

11 June 2014

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MW	Have made a site visit - gate saying no access at Oakfield. And a paved access to Monument Moor near Raglan Road.
NC	A document just been handed by Prof Bonsall to me 10 minutes ago. Can't discuss it with Mr Hanson. Verging on unreasonable behaviour - dated 28 April.
CB	Explains that he wanted to give evidence on it when <i>he</i> gave evidence and it was not for questioning upon.
MW	You must understand, it compromises the applicants because their expert hasn't had a chance to discuss it with Mr Cameron. Strictly speaking new evidence should not be submitted unless it's changes to what you've already said.
NC	May be that once we've read it we can deal with it but I would want to reserve a right for Mr Hanson to respond in writing. Fairness of the system requires it to go in before the witness has considered it and points of substance must be put to Mr Hanson so he can comment on it.
CB	To be frank, I've not read it myself since April and it's for my evidence.
NC	If there is a point in Mr Hanson's evidence that he disputes, it's not sufficient to put it in Mr Bonsall's evidence but must put it to him in fairness.
CB	Simplest way to deal with it would be to add 10 minutes in the morning.
NC	Mr Bonsall's suggestion would meet that difficulty and I think I'll need longer than one and a half hours in chief so he'll still be cross-examining tomorrow anyway.
GJ	Sir, there is one note for which no explanation has been given as to why it's so late. Mr Cheek is on holiday this week and there may be the odd thing that may come up. I don't want to hold things up - because I haven't spoken with him.
NC	Acceptability guidelines- need WebTAG Unit 3.19 E-3-25 para 3.2.8 Table 2 and 3.4. How do you determine whether a model is fit for purpose?
PH	A combo of the accuracy of the model and particularly the sensitivity of the model - the appropriateness of the responses.
NC	C-1-3 Transport Model Update, p.8, heading 2.4 validation along the NGT corridor. 2.4.1.1. You've compared output of the model with the observed flows?
PH	Correct.
NC	What do passes and fails indicate?
PH	That outputs are within the tolerances.
NC	And 80% of these counts meet WebTAG...what?
PH	Should say "criteria".
NC	With that outcome, is the model fit for purpose?
PH	Yes it is fit for purpose and adequate.
NC	That table relates to the Highway model?
PH	That's correct.
NC	If we go on, we see section 3 is the public transport model. How does that perform against the validation criteria?
PH	Comparisons are made if you move to pages 23-4 and tables 3,4 and 5. The counts are within the tolerance set out in WebTAG in all cases within the corridor and adjacent

	corridors.
NC	We know it is not necessarily fit for purpose of it comes within the criteria. Is it fit for purpose or not?
PH	Yes it's fit for purpose.
NC	Let's look at odel sensitivity. E-3-12 WebTAG Unit 3.10. We've guidance on realism and sensitivity. You say when assessing fitness for purpose. If we look at page 8, there's a heading "tests required". And C-1-3: have the tests been carried out?
PH	Yes the tests have been carried out; the relevant section is section 5, pages 50-51 of C-1-3.
NC	Do they lie within the specified bands?
PH	They do
BC	What do they tell us about fitness for purpose
PH	Lies within bands that the guidance judges are plausible and within tolerances
NC	What does that tell us about fitness for purpose?
PH	It is fit for purpose.
NC	Tell us?C-1-8: forecasting and NGT central case. Refs are provided in your proof. What does C-1-8 tell us?
PH	About forecast demand of NGT.
NC	If we just take the example on page 21, table 21 trips by time period car and table 24 pubic transport. That's for "do-minimum is it?
PH	Yes how car traffic is forecast to grow over time and public transport is forecast to grow over time.
NC	Section 4 is forecast with NGT?
PH	Yes section 4 how NGT is represented and section 5 is showing effects of NGT on demand.
NC	Can we go to section 7 of your proof, headed "alternative options". Section 7.2 in your proof. You say you model the preferred option, the next-best alternative (NBA) and low-cost alternative (LCA) for the business case?
PH	That's right.
NC	Then you say the LCA incorrectly applied reduced services assumed in the central case (or preferred option)rather than their existing frequency. Incorrectly transposed?
PH	That's right, yes we made a mistake.
NC	There's a history here. You referred to C-1-9. Is that headed "NGT since sensitivity testing"?
PH	Yes.
NC	If we look at fig4 p.17, is that one that has to be changed?
PH	That's right.
NC	Then the appendices to your PoE. At APP5.3 there's a reappraisal of it - page 14 of 30 is that the equivalent figure?
PH	It is.
NC	We have to go to APP104. A further change. Does that replace Appendix 3?
PH	It does. There was a further mistake in the inputs - the quality of the bus stops for the LCA had not been represented.
MW	Regarding the quality of the bus stops?
PH	The test in my proof assumed no investments made in the bus stops, no improvements.
NC	It has or should be assumed that there would be an improvement in the bus stops but that was not fed in?

PH	Yes.
NC	So APP104 that's the latest version of the modelling work on the LCA and that feeds into Mr Chadwick's work on VfM? So he's the person to ask on consequences for VfM?
PH	That's right.
NC	If we put that to one side and go to your Proof at 7.3, you say in addition to these alternative options (to NBA and LCA?)
PH	It is- further variations.
NC	You set them out at 7.3. Those are in addition. Do we also need to look at your appendices on this matter?
PH	These are set out in my appendices, that's right.
NC	You've got a section 8: implications of forecasting uncertainties. You come to the conclusion at 8.21 that the impacts on public transport and highway network are not significantly affected by forecasting uncertainties. If we take up the NWLTF Rebuttal.
MW	Sorry, <i>your</i> rebuttal?
NC	No, their "compendious rebuttal" including a rebuttal to Mr Hanson- OBJ1719, NLTF-5. We need to go to page 12 para 6.12. Can I invite you to give your response to Forum's rejection of your claim?
PH	I think I'll work upwards. In terms of the latter point, that's referring to a comment at 8.13 of my proof where there was, there is, a misrepresentation of fares in the model. Those do not materially affect the forecasts, as I've shown, for the sensitivities. In terms of the second point, what I'm referring to are the effects of the NGT scheme and I'm not referring to the uncertainties in the NGT forecasts themselves. With the first point, I have considered a broad range of uncertainties in Leeds and shown that the outcomes are similar irrespective of the growth of travel in Leeds.
NC	On the second point, is it appropriate to have such a combination of tests?
PH	There are some contexts where that can be done. The question is one of proportionality. To undertake such tests would involve a considerable amount of work, beyond the level that is needed, so I consider that what I've done is sufficient.
NC	Next heading, questions under the general heading "response to Mr Cheek". We'll then come back to NWLTF. So the purpose of these Qs are responding to Mr Cheek's rebuttal evidence.
MW	You want me to get out Mr Cheek's rebuttal?
NC	Sir, 92309 and Mr Cheek's original PoE. Let's start with Mr Cheek's Proof. 6.2 of his Proof, a significant difference between you and him and need to get your view on it. He says the report at Appendix 2 to his proof concludes that the forecast patronage on NGT is overstated by up to 42% and gives his reasons. If you turn to his Appendix 2 he's got a number of tables here. Page 38 internally numbered. Tables 19 and 20.
PH	I believe this was updated last Friday which was an errata to these 2 tables.
GJ	Sorry, Tab 2 of his appendices, page 44?
NC	Handwritten.
NC	So we've got that. He's got heading Promoters' estimates, and TAS estimates. Before going to his revisions, take up APP-126. You here respond to his contention in his "supplementary rebuttal". He says witch overstated by at least 100%. Do you agree?
PH	No
Nc	Why?
PH	At APP126 I've attempted to explain the differences between Mr Cheek's analysis and the forecasts I presnted. I started at para 1.1 with the 28,000 passengers Mr Cheek's estimated to divert and observed at para 1.2 that there appears to be a transcription error in Mr Cheek's analysis.

NC	That's table at C-1 table 12.4 promoter's business base, 3rd preferred option demand forecasts. Can you explain that please? And look at Table 9 in Appendix 2 to Mr Cheek (p.29 handwritten).
PH	If you read the number transferred from "bus".
NC	Mr Cheek uses different descriptors for his headings. His heading is "full transfer" that's equivalent to "transfer". The figure for inter-peak is 1921 but the figure is actually 1428. That affects the totals so it should be 2019 instead of 2154. Then you have to apply a multiplier.
PH	You've probably explained it better than I did. The first category is someone from West Leeds coming down to Belle Isle by bus. The second category is one that would take the bus from West Leeds and the walk. The distinction between them is part of the misunderstanding. The first category are estimated by Mr Cheek because he's observed people boarding buses. But the next category are acc to Mr Cheek's category "new" travel. So in observing how many passengers come from existing buses only the first grpup are taken into account. NGT would provide a more direct route so there is a transfer e.g. from people who walk from south Leeds. Roughly half are existing bus users and half new bus users (ones who would have walked)
MW	You mean who would have walked but now take NGT?
PH	Correct.
NC	You're looking at each component with which you disagree. The wrong figures took off 391. The intercahnce takes of 3467?
PH	Yes.
NC	When we've dealt with that one, we come onto a different point again.
PH	The point is NGT would improve the quality of pub transport along A660 so people would instead of walking to adjacent bus services would walk across to use NGT,
MW	You say, people using a different corridor would transfer to NGT because it would provide a better service?
PH	Yes. Meanwood is half a mile further east. When I analysed that, that's just over 4,000 users on bus who are forecast to come from adjacent corridors. Taken together, the forecast of passengers from the NGT corridor is just over 17,000. I've noted that Mr Cheek has used data from 2013 but we forecast in 2016 when growth is projected, so again would be a reduction in the number of transfers adjusting that. So 14,000 would transfer which is about 2/3 of the demand that Mr Cheek estimates.
NC	In simple terms if we look at transfer from bus in the NGT corridor the fig isn't Mr Cheek's 28715 but 16238?
PH	That's right.
NC	Looking at a like-for-like basis you get to 16,000 or so transferred. If we look at FWY-119 at 7.3, he says he does not expect NGT would be perceived as being of higher quality than existing bus services. What's your response and how you treat it in the model. Is it right to treat it equally?
PH	No I think it's right that there's a lot of evidence that NGT would provide an increase in quality.
NC	Is that for Mr Chadwick to take in addition to you?
PH	In addition - Mr Chadwick has done work on quality assumptions.
NC	Your rebuttal to Mr Cheek REB3-OBJ923
PH	Haven't tried to replicate the forecast but I ended up with results that were very comparable and ended up with results I would expect. Mr Cheek estimated 15,000 boarding and I estimated 16,200 boarding and alighting.
NC	So not a complete comparison. But taking account of fact that yours are slightly more

	restrictive, within the tolerance you would expect, is the LTM giving a prediction within the acceptability guidelines?
PH	[Smiles] It suggests the forecasts are representing the traffic volumes that are observed today.
MW	The answer's yes?
PH	Yes.
NC	Para 4.2 of Mr Cheek's rebuttal. He says overstates bus trips by a substantial margin. Is that right?
PH	No - on the data it's consistent.
NC	So Mr Cheek's estimate taken from First data - to which you don't have access?
P{H	I had access to their data from 2008 but no not to their current data.
NC	Different numbers- his board only, yours board and alight, but sufficiently similar similar on your evidence to indicate the LTM is producing a prediction within the margins you would expect?
PH	Yes that's right.
NC	Can I just deal with 1 other topic under this heading. In Mr Cheek's Appendix 2 we've got your response. But go to Supplementary rebuttal of Mr Cheek FWY-119. He's got a section 3 "Park and ride occupancy" and some tables which deal with this. His concern is at 3.3. "the occupancy would be over 80% and the promoters' growth figures suggest that the car park would be full within 5 years of opening". Can we take up C-1-8 and fig.18 "P&R occupancy", page 51. Based on that graph, will it be full after 5 years?
PH	No - 840 occupancy in 2031 which is less than complete occupancy.
NC	So is he right about that?
PH	No - those are not the forecast.
NC	Good time to break.
MW	[11:30] - will adjourn till quarter to 12.