

**APPEAL BY PEEL INVESTMENTS (NORTH) LIMITED  
SALFORD FOREST PARK, SALFORD  
TOWN & COUNTRY PLANNING ACT 1990  
SALFORD CITY COUNCIL  
(LPA REF:04/48900/HYBEIA)  
WIGAN METROPOLITAN BOROUGH COUNCIL  
(LPA REF: A/04/61939)  
PINS REF: APP/V4250/A/08/2089891/NWF  
and APP/U4230/A/08/2089906**

**REBUTTAL TRANSPORT PROOF OF EVIDENCE OF  
MIKE HIBBERT (MSc MCIT MIHT MILT MIOd DipEng)**

**VOLUME 1 OF 1 APP/15  
SUBMITTED IN ACCORDANCE WITH  
THE INSPECTOR'S INSTRUCTIONS**

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## 1.0 INTRODUCTION & BACKGROUND

1.1 My name is Mike Hibbert. My qualifications and experience are set out in my main proof of evidence.

1.2 This rebuttal proof has been prepared in response to evidence presented by Salford City Councillors Heywood, Ferrer and Tope and Mr Dmoch on behalf of RAGE.

## **2.0 RESPONSE TO EVIDENCE PRESENTED BY COUNCILLOR HEYWOOD**

- 2.1 Councillor Heywood comments in item 5 on the first page of her evidence that no mention has been made of the proposed widening of the motorway which in her view would increase the volume of traffic.
- 2.2 These proposals have emerged from the Highways Agency's JETTS proposals. I first mentioned JETTS within the 2004 TA and at that time the proposals contained a range of measures, including widening of the motorway in an anti-clockwise direction between Junctions 15 to 12 with other grade separated slip roads beyond J13 in order for some trips to bypass Junction 12. However, at that time, further consideration was being given to shorter term alternative measures and so the full JETTS scheme was never pursued.
- 2.3 The latest proposal is essentially a traffic management scheme. In particular, an additional lane will be created within the current highway, through the use of narrow lanes between Junctions 12 and 15 in the eastbound (anti-clockwise) direction with the use of the hard shoulder being permitted between Junctions 8 and 12.
- 2.4 This will ease congestion by managing speeds more effectively within this part of the motorway network.
- 2.5 I do not expect that these traffic management schemes in isolation would result in any significant increase in peak hour trips, which will

be constrained in any event by the wider network. I make reference to this point in section 16.3 of my main proof.

2.6 The Highways Agency has not sought any further testing from me in relation to their pursuit of these latest proposals.

### **3.0 RESPONSE TO EVIDENCE PRESENTED BY COUNCILLOR FERRER**

3.1 Councillor Ferrer suggests that she has concerns because she believes 'the survey' was carried out during school holidays.

3.2 It is not clear which of the many surveys the proposals have been tested against Councillor Ferrer is referring to but I have not been able to find any evidence that any of the surveys were undertaken during school holidays.

3.3 In any event, the proposals do not rely merely on the tests of one survey. As explained within my main proof, they have been tested many times against several surveys, not least one provided to me by the Council's own officers.

3.4 Irrespective of which survey has been used, the proposed improvements have been shown to be robust.

#### **4.0 RESPONSE TO EVIDENCE PRESENTED BY COUNCILLOR TOPE**

4.1 Councillor Tope suggests that from her experience of driving past Haydock Park on race days, she has witnessed that:

*'the traffic load is primarily cars and small people carriers, and not, as predicted, multi-occupancy vehicles such as coaches etc, the traffic congestion will be higher than stated in the TRICS database.'*

4.2 I need to clarify some points in relation to this misunderstanding of the assessment.

4.3 Firstly, the vehicle occupancies that have been adopted within the assessment work have been based on full surveys of activity at several racecourses. These surveys sought to establish the numbers of people per vehicle and are part of the calculation to convert spectator numbers to vehicle numbers.

4.4 As part of their detailed review of my assessments, the Highways Agency carried out their own detailed surveys of other racecourses. Some of these results showed higher occupancy levels than I had adopted within my calculations (i.e. fewer vehicles for more people).

4.5 Another component to the calculations is the mode split – the means of travel used. Within my calculations I adopted a figure of 82% arrivals by car against a National Average of 77% and figures obtained by the Highways Agency from its surveys of between 62% and 88%.

4.6 The TRICS database has not been used within the calculations of the racecourse trip generations. Racecourse trips have been derived

from first principles through detailed surveys and independent figures rather than general observations through driving past a single site on a race day.

## 5.0 RESPONSE TO EVIDENCE PRESENTED BY MR DMOCH

- 5.1 Before dealing with some of the more specific points, I note that Mr Dmoch makes several references throughout his evidence to alleged deficiencies within the Salford Forest Park (SFP) assessment work. However, despite these suggestions, none of his evidence actually demonstrates that the proposals would result in harm.
- 5.2 I note that Mr Dmoch does not criticise any of the background surveys, SFP trip generation, distribution or assignment calculations undertaken in connection with the SFP proposals. Nor does he offer any technical criticism of any of the tests which have actually been carried out. Mr Dmoch only takes issue with what he complains has not been done.
- 5.3 Within his sections 2.3 to 2.12, Mr Dmoch criticises the extent of the modelling work undertaken in connection with SFP.
- 5.4 His first point is that highway links have not been assessed in addition to junction capacity. The assessment work has focused on junctions as it is at these locations where the most significant problems exist and where the proposals would result in the greatest concentration of trips. In terms of the consideration of SFP, the locations assessed are where the main constraints exist.
- 5.5 As described within my assessment work, owing to the access strategy adopted for the proposals, there would be no need for anything other than very local traffic (ie those with a Worsley or Boothstown trip end) to use local roads. The traffic impact on these urban roads, which Mr Dmoch does not challenge, is minimal.

- 5.6 In such circumstances, and having tackled the areas where the greatest impacts would be experienced, an assessment of urban links in accordance with TD19/99 would be a pointless exercise.
- 5.7 Mr Dmoch has details of the traffic impacts of the proposals and so he could have undertaken such an exercise himself and presented his findings in his evidence if he genuinely believed it to be a concern.
- 5.8 In section 2.4, Mr Dmoch criticises the work undertaken by JMP on behalf of Salford City Council and the Highways Agency. I should firstly point out that I have not been party to this work – this was modelling work carried out by JMP to review the proposals independently.
- 5.9 From this point of view, it is not my responsibility to defend. However, I note that again, Mr Dmoch does not provide any evidence which demonstrates a problem – he merely asserts that this work has not gone far enough although even then he is not specific as to what he believes should be included.
- 5.10 In section 2.4, Mr Dmoch states even if the flow of traffic at the J13 roundabouts was marginally improved this would not be offset by a redistribution of traffic from elsewhere. He goes on in section 2.5 to suggest that the SFP scheme should have examined Junctions 14 and 15. In so far as he is suggesting that the proposals should be responsible for other non-specified problems on the wider network, it should be remembered that the SFP improvements are proposed to mitigate against the implications which the SFP scheme results in – it is not the responsibility of the Appellant to resolve all existing highway issues within the North-West or wider network.

- 5.11 As indicated earlier, Mr Dmoch has not actually challenged any of the technical assessment work undertaken nor its conclusions and so I am not clear what he is basing his 'marginal improvement' comment on in his section 2.4.
- 5.12 The assessment which Mr Dmoch is criticising in this particular instance in section 2.4 of his evidence is not my work but work carried out by JMP on behalf of Salford City Council and the Highways Agency, the highway authority responsible for the wider strategic network. JMP have considered these proposals in considerable detail over many years and have concluded that there is no basis for objection. That conclusion is shared by the Agency itself and by highways officers at Salford and Wigan Councils.
- 5.13 Within section 2.6, Mr Dmoch makes reference to 8 to 9 race events per year not having been assessed against a number of other scenarios which he suggests result in 'substantial highway problems', which again he does not quantify. I am unclear as to Mr Dmoch reference to 8 to 9 race events – presumably he is looking at a particular time period but I have been unable to deduce what period this could be. He later makes reference to 9 'major' events but this doesn't appear to match my assessment work and so perhaps Mr Dmoch has misunderstood what is being proposed.
- 5.14 The proposed improvements associated with SFP will still provide benefits during the scenarios Mr Dmoch lists. However, I note that he also makes reference to motorway/highway incidents. Mr Dmoch will be aware that such scenarios are not the normal basis of assessment.

- 5.15 In section 2.8, Mr Dmoch suggests that the highway benefits resulting from the proposals are “perceived” and “minor” and yet he provides no technical critique of the assessments, other than to suggest that the scenarios examined do not go far enough.
- 5.16 Mr Dmoch states in section 2.9 that due to the local network being predicted to operate at or above capacity without development, any new trips to the area will result in deterioration to network operations. Of course, the SFP development includes substantial improvements which address key areas of congestion and which more than mitigate the implications of the proposals.
- 5.17 Sections 2.11 and 2.12 of Mr Dmoch’s evidence refer to the M60 widening proposals. Similar points are made by Councillor Heywood. I have dealt with comments relating this matter in Section 2 of this rebuttal.
- 5.18 With respect to sustainability, Mr Dmoch’s comments do not reflect the efforts and commitments dedicated towards encouraging non-car modes. Again, Mr Dmoch focuses his attention on complaining about what has not been done rather than being able to provide any criticism of what has been proposed.
- 5.19 Section 14 of my main proof of evidence sets out the sustainable transport measures and the non-car accessibility considerations of the proposals.
- 5.20 These include a range of on-site measures, such as the provision of a network of paths and trails for pedestrian, cycle and equestrian use, priority drop-off/pick-up areas for bus users close to the Grandstand, priority egress for bus/coach/taxi/high occupancy

vehicles, priority parking locations for cyclists, coaches and high-occupancy vehicles.

- 5.21 Off site, the proposals provide improved crossing facilities at the access points to the Site with connections to proposed on-site paths, the provision of event day off-site shuttle bus services to Walkden station and Eccles Interchange and the ability to service bus diversions directly into the site.
- 5.22 The Travel Plan has been developed during the planning period in conjunction with officers from the local authorities and the Greater Manchester Passenger Transport Executive as well as the Highways Agency. All of these consultees have agreed the Travel Plan.
- 5.23 Mr Dmoch makes reference to there being no service diversions having been agreed. This issue was discussed with the PTE and it was noted that because services can be altered at very short notice (around 6 weeks), there was little point in agreeing diversions now which could be redundant in the future.
- 5.24 Mr Dmoch appears to ignore any direct reference to the provision of off site shuttle buses which are to be provided but does criticise the use of such services to provide pick up and drop off to local rail stations, although I note he appears to avoid reference to Metrolink which is a high frequency service linked to central Manchester.
- 5.25 As described within the 2004 TA and within my main proof, I should highlight that these proposals were originally suggested to me by the PTE as a more effective investment when I had engaged in discussions with them regarding the potential for a rail halt to the south of the SFP site. The PTE considered that the provision of

shuttle bus connections to local stations and Metrolink would provide a greater potential to encourage trips by non-car modes.

- 5.26 Mr Dmoch also makes a criticism that the on site bus priority and high occupancy vehicle measures do not go far enough, with the suggestion that the SFP proposals should be funding non-specified off site facilities also in order to provide the 'level of promotion required for high occupancy vehicles'.
- 5.27 Whilst this reference again highlights Mr Dmoch's approach to his review - that it is not what we are providing that is important but what we are not providing - I am unclear as to what he means by the required level of promotion for high occupancy vehicles. What is the required level and by whom is it required? The PTE nor any of the highway authorities have suggested there is anything further we should be providing.
- 5.28 Finally, Mr Dmoch makes what he calls a summary point, although I think perhaps this is a supplementary point which does not fall within any of the categories Mr Dmoch has attempted to criticise.
- 5.29 He suggests that there has been difficulty in obtaining a comprehensive set of documents and that the Appellant has somehow prejudiced RAGE's ability to provide a comprehensive analysis.
- 5.30 I should highlight that I have never been asked for any documents, information or even clarification by anyone who now represents or has previously represented RAGE. Furthermore, the application was made in 2004 so RAGE has had plenty of time to prepare its own analysis if it had wanted to.

## 6.0 SUMMARY AND CONCLUSIONS

- 6.1 I have read the evidence submitted which objects to the proposals on transport grounds. I have not sought to address all of the points made by objectors within this rebuttal proof but clearly many are the result of misunderstanding of the proposals and the assessment work undertaken.
- 6.2 There are also several references to suggest the calculations and assessments I have undertaken during the lengthy period during which this proposal has been extensively considered are flawed.
- 6.3 Despite these suggestions and despite having several years to prove otherwise, no evidence has been submitted which demonstrates that the proposals would result in harm.
- 6.4 Furthermore, none of the highway authorities who have carried out detailed reviews of the assessment work and calculations during this lengthy period has concluded that the proposals would result in harm.