

- 1. The Lincolnshire County Council (A15 Lincoln Eastern Bypass)  
(Classified Road) (Side Roads) Order 2014**
- 2. The Lincolnshire County Council (A15 Lincoln Eastern Bypass)  
Compulsory Purchase Order 2014**
- 3. Application In Relation To Proposed Compulsory Purchase Of  
Land Held By The Canal & River Trust**

**Department for Transport Reference: NATTRAN/EM/LAO/0084**

**Response to Objector's Proof**

**Mr Walton**

## Response from Lincolnshire County Council to letter/proof of evidence from Mr Walton

### 1 Issues Raised by Mr Walton

- Reasons for the removal of the Hawthorn Road overbridge from the scheme
- Lack of provision of reasonably convenient alternative routes
- Road Safety Accident Data
- Incidents on Alternative Routes
- Increases in emissions and fuel costs associated with alternative routes
- Inconvenience to the public
- Scheme costs
- Support for keeping Hawthorn Road by County/District/Parish Councillors

### 2 Response from LCC

#### 2.1 Removal of Hawthorn Road overbridge from the scheme

2.1.1 The County Council does not accept that the main reason for the removal of the Hawthorn Road over bridge was cost alone.

2.1.2 Mr Walton stated that *"It is clear from the LCC design considerations document, that the main reason for the removal of this over-bridge is due to cost"*.

2.1.3 The current single carriageway design is a different scheme than the previous dual carriageway proposal and as such it was appropriate for the County Council to review all aspects of the design, With due regard to protecting public finances, cost formed one of the aspects considered, but other issues such as safety, environment and convenience for users were also taken into account.

2.1.4 The full quote from the design considerations document is *"The dual carriageway design proposed an over bridge carrying Hawthorn Road over the bypass, however this is not considered to be required as alternative routes are available to those travelling east-west on this road which make construction of the bridge not cost effective".* In this context, "cost effective" means taking account of not only cost but also the benefits and disbenefits of an action. It is clear that cost was one of the considerations but the availability of alternative routes was also considered as part of the removal of the overbridge from the design.

#### 2.2 Reasonably convenient alternative routes

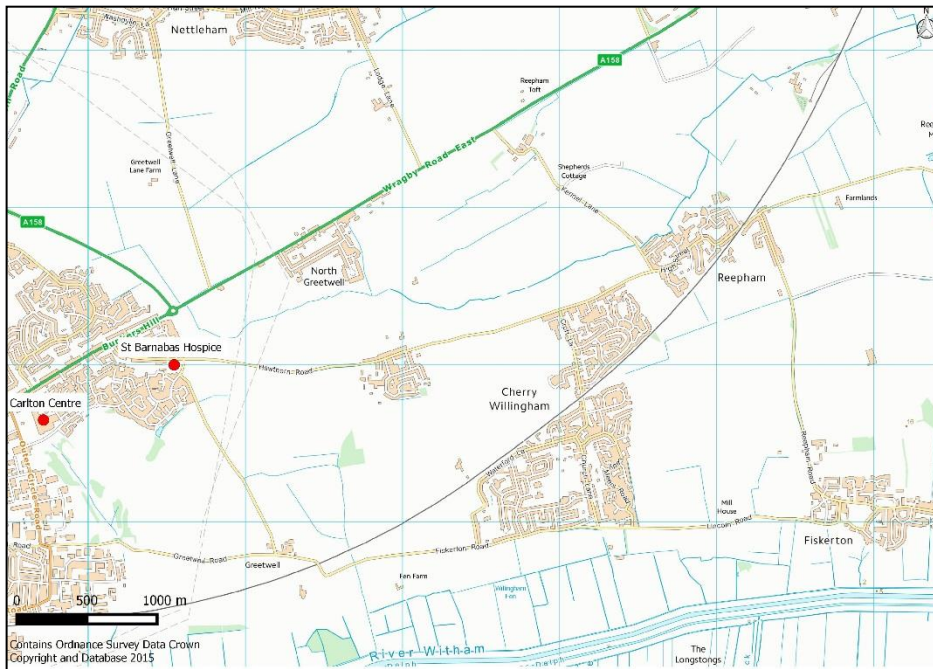
2.2.1 The County Council maintains that there will be reasonably convenient alternative routes available for all road users when the Scheme is in place.

2.2.2 In paragraph 2.8 of his proof, Mr Walton states that the inspector of the 2014 public inquiry and the Secretary of State declined to approve the previous CPO and SRO as

the statutory test that requires another reasonably convenient alternative route shall be provided prior to stopping up had not been met. However, the Inspector concluded in the resulting report that *“The indication is that reasonably convenient alternatives would be available for people travelling by motor vehicle. In addition, there probably would be journeys that would be little affected in time or distance or see an improvement. There is no evidence that the stopping up proposal would have an adverse effect on scheduled regular bus services.”* Furthermore, the Inspector later concluded that *“On balance, I conclude that for people travelling by motor vehicle reasonably convenient routes will be available or will be provided to compensate for the proposed stopping up of Hawthorn Road.”* It can be seen that, contrary to Mr Walton’s inference, the inspector concluded that there would be reasonably convenient alternative routes, and in fact the reason for the CPO and SRO not being approved solely related to Non-Motorised Users and the location of a pedestrian crossing of Hawthorn Road.

- 2.2.3 The County Council agrees that with the Scheme in place, some journey at certain times of the day will be longer and will take more time, however, other journeys will be shorter and quicker. The County Council maintains that the alternative routes available will be reasonably convenient and considers Mr Walton’s analysis of the alternative routes to be flawed for the reasons set out below.
- 2.2.4 Mr Walton discusses possible alternative routes between communities/villages to the east and west of the LEB in his paragraphs 3.1 to 3.12 but limits his analysis to one specific destination. He identifies the Carlton Centre as a key destination as it provides a range of *“conveniences, health care, banks and services, etc”* and that access to these from the east of LEB will be severed when Hawthorn Road is stopped up. He goes on to identify a number of alternative routes, using different combinations of roads, between the Carlton Centre and Reepham/Cherry Willingham. However, instead of using the Carlton Centre as one end of the routes for his analysis, he has used the St Barnabas Lincolnshire Hospice Day Therapy Centre on Hawthorn Road. He notes that he has used St Barnabas as a reference point and that there are many other points that could be used and the difference in distance is negligible. However, as shown on Figure 1, St Barnabas Hospice is not located at the Carlton Centre and the distance between these locations is 1.3km which is significant when put in the context of the journeys Mr Walton has identified in his calculations, ranging between 3.7km and 8.33km. Furthermore, St Barnabas is more significantly affected by the partial closure of Hawthorn Road than the Carlton Centre with, in a number of cases, the alternative routes being proportionately longer than they would be to the Carlton Centre.
- 2.2.5 Lastly, many more journeys will be made by residents of Reepham and Cherry Willingham to other destinations, including the Carlton Centre, than to St Barnabas and the use of the route to/from St Barnabas cannot therefore be said to be a typical daily journey of those residents.

Figure 1 – Locations of Carlton Centre and St Barnabas



- 2.2.6 In addition, the calculations in Mr Walton’s Tables 1 and 2 only show journey times and distances westbound from Reepham and Cherry Willingham to St Barnabas and do not identify those for journeys in the opposite direction, some of which could use the LEB. This is also misleading as journeys eastbound towards the villages using LEB will in many cases be shorter than the equivalent journeys heading towards St Barnabas.
- 2.2.7 In summary, Mr Walton’s evidence purports to consider one destination, the Carlton Centre, although his calculations are based on another, less significant location, St Barnabas, which is in a very different location, and he has presented data which ignores probably the shortest and quickest option for those travelling in an easterly direction.
- 2.2.8 Mr Walton states that his calculations of distances and times are based on Google maps and “estimates”. This is in contrast to data used by the County Council to compare alternative distances and times which is derived from properly conducted journey time surveys and a well validated traffic model.
- 2.2.9 In addition, Mr Walton gives no consideration to other more major destinations that residents of Reepham and Cherry Willingham may visit on a frequent basis. The development of the bypass is likely to improve access and journey times to a range of important destinations, as cited in Dr Billington’s evidence, and this is ignored by Mr Walton. The following table is taken from Dr Billington’s evidence and his evidence states *“For some local trips it can be seen that journey times are expected to increase at certain times of the day, with the greatest increase of five minutes expected to be between Cherry Willingham and the Carlton estate in the morning peak. However, for some trips slightly further afield, for example to and from the city centre and the railway station, there will be improvements in journey times.”*

Table 1 – Journey Times between Pairs of Trip Origins and Destinations

Origin	Destination	Change in Journey Time (Minutes) in Scheme Opening Year		
		AM Peak	Inter-peak	PM Peak
Cherry Willingham	Railway Station	-02:03	-05:53	-08:02
Cherry Willingham	Wragby Road Tesco	+02:28	+00:22	-00:27
Cherry Willingham	Carlton Estate	+05:00	+02:57	+02:44
Cherry Willingham	City Centre	-01:58	-00:31	-02:21
Cherry Willingham	Fire and Rescue Station	-03:37	-07:28	-09:30
Cherry Willingham	Lincoln County Hospital	+02:20	+00:36	+00:05
Railway Station	Cherry Willingham	-05:05	-02:14	+01:00
Wragby Road Tesco	Cherry Willingham	-00:05	-00:06	+00:18
Carlton Estate	Cherry Willingham	+01:20	+01:33	+01:30
City Centre	Cherry Willingham	-02:40	-00:23	-03:52
Fire and Rescue Station	Cherry Willingham	-06:22	-03:07	-00:51
Lincoln County Hospital	Cherry Willingham	+00:04	+00:22	-00:08
Reepham	Railway Station	-04:01	-06:30	-06:36
Reepham	Wragby Road Tesco	+00:50	+00:33	+00:03
Reepham	Carlton Estate	+01:05	+03:12	+03:12
Reepham	City Centre	-04:19	-01:50	-02:43
Reepham	Fire and Rescue Station	-05:50	-08:06	-08:04
Reepham	Lincoln County Hospital	+01:08	+00:03	-00:16
Railway Station	Reepham	-03:42	-01:33	+01:21
Wragby Road Tesco	Reepham	-00:02	-00:05	-00:16
Carlton Estate	Reepham	+01:23	+01:34	+01:30
City Centre	Reepham	-03:01	+00:04	-03:14
Fire and Rescue Station	Reepham	-05:17	-02:26	-00:34
Lincoln County Hospital	Reepham	+00:11	+00:24	-01:28

2.2.10 In paragraph 3.12 Mr Walton acknowledges that the junction of Hawthorn Road and the A15 Bunkers Hill can be difficult to negotiate and he provides a photograph (Picture 1) showing queuing at the junction. He then suggests that conditions will be worse at this junction in summer. With the implementation of the LEB and the partial closure of Hawthorn Road to the west of LEB, less traffic will use Hawthorn Road and consequently the operation of its junction with the A15 Bunkers Hill will improve. In addition, although the major road flows may be higher in summer, it is likely that the side road flows will be lower, for the reasons given below.

2.2.11 In his paragraphs 3.13 to 3.16 Mr Walton discusses seasonality of traffic, particularly on the A158 and identifies that Dr Billington's evidence from the 2014 Public Inquiry do not consider seasonal traffic. It is agreed that the traffic modelling does not reflect seasonal peaks in traffic, nor does it reflect times when traffic levels will be lower

than average. The model uses the industry standard approach, as required by the Department for Transport for scheme assessment, of adopting a neutral month to reflect 'normal' non-seasonal conditions that drivers would expect to experience for the majority of the year.

- 2.2.12 It should be noted that summer seasonal peaks in traffic flows only occur on certain routes while flow levels on most local roads are generally lower than in neutral months as children are not attending school and many people are on holiday and hence not driving on their normal routes during peak periods. Thus, it is not the case that summer traffic flows will be higher on all roads as implied by Mr Walton, and so using a neutral month is the appropriate approach.
- 2.2.13 In his paragraph 3.17, Mr Walton states that the LEB roundabout with Greetwell Road will increase journey times. The County Council accepts that with the Scheme in place traffic using Greetwell Road as an alternative route will need to negotiate the roundabout with LEB. However, the future performance of the junction has been tested using the industry standard software ARCADY and this has shown that the roundabout will perform well within capacity. Delays for traffic approaching the roundabout on all arms in the AM peak period in the design year, 2033, will be minimal and on both Greetwell Road approaches will be less than 10 seconds.

### **2.3 Road Safety Accident Data**

- 2.3.1 The County Council maintains that there will be no significant change in safety risk for drivers using available alternative routes with the Scheme in place. The Lincolnshire Road Safety Partnership continually monitors the historic accident record of roads in the county and no sections of road or junctions on the alternative routes have been identified as being of concern.
- 2.3.2 Mr Walton states at the beginning of his evidence that the safety of the roads is a new issue before this inquiry *“as the accident statistics of the alternative routes were not analysed in depth and has taken into account the new traffic counts carried out by the LCC in 2015.”* However, the analysis of the safety aspects of a new highway scheme, including consideration of historic accident data, forms a fundamental part of the justification of a scheme and in this case was included in the Best and Final Bid Business Case submitted to DfT in 2011. In addition, Dr Billington's proof of evidence for the 2014 Public Inquiry included analysis of the historic accident records of the roads that comprise the alternative routes and this was a topic of discussion during the Inquiry.
- 2.3.3 The Inspector at the 2014 Inquiry was aware of the historic accident record of roads in the area, including the alternative routes and in her report she stated: *“Examination of the evidence leads me to conclude that several safe alternative routes exist or would be provided as a result of the Scheme”.*
- 2.3.4 In Section 4 of his proof of evidence, Mr Walton has undertaken a comparative analysis of the safety records of Hawthorn Road and the alternative routes he has identified. The source of accident data is Crashmap which uses publically available information released by the Department of Transport and is based on police records entered into the Stats19 database.

- 2.3.5 Mr Walton starts his analysis by using a total number of accidents on each route using a rolling three-year average between 2005 and 2013. This is contrary to the advice of both DfT and Royal Society for the Prevention of Accidents which recommend using the most recent 3 to 5 full years of data.
- 2.3.6 The DfT guidance provided in the COBALT user manual (Appendix A), when specifying the use of historic data to calculate accident rates, states, *“Data to calculate local accident rates can be obtained from the appropriate police or local authority and should relate to a period when conditions on the road have been broadly unchanged (for example, no abnormal changes in traffic flow, no changes in junction design or road geometry, etc)”* and also *“the observed numbers of accidents on a given link for consecutive years should be entered..... Data for a maximum of 5 consecutive years can be used”*.
- 2.3.7 The RoSPA Road Safety Engineering Design Manual (Appendix B) (Section 4 – Investigating and defining accident problems, paragraph 4.1.1. investigation levels) states that *“...it is import to try to define an investigation level, that is, the number of accidents at which further investigation is carried out. An investigation level should be set against three factors:*
- *The number of and/or type of accidents*
  - *A length of area of highway*
  - *A time period – usually three to five years.”*
- 2.3.8 Mr Walton’s use of accident data over a period from 2005 to 2013 may lead to the analysis not reflecting current conditions on the highway network in terms of the condition of the roads themselves but also the vehicles and road users on them. Over such a long period, the road network may have changed in a number of ways including, but not limited to, geometry, surfacing, signing, NMU facilities, etc, which may have reduced the risk and/or severity of accidents. In terms of the vehicles, significant improvements to safety features and roadworthiness will have occurred through, for example, the wider adoption of the Electronic Stability Programme (ESP) on new vehicles and the Government’s Scrappage Scheme, which removed a significant number of older vehicles from the network. A significant proportion of the information used by Mr Walton is now over five years old and should be disregarded.
- 2.3.9 In contrast, in his evidence, Dr Billington has used the most recent five full years’ worth (2010 to 2014) of accident data and this should be considered as the most appropriate base for comparing road safety.
- 2.3.10 In line with practice recommended by DfT, when considering historic accident rates on routes it is essential to take into consideration the length of road considered and the level of traffic flow in order to present a true picture of the safety risk associated with each route. For this reason, much of Mr Walton’s analysis of historic accident data, which considers only numbers of accidents or accidents per kilometre of road, is of no value for comparing the level of risk associated with the various alternative routes. Mr Walton acknowledges this in para 4.18 of his proof, stating *“The analysis so far in this report assesses only the accidents per route, to ensure that the routes are evaluated thoroughly, the safety of the routes needs to assess also the number of vehicles that travel on these roads and on the alternative routes to Hawthorn Road”*

- 2.3.11 In para 4.20 and graphs 3 to 8 Mr Walton does show some analysis based on the recommended method using accidents per million vehicle kilometres, however this analysis still uses a rolling 3 year average (the most recent of which is for 2011 to 2013) rather than the standard 3 or 5 year period, and is also based only on roads leading to St Barnabas Hospice. Mr Walton also presents no information regarding the severity of accidents recorded in the period under consideration.
- 2.3.12 Mr Walton does not provide the numbers behind Graph 3 & 4 associated with paragraph 4.20 which discusses incidents per million vehicle kilometres. It is therefore difficult to fully understand and therefore comment on the figures and calculations behind these graphs fully.
- 2.3.13 In paragraph 4.7.7, Mr Walton states that his calculated accident rates are an underestimate as no data is available for the LEB and the Hawthorn Road and Greetwell Road junctions and that LEB will increase the number of accidents. However, DfT guidance indicates that new roads designed to modern standards will be safer than older roads and hence,, due to its higher standard, accident rates should be lower on the LEB than the surrounding highway network. The junctions on the LEB have been designed to current standards and have been safety audited, therefore, accident risks will be minimised.
- 2.3.14 In Section 5 of his proof of evidence, Mr Walton discusses relative costs associated with accidents on Hawthorn Road and the alternative routes. Mr Walton again uses data that is now up to 10 years old and, as noted above, this may not reflect current conditions on the road network and does not take account of improvements in vehicular safety. A large proportion of the data used by Mr Walton therefore should be disregarded. . This analysis is simply based on multiplying accident numbers by average costs and, as set out above, provides no insight at all into the relative safety risk associated with each alternative route as it takes no account of route length, traffic flows, the nature of the routes or the severity of accidents. This analysis should therefore be disregarded.
- 2.3.15 For the various reasons set out above, Mr Walton's analysis of the historic accident data and his conclusions related to this are flawed.
- 2.3.16 In contrast, Dr Billington's evidence presents the results of analysis for the most recent five full years of accident data (2010-2014 inclusive), producing figures for accidents per million vehicle kilometres. The evidence presents this information for the currently available route along the Hawthorn Road between Cherry Willingham and Outer Circle Road as well as two alternative routes from Cherry Willingham and Outer Circle Road via Wragby Road and Greetwell Road. The findings of this analysis show that the accident rate for the five years analysed, is lowest on the Greetwell Road route (0.440 accidents per million veh/km), with the Kennel Lane/Wragby Road route having a rate of 0.490 and the existing Hawthorn Road/Carlton Boulevard route having a rate of 0.492. There were no fatal and very few serious accidents on these routes over the five year period. In conclusion, there is nothing in the analysis of the historic data which indicates that the alternatives to Hawthorn Road are inherently less safe either in terms of the risk of being involved in an accident or in likely severity of accidents. This analysis is supported by the



conclusions of the Lincolnshire Road Safety Partnership and of the Inspector at the 2014 Inquiry (referenced above).

## **2.4 Incidents on Alternative Routes**

- 2.4.1 The County Council does not accept that the occurrence of “incidents” reported by Mr Walton indicates that the alternative routes are not convenient or safe. The number of incidents is related to the level of use and does not reflect any inherent characteristic of the route.
- 2.4.2 Although Section 6 of Mr Walton’s proof of evidence is headed “Incidents during 2014 and 2015”, he uses both historic accident data from a much longer period and reports of more recent incidents to draw a comparison between alternative routes.
- 2.4.3 Dealing with the accident data first, in para 6.11 to 6.13 and tables 5 and 6, Mr Walton shows total accident numbers on routes in the years 2005 to 2013. For the reasons given above, this analysis which includes no reference to length of road or traffic flow, nor of accident severity, offers no insight into the relative safety risk of these alternative routes. In addition, using data older than five years is contrary to good practice advice.
- 2.4.4 With regard to more recent accident data, in the appendices (Reference 18 to 31) supporting Section 6 of Mr Walton’s proof of evidence, he presents extracts from various media sources to highlight accidents that have occurred on alternative routes. Of the 14 accidents, the following comments can be made:
- Two were not on either of the alternative routes (References 19 and 20) and one appears to have occurred on or close to the Hawthorn Road/Carlton Boulevard route (Reference 30).
  - Six occurred in 2014 and will be included in the analysis presented in Dr Billington’s proof of evidence, if injuries were sustained (References 21 to 26).
  - Four (References 18, 27, 28 and 31) either occurred in 2015 or no date is provided, and limited information is known, therefore, no comment can be made.
  - Reference 29 was a vehicle fire, which has no relevance to relative road safety
- 2.4.5 Furthermore, none of the media-sourced information related to accidents provided by Mr Walton in his appendix indicates specific safety issues on the roads in question.
- 2.4.6 With regard to “incidents”: the official police records of road traffic collisions include details of incidents which result in personal injury accidents and provide details of the location, severity, causal factors etc and so provide a robust basis for assessing the safety risk on a section of highway. Collisions or other incidents which do not result in personal injury are not reported to the police and so do not appear in official statistics. Some incidents are observed and reported anecdotally, while others are not and it is impossible to say with any accuracy how many incidents, and of what nature, occur on any given road over any given period. It is therefore impossible to base any meaningful comparison on “incidents” which are reported in news media.

- 2.4.7 In paragraphs 6.4 to 6.5, Mr Walton provides details of two incidents involving a diesel spillage on Greetwell Road and a vehicle fire. Both of these incidents were related to the vehicles involved and not imply any inherent safety risk associated with the roads. These incidents could have occurred anywhere on the vehicles' journeys and do not indicate that there are safety issues on the local roads.
- 2.4.8 Mr Walton also makes reference to Hawthorn Road being used as a diversion route during the oil spillage incident and, of course, with the Scheme in place, this would remain the case with Hawthorn Road providing access to LEB.
- 2.4.9 In paragraph 6.7, Mr Walton states that the *"risks associated with Greetwell/Fiskerton Road due [sic] the bendiness and the difference in elevations means, travelling on this road places drivers and their occupants at greater risk and danger, than that of Hawthorn Road."* There is no evidence in the analysis of historic accident data to support this statement and the North Division Area Highways Manager for LCC, Alan Brown has stated: *"Neither Kennel Lane or Fiskerton Road/Greetwell Road are identified as being in need of realignment and are not untypical of Lincolnshire's road network. They are perfectly safe to use"*.
- 2.4.10 In addition, Mr Chetwynd's proof of evidence provides commentary on an analysis of the highway geometry of the alternative routes and concludes that *"The summary conclusion from this exercise is that the routes are all of a comparable quality with little variance...between the stopped up route and the alternatives as well as the comparative routes to the South. The routes are therefore assessed as being representative of typical roads in Lincolnshire."*
- 2.4.11 In paragraph 6.8, Mr Walton highlights a newspaper article from the Lincolnshire Echo (Reference 38) from June 2015 which identifies the *"top 10 most dangerous roads in Lincolnshire"*. The information was released by Lincolnshire Road Safety Partnership to help influence driver behaviour with regard to being patient and leaving sufficient time for journeys. The data presented shows the 'top 10' Lincolnshire roads with the highest number of fatal/seriously injured casualties and the highest number of all casualties; the A158 is listed in 6<sup>th</sup> and 5<sup>th</sup> places respectively. The section of the A158 included in the lists stretches from Lincoln to Skegness, a distance of over 64km, only 2.3km of which will be part of one of the alternative routes to Hawthorn Road. The information presented is a very simple analysis of total numbers of casualties and makes no attempt to robustly assess the relative safety of each road taking account of road length and traffic flows. Based on relatively short section of the A158 that will form part of an alternative route and the limited nature of the analysis presented, it is inappropriate to use such analysis as an indication of the relative safety of the alternative routes.
- 2.4.12 In summary, Mr Walton's analysis of "Incidents" is flawed as it is based on inappropriate use of historic accident data and unsupported assertions regarding the causes of incidents. It provides no useful information regarding the convenience or safety of alternative routes.

## **2.5 Emissions and fuel costs associated with alternative routes**

- 2.5.1 The County Council accepts that with the scheme in place, some journeys will be longer and take more time, but many more, including from Cherry Willingham and

Reepham, will be shorter and quicker. Consequently, it is agreed that for a limited number of journeys, fuel costs and emissions will be higher but that for many more journeys they will be lower. The analysis of the impacts of the scheme undertaken using DfT required procedures, shows that overall there will be significant reductions in emissions and fuel costs for existing traffic.

- 2.5.2 In his proof, Mr Walton has attempted to calculate the increase in emissions and travel costs associated with the alternative routes once Hawthorn Road has been stopped up. However, the scope of his calculations is very limited as he considers only traffic currently using Hawthorn Road. In addition, Mr Walton’s analysis is also flawed as he considers that all of the traffic on Hawthorn Road is travelling between Cherry Willingham/Reepham and St Barnabas whereas most of the traffic from the villages will be to and from other destinations.
- 2.5.3 The basis for Mr Walton’s calculations is that all traffic heading west on Hawthorn Road and turning south into St Augustine Road and traffic heading north on St Augustine Road and turning east onto Hawthorn Road will be travelling between Cherry Willingham/Reepham and St Barnabas. In reality, this traffic will have a significant range of origins and destinations and choosing this limited proxy is very misleading and it is not appropriate to calculate carbon emissions and fuel costs in this way.
- 2.5.4 For the reasons above, Mr Walton’s analysis is limited and flawed.
- 2.5.5 The DfT assessment program TUBA has been used to assess the overall impact of the Scheme on vehicle costs and Carbon emissions for all traffic movements in the study area and Table 3 below shows the results of this analysis.

*Table 3 – Value of Benefits from LEB – Vehicle Cost Savings and Carbon*

Saving Area	Value of benefits
<b>Vehicle Cost Savings</b>	£89,486,000
<b>Carbon</b>	£11,740,000
(NB values are discounted over 60 year evaluation period)	

2.5.6 It can be seen that the Scheme will result in significant savings in vehicle costs (including fuel and other operating costs) in the order of £89 million and savings in carbon emissions in the order of £12 million across the whole study area.

## **2.6 Inconvenience to the public**

- 2.6.1 The County Council does not accept that overall the Scheme will result in inconvenience to the public.
- 2.6.2 In Section 8 of his proof of evidence, Mr Walton comments on the inconvenience that the partial closure of Hawthorn Road would bring to local communities. Whilst some journeys will indeed be longer, the Scheme will also bring benefits to communities with some journeys being quicker. Whilst accessing some local shops and services may take longer, the Scheme will make other shops and services more accessible through reduced congestion and new route choices. Journeys to Lincoln city centre and the railway station, for example, will be quicker once the Scheme is in place. In

addition, the response times for emergency vehicles will be reduced and the bus operators have welcomed the Scheme and envisage little or no disruption to services.

2.6.3 Cherry Willingham has a range of local shops and services including doctors' surgery, library, post office, two pubs, hair salons, pharmacy, newsagent, hot food outlets, butcher and a small supermarket. In addition, Reepham has a post office and pub. If, as Mr Walton suggests, accessing shops and services to the west of LEB were to become problematical for some members of the community this may encourage greater support for facilities within the villages. In the longer term this could lead to an increase in demand resulting in growth of the local economy. Furthermore, planned growth in housing in the area may generate additional demand for existing facilities in the villages, and also may provide new facilities, improving access to shops and services locally.

2.6.4 In paragraph 8.10 of his evidence, Mr Walton states that *'It may seem to some that this is acceptable, however it is not, innocent Children who cannot begin to understand or fight for their rights should not be put at a greater danger or increased safety risk when it is completely unnecessary'*. This statement is based on Mr Walton's suggestion that the alternative routes are less safe, however, for the various reasons given above, there is no evidence to support this suggestion. Furthermore, as highlighted in Dr Billington's evidence, Mr David Robinson, the Schools Services Manager from the Children's Services Directorate of the County Council believes that the LEB *"could positively contribute to parental choices in schools in the following ways:*

1. *by providing a new route between centres of population and schools which are currently significantly disconnected (eg Washingborough, Heighington and Branston to the south of the River Witham and the settlements to the north of the river ), and;*
2. *by reducing journey times on a large number of roads across the greater Lincoln area and thus making it easier to travel between home and a greater number of schools".*

2.6.5 In paragraphs 8.11 to 8.13, Mr Walton comments on increased costs and pollution generated by the scheme. However, as demonstrated above, residents of Cherry Willingham and Reepham will, on average, have small increases in journey times and distances in the AM peak period but benefit from significantly greater reductions in journey times and distances in the inter-peak and PM peak periods. Overall, the public will benefit greatly from reduced journey times, fuel cost and emissions.

2.6.6 In paragraph 8.15 of his proof of evidence, Mr Walton comments on potential impacts of the Scheme on the elderly. As demonstrated in Dr Billington's proof of evidence, reasonably convenient alternative and safe routes will be available following the opening of the Scheme and this was also supported by the Inspector at the 2014 public inquiry. Dr Billington also highlights in his evidence that bus services to the villages of Cherry Willingham and Reepham will not be adversely affected by the Scheme and this is supported by views provided by bus operators.

## **2.7 Scheme Costs**

2.7.1 In paragraph 8.24 of Mr Walton's proof of evidence, he states that the overall project cost has reduced from £95,858,000 (paragraph 3.56 in Inspector's report for the 2014 Public Inquiry – Core Document 1) to £82,806,310 (Table 7-2 in the Forecast and Economic Evaluation Update Note – Core Document 84); this is not the case. The two figures quoted by Mr Walton have been calculated on a different basis and the equivalent cost to that include in the Inspector's report for the 2014 Public Inquiry is £96,304,000. The £82,806,310 quoted from the Forecast Economic Evaluation Update Note excludes optimism bias, inflation, taxation and adjustment back to 2010 prices.

## **2.8 Support for keeping Hawthorn Road by County/District/Parish Councillors**

2.8.1 In paragraph 8.25 of Mr Walton's proof of evidence, he states that a petition to demonstrate support for keeping Hawthorn Road open, signed by local MPs and County/District/Parish Councillors, was presented to the Minister of Transport on the 15th December 2014. He also states that "*A geographical map showing the areas/wards in support of keeping Hawthorn Road open is included in Reference [33] of the appendix*". However, the note attached to this map states "*Petition signed by one or more Councillors*".

2.8.2 It is difficult to ascribe any significance to this since one Councillor in a ward signing a petition cannot be considered to represent the views of the area/ward. In addition, it is not explained how signatures were obtained nor how many Councillors were approached and opted not to sign.

## **3 Responses to Questions to Dr Billington from Mr Walton**

3.1 These responses will be provided to the Inquiry in a separate document.

## Appendix A – DfT COBALT User Manual

## **Appendix B – RoSPA Road Safety Engineering Design Manual**