



Satnam Proof of Evidence - **Rebuttal**

Additional Traffic Modelling

Produced by Jon Parr

Rule 6 Party

Peel Hall - APP/ M0655/W/17/3178530

Additional Traffic Modelling Satnam Proof of Evidence Rebuttal

1.0 INTRODUCTION

- 1.1 It should be noted from the outset that the Rule 6 Party do not agree with statements made within the various proofs of evidence of which there are many. More so in fact than their original submissions which begs the question, why this information wasn't provided from the outset.
- 1.2 We have previously queried with the Inspector as to the legitimacy of some of the information contained with the proofs from Mr Best (Modelling Group) and Mr Tighe (Highgate Transport) as we believe there is supplementary information contained within that bears no resemblance to VISSIM issues.
- 1.3 The following rebuttals made do not come from a technical position, but more a realistic position of having lived here for over 40 years and knowing full well the issues related to traffic right across the town.
- 1.4 Commentary against the proofs of evidence from this point forward, with exception of the conclusion shall be done in **red font**.

2.0 SPECIFIC REBUTTALS

2.1 Modelling Group Fig 8 - PM Peak 2032 Model screenshot showing operation of Cromwell Avenue (view from North to South)



This model/image does not reflect real world conditions. These roads are significantly busier now than this image suggests that they will be in a further 11 years' time, following 1,200 new homes. This is unrealistic and casts doubt over the starting position of MG's model.

2.2 Modelling Group Table 3.5 Journey Time Summary – Network AM Peak Analysis & Modelling Group Table 3.6 Journey Time Summary – Network PM Peak Analysis

AM 2032 - 08:00 - 09:00	A49 SB	A49 NB	M62 EB	M62 WB	Cromwell Avenue approach	Sandy Lane West approach	Long Lane approach	Hawley's Lane approach
Do Minimum	1014s	739s	721s	342s	317s	200s	587s	83s
Do Something (M4 Mit)	1102s	600s	743s	349s	359s	204s	633s	77s
Average Journey Time Difference (s)	88s	-139s	22s	8s	42s	3s	46s	-6s
Average Journey Time Difference (%)	9%	-19%	3%	2%	13%	2%	8%	-8%

PM 2032 - 17:00 - 18:00	A49 SB	A49 NB	M62 EB	M62 WB	Cromwell Avenue approach	Sandy Lane West approach	Long Lane approach	Hawley's Lane approach
Do Minimum	686s	757s	394s	324s	206s	140s	770s	314s
Do Something (M4 Mit)	564s	726s	430s	291s	178s	132s	701s	332s
Average Journey Time Difference (s)	-122s	-31s	36s	-33s	-28s	-9s	-68s	18s
Average Journey Time Difference (%)	-18%	-4%	9%	-10%	-14%	-6%	-9%	6%

Once again, we have to question the starting point of the model if we are to believe that mitigation via signal operations are likely to reduce overall journey times for A49 traffic by 2032 in both AM & PM scenarios.

2.3 Modelling Group Figure 2 – PM Peak 2032 Model screenshot (red cars are development traffic)



The model image shown above lacks any credibility. Existing traffic levels are already worse than this. We note there is no reference in the report to the AM Peak 2032 model. We would question the reason behind this.

2.4 MG Para 3.4 - The three figures on the following pages aim to demonstrate that there are existing conditions already responsible for creating delays within the present conditions, on the ground. There are multiple junctions within very close proximity to the Sandy Lane West top line at the A49, as can be seen in Figure 3. It can clearly be seen in the photograph (taken from Google StreetView) in Figure 4 that there are multiple conflicting movements, a situation confirmed by the large dataset of detailed TomTom-based journey time measurements used for validation. Figure 5 shows an aerial photograph taken in 2013, showing how recently the Aldi site was unoccupied.

Mr Best is absolutely correct in all three statements in so far as;

1. There are a series of junctions in close proximity that really do hinder flow of traffic. This wasn't always the case, but growing volumes of traffic over the last 10 years have steadily led to the position we currently find ourselves in. Queuing traffic back to and beyond Cotswold Road roundabout. We therefore do not accept that by completion of a 10 year build programme that the knock on effects from the proposed development would have little overall impact.
2. TomTom-based journey time measurements? Is this a design standard that holds any credibility?
3. The site was a Leisure Centre up until 2012 and even then access/egress was notoriously difficult. I'm not sure this has any relevance in the report nor does it justify the allowing development to exacerbate the situation further.

- 2.5 MG Para 3.51 – As is demonstrated in Figure 4.1 (a-e) in Dave Tighe’s supplementary evidence, historical average data taken from Google traffic supports that there is over 1,100m of aggregate queuing traffic approaching this junction now, in the current situation. Therefore, the queue lengths recorded in VISSIM are not considered to represent development impact that cannot be mitigated.

There is no timeline against these screenshots, these could have been taken ten years ago and are meaningless. Furthermore, they are insulting to the people that sit in this traffic day in day out.

- 2.6 In summary, it is considered that the results clearly demonstrate that the primary focus of ensuring minimal impact and continued or improved performance for traffic travelling on the strategic corridors of the A49 and M62 has been achieved.

We disagree, the effect of the Peel Hall Development will undoubtedly have a severe impact on the congestion to roads that feed into the A49 including Sandy Lane West, Calver Road, Long Lane & Hawleys Lane. These roads can not be allowed to suffer even further heavy delays as a result of keeping the A49 moving.

Likewise the A49 between J9 and Winwick again already suffers significant delays and with the impending introduction of Parkside, the only means by which to improve this would be an increase in green time which would further exacerbate queuing on the M62 J9 slip roads.



This screenshot from animation file ref APP38_0830_M62J9_TEST02 would suggest that traffic along this route is relatively free flowing and once again calls in to question the credibility of this model.



This is an image of what commuters regularly face at 8.30am of a morning. Image is A49 Winwick Link Road round about looking back towards M62 J9.

The Traffic at the M6 link road roundabout extends back beyond Hollins Lane and up Golborne Road beyond Middleton Lane as can be seen in the image below.



- 2.7 Highgate Transport VISSIM PoE – Para 1.17 item iii – For a development of 1,200 dwellings, the impact is small and concentrated at only a few locations i.e. Sandy Lane West, Long Lane.

Strongly disagree, that 'only' a few locations will have a small and concentrated impact. The knock on effect of traffic on Sandy Lane will be unbearable, it will continue to back up to Cotswold Road and beyond, it will affect Cotswold Road, Sandy Lane and Cleveland Road. Rat running will increase through narrow residential street such as Petworth Avenue, Mendip Avenue, Crowe Avenue, Hunter Avenue and Gough Avenue as people try to reduce the time they are sat in traffic.

The statement made by Mr Tighe is quite simply wrong.

- 2.8 In Para 2.1 of Mr Tighe's evidence he states Warrington is typical of towns and cities all over the country that must cope with huge pressure of development.....

Mr Tighe in the loose sense of the term is correct – there are pressures, not least being a landlocked site bounded by a motorway and already busy residential roads. But unlike a lot of New Town areas, Warrington has been left with a legacy of poor highway infrastructure that was promised and never delivered upon. Where most New Towns have a series of link-roads and/or bypasses, that isn't the case here. The majority of traffic in North Warrington makes its way from A to B via what are principally residential streets and that must be borne into consideration when thinking of road safety both now and 10 years into the future.

- 2.9 Finally, Mr Tighe has appended a report from KPMG with regards to Covid and its effects on towns, no doubt in the hope that this will ease long term traffic congestion. These are indeed unusual and unique times, but to suggest that the current situation is going to change long term habits can not be and should not be taken into account – it is purely speculative at this stage and carries no tried and tested merit.

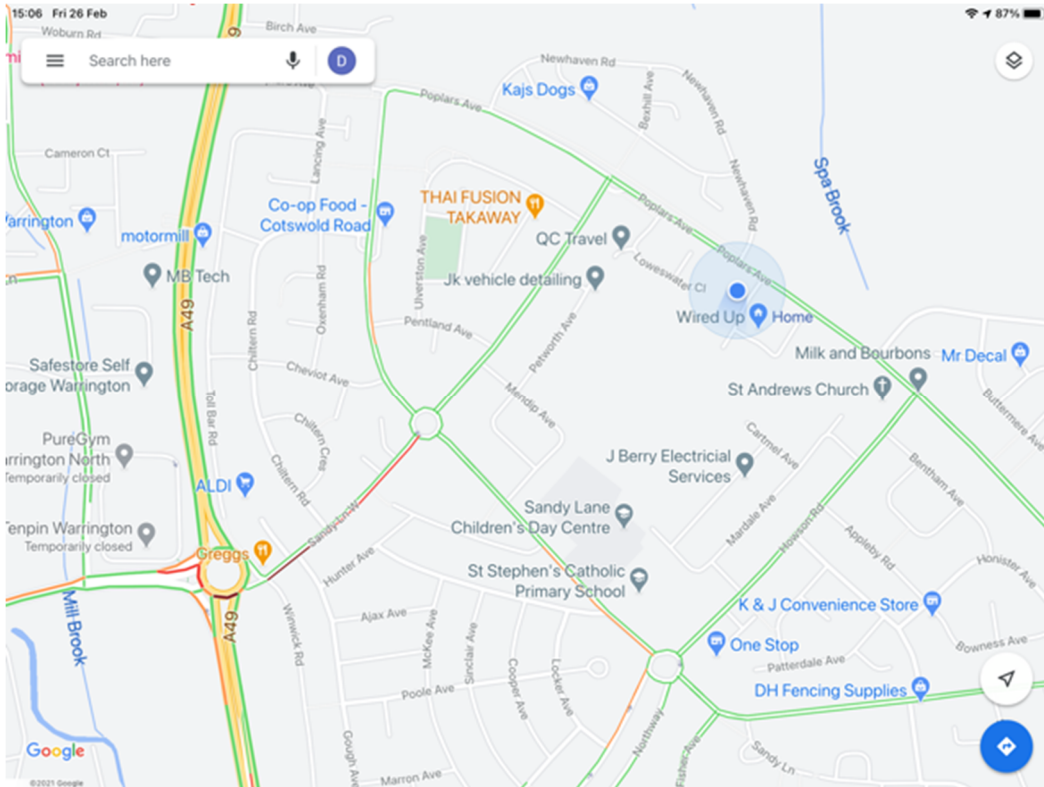
3.0 CONCLUSION

- 3.1 There is nothing in the proofs of evidence submitted that provides the Rule 6 Party with any confidence whatsoever that the effect on the local roads will be anything but severe.
- 3.2 The images and animations provided by The Modelling Group fail to bear any resemblance to current traffic conditions let alone what the likelihood of increased traffic will be in 2032.
- 3.3 On this basis we would question the accuracy of the model and its credibility in making a decision which thousands of local residents know to be unrealistic and highly inaccurate in a real world scenario.
- 3.4 To suggest that it is OK for these smaller roads to be further impacted upon, on the basis that they are already busy roads is wholly unacceptable and the appellants team of Professional Consultants should be thoroughly ashamed of the contempt with which they view existing local resident's wellbeing.
- 3.5 Throughout both Mr Tighe and Mr Best proofs, they try to incorrectly claim that there are 1100m of queues in the Poplars area already. They use a series of google screen grabs to reinforce this point.

Except there aren't queues of that size and never have been, in fact, queues in recent years have been nearer 300-500m, they do rightly point out however that they will continue to grow as the site is developed.

Within the evidence provided, the google screen grabs don't show any queues! They show traffic moving freely around the area, and it's simply baffling that they've tried to use these google maps to reinforce their point.

As an example, below is a google screen grab taken 3pm Friday 26th February. It may not have as much traffic on it as at peak times but in the main it bears an uncanny resemblance to the screen grabs in the report. Where there is a red line on Tighe's google screen shots it can generally be explained by cars parked outside people's houses. The red line outside the Coop is not a traffic jam but people shopping.



We would assert the google screen grabs don't have any technical, and should not be used to base a technical report on that has the ability to adversely affect thousands of residents.

- 3.6 The appellant's modelling has been helpfully translated into animated videos showing the traffic flows which the model generates. We are grateful to the appellant for providing these, as they demonstrate graphically a point which would be more difficult to visualise otherwise: that the appellant's modelling is critically flawed.

These videos show traffic flows which are significantly lighter than current traffic levels at these junctions, yet this is the output from a mathematical model which supposedly takes into consideration current traffic levels plus the additional traffic resulting from the build. The video animations clearly demonstrate that the underlying model is profoundly inaccurate and should be dismissed.

4.0 APPENDIX A – EMAIL COMMUNICATION REGARDING SUPPLEMENTARY

RE: Mr Tighe's SPOE

Skinner, Helen <HELEN.SKINNER@planninginspectorate.gov.uk>

Thu 25/02/2021 15:01

To: Jon Parr <jonparr@live.co.uk>

Cc: 'Hughes, Martha' <Martha.Hughes@warrington.gov.uk>; Colin Griffiths <colin@satnam.co.uk>; 'jim.sullivan@hotmail.co.uk' <jim.sullivan@hotmail.co.uk>; 'Clisby, Paul' <pclisby@warrington.gov.uk>; 'Taylor, Mike' <mike.taylor@warrington.gov.uk>

Thank you for all of your emails. Please rest assured everything is being passed on to the Inspector for her consideration.

Kind regards

Helen

Helen Skinner

Inquiries & Major Casework Team
The Planning Inspectorate

<https://www.gov.uk/government/organisations/planning-inspectorate>

Twitter: [@PINSgov](https://twitter.com/PINSgov)

Email: helen.skinner@planninginspectorate.gov.uk

Telephone: 0303 444 5531

From: Jon Parr <jonparr@live.co.uk>

Sent: 25 February 2021 14:51

To: Skinner, Helen <HELEN.SKINNER@planninginspectorate.gov.uk>

Cc: 'Hughes, Martha' <Martha.Hughes@warrington.gov.uk>; Colin Griffiths <colin@satnam.co.uk>; 'jim.sullivan@hotmail.co.uk' <jim.sullivan@hotmail.co.uk>; 'Clisby, Paul' <pclisby@warrington.gov.uk>; 'Taylor, Mike' <mike.taylor@warrington.gov.uk>

Subject: Re: Mr Tighe's SPOE

Dear Helen,

From a Rule 6 perspective, we aren't fully abreast of how these issues are usually resolved and what is or isn't correct protocol. We would look to yourselves on this matter and appreciate any guidance you could provide.

The reason behind the raising of our initial email yesterday was not to be disruptive to the inquiry process, but to try and fully understand what information should and should not be submitted post December 2nd and as such what information we are providing rebuttals against.

My understanding was that issue of information was to be confined solely to VISSIM related matters. Since of my email yesterday, Mr Griffiths has indicated that all current proofs will remain as currently issued. This does appear to be at odds with the direction all parties were clearly instructed given that there is information related to topics outside of VISSIM - KPMG's speculative report into Covid's impact on working practices etc. being just one case in point (refer to previous email for the remaining items).

At this stage we don't have the luxury of being able to wait any longer to conclude our rebuttals. You will appreciate that we work, and can therefore only respond in the evenings. We will ensure that our rebuttal is issued in line with the Inspector's timescales but would record our concern of Mr Griffith's suggestion that evidence (which in our opinion should not be submitted) will make its way to the Inquiry for discussion.

Kind Regards

Jon Parr

for and on behalf of the Rule 6 Party

From: Colin Griffiths <colin@satnam.co.uk>

Sent: 25 February 2021 13:02

To: 'Hughes, Martha' <Martha.Hughes@warrington.gov.uk>

Cc: 'Jon Parr' <jonparr@live.co.uk>; 'jim.sullivan@hotmail.co.uk' <jim.sullivan@hotmail.co.uk>; 'Skinner, Helen' <HELEN.SKINNER@planninginspectorate.gov.uk>; 'Clisby, Paul' <pclisby@warrington.gov.uk>; 'Taylor, Mike' <mike.taylor@warrington.gov.uk>

Subject: RE: Mr Tighe's SPOE

Martha, Helen,

We would suggest that the continual email exchanges on this topic are not productive, the respective standpoints are well set out. If the Council wish to continue with this topic they should do so at the inquiry.

Many thanks,

Regards

Colin

Satnam Group

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From: Hughes, Martha <Martha.Hughes@warrington.gov.uk>
Sent: 25 February 2021 11:39
To: Colin Griffiths <colin@satnam.co.uk>
Cc: 'Jon Parr' <jonparr@live.co.uk>; 'jim.sullivan@hotmail.co.uk' <jim.sullivan@hotmail.co.uk>; Skinner, Helen <HELEN.SKINNER@planninginspectorate.gov.uk>; Clisby, Paul <pclisby@warrington.gov.uk>; Taylor, Mike <mike.taylor@warrington.gov.uk>
Subject: FW: Mr Tighe's SPOE

Colin

As set out in my email of 22 Feb @ 16.54 (attached along with your response of 23.2.21) the Council considers that Mr Best's use of information data relating to the 2032 Do Minimum Without Signal Optimisation scenario was not available to the Council within the 2nd December submission.

The Council's view is that in your email below to the Rule 6 party and attached response to me yesterday you are applying a different interpretation to the Inspector's instructions that 'there should be no evidence presented that is based on modelling scenarios other than those submitted on 2 December.' Your email attached paraphrases the Inspector's words to state that evidence to be presented must be "based on modelling scenarios.....submitted on 2 December". This is not the instruction.

I have copied Helen Skinner into this email given the exchange yesterday and due to the different interpretation of the Inspector's instructions, it is considered that clarity would assist.

The council consider that the Inspector's instruction intended to make clear that no evidence should be presented from modelling scenarios other than those disclosed as part of the 2nd December 2021 future year modelling submission.

Furthermore, following WSP's email of the 4th December 2021 (attached with reply from Fiona Bennett 8.12.21) seeking clarity on matters relating to signal optimisation there was ample opportunity for this modelling and supporting documentation to have been disclosed ahead of the 14th December backstop date.

Kind regards

Martha Hughes
Principal Planning Officer

Development Management

East annexe

Town Hall

Sankey Street

Warrington WA1 1UH

01925 442 803

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From: Colin Griffiths [<mailto:colin@satnam.co.uk>]

Sent: 24 February 2021 19:58

To: Jon Parr <jonparr@live.co.uk>; Hughes, Martha <Martha.Hughes@warrington.gov.uk>; jim.sullivan@hotmail.co.uk; Taylor, Mike <mike.taylor@warrington.gov.uk>

Subject: Fwd: Mr Tighe's SPOE

Mr Parr,

I reply to you without PINs as the Inspector was clear yesterday, she did not want to hear on this topic again.

You appear to misunderstand the situation entirely.

1. The Inspector's clear position is as set out in her email of yesterday. The modelling of [the 2 December](#) is the final modelling for this appeal.

2. Mr Best's evidence is based entirely on that modelling, there is no new modelling. Where Mr Best refers to WSP he refers to their audit response to the earlier [2nd December](#) modelling.
3. Mr Tighe's evidence contains no modelling at all, he relies on Mr Best's modelling submitted up to [2ND December](#). The passages you refer to set the scene for the application of the VISSIM work on the local transportation network and are entirely relevant.

Sent from my iPhone

Begin forwarded message:

From: Jon Parr <jonparr@live.co.uk>
Date: 24 February 2021 at 15:38:28 GMT
To: "HELEN.SKINNER@planninginspectorate.gov.uk" <HELEN.SKINNER@planninginspectorate.gov.uk>
Cc: Jim Sullivan <jim.sullivan@hotmail.co.uk>, "Hughes, Martha" <Martha.Hughes@warrington.gov.uk>, Colin Griffiths <colin@satnam.co.uk>, "Taylor, Mike" <mike.taylor@warrington.gov.uk>
Subject: Mr Tighe's SPOE

Dear Helen,

We note in Mr Griffiths' email to Mr Clisby his statement that "Because no part of Mr Best's evidence falls outside the direction none will be withdrawn".

We have some queries about the appellant's proposed approach towards following the Inspector's guidance. I have set down the key concerns as they relate to Mr Best's evidence below:

- 2nd December - final VISSIM evidence from the appellant
- WSP undertake technical appraisal and identify a number of technical issues and produce a model summary
- 11th January - Technical Note 12 issued by WSP which includes the technical issues
- 10th February - The Modelling Group issue VISSIM POE. In this document they attempt to answer the technical issues raised by WSP in a series of paragraphs in Section 4 Matters Arising. Question iii Signal Optimisation is answered in Paragraph 4.14 onwards and reference is made in Paragraph 4.15 to:
 - 'Using data outputs available in the model and spreadsheet analysis supplied, an exercise to compile the model queue data outputs from all scenarios, for internal stoplines at M62 Junction 9, has been undertaken for the inquiry to show localised modelled performance. Details can be seen in Appendix LB/3 and LB/4.'

This all appears to indicate that Mr Best's evidence leans on work undertaken by WSP after the 2nd December modelling submission.

Mr Tighe's evidence also contains some work which appears to fall outside the remit indicated:

- Section 2 The Peel Hall Development in the Context of Warrington - is not related to VISSIM

- Figure 4.1 Existing Traffic Conditions (a-e) is related to residential streets and not the M62/A49 Corridor which is the only section of road VISSIM is concerned with.
- Figure 4.2 Bus Routes
- Appendix DT/V2 Warrington LTP4 Extracts
- Appendix DT/V8 - KPMG report RE Covid has no relevance to VISSIM and is new/additional evidence.

The Rule 6 Party is concerned that the evidence prepared by Warrington Borough Council will be ‘watered down’ as a consequence of the stance taken by the appellant and responded to by WBC, yet the appellant’s evidence may be allowed to remain complete – despite relying on extraneous information and on information gained subsequent to the modelling submission of 2nd December 2020.

Could you advise, please? Our view is that the appellant’s evidence does not fully comply with the Inspector’s instruction.

Kind Regards
Jon Parr

for and on behalf of The Rule 6 PARTY

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