

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** Wednesday, May 30, 2012 11:25 PM  
**To:** Heysham M6 link Road  
**Cc:** [REDACTED]  
**Subject:** NW TAR & CfBT Written repn. on HM6L for ExA, May 30, 2012 - Unique ref. [REDACTED]

Ms. Haddrell,

Attached please find a second joint written representation from the North West Transport Roundtable (NW TAR) and the Campaign for Better Transport (CfBT) (unique ref. no. [REDACTED]) for the Examining Authority in respect of the Heysham to M6 Link Road examination (case reference no. TR0 10008).

The first part of this rebuttal to Lancashire County Council's evidence (by NW TAR) is on transport appraisal (WebTAG).

The second part of this rebuttal (by CfBT) is on traffic growth.

[Regarding our request, lodged on May 8th, to participate in hearings](#)

NW TAR and CfBT trust that we have been registered to speak at the issue specific hearing on traffic flows and that we will be allowed to speak about planning and transport policy at the open floor hearings. Ideally, if the ExA is agreeable, Sian Berry would like to address him at the issue specific hearing and both of us would like to address him at the open floor hearings. Thank you.

Regards

Lillian Burns  
Convenor.  
North West Transport Roundtable

Home office:

[REDACTED]

Tel: [REDACTED]  
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**TAR**

**NW**

# Transport Activists' Roundtable North West

www.nwtar.org.uk

## NW TAR CORE GROUP

### Convenor:

**LILLIAN BURNS**

Director, TravelWatch NorthWest/  
CPRE NW Regional Group

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### Members:

**DAVID BUTLER**

CTC Right-to-Ride representative

t: [REDACTED]  
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**PETER COLLEY**

Federation of Cumbrian  
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**GRAEME SHERRIFF**

e: [REDACTED]

National Infrastructure Directorate,  
The Planning Inspectorate,  
Temple Quay House, Temple Quay,  
Bristol, BS1 6PN.

Wednesday, May 30<sup>th</sup>, 2012

Dear Mr. Rowbottom,

## **HEYSHAM - M6 LINK ROAD (HM6L) WRITTEN REPRESENTATION CASE REF. NO. TR010008. UNIQUE REFERENCE NO: [REDACTED]**

This is the second joint written representation to the Examining Authority (ExA) for the Heysham to M6 Link Road (HM6L) by the **North West Transport Roundtable (NW TAR)** and the **Campaign for Better Transport (CfBT)**.

We are responding in this submission to those areas of the written evidence by the scheme promoters, Lancashire County Council (LCC), which relate to the subject matters we tackled in our original written representations, ie. WebTAG (the Department for Transport's transport appraisal system) and traffic growth.

As with our initial written representation, this is in two parts. Part I is by the NW TAR and is about WebTAG (Web-based transport appraisal guidance) and Part 2 is about the flattening out of traffic growth.

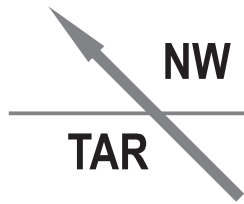
Also, as with our original submission, we have attempted – for the benefit of the examiner - not to duplicate evidence presented by other objectors. We trust that this collaboration on the part of environmental NGO objectors is helpful.

Whilst we have not replicated evidence, we do feel obliged to make known our support for complaints we are aware have been made by other participants in this examination process in relation to the presentation of evidence by LCC. We believe it is totally unreasonable to expect non-statutory bodies and individuals to be able to access, download and manipulate electronic files of 100 MB and more. The smallest LCC document, described as 'Steven McCreesh on behalf of Lancashire County Council', is 93 MB. The Lancashire County Council Written Representation (WR) Part 1 is 125 MB and the Lancashire County Council WR Part 2 is an extraordinary 285 MB in size. No apparent attempt has been made to compress these documents or break them down into digestible segments, and most pages are presented as images so the text is not searchable or copyable for reference. We have not lodged a formal complaint about this because we are aware that others have done so, but we felt we must raise this issue with you.

Yours sincerely,

**LILLIAN BURNS, Convenor, NW TAR (and on behalf of SIAN BERRY, CfBT)**

# **PART 1**



# Transport Activists' Roundtable

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## North West

www.nwtar.org.uk

**HEYSHAM TO M6 LINK ROAD (HM6L) – WRITTEN REPRESENTATION (WR) TO THE EXAMINING AUTHORITY (EXA) - FROM INTERESTED PARTY THE NORTH WEST TRANSPORT ROUNDTABLE**

**CASE REFERENCE NO. TR010008. UNIQUE REFERENCE:** [REDACTED]

### **PART 1**

#### **1. REBUTTAL EVIDENCE**

- 1.1 The NW TAR's first written representation focused on Lancashire County Council's (LCC's) disregard of WebTAG, the Department for Transport's (DfT's) web-based transport appraisal guidance, and the Council's failure to appraise proper alternative options to road building.
- 1.2 Our case has been borne out by a dismissive statement made by LCC in their key document 'Steven McCreesh on behalf of Lancashire County Council'. LCC maintain in that, their first written representation, that because the scheme predated the introduction of WebTAG, there was "nothing to be gained" from using it. The full context is:

*"The Scheme submitted to the IPC is for a Principal Route with similar characteristics of a Trunk Road and includes associated improvement works on the M6 Motorway. Therefore the DRMB is applicable and the most suitable.*

*WebTAG is also a DfT process and is used to develop the best solution from a variety of possible alternatives. The process for this Scheme predated WebTAG and was carried out in detail as shown in the ES; Volume 1, Part A, Report 4, 'Alternative Options'. This part of the ES demonstrates there was nothing to be achieved by returning to WebTAG for assessment and that the DMRB was the most suitable tool" (Paras. 4.8.5 and 4.8.6, page 26).*

- 1.3 The key points to make in response are:

- the Heysham to M6 Link Road (HM6L) is not a trunk road
- it is not for a local authority promoting a road scheme to decide whether or not it is minded to comply with WebTAG; it is required to
- the ES does not demonstrate that nothing is to be achieved by 'returning' to WebTAG (N.B. The use of the word 'returning' is slightly deceptive as it implies some use had been made of WebTAG previously and this was not the case) and
- the 'alternative options' that were examined were alternative road alignments because LCC made the assumption that a new road was what was required

As explained in our previous written representation, this modus operandi is completely at odds with both the approach required by the Treasury's Green Book and by the DfT's WebTAG.

## 2. UP-DATED WEBTAG DOCUMENTS

- 2.1 In our first written representation, NW TAR flagged up the fact that some of WebTAG's units were on the verge of being up-dated. In fact, up-dates to a number of the (expert) units appeared on the website almost simultaneously with the closing date for first written representations on HM6L. Following consultation, they were released 'In Draft', which means they will not be changed significantly before they become definitive in August this year. This state of affairs applies to the following, all of which apply to HM6L:-

**TAG Unit 3.5.4D:** Cost Benefit Analysis

**TAG Unit 3.5.9D:** The Treatment of Scheme Costs

**TAG Unit 3.3.2D:** The Noise Sub-Objective

**TAG Unit 3.3.3D:** The Air Quality Sub-Objective

**TAG Unit 3.3.5D:** The Greenhouse Gases Sub-Objective

**TAG Unit 3.4.1D:** The Accidents Sub-Objective

**TAG Unit 3.5.6D:** Values of time and operating costs

**TAG Unit 3.6.1D:** The Options Values Sub-Objective

**TAG Unit 3.14.1D:** Guidance on the Appraisal of Walking and Cycling Schemes

Meanwhile, the following are currently tagged as "coming soon":

**TAG Unit 3.9.5D:** Major Scheme Appraisal: Road Decongestion and

**TAG Unit 3.1.2D:** External Costs of Car Use in Rail Appraisal

(<http://www.dft.gov.uk/webtag/documents/draft.php>)

## 3. THE FUTURE OF WEBTAG

- 3.1 Also in our first written representation, NW TAR pointed out that a 'WebTAG 2' is on the way, having been consulted on recently.

It is apparent that the DfT foresees a long term future for the WebTAG system, primarily in order to demonstrate to the Treasury that it has in place a common mechanism of appraisal across all schemes. One of the leading publications for transport professionals, 'Local Transport Today' (LTT), has obviously spoken to the DfT about this and carries the following article in its current edition:

### **WebTAG to remain a requirement for majors**

LOCAL AUTHORITIES in England are likely to have to continue appraising major transport projects using the DfT's WebTAG appraisal guidance when major scheme funding is devolved from 2015.

The Local Government Association and the Royal Town Planning Institute/ Transport Planning Society have both called for councils to be given a free hand in how they appraise projects in a devolved environment (LTT 13 Apr).

The RTPI/ TPS said devolution should free councils of having to justify schemes on the basis of time savings – central to WebTAG appraisal – thereby enabling greater integration between transport and spatial planning.

But LTT understands the DfT is concerned that, without a common system of appraisal, it will not have the evidence to demonstrate the value for money of the major scheme programme to the Treasury. This, the DfT fears, could weaken its negotiating position with the Treasury in future spending reviews.

The Department is, however, considering giving authorities the freedom to develop their own bespoke appraisal methodologies which would be applied alongside a WebTAG appraisal (LTT597, 25 May, p.7)

#### **4. CONCLUSION & RECOMMENDATION**

4.1 LCC's attitude to the UK's appraisal system has been cavalier in the extreme and they should not be allowed to get away with such behaviour. Their application for permission to build the HM6L should be refused and they should be required to return to the first principles of the Green Book and WebTAG as an example to other local authorities who will, similarly, abuse the system if LCC are allowed to make up their own modus operandi without retribution.

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Lillian Burns, Convenor NW TAR, May 30, 2012

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## **PART 2**

**HEYSHAM – M6 LINK ROAD (HM6L) WRITTEN REPRESENTATION**  
**CASE REF. NO. TR010008. UNIQUE REFERENCE NO:** [REDACTED]  
(associated with interested party North West Transport Roundtable)  
**CASE REFERENCE NO. TR010008. UNIQUE REFERENCE:** [REDACTED])

*These comments are relevant to Questions 1 & 27 put by the Examining Authority in its examination timetable (rule 8 letter) of April 12, 2012. We would request these issues are considered further at the Issue Specific Hearing on traffic flows scheduled for July 12/13*

**1. PART 2 REBUTTAL EVIDENCE SUMMARY**

- 1.1 Campaign for Better Transport (CfBT) notes that no updated modelling of the Heysham M6 Link Road (HM6L) has been submitted by Lancashire County Council (LCC) in its written representation.<sup>1</sup>
- 1.2 With reference to our previous submission, we repeat our call for consideration of a future 'low traffic' scenario in the assessment of the level of need for the HM6L.
- 1.3 We assess LCC's claim that the 1.0% annual growth rate used in its modelling is a 'low' estimate and find that actual growth in the area in the three years since the modelling was done has been almost zero.
- 1.4 We refer to our previous detailed submission for a wide range of evidence that backs up the call for lower future traffic growth to be considered, and also present new evidence that confirms the DfT will be revisiting its forecasting models this year.
- 1.5 In order for this consideration to take place, an updated transport case for the road and a remodelling of the scheme must be carried out by LCC that uses a proper 'low traffic scenario' with future traffic levels that are significantly lower than currently put forward.

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<sup>1</sup> [http://infrastructure.planningportal.gov.uk/wp-content/ipc/uploads/projects/TR010008/2.%20Post-Submission/Representations/Written%20Representations/Redacted%20web%20ready/120508\\_TR010008\\_Written%20Representation%20from\\_Lancashire%20County%20Council.pdf](http://infrastructure.planningportal.gov.uk/wp-content/ipc/uploads/projects/TR010008/2.%20Post-Submission/Representations/Written%20Representations/Redacted%20web%20ready/120508_TR010008_Written%20Representation%20from_Lancashire%20County%20Council.pdf)



## UNABRIDGED EVIDENCE FROM CAMPAIGN FOR BETTER TRANSPORT

### 2. Lancashire County Council's written representation

2.1 Section 1.1.17 of written representation 2.3 from LCC (Traffic Flows) discusses the forecasting model used in the Forecasting and Modelling report dated and published April 2011.<sup>2</sup> No update to this report is provided, despite the fact that the report refers to modelling from 2010 that uses a base year of 2008 and validation carried out in 2008.

2.2 Section 1.1.18 gives more detail:

*"The estimation of the future year travel demand was based on the validated base year matrix. The principal source of traffic growth factors was the TEMPRO data set (version 6.1). Forecasts of freight traffic (LGV and HGV) were provided by the National Transport Model."*

2.3 Sections 1.3.17 to 1.3.19 discuss the issue of traffic growth further. These are quoted in full below, and we interpret these to mean that LCC considers its forecasts already to be 'low' and does not intend to revisit them.

*"1.3.17 For 2008-2014, traffic growth for the Do Minimum scheme ranges between 4.7% and 9.7% across the nine screenlines. The average growth is 6.4% (or 1.0% year on year). For 2008-2029 the range of traffic growth is 16.4% to 30.5% with the average growth computing to 24.5% (again 1.0% year on year).*

*1.3.18 Road Transport Forecasts 2011 (date January 2012) presents the latest results from the DfT's National Transport Model which produces forecasts of road traffic growth (England) up to 2035. This publication includes forecasts for Low and High demand scenarios between 2010 and 2035. For Low demand the forecast growth is 33.9% (or 1.2% year on year) and for High demand it is 55.1% (or 1.8% year on year).*

*1.3.19 It is, therefore, acknowledged that the forecast 1.0% year on year growth rate from the Heysham to M6 Link model falls outside the latest available growth envelope. However, regional forecasts (as provided in an Annex to the main publication) indicate a lower rate of traffic growth for North West England. Hence, it is highly probably that the equivalent Low demand forecast growth rate for North West England would be much closer to 1.0% year on year."*

2.4 We disagree strongly with this view and approach. Growth of 1.0% year on year is not low in comparison with what has actually happened to traffic growth, nationally and in the North West, since 2008.

2.5 As the DfT's traffic counts for Lancashire and the chart below obtained from the DfT's website clearly show,<sup>3</sup> traffic hardly changed between 2008 and 2010 in the county. Motor traffic miles on major roads increased marginally from 4,586,138,000 in 2008 to 4,588,192,000 in 2010, representing an annual growth rate of just 0.00022%.

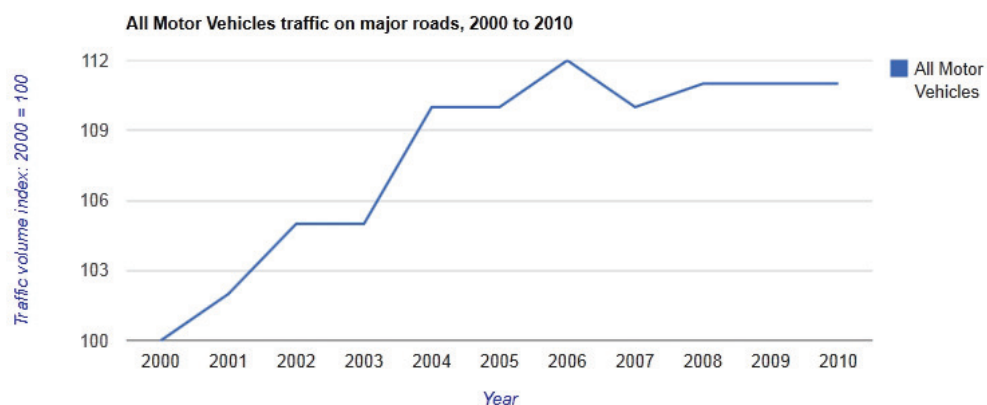
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<sup>2</sup> <http://www.lancashire.gov.uk/corporate/documents/heysham/Heysham%20Forecasting%20Report.pdf>

<sup>3</sup> <http://www.dft.gov.uk/traffic-counts/area.php?region=North+West&la=Lancashire>

## Lancashire: Index chart

2000 = 100



2.6 This trend for little or no growth looks set to continue. The provisional annual estimates of national traffic for 2011 show growth of 0.9% in Q4 compared with 2010, but the DfT's statistical release to accompany these figures cautions that this does not signal a return to higher growth. It says:<sup>4</sup>

*"Provisional estimates for 2011 show increases in traffic in the first and fourth quarters compared to the same quarters of 2010. However if the effects of snowfall in 2010 are removed, it is estimated that there would have been little change in traffic levels between these quarters of 2010 and 2011."*

2.7 Reasonably assuming, therefore, that 2011 was another year of low or no growth in the Lancashire area, any remodeling and revalidation carried out now would be almost certain to find that the 2008 model predictions for 2012 were already incorrect by more than 3%.

2.8 This evidence further strengthens the case for this new work on traffic models and forecasts to be done now.

### 3. Consistently wrong local and national road traffic forecasts need revising

3.1 As our previous submission set out (in section 2.6) there is clear evidence that national traffic forecasts for the UK have consistently over-estimated traffic growth and there is a near consensus among academics and transport and planning bodies that the methods and assumptions that go towards the National Transport Model (NTM), which underlies the DfT's road traffic forecasts, need to be revised.

3.2 We also described how that new work is being commissioned by a range of non-governmental organisations to examine these issues, and that this work would be submitted for use by the DfT in developing a new Roads Strategy later this year, and in future revisions of the NTM.

3.3 The Government made a further announcement about this Roads Strategy on 24 May 2012, in which it responded to the Cook report on the future of the strategic roads network. This response confirmed that work is being carried out on traffic forecasts and that the new strategy would be consulted upon towards the end of 2012. The response document says the strategy will need to set out:

<sup>4</sup> <http://assets.dft.gov.uk/statistics/releases/road-traffic-quarter-4-2011/road-traffic-estimates-quarter-4-2011.pdf>

*"the underlying trends in demand for roads, including setting out a range of alternative scenarios in line with wider work currently being carried out by the Department on transport futures."*

3.4 This reconfirms the need to regard these anticipated changes to national and regional traffic forecasts as significant and relevant issues in this examination and, once again, supports the need for an updated model that considers traffic levels that are considerably lower than the 'low' estimate currently put forward.

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May 30, 2012

Sian Berry  
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

  
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