Mike Axon (Vectos) Response to KBLR Representations – September 2022

KBLR has made representations to the Inquiry.

The transport matters dealt with by the representations have already been tested at the Inquiry. However, I have highlighted matters where this might be helpful.

Trip Forecasting

Sections 3-7 of the KBLR report present a KBLR derived vehicle trip forecast. The KBLR approach is a first principle approach to trip forecasting. It relies upon assumptions. Some of the assumptions are derived from documents that are geographically specific to areas that are not this area.

I do not recognise or accept the assumptions that have been made.

I note that there are factors which have either been applied incorrectly, or not applied at all. I have undertaken a basic assessment of how the KBLR development trip numbers would change as a result of making two adjustments as an example.

The first adjustment relates to working from home.

At Section 6.1, KBLR takes the Vectos 'work from home' adjustment figure of 5% and applies it to its assessment. The 5% figure in the Vectos work is an adjustment to take into account the difference between a work from home ratio embedded within the TRICS data that Vectos used (but KBLR does not) and that measured and expected now and in the future (by Vectos).

The KBLR doesn't use TRICS. It derives a figure for work travel in a different way. Using the KBLR method there is no embedded work from home proportion, and therefore applying a subsequent factor, as KBLR has sought to do, must take into account the 'absolute work from home at any time' proportion.

As described in my evidence, this absolute proportion is 25%.

The second adjustment relates to holidays and sickness.

The first principle approach by KBLR assumes that everyone in the working population goes to work every day. This is not the case. I have applied a 10% reduction as an allowance for holidays and sickness.

Applying just these two adjustments to the KBLR work reduces the KBLR 12 hour workplace departures by people in cars to 716 people from 1,008. This compares with the Vectos assessment of the same (Table 6.5 of the Transport Assessment CD1.68) which is 676 (the sum of car drivers and passengers).

The context is the other vaguaries and unknowns (not supported in the evidence) in other assumptions in the KBLR first principle assessment, including the unsubstantiated KBLR judgement that it will not use the Vectos locally derived proportions for distance of travel to work. Given this, the differences between the KBLR assessment, and the Vectos assessment are not substantive.

This is the KBLR starting point for traffic assessment. Adjusting this starting point in the way I have done here will flow through the rest of the traffic forecasting work.

School Capacity and School Demand

Education policy and practice is not something that I comment on. I note the KBLR traffic approach that the local Primary schools will not be available to children from the site. This is not a phenomenon that I recognise or which I have seen stated elsewhere.

I note that the development proposals include a Primary school.

KBLR makes a theoretical calculation about schoolchild generation on a first principle basis based on demographics and housing mix. I see no reason to accept this as reasonable.

I note that the LEA is satisfied on school capacity and school demand.

This does not give me cause to adjust the Vectos estimates which are based on observed effects, reported by industry standard databases.

Committed Developments

KBLR has undertaken its own estimate of committed developments and traffic from committed developments.

I do not accept that assessment.

I note that on the matter of committed developments there is agreement between the Appellant and the County Council on the developments to be included.

Traffic Impact

KBLR uses its alternative trip forecasting methodology to derive higher trip forecasts for the proposed development and also the committed developments. They then use this higher trip forecasting to derive different journey time differences (as a result of the development) compared with those reported in either the microsimulation modelling results presented by Vectos, or the strategic model reported by the County in respect of the A582 dualling scheme. KBLR uses journey time as the metric by which acceptability or not is determined.

For the reasons set out above and at the Inquiry I do not accept these results are as reasonable or likely future forecast of effect.

Economic and CO2 Impact

KBLR has made the broad assumption that journey time delay is proportional to traffic flow.

This is not a reasonable assumption. The results from the microsimulation model presented in my evidence show a reasonable approximation of the relationship between demand flows and journey time changes across the day.

The remainder of the KBLR assessment relies upon this assumption. In that this is not a reasonable assumption the quantum of effect reported by KBLR is not reasonable.

KBLR equates journey time changes to a notional net cost, on the basis that any increase in journey time has a tangible cost, which in addition is not balanced by any other elements. This is not an assessment that I recognise or accept in this context, either in mathematical terms or in principle.

Similarly KBLR relates journey time to net carbon emissions. This is not an assessment that I recognise or accept in this context, either in mathematical terms of in principle.

Vision & Validate

KBLR said that V&V appears highly idealistic. I do not agree, as it is the current approach expected in both policy and guidance.