

# 10th June Tues

10 June 2014

10:01

## Continued cross-examination of Mr Flesher

MW	-errata, CA designation statements, Leeds City Council list of docs for LBCs
RW	Mr Ward will provide errata today.
NC QC	3 Notes to put in - APP-14, 125 and 126. The first is headed "trolleybus site stopping distances" - carried out the calculation in acc with Manual for Streets . APP-125 is a response by Mr Chadwick to a calculation by Mr Alexander based on a table in C-1-11 (which it's said is mis-labelled). APP-126- you'll recall there was a supplementary rebuttal from Mr Cheek and this is a response to that from Mr Hanson.
MW	I'd like to ask some Qs to Mr Flesher first to clarify certain things in his evidence.
	Can you summarise what your input into NGT has been?
SF	Yes I'm the witness on the public parks and green spaces that are used for recreation.
MW	That's it, is it?
SF	Yes
MW	Have you been involved in developing the proposal?
SF	Not personally, no. Some officers from the parks service were consulted on the mitigation works but not me personally.
MW	So have been consulted?
SF	That's true yes.
MW	APP-11-2 para 2.13. You say assessment on plans -what plans?
SF	APP-10-3 landscape plans.
MW	In Table 2.2 on page 10 you have a list of parks and recreation spaces- have you got plans with defined boundaries of these places before and after because for me it's not obvious what areas they cover.
SF	There are some Mott Macdonald plans
MW	Do they identify which green spaces you refer to? Would be useful . And "Before" and "after" the NGT - any changes to the area - whether those are available. Wouldn't that be useful, to ID them on a plan?
SF	I think it's possible to do from the information that's already available.
RW	Document B7 -should we use this as the baseline plan and label the spaces?
MW	From this scale it's not obvious -would be useful if they could be transferred, just in boundary form, onto a detailed plan to identify what bits of land are encroached on and near to the NGT route.
RW	We'll do that and cross-refer to other documents. And also the landscape drawings show the NGT crossing the land.
MW	Do you know which plans and what stage of landscaping plans were used?
SF	I conducted the survey in January - so if they haven't substantially changed since then...?
MW	Do you know what stage the landscape proposals are at - in draft or final?
SF	I don't really know to be honest.
MW	Do you know how many changes could be taken on when it comes to the detailed design.
SF	To qualify, I undertook a survey on the plans as they were in January.
MW	On these plans there's a lot of points that say "opportunity" - say, Belle Isle Circle. Do you know what that means?
SF	I read it as meaning officers from parks and landscape service will have some influence. And usually we would consult local people.
MW	In terms of this opportunity do you know if there's funding set aside for it?
SF	I don't have details of funding. I take it as read that the mitigation will be carried out. It should be
MW	You say should be, not aware of any specific budgets for parks and recreation?
SF	No. Not been costed.
MW	Now - Woodhouse Moor 122 and 123. Top LH corner says "playground to be relocated. What's that?
SF	There's a skeleton of a former playground without equipment. We're looking to replace a redundant facility with informal play space.
MW	Do you have a location?
SF	Will be moved to the right. The NGT scheme goes through the playground.

MW	That looks more like a traffic
RW	Technical drawing TD22 inset A shows the location
MW	Woodhouse Moor is covered in your Appendices and you say an improvement. Why?
SF	Is improved as a result of the mitigation works. The land take is a relatively small percentage of the overall area of Woodhouse Moor. The current areas are known as "Little Moor" (where playground is) and "Monument Moor" and "Cinder Moor" (where it says "playground) to be relocated")...An assessment of the whole park which is over 5 hectares. 4 parcels.
MW	You've assessed it over the whole area?
SF	Yes. The area to the south is traditional Victorian ornamental. The other areas (little, cinder and monument) are not used for passive recreation but are of relatively poor quality and pull down the other areas.
MW	Would you have allowed for all of it being lost from the Park?
SF	Where landloss yes. Where loss to place electricity poles but relatively minimal effect when finished, that's reflected in the score.
MW	What about fencing and kite flying?
SF	To be fair that would be a genuine effect if the wires were located over a football pitch or a kite flying area. That would be taken into account in the scoring.
MW	You've taken that into account have you?
SF	Yes.
MW	Has the access criteria been affected positively or negatively?
SF	Can't directly access Cinder Moor or Little Moor. However mitigated against by improved access from retained and refurbished steps to Monument Moor and also new crossing points.
MW	Don't seem to be many crossing points. One at Ragland Road where the stop is and then have to go right up to Rampart Road to access it the other end.
SF	You have to bear in mind that it's about the whole site. Overall net effect is neutral, say where we refurbish the existing steps that are of poor quality.
MW	What about access for the disabled?
SF	Depends which parts. The access is good but not excellent. Some parts e.g. Monument Moor which is on different levels cannot be accessed with a wheelchair. That is the situation now and will be after the scheme.
MW	Is there any reason why you wouldn't change it?
SF	It's difficult because of the levels but constrained by the mitigation allowed for.
MW	You don't know what the funding is?
SF	Only what they have allocated as mitigation on the plans. If they had provided disabled access that would have been positive.
MW	Moving to Belle Isle Circus Plan 141 - that green dashed line is a hedge?
SF	Yes
MW	So a barrier taken out of the park area/segregated?
SF	Yes but it is possible to cross...
MW	No, a hedge and the NGT
SF	Yes.
MW	You wouldn't be able to cross over but you'd still call it part of the park?
SF	Yes. My score does reflect a negative effect - goes from "good" to "fair" because it is effectively a partition,
MW	You said access would be improved. How?
SF	4 more crossing points to the North. Hatched areas. Which is probably safer than crossing the general road now as a traffic island.
MW	Adjacent to where the NGT is running- you've called that improved access?
SF	Yes and the extra paths across it which will improve access for wheelchairs or pushchairs.
MW	The path has been rerouted to avoid and run along the NGT. Is that an improvement? Less direct?
SF	Yes- in terms of the quality of the path. And instead of a "desire line" we have a triangular "circulation route" to use as a circuit for pushchairs etc.
MW	And you say some benches?
SF	Yes some performance spaces, some areas for relaxation and contemplation and seating. At the moment, site open-plan.
MW	A circular area in the middle there already?

SF	The path's not there.
MW	There are paths across it as I've seen it.
SF	No circular network - run directly across and segment the park rather than providing a circulatory route.
MW	You think they would e better than they are now?
SF	Yes. And the recreational use now for kicking a ball about is mainly to the south of the NGT proposal because open grassland - the northern part has vegetation and is used more for dog walking.
MW	But you have a hedge and wires next to that. Won't it hamper their sport?
SF	It's not a formal football pitch - we're talking jumpers for goalposts. I imagine they would play further away. At the moment the ball could go into the road so it's a balance really. But in fairness it <i>is</i> affected because it does parcel off the land. But overall improvement of the score - new improved seating areas, more paths, more diverse planting and age and species of trees. Would improve the score though not by much.
MW	Mr McKinnon. How long do you need?
MK	An hour and a half or so.
MW	I'd be surprised.
MK	You say you can't currently access Monument Moor from a wheelchair but that's not correct is it? Can currently do so fro Rampart Road.
SF	Not when he NGT is in place.
MK	But you can currently.
SF	It's rough tarmac that we wouldn't qualify as suitable for wheelchair access if we were layig out a path today.
MK	That's not going to be there is it bcause of the NGT.
SF	Correct.
MK	You say Monument Moor and Cinder Moor "pull down" the park. You mean pull down the whole park score?
SF	Yes.
MK	If they're pulling the current score down now, if they didn't exist or you sold them off that would improve the score wouldn't it?
MW	Relevance of this?
MK	That's not a useful means of scoring. If it was a valuable scoring method then that would indicate the park would be better off.
SF	If I was assessing a proposal which resulted in loss of the site that would bereflected inthe score. We would lose a valuable event space - circuses and event parking.
MK	So they aren't currently puling down the score?
SF	Not from a space perspective but from a quality perspective. No signage, no interpretation. Green spaces are rough grassland. A disused playground now. Will have flowers and additional tree planting and change hard surfaces to grass surfaces to allow passive recreation. Also will have regulated parking areas on Monument Moor that will look green but be cell planting with an event function. So there are some positive aspects to the mitigation.
MK	The playground was operational and children were playing on it in 2009 when this scheme was proposed. You closed it down?
SF	If you're inferring that it was closed because of NGT that's not true. Did an engineering assessment it was old and it was decommissioned because it was unsafe for children.
MK	You say it's positive because it would qualify as a "Leeds Quality Park" but doesn't now?
SF	Yes well it will increase the LQP score.
MK	You state it will not have an adverse effect on any green space. You've looked at "before" and "after including mitigation".
SF	Yes you have to show, look at what's taken away and what's added back. I'm not aware that we would get the NGT with no mitigation - that's not what the user would experience.
MK	You say it's anticipated that it would not require current activities to be discontinued and "Furthermore" would enable it to improve the score. So you say no negative impact.
SF	Yes what I'm saying is when you do LQP assessment you go from a park that doesn't meet the standard to one that does.
MK	That sentence implies that the NGT <i>without</i> mitigation is an improvement.
SF	I don't read it like that and I didn't intend it to read like that.
MK	D-6-14, Green Space Strategy, page 20. It says community parks are mostly visited by local people. That's why they are called "community" parks?

SF	Yes people who reside in the local area.
MK	You agree that community parks are visited more often than city parks?
SF	Yes cumulatively.
MK	It currently doesn't meet the Green Flag standard?
SF	That's right.
MK	The Strategy shows average spend £1,874 compared to mean for other cities o £6,500. Leeds City Council gives you a quarter to spend on community parks per hectare.
SF	That's right.
MK	Do you agree therefore hat compared to other cities Leeds undervalues its parks.
SF	I agree that in 2009 when the strategy was written it spent
MK	Woodhouse Moor, this is the most intensively used park in the City? Appendix 18 to Friends of Woodhouse Moor evidence. Does it seem equitable that the City spends more on the City Parks when the community parks receive more visitors?
SF	We spend more on City Parks per park but probably not overall.
MW	What's the relevance to the effect of the NGT. I don't want to explore the whole Leeds strategy to parks.
MK	One of the oldest and most intensively used parks and you are happy to drive a trolleybus through it.
MW	You can put things in your statement and not have to ask every thing. It's using up a lot of time
MK	I'll just ask 2 more questions. It's the case isn't it that community parks like Woodhouse Moor are mostly visited by people on foot whereas city parks are used by people using private parks?
SF	Probably.
MK	What's the budget for Woodhose Moor?
SF	We don't have separate budgets for separate parks .
MK	So we won't be able to tell whether Woodhouse Moor is getting its fair share?
SF	Not without doing a whol epiece of work.
MK	On the scoring LQP assessment. First criteria is a "welcoming park". It states that styles present a barrier to ld people. The trolley bus track would present a barrier wouldn't it, to anyone?
SF	Yes that's the intention where it's fenced
MK	A barrier's not welcoming is it?
SF	Depends what it looks like and landscping.
MK	Do you consider acoustic protection important?
SF	It's a benefit of additional tree planting. A tree canopy deadens noise, keeps it cooler, shade, all sorts of benefits.
MK	Did you take into account that the buses will have bells ringing when they cross the Moor?
SF	No.
MK	Are you aware that the track is fenced off because the vehicles are deemed to be less safe tan buses?
SF	I don't know.
MK	Are you aware that the proposal involves stacking traffic
SF	I'm not aware of it in any detail.
MK	Would not be helpful to users of the park to have stacked traffic on the dual carriageway.
SF	Will depend on the current traffic.
MK	Flows freely at the moment?
SF	On most occasions when I've been there, yes.
MK	Para 4.662 of Landscape Technical Appendix says "majority [of monument mor] will be resurfaced with reinforced grass". How is it environmentally sustainable to cover it with plastic mesh?
SF	A hard surface, permeable and looks green and is softer on the eye/more appealing than concrete or tarmac.
MK	Para 4.664 of the landscape assessment says it will have "moderate adverse effects" so from a landscape view it's negative isn't it?
SF	I'm not sure in what context that is referring o. It will take about 6 months to establish a green sward across it.
MK	Another criterion is heritage. Are you aware that the park is part of a conservation area?
SF	I'm not aware of the details no

MK	Buses wil travel within a ard or 2 of Marsden's statue?
SF	Yes
MK	Statue may need to be moved?
SF	I'm not sure.
MK	Wil take away some features used in 1951 Exhibition.
SF	Not aware of what was there but it does take some existing landscape features away
MK	Are you aware that Rampart Road has had Roman remains found under it?
Sf	No.
MK	It doesn't preserve the heritage?
SF	I've acknowledged that there's a negative effect at page 38 of my appendix but the landscape plan doesn't show the statue being moved.
MW	The proposals are to keep it That's what's going to the SoS.
MK	The negative comments are not reflected n your scoring for heritage are they?
SF	No it doesn't. Doesn't physically affect the statue itself. Will be landscaping effect that is acknowledged.
MK	I Jan 2013 the Friends of Woodhouse Moor took a delegation to the Council to urge it to take an alternative route that would leave the Moor intact.
SF	Aware of a delegation not the details.
MK	You weren't consulted on the alternative route?
SF	No.
MK	You weren't aware that alternative was rejected?
SF	No
MK	Went straight to directors of Metro.
MK	You won't be saying "come to Woodhouse Moor there's a trolleybus across it" on your literature?
SF	Well we're always updating our literature.
MK	The Green Flag Standard is an ideal but your scoring goes part of the way.
SF	It's from a user perspective not a technical perspective.
MK	But there's another criterion that's not reflected in the scoring which is "management" and strategy. You do have a managemet strategy for Woodhouse Moor don't you?
SF	It was included as a landscape plan because we wanted to apply for Heritage Lottery funding.
MK	Refers to "open nature" and "few major barriers" - this cuts across that?
SF	Yes there are negative aspects and
MK	The management plan refers to tarmac pay and display parking. Not msh?
SF	Not at that time, no.
MK	The management plan was calling for parking to relieve congestion elsewhere?
MW	Why are you questioning on this rather than on what the effects of the NGT would be?
MK	Because Mr Flesher is using the LQP which is based on Green Flag. This also requires a desk based assessment. This park has a desk-based assessment.
SF	That's not a desk-based assessment but the management plan. The desk-based assessment would assess the management plan.
MK	The Green Flag criteria refer to the management plan as being the final point of the assessment system.
SF	This is not a Green Flag assessment of the park.
MK	You've done that because it's convenient to you...
MW	I can see you've got concerns on contents of other documents but keep it relevant.
MK	If you include the management plan you could complete the equivalent of a Green Park standard assessment?
SF	Yes you could but that's not the approach the Council has adopted.
MK	You could if you so chose make a submission to the national body to get Green Flag designation as you have everything here?
SF	Yes that's the final criterion but it's not a usable, friendly document to make it easy for the judges.
MW	I'm amazed you've so many questions- let's have a break and make sure that the questions are directly related to the proposal and that Mr Flesher can deal with.
RW	We've no criticism if wider questions are not put to Mr Flesher.

MW	We'll adjourn till twenty to twelve.
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RW	Table 4.2 on B-5 p.16. I wondered whether with B7 and the photos there, that was enough or you wanted a blown-up OS map?
MW	Yes just to see where along the NGT route they are, in a user-friendly way.
	Mr McKinnon
MK	The proposal is to build an NGT stop on the Moor and part of the mitigation is to build a large area of reinforced grass?
SF	Yes.
MK	The management plan p.123.
MK	Why did you not reflect harm to conservation of natural features in the scoring?
SF	I looked at it but also added points for mitigation.
MK	Replanting isn't conservation.
SF	One or 2 trees will be lost. In my professional opinion that is outweighed by new planting.
MK	More than 1 or 2 - do you know how many?
SF	I think no more than 10. There's more effect on existing trees on Cliffe Road. It is a good thing to have different ages of trees in the park. A lot are quite mature but when we lose them we will lose them all in one go.
MK	We'll lose trees bordering Cliffe Road and bordering Woodhouse Lane. And bordering Raglan Road because they are in the way of a trolleybus stop.
SF	Er yes I called that Woodhouse Lane.
MK	Did you realise that the proposal to have poles from which gantries will be suspended will require the trees to be substantially cut back so they don't touch the high-voltage cables. Have you taken that into account?
SF	Yes - some will require pruning. But I make an assumption that there will be no overall effect unless on the plan it says the tree may have to come out.
MK	You don't think it's appropriate to knock points off for loss of existing trees?
SF	I've explained that I did, but then added points on for mitigation planting of new trees.
MK	Page 20 of the Green Space Strategy states that access to green space is a particular issue where there's an area of deprivation. Lots of terraced houses with no gardens in Hyde Park.
SF	Yes.
MK	You're reducing the area of green space available?
SF	Yes
MK	You say 8.1% of the space will be affected.
SF	Those figures refer particularly to Little, Cinder and Monument Moor and the strip to south of Woodhouse Lane - that's not the percentage take from the overall park. And though I've noted some is lost from Monument Moor that is more than compensated for by conversion of hard area to amenity grass. Top part is compacted tarmac and ash and will be put back as grassland that can be used for amenity. That more than compensates for the "point of the triangle" that will be lost as part of the NGT. A major benefit from a recreation perspective. The area to the left which is hatched in zigzag will be reinforced grass for parking.
MK	If we pull out [zoom out]... The landscape assessment said the "majority" would be covered in mesh but this plan looks like less- no more than maybe 50%. Also we have to take into account the slope.
MW	Mr Walker may be able to answer that.
MK	About the 0.1%. About a quarter is taken up by allotments? Or a fifth?
SF	Hard to tell.
MK	A good chunk of the moor.
SF	I think probably 15%-20%.
MK	Locked, can't access them if the public?
SF	Yes.
MK	The publicly accessible space taken by the NGT will be more than 0.1% won't it?
MW	Mr McKinnon wants to know if that figure covered the whole park area?
SF	I didn't do the calculation but that's my understanding yes.
MK	People can park now on Monument Moor?
SF	We allow access for organised activities yes.

MK	So how is it "mitigation"?
SF	More amenable to the eye than if it were a hard surface?
MK	It's a green meadow at the moment with no muddy areas?
SF	It's a hard area with weeds on it.
MK	The mesh won't stop weeds growing.
SF	We could run mowers over it.
MK	You can do that now?
SF	No it's an uneven surface and could damage the mowers.
MK	You refer to amenity use but you can trip up on the reinforce mesh - dangerous?
SF	It's for looking at - visual amenity, and also can accommodate fairs and circuses outside the spring and summer season - will still be able to do it.
MK	How often does the circus come?
SF	Once or twice a year. But - and I'll admit I last looked at it a long time ago - it is used for some events for about 180 days of the year. Some is for city centre events.
MK	You allow event parking every week for Leeds university but the events relating to Woodhouse Moor are a tiny percentage?
MW	We're straying off topic.
MK	You say at the moment it's a borderline fail but it would be an advantage as it would get Green Flag status?
SF	I wouldn't call it an advantage - it's an effect.
MK	Does the methodology not mean anything then?
SF	It shows an improvement- the effects of the mitigation.
MK	Yet you say the NGT isn't an advantage?
SF	From a user perspective the quality improves - wild flower planting, tree planting, new amenity space.
RW	I think we've explored this? Whether an advantage or a benefit...
MW	Do you know whether this has been counted as one of the advantages of NGT?
SF	I don't know...
MK	Can you tell me, Mr Flesher, the Leeds Quality Parks score does that have any advantage in itself?
SF	Yes
MK	What practical use is it?
SF	It shows to the general public the quality of the green space where they live.
MK	There's a advantage between the park that just meets the standard or not.
SF	Depends whether a long way off at the moment.
MK	If the mitigation wouldn't take it up to the standard that would matter?
SF	I would report whether it met the target, increased or decreased.
MK	It matters whether the existing score is correct?
SF	Yes.
MK	Appdx 11-3 page 36. Existing score is high for community involvement?
SF	Yes - classed as "very good" for community involvement.
MK	But Highway Department proposal for new lane of traffic in 2008, proposal for pay and display car park.
MW	Was this assessment done separately to the NGT proposal?
SF	Yes
MW	I don't see what we gain by going through in a lot of detail what their independent assessment was.
MK	I am trying to ascertain whether the original assessment done in October 2013 was right.
MK	Would you agree Mr Flesher, the history of community involvement has not been good?
SF	With establishment of a friends group, events we have on, that's "very good" and reflected in the scoring.
MK	On relative poor quality of Cinder and Monument Moor your implication is that NGT is not bad as it's not affecting the rest of the park?
SF	Well I've only assessed what's actually going to happen. There is a difference in quality.
MK	The St Marks Flats development produced £150,000 of s.106 money for improving Woodhouse Moor but officers objected to it.

SF	That's a planning issue and is not part of my jurisdiction.
MW	I'm assuming you're not going to spend the money?
SF	I'm aware how much money is available in the ward. We consult on what we are going to spend the money on.
MW	Have you been told you have money regardless of whether NGT goes ahead?
SF	Yes there would be planning money - not my decision.
MW	But there is money available to spend on Woodhouse Moor.
MK	Not parks officers who objected?
SF	I'm not close to the detail. What happens is parks officers consult with planning and I haven't got the details of those proposals available in front of me.
MK	Aren't you the ultimate decision-maker?
SF	No I'm not consulted on every piece of s.106 money. We spend about £1m a year on green space projects and area managers will approve money.
MK	The s106 agreement says the community would be consulted- when would that happen?
SF	[looks to inspector]
MW	Perhaps Mr Speak could deal with that?
MK	Section 122 LGA 1972 appropriation. You give responses to objectors but one of the main objections is that the Council did not show that the open space was no longer required which is one of the requirements.
SF	I wasn't one of the decision-makers.
MW	More a legal issue. Don't think Mr Flesher can be expected to answer that.
MK	It is said that NGT will plant trees where they lost trees to Dutch Elm disease in the 1980s. But should have been done years ago?
SF	Like the playground, we replace where we can with the resources available.
MK	You've got Japanese knotweed on the Moor- not mentioned in the assessment is it?
SF	Not mentioned. I am aware of it.
MW	It's been taken into account has it?
MK	You can treat Japanese knotweed with..
MW	I don't want to deal with this in a trolleybus inquiry.
MK	Sir I got sucked into it.
MK	The flat area used by football players, that's regularly under water isn't it?
SF	There are wet areas.
MK	That's relatively recent isn't it?
SF	It depends on the use - whether compacted, whether heavy vehicles for a bonfire.
MK	There are springs and a Victorian drainage system- do you not think the heavy equipment...
MW	I'm not going to go into the management of the park.
MK	It's proposed to create pedestrian-dominated shared space where vehicles including trolley bus would travel at low speed and give way to pedestrians. Would you like the trolleybus crossing the Moor to be shared space?
SF	It's not something I've considered.
MK	Can you consider it now.
MW	I think that's it. He says he hasn't considered it.
MK	Have you heard about the Liverpool trolleybus scheme?
SF	I don't know the details of it.
MK	The inspector said there should have been replacement of the parks- was he wrong?
SF	I don't know about the details.
MK	Have you pointed out the economic value of green space to the NGT team?
SF	No.
MK	The Green Spaces Strategy says there is a clear link between green space and land value. Did you make the nGT team aware of that?
SF	No.
MK	Would you have been allowed to say you wouldn't want the trolleybus in the park?

SF	Wasn't something I was asked to consider.
MK	If you had said you didn't want the trolleybus on the park would it have gone over the park?
SF	I don't know- didn't say that.
MK	Would you want an alternative that didn't cross the park?
SF	I don't know- would depend on what it was.
MK	Was there a written record of what you were instructed to look at?
SF	No I think I was asked orally in a meeting.
MW	Where is this going?
MK	I've a few personal questions. Are you aware that the harder artificial surfaces lead to more injuries?
SF	No.
MW	Mr Jones did ask this and Mr Flesher did answer it.
MK	Can get so hot it can cause burns? [Not aware]
	Needs chemical treatment for bacteria [no, not looked at the maintenance regime]
	Affects way a ball bounces [no]
	Scottish premier league has banned it for matches [no]
	Players when polled prefer natural surfaces [no].
MW	Mrs Patterson.
EP	I'm Mrs E Patterson ('EP') speaking on behalf of Middleto Park Labour Party and on Belle Isle Circus. I'd refer you to page 4 [Appendix]: criterion "welcoming place". Can you tell me why the mark has gone from 0 to 7 for "signage" -what are they going to say?
SF	Yes a lot is subjective. It's zero because no signage or interpretation at all. There will e an opp to install signage or nterpretation to say what it's called, what it can do, what we don't want you to do, some notice boards on it.
MW	Isn't that something you can do very cheaply without having a trolleybus going through?
SF	We asses 146 sites - this is not one of the 146 sites -but one of the 600-odd sites we maintain. Would be good to spend £3,000 to £4,000 on signage but would also be good to do that elsewhere.
EP	Won't it have anything to say about the trolleybus because it's a silent bus isn't it?
SF	I'm not the expert witness on that. In consultation with the community we might want to have some interpretation on the trolleybus - unique to Leeds.
EP	[To inspector] - Would you like to see the photographs of Belle Isle Circus?
MW	I have been there but can go again.
EP	Then "sustainability" -will cut down 2 mature trees and replace with 52 saplings so how does that improve the age profile?
SF	The curent ones are maybe 20 years old but are of same age and will all expire together. We have the opportunity to add different species and different ages to establish some interest.
EP	This will take a long time?
SF	Yes takes time to mature.
EP	Lots of residents are elderly and like the trees and won't live to see them mature.
SF	The character isn't going to be significantly affected overall - depth of the planting.
EP	The LQP score. Before trolley bus 45.4, after 48.2. I can't understand how an award could be given when - tarmac road, poles, sign about the trolleybus, traffic lights. Hard to see how.
SF	It's there in the scoring.
MW	Mr Fletcher, the signage makes a very big difference. I would imagine that any detriment due to trolley vehicles are taken by the sign.
SF	Well there are other things improved too.
EP	Are you going to put anything about the trolleybus to stop children running...
SF	I'm not the witness on that.
MW	Not Mr Fletcher's area. But it has been raised.
EP	That's the end of my questioning, Would you like my colour photographs? Already in black and white.
MW	If you want to submit those in colour then.

MW	Mr Nakus [12:50]. Who are you representing today?
SN	Headingley Land Developments - joint venture between [ ] Homes and Catholic Diocese. It concerns the green space near the Headingley Hill NGT stop. APP-118. Can we clarify who owns it. It's not St Columba's Church but Headingley Land Developments. That "desire line" is for blind people in the area and is by formal agreement with us.
SN	Now, there are 2 elements - benefits for planning and also the compulsory purchase and whether it is necessary. This is where land is taken to provide for a public park. Not currently designated open space?
SF	Not that I'm aware. Not aware of what its designation is.
SN	Loss of this site wouldn't have any effect on open space.
Sf	Not that I'm aware of.
SN	Can you take us through what your understanding is of the "pocket park"?
SF	Third of a hectare. Access park through it. Some tree planting, Some wild flower. Some signage and interpretation in. A small public park accessible to people in the area.
SN	Community usage limited to the park?
SF	In terms of management of the habitat yes. Public will have right to access it but we're manage it for wild flowers.
SN	Can't use all of what is shown green -no ball games?
SF	No.
SN	No dog walking
SF	Probably confined to the path
SN	No picnics?
SF	Should be some space for a picnic.
SN	Not a park then - rather a landscaped path?
SF	We have some areas of parks managed as wetlands, some with networks of paths. It varies. How you manage it affects the use.
SN	Football would ruin the flower meadow.
SF	September to spring, depending on the wildflower mix we use, we will cut down the flowers in September and remove all arisings so could be used.
SN	Would it need replanting or would they come back.
SF	If heavily used it would have a detrimental effect.
SN	No restrictions on its use?
SF	No But we would put on the interpretation something saying what to do and not do.
MW	People could run across the wild flowers?
SF	Before they started to grow. It would cause problems once they had grown.
SN	Woodhouse Moor is a huge area that could be used for a variety of things but there is no alternative area here as there is at Woodhouse Moor?
SF	Yes but the pressures around them are different.
SN	Inherent conflict between using for recreation and use as a meadow?
Sf	Depends -if people were to use it for ball games regularly that would have a detrimental effect. If they used it for contemplation then we wouldn't.
MW	Doesn't show a seating area?
SF	Well you could have seats along the line of the path. Also if you space the tree planting out or it's not even you stop ball games on it. It's about taking the opportunity when you lay it out.
SN	Not been done on that plan?
SF	Well it's a flat plan. If I was consulted I would have an undulating area. Also the size is only a third of a hectare and nothing to stop us putting the odd tree in place to break up the open character.
SN	Page 7 of your Appendix is the assessment. Is the "off-plan assessment" the plan on screen at the moment?
Sf	Yes.
SN	Yor score is 51, only just the minimum. Is it not more aspirational to go for a higher figure for a new park?
SF	It would be nice but I've just assessed the plan.
SN	Strengths it says are "exercising of dogs" but limited to the path?
SF	Depends on the time of year and wouldn't necessarily cause a huge amount of harm.

SN	At least for a large part of the year.
	"Healthy, safe and secure". Refers to disposal of dog waste off-site but shouldn't that be provided on-site?
SF	No - in major parks we put receptacles in but for small spaces we encourage people to take their litter home.
SN	For "appropriate provision of facilities" you have scored 7 when there are no facilities at all.
SF	Well the signage will ask people to take waste with them. We're not restricting dog walking so they can do that.
SN	What facilities have you provided on that site?
SF	You ave to be realistic. Not designed for youths or children. It's about facilities provided being it for purpose - gives access to wild flower planting, a path in good order, some furniture - don't need more facilities than that.
SN	If you are giving scores for furniture and so on shouldn't it be shown?
SF	I didn't do the plan.
MW	What's the budget?
SF	I don't have budget but there is a fund for mitigation and I said what I would expect to see.- litter receptacles etc [page 9].
SN	What mechanisms in place to make sure that those are delivered?
SF	There are 2 elements to that - one, the park has to be laid out in accordance with what we would consider appropriate for adoption. As part of mitigation you would have to provide furniture and receptacles. And you would need sufficient funding to manage it?
MW	For how long
SF	For 10 years.
SN	You would say thee needs to be a planning condition to secure that?
SF	I think that's separate to what we would look for when we negotiated whether we would adopt a site as public open space.
SN	Separately on whether it is specifically required for the CPO. Can we turn to ES, technical Appendix J on Open Space. [B-5].
	We heard last week that Headingley as a ward has a deficiency of open space but it's not for NGT to resolve that?
SF	I suspect that's part of the planning process.
SN	Who wrote the ES chapter?
SF	Don't know.
SN	Have you reviewed the ES?
SF	I've read it.
SN	Table 3.1 p.10 -open space by ward. And para 3.11 - doesn'[t interact with UDP designated open space? Says no impact on Headingley by the NGT?
SF	Yes
SN	The pocket park -which ward is it in?
Sf	I think Headngley.
SN	This park isn't specifically needed to mitigate for effects of the NGT in Headingley?
SF	I think that's a matter for the planners.
RW	Mr Flesher gves evidence on the usability of the spaces.
MW	It's a pint you can make but I don't think Mr Fletcher can answer it.
SN	Mr Fletcher's the only witness to be questioned on Technical Appendix J.
RW	Mr Fletcher can give evidence on the usability of the open space. On shortfalls Mr Speak deals with that.
SN	Well can I ask who I put it through. What this chapter does is say the park mitigates for other open spaces. Table 4.2 p.15. There's 7- 9- open spaces here. This is not a designated open space so is not affected for the purpose of the table?
SF	Not as I understand it.
SN	On mitigation. Table 4.3. None of the mitigation listed cites this pocket park.
SF	Not something I've been involved with. I'm not sure about mitigation for loss of green space as it is not my area of expertise.
RW	I'd hoped that the chapter was clear on what was proposed. I don't think it's part of Mr Flesher's evidence whether the park is required to offset impacts to Woodhouse Moor, or anything else. Mr Purseglove gives

	evidence on ecology. It's not part of our evidence that this is to compensate for Belle Isle.
MW	You can take it that this site is not being put forward as mitigation.
SN	That's fine but Table 4.4 we have predicted effects- now includes the new green space in Headingley. It says "medium sensitivity resource" and a "beneficial impact". To get there we have to go to page 6 tables 2.2 to 2.4 for the methodology. It gives examples of Belle Isle Circus. Would you agree it is in the same category as Woodhouse Moor or Belle Isle Circus?
SF	Hard to comment as I'm not familiar with the methodology. More comparable with Belle Isle Circus than Woodhouse Moor.
SN	Belle Isle Circus is 4x bigger. My question if you are able to answer, is which of those categories is the "pocket park"?
SF	It's difficult for me to answer because I'm not familiar with the methodology.
MW	On those descriptions, which one would you say?
SF	I'm not sure any of them. It's a judgmental thing -for me would fall between low and medium.
SN	Can't compare with Belle Isle?
SF	I'm not familiar with the width of the categories in the methodology.
MW	Mr Flesher is not involved with this.
RW	We can't give a witness to answer every question - the objector can make submissions that they have questions that weren't answered.
MW	Yes you can make your own statement and say there is no witness who contradicts them.
SN	I don't want to miss someone's evidence.
RW	I've given some indication who he could put questions to but will not criticise Mr Natkus if he makes submissions.
SN	I don't want to waste inquiry time with Mr Speak if <i>he</i> can't deal with them.
RW	We'll do what we can to help but at twenty-five to two it's clear that Mr Flesher is not the person to ask.
SN	Well you've heard my concerns.
MW	[13:34] We'll adjourn till 2.30.
NC QC	We've 2 new docs to go in - APP127 on age of data from Mr Hanson and APP128 from Mr Chadwick.
DCJ	There was discussion on disabled access to Monument Moor - established there is rough access at Rampart Road end but also at Raglan Road end as well. Isn't there, as it currently standards?
SF	I'm not quite sure?
DCJ	Across the road from the Library/near Clarendon Road.
MW	Is your question whether he wants to reconsider about disabled access at that end?
SF	Though there is a ramp, it's a loose hard surface that's not easy for wheelchairs.
DCJ	Is it not the case that there is level access at the other end?
SF	I think there are existing steps.
DCJ	Not near the Marsden statue but towards the end.
SF	We're not contesting that there is access, but not designed with the disabled in mind - from a LQP perspective whether that would suffice, the answer is no.
DCJ	In para 2.13 of your Proof, you say "in order to ID the impacts that NGT would have I have made an assessment using the LQP standard". In your appendix you say the land at Woodhouse Moor and Belle Isle Circus score a few points below at present but when NGT is completed they will be just above?
SF	Yes
DCJ	Are those the only spaces you've assessed that will have a road though them for NGT?
SF	I'm not sure - I think one near the city centre may have, where the Dry Dock public house is.
DCJ	I need to know whether there is a road going through the open space.
SF	Yes.
DCJ	Is it in the scoresheet
SF	"Land at Woodhouse Lane green space".
DCJ	You say the score before and after NGT will be exactly the same.
SF	Yes.
DCJ	Are you saying that NGT will lead to improvement because they will attain the LQP status?

SF	Yes
DCJ	What advantages will it bring?
SF	Shown in my Appendices.
DCJ	Para 2.6: "to reach LQP standard by 2020". When is NGT proposed to be completed?
SF	I'm not sure
DCJ	If it's after 2020, it'll have attained that status won't it?
SF	Will depend upon NGT and how quickly the mitigation works are in place.
DCJ	Is the 2020 target depending on NGT?
SF	No it's a target for all Green Spaces?
DCJ	So wouldn't it happen anyway?
SF	It's a target but depends on the investment.
DCJ	You argue the only way to get investment is NGT?
SF	No not necessarily - are other sources of funding like s.106 agreements.
DCJ	Wouldn't it happen anyway?
SF	It's the objective but may be that we can't deliver given other priorities.
DCJ	When the parcels of land were appropriated why was it advertised in the Yorkshire Post not the Evening Post?
SF	Don't know - I wasn't the decision-maker.
DCJ	Would you agree Hyde Park and Woodhouse ward has high popn density, South Asian ancestry with diabetes and deprivation?
SF	I'm not aware of details.
DCJ	You say the PoE is based on the "Green Spaces Strategy". The fourth aim is health and wellbeing.
SF	Yes.
DCJ	Refers to obesity and exercise; research on mental and physical wellbeing?
SF	Yes.
DCJ	Do you know that major planning applications use existence of Woodhouse Moor as excuse to provide less green space?
SF	No.
DCJ	The green space strategy doesn't refer to NGT because it would be inconsistent?
SF	It isn't a transport strategy.
DCJ	Won't people be discouraged from using Belle Isle Circus and Woodhouse Moor and isn't it in conflict with the Green Spaces Strategy.
SF	I've demonstrated that on Woodhouse Moor the amount of recreational space increased.
DCJ	In para 4.4 of Green Space Strategy it means routes lined with trees and grass?
SF	Yes.
DCJ	Loss of 400 trees along the route - what impacts on health?
SF	I'm not an expert on the whole route.
DCJ	Most of the increased scores relate to maps, signage and marketing. Isn't the main draw the green space?
SF	No that is equally important and that's why it gets the same score - to impart information and give it a sense of space. Important to have as part of a quality park.
DCJ	Marketing doesn't relate?
SF	Yes - important for people to use it?
DCJ	Woodhouse Moor is already the most intensively used park so doesn't need anything else to draw people?
SF	We want to encourage more use and at different times of day.
DCJ	In your rebuttal to OBJ-1641 para 2.1.1, it directs us back to para 4.1 of the Proof in relation to our point about schools having less than the statutory minimum open space.
MW	Did you write this rebuttal?
SF	Yes.
DCJ	The objection was to loss of quantity not quality so this doesn't deal with that, does it?
SF	But this shows that the quality improves. It's not the amount of green space that's important but the quality and how inviting it is. There are deprived areas with access to lots of green space and the issue there is the quality.

DCJ	In an area of back-to-back terraces and health problems and deprivation is due to diabetes and cardiovascular disease isn't it?
SF	I don't think I can answer that.
DCJ	You've talked about the playground on Cinder Moor as well. It was well-used by children who could get to it without crossing the road. Why was it removed?
SF	We do a yearly engineering inspection and it was removed because it wasn't safe for children to play on as it was old.
DCJ	What will the informal play space consist of?
SF	The plan shows the rough geographical location - on Little Moor. It will form part of the natural features there. Not necessarily fixed play equipment but imaginative landscaping to facilitate better play value.
DCJ	Next to the new road?
SF	Yes but away from the road in a suitably landscaped area?
DCJ	2 more roads to cross going from Quarrymount Primary School
SF	Maybe I'll not dispute that. But for children under 8 and you'd expect the children to be accompanied by an adult.
DCJ	The old one was used by older children up to 11, looking after younger children.
SF	That was the old one. I should add that there is a better-equipped play area on the main Moor.
DCJ	Good for Hyde Park but not Woodhouse.
SF	That's just a geographical fact.
MW	Mr Foren, Some additional questions.
CF	These fall entirely within his purview and relate to docs referenced in his proof. The tree-planting scheme. You are aware that the mitigation for felling 400 mature trees is a 3-for-1 replanting. Who is responsible for caring for the saplings?
SF	At the end of the handover period will be the responsibility of the Council.
CF	The responsibility of your department?
SF	Yes.
MW	What's the time period?
SF	Depends on the contract - 1 to 3 years,
CF	One of the main causes of death of new trees is they are not watered properly?
SF	Yes could be.
CF	You need a watering regime for 1200 trees?
SF	Yes.
CF	Have you got a budget for it?
SF	No
CF	Could affect economic viability?
SF	Don't know.
CF	No-one's come to speak to you about what will be a long-running period?
SF	You'd expect that a period would be covered by the defects and liability period. Depends on the nature of the contract.
CF	None of this has been discussed ?
SF	Not with me.
CF	Surely you are a key player?
SF	Our interests, our concerns are whether there are funding for operation and whether it was of a standard we're happy to adopt.
CF	Can need 50l of water a day on a dry day? And 1200 of them?
SF	Would depend on the planting methodology, species, ground conditions, and climate. Would be a poor contract that didn't make an allowance for any defects liability or didn't make provision for watering if that was required.
CF	No discussions.
SF	Not with me personally but the Council does have other experts such as in the planning department on trees.
CF	Could this be explained outside the inquiry?

SF	It could be.
CF	2 sites not assessed by you?
SF	Yes 2 were assessed previously in Oct 2013.
CF	How many assessments have you done previously for the effect of major infrastructure?
SF	The first time for major development but we do it all the time for public open space in housing development. I'm also a national Green Flag judge and do those every year.
CF	There's a difference isn't there. On one hand you are looking at what makes a park good quality, but also here you are looking at the impact of the development?
SF	Not what I think but the government's green flag criteria. All I can do is assess the sites by plan as they don't exist.
MW	Not the government's standard - a <u>part</u> government version?
SF	That's right but we've not change any of the Green flag criteria.
CF	You said you had read the MottMacdonald assessment. Was it before or after your assessment?
SF	Can't remember the exact timing. I did the assessment over Christmas and submitted it on 7th January.
CF	Are you familiar with NPPF definition of "open space"?
SF	No. I am aware of it and have seen it and read it in the past but not an expert on it.
CF	Well it says, in definitions section, page 54: "all open space of public value..which offer important opps for recreation and can act as a visual amenity". In Headingley Hill, not zero visual amenity?
SF	No.
CF	Yet you omitted reference to them.
MW	We have spent an hour and a half exploring why it wasn't included. I don't want to waste any more time. It's not going to make any difference whether he agrees with you or not?
CF	It is his responsibility.
SF	If it were accessible then I would have assessed it.
MW	We've been through it in a lot of detail and we're not going to get anywhere.
CF	In other parts of his evidence he refers to other areas of land - look at paras 2.14 and 2.16 of your Proof. That is not publicly accessible as it's owned by the Uni?
SF	Yes
CF	Permissive access?
SF	Yes
CF	As there is at Headingley Hill
SF	I'm not sure there is - Mr Natkus says.
CF	You were the one saying it was permissive as not opposed by the landowner.
SF	You showed me pictures and to be fair I'm not familiar with the site. What I can tell you is it's not public open space.
CF	At 2.16 you say "would encourage...a community use". That would be permissive?
Sf	Yes. I should say that my responsibility is also for recreation and how sports teams can have access.
CF	If the University is prepared to co-operate.
SF	That's why I say a community use agreement as part of the planning consent would be desirable.
CF	Are you saying planning consent should be refused unless the university would co-operate?
SF	Not for me to do the planning negotiations.
RW	Condition 23, Sir.
CF	There are beneficial aspects of open space that exist regardless of access e.g. Ecological aspects...
MW	I'm sorry Mr Foren I'm not going to hear anything else on that. No more questions on that or I will terminate this and stop you. People are giving up work to come here. Don't keep going on about how it's not designated as open space. There are a lot of resources on this and people are wasting money.
CF	I've only been asking since 7 minutes past 3 and it's 3:25 now.
MW	You've had a lot of time already and I'll not let you go over this again.
CF	You say 6% of the area in Belle Isle Circus.
SF	Not my figure.
CF	Can you help with how arrived at?
SF	I assume just looked at area lost to NGT.

MW	That's what I asked and was told both areas either side of the NGT were included.
CF	Not just the area physically occupied but will be visible from 100%?
SF	Yes. The LQP criteria does look at that. You would consider the effects on the park - that 6% does nothing other than look at land take but my assessment looks at it.
CF	Should be better described as "area of land take" not "area affected"?
SF	Yes.
MW	And that is the case for all of them, e.g. On Woodhouse Moor whether that included the space with Woodhouse Lane?
SF	It included the area affected physically. So for page "9 of 21", I would have said;...
RW	Sir shall we check?
MW	If you don't know, just say and it's important and we shall check.
SF	I don't know. I would say that it hasn't had an effect on the LQP assessment.
CF	Just moving on - the point I tried to establish was that a blot o the landscape was not confined to the footprint?
SF	That's correct.
CF	And your evidence is signs and seating at Belle Isle Circus improves the area , even with a trolley bus going through every 3 mins? Reasonable person wouldn't agree.
SF	Yes. But notice boards, path, seats are all improvements acc to the LQP criteria. Not just a reasonable person but used by the government, Netherlands, Germany.
CF	You agree, Stourton is far from ideal for any park?
SF	No.
CF	M621 motorway.
SF	Yes.
CF	Does "tranquility" appear in the LQP criteria?
SF	It's relevant.
CF	You'd have to be optimistic to say there was any tranquility- parking for 600 cars coming and going and the M621 roaring past.
SF	Well...we have a cemetery located there and the old part of the cemetery is tranquil place to relax. The mature tree planting suppresses a lot of the noise and it provides a space that those terraced houses can access.
CF	On the periphery of the park and ride, and isn't central to the NGT plan but squeezed in at the margins?
SF	I'd rather it were linked into other green spaces and be linear than be an island.
CF	I'd put it to you that it's a marginal recreational benefit.
SF	I disagree- it's fit for purpose in terms of what it provides.
CF	A lot of the improvements could be accomplished easily outside of the auspices of this development?
SF	The limiting factor is the amount of funding. Currently, no capital allocation available for discretionary spending. The only funding is section 106 obligations and developments.
CF	But £75m is being put into trolley bus.
MW	We'll re-examine, have a break and get on with next witness.
RW	If you take the Appendix and your scoring schedules. Take Belle Isle - uplift from signage from 0 to 7. See how that feeds into the totals. 162 - current. And 172 NGT. What happens then with averaging and multiplying?
SF	Cumulative total is divided....
RW	If you took out the signage is there still an improvement?
SF	I would imagine but the score would go down.
RW	Design and Access Statement A-08k p.58 - tree specification at 2.10.23. What have we got there?
SF	It's saying semi-mature, girth 20-5cm and height minimum 450cm so not insubstantial.
MW	Thank you. I'll have a 15 minute break [15:46]. How long will your EIC be?
NC qc	We'll not get through all of it.
	<b>Examination in Chief of Mr Paul Hanson</b>
MW	[4pm] We've resumed. Any matters arising?

RW	We've the long-awaited errata from Mr Ward.
NC	Sir I've prepared a list of the documents. Not dissimilar to Mr Bonsall's list of docs for cross-examination.
NC	Mr Paul Hanson('PH') - you are responsible for the technical excellence of AECOM's modelling?
PH	That's right.
NC	Degree in mathematics. Specialism in forecasting demand for travel across all modes of transport. Research and also contribution to guidance. Included national guidance?
PH	It has.
NC	Which set?
PH	Elements relating to variable demand modelling, how people change their mode, destination choice, perception of quality.
NC	What docs?
PH	WebTAG.
NC	In E Series of Core Docs. Now read your summary.
PH	[Reads- Leeds Transport Model informs ecological and business case. Appropriate level of detail. DfT guidance- demand model, assignment model and public transport assignment model. We developed these models using quality data. Refined to respond appropriately. Outputs comply with WebTAG guidance tolerances. They are not directly suitable for junction design but am satisfied appropriate care taken to interpret them for this purpose. Forecast to capture over half the demand in the corridor and total use of public transport to increase by 50%. So will reduce bus patronage by 1/3. Sensitivity testing shows n major differences. They claim that charging the same fare of buses would increase demand by [just] 2%. Continuing the existing bus frequency would reduce demand for NGT by only 4%.]
NC	Before we delve into detail, errata have been provided by Mr Robertson at APP-4 (corrections to rebuttal to West Park Residents' Assocn). For you to note Sir.
MW	Agreed with you Mr Hanson?
PH	It is- we wrote it together.
NC	When first instructed in relation to transport modelling in Leeds.
PH	Was apptd in 2008.
NC	What were you instructed to do?
PH	Primarily in relation to Transport Innovation Fund. Transport modelling for Leeds generally.
NC	C-2-6 note from AECOM: "Demand Model Report". Intro: describes specification and calibration of the demand model that's part of Leeds Transport Model ('LTM'). Para 1.3- is that the fund you refer to?
PH	Correct.
NC	Table 1.1 Refs to fiscal and demand management measures - what were being considered at that time?
PH	Congestion charging and reductions in parking spaces for example.
NC	What do we find under Park&Ride?
PH	"implementation of rail, tram, and bus based Park and Ride".
NC	Was bus rapid transit considered at that time?
PH	It was- one of the thinks
NC	C-2-72.1 page 12. Table 1: Transport Innovation Fund a key consideration. Was it also envisaged that it would be used for major funding bids in particular for NGT?
PH	Correct.
NC	C-2-8 "Local Model Validation Report" - refs at 2.1 refs to TIF and to BRT?
PH	We do yes.
NC	Were you responsible for the 2009 business case submission?
PH	No I was not involved in that.
NC	C-6-8- DfT response. Letter [23 March 2010] in response to major scheme business case submission of 31 Oct 2009. Can we look at the Programme Entry Conditions on the second page. Says it must be "based on Metro's new transport model". What d you understand by that?
PH	The LTM.
NC	So you were not responsible for that application but they asked to use the LTM.
PH	Yes.
NC	Then the other business case submissions - did you have an input into that?
PH	I had an input into both.

NC	Take up your PoE. So we see the structure. At 3.10 you refer to the role of the demand model. At 3.11 the role of the highway assignment model. And 3.12 the public transport assignment model. Are those the 3 main elements with which we are concerned?
PH	That's right.
NC	On methodology, you've already referred to WebTAG. You refer at para 3.9. Is the general guidance to be found in WebTAG guidance?
PH	It is - WebTAG is a large tome of work that suggests how the modeling is to be done.
NC	Regularly updated?
PH	It is.
NC	There are benchmarks set in WebTAG, is that right?
PH	There are. There are tolerances for the standard.
NC	If we take up E-3-25, WebTAG Unit 3.19 Highway Assignment Modelling. And 8-3-17 you quote from is at p.47. Refers to small scale models. Why is it said it's less achievable to reach the benchmark criteria for large-scale models?
PH	Contain a large amount of data and it takes a large amount of resource to reconcile all the data. The models are for assessing schemes rather than strategies across a wide area.
NC	So how are strategies distinguished from schemes?
PH	A strategy would be an initial stage of developing public transport in a corridor and whether that is a benefit. Rather than a specific scheme like NGT.
NC	If you use it for a scheme, what degree of accuracy can you expect?
PH	The degree of accuracy is as set out. For a strategy at early stages I would expect wider tolerances/
MW	You mean less accuracy?
PH	Yes.
NC	Is there an element of proportionality?
PH	Yes the degree of detail should be proportionate to the demands on it.
NC	C-2-3.
PH	A diagram showing the points the surveys were done.
NC	Wide area of Leeds. 2.1.1 and 2.2. Is that sufficiently up-to-date for the purposes for which it is relied upon?
PH	Yes.
NC	And a document here...APP-127.
MW	Can everyone have a copy please.
NC	Has extracts from guidance. What does it say?
PH	Says the data should not be more than 5 or 6 years old and steps should be taken to review it.
NC	Do you necessarily collect new data?
PH	You review it and if the data are relevant and consistent with the traffic on the ground today you don't.
NC	What do you mean "relevant"?
PH	Outputs would be tested against the same criteria.
NC	In your proof you refer to sensitivity tests. Where should we be looking in C-2-9?
PH	This doc describes testing of the model as the LTM was first applied. Section 7 is showing some of the work that was done at the time considering how the model related to the highway impacts. It illustrates where the impacts on flows were forecast to occur.
NC	You referred to it as a sensitivity test?
PH	Better to describe it as a sense check looking at the output of the model. The figures are area-wide. In part, the purpose was to consider whether the model was stable outside Leeds where it represented the network in less detail.
NC	Where we are was, in March 2010 they (govt) wrote and said all well and good but next time use the LTM. Then we had 2011 'best and final' where the LTM was used. This is in 2012 when after a slight hiatus we have the next business case submission. You say a sense check and it is performing as you would expect, with the NGT?
PH	Correct.
NC	At 3.31 of your Proof. If we look at 3.28 you say there was detailed scrutiny by DfT. Can you explain - did the C-2 suite of documents just go in or was there some discussion about modelling?
PH	I would describe it as a dialogue.

NC	If we go to C-2. 7.17 What were the main changes that were made?
PH	The first area was to review the quality differential of NGT and how that was interpreted- the value that passengers attach to quality.
NC	We'll come back under "generalised journey time" to how one assigns that.
MW	Use plainer language- this is from interviews.
PH	7.18 is about how people choose between bus and NGT. And 7.19 journey times.
NC	Para 7.20 refers to discussions with DfT on the amendments to the modelling. Just for your note Sir, Appdx C-2-32 is the business case.... Is that a document that was discussed with DfT
PH	It is.
NC	When it refers to C-2-34 it means this document?
PH	Yes.
NC	This is done, you discuss with DfT whether you can use the model, you've submitted it and C-6-15 is the DfT response [13 March 2012].
MW	Mr Cameron can we find a convenient time after 5 o'clock. I don't want to go a lot over.
NC	We're still on development of the LTM but we can get onto suitability of the model tomorrow.
	Mr Hanson, did DfT in this letter indicate any concern about using this model?
PH	No.
NC	Now at 3.33 of your Proof. You say additional functionality was added, as contained in the Update. Can we take up that document? C-1-3. Called "LTM Update". Additional data at 2.2, and changes made specified at 2.3. What does it mean "improvements to coding"?
PH	More detailed representation of the junctions and the network.
NC	And additional data collected in connection with Park and Ride?
PH	That's right. In the original model there had been no data on Park and Ride.
NC	Are such changes normal?
PH	It is- you collect more data and make refinements appropriate for its use.
MW	We'll adjourn till 10am tomorrow. Then Mr Bonsall then Mr Jones.
	How long?
NC	1hr and a half.
Bnsall	I'll need the rest of the day.
MW	Inquiry is adjourned.