

Proof of Evidence:

Local Economic Impacts

**Presented to the Public Inquiry
in relation to
Lancashire County Council Planning
Application Reference: 11/05/1584
Completion of the Heysham to M6 Link**

Planning Inspectorate Reference:

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APP/Q2371/V/07/1200929

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Transport Solutions for Lancaster and Morecambe (TSLM)

1.0 INTRODUCTION

1.1 My name is Alan James. I have a Bsc (Hons) in geography, and MA in Landscape Architecture. I am a fully qualified landscape architect and a Member of the Landscape Institute (MLI), and have for eleven years worked as a transport consultant specialising in sustainable transport. I grew up in the Lancaster area, and lived in Lancaster for 12 years through the 1980s, so am very familiar with the development context.

1.2 Local economic benefits and regeneration effects are important in both landscape and transport activities, and I have a background in economics (A level) and economic geography, which informs my professional activities. I have experience in analysing economic impact appraisals, including evidence at the South-West Regional Planning Guidance Examination in Public in 2000; analysis of the Atlantic Consultants report on "Economic impact of mid-Cornwall road and rail investment" (2000), mostly about the upgrade of the A30 Bodmin-Indian Queens; subsequent evidence on the Economic Impact Report for the A30 Bodmin-Indian Queens inquiry (2004); and evaluation of claimed local economic benefits of the High and Low Newton bypass (2006). I am conversant with the 1999 SACTRA report "Transport and the Economy", as a key document in sustainable transport theory and practice. So, though not a specialist in the field, I am very familiar with the arguments presented in economic impact appraisals.

1.3 At this Inquiry I am appearing as a witness on behalf of Transport Solutions for Lancaster and Morecambe, covering local economic impacts in this proof of evidence and options, alternatives, and national guidance in a separate proof.

1.4 This proof of evidence will primarily address the Secretary of State's matter c) in the call-in letter of 8 February 2007:

"The extent to which the proposed development is consistent with Government policies in Planning Policy Statement 1: Delivering Sustainable Development and its emphasis on the importance of sustainable development as the core principle underpinning the planning system. In particular, the requirement to reduce the need to travel and encourage accessible public transport provision, to secure more sustainable patterns of transport development, should be considered, together with the Government's commitment to promote a strong, stable and productive economy that aims to bring jobs and prosperity for all".

1.5 Lancashire County Council (LCC) seeks to argue that the road will unlock employment sites, improve accessibility to employment both within and outwith the regeneration area of Lancaster District (RA), and is a vital component in tourism development in Morecambe. This proof will examine:

- The extent to which LCC demonstrates delivery of these benefits
- The extent to which any such benefits are delivered sustainably
- Whether the scheme is needed for these benefits to flow

1.6 The main LCC document to which reference will be made is the Economic Impact Report prepared by Faber Maunsell on behalf of LCC, revised version December 2006 (EIR). The original July 2005 version of this report formed Annex B of the Major Scheme Business Case (MSBC) for the Heysham-M6 Link (HM6L) in July 2005. The two documents are more or less identical apart from a dramatic revision of the employment generation forecast, from 6,014 to 1,822, due to a fundamental error in the basis of calculation (the original appears to have used total site area instead of gross floor area of premises in its calculation of m2 per job). This revision has significantly reduced the regeneration benefits in the Value for Money assessment in the MSBC, from £162 million to around £49 million, even before the validity of the 1,822 figure is questioned.

1.7 Reference will also be made to:

- SACTRA 1999; Transport and the Economy
- Lancaster City Council Statement of Case
- The Atlantic Consultants report in 2000 on the A30 (see 1.2 above)
- My evaluation of the Atlantic Consultants report, unpublished ca 2002
- Presentation by Andy Nash, former Executive Director of San Francisco County Transportation Authority, Transform Scotland conference 22/4/02 - "*Freeway demolition and economic regeneration in San Francisco*"

2.0 SUMMARY OF ISSUES

2.1 This proof considers the two main elements of local economic impact:

- The purported role of the HM6L in the revival of tourism in Morecambe. Although not expressed directly in the LCC Statement of Case, there is reference to the improvement in transport assisting "*in sustaining the regeneration of Morecambe town centre*". The EIR makes it clear that regeneration in Morecambe is focussed on its role as a visitor resort; for example, section 2.4 discusses the Morecambe resort action plan and states in this context that "*The completion of the Heysham to M6 Link is identified as being crucial to the regeneration of Morecambe*"; and para 6.5 states that "*the scheme is also key to facilitating the regeneration of Morecambe and attracting visitors back to the resort*". The most direct expression of this theme is in the LCC Statement of Case:

"The Urban Splash vision of transforming Morecambe into the Brighton of the north can only be accelerated by the provision of direct access to the resort via the M6 link. It is the lack of this access for example which plays a significant role in dissuading major hotel operators from expressing an interest in operating the restored Midland Grand Hotel." (Para 2.2)

- Increased employment on the Morecambe/ Heysham peninsula, and increased accessibility to employment sites both on and off the peninsula, brought about by the HM6L, leading to enhanced employment opportunities and increased levels of economic activity in an area with pockets of severe multiple deprivation. The main output of the EIR is to appraise these effects in depth and to forecast the extent of benefit accruing from the scheme.

- 2.2 A fundamental problem on both counts is the underlying assumption that a new road will bring benefits, with a corollary that such benefits would not otherwise be achieved. This assumption is explicit in the quote above from Lancaster CC. It also permeates the EIR: the tone is set by the opening sentence, which under the heading "Purpose of the EIR" states not that the purpose is to appraise local economic impacts, but that:

"This Economic Impact Report (EIR) is to support Lancashire County Council's Major Scheme Business Case for the completion of the Heysham to M6 Link," (EIR 1.1)

By Para 1.4 the assumption of benefit is made explicitly:

"the scheme provides particular benefits in terms of improving direct access to Morecambe and Heysham from the M6." (EIR 1.4, 3rd para)

Another example early in the report, in discussion of areas of high multiple deprivation:

"It should be noted that these deprived areas are geographically very well placed to benefit from the Heysham – M6 link." (EIR 3.8)

- 2.3 The problem with this assumption lies in perhaps the most widely known conclusion from the SACTRA report "Transport and the Economy", that there is no simple unambiguous link between transport provision and local regeneration. Benefits could occur at either, both, or neither end of the road or points in between (the two way road effect) and all cases have to be examined individually to see where if anywhere benefits may accrue. The EIR does refer to this issue, as part of risk assessment (EIR 6.6), but surely this is back to front. It should start from the point that improved accessibility can work either way and seek to establish how it will work in practice in the particular circumstances of Lancaster district. Instead, it builds up a rosy picture of positive benefits due to improved accessibility, then assesses the risk of unintended consequences.
- 2.4 In relation to tourism development, the assertion that the HM6L is essential to the regeneration of Morecambe as a visitor destination is suspect. The notion that an at most 10 minute journey time improvement for car users - less outside peak hours when most visitors would travel - on the last leg of the journey to Morecambe, would make or break a decision to visit Morecambe is highly questionable. It is also not borne out by evidence from elsewhere, which points to the quality of visitor experience as the overriding determinant of visitor choice. This issue will be explored in section 3 below.
- 2.5 The EIR presents an analysis of socio-economic context, business perceptions, local travel patterns, availability of sites for economic activity, and changes in accessibility for car users (though, significantly, not for other transport modes). It concludes that on the peninsula 1,822 new jobs can robustly be forecast to be enabled by the HM6L, based on development of existing sites at average levels of job per m²; and that tens of thousands more people would be able to access jobs within the RA, while conversely similar numbers of residents would be able to access jobs further afield.

2.6 There are three overarching areas of difficulty with the EIR:

- **Business context:** The EIR seeks to present a picture of Lancaster district as one where development is hampered by inaccessibility on the peninsula and congestion in all areas, and the HM6L will solve these problems. Leaving aside the fact that congestion relief, even if it happens as forecast, is minimal over much of the existing network, and will be eroded over time by future traffic growth (even in the LCC modelling), the EIR actually presents much hard evidence contrary to its case. Most businesses plan to stay at their current location and regard business prospects as good; skill shortages are the overwhelming recruitment problem; links to the M6 are by no means a majority concern; and lack of serviced sites seems to be the main development problem, rather than lack of accessible sites.
- **Employment forecast:** The forecast assumes an all-or-nothing scenario, that the sites discussed will be developed if the HM6L goes ahead, and will not otherwise: this is untenable, not least because many of the sites have already had substantial development without any prospect of a link road
- **Accessibility:** The EIR presents wider accessibility to employment as a “good thing”, but in most respects it is contrary to the underlying principles of sustainable transport and sustainable development. If more people can commute by car from Morecambe to Preston, and vice-versa, because the HM6L speeds up journeys and thereby offers larger numbers of people acceptable commuter travel times over longer distances, this is the antithesis of reducing the need to travel, reducing distances travelled, and promoting more sustainable modes, which are the foundations of sustainable transport as set out in the original PPG 13 as long ago as 1994.

These issues will also be explored further in section 4 of this report.

2.7 In their justification for the road, Lancashire County Council suggest that local economic regeneration is one of the key "planks" in the case of special circumstances that outweigh the harm o Green Belt, as discussed further in my Landscape and Green Belt proof of evidence. If the local economic benefits case is weakened - as it already has been by the massive reduction in forecast job creation - then the case for allowing harm to the green Belt is correspondingly weakened.

3.0 HM6L AND TOURISM REGENERATION IN MORECAMBE

3.1 Lancaster City Council clearly believes that the HM6L is essential to the regeneration of Morecambe as a tourist resort. LCC appears to endorse this view, although it is more explicit as a Local Plan issue than a County or regional strategic policy.

3.2 The most unequivocal expression of the concept is by the Morecambe Chamber of Commerce, reported in the EIR as part of the stakeholder consultation:

“Morecambe Chamber of Commerce (MCC) stated that tourism is the only realistic and available mechanism for increasing economic prosperity in Morecambe’s economy due to the historic significance of tourism in the area and the lack of appropriate available land in Morecambe for any new developments that would create large numbers of new jobs. MCC believe the two key factors to ensure tourism can be a successful driver for accelerated economic growth in Morecambe, are promotion of Morecambe as a tourist destination by the local authority and other local agencies, and better access to Morecambe for visitors. ... The Chamber feels that the extent of traffic problems in Lancaster is a major factor in visitors failing to return to the area ... the proposed completion of the M6-Heysham Link is a clear solution to many of Morecambe’s economic problems and those in Lancaster district as a whole.” (EIR 4.2)

- 3.3 There is a long history of congested travel to tourist destinations, and an equally long history of apparent indifference of tourists to such travel problems. South West England had notorious traffic bottlenecks in the 1960s, such as the Exeter bypass, but its attraction as a tourist destination was undiminished. In the assessment of the A30 Bodmin-Indian Queens upgrade, both the Atlantic Consultants report and the EIR prior to the public inquiry considered the possible deterrent effect of congestion on this single lane stretch of trunk road between two dual carriageways, most of which was caused by and occurred during peak tourist traffic periods. Both concluded that the deterrent effect of congestion was negligible.
- 3.4 The Atlantic Consultants report found that *“there is no hard evidence that visitors are deterred from visiting Cornwall as a result of these (A30) delays”* (report para 9.3). The report further notes that in Cornwall there are very high levels of occupancy during the peak season months, so there was *“no evidence that any deterrence is actually resulting in overall loss of business”* (report para 9.4).
- 3.5 The A30 EIR supported these conclusions. It found that *“peak season congestion at Goss Moor (A30 Bodmin-Indian Queens) is not having an overall adverse effect on visitor perceptions”* (A30 EIR Executive Summary Para 15), and congestion at key points at peak times is accepted as part of the trip (A30 EIR para 5.2.13). It also reported that *“In the 5 years 1996-2001 there was a 20% increase in numbers of tourist visitors”* (A30 EIR 4.6.5), at a time when there had been no improvements to the A30 and none were in immediate prospect.
- 3.6 The evidence from Cornwall indicates that if the attractiveness of the tourist destination remains strong, any problems getting there do not figure largely in decisions to visit (an unpublished MSc thesis found that a surprisingly high proportion of repeat visitors to Cornwall did not even make any attempt to avoid known congestion hot-spots by changing route or time of travel). The same could be said of modern package tourism: the frequently reported hellish conditions and significant delays at airports seem to have little deterrent effect provided that the destination remains attractive. The problem with Morecambe is that its attractiveness as a traditional resort declined and it is struggling to find a new image, but this is no reason to treat the quality of access over a relatively short stretch of road as a scapegoat, or its resolution as a panacea.

- 3.7 The experience of San Francisco in this respect is instructive, and relevant to Morecambe (earthquakes apart!) as it involved a tourist area in severe decline (Fisherman's Wharf). The 1989 earthquake damaged the Embarcadero Freeway into Fisherman's Wharf, and the business community demanded quick repairs, believing that the loss of easy access would be the killer blow to an already struggling tourism industry. Other factions in the city wanted to reclaim the section of foreshore occupied by the freeway and redevelop it as a boulevard with mixed land use, good public transport, and easy access to the shore, but this was strongly resisted by the traders. In the midst of the debate, a colony of sea-lions established itself at Pier 39 on Fisherman's Wharf, and tens of thousands of visitors descended on the area in spite of the freeway being out of use. This gave rise to the "Sea-lion paradox", that if people could get to Fisherman's Wharf to see the sea-lions why were they not getting there otherwise.
- 3.8 The essence of the sea-lion paradox is that, as in the Cornwall example above, if there is something worth going to people will find a way of going to it. With the help of the sea-lions, the decision was made to demolish the freeway and redevelop its footprint, and the reported regeneration benefits have been significant:
- New development encouraged
 - Attractive urban places created
 - Property values increased
 - Significant increases in visitor numbers
 - Renewal of iconic historic buildings
- 3.9 The situation compared with Morecambe and the HM6L is not entirely analogous, but the message is clear that even for a declining tourist area improved road infrastructure is not a prerequisite to regeneration and renewal. Morecambe has many assets on which to base its revival, and should not rely on a new road as a substitute for imaginative best use of these assets.
- 3.10 The hypothesis that the regeneration of Morecambe as a visitor resort will be significantly influenced by a road scheme that reduces journey times between M6 J34 and Morecambe by about 10 minutes, is implausible. The proportionate effect would be greatest for local trips, but most of these are not to or from J34 and the reasons for travelling will be largely independent of travel time. For visitors from further afield, the proportional time saving decreases, and is progressively less likely to be a material consideration in trip planning as distance increases.
- 3.11 Morecambe should be entirely capable of re-inventing itself and prospering without the need for an expensive and environmentally damaging road scheme. If it is unable to do so, it is unlikely that the road scheme would help it anyway.

4.0 ECONOMIC IMPACT REPORT

4.1 This section looks at the three core issues identified in 2.6 above. There are some other areas of detail (for example, the optimistic implication in EIR 2.2 that the HM6L will help divert goods bound for the north-west away from southern ports by making the Port of Heysham more accessible!): but most of the areas of contention are covered below.

Business context

4.2 Section 4 of the EIR presents and discusses the business survey undertaken as part of the study. It claims at the outset (EIR 4.1) that the 40% return rate “*demonstrates the importance businesses attach to the completion of the Heysham to M6 Link*”, which not only stretches a point but rather prejudges the outcome. The fact that around half the responses came from businesses in areas only marginally affected by the HM6L, such as Lancaster city centre, further undermines this claim.

4.3 The EIR warns (EIR 4.1, survey methodology) that there is a possibility of bias in the survey, because businesses were told that it was being undertaken as part of the scheme submission. There is another, probably more serious area of potential bias in such surveys, in that businesses are asked if they would like something of apparent benefit to them without having to pay for it or commit any other resources. Unless the businesses are familiar with SACTRA and the two-way road, they are very likely to support the scheme on the basis that it could do good, certainly cannot do any harm, and will not cost them anything. This is a poor basis for decisions about major and costly infrastructure investment.

4.4 The EIR builds up a series of statistics and insights into the local business climate, leading to an overall conclusion that there is support for and an identified need for completion of the HM6L. However, much of the hard evidence points in the opposite direction:

- 85% of businesses have been at their current location for over 10 years, and 57% for over 20 years, which does not suggest huge dissatisfaction with the location (EIR Table 4.8)
- 85% of responses to the question whether businesses intend to stay at their current location indicated no intention of moving (EIR Table 4.22)
- 75% of businesses have sites elsewhere, which suggests a degree of inter-site travel, but the permanence of businesses at their current location implies that any difficulties travelling between sites is insufficient to motivate a relocation
- 88.5% of staff live within Lancaster district, which indicates relatively short journey distances in line with sustainable transport good practice
- 49% of businesses regard prospects as ‘good’ (EIR Table 4.9), with higher still percentages in White Lund (60%), Morecambe (56%), and Heysham (55%) (EIR Table 4.10): this in spite of supposed locational disadvantages
- Only 6% of businesses regard prospects as ‘poor’ (EIR Table 4.9), of which the greatest concentration were in Lancaster city centre, and the main concern was uncertainty over the future of town centre retailing rather than accessibility problems

- By far the greatest problem in recruiting staff was skill shortages, where 48% of businesses report “many problems” compared with only 15% for access difficulties (EIR Table 4.17)
- 4.5 When asked what would improve the location, barely 1/3 of businesses (36.6%) cited “better links to the M6” (EIR Table 4.21). This is emphasised by the EIR as significantly higher than any other category, but the assertion is misleading as an almost equal number (35.8%) cited various aspects of improved access which were broken down in the questionnaire into 4 categories - better access, better traffic management, better public transport and reduced congestion, none of which presupposes a HM6L. In any case, the degree of support for the HM6L, in a questionnaire, which as discussed above was expressly about the HM6L, is scarcely spectacular.
- 4.6 A similar distortion occurs in Table 4.23 on the “Nature of Transport Problems”. Road congestion appears to account for a significantly higher number of responses than any other issue, but in fact the highest response is ‘problems with public transport’: this is not immediately apparent because the public transport problems are split into three categories. There is a further technical problem with the questionnaire, in that it asks “What, if any, problems” there are, but there is no box for “no problems”, so ‘absence of problems’ is not reported. In any case, congestion again only accounts for just over 1/3 of responses for journey to work (37.2%) and visitor trips (35.5%), albeit somewhat higher (44.5%) for work trips. This suggests a degree of frustration with congestion, rather than a widespread raging dissatisfaction.
- 4.7 Table 4.27 appears to support a view that there are problems moving goods in and out of sites, and that these relate to links to the M6, congestion, and poor road conditions. However, this is not the case: the report sheds no light at all on the extent to which problems exist (as above, the questionnaire asks “what, if any, problems” but does not provide for an answer on whether there are significant/ minor/ no problems). All the table shows is the relative weighting of several problems against each other; it is hardly surprising that they all relate to roads (not least because the specified categories of answer were about roads) so the answers are not very illuminating.
- 4.8 The summary to EIR section 4.1 (following Table 4.25) contains a number of statements, which bear at best a tenuous relationship to the findings of the survey:
- *“Recruitment of staff has emerged as a significant issue (and) poor accessibility is an issue with respect to this”*: what is not mentioned is that skill shortages are the overwhelming problem, and accessibility is a relatively minor issue.
 - *“In terms of location, businesses clearly see the geographical proximity to the motorway as being an advantage,”*: it is not clear where this emerges in the survey.
 - *“but congestion on links to the motorway is a major disadvantage of the Regeneration Area”*: this statement is implied in only just over 1/3 of responses to a question which asked only about transport problems.

- *“The vast majority of businesses are looking to stay at their current location, or move elsewhere within Lancaster District”*: it would be rather more representative of the findings to say that the vast majority of businesses (85%) intend to stay at their current location. Only 15% intend to relocate, of which 2/3 are moving within Lancaster District: this is the only group for which a move due to locational problems might be inferred, and it is not clear from the survey where they are currently located.
- *“An issue which emerged from the face to face interviews is the shortage of accessible business and industrial land”*: this does not emerge in the survey findings, and elsewhere the EIR presents hard evidence of the lack of good quality serviced sites, but only opinions about accessibility. This is discussed further below.

Employment forecasts

- 4.9 Section 6 of the EIR works up a “conservative” estimate of a minimum number of jobs that can robustly forecast to be created following construction of the HM6L. The approach is fairly simple: it considers 6 employment sites on the peninsula which already exist or are designated, estimates a proportion of vacant land which would be developed following opening of the road, and applies average rates of m² gross floor area per job for sites of these types. In effect it says no more than that if a given area of these sites is developed, a given number of jobs will be created. The EIR does not claim any other job creation elsewhere, as it would be more difficult to forecast, though it is thought likely that there would be some additional employment generation attributable to the HM6L, for example in the revived tourism industry in Morecambe.
- 4.10 Section 6 begins prophetically with the statement that *“There is a high risk of overestimating the impacts in generating employment forecasts for a transport scheme.”*, which is exactly what happened with the original EIR’s forecast of 6,014 new jobs! Having ironed out this problem, the revised EIR comes up with a forecast of 1,822 jobs from a take up of just under 36.5 ha on the six sites. Whilst this figure may be a more reasonable estimate of jobs created by developing 36.5 ha of land, the question remains whether it is reasonable to attribute 36.5 ha of development to the scheme alone.
- 4.11 There are two main issues here, firstly over the amount of available land at the sites, and secondly over the assignment of its development exclusively to the HM6L:

4.12 Available land

There are some discrepancies between the EIR and the Lancaster Local Plan over the amount of available land on the six sites, even though both estimates appear to date from the same year (2004). Most significantly, the EIR puts the amount of vacant land at White Lund at 17.5 ha (Table 6.1), whereas the Local Plan states 3.9 ha (under Policy EC5). There are other discrepancies, some in the EIR’s favour, but overall the total area of available land is just under 8 ha less in the Local Plan than in the EIR.

It is unclear whether there is any spare land at Royd Mill, which stood at zero both in 1998 in the EIR and in 2004 in the Local Plan.

A second issue is whether any of the land has been developed since 2004, since this could not be attributed to the HM6L.

4.13 **Assignment to HM6L**

The underlying assumption of the EIR is that all the land specified at the six sites will be developed if the HM6L is built, but none will be developed if HM6L is not built. This assumption is justified in the EIR by claiming that the sites west of the river are “*currently not considered viable in terms of accessibility*” (EIR 6.2 first Para). This argument does not withstand scrutiny:

- Four of the sites are already partially developed, and White Lund in particular, which accounts for almost half the available land on which the EIR forecast is based, has been developed over many years without any firm prospect of a motorway link road
- Vacant land at three of the existing sites decreased between 1998 and 2004, suggesting that they may have been subject to development as recently as this (EIR Table 3.19: alternative explanation is that land was withdrawn from allocation)
- The EIR itself states that there is strong developer interest in White Lund and Mellishaw Lane North (EIR 6.2), justifying a forecast take-up of 90% of the area
- Only the Lancaster West site (former ICI site) is largely unused and not attracting interest, and this appears to be as much to do with lack of servicing and poor environmental quality.
- The argument has not been tested against any other transport options.

The ‘all-or-nothing’ assumption can be only really plausible for a site that is physically remote from an existing road and needs a road building to it to open it up. This is not the case with the HM6L. At the very least, a reasoned allowance should be made for some land being developed with or without the HM6L, and ideally a range of development scenarios should be tested, including a range of transport interventions.

4.14 There is ambiguity in the EIR whether the main development problem on the peninsula is the lack of serviced sites or the lack of accessible sites. Section 3.9 of the EIR presents ‘hard’ evidence, that “*many of the sites are either unserviced, suffer from poor environmental quality and limited access to the public transport network.*”, followed by a much ‘softer’ assertion that “*a common problem for all sites is poor access to the M6*”.

4.15 This begs the question of what is meant by “poor access”: the Port of Heysham is at worst just over 20 minutes away from J34 at peak times in the 2010 do-minimum scenario (EIR Tables 5.1 and 5.2), and at most times of day the journey will be under 20 minutes. Journey times from White Lund, Lancaster District’s largest employment site, are 3-4 minutes less than from the Port.

Currie's European Transport main depot at Dumfries is 40 minutes away from the A74/ M6 at Gretna, along a modern single carriageway trunk road, and would undoubtedly be described as well placed for the strategic road network. At junction 34 of the M6, the Port of Heysham is a slow 20 minutes away, or Stranraer/ Cairnryan is a fast 3 to 4 hours away: the route preference for traffic to Ireland will come down to the economics of the sea crossing, not to how 'easy' it is to drive to Heysham.

- 4.16 In other words, the evaluation of sites on the peninsula as being 'inaccessible' to the motorway perhaps has more to do with the perception of the route than the hard economic reality of how long it takes. The expansion of the Port of Heysham in recent years, and the permanence of most businesses at their current location, suggest that whatever the frustrations of slow journeys to the M6 they are not the overriding factors determining business decisions in the area.

Accessibility

- 4.17 The accessibility 'benefits' of the HM6L for journeys to employment sites both within and outwith the area, are presented in section 5 of the EIR in a very upbeat manner. In essence, a form of gravity modelling can predict the total population likely to regard a given site as within commuting distance of their home, and since the new road gives faster journey times the isochrones for 10/20/30/40 minutes travel time are extended, therefore the accessible population increases. This works both ways. For sites within the RA, there is a larger pool of potential employees to support the location. Conversely, residents within the RA have increased access to a wider range of employment opportunities through increased mobility.
- 4.18 This is among the most problematic parts of the EIR, because as discussed above this increased accessibility is contrary to the fundamental principles and objectives of sustainable transport. The objective for any sustainable transport strategy for Lancaster district should be to minimise the need to travel long distances by car, by ensuring that the purposes for which travel is undertaken are available as locally as possible and accessible by more sustainable modes of walking, cycling, and public transport.
- 4.19 The HM6L works against this objective, by increasing mobility for those best able to exercise mobility - in principle, affluent car owners. It does not offer this benefit to non-car owners, or even to most low-income car owners who can least afford to travel long distances by car. This equitability issue is an important though often neglected aspect of sustainability. Potentially worse still, promoting mobility by car for some people who might otherwise be encouraged to use public transport undermines the viability of public transport for those who depend on it. As is currently being painfully discovered in cuts in bus services across much of Britain including Lancaster, it is not sustainable, in the literal financial sense, for buses to act solely as the safety net for a disadvantaged minority in an otherwise car-oriented society.

- 4.20 As well as this fundamental objection to the accessibility analysis, there are a few other issues:
- Even accepting the LCC forecasts, the EIR analysis is based entirely on the 'best case' 2010 figures, before travel time benefits are eroded by future traffic growth, which by 2025 has brought many roads on the existing network back to do-minimum (this could happen earlier if induced traffic follows general observed patterns rather than modelled outcomes).
 - The accessibility analysis does not include public transport, which is a limiting omission leading to potential inaccuracies. In particular, there is already rapid access between Lancaster and Preston by train, and in principle better rail access between Morecambe and Preston is possible. Not only might the accessibility benefits of the HM6L be overstated by only considering mobility by car, the potential for travel by a more sustainable mode is being discounted.
 - Some of the stated origins and destinations beg the question of where exactly is meant. In particular, Lancaster's actual city centre experiences very little congestion relief in the modelling, and it is difficult to see how any car trips to, from, or through the centre will gain any time saving - gains elsewhere on the network will probably simply deliver cars more quickly to the end of a longer queue at the centre.
- 4.21 The EIR section on cost savings for movement of goods (EIR 5.9) is especially weak. It examines only three businesses, appears to assume that all trips take place in the am or pm peak, and whilst the percentage savings for that part of the trip appear significant, there is - as acknowledged by the EIR - no attempt to derive a figure for percentage savings on total transport costs, let alone total business costs. This is not particularly difficult to do, using cost information provided by the EIR. For example, assuming the modelled travel times are accurate, there would be about a 6% travel cost saving on a peak hour trip from Manchester with the HM6L in place. If travel costs are say 7% of total business costs (the median point in the range of typical costs reported in SACTRA 1999 section 2.23), the percentage saving on total costs for this trip would be 0.4%. A similar saving could probably be achieved in the do-minimum scenario by planning deliveries outside peak hours. Clearly, as the EIR says, the longer the trip the more negligible these savings become.
- 4.22 In summary, the EIR has shortcomings in its case for local economic benefits arising from the HM6L. It does not demonstrate that the current 'problems' accessing the M6 are as important as it makes out, or that accessibility is the limiting factor to development of employment sites on the peninsula and thereby increasing levels of local employment. In any case, the scenario it presents, in which benefits flow from increased mobility for users of fast roads, is at odds with the fundamental tenets of sustainable transport.

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