earlier statements in that chapter indicate that they expect there to be increased number of vehicles using the road."

Bamford & Thornhill Parish Council say (Para. 4):

"Although the applicant's Environmental Statement states this as a 38% increase over today, it also describes it as a 'slight increase' in traffic"

Passing over the fact that the Council refers to an increase relative to "today's" traffic, which bears out what I have said about the presentation of all this traffic data, which is that what people expect, what they assume, and what would help them, **is a comparison of the predicted future flows with what is actually happening now** – or as near to "now" as it is possible to get - and not HE's method of comparing one hypothetical future flow (DS) with another (DM), the discrepancy here is startling – between a 38% increase, however it is understood - with the words "slight increase".

How can we explain this? Well, PDNPA have also noticed this. At Para. 8.4.6 of their LIR, we read:

"8.4.6 The percentage increase in flow on the A57 Snake Pass in 2025 with the scheme seems to be very large (37.7%) but the Environmental Statement (Table 7.32) only notes a 'slight increase' of traffic on the A57 (e.g. in relation to VP23) with no change to the Special Qualities of the National Park. We are concerned that the assessment of impact of increased traffic on the A57 is underestimated."

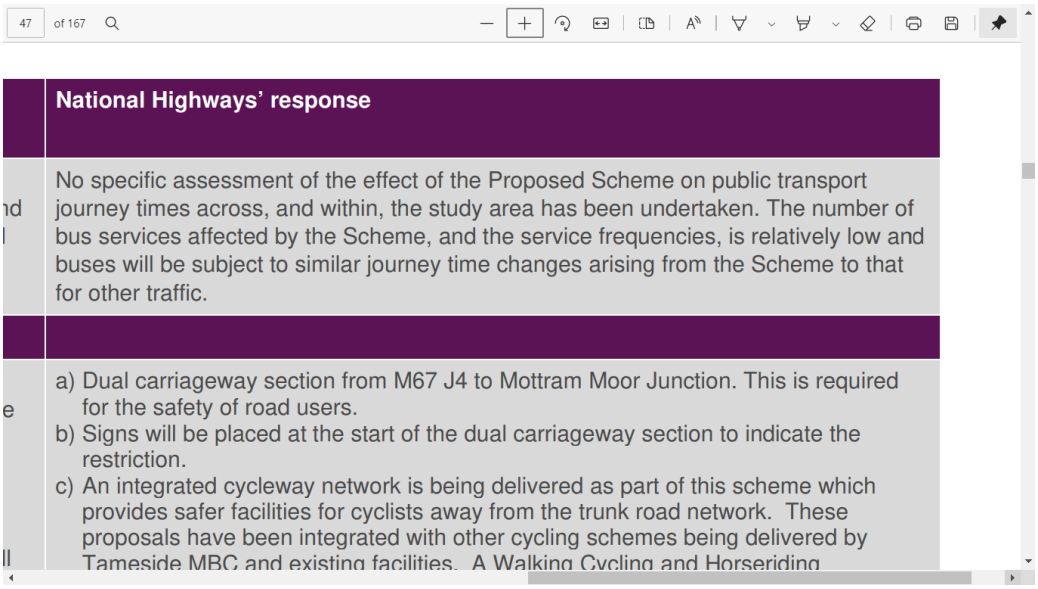
So here we see repeated, by the PDNPA, this same concern – namely that the increase (meaning DS-DM) is 38% and yet the ES calls this a "slight increase" This makes me wonder if there are not 2 different figures in play here, that underlying this discrepancy lies an error of some kind. The alternative is that the ES is being disingenuous. In this case I prefer the former explanation (in the technical sense of – "I think it is more likely" – **but please can the ExA find out what is going on here?**

There is a possible source for any errors – and that is that HE changed traffic consultants in mid-flow (in 2018/9) ! Maybe this is unwise. I return to a full consideration of this below zzz ref to section????

Impact of this issue on bus services

Considering the impact of the scheme on local bus services brings home how important this issue of the generalised traffic burden on the area as a whole is (not to mention the whole issue of traffic nuisances).

HE writes this in reply to question 3.14 about the impact of the scheme on bus journey times: (another screenshot, copying not possible)



	National Highways' response
nd l	No specific assessment of the effect of the Proposed Scheme on public transport journey times across, and within, the study area has been undertaken. The number of bus services affected by the Scheme, and the service frequencies, is relatively low and buses will be subject to similar journey time changes arising from the Scheme to that for other traffic.
e ll	a) Dual carriageway section from M67 J4 to Mottram Moor Junction. This is required for the safety of road users. b) Signs will be placed at the start of the dual carriageway section to indicate the restriction. c) An integrated cycleway network is being delivered as part of this scheme which provides safer facilities for cyclists away from the trunk road network. These proposals have been integrated with other cycling schemes being delivered by Tameside MBC and existing facilities. A Walking Cycling and Horseriding

Some comments!

Firstly, Figure 3.5 on page 28 of the TAR shows bus routes in the area – the associated text gives more details.

Secondly, HE says in this reply that no study has been undertaken and yet the TAR says at Para. 3.4.11 also on page 28: "It is expected that bus services running through the study area will benefit from improved journey times and reduced congestion"

Thirdly, putting the above two statements together reveal that there is no basis for HE's claim beyond them asserting it to be so. And yet the means exist for all participants in this EiP including, indirectly the public in its widest sense to get a clear picture of these issues (subject to any questioning of the correctness of the predictions, (see zzz for more on that question)

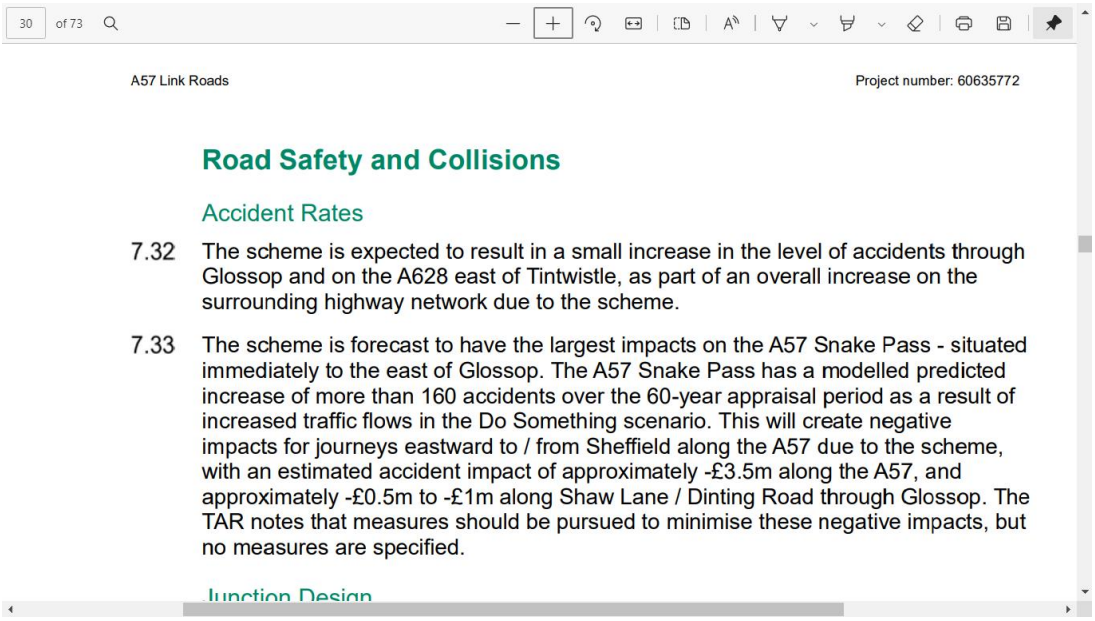
This is so important. Please can you, the ExA ask HE to publish a series of clear maps showing the traffic flows which they are predicting with and without the scheme, throughout the area, in the opening and design years, and also with the "current" flows, so that we all know what assertions about pollution, severance, and bus services sticking to time, are reasonable and which are not???

In connection with this plea, I would point to the Summary Comments of the LIR of HPBC which appear to be those of DCC also, especially bullet points 7, 8,9,11, all of which connect to this question of generalised traffic effects. How can we assess the scale of the adverse effects on streets in Glossop, for example, without this data clearly displayed?

Zzz layout

2) TRAFFIC DATA - DATA NON GRATA – THE GLOSSOP QUESTION

I start with a screenshot from the BBA technical reports:



HPBC and DCC both put in a holding objection because of inadequate information, which did not allow them to understand the scheme and its impacts.. For both these authorities

Glossop is the major population centre in the area we are mostly considering in this examination.

The combined LIR of these 2 authorities (see above) point to the impact of "increased traffic" on the centre of Glossop.

HPBC/DCC say, in their Chapter 15 on POP & HEALTH:

"15.21 The increased capacity for east – west trips between Manchester and Sheffield along the A57 through Glossop will lead to greater traffic flows through Glossop, and may increase congestion issues within Glossop and surrounding local areas. Related issues such as severance are not examined for this area. This is something that should be considered by the Applicant to understand if Glossopdale residents could experience an impact from severance. This should consider key locations that rely on safe road crossing such as the secondary school in Hadfield, Dinting Railway Station and Glossop High Street where shops rely on safe pedestrian road crossing points. Severance has the potential to affect local shopping habits and therefore the local economy"

Then traffic figures for certain roads within Glossop were revealed by Anne Robinson of CPRE, by pulling together scattered information, which was not in the Tables in the CftS nor in the TAR.. (I have just searched on Glossop in TAR, so far as I can see no traffic figures are given for Glossop.)

Accident levels seem to show that taken as a whole the network has more traffic, as this extract from the BBA documents shows, page 50, Para. 5.4.3

"5.4.3 A more detailed analysis of impacts across the network shows that the A57 Snake Pass, which is known to have a high accident rate, is forecast to experience an increase of more than 160 accidents. This alone exceeds the total impact across the rest of the network combined. **Small increases in accidents are also expected through Glossop and along the A628**. The **scheme does not make any of these roads intrinsically less safe but increases traffic flow, leading to a higher potential for accidents to occur**. Flow is reduced elsewhere on the network, such as along the M62, but motorways are safer than other road types and so the net impact of the combined rerouting is negative." *(my emphasis)*.

My comment: if the "total vehicle kilometres" was genuinely the same with and without the scheme, then according to the technical people the accident level would also remain the same.

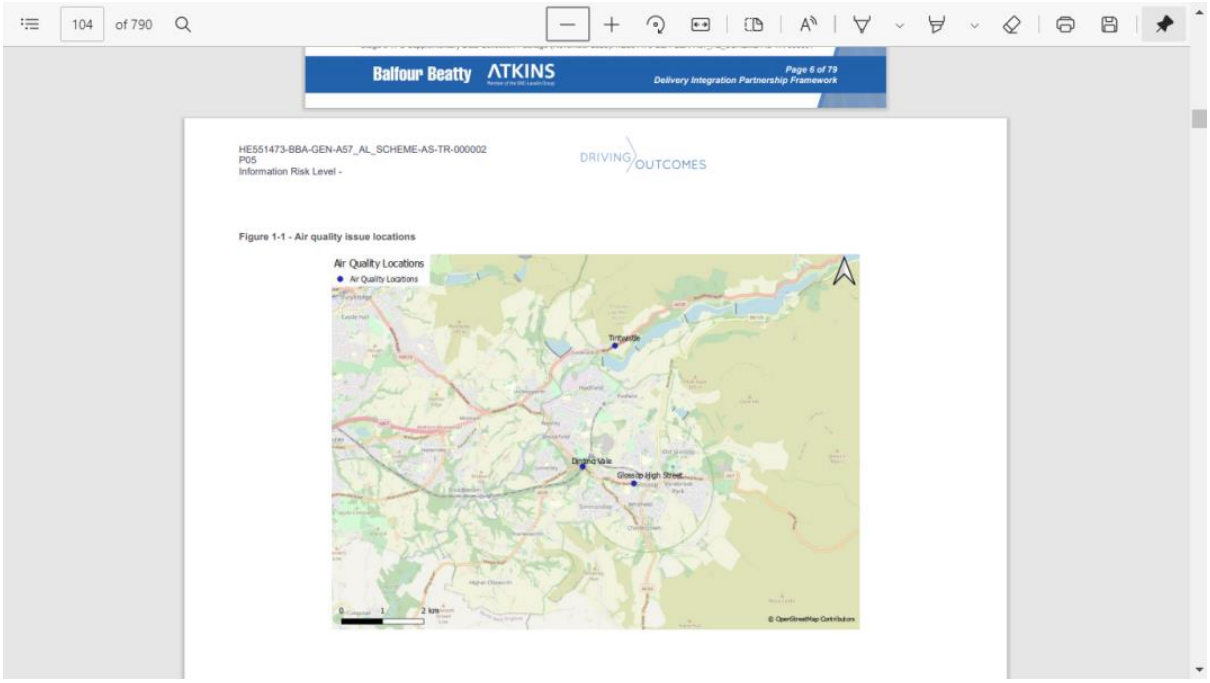
Note that in this section i am not saying that the work has not been done in and around Glossop. In fact the BBA documents suggest that in fact the accuracy of the model was enhanced by many enhancements. I am saying that the resulting information was not made publicly available as it should have been.

Looking under the bonnet just a little we find this in the BBA documents:

A57 Transport Forecasting Package (which begins on page 103), Para. 1.3, on Page 103 (NOTE: page numbers are nominal i.e. not the number on the document, but the number on the pdf menu bar)

"1.3. Need for modelling refinement

1.3.1. Initial air quality (AQ) modelling undertaken by Arcadis in July 2018 indicated that an unmitigated TPU scheme could have significant AQ effects and jeopardise the application for development consent. Changes in traffic flow and speed as a result of the scheme were predicted to cause exceedances of the AQ strategy objectives for annual mean nitrogen dioxide (NO2). The primary locations where a negative AQ impact was reported were the village of Tintwistle (A628) and the specific locations on the A57 route through Dinting Vale and Glossop High Street, as shown in Figure 1-1." *(DW NOTE: figure is on page 104)*



I deal later with the fuller implications of this switch of consultants in mid-flow of this scheme. However the point at this juncture is that the Glossop data was pointing to a very big problem, so big that it could derail the application, and this might have a bearing on why HE a) did the extra work and b) was not very open with this data.

3) TRAFFIC DATA - SCOPING OUT DUE TO TRAFFIC "INCREASE NOT BEING GREAT ENOUGH

If the proposer of a scheme such as the one before us were to compare DS traffic flows with a baseline, which would ideally be the nearest they could get to "current" flows, then the "increases" would be larger than the ones that they would register if the comparison were

made with DM. **This would make it more likely that a topic of concern, say Air Quality in a certain location, would be screened in or scoped in for investigation.**

If **on the other hand the opposite were to happen, as in the case of this scheme, then it is more likely that topics get screened out, or scoped out,** as not meeting the criterion, which is usually stated as there being a specified increase, in other words a limit value which has to exceeded for the assessment to be thought necessary.

I explained this problem in my Deadline 2 submission, and want to show that i am not alone in experiencing the problems that this methodological quirk imposes. I copy below some paragraphs from the PDNPA Executive Summary of their LIR.

Local impacts

……

"In all cases, these effects are related to increased traffic flows on National Park roads, principally the A628 Woodhead and A57 Snake Passes.

"The A628 Woodhead route across the National Park is predicted to experience a daily increase in traffic of up to 950 vehicles (2025) and 1,100 vehicles (2040); whilst the A57 Snake Pass will see an increase in vehicles of 1,150 (2025) and 1,450 (2040).

"This growth in traffic has the potential to negatively affect the Special Qualities of the Peak District, whilst impacting on the achievement of the Statutory Purposes of the National Park (Section 61, Environment Act, 1995).

"In the village on Tintwistle the negative effects of the scheme include on the Tintwistle Air Quality Management Area, the noise of traffic, severance for vulnerable road users and the effect on the Tintwistle Conservation Area"

Exec Summary – pages 7 and 8

The PDNPA correctly identify the key role traffic plays in bringing various harmful effects to the National Park in their care, and what these effects are. It then attributes these impacts to the "increase in traffic". But the increase they describe is the gap between two hypothetical (predicted) traffic flows – DS and DM.

What they do <u>not</u> do is compare the DS figures (or indeed the DM figures) with the BASELINE. If they were to do this then the increase in impacts would look worse, or even far worse. We do not know what the true increase is and therefore cannot accurately assess the potential increase in the negative impacts.

The scheme's proposers first ASSUME a given level of traffic growth. This is no doubt (though I would not know as I was not given this information when I requested it) included in the traffic model and predictions. But then it is "disappeared" from consideration, and we just get, all the time, DS vs. DM, thus obscuring the issue of the background growth, which is itself problematic,

The underlying growth in traffic is rendered invisible, and not present to the mind of the reader. This blind spot runs right through the examination, or rather through the presentation of the figures by HE.

I put it to you, the ExA, that this is simply not satisfactory. I think I know what the answer of HE would be if you were to ask them the question, namely whether my suggestion would not give a more accurate picture, to the public – meaning everyone – and would not better guide the decision as to whether an assessment is necessary for x, y, or z. I think they would say that they are following their guidelines, in this case, I believe that is in the DMRB (but I may have gathered that wrongly, and maybe it is enshrined in more than one guidance document). To which I would reply that in that case there is a problem with the guidance, and I can only plead with you, the ExA to deal with that fact appropriately. To sum up, the guidance is designed in such a way that the public is badly informed, and even one could argue, misled and that is unsatisfactory, and non-compliant with principles of good governance, such as Nolan.

Please will you ask the question above, or preferable by far, simply instruct HE to place before this examination the requisite comparisons, in chart, and in map form.

Just to conclude on this matter, I should say that this issue appears again and again. So for example (and by no means the only example) the PDNPA LIR has the following concerns from these "increases" to all of which my strictures apply and none of which appeared in my own Deadline 2 submission:

8.3.11 effect on protected sites, SAC, SPA and SSSI.

And 8.6.1 ditto

8.4.5 Effects on Conservation Areas. Note that Bamford is not mentioned here but we will be affected by considerable traffic increases over now, I believe, even if we are being told that the "increase" will be -1%

8.6.2 Impacts on breeding birds, some of them rare species

DW NOTE: I recommend a good look at this last example, where there is a limit value (for the birds). This reveals poignantly the fact that again, the "increase" "due to the scheme" is not a good measure of likely effects. What matters is the total traffic level,

THEME 2 –THE DOCUMENTS OF BBA RELEASED BY CPRE TO THE EXAMINATION

My observations on this bundle of documents will be under the following headings:

1) A single track methodology
2) The uncertainties list
3) Climate change

4) The policy environment
5) BCR's
6) Switch of consultants

A few preliminary remarks

Firstly, a word of gratitude is due to CPRE for submitting these documents to the examination.

And secondly, I do think that a word of reproach and puzzlement should go to Highways England for not submitting this documentation for scrutiny at this examination or as soon as it was prepared.

I note from the document themselves that the economic appraisal package is dated 26//07/2021 and two of the other documents are dated 12 / 11 / 2021 and that one document is undated. I must say that I have to assume that the vast majority of this work was done well before November.

I have skim read these documents. I am familiar with the subject matter and also with this type of document. I do not pretend to understand the more technical matters but I have found a quick examination of this bundle to be extremely illuminating and I hope that what I write below so is of use to you.

1 A SINGLE TRACK METHODOLOGY

The first thing the reader notes is just how monumental this work is the four documents total 788 pages. There are tables of different kinds of data, list of what data has been gathered paragraphs describing procedures or validating and cleaning the data and then for ensuring that results are accurate as accurate as can be.

The overall impression is one of a mature and all embracing process which has evolved over many years and has been refined to his present point of sophistication. It looks convincing, it looks like something to be relied on.

And in a way it is. Yes I believe that some cautionary remarks will be useful.

It is a machine for comp what is likely to happen if a road scheme is built with what is likely to happen if it is not built. Comparing, that is, in terms of how much traffic there will be on each link of the network.

It is very clever but it can only do one thing. It can can put figures on two different aspects of a proposed transport development and indeed it can be applied to rail Investments as well as Road. But it cannot begin to evaluate such things as an urban regeneration programme which might be more suitable as an investment for this area.

And thus it is useful for ranking transport linear transport schemes. It will provide you you with a BCR are arrived at with a precise methodology.

2) the uncertainties list

This is given at paragraph zzz. I am sorry the deadline looms and I cannot give the exact reference. The list includes the price of fuel, and I believe the likelihood of local developments happening. But amazingly the list does not include climate change or or the policy environment and the effects of that environment unlikely future traffic flows.

I do not think that this can be put down to a simple oversight. If you are I were writing down a list for such a document, a list of example uncertainties, you would put in the ones most likely to elicit a positive nod of response from the reader. The fact that climate change and the Policy Environment do not figure in the list reviews a serious gap in the mindset involved.

3) climate change

Clearly this must be near the top of anyone's list of uncertainties if you are contemplating building a new Road. Climate change has given rise to 3 major policy initiatives by the government in the field of transport in the last 8 months. These are the decarbonising transport plan, the net zero strategy and the first signs that the department for transport what are responding positively to the recommendations made in July to all departments of government by the committee for climate change as part of their 6th carbon budget review.

4 The policy environment

I have mentioned three major initiatives in the paragraph on climate change. Local government to is generating new plans and policies in response to climate change full stop high Peak Borough Council, derbyshire Dales Council thameside metropolitan Borough Council, manchester City Council, sheffield City Council, greater Manchester combined authority, all have climate change either plans or have declared a climate emergency or both. Again apologies that the deadline looms, or I would have put date and exact details onto all of those councils. Information is at climate emergency dot org, if I remember correctly.

These changes in the policy environment are massive and yet they do not rate a mention when the Uncertainties List is being written about in these documents. I was going to do a search on plant climate change and climate emergency on the bundle but again time is pressing. But the truth of what I am saying cannot really be argued with.

5 BCRs

It is just worth noting that this same methodology is reported as having been used to evaluate railfreight investment. I believe I have referred to this in my deadline to submission. The bcr for railfreight are far better than the bcr for the scheme, even before adjusting for the new value of carbon.

I should point out that this bundle reveals that the modellers used and estimate for a high carbon which was mi below what is actually turned out to be the increase in posed by the beis on all departments of government, which is a 4-fold. This tastes the original PCR for the scheme to approximately 1. That means that for £1 invested you get £1 back. I am not sure that is a good rate of return.

Of course there is the adjusted BCR and that would be round about 2 with the new carbon evaluation. I hope and trust that Highways England will produce new figures for the examination remembering too that there are carbon emissions embodied in the construction phase as well.

6 The switch of consultants

It is clearly stated in the documents in the bundle that possibly starting in 2018 and certainly in 2019 consultants BBA took over from the previous consultants, named ARCADIS.

Here is the quote:

7.3.1. Initial air quality (AQ) modelling undertaken by Arcadis in July 2018 indicated that an unmitigated TPU scheme could have significant AQ effects and jeopardise the application for development consent. Changes in traffic flow and speed as a result of the scheme were predicted to cause exceedances of the AQ strategy objectives for annual mean nitrogen dioxide (NO2). The primary locations where a negative AQ impact was reported were the village of Tintwistle (A628) and the specific locations on the A57 route through Dinting Vale and Glossop High Street, as shown in Figure 7-1

7.3.2. Atkins was commissioned by Highways England to undertake a review of the work done by consultants Arcadis at PCF Stage 3 for the proposed TPU scheme. The aim of this process was to strengthen the robustness of the modelling, under high levels of scrutiny for the Development Consent Order (DCO).

Following the presentation of the review findings in the summer of 2019, Atkins was commissioned to implement its recommendations and finalise PCF Stage 3.

7.3.3. As such, details of how the base model has been developed during the finalisation of PCF Stage 3 are provided in section 8, resulting model metrics are shown in section 9 and a summary is presented in section 10.

I will have to leave this to speak for itself!!

I would suggest that what exactly happened next should be subject to peer review; otherwise the examination cannot know the ins and outs of the many many changes which were made to the model . . . .

APPENDIX 1

Being a detailed look at a technical point to support my contentions a) that there may be something wrong with the model and its predictions and b) how the present comparisons which we are all faced with from he do not paint a true picture

PDNPA's LIR states:

A57 Snake Pass

"7.2.5 According to the Traffic Modelling data supplied as part of the DCO application, the A57 Snake Pass will see the following change in AADT traffic flows with the scheme compared to the 'Do-minimum' scenario in the opening year (2025): -
• A total increase of 1,150 motor vehicles (38%) and an increase of 11 HGVs (36%).
It is unclear from the model how the traffic will be dispersed eastwards from the A57 Snake Pass beyond the cordon point. Total vehicle flows are predicted to be 4,200 per day.

"7.2.6 The traffic model indicates the A57 Snake Pass will see the following change in AADT traffic flows with the scheme compared to the 'Do-minimum' scenario in the design year (2040): -
• A total increase of 1,450 motor vehicles (38%) and an increase of 14 HGVs (36%).
Total vehicle flows are predicted to be 5,300 per day"

DW comments:

There is a problem for the reader here. The 2 figures for the 2 years, the opening year and the design year, for the "increase" in traffic, when comparing DS with DM, ARE THE SAME, namely 38% (motor vehicles) and 36% (HGV's) - so the reader, including me, thinks, oh, it hasn't changed (i.e. between 2025 and 2040). But what is it? What exactly is it that hasn't changed?

I was confused because it looked as if 2025 and 2040 were "the same". But they absolutely are NOT the same. The TOTAL increase, when comparing DS with DM, goes up from 1150 motor vehicles to 1450.

Once again the use of percentages, and the use of COMPARISONS between DS and DM serves to confuse the true picture. Far better and more informative would be the use of ABSOLUTE figures, then the reader could

a) see the 2025 and the 2040 figures compared to baseline. This would tell us both what to expect in 2025 and what to expect in 2040 in a way we could understand, because we could relate them to what the situation is NOW, and this would reveal incidentally the increase in traffic which is predicted between those two years, and

b) we could still see the difference clearly between DS and DM.