

INTRODUCTION

Transport Solutions for Lancaster and Morecambe (TSLM) have commissioned an appraisal of the documentation supporting the Heysham-M6 Link Northern Route (NR) proposed by Lancashire County Council (LCC). This has been submitted to DfT for Programme Entry, as the preferred option for funding as a LTP major scheme, with a full Major Scheme Business Case (MSBC), and to LCC for the council to give itself planning permission.

This report is intended not to provide a full scale detailed scheme appraisal such as would be submitted as a proof of evidence for a public inquiry, but to highlight the main areas in which it is felt that the scheme justification is significantly flawed. These are considered under 8 headings:-

1. Failure to meet scheme objectives
2. Failure to follow guidance, in particular WebTAG guidance on option appraisal in the MSBC
3. Inconsistencies with regional objectives and priorities
4. Inadequate response to the outcome of aspects of the environmental appraisal
5. Failure to ensure adequate public consultation or to give appropriate recognition to high levels of local public opposition
6. Questionable traffic modelling
7. Questionable highway design solution, in particular at M6 junction
8. Implications of rising costs

The central failing of the project to date is the complete absence of real alternative options to a roads-led solution, perpetuating a now discredited belief that in an urban context major new road capacity can provide lasting relief to the existing network. This is part of a wider failing to follow the appraisal process set out in NATA and WebTAG, which undermines many aspects of the scheme and has contributed to its lack of public acceptance.

This report refers principally to the MSBC and Annexes, but will refer also to:-

- The Environmental Statement non-technical summary (NTS) Dec 2005
- RPG 13
- Regional prioritisation exercise for transport schemes in NW England
- Lancashire Structure Plan
- WebTAG

1. OBJECTIVES

The objectives of the NR are set out in MSBC A.4, and more helpfully bulleted in the NTS:

“The Heysham to M6 Link is considered to have four main purposes:

- a. Improving communications between Morecambe/Heysham and M6, including improving access to Heysham Port;
- b. Removing a significant volume of traffic from the Lune Bridges in Lancaster;
- c. Creating opportunities for the enhancement of alternative travel modes through the relief of current traffic conditions;
- d. Regeneration, both industrial and commercial.

These do not withstand scrutiny:

- ***Improved communications between Morecambe/ Heysham port and M6***

NTS section 2 states that traffic flows from Heysham port are 2000 AADT (this figure has not been found in the MSBC), of which 72% goes to the M6 and beyond ie 1440 AADT. This compares with baseline flows across the West Coast Main Line (WCML: proxy for peninsula screen line) of 56,500. Port traffic is 2.5% of all traffic entering and leaving the peninsula. It may enjoy improved journey times, at least for a while, but is only a very small part of the traffic problem.

The new road could benefit journeys from elsewhere in Morecambe/ Heysham to the M6, but no information on overall journey time reductions has been found, only time savings between the start and end points of the new road. Since the NR is likely to concentrate more traffic at a single arrival point for Morecambe than previously (when a significant proportion came down the A5105 coast road in a more diffuse travel pattern), it appears likely to cause more congestion on the feeder roads around this arrival point.

- ***Reduced congestion on existing network***

The MSBC claims reductions of 19-31% in traffic on the most important relieved routes (A683, Lune bridges). Even accepting these figures for a moment, it is questionable how significant the reductions are. Morecambe Road and the Lune bridges have been regarded as seriously congested for at least 20 years, so even the claimed reductions would only take traffic levels back to an earlier state of serious congestion perhaps 5-10 years ago. Unless congestion reduction crosses some meaningful threshold of change, it cannot be regarded as significant.

In any case there are good reasons to question the claimed reductions. Firstly, this comparison is between 2010 ‘Do-minimum’ (DM) and ‘Do-something’ (DS: preferred scheme). Compared with the baseline, which is the reference point for current congestion, most reductions on the A683 route are in the range 12-15%, apart from Greyhound Bridge at 25%.

Secondly, 2010 is the best level of reduction achieved. By 2025, again using LCC figures as most favourable to their case, reductions are in the range 1-6% compared with the present, again apart from Greyhound Bridge at 15%

Thirdly, there is a balancing effect of routes experiencing increased traffic levels, in some cases more significant than these relieved routes: for example (2010) Morecambe Road W of NR 34% increase, Oxcliffe Lane (B5273) 55%, A6 S of Slyne 107%.

Fourthly, even with an increase of 15% allowed for induced traffic effects, the modelling bears little relationship to experience of the effects of new road construction in congested urban contexts across the country in the past three decades. It is illusory to claim that a congested urban route like Morecambe Road, on which at least 80% of existing traffic remains because it has no use for the NR, will hold on to traffic reduction for 15 years, still less for 60 years (which is what the modelling assumes, since there is no change after 2025). The far more common experience is that traffic volumes return to 'before' levels in at most a few years, primarily because of release of suppressed demand.

Fifthly, there is a contradiction in the traffic forecasting, since the EIR claims 6,000 new jobs and 4,800 employees enabled to travel to work along the NR, purely as a result of the new road, but there is no equivalent traffic generation forecast because these effects are not in the development pipeline. To be consistent, some allowance must be made, or the regeneration claim dropped. (It is not credible to claim that some allowance has been made, since the DS scenario results in an 18% increase in traffic across the WCML 'screenline' compared with the DM, of which 15% has to be taken to be induced traffic, and 3% may be taken to be traffic generated by specified development in the DS compared with DM - see traffic forecasting report paras 7.1 and 8.1)

- ***Enhancement of alternative transport modes***

The MSBC and NTS claim that the NR will provide opportunities to enhance provision for walking, cycling, and public transport on relieved sections of road. There are few specific proposals, apart from the footway/ cycleway alongside the new road, which is optimistically claimed to enhance recreational walking and cycling!

There is a further suggestion that the NR would enable a bus lane along Caton Road to serve a possible Park and Ride site near J34. This is incorrect and misleading. Caton Road has one lane of traffic in each direction between the canal and the Lune bridges area, and could only accommodate a bus lane by widening the roadway. This may be possible as the road has wide and largely unused footways, but it is as possible without the NR as with it. In any case, even in the LCC forecasts Caton Road returns to its baseline traffic levels by 2025.

The same applies to most roads on the local network, including most of Morecambe Road. There are few opportunities to reallocate existing roadspace where significant traffic reductions are claimed for the NR. Most places where it could happen - for example the city centre one way systems - do not have meaningful traffic reductions: while others - for example the A5105 coast road - could probably already accommodate a bus/ cycle lane.

The assertion that reduced traffic levels on relieved roads will improve conditions for walkers and cyclists is equally untenable. Almost all relieved roads remain busy, and the effect on the walking/ cycling environment will be negligible.

The claims that the NR enables enhancement of walking, cycling, and public transport facilities are among the least convincing aspects of the MSBC.

- ***Regeneration benefits***

The EIR has not been assessed as yet, but such reports usually struggle to sustain arguments of regeneration benefit leading to thousands of jobs being created. The 1999 SACTRA report "Transport and the Economy" showed the lack of correlation between infrastructure provision and economic regeneration, so it certainly cannot be assumed.

The main problem with EIR assessments based on local survey is usually that businesses or landowners are asked for reactions in a completely cost-free and risk-free context, and it is easy to respond positively. Notably, there is no private funding available for the NR scheme,

because there are no specific developments directly linked to the road (NTS 1.5.7): it would be interesting to know the response of site owners who stand to benefit from the purportedly enhanced development potential of their land, to an argument that they should contribute to funding the road since it alone can unlock the added value of their site.

The argument that recruitment problems for businesses in Morecambe are due to access problems is suspect. These are predominantly low wage jobs in an area of plentiful cheap housing, and it is doubtful whether in this context many potential employees would accept travel costs and higher living costs in Lancaster or beyond, if only they could get to Morecambe a bit more easily. In low income areas it is more important to provide low cost practical non-car transport options than to build roads and lock low income households into car dependency.

2. OPTION APPRAISAL

There is no evidence at all in the MSBC of the process set out in WebTAG, of option identification, sequential appraisal, progressive elimination of options with an audit trail of the reasons for rejection, and arrival at a set of shortlisted options for final full appraisal. For this reason alone the scheme should be refused LTP Major Scheme Programme Entry (see WebTAG Unit 1.4 para 2.9.1 below), as there can be no confidence that the 'preferred scheme' is preferable to any other options or combinations of options.

WebTAG guidance on options

At the risk of overload, it is important to set out the relevant WebTAG guidance on option appraisal in full, in order to show how far short of the mark LCC's approach has been (bold type my emphasis).

TAG Unit 1.4

1.1.10 *The Department expects that the appraisal process is based on 'first principles' - the identification of the problems, the setting of objectives and the generation of options. **From a wide range of initial options considered, a submission should carry at least two options fully through appraisal, the preferred option and a lower cost alternative.** Large major schemes (>£20m) may also need to carry a 'next best' option through the appraisal process. This should be assessed against the NATA criteria. The 'next best' option should be the option which performs next best to the preferred option in terms of the NATA assessment.*

2.5.3 *For options discounted at an earlier stage ASTs and some worksheets will be required.*

2.9 Appraisal of alternatives

2.9.1 *The appraisal must include a detailed assessment of the scheme against alternative options that would, as far as possible, broadly meet the same objectives. **The testing of alternatives is not an add-on to the appraisal but an integral part of the process of determining the preferred option. Any major scheme for which the appraisal of alternative options is considered inadequate or where the Department considers alternative options to be preferable, will not be accepted for funding.***

2.9.2 *For public transport schemes options should include: different technologies, such as bus based schemes instead of light rail; or lower cost alternatives, such as bus lanes or shorter lengths of busways compared to fully segregated busways. **For highway schemes there should be a consideration of different link/junction standards and other alternatives to address the problems in the area, such as public transport provision, demand management policies, traffic management measures and strategies. Assessment of detailed option designs should form part of the sensitivity analysis in determining the optimum configuration of the scheme.***

2.9.3 ***The assessment of alternatives should start from an initial wide base of possible options. The Department requires a clear understanding of why some particular options are preferred to others.** Each option must be assessed against both local and central Government objectives, and in terms of the contribution to LTP objectives. **The assessment of alternatives must be sufficiently robust to allow a detailed comparison between the preferred scheme and its alternatives.** The Department may wish to see ASTs and worksheets (including TEE tables) for the rejected alternatives, though the level of detail provided in these ASTs and worksheets should be proportionate to the stage at which the rejected alternative was scoped out. ... For larger schemes the level of detail required for discounted options should be discussed with the Department on a case by case basis.*

2.9.4 **After a thorough justification has been given for the rejection of some of the initial set of options**, the Department requires that all major schemes move toward a final appraisal of the preferred option and a 'fully worked up' lower cost alternative. For larger majors (>£20m) a 'next best' alternative may also need to be carried through the appraisal process. In these cases promoters should enter into discussion with the Department to determine the exact requirements for their scheme.

TAG Unit 3.2:

Description of Other Options Considered

1.3.3 There is no space on the single page AST to include anything about the other options considered. Instead, **a separate single page should be prepared, providing a brief description of all rejected options and a summary of the reasons for their rejection.** The information provided should be self-explanatory, but concise.

1.3.4 This information about 'other' options should only be prepared at the stage of making the final choice between alternative strategies or plans. The sheet containing the information about the 'other' options should make clear what the options are called, along with the reference numbers which appear on their ASTs.

1.3.5 **Again, this information is a summary; a complete description of the details of the rejected options and their appraisals should be included in the supporting documentation.**

The April 2005 draft "Guidance to local authorities seeking DfT funding for transport Major Schemes" also included a summary on option development (section 1.5), which paraphrases WebTAG. Key phrases from this are set out below:-

- "The starting point ... Is to identify the problems to be addressed and the objectives that the bid would support"
- "The bid should not start from an assertion about a preferred modal solution"
- "The assessment of alternatives should start from an initial wide base of options"
- "(the Department) requires a clear understanding of why some particular options are preferred to others"
- "Scheme bids should demonstrate a clear path from identifying the problem to arriving at the preferred solution"
- "Appraisals ... Must include a detailed assessment of the scheme against the alternative options that would as far as possible broadly meet the same objectives"
- "The testing of alternatives is not an add-on to the appraisal but an integral part of the process of determining the preferred option"
- "Any major scheme for which the appraisal of alternative options is considered inadequate ... will not be accepted for funding"
- "For highway schemes there should be consideration of ... other alternatives to address the problems in the area, such as public transport provision, demand management policies, traffic management measures and strategies"

Although this was a consultation draft in July 2005, when the MSBC was submitted, its covering letter spells out that it was issued "in sufficient time to inform the development of bids for July 2005" and that "we would hope that authorities preparing bids for this July would find this a useful indication of our expectations".

MSBC approach

The MSBC section on options (A.5 "Options considered and implemented") opens with the words: "A.5.1 Introduction As well as proposing to complete the Heysham to M6 Link road, ..."

So much for "The bid should not start from an assertion about a preferred modal solution"!

Section A5 goes on to outline sustainable transport measures which LCC is undertaking, mostly independent of and in advance of the NR, and funded separately. Irrespective of the merits of

this loose package, it is **only one option** - a new major road linking the M6 with Heysham, alongside a generalised programme of measures for 'soft modes' and demand management which are not actually part of the option and will happen with or without the road. The sustainable transport programme is not remotely suggested to be an **alternative option** to the new road.

The only alternative options on offer are the 'next best option' and 'low cost option' (termed low cost alternative in WebTAG, abbreviated LCA), which are supposed to be shortlisted from a pool of alternative options; on the evidence of the MSBC, this pool is non-existent. The 'next best option' is the Heysham-M6 Link Western Route, in spite of it already having been comprehensively rejected several times between 1995 and 2004. As far as can be told from the MSBC, the LCA appears to be randomly generated, since the rather disjointed proposal has no prior distillation of options leading to rejection of some and an audit trail of rejected options, using ASTs to summarise the process as required by WebTAG, which might have explained where it came from.

The way the process is described in the MSBC leads to the unavoidable conclusion that a **new link road**, in LCC's sights since at least 1949, was the only serious option on the table, and even the LCA is what WebTAG terms an "add-on to the appraisal" (TAG Unit 1.4 para 2.9.1)

The only discussion of any genuine alternative option to a new road link refers to the assessment of public transport options in 1993 (MSBC A.5.2). That report was disputed at the time, is now out of date, and in contravention of WebTAG its findings are not detailed in the MSBC at a sufficient level to understand why it, or variations on it, should be rejected now. Given that both WebTAG and the new LTP major scheme guidance specifically call for public transport alternatives, or multi-modal options with an integrated public transport dimension, to be considered, it is unacceptable that no attempt has been made to develop such an option.

It is fairly easy to come up with 15 or 20 practical alternative options, including road-only, soft-mode only, on-line measures, and multi-modal either road-led or 'soft-mode'-led. There is no evidence that LCC has done this systematically, as required by WebTAG. Even if LCC were to claim it has done so, the MSBC would not be acceptable because it has not demonstrated the process by which the preferred option was reached.

Next best option and Low Cost Alternative

The selection of the Western Route as the next best option for full appraisal at the final stage of identification of the preferred route, is frankly bizarre. The MSBC describes the option as "unbuildable" (MSBC Annex A) on environmental grounds - principally impact on areas and species of the highest nature conservation status. The MSBC also reports the opinion of Leading Counsel to LCC in August 2004 that for these reasons a choice of the Western Route would be regarded "not only as extraordinary but one that was perverse on the part of the County Council" and that such a decision would be "lacking in logic and one that no reasonable planning authority properly directing itself could come to" (MSBC C.2.2: full opinion also printed in MSBC).

This legal opinion was given almost a full year before submission of the MSBC. Bearing in mind that "The 'next best' option should be the option which performs next best to the preferred option in terms of the NATA assessment" (TAG Unit 1.4, para 1.1.10), and biodiversity impacts are self-evidently part of the NATA assessment, it is nothing short of extraordinary that an unbuildable and legally perverse scheme choice could be classified as the 'next best option' to the Northern Route! Admittedly, it did not have much competition from the non-existent identified alternatives, but is it seriously being suggested that no other option could perform better than a completely unworkable one?

The LCA is a curious amalgam of new slip roads on the M6 junction 34 and on-line improvements to relatively short sections of roads north of the bridges. The origin of this scheme definition, and reasons for confining on-line improvements to a small part of the route, are unexplained. Again, there could have been at least 5 permutations of low-cost on-line improvements, with or without M6 slip road upgrades, and a sequential option appraisal would identify why one of these was judged to perform better than the others.

As it stands, the LCA is unsatisfactory. The bulk of the cost is undoubtedly in the M6 slip roads, which in isolation would be a Highways Agency responsibility, not a LTP scheme. These are in complete isolation from the rest of the LCA, and their upgrade offers little or no benefit to non-car modes, yet they constitute by far the largest proportion of LCA 'scheme' costs. It is therefore questionable why they should be in a LTP major scheme with so little else happening. One effect of their inclusion is to raise the scheme costs considerably, affecting the PVC significantly and thereby almost certainly the BCR. This may give a false impression of the efficacy of on-line improvements, but without the other on-line option appraisals which should be there under WebTAG, it is not possible to tell.

As discussed earlier, a bus lane (or possibly a bus and HGV lane) could fit along Caton Road, and there are several options for reconfiguring existing roadspace at the South end of the Lune bridges, all at relatively low cost. It is frankly not understood why a comprehensive on-line option, with real improvements for non-car modes, has not been developed as a potentially more appropriate LCA for a LTP major scheme.

Conclusion on option appraisal

In the light of the above, to accept the proposed NR scheme into Programme Entry on the basis presented by the MSBC would be a perverse application of the LTP major scheme guidance.

3. REGIONAL ISSUES

RPG 13

The MSBC claims conformity with RPG 13, both in many of the wider policies for economic and environmental well-being, and in relation to the specific transport policies. MSBC B.4.1-9 quotes certain policies and claims that the NR fully meets the policy objectives: but there is little in the policies that demands accessibility by road, and in the absence of appraisal of alternative options there is nothing in the MSBC to support a view that the NR **best** meets policy objectives relating to accessibility.

In relation to environmental policies, the MSBC makes a contentious claim (B.4.8) that the NR does not impact on any of the RPG policies on managing environmental resources, landscape character, built heritage, and biodiversity. Given that both English Heritage and the Environment Agency have objected to the planning application, this claim looks shaky; but it is also demonstrably wrong in relation to LCC's own appraisal:-

- Landscape impacts under NATA are never less than 'moderate adverse', at times 'large adverse', and under WebTAG even moderate adverse is already a significant impact. RPG policy ER2 specifies conservation and enhancement of "landscape and their settings (sic) which are of regional and sub regional importance but not covered by national designation...."
- The cultural heritage appraisal is all over the place, to the extent that English Heritage have requested deferral of the planning application: but even so, it has identified moderate adverse impact on nationally protected built heritage (RPG 13 ER3)
- The biodiversity appraisal has identified destruction of nationally important species (although on an undesignated site); "critical negative" impact due to loss of hedgerows (not a NATA term, probably equivalent to 'serious adverse'); and moderate adverse impact on bats, protected species under Habitats Directive (RPG ER 5)

In relation to transport policies, the MSBC claims of conformity are even more suspect. This section of RPG 13 states that transport development should:-

- make best use of existing transport infrastructure (T1 et al)
- incorporate all modes into transport solutions (para 10.2)
- recognise that building new roads to accommodate future traffic growth is neither environmentally nor economically sustainable (para 10.3: NB all modelling/ economic appraisal in the MSBC is predicated on future traffic growth)
- emphasise the role of walking, cycling, and public transport (para 10.3)
- only consider roads after a thorough examination of all possible solutions (T3)
- specifically for ports access, presume in favour of best use of existing infrastructure and use all available options to secure modal transfer (T6)

The MSBC's main defence is that it has looked at all possible solutions before considering the road solution, and makes use of existing infrastructure where possible, but in this case anything less than the new road is "sub-optimal". The defence fails because of the lack of evidence that other solutions have been examined at all, let alone thoroughly. In relation to T6, there is no evidence whatsoever of attempts to secure modal transfer as part of a solution which enables best use of existing infrastructure, merely unsubstantiated assertions that it would not do enough to obviate the need for the new road.

Regional priorities

RPG 13 expresses a regional priority to deliver "An improved road link between Heysham and the M6" as one of the "transport proposals of regional significance that should be delivered by

2007 as a matter of priority” (RPG 13 Table 10.2). If this were to mean a “new road link”, it would be inconsistent with the RPG’s own transport policies: it is scarcely possible only to consider roads after all other solutions have been thoroughly examined if a road has to be built as a top short-term priority. However, the priority is for an “improved road link”: RPG 13 neither demands nor in itself justifies the NR proposal, which is no more than one option for improving the road link.

A more recent prioritisation exercise has been the NWRA “Methodology for Determining Regional Transport Priorities in the North West” by JMP, draft report December 2005. Although this report raises several doubts about the methodology used for regional prioritisation, it comes to some interesting conclusions:-

- Most top priority are projects are public transport interventions, and highway schemes generally ranked much lower (summary, para 6.6)
- Most interventions in the top priority quartile are for the major urban areas of Greater Manchester, Merseyside, and Central Lancashire
- The Heysham-M6 link was not a top quartile scheme in the original prioritisation exercise; it reportedly came in as the top second-quartile priority when one of the top quartile schemes was shelved

In other words, the NR can be fairly precisely defined as exactly one quarter of the way down the regional priority list, the 18th priority out of 72 proposed transport schemes. This is rather different from the alternative version, that it is amongst the top priority schemes in the NW. It is also rather different from RPG 13, which classed “an improved road link between Heysham and the M6 as one of 7 priorities for early implementation.

In summary, neither RPG 13 nor the recent regional prioritisation exercise can be invoked to justify proceeding with the NR. It is one option for meeting the stated RPG 13 priority, but the MSBC has failed to establish it as the preferred option, and cannot rely on regional policy to make the case. The JMP report if anything reduces the priority status of improved road access to Heysham, and suggests that public transport interventions are more likely to achieve priority status in the context of regional sustainable development.

4. ENVIRONMENTAL APPRAISAL

The MSBC presents ASTs and worksheets for the NR and the LCA, as required by the NATA/ WebTAG approach. There are two main areas of problem, in the use of the appraisal to inform outcomes, and in some of the content.

Outcomes

Although the MSBC expresses a preference on environmental grounds for the Northern Route over the Western Route - scarcely difficult given the Leading Counsel opinion on the latter - there is little reaction in it to appraisal outcomes on the NR in itself. Several areas of large or moderate environmental impact are identified, most notably in landscape/ townscape impact since the road cuts across the grain of an intricate landscape, almost constantly in deep cutting or on high embankments, and has serious impacts (though understated in the AST) passing alongside or through residential areas on the high embankments.

There is however no discussion on the relative weight of these appraisals against other aspects of the overall appraisal, or in comparison with the admittedly limited and flawed LCA option. They are little more than reported consequences of the necessary construction of the preferred scheme. This reinforces the perception that the appraisal started out with not only a preferred mode, but a preferred solution.

Content

There are many unsatisfactory details in the AST and worksheets for the preferred option. The most important of these are summarised below:-

- Noise: the absence of reporting in the AST or worksheets of the more than doubling of noise levels at the Crematorium, is a major omission and cause for concern. The ES reports rises of 10-15 dB(A) at this highly sensitive and currently peaceful location.
- Landscape/ Townscape: the balance of overall assessment tends more towards large than moderate adverse impact (the AST hedges its bets by assessing as “moderate to large adverse”!). The worksheets indicate several landscape areas with large adverse impacts either individually or cumulatively, and in one case a description clearly fits the ‘large’ criteria but is classed as ‘moderate’. The townscape impacts on Torrisholme, Scale Hall, and the northern edge of Lancaster are understated as ‘moderate to large adverse’: the road, largely on high embankment, not only intrudes on the setting of the residential areas, it damages the relationship of these housing areas to their adjacent countryside. These are significant negative environmental impacts and should be accorded more weight in the overall scheme appraisal.
- Heritage of Historic Resources: the worksheets are of questionable competence, making the AST of little use. There is no description of features to enable a reader to affirm “what matters and why”: important sites and their impact assessments are lumped together regardless of their nature and location, and it becomes impossible to work out what applies to what: site designations are included in the Description column (where they provide the only information under ‘Form’ of features!) instead of the Significance column: and entries are frequently banal (“All scheduled monuments are likely to be rare”), vague (“some will be unaffected while others will face disturbance”), inaccurate (“Grade II listed buildings are of local interest”), and repetitive. There is little sign of understanding of what is wanted by way of information in each worksheet box (in the complexity/ significance box the entry reads “no sites of great complexity are scheduled or listed”)

It is little wonder that English Heritage have been severely critical of the appraisal under cultural heritage, though probably based on the ES accompanying the planning application which is of similarly poor quality, leading to the request for the application to be withdrawn.

- Biodiversity: worksheets have not been produced, which somewhat defeats the object of the systematic and consistent approach of NATA. A comprehensive assessment report has been presented, using its own assessment scales, but at least the information is there. The main problem is that the overall assessment of 'slight adverse impact' does not reflect the findings of the report. There is habitat loss for a nationally significant fungus, serious adverse impact of hedgerow loss and severance of corridors, and moderate adverse impact on bats, which are important protected species. It is not reasonable to discount these significant impacts against a range of mundane impacts and conclude an overall 'slight adverse' outcome: the guidance specifically discusses the 'most negative outcome rule'.
- Physical fitness: there is no evidence in the worksheet to support the AST entry or the 'moderate beneficial' assessment. The footway/ cycleway alongside the NR will be an unattractive environment for pedestrians and cyclists and is especially unlikely to have much recreational potential as claimed.
- Transport interchange: the Caton Road park and ride site is not part of the scheme and is not even enabled if the scheme goes ahead: it cannot be assessed as a scheme benefit
- Other government policies: it is absurd to claim that the scheme supports PPG 13 and does not hinder it in any way. Road construction promotes car use, and a scheme with induced traffic effects cannot be said to be encouraging reduced reliance on the car. As discussed in section 1 of this report, the scheme does little to promote or improve non-car modes of transport, so cannot even claim a balance of adverse and beneficial aspects under PPG13.

5. PUBLIC CONSULTATION

WebTAG

WebTAG places great importance on public acceptability of schemes, and the NATA process incorporates a high degree of public involvement from early stages. Public involvement happens at three key stages in a NATA appraisal, set out in the Study Approach framework diagram (TAG Unit 1.1 Fig 1):

- Stage 4. consultation, participation, information: This is a key stage, following identification of Government and local objectives, and understanding current and future situations: it establishes views on problems and objectives, and **leads to** the identification of options and feeds into the appraisal framework and procedures
- Stage 6.4. practicality and public acceptability in the “Supplementary issues” appraisal strand: this is a standard part of the appraisal, detailed in TAG units 1.4 and 2.5
- Stage 11. Consultations between the identification of front runners and rejected options in stage 10, and the identification of the preferred option or options at stage 12

Public involvement is therefore deeply embedded in the process, and is considerably more than presenting the preferred scheme and asking for expressions of support or opposition. This is in line with current thinking on public participation, that it is preferable to have public support through engagement at the outset rather than fighting public opposition in costly and time consuming processes in the latter stages (given that GOMMMS came up with this framework in 2000, it can claim to be one of the pioneers of this approach).

The key elements of public participation in the NATA process are:-

- Involvement in the identification of objectives and potential solutions, feeding into the crucial option identification stage: the public should be able to propose options as part of the initial trawl to establish a wide-ranging pool of options, which should be carried forward to the option definition and testing stages
- An active part of the appraisal process, as an element in one of the four NATA appraisal strands
- Review role **before** preferred options (preferred, next-best, and LCA) are finalised, giving the opportunity to input into the final selection of front runner and rejected options, and to scrutinise the reasons behind the choices made

TSLM have expressed their dissatisfaction with the consultation process leading up to submission of the preferred scheme, but it appears that the failings in public participation may be more systematic than the criticisms to date. There is no evidence of significant public involvement at Stage 4, and the lack of wide-ranging alternative options in the appraisal process speaks for itself - TSLM and others have many constructive alternative options to the NR, but there is no indication that these were ever contemplated for inclusion by LCC in the formal appraisal process.

There is also little doubt that Stage 11 happened after Stage 12, not before it. Public consultation was about the preferred route, initially without even the LCA as far as is understood. The question asked was not “Do you agree that the NR should be the preferred option, and with the reasons for rejecting other options?”, but “This is the preferred option - what do you think of it?”.

This failure is profound, and is probably a significant reason why the scheme has such a high level of local opposition at a critical stage in its development.

6. TRAFFIC MODELLING

There is too much detail in this subject area to cover comprehensively in the present report. A few central concerns can be summarised:-

- The contention that congested urban roads can sustain traffic reduction after reassignment, for 15 years or more, flies in the face of all recent experience of induced traffic effects. It is futile for LCC to pretend that it can, uniquely, build its way out of congestion.
The modelling does not factor in the effects of job creation on the peninsula, and increased opportunities for peninsula residents to access work elsewhere, claimed in the EIR. The latter alone would increase trips across the WCML 'screenline' by almost 10,000 per day. These are 'generated' not 'induced' trips (as defined in SACTRA 1994) in terms of induced traffic assessment, so should not form part of the induced traffic calculation done by LCC.
- There are inconsistencies between analysis of the preferred route and the LCA. For example, the LCA is said to increase traffic accidents because reassigning traffic would be travelling longer distances, and being partly on faster roads (M6) the severity of accidents would increase: both these statements apply equally to the NR, in addition to which there would be at least 15% more traffic on the network.
- The Local Model Validation Report is far from reassuring that modelled flows accord with observed flows. In some cases the correspondence is not within DMRB criteria, and in virtually every scenario tested there are significant individual discrepancies of well over 10%, up to 40% (A6 Slyne southbound AM peak). The LMVR consistently comments that modelled traffic speeds are slightly too high.
- Although it is rare for traffic models to show internal inconsistencies, it is difficult to see how there is enough reassigned/ induced traffic at M6 J34 to provide 32,000 AADF on the first section of the NR (2010 DS) west from J34. The combined total of 'extra' traffic on the M6 N and S, and the A683 E of J34, plus the reassigned (reduced flow) traffic from A683 W of J34, is 27,700, and not all of this would necessarily end up on the NR.
- Some forecast flows appear anomalous in the light of local knowledge (having grown up on the A683 7 miles east of the M6, I find the 42.7% jump in forecast flows E of J34 in the 2010 DS compared with DM particularly anomalous; it is also disquieting, due to the environmental effects on villages along the A683, which have not been factored into the scheme appraisal). As with all matrix-generated modelling, there is a need for a descriptive analysis of what is happening and why, if lay people are to be persuaded that the modelling is a reasonable representation of their real world.

7. HIGHWAY DESIGN AT M6 JUNCTION 34

Although highway junction design is not an area of personal expertise, the proposed arrangements at the M6 should not pass unchallenged: as a convoluted solution to a motorway T-junction it can have few equals, and is clearly a significant element in the very high scheme cost of £118 million (including optimism bias) for a 4.8km length of road. The southbound M6 exit to the NR - over the river, round a cloverleaf exit, under the motorway, turn right across a major stream of traffic coming out of Lancaster, back across the river, arriving 2.5km later at the roundabout 150m from the motorway - is especially contorted. Speaking as a design professional, when a design solution is as contrived as this, it is invariably not the best solution.

8. COST ISSUES

Value for money assessment

The MSBC bases its value for money (VfM) assessment on a high BCR, the monetary value of the 6,000 new jobs claimed to be created as a result of the NR (MSBC C.1.3), and the monetised negative values of small increases in Co2 and pollution emissions.

WebTAG states in several places that VfM is not just a case of monetised benefit, but of 'overall net value'. In the section of Tag Unit 2.5 headed "Assessing the overall value for money of the option", the first paragraph (1.2.12) summarises this point:-

"The table of impacts in the AST will contain all the significant costs and benefits of an option ... The balance of this information gives the 'overall net value' of the option. It takes account of all factors, not just the economic worth, and also takes account of all kinds of impact, both monetised and non-monetised, and qualitative as well as quantitative information."

The MSBC VfM statement falls well short of providing a 'net overall value': this is in effect an expression of the earlier criticism that the appraisal has done no more than report on adverse environmental impacts, rather than evaluate them.

Elsewhere, TAG discusses at length the weight to be attached to BCRs. This topic is introduced in the same section as above (para 1.2.14) which emphasises that VfM will be based on a comparison of costs to the public sector with the 'overall net value', rather than the BCR approach prior to 2003. TAG Unit 1.3 (para 2.1.4) contains specific advice not to overvalue BCRs:-

"The New Approach To Appraisal thus makes it easier to promote solutions that have the best overall justification. Specific implications of a rounded approach are as follows:

- ...
- *There is no requirement to maximise a project's monetised benefit to cost ratio. Impacts that are not in money terms should be given the same consideration as those in money terms.*
- *Nor is there a requirement to achieve a specific benefit to cost ratio. A minimum benefit to cost ratio of one will normally be expected for schemes that focus on providing benefits for motorised road users⁽²⁾. For projects that are not primarily intended to improve conditions for motorised road users - e.g. pedestrian facilities, landscape improvements or noise barriers - benefit to cost ratios of less than one may be appropriate."*

Affordability

WebTAG also contains the advice that:-

- "Affordability to Government will often be a critical factor in deciding whether options are realistic and practical" (Unit 2.5 para 1.2.14)
- authorities will be expected to minimise costs to the public sector by securing funding from elsewhere (Unit 1.4 para 2.11.3)

The current estimated scheme cost, including optimism bias, is £118 million for 4.8km, and LCC has not secured any funding from outside the public sector.

Cost increases

Apart from the endemic problem of scheme cost inflation presently afflicting almost all infrastructure projects, the NR has run into a specific problem of objection by the Environment Agency, including a requirement to locate bridge piers at the Lune crossing at least 8m from the river bank. This is not an unimportant stipulation, given the quality of the River Lune and its

conservation status. Compliance with this condition will increase the span length by 16m, which will not be a trivial increase in scheme costs.

The 2005 draft guidance on LTP major schemes indicates that central government “will be unlikely to support (increases) arising from poor project planning and management by the local authority” (guidance para 4.5.1), will expect the authority to find additional funding, and will consider funding increases on merit, most likely where increased costs could not have been anticipated, and then only to a maximum of 75%.

While the cost increase on the bridge has arisen before an approval for Programme Entry, it is exactly the sort of increase which central government is trying to squeeze out of the system. Whatever the details, it is clear that there was inadequate consultation with the EA (although the faults could lie with either side, or both) if such a problem, relating to a top value environmental asset like the River Lune, only came to light several months after completion of the MSBC and NATA appraisal.

Cost issues summary

It is for government to decide whether £118+ million on a 4.8km stretch of road, with some significant adverse impacts, represents good value for money in what it delivers in overall net value. In my view, £118 million could deliver far more in an option led by soft modes and demand management, with judicious increases in existing roadspace at key locations, and the delivery would be more in line with the sustainable transport thrust of current government policy. Unfortunately, this assertion cannot be tested at present, because LCC did not develop such an option to a level of definition that would have enabled it to be tested against the NR in the development of a preferred option for the LTP major scheme.

Alan James
15 March 2006

Appendix

TSLM's case on lack of consultation:

There has been no meaningful public consultation following the release of detailed proposals.

Lancashire County Council claim public support for the scheme by a MORI poll conducted in 2001, before any detailed plans were published. It claims the poll shows that 79% wanted a link road, but the actual support for the northern route was: 16% strongly support and 28% tend to support. Only road-building alternatives were offered ("a bypass, or nothing"). The same poll showed only 15% wanted to build roads, as a major transport priority, whereas 42% wanted to improve public transport and other alternatives to the car.

Since the detailed plans were revealed, the only measure of public opinion is a questionnaire organised by LCC following their exhibitions in May 2005. When people were asked about their support for the scheme, the answers were: Strongly support 15.5%, support 5.0%, oppose 7.8%, and strongly oppose 68.6%. So 76% of people, having seen the plans, were opposed to the building of the road.

Opposition to the road shows no sign of abating. There have been over 600 objections in early 2006 to the planning application.

The exhibitions were held "to inform the public about the proposals", although LCC now describes them as consultations. TSLM were specifically denied the opportunity to present alternatives to the plan. The exhibitions were poorly advertised, and conducted as a showcase for the scheme. No reference to any Low-Cost Option was ever presented for consultation prior to its inclusion in the Major Scheme Business Case.

At the exhibitions, many objections were made, but only one significant alteration was made (underpass on Torrisholme Road), which resulted in further adverse impacts due to the raising of embankment heights. Again, no alternatives to building a road were offered.

Far from welcoming public involvement, the MSBC dismissed public opposition, making several breathtaking assumptions, as "*Problems of a vocal minority who oppose the scheme against the (historical) majority who support the scheme, but remain silent because the County Council are proposing what they require.*" (D.4. Stakeholder Analysis, D.4.1. Communication Plan)

David Gate
16 March 2006