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Endeavour House  
Stansted Airport

26th September 2007

Before:

Alan Boyland, Lead Inspector  
Terry Phillimore, Assismand Inspector

BAA Public Inquiry - Stansted Airport

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Mr M Humphries QC and Mr H Philpot (instructed by CMS  
Cameron McKenna) appeared on behalf of BAA Ltd and Stansted  
Airport Ltd.  
Mr P Stinchcombe and Ms S Hannett (instructed by Jameson and  
Hill Solicitors) appeared on behalf of Stop Stansted  
Expansion.  
Mr T Hill and Ms L Busch (instructed by the Councils)  
appeared on behalf of Uttlesford District Council, East  
Hertfordshire District Council, Essex County Council and  
Herfordshire County Council.

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STANSTED AIRPORT  
G1 PUBLIC INQUIRY

held at  
Endeavour House  
Stansted Airport

on Wednesday, 26th September 2007  
commencing at 10.00 am

APPEARANCES

1

2

3 MR ALAN BOYLAND, Inspector

4 MR TERRY PHILLIMORE, Inspector

5 MR MICHAEL HUMPHRIES, QC, BAA

6 MR THOMAS HILL and MS LISA BUSCH, Uttlesford District

7 Council, Essex County Council and Hertfordshire County

8 Council

9 MR PAUL STINCHCOMBE and MS SARAH HANNETT, Stop Stansted

10 Expansion

11 MR KEITH TURNER, National Trust

12 MS MICHELE HATWELL, Uttlesford District Council

13 Communication

14 DR PAT ELLIOTT, Saffron Walden District Friends of the Earth

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1 Wednesday, 26th September 2007

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MR TERRY WANG (cont.)

4

Re-examination by MR HILL

5

MR PHILLIMORE: Good morning, everybody. The Inquiry is now

6

resumed. I just remind everybody to make sure mobile

7

phones are switched off and turned to silent and also to

8

sign the attendance list, please.

9

Before we continue with the re-examination of

10

Mr Wang by Mr Hill, is there anything else of

11

a procedural nature that anyone wants to raise? Okay.

12

Mr Hill.

13

MR HILL: Thank you very much indeed, sir. I will just move

14

this microphone slightly closer to me. Good morning,

15

Mr Wang.

16

A. Good morning.

17

Q. One or two matters of clarification, please, arising

18

from your cross-examination yesterday. I am going to

19

take those matters in the order in which they arose in

20

the cross-examination. Cast your mind back to yesterday

21

afternoon for that. Can we start, please, with the

22

issue of the transfer percentage being assumed in the

23

modelling work and the advice received from SH&E. You

24

recall you were asked about that and indeed in your

25

evidence-in-chief you drew the Inquiry's attention to

1 the letter that UDC wrote to BAA in July on this  
2 subject. I think that went in as appendix G to ECC/1/H.  
3 Have you got that to hand?

4 A. I don't have appendix G itself.

5 Q. The loose-leaf that was floating around and which  
6 I perhaps optimistically thought had been inserted into  
7 1/H without being detached. Why don't you borrow my  
8 copy?

9 A. Thank you.

10 Q. Which is unmarked other than the annotation in appendix  
11 G. Just cast your eye over that. Now my question is  
12 simply this: so far as you are aware were SH&E consulted  
13 before UDC sought to modify their position on this  
14 matter?

15 A. Not that I am aware of, no.

16 Q. Can you read the last part of the letter?

17 A. "I have discussed this approach with Richard Holt of  
18 SH&E and he agrees that is a reasonable approach."

19 Q. So what does that suggest to you about any contact  
20 between UDC and SH&E?

21 A. Well, essentially this suggests that UDC has approached  
22 SH&E on the matter and SH&E has agreed that the approach  
23 of reducing the transfer, passenger transfer and  
24 assuming a 10% transfer of passengers for the 35 MPPA  
25 case is a credible approach.

1 Q. Very well. Thank you. Can I have my copy back now?  
2 I don't want another one to disappear into the ether.

3 A. Sorry. Thank you.

4 Q. We can move on then, please, to another entirely  
5 separate matter. That is really just a matter of  
6 clarification about the questions you were asked on the  
7 CD/274. Have you got that? That's the Essex County  
8 Council cabinet report.

9 A. Yes, I have.

10 Q. Of 19th September 2006, which has a covering letter  
11 attached to it of 4th October 2006. This matter deals  
12 with a series of issues arising from G1 under various  
13 heads. Just turn through the cabinet report. Page 4 we  
14 have air traffic forecast, section 3. Section 4,  
15 passengers, 5, noise and air quality, then 6, back to  
16 surface access matters, and then 7 is employment and  
17 economic impact, 8 is waste and we have climate change  
18 and other matters. The conclusions are set out in  
19 section 13. You were asked about paragraph 13.1 amongst  
20 other paragraphs. That contains, as we can see, some  
21 generalised conclusions. Does your brief, Mr Wang, for  
22 Essex County Council extend to the consideration of and  
23 provision of advice beyond highways and transportation  
24 matters or is it confined to highways and transportation  
25 matters?

1 A. It is confined to highways and transportation matters.

2 Q. Good.

3 A. And on surface access issues.

4 Q. Thank you. You can put that away now. I don't think we

5 need to come back to that document. Then another

6 entirely separate matter. This is model validation.

7 You were asked about that. There was a whole series of

8 modelling exercises that BAA have undertaken. You were

9 asked about validation. You agreed that the models

10 validated well for the base year data. Do you remember

11 that?

12 A. Yes.

13 Q. You indicated that your concerns were with the

14 forecasting?

15 A. That is correct, yes.

16 Q. Now the base year is, as you reminded us, 2003?

17 A. Yes, the base year of models are.

18 Q. Which is -- I think I can lead you -- four years ago.

19 How well have the models validated for any year post

20 2003 where you have had access to the data?

21 A. If I can just lead to a document ECC/1/H, to that

22 document, and go to appendix B.

23 MR HUMPHRIES: Sir, let us raise a point on this. It is

24 accepted in the statement of common ground that the

25 models are appropriate and fit for purpose. They have

1           been signed off as fit for purpose. Mr Wang accepted in  
2           cross-examination that they were fit for purpose. If he  
3           had then said to me, "No, they are not actually fit for  
4           purpose because I want to look at some other data",  
5           I would have cross-examined him on that. You know, one  
6           has to proceed on the basis of what we have in the  
7           statement of common ground and the questions that I have  
8           had. The tenor of the cross-examination was that the  
9           models validated for the base year against which they  
10          have been validated -- they are only validated against  
11          one year and that's 2003 -- can't be validated for the  
12          future, of course, because the future hasn't happened.  
13          You can't validate something for 2014 until you get to  
14          2014. I am concerned if what is now going to be  
15          attempted is an effort to undermine the validation of  
16          the models, because that is, as I understand it, agreed.

17       MR HILL: Let us hear --

18       MR PHILLIMORE: Mr Hill?

19       MR HILL: Let us hear the answer. That is plainly a matter  
20          of submission, intervening in that way before Mr Wang  
21          had an opportunity to open his mouth. So I do object to  
22          that. The question is a perfectly fair one.  
23          Mr Humphries trod no further than validation in the base  
24          year, although Mr Wang's evidence before the Inquiry  
25          plainly looks beyond that and makes some important

1           comments about it. Now obviously what's in the  
2           statement --

3   MR HUMPHRIES: Sir, the reason --

4   MR HILL: Let me finish my point.

5   MR PHILLIMORE: One at a time, please. Can we hear  
6           Mr Hill's response, please?

7   MR HILL: All I am doing is drawing attention fairly to  
8           material before the Inquiry via Mr Wang, who is the  
9           witness who speaks to it. Of course the statement of  
10          common ground signed by Essex County Council is what it  
11          is. The last thing I intend to do, whatever I intend to  
12          do, would be to seek to go behind it or undermine it  
13          with my clients having signed it. That's not my  
14          purpose. This is a very, very complex area of evidence.  
15          It seems to me, sir, that you will have to take a view  
16          on all the material before you in the context of the  
17          closing submissions which you will eventually receive.  
18          Trying to sort of pick it apart by interrupting my  
19          re-examination is not going to advance matters and we  
20          are just going to end up with Inquiry time being wasted  
21          with exchanges such as this. I hope you can rely on me  
22          not to proceed in a way that's improper. I am simply  
23          seeking clarification, a question having been put to  
24          Mr Wang in a very narrow way, when there is a broader  
25          swathe of evidence before you in his evidence.

1 MR PHILLIMORE: I think I would like to hear Mr Wang's  
2 answer and then see where we go from there but,  
3 Mr Humphries, do you want to add anything at this stage?  
4 MR HUMPHRIES: The only further point I was making is, sir,  
5 you can't attempt to see whether there is validation.  
6 There is no validation for the other years. The models  
7 weren't used to predict other years. You validate  
8 against a year. You get the model to work for  
9 a particular year, in this case 2003. You look at the  
10 actual data for 2003 to see how the model validates.  
11 That's the validation.  
12 MR PHILLIMORE: I think that will be a matter for  
13 submissions once we have heard the evidence. If you put  
14 the question again, Mr Hill, because it probably got  
15 lost in that and then we can answer the answer.  
16 MR HILL: It probably has, yes.  
17 The questions put to you did not stray beyond the  
18 base year data of 2003. I am simply asking Mr Wang for  
19 your view on when one has been able to peer beyond 2003  
20 what view you formed about the performance of the model?  
21 A. I have interrogated the LMDR that was submitted for the  
22 SRTM and the words that were used was "the validation in  
23 2004 is good" in 7.9.8, page 8 of the LMDR SRTM/2, model  
24 validation report, June 2007.  
25 MR PHILLIMORE: You are losing me on the reference there.

1           You were taking us to appendix B, document ECC/1/H. Is  
2           that still your --

3    A.   Yes. It is just the background behind appendix B, as it  
4           were. All I would like to suggest is Essex County  
5           Council is right. If we go to 1 .6 of appendix B, about  
6           the third sentence from the bottom. I will just read  
7           this out:

8                    "This does suggest that ECC is right to have  
9                    concerns about the forecasting capability of the 2003  
10                   base year model in the light of the model being not even  
11                   able to produce valid flows for one year, that is 2004,  
12                   into the future around the STEX airport area."

13                   That was based on information provided, as I have  
14                   said, in the LRPM.

15   MR BOYLAND: I hesitate to interrupt you again, Mr Hill.

16           I wonder whether Mr Wang could just go a bit further and  
17           explain to us how he squares that with the agreement  
18           through the statement of common ground that the model is  
19           fit for purpose.

20   A.   Notwithstanding that, that there are issues that we are  
21           concerned with concerning forecasting, the fact that  
22           there is a scenario that accounts for 35 MPPA enhanced  
23           plus 15% allows us to accommodate some of the main  
24           concerns we have and hence allowed us to proceed on that  
25           basis and agree level contribution with BAA.

1 MR BOYLAND: Well, either the model is fit for purpose or  
2 there are concerns about it. I am not quite sure what  
3 your position is.

4 A. There are concerns, there are issues there, but what we  
5 are saying is it is sufficient -- our concerns are met  
6 sufficiently for us to progress if we base, which we  
7 have, based on the 35 MPPA enhanced plus 15% scenario  
8 forecast.

9 MR BOYLAND: Okay. Thank you.

10 MR HILL: Thank you. Now can we turn on to another matter  
11 altogether, which came some way further into the  
12 cross-examination when we were on to issues of public  
13 transport and coach travel in particular. Do you  
14 remember those questions, Mr Wang?

15 A. Yes, I do.

16 Q. There was a series of questions about how sustainable  
17 coach transport was and you answered that the roads are  
18 congested. Remember you were drawn to the National  
19 Express publicity material about how -- about the carbon  
20 footprint of coach travel, etc, etc. We looked at those  
21 points at the end of the notes. You said the roads are  
22 congested, that that doesn't take account of congestion  
23 and parking. If one had taken account of that, then the  
24 figures could be much, much higher and that the figures  
25 in the National Express press release did not qualify --

1 weren't qualified in any way at all as to duration, etc,  
2 etc.

3 Now just to put that in context for  
4 Stansted Airport, can you just help us with your  
5 experience on how congested are the roads into and out  
6 of London when one is travelling to and fro from  
7 Stansted in peak hour?

8 A. Some of my colleagues have been on the -- tried out the  
9 coaches from Stansted to London. Although there is  
10 an indicative timetable, that was never really  
11 a scheduled service as such. Compared to the train  
12 services, STEX, it is about 45, 46 minutes from Stansted  
13 to London Liverpool Street, but if you take the coaches,  
14 you could, depending on the situation on the M11 and  
15 traffic congestion problems within London, normally you  
16 could take up to two hours or even more. In the case  
17 that we have tried out, some of my colleagues, it took  
18 them well in excess of 1 hour 45 minutes or so.

19 Q. Thank you very much. Sir, can I just ask if you both  
20 have had the opportunity to sample the coach service in  
21 the peak hour?

22 MR PHILLIMORE: Not the coach, no.

23 MR HILL: Perhaps that is one more to put on the list of  
24 experiences that you can think back to when you  
25 contemplate the joys of this Inquiry.

1 A. At least you will have a seat!

2 MR HILL: Yes. Good. Can we move away now from that to the  
3 rail matters and the questions that were put to you  
4 about rail? There is a series of these, so we will take  
5 it step by step. It was put to you that through the  
6 HLOS the Secretary of State specifies the level of  
7 capacity he wants to see. Do you remember that  
8 question?

9 A. Yes, I do.

10 Q. Can we start, please, by looking back to ECC/1/B, in the  
11 context of specifying the level of capacity that the  
12 Government want to see. If we look at that appendix A,  
13 please, which is the letter from the department, from  
14 the DFT Rail of 23rd April, to which you drew our  
15 attention in chief --

16 A. I have the letter.

17 Q. We looked, I think, at the paragraph headed "Loading  
18 specification" and the sentence:

19 "G1 and G2 airport rail strategies have been based  
20 on the principle of one passenger per seat for the peak  
21 hour."

22 Next page, page 13 of the appendices. The last  
23 paragraph before the heading, "Changes to current  
24 franchise", do you see there:

25 "As I described above, the approved G1 strategy is

1 based upon one peak hour seat per peak hour passenger."

2 Now so far as you are aware, Mr Wang, and do tell us  
3 if there is something else the inspector should be aware  
4 of, so far as you are aware is that the level of  
5 capacity that DFT Rail want to see for STEX, the  
6 Stansted Express?

7 A. As far as I am aware for G1 it is one passenger per  
8 seat.

9 Q. Thank you.

10 A. Based on the letter.

11 Q. Thank you. We then went to something called option 8 in  
12 the draft RUS document, which is CD/312.

13 A. Thank you.

14 Q. Can I just invite you to retrieve that document?

15 A. I have the document. Thank you.

16 Q. We were looking at page 109, I think, for option 8. In  
17 fact, it goes over on to page 110 as well, although  
18 I think we were mostly looking at page 109. Have you  
19 had a chance to look at that, Mr Wang, what is said  
20 about option 8:

21 "Length of peak services between  
22 Cambridge/Stansted Airport and London Liverpool Street  
23 to 12 car."

24 Now, so far as you can understand is that option  
25 seeking to consider the implications of G1, the planning

1 application that's presently before the inspectors and  
2 the Secretary of State, the extra 10 million passengers  
3 per annum at the airport?

4 A. As I understand it, it is for that service, which is  
5 a mixed service, which includes the STEX plus the  
6 Cambridge service as well. So it's a combination of  
7 both. It is not exclusive for airport passengers at  
8 all. So it is really for the whole service.

9 Q. You have obviously looked at it and looked at what's on  
10 page 110. Have you been able to find any specific  
11 discussion of the requirement of 12 car trains for STEX  
12 in the peak hour periods?

13 A. No, I can't.

14 Q. Let us have a look at the passage at the bottom of  
15 page 109 that deals with -- it is under the heading  
16 "Crowding impact". Do you have that?

17 A. Yes, I have that.

18 Q. We can see:

19 "Our demand forecast indicates that this option  
20 would provide too much passenger capacity on the route  
21 north of Stansted Mountfitchet."

22 Is Essex County Council or are Essex County Council  
23 and Hertfordshire County Council concerned about  
24 capacity north of Stansted Mountfitchet?

25 A. That implies that it goes to Cambridge. We, at this

1 point in time, are really concerned with the G1  
2 application rather than that.

3 Q. Thank you. Then the balance of that sentence:

4 "But not enough further south."

5 So this option, this is 12 car lengthening, doesn't  
6 provide enough capacity further south. Now this is a 12  
7 car option. What does that say about 8 car trains  
8 further south, Stansted Mountfitchet and so on?

9 A. That in itself implies that 8 car train should be  
10 considered even now, the provision of that. 12 car  
11 trains, rather than 8 car trains, as the current 8 car  
12 trains are overcrowded already.

13 Q. Can we just look at the conclusion, which I don't think  
14 we turned to yesterday? It is on page 110. Just under  
15 that option 8. Do you see that? It is about two-thirds  
16 of the way down.

17 A. Yes, I can.

18 Q. It says:

19 "This option provides an increase of around 50% in  
20 peak passenger capacity. It is expected that the  
21 socioeconomic case for train lengthening would improve  
22 with better allocation capacity over the route which  
23 might be achievable through timetable and rolling stock  
24 optimisation."

25 To what extent does that give you confidence that

1 current and future overcrowding on STEX will be  
2 addressed in a timely fashion, Mr Wang?

3 A. Well, this assessment is for a 12 car train for the  
4 Cambridge-Stansted Airport line and the fact it will  
5 provide an increase of around 50% in the peak passenger  
6 capacity, whether through timetabling and rolling stock  
7 optimisation. Now that is -- there is no commitment on  
8 that path to, if you like, have that 12 car train at  
9 all. So I would encourage the Inquiry to again consider  
10 the proposed Grampian condition.

11 Q. Thank you. Now the next matter -- the next document  
12 I wanted you to look at was the next document that was  
13 put to you in this sequence of questions, which is  
14 CD/433.1. That's the White Paper, rail White Paper,  
15 which has attached to it at the back the HLOS. We were  
16 taken to a number of passages in that document. We  
17 looked at page 20, paragraph 1.27. Do you have that?

18 A. Yes, I do. Thank you.

19 Q. We have the first bullet point. For the period to 2014  
20 the Government has made the most robust demand forecast  
21 possible and specified levels of improvement to be  
22 delivered in safety, reliability and capacity. These  
23 are commitments.

24 Does that help with the certainty that Essex and  
25 Herts want that Stansted Express capacity will match

1 passenger throughput?

2 A. No, it is far short of that unfortunately, because what  
3 it does do, it puts it amongst all the other fund  
4 allocations and needs to be considered in terms of the  
5 ranking process as well amongst other projects, highways  
6 and rail. So, although there is that commitment, but it  
7 doesn't really ensure that it will happen.

8 Q. Then we looked at page 53 in the document and figure  
9 5.4. Now can I just ask you to take up your  
10 supplementary proof? That's ECC/1/G. I just want to  
11 see whether we are talking about the same thing here.  
12 Page 14 of the supplementary. Paragraph 3.26. Do you  
13 have that?

14 A. I have that. Thank you.

15 Q. Various points were put to you about this figure and  
16 what one should conclude from it. I mean, is this the  
17 same documentation that you are discussing in  
18 paragraph 3.26 of your proof?

19 A. Yes, it is precisely that.

20 Q. So you were aware of this when you wrote your proof?

21 A. Yes, I was.

22 Q. Then I think the last point on this document, page 140  
23 of the HLOS -- sorry -- page 141.

24 A. I have it. Thank you.

25 Q. You were taken to paragraph A8. Do you remember that?

1 A. Yes.

2 Q. "The Secretary of State's priority for investment in CP4  
3 is sure an increase in the carrying capacity of the  
4 franchised passenger railway to reflect the growth in  
5 demand and to relieve crowding."

6 Does that statement give you the assurance about  
7 timing of additional Stansted Express capacity that you  
8 seek?

9 A. No, not at all, because the timing has been left out and  
10 that's again right into the pool of other schemes as  
11 well. There needs to be a ranking and a prioritisation  
12 again of that.

13 Q. Thank you. Put that document away now. Can you now  
14 take out CD/443, which I think is the next document you  
15 were asked about? That's the one that has the heading  
16 "DFT Rail definition of PIXC"?

17 A. Yes, I have it. Thank you.

18 Q. Now that term, of course, one sees elsewhere in the  
19 evidence and it is used in the TAAU documentation,  
20 I think, isn't it?

21 A. Yes.

22 Q. We will not dwell on this. Were you aware of the  
23 concept of a PIXC before you gave your evidence  
24 yesterday?

25 A. Yes, I was.

1 Q. Do you think DFT might have been aware of it before they  
2 wrote their letter in spring of this year?

3 A. Yes, I am sure they did.

4 Q. Now the first sentence of CD/443 says:  
5 "PIXC only applies to weekday commuter trains  
6 arriving in London between ..."

7 Then it's the two peak periods, the AM and PM peak  
8 periods as they are defined. That applies to all  
9 weekday commuter services to London so far as one can  
10 see.

11 In your view, Mr Wang, is it appropriate to treat  
12 the Stansted Express as just another weekday commuter  
13 train?

14 A. Indeed not, as it provides for the people to get to  
15 London from Stansted Airport, although it is a mixed  
16 service.

17 Q. In your experience, do most weekday London commuters  
18 carry heavy suitcases?

19 A. No, they don't. Most of them have a briefcase and  
20 a cappuccino and maybe just a newspaper under their arms  
21 basically. Nothing like suitcases and kids dangling  
22 along.

23 Q. Thank you.

24 You can put that away. Just clarification really on  
25 one point. That's your answer to the question. Thank

1           you for that, but in any event can I just understand --  
2           it is this reference to 20 minutes. Do any of the peak  
3           hour Stansted Express services involve time between  
4           stops of 20 minutes or more?

5    A. Yes, it does. From Tottenham Hale -- trains departing  
6           from Tottenham Hale -- sorry. I have got the timetable,  
7           one railway timetable here, which I am sure you can all  
8           get it.

9    MR HILL: If it is not an Inquiry document. I am sure it  
10           can be made one. I don't require you to go through all  
11           those various options but the general answer to the  
12           question.

13   A. Yes, there are. Tottenham Hale to -- for example, 17.25  
14           departing from Liverpool Street station, Tottenham Hale  
15           at 17.37 and Harlow Town is the next stop at 17.58.  
16           Clearly Tottenham Hale to Harlow Town exceeds the  
17           20 minutes. Also at 17.55 trains as well, 18.07, 17.55  
18           from Liverpool Street station, 18.07 from Tottenham  
19           Hale, 18.29 as well. And the 16.55 from Liverpool  
20           Street station, Tottenham Hale at 17.07 and the next  
21           stop is Bishops Stortford at 17.37. So those three  
22           services definitely exceed the 20 minutes on the  
23           section.

24   Q. Thank you very much. You can put that away.

25           Now can we turn on to some other questions about

1 existing forecast, airport passengers on the Stansted  
2 Express services. I just want to seek your opinion on  
3 two sets of figures that were put to you. The RUS -- we  
4 are back to that. I hope you haven't put that too far  
5 away. CD/312?

6 A. Thank you. I have that.

7 Q. I think you were taken to table 3.10 on page 40?

8 A. Yes, I have that.

9 Q. You remember we were looking at the peak hour figures.  
10 This is three hour peak figures, AM, PM, 1,062 and 1,339  
11 in the penultimate column?

12 A. Yes, I see.

13 Q. Then we were also looking in this context at CD/14.2,  
14 TAAU, paragraph 4.5 .1 on page 23. Do you remember that  
15 set of figures?

16 A. Yes, I have that. Thank you.

17 Q. Which I think is also a three hour set of figures, the  
18 AM and the PM peak. Do you have those?

19 A. Yes, I have. Thank you.

20 Q. Now this is the figure, the set of figures for the 25  
21 MPPA forecasts. This is without G1 for the AM peak and  
22 the PM peak. We can see that from the present figures  
23 in the RUS, the 1,062, we are going to 1,800 in the AM  
24 and the PM 1,339 to 2,000. Now you have already given  
25 evidence about existing overcrowding. You see what's

1 predicted with 25 MPPA. What does that tell us about  
2 the effect of loading a further 10 MPPA on to the  
3 Stansted Express that is now proposed?

4 A. Obviously in the TAAU shown in the year 2014 at 25 MPPA,  
5 if you include another 10 MPPA, which takes it up to 35  
6 MPPA, we would expect that figure to go up quite  
7 substantially in both peak periods, bearing in mind,  
8 bearing in mind the current peak period is already  
9 congested.

10 Q. Thank you. Now let us turn on from that, please. You  
11 can put that away. You really can put that away now.  
12 You were asked about whether you were concerned what  
13 type of passenger your concern related to. Again I just  
14 want to seek clarification on this because, as I say, I  
15 was not entirely sure I understood the question or the  
16 answer. Do your concerns about overcrowding relate to  
17 the attractiveness of Stansted Express services to  
18 airport passengers, non-airport passengers or both?

19 A. I think Essex County Council is concerned with airport  
20 and non-airport passengers, because the current service  
21 between Liverpool Street station and Stansted are really  
22 what we call a mixed service for commuters as well as  
23 for airport passengers. Essex County Council and also  
24 Herts, I am sure, would like to see it stay that way, as  
25 a mixed service.

1 Q. Thank you. Then I have already asked you about the  
2 20 minute delay. We dealt with that. We are nearly  
3 there. Thank you very much, Mr Wang. Thank you, sir.

4 MR PHILLIMORE: Thank you, Mr Hill.

5 Questions from THE TRIBUNAL

6 MR BOYLAND: Just a couple of points, if I may. I presume  
7 you were not here. The local MP, when he gave his  
8 evidence last week, referred to the capacity of the  
9 tunnel beneath the runway into the airport, which is  
10 a single track tunnel. He said that because it was  
11 single track, it limited the capacity to two return  
12 trips per hour, two trains per hour. Can you comment on  
13 that?

14 A. I am afraid not. I have not been charged to look into  
15 that, which is more akin with the G2 issue, but as far  
16 as we know the G1 situation, it could accommodate a 12  
17 car train and the layout, if you like, does allow for  
18 that. So we are not proposing new additional, if you  
19 like, services to that.

20 Q. No, I realise that. The issue wasn't about the length  
21 of the trains. It was about frequency. I mean, in your  
22 view is it credible to say the tunnel can only cope with  
23 two trains -- two return trips by trains per hour?

24 A. No, I can't comment on that, no.

25 Q. Okay. Thank you. Going back to the dreaded matter of

1 capacity on the trains, we have dealt, I think, as  
2 thoroughly as we can with the question of what the  
3 capacity standard should be. Looking at the definition  
4 of PIXC, that does seem to make an allowance for  
5 standing on certain trains for journeys of under  
6 20 minutes. Do you take that to mean the overall  
7 journey length or is that taken on a leg by leg basis of  
8 each journey?

9 A. We have considered it on a leg by leg basis so that if  
10 we were quizzed so that you could understand that nobody  
11 stands more than 20 minutes, if you like, on that. Each  
12 stop is like that. On that basis we have approached it  
13 on a very conservative basis, as it were.

14 Q. So on that basis it would not be deemed to be  
15 overcrowded if a passenger coming to the airport had to  
16 stand, for example, as far as Tottenham Hale and were  
17 then able to get a seat. Is that the way you approach  
18 it?

19 A. The way I approach it, if they get on to Tottenham -- if  
20 they manage to get a seat at Tottenham Hale and don't  
21 get off, say, at Bishops Stortford.

22 Q. We are talking about airport capacities now?

23 A. If it goes on, that would be -- if the stop is, if you  
24 like, the airport, then that will be a problem, because  
25 from Liverpool Street station to Tottenham Hale is

1 11 minutes. The whole journey is 46 minutes. So it is  
2 over 30 minutes, over 20 minutes and that we would  
3 consider as a problem if he has to stand all that way.

4 Q. I am not suggesting they have to stand all the way. If  
5 a passenger gets on at Liverpool Street and has to stand  
6 as far as Tottenham Hale, people then get off at  
7 Tottenham Hale and that passenger gets a seat at  
8 Tottenham Hale for the remainder of their journey, is  
9 that a problem in terms of overcrowding or is it not?

10 A. It's not, but the issue is there are more people getting  
11 on at Tottenham Hale than getting off.

12 Q. Yes, I accept that. I am just using that as an example.

13 A. Uh-huh.

14 Q. All I was trying to establish was whether the 20 minutes  
15 is simply a reference to, in effect, that nobody should  
16 have to stand for more than 20 minutes. Is that what  
17 it's saying in effect?

18 A. Yes, that is the effect.

19 Q. Not that on a journey of more than 20 minutes nobody  
20 must stand at all?

21 A. My understanding is that for a bite sized -- you know,  
22 if it is going to be a journey from one, you know,  
23 wherever, origin to the destination, that person  
24 shouldn't stand more than 20 minutes.

25 Q. Okay. Then it appears to me that the Department for

1 Transport does advise a certain amount of averaging on  
2 this. In the letter from the Department for Transport  
3 on DFT Rail, which has been referred to, and it is  
4 appendix A to ECC/1/E, they are saying that there are  
5 some overcrowded trains within the peak period but ...  
6 That's not really the point. What prompted my question  
7 was going back to the rail utilisation strategy, the  
8 RUS, where it says that there will be too much capacity  
9 on the route north of Stansted Mountfitchet but not  
10 enough further south. The intervention provides enough  
11 capacity to maintain current average morning peak load  
12 factors until 2016.

13 Is there a bit of taking the rough with the smooth,  
14 so if there is overcrowding on some trains but under  
15 capacity on others, then that's taken, on a route basis,  
16 as being satisfactory?

17 A. I think that's how the DFT has interpreted it, but  
18 obviously ECC's concerns would be if that's the case, it  
19 would discourage people to get on those trains and we  
20 might be already seeing the deterioration of that just  
21 now happening, where people are moving on to coaches  
22 from the trains. There is a drop in road share on the  
23 trains.

24 Q. Thank you very much.

25 A. Thank you.

1 MR PHILLIMORE: Just while we are on Stansted Express,  
2 looking at the condition that you are suggesting, the  
3 Grampian style condition, and part 2 of that condition,  
4 where it refers to towards the end of that:

5 "... without compromising further the standard of  
6 other West Anglia mainline services."

7 There has been quite a lot of evidence to the  
8 Inquiry by third parties in particular concerned about  
9 the inter-relationship between Stansted Express and  
10 other services on the West Anglia mainline. Could you  
11 comment further in relation to what you intend by way of  
12 that condition in terms of avoiding compromising those  
13 other services? What specification would you apply to  
14 that?

15 A. I think that phrase there really was to do with the fact  
16 that we would like to ensure that if we were to  
17 implement that measure, and there seemed to be, if you  
18 like, other services absorbing that number of people  
19 getting off and on to those trains and making those  
20 trains congested in itself, so by solving one problem,  
21 you create another problem, and the point of this is to  
22 say we shouldn't be doing this. We should be looking at  
23 that and be aware if you were to implement those sort of  
24 12 car trains, you have to consider those other services  
25 together alongside the STEX as well. We shouldn't, like

1 I say, you know, solve one problem with the STEX and  
2 create another problem on the other services or on the  
3 same line.

4 MR PHILLIMORE: What would be your baseline for measuring  
5 that?

6 A. I think it would be along the same lines as what the DFT  
7 has set up. So it would be a DFT criteria. West  
8 Anglia, it would be one seat per passenger.

9 Q. With regard to coach services, we haven't actually been  
10 on the National Express service to London, but we are  
11 certainly very familiar with the routes, the M11 in  
12 London and roads in London itself. Do you see any scope  
13 to reduce journey times by coach through congestion  
14 measures and I am thinking in particular of the M4 bus  
15 lane? Do you see any potential for measures of that  
16 nature in relation to routes from Stansted to London?

17 A. That sort of measure may be helpful on the M11 itself,  
18 but once you get into London with all the traffic lights  
19 and the actual traffic conditions itself, as you are  
20 well aware that the average speed in London, vehicular  
21 speed in London, is about 15 miles per hour in the  
22 middle especially, or less. That in itself is  
23 a problem, how that could be solved. You might  
24 introduce other measures, bus priority measures  
25 alongside that. It could certainly happen if one

1 applies oneself to it, but it will take a lot of other  
2 authorities to get involved with it as well, and the  
3 London Mayor as well, to get involved with it.

4 MR PHILLIMORE: Thank you. The final point I wanted to  
5 raise in relation to the conditions recommended by the  
6 Highways Agency, which I understand are agreed between  
7 the parties, do you want to make any comment in relation  
8 to the funding of those works that will be covered by  
9 those conditions?

10 A. Sorry. I don't understand the actual question.

11 Q. Is the works to -- covered by the conditions recommended  
12 by the Highways Agency, which --

13 A. For the current G1?

14 Q. That is correct, yes. I am asking about the funding for  
15 those works. Do you want to make any comment in  
16 relation to that?

17 A. Okay. Essex County Council does support that, because  
18 it is based on nil detriment approach and it is as  
19 tested per the circular 05/205. So we have no argument  
20 and no quarrel with that. We support the Highways  
21 Agency on that.

22 Q. If terms of the funding for those works to actually be  
23 carried out, can you help me with that at all?

24 A. As far as I know some of the works are all done by BAA  
25 especially, the ones around the airport roads itself,

1 and along the M11, junction 8, there's a combination of  
2 some monies from BAA to help them, which they are trying  
3 to revise and remodify and improve the M11, junction 8  
4 as well. So there are, as I understand it, some  
5 maintenance works undertaken by Highways Agency  
6 alongside what BAA will contribution to help improve  
7 that junction currently.

8 Q. I am not sure I have actually seen any evidence for  
9 that. Maybe that's something that BAA could provide as  
10 regards to their evidence. I am not sure -- I don't  
11 think we have seen that at all in the evidence that has  
12 been put before us so far. Maybe that can be taken up  
13 at a later stage. That's all my questions. Thank you  
14 very much, Mr Wang.

15 A. Thank you.

16 (Witness withdrew)

17 MR PHILLIMORE: Mr Hill, are you ready to call Mr Humby?

18 MR HILL: I am, sir, but I suspect it would be sensible to  
19 take your break now and allow everyone to take places.  
20 We also have to distribute the documents that I alluded  
21 to yesterday. So if that could coincide with the  
22 morning break, that would suit us.

23 MR PHILLIMORE: Are you able to distribute those now before  
24 the break?

25 MR HILL: Yes. I am sure we are. Can we do it after you

1 have adjourned, sir?

2 MR PHILLIMORE: Okay. It is 11 o'clock. We will adjourn  
3 until 11.15.

4 (11.00 am)

5 (Short break)

6 (11. 15 am)

7 MR PHILLIMORE: We can resume, please. Mr Hill, would you  
8 like to introduce Mr Humby?

9 MR HILL: Thank you very much indeed, sir. We need the HCC  
10 1 series which has been augmented with one or two  
11 documents during the short adjournment, and it would  
12 also be useful to have to hand the three documents that  
13 came from BAA yesterday, that's BAA/3/F, G and H.

14 MR DAVID HUMBY (called)

15 Examination-in-chief by MR HILL

16 MR HILL: Now, Mr Humby, good morning. We will be working  
17 principally from your supplementary proof of evidence,  
18 but could I just turn to your principal proof, HCC/1/A,  
19 page 3 to introduce you to the Inquiry? You are David  
20 John Humby. Is that correct? Are you switched on?

21 A. I am switched on, yes. Yes, my name is David John  
22 Humby, yes.

23 Q. That's the easy one. You say in your brief you are head  
24 of transportation, planning and policy of the strategic  
25 planning partnership group of the Environmental

1 Department of Hertfordshire County Council. You are  
2 a Chartered Engineer, a member of the Institution of  
3 Civil Engineers and member of the Institution of  
4 Highways and Transportation. You are responsible for  
5 developing transport policy in the county including the  
6 preparation of the county's LTP and for dealing with the  
7 transportation implications of the development  
8 proposals?

9 A. That is correct.

10 Q. As with Mr Wang and no doubt Mr ForsheW, you have been  
11 working, as I understand it, on assessing the TA and  
12 other documents and producing this evidence with the  
13 assistance of a team?

14 A. That's correct.

15 Q. Thank you. Now, can we just try to deal with the  
16 documentation before we get into the substance of the  
17 evidence? We circulated during the short adjournment  
18 a document that we have called HCC/1/E, which is  
19 a series of documents that BAA have helpfully provided  
20 to us over the course of the past weeks, months,  
21 whatever, in order to illuminate the position in  
22 Hertfordshire. Is that correct?

23 A. Yes, that's correct.

24 Q. And which we discovered upon close examination had not,  
25 at least not in the form we have them here, all made

1 their way into the public domain in the context of the  
2 TAAU. This is BAA material which for one reason or  
3 another may not easily be found elsewhere in the  
4 documentation but which we have relied upon and which is  
5 referred to in your proof.

6 A. That is correct.

7 Q. The one in particular we should note, in case this gives  
8 cause for future confusion, the document with a 3 in the  
9 bottom left-hand corner, if everyone has the same set as  
10 me?

11 MR PHILLIMORE: I think we are confused.

12 MR HILL: Do you have a 3 in the bottom left-hand corner?

13 MR BOYLAND: This is within HCC/1/E?

14 MR HILL: Yes. I am sorry. This is the 2014 forecast AM  
15 peak hour. That can have the extra label "TAAU figure  
16 5.7 amended" annotated on to it. The original figure in  
17 TAAU has some of the flows transposed. So the boxes  
18 need to be switched around.

19 MR PHILLIMORE: Can you just repeat that, Mr Hill?

20 MR HILL: Sir, it is my understanding -- I am trying to take  
21 this quickly by leading on this matter -- I think the  
22 TAAU figure 5.7 has some inaccuracies so far as the  
23 position of the boxes in A120 is concerned. When we  
24 drew this to BAA's attention, they issued a replacement  
25 document, which is this document, which I understand

1           supersedes figure 5.7 in the TAAU.

2   MR HUMPHRIES:  Sir, I think it relates to simply two boxes  
3           on either side of the road that have just got reversed.  
4           Maybe Mr Hill -- I mean, if someone describes which two  
5           it is, I am content.

6   A.  Would it be helpful for me to point out?  My  
7           understanding is in figure 5.7 of the TAAU if we go to  
8           the west of the M11 and the first section of the A120  
9           Bishops Stortford bypass, there are some boxes that  
10          start at 1277 down to 1259 on one side of the road and  
11          1100 down to 1128 on the other side of the road.  My  
12          understanding is that those were merely put on the wrong  
13          side of the road.  So the two sets of boxes need to be  
14          transposed in terms of the direction of flow.  The  
15          numbers themselves, as I understand it, are not changed.

16  MR HUMPHRIES:  Sir, can I just add to that, because it's  
17          a common error in that diagram, if you have the TAAU you  
18          may have, as I have, just a sort of arrow to switch the  
19          two boxes round.  If you go to the next figure, 5.8 and  
20          look at the same two boxes, again they switch.  You will  
21          note that in 5.7 the higher numbers should be on the  
22          direction of travel going towards the motorway.  That's  
23          in the AM peak.  5.8, you will note again you switch the  
24          boxes round, because in the PM peak the higher flow is  
25          going away from the motor way.

1 MR BOYLAND: So 5.8 is correct?

2 MR HUMPHRIES: No, 5.8 is also switched.

3 MR BOYLAND: I beg your pardon. I am looking at 5.9.

4 MR HUMPHRIES: 5.8 is switched, because in PM peak flow the  
5 high flow would be away. 5.9, again we are back to the  
6 20.23 AM peak. The boxes have simply been transposed  
7 and figure 5.10 exactly the same thing. So in each case  
8 simply the two boxes have been transposed and we meant,  
9 sir, to produce an errata sheet. We told the County  
10 Councils about it. For whatever reason the errata  
11 failed to come out. It is a simple correction. They  
12 are the right numbers but just on the wrong side of the  
13 road. Thank you.

14 MR HILL: That's that. I don't propose or need to say  
15 anything further about HCC/1/E for the time being. The  
16 next document that we want just to mention at this  
17 stage, Mr Humby, is the sheet headed HCC/1/D, table D7  
18 updated with 35 million plus 15% forecasts. That was  
19 one of the two loose sheets that was circulated during  
20 the short adjournment. Again, perhaps you can just  
21 confirm that what this does is reproduce some of the  
22 work that's undertaken in your supplementary, taking  
23 advantage of the figures that we saw, I think, for the  
24 first time in Mr Forsheew's supplementary proof, which  
25 gave the plus 15% sets of data for the with and without

1 the Little Hadham bypass flows?

2 A. Yes, that's correct.

3 Q. So just reworked figures with the data that's now  
4 available. Just to confirm that this is right, the last  
5 three columns in the original table D7, that's material  
6 effectively provided in table D8 as a separate table,  
7 but to try to reduce the amount of paper we produced, we  
8 have tacked that information on to this revised  
9 table D7?

10 A. If it would help, effectively what has happened is  
11 table D7 that's in my original supplementary proof has  
12 had an additional column added to it to incorporate the  
13 35 plus 15% information that came from Mr Forshe's  
14 proof. That means we also have an additional column on  
15 the right-hand side in terms of the calculation of the  
16 percentage of airport growth divided by the sort of  
17 total growth as well for that particular scenario.

18 Q. We will come back to which of the figures in that  
19 table you want particularly to draw to the inspectors'  
20 attention in due course. Just to introduce the document  
21 and explain how it fits in. That should be kept with or  
22 stapled into HCC/1/DE.

23 The last document to introduce, free standing  
24 document, was, I think, given the title "Appendix D1  
25 amended". That is fairly straightforward. Appendix D1

1 in the supplementary proof is simply data extracted from  
2 the TA about hourly movements, passenger and employee  
3 figures. I think it was noticed that some of the  
4 figures in the last but one column have been incorrectly  
5 inserted and they have been corrected now?

6 A. Yes, that's the information, I think, that was put in,  
7 was referred to in the Inquiry yesterday morning that  
8 BAA submitted, and I think we suggested yesterday that  
9 it would, if you like, come back out again as an amended  
10 document in my proof. It merely changes, as is  
11 highlight on the note that BAA provided, some of the  
12 numbers that have been taken from tables already in the  
13 TA, but the information that I use in the proof actually  
14 relates to the totals, which is the right-hand column,  
15 and those were correctly drawn over. It was merely five  
16 numbers on departures, as I understand it.

17 Q. I am glad you take a perverse pleasure in these tiny  
18 changes. The penultimate column, where it says depart,  
19 is 516 and the original table down to 399 had been  
20 changed. It is five figures, 516 to 399, have been  
21 changed. The total figures, as you explain, are the  
22 same. Good. That is the documents.

23 What I propose to do, with Mr Humby, sir, so far as  
24 his evidence is concerned is deal with a number of  
25 matters away from the proof, as it were, and hopefully

1 bring you up-to-date with what has changed even since  
2 the issue of the supplementary last Wednesday, and then  
3 just invite Mr Humby to read some of the conclusions  
4 section, if that's acceptable.

5 There are two themes to your evidence I think,  
6 Mr Humby, we can fairly say by way of introduction.  
7 First, uncertainties in the modelled outputs so far as  
8 they affect Hertfordshire?

9 A. That's correct, yes.

10 Q. And, second, the level of contribution which BAA should,  
11 in the county's view, make to the proposed Little Hadham  
12 bypass. So those are the two issues that we need just  
13 to tie up a few loose ends on before reading the  
14 summary.

15 Dealing, firstly, with the uncertainties in the  
16 model outputs of Hertfordshire, the position is set out  
17 in your evidence, but we now have to just assist the  
18 Inquiry with BAA/3/F, G and H, which I think are seeking  
19 to address some of those uncertainties flagged up in  
20 your proof. Now I know you have done your best to look  
21 at these overnight and during the course of yesterday.  
22 I know it is not impossible that you might have some  
23 further thoughts on this after your evidence is  
24 concluded, in which case we will put a note into the  
25 Inquiry.

1 A. Yes. The short point is that in our evidence we point  
2 out that the forecast traffic flows in 2014 at Little  
3 Hadham in the TAAU were lower than the figures in 2003  
4 and that seemed somewhat perverse to us bearing in mind  
5 that flows have increased.

6 Q. We'll take it stage by stage. We may as well take the  
7 documents in the order which they have been referenced,  
8 BAA/3/F, G and H. We will start then with 3F. As you  
9 rightly point out, one has this oddity as HCC would have  
10 it that, notwithstanding increasing congestion and  
11 regional growth, etc, the figures eastbound on the AM  
12 peak on the A120 fall from 2003 to the 2014.

13 MR HUMPHRIES: I think that's the issues in G. You said F.

14 A. No.

15 MR HILL: I think it is F. I think it is F.

16 MR HUMPHRIES: Sorry. I am trying to be helpful.

17 MR HILL: I hope it is F.

18 A. It is to do with F but what F provides is a revised set  
19 of calculations using the TAAU with a revised, as  
20 I understand it, a revised modelling of the traffic  
21 lights at Little Hadham. It would appear that BAA have  
22 now observed what the traffic lights are doing at the  
23 moment and actually input into their model the traffic  
24 signal timings that exist out there on the ground.

25 MR HUMPHRIES: There is a difference. I have got the wrong

1 covers.

2 MR HILL: We are ahead. Yes, essentially BAA would seem to  
3 realise that we have a point here and have re-run the  
4 model, as you have just explained, changing the  
5 assumptions about the operation of the lights at Little  
6 Hadham. That's what it comes down to and the figures  
7 all change. That's what one picks up from figure 1 that  
8 accompanies BAA/3/F, and particularly focusing on the  
9 A120, looking at the key in the top left-hand corner,  
10 and bearing in mind that the boxes are 35 MPPA enhanced,  
11 ie what's already before the Inquiry, then this new run  
12 with the change to the Little Hadham signal timings and  
13 then the change is the lower of the three boxes. As  
14 before we have all the traffic on the left and airport  
15 on the right. Focusing on the A120, we can see in the  
16 AM peak A120 eastbound, which is where the flows are  
17 more important, we have an extra 226 movements going  
18 eastbound on the A120, of which 23 are said to be  
19 airport traffic. Is that right, Mr Humby?

20 A. Yes.

21 Q. There are various changes shown elsewhere. I know you  
22 have only had a relatively preliminary look at this new  
23 material, which is a new run through of the model for  
24 these purposes. Can you just help us with whether there  
25 are any issues that arise from figure 1, anything that

1 strikes you as worthy of mention in so far as the  
2 analysis of the output is concerned?

3 A. Clearly there is a lot of information here and it will  
4 need further investigation. If it would assist, you  
5 know, we can put a note in on those matters, but  
6 immediately looking at the information, there is clearly  
7 a significant increase in flow on the A120 of more than  
8 200. One tries then to look to see where that may have  
9 come from and to some extent that's assisted by the  
10 diagram that follows, which shows green is reduction and  
11 red an increase. It is somewhat surprising to me that  
12 there appears to be little or no change in flow on the  
13 A10 south of the A120 between the A120 junction of the  
14 A10 and Ware, and whilst there is a reduction flow on  
15 the B1004, which is the local route from Ware to Bishops  
16 Stortford, which is to the south of the A120, the yellow  
17 road there, it is difficult to see from the figures  
18 where that transfer, apparent reduction on B1004 appears  
19 as an increase on the rest of the network. One would  
20 expect to have seen it either on the A 10 or perhaps  
21 Bishops Stortford. So whilst it provides some helpful  
22 information, it has raised actual issues of detail in  
23 terms of what it is demonstrating.

24 Q. Let us just make sure we have picked up those points  
25 that you have made. We have seen the 226 extra

1 eastbound on A120 in the Little Hadham area which is the  
2 result of freeing up the way in which the model runs,  
3 the A120 and the traffic lights as a constraint. Two  
4 points you have just made in relation to that are going  
5 northbound on the A10 from Ware, Hertford, if one were  
6 proceeding up to the A120 junction to turn right and  
7 proceed towards Bishops Stortford, the A10 flow is  
8 actually shown as a reduction of 11 on the northbound  
9 carriageway of the A10.

10 The other point you made is, to pick up the right  
11 box -- is that box actually superimposed over the A120?

12 A. Yes, it is. The 335242 minus 93 on the B1004.

13 Q. Those people who were travelling from Ware to Bishops  
14 Stortford in the northeast direction on the B1004, 93  
15 have disappeared but they are not travelling up the A10.  
16 You haven't been able to pick up where they have gone.  
17 Very well. We will see if that is taken any further  
18 illumination and if it is, we will put in a note to deal  
19 with that. Is there anything else you want to say at  
20 the moment about that, bearing if mind we are going to  
21 come back to in the second issue? I want you to help  
22 the Inquiry on the impact on the Little Hadham bypass  
23 contribution matter, which is a separate point.

24 A. Obviously the figures will change some of the  
25 calculations that we have carried out if we bring these

1           into the -- we will bring those into the tables further  
2           on in my evidence.

3    Q.   We will come to that.  I can say now we have certainly  
4           not been able to recalculate everything on the basis of  
5           the material we have.

6    MR BOYLAND:  Before you leave that, we may be missing the  
7           obvious but what is the significance of the highlighted  
8           boxes on that?  You have not referred to those.

9    MR HUMPHRIES:  Those are the locations close to Little  
10           Hadham.

11   MR BOYLAND:  That's what I wondered.  I just wondered why  
12           reference has been made to the boxes further to the  
13           west.

14   A.   The highlighting is, as I understand it, BAA's  
15           highlighting.  They have pointed out that by changing  
16           the modelled operation of the traffic -- changing the  
17           operation of the lights in their traffic model has  
18           resulted in amended flows across a wide area of the  
19           network.  They have chosen to highlight the section of  
20           A120 between Little Hadham and Bishops Stortford bypass.  
21           That's one of the links that we do consider in detail,  
22           obviously in evidence.  It obviously has a widespread  
23           impact across the whole of the network.  That's what we  
24           are drawing --

25   MR BOYLAND:  I understand that.  It is just the discrepancy

1           between the highlighting and the boxes that have been  
2           referred to.

3   MR HUMPHRIES:  The yellow, I can be  be absolutely candid --  
4           I asked for it to be put on just to make it easy for  
5           everyone to identify which was the note here closest to  
6           Little Hadham.  There is no greater mystery than that.  
7           It is me trying to be helpful, probably wrongly again.

8   MR HILL:  I suspect, if one were to carry out that exercise  
9           it to be equally valid be correct to put the yellow wash  
10          over the boxes we have asked about on the other side.  I  
11          am not take time on that point.

12                 Thank you very much.  Let us move on to BAA/3G,  
13          hoping Mr Humphries has his front pages switched round.  
14          This is another matter, what I might simply, for  
15          convenience, refer to as the Bishops Stortford black  
16          hole, which you deal with in your evidence, where large  
17          numbers of vehicles appeared to disappear when  
18          an attempt was made to add up the various movements on  
19          the junctions around Bishops Stortford.  That's dealt  
20          with in your evidence in detail and I am not going to go  
21          through that.  It is appendix D2 at the back of the  
22          supplementary for those taking a note.

23   Q.  Now we have got some additional information now provided  
24          in figures 1 and 2 which accompany the BAA/3/G note.  Is  
25          there anything you want to draw to the Inquiry's

1 attention at this stage, Mr Humby, about all this  
2 material? Now is your opportunity.

3 A. I think there are two points that I would like to make  
4 about this information, and I'm referring in particular  
5 to the second of the two diagrams, the one that has all  
6 trips on it, not the airport related diagram, the first  
7 one.

8 MR BOYLAND: On our copy figure 1 is all trips and figure 2  
9 is airport only.

10 A. They have become transposed in the version I have got.

11 MR HUMPHRIES: I think what we have done is we have randomly  
12 stapled front sheets to various different sheets, as a  
13 surprise for you all.

14 MR HILL: It is true in the versions we have of B/G figure 2  
15 comes before figure 1.

16 MR PHILLIMORE: If we talk in terms of figure numbers.

17 MR BOYLAND: Figure 1.

18 A. Figure 1. There are two things that are drawn to  
19 attention. First of all, if you look at the diagram,  
20 there is -- clearly the top of the diagram is where the  
21 A120 is coming from Little Hadham and goes round to the  
22 Bishops Stortford bypass and goes into Bishops  
23 Stortford. Immediately to the south of there is  
24 a roundabout with a stub end going into the right. Now,  
25 my understanding of that area is that's where there is

1 a Tesco's store and where there's a residential area,  
2 which is essentially cul de sacs, and yet we appear to  
3 have, as a result of the Little Hadham bypass,  
4 a reduction of 88 trips coming out of that point. It  
5 doesn't seem very clear to me. The second point is at  
6 the top of the diagram you can see that there is  
7 an increase in flow of 220 or so -- 226 movements  
8 turning left from the A120 on to the Bishops Stortford  
9 bypass, which I assume is the result of the increased  
10 flows on the A120 through Little Hadham as a result of  
11 the bypass, because this diagram is looking at the  
12 change as a result of the bypass. Yet there appears to  
13 be no increase in flows on the Bishops Stortford bypass  
14 itself. Indeed, the figure of minus 5 actually shows  
15 a reduction. So it surprises me that one gets  
16 an increase in flows on the A120 coming from Little  
17 Hadham with no apparent change in flow on Bishops  
18 Stortford bypass itself.

19 MR BOYLAND: Isn't that because the traffic approaching that  
20 junction from the south decreases by 231? Whether  
21 that's logical I don't know, but that's how the figures  
22 add up.

23 A. That could be part of the answer, yes. Obviously what  
24 it also does is leads to an increase in traffic going  
25 into Bishops Stortford of 190 vehicles. So what we

1 appear to have perhaps is that maybe the bypass is  
2 constrained and therefore traffic is actually travelling  
3 through Bishops Stortford.

4 Q. Yes. Can we just try to pick up some of the figures,  
5 because people are trying to follow this. We are  
6 looking here at what happens when you build Little  
7 Hadham bypass. That's right, is it not, Mr Humby?

8 A. Yes.

9 Q. That's what we are examining, what effect it has on the  
10 flows around Bishops Stortford, in particular the A120.  
11 As you pointed out at the top of the page, the minus 5,  
12 you build a bypass making things easier through Little  
13 Hadham, but the reduce the flows going north of Bishops  
14 Stortford by 5. You draw attention to the fact you have  
15 got an additional 226 turning on to it from the A120 and  
16 equally in the bottom left-hand corner one has a -- one  
17 is losing 203 vehicles that would have been coming in  
18 from the B1004. So you have to transfer, as expected  
19 and as no doubt hoped for by the county, from the Much  
20 Hadham road to the A120, but you have got no overall  
21 increase, but you have got a reduction on the through  
22 movements, the A120, having built a bypass. Is that  
23 what you read from these figures?

24 A. Yes.

25 Q. What you have got is another 190 plunging into the heart

1 of Bishops Stortford. Yes?

2 A. Yes.

3 Q. Again, if anything further emerges on that that can  
4 throw light on that and we discuss it, we can do so and  
5 put in a note to the Inquiry.

6 The last one is BAA/3/H. This is dealing with the  
7 point you made in your evidence that G1 is expected to  
8 create new employment which -- 354 new employees are to  
9 be present in Bishops Stortford, but apparently that  
10 leads to no additional peak hour trips on the network.  
11 We are looking at AM peak here obviously. Can you just  
12 give your response to this material, please, if  
13 necessary by reference to other documentation that I  
14 hope will illuminate the Bishops Stortford position?

15 A. We deal with the matter as is indicated in 2.15 and 2.16  
16 of my supplementary proof, but the point is related as  
17 well to the issues raised in paragraphs 2.13 as well.  
18 I understand the amended calculation that BAA have  
19 submitted and it clearly uses more detailed information  
20 available within the TAAU that we haven't been able to  
21 find. I think there are two points that have come out  
22 of this. Whilst it reduces the figure from 23 trips to,  
23 I think, an additional 7 trips, it still seems to me  
24 that an additional 7 trips in the morning peak from at  
25 least 354 residents of Bishops Stortford, additional

1 employment at the airport being taken up by residence of  
2 Bishops Stortford appears to be a low figure. Of  
3 course, this calculation is merely working out what that  
4 figure will be within the peak hour, but obviously if  
5 they are not going to occur between 8.00 and 9.00 as  
6 indicated, then those additional trips will occur at  
7 other times of the day, and have an impact on Bishops  
8 Stortford. As we have indicated in paragraph 2.13 of my  
9 supplementary, if one looks at some of the traffic  
10 assignment information, it would suggest that there may  
11 be as little as a net increase of zero in traffic  
12 movements from Bishops Stortford to the airport for  
13 employees. So I think there are two points here. One  
14 is the low -- still represents the low figure in terms  
15 of the total increase in employment and, secondly, the  
16 figure of 8, and an increase of 7, I have difficulty  
17 finding in actual traffic assignments.

18 Q. Take us back again, so we can follow the figures in  
19 paragraph 2.13 at table D4, page 10 of your  
20 supplementary, so we can work out how, as you've  
21 analysed the figures, you don't get any additional  
22 traffic at all, airport-related traffic coming out of  
23 Bishops Stortford in the AM peak even though we get  
24 another ten million passengers per annum and increased  
25 employees. Is it the last column, the increase 35 to

1 45?

2 A. Yes. In table D4 I have extracted traffic flow  
3 information from the figure 5.7 under base figures from  
4 the TAAU. In the right-hand column I am looking in  
5 particular at the links coming from Bishops Stortford  
6 going towards the airport. There are two principal  
7 links, which is the A1250 Hadham Road eastbound going  
8 towards the airport and the B1383 northbound, which  
9 comes out to one of the junctions on the bypass.  
10 Looking at the traffic flow figures, in particular  
11 looking at the difference between 25 and 35 million, as  
12 I indicate on the right-hand column, there's an increase  
13 in flow of airport-related traffic of 1 on the A1250 at  
14 25 to 35 and an increase of 12 on the B1383. I have  
15 then added those together further down as a figure of  
16 13.

17 Q. So we are looking at the penultimate column figures on  
18 the whole of that table, the 1 and the 12, and 13  
19 becomes the total?

20 A. It becomes 13. So there appears to be an increase of 13  
21 employees or 13 car movements coming out of Bishops  
22 Stortford in the morning peak. If you look at the  
23 southern -- if you look at the bottom of figure 5.7 at  
24 the bottom end of Bishops Stortford, where the A1184  
25 comes into Bishops Stortford --

1 Q. Do we need just to pause to make sure we have got that  
2 one open?

3 MR HUMPHRIES: Can I get the reference again? I missed  
4 that.

5 MR HILL: Figure 5.7.

6 MR BOYLAND: You can get it from HCC/1/E, Mr Humphries, as  
7 well.

8 A. If you look at that, it is what's called figure 5.7  
9 amended I think, the document referred to. If you look  
10 at the southern end, you have at the southern point of  
11 Bishops Stortford -- unfortunately the road numbers  
12 aren't shown on the map, but the red road coming in from  
13 the south is the A1184 from Sawbridgeworth. Then the  
14 red road going round to the left is the Bishops  
15 Stortford distributor road and bypass, and there is  
16 a yellow road going into Bishops Stortford. If one  
17 looks at the difference between the 25, which is the top  
18 figure, and the 35 figure -- at the time I did this we  
19 used the enhanced 35 figure.

20 Q. That's the third row of the figures in boxes?

21 A. Then in the -- coming north from Sawbridgeworth on the  
22 A1184 there appears to be no airport-related traffic  
23 going around the bypass. It is zero. Further round  
24 there's an increase. It shows that there is 13  
25 vehicles, the 13 vehicles that have come up from

1 Sawbridgeworth are actually travelling on the yellow  
2 road into Bishops Stortford. Now that is the 1383. One  
3 assumes if traffic is coming from Sawbridgeworth and it  
4 is airport-related, it will actually need to get to the  
5 airport. Therefore it will come out the other side of  
6 Bishops Stortford at some point and therefore I assume  
7 be picked up on the B1383 figures or A1250 figures  
8 I referred to earlier. If you look at the difference  
9 between 25 and 35, you actually get a difference of the  
10 13. That's on the right-hand column of table D4 again.  
11 It is the bottom row of table D as 4 where I carried out  
12 those calculations.

13 Q. That's back in your supplementary page 10, you have got  
14 the, as you say, B 1383 site northbound?

15 A. That suggests we have 13 vehicles coming into Bishops  
16 Stortford, airport-related, and only -- and 13 going out  
17 at the top, which gives then that figure of zero, which  
18 again seems extremely low to me.

19 Q. It can't get any lower, can it, Mr Humby? Well, there  
20 we are. I don't think there is anything else that we  
21 can really say about BAA/3/H. So I will turn on and  
22 deal with the other matter, the percentage contribution  
23 matter, which is set out in your proof, supplementary  
24 proofs. We just need to update the enquiry. Just  
25 explain to us what is the most significant figure in the

1 table we have just put in, the D7 update to take account  
2 of the plus 15% output that Mr ForsheW reports in his  
3 supplementary.

4 A. Yes. In -- I think there are two points here. In the  
5 figure at table D7, as updated, I did indicate that we  
6 have added an additional column with the full detailed  
7 information that we have now had on 35 million plus 15%.  
8 What I have done is calculated using the formula that we  
9 have put forward the percentage of airport growth  
10 divided by total growth between -- for the 35 million  
11 plus 15% figures. In the right-hand column you will see  
12 a figure of 9.9%, which is based on the average of all  
13 of the flows, the two flows either side of Little Hadham  
14 on the A120. The figure of 9.9% should be compared  
15 with -- in paragraph 3.2 .1 of my evidence -- at that  
16 time we didn't have this additional information, but  
17 I sought to try to estimate what the effect would be at  
18 that flow level of plus 15%, and I have carried out  
19 a calculation which came to 9 .8% as shown on  
20 paragraph 3.2 1. We now have the actual information and  
21 that calculation becomes 9.9%.

22 Q. Thank you very much. I think we can only take this so  
23 far, but I know you have sought to look at the  
24 implications of BAA/3/F?

25 A. Yes.

1 Q. For this particular exercise. I alluded to that  
2 earlier. I don't think you have got anything conclusive  
3 to put before the Inquiry. Can you just deal with it in  
4 broad terms, if you would be so kind, if one changes all  
5 the flows from those we have been working with so far.

6 A. Obviously the effect of BAA/3/F is that it increases  
7 both the airport-related and the total traffic on the  
8 A120 without the bypass. I am assuming that the  
9 alteration to the traffic lights, if that alteration to  
10 the timings went into the model showing with the bypass,  
11 that it would have little or no difference to the flows  
12 on the A120. A benefit of the bypass is it  
13 significantly reduces the amount of traffic in Little  
14 Hadham. Therefore I have taken -- still taken the  
15 figures with bypass as submitted in Mr Forshe's  
16 supplementary. An initial calculation that I have done,  
17 recognising that it will reduce -- obviously these new  
18 figures would reduce the difference both in airport  
19 traffic and total traffic between the with and without  
20 bypass situation, that the figure of 9.9% that I had  
21 referred to in revised table D7 would become 9.7% with  
22 these new figures.

23 Q. Thank you. Can we then deal, finally, with -- sorry.  
24 I want to ask you, first of all is there anything else  
25 you want to assist the Inquiry with arising from

1 BAA/3/F, G or H?

2 A. No.

3 Q. Or the supplementary table update of D7?

4 A. Not at this moment, no.

5 Q. Can we turn then to the summary and conclusions  
6 section of your supplementary proofs on page 20?

7 I think I can invite you to read that through. It may  
8 be necessary just when we get to the point that deals  
9 with the Little Hadham bypass to add in the matters you  
10 have just referred to in summary so they can go in as  
11 a note in the margin to anyone who is reading this  
12 afresh, as it were. We will come to that in due course.  
13 Paragraph 4.1, please.

14 A. "Hertfordshire County Council is the highway authority  
15 for Hertfordshire, a county immediately west of  
16 Stansted Airport on the M11. Stansted's passengers and  
17 employees impact on transport in the east of the county  
18 both on the road, rail, bus and coach. In its response  
19 to Uttlesford District Council on the G1 application,  
20 County Council requested that the application should not  
21 be permitted without adequate conditions and obligations  
22 relating to, amongst other matters, surface access. The  
23 conditions would have included a cap of 35 million  
24 passengers per annum on any permission and obligations  
25 regarding improvements to local roads affected by

1 airport traffic and for bus and coach provision.  
2 Assurances were also sought regarding the implementation  
3 of the proposed rail strategy.

4 "These matters were addressed in Uttlesford District  
5 Council's reason for refusal 6 and HCC's concerns relate  
6 to all aspects of transport provision, bus and coach,  
7 rail and highway infrastructure. This evidence has  
8 dealt primarily with the impact on the local road  
9 network, notably in Bishops Stortford and on the A120  
10 west, with rail matters having been dealt with in detail  
11 by Essex County Council.

12 "The 2003, 25 MPPA planning permission was subject  
13 to a number of obligations to 2010 agreed to by BAA,  
14 including one for £1 million regarding provision of bus  
15 and coach services, one for 2 million as a contribution  
16 to local road schemes where there was an impact from  
17 airport-related traffic. Since the county's  
18 consideration of the G1 application, BAA Stansted have  
19 offered a new obligation for bus and coach of 2 million  
20 and offered to extend the existing local road obligation  
21 to 2014, but only at existing level of 2 million.

22 It is Hertfordshire's view that the additional  
23 traffic generated by the 35 MPPA proposal warrants  
24 a larger financial contribution obligation than that for  
25 the 25 MPPA permission. The TAAU provides new forecasts

1 of traffic, both airport-related and total traffic, in  
2 place of those in the TA. The AM peak forecasts are  
3 used to provide an assessment of impact on  
4 Hertfordshire's roads. As with the TA, it is  
5 Hertfordshire's view that the forecasts of  
6 airport-related traffic in any period may prove to be  
7 minimal figures. The TAAU forecasts contain a range of  
8 uncertainties which, while they do not wholly negate the  
9 value of the model, have significant implications when  
10 the figures are used to consider potential  
11 contributions.

12 "The major road affected is the A120 west, a main  
13 route to Stansted and junction 8 on the M11. It  
14 accommodates airport-related traffic including bus and  
15 coach services to the airport, but suffers from serious  
16 congestion at Little Hadham, just nine miles from the  
17 Stansted terminal. The road there is constrained to  
18 single file working controlled by traffic lights,  
19 creating average peak delays of about 7 minutes in each  
20 direction.

21 "As part of the 2003 permission BAA contributed  
22 £50,000 to upgrade the traffic lights, but this was  
23 a short-term solution. The delays are a serious problem  
24 on this primary route and cause traffic to divert to  
25 other less suitable roads. In 2006 the County Council

1 initiated a process to develop a long-term solution and  
2 having considered a range of alternatives, a bypass  
3 around the village emerged as the preferred solution.  
4 While any bypass would primarily be funded through the  
5 east of England regional funding allocation, the County  
6 Council would expect a contribution from BAA for this  
7 improvement. There are also other schemes planned on  
8 the A120 and in Bishops Stortford where airport-related  
9 traffic contributes to recognised problems. BAA  
10 Stansted have agreed in version 1 of the statement of  
11 common ground that an obligation regarding these schemes  
12 is acceptable and are relevant to any information. The  
13 issues is the proportion of the costs which BAA should  
14 meet and the resulting size of the obligation in  
15 financial terms. An understanding has been reached with  
16 BAA as to how the offered contribution for local roads  
17 would meet the requirements of the two County Council  
18 schemes in Hertfordshire, largely in Bishops Stortford  
19 and Essex, including the roundabouts on the A120  
20 north-east of Bishops Stortford. However, no offer has  
21 been made regarding Little Hadham that is acceptable to  
22 HCC.

23 "At present, using the 2003 figures, airport-related  
24 traffic at Little Hadham makes up about 8% of the AM  
25 peak traffic. Were the airport to develop to 35 MPPA

1 using the plus 15% scenario information, the proportion  
2 of airport related traffic would increase to 12% in  
3 2014. With the bypass in place and the airport at 35  
4 MPPA on BAA's forecast for 2014, AM peak total traffic  
5 would increase by 90 per cent, nearly 1,000 vehicles  
6 compared to a 25 MPPA airport and no bypass. Airport  
7 traffic would increase by nearly 70%, 70 vehicles, 100%  
8 eastbound towards Stansted. Airport-related traffic  
9 makes up 10% of the total traffic and the forecast  
10 increase in airport traffic at 2014 as a result of the  
11 permission increasing throughput from 25 to 35 MPPA  
12 using the 35 enhanced scenario and provision for the  
13 Little Hadham bypass is 8.2% of the increase in traffic,  
14 12.1% of eastbound traffic. Forecast levels of airport  
15 traffic are not accepted by HCC, but what is not in  
16 doubt is that the bypass will bring considerable  
17 benefits to airport users, passengers, employees and  
18 coach passengers, greatly improving access from the west  
19 and providing a better alternatives when the motorways  
20 M11 and M25 are congested. A contribution from BAA of  
21 10% of the cost of the bypass therefore is required.  
22 Construction costs are presently estimated at about  
23 £20 million.

24 "Contributions have been agreed for the junction  
25 improvements on the A120 north-east of Bishops Stortford

1 located in Essex and for road signally and public  
2 transport improvements in the town. In both areas  
3 airport-related traffic makes up an important proportion  
4 of the total traffic, with Bishops Stortford's location  
5 so close to the town inevitably meaning it is affected  
6 by airport-related traffic.

7 "The County Council, therefore, with the support of  
8 Essex County Council, request that if permission is to  
9 be granted, BAA Stansted should be obliged to make  
10 a contribution for local roads. Expenditure would be as  
11 agreed between BAA and the County Councils and set out  
12 in the latest version of the statement of common ground  
13 before the inspector, except in relation to  
14 a contribution for the Little Hadham bypass. A sum  
15 equivalent to 10% of the cost of the bypass, up to  
16 2 million, is requested on the bases set out in the  
17 proof of evidence."

18 Q. Perhaps there we could usefully add the cross-reference  
19 to paragraph 3.2 1 which you took us to earlier, where  
20 the 9.8% was mentioned.

21 A. Yes.

22 Q. Then we could also say "as supplemented orally in  
23 chief".

24 A. Okay.

25 "The inspector is respectfully requested only to

1 recommend the Secretary of State's approval for this  
2 proposal if it is accompanied by an obligation in  
3 line with the above."

4 Q. Thank you very much indeed, Mr Humby. Thank you, sir.

5 Cross-examination by MR HUMPHRIES

6 MR PHILLIMORE: Thank you very much. Mr Humphries, we have  
7 your estimate from yesterday of one and three quarters  
8 to two and a quarter hours. Does that stand?

9 MR HUMPHRIES: I have not started yet, sir. Give me time.

10 MR PHILLIMORE: You did give a similar estimate for Mr Wang.

11 MR HUMPHRIES: I was about 35 minutes over with Mr Wang.

12 You are right. I think -- obviously some things have  
13 been added and I will obviously have to deal with those,  
14 but in broad terms, yes. These estimates are always  
15 broad. Sir, would you like me to start now?

16 MR PHILLIMORE: Yes.

17 MR HUMPHRIES: Mr Humby, in the evidence-in-chief you have  
18 correctly identified what I regard as the two issues,  
19 which is any residual modelling uncertainty and the  
20 contribution to Little Hadham bypass. So I am going to  
21 ask you questions that focus to those issues, although  
22 there are some preliminary things we will look at first.

23 Can we just look at the Herts County Council report  
24 in the way we did yesterday in relation to Essex? The  
25 document is CD/276. If we just look at the letter from

1 the Director of the Environment to Mr Mitchell at  
2 Uttlesford? On the front we can see from that indented  
3 proposal which was accepted that Uttlesford had to be  
4 informed that the Hertfordshire County Council would  
5 object to the current proposals unless stringent  
6 planning conditions and section 106 requirements are  
7 imposed on any permission to control and manage as far  
8 as possible and mitigate the growth of the airport as  
9 set out in the appendix. Clearly, I know you are  
10 dealing just with a highway issue. Again, I think you  
11 can confirm to me, I think it has been touched on  
12 earlier in the enquiry, there was no in principle  
13 objection to the G1 proposal from Herts County Council?  
14 It was a question of appropriate mitigation?

15 A. That's correct, yes.

16 Q. Thank you very much. Now obviously whilst other issues  
17 are raised, I am only going to touch with you on the  
18 highway related ones. Could you just turn in the  
19 document to paragraph 8.6?

20 A. Yes.

21 Q. That's in the section on surface access. It tells us  
22 there, doesn't it, that both BAA's forecast and your own  
23 surveys suggest that relatively little airport traffic  
24 uses the A120 Bishops Stortford bypass and Little Hadham  
25 to the A10. My understanding of that is that there is

1 an acceptance between us that in overall terms the A120  
2 through Little Hadham and on to Bishops Stortford is not  
3 one of the more important roads to the airport. Indeed,  
4 as we can see here, about 10%?

5 A. Yes. I mean, we are not denying that a lot of -- that  
6 Hertfordshire is the magnet for traffic from the  
7 airport. I mean, a lot of the traffic clearly wants to  
8 go to London and to other parts of the region.

9 Q. Absolutely.

10 A. What is meant by "relatively little" is  
11 that acknowledgment that traffic going into  
12 Hertfordshire along the A120 is not the dominant flow of  
13 movement. Nevertheless it still has a significant  
14 effect on Hertfordshire and in particular on the A120.

15 Q. We will come on and examine that and exactly what the  
16 effect is. I want to get that in proportion.  
17 Paragraph 8.8 tells us that the role played by Stansted  
18 related traffic in contributing to delays and congestion  
19 at Little Hadham and other sections of the A120 is  
20 therefore still being addressed, but the existing  
21 problems at Little Hadham have led the County Council to  
22 bring forward proposals for a single lane bypass to the  
23 village and a further run of the BAA traffic model has  
24 been requested to assess the implications for airport  
25 traffic of such a road.

1           The second point we need to understand, don't w, and  
2           we will examine this later in relation to other  
3           documents, is the Little Hadham bypass is not being  
4           brought forward because of G1?

5   A.   The bypass at Little Hadham is being brought forward as  
6           a result of the traffic conditions that exist in the  
7           village, but the -- it's quite clear from my evidence  
8           that traffic from the airport contributes significantly  
9           to traffic on the A120 and therefore is contributing to  
10          the delay and congestion and environmental impact that  
11          traffic has on the village.

12   Q.   Again, we will come on to that, but we are agreed,  
13          aren't we, that the Little Hadham bypass is not being  
14          promoted -- as I say, we will look at the relevant  
15          reports shortly -- because of G1. It is being promoted  
16          because of existing conditions, of which, as we can see,  
17          relatively little of the airport traffic uses the A120?

18   A.   I agree that it is not solely as a result of G1 that the  
19          bypass has been promoted, but nevertheless in terms of  
20          the priorities that the County Council has in terms of  
21          looking at what road schemes, transport schemes we move  
22          forward with, it will be clear in taking forward the  
23          bypass at Little Hadham that they would have in mind  
24          that there is a large airport to the east of Little  
25          Hadham.

1 Q. Yes. I am not talking about the existing airport. You  
2 know, Mr Humby, I think we can agree this, because if we  
3 can't, then we will have to delve deeply into documents.  
4 Can you just confirm for the inspector that the Little  
5 Hadham bypass is not being promoted because of G1? It  
6 is being promoted in any event because of the existing  
7 problems that exist?

8 A. I would say it's to do with the existing and future  
9 anticipated problems on the route as well.

10 Q. So is it Herts' case, therefore, that one of the  
11 benefits of G1, if approved, is it will provide  
12 justification for the Little Hadham bypass? You see,  
13 I had assumed that we were unrelated and that was not  
14 a benefit of G1, but is it your case that G1 helps to  
15 bring about the Little Hadham bypass? I had thought  
16 not?

17 A. What I am trying to respond to is to try to put in  
18 context the effect that the airport has on traffic  
19 conditions on the A120.

20 Q. I am afraid we will have to look at the officer's  
21 reports in a few minutes then to see exactly what you  
22 told councillors on this issue. The reason for  
23 refusal -- again, we probably don't need to look at  
24 that. It is reason for refusal 6. That, of course,  
25 relates to the need for appropriate mitigation in

1 highway terms and we are agreed, aren't we, on all  
2 aspects of highway mitigation? The only issues is the  
3 size of the contribution to the Little Hadham bypass?  
4 A. Yes. We have reached agreement on a contribution  
5 towards Bishops Stortford, yes.  
6 Q. All physical works necessary to accommodate the traffic  
7 are agreed, aren't they?  
8 A. Well, we have agreed to a contribution that will  
9 ultimately be used to provide physical works and other  
10 matters, but ...  
11 Q. All of those are agreed, aren't they? There is nothing  
12 between us? There is no other junction that you are  
13 concerned about other than those to which we have made  
14 contributions?  
15 A. That's correct.  
16 Q. Now let us just look at the 2003 planning permission --  
17 the 2003 planning obligation, CD/30. Turn, please, in  
18 the obligation, which is the second part of the document  
19 --  
20 A. Sorry. We are on CD/30?  
21 Q. CD/30, which is a document that should look like this?  
22 A. That's what threw me. I have been given CD/30 and 31,  
23 which -- maybe the two documents --  
24 Q. Could Mr Pine give you the 2003 planning obligation,  
25 which I have got.

1 A. Sorry, that's CD/31 in the bundle I have been given.

2 Q. Okay. Turn, please, in that obligation to page 33. The  
3 numbers in my copy are sort of almost cut off, but you  
4 can just work it out?

5 A. Page 33 of 33 on my copy.

6 Q. Do you have on the previous page, 32, something that  
7 says "Fifth schedule"?

8 A. Yes.

9 Q. So let us just look at the two relevant obligations,  
10 paragraphs 7 and 8 from the 2003 section 106. 7 is the  
11 one which relates to highway works, isn't it, and again  
12 I will not read it all out, but the obligation that BAA  
13 was under was to provide sums not exceeding 2 million to  
14 enable ECC or HCC to carry out various highway works?

15 A. Yes.

16 Q. The obligation is sometimes wrongly described as  
17 an obligation for £2 million. It was actually  
18 an obligation for sums not exceeding £2 million.  
19 Obviously the highway authorities, as you will be  
20 familiar with, had to identify and justify schemes which  
21 had highway-related -- that had -- sorry --  
22 airport-related impacts?

23 A. Yes.

24 Q. The obligation in paragraph 8 relates to Little Hadham  
25 bypass, which was an entirely separate obligation. That

1           says:

2           "Not to implement the permission until STAL have  
3           entered into an agreement pursuant to section 278 of the  
4           Highways Act or a memorandum of understanding with  
5           Hertfordshire County Council to carry out works of  
6           improvement to the signal controls at the junction of  
7           the A120 with the unclassified roads at Little Hadham."

8           You remember that?

9    A.   Yes.

10   Q.   It was, of course, pursuant to that obligation, which is  
11       nothing to do with the 2 million, that BAA provided sums  
12       of money to fund the MOVA scheme?

13   A.   Yes.

14   Q.   What we will do in a minute, we will follow that through  
15       in some of the other documents to look at the relevant  
16       officer's reports of the time. I'll leave that for  
17       a moment. You can put aside CD/30.

18           I just want to touch very briefly on a couple of  
19       policy issues with you. Again I hope we will be able to  
20       agree things fairly quickly. In the ATWP, CD/87,  
21       firstly, turn, please, to paragraphs 12.29 and 30 --  
22       I had given myself the wrong reference. 12.19 and 20.  
23       12.19 tells us that responsibility for bringing forward  
24       proposals and securing funding lies with the airport  
25       operator working closely with the Department of

1 Transport, the Strategic Rail Authority, the Highways  
2 Agency and the regional and local bodies.

3 Now in relation to that we know, don't we, that  
4 highway proposals had been brought forward. As we have  
5 said, agreed all physical highway proposals?

6 A. Yes.

7 Q. And the issue of funding simply comes down to the  
8 proportion of funding which is appropriate in relation  
9 to the Little Hadham bypass?

10 A. Yes.

11 Q. Okay. Another short policy that I just want to draw  
12 your attention to, CD/76. Turn, please, to page 146.

13 MR PHILLIMORE: Just for the record, it is the east of  
14 England plan.

15 MR HUMPHRIES: East of England plan. Thank you, sir.

16 I will ignore the text at the top of the page that says  
17 "modified text of RSS". Policy A12, access to airports:

18 "Access to the region's airports will be managed and  
19 enhanced to support development as and when it is  
20 approved and to enable the airports to contribution to  
21 national and regional objectives in relation to economic  
22 growth and regeneration. A peak priority will be to  
23 ensure that airport surface access facilities reinforce  
24 the shift to more sustainable travel through the RTS."

25 We can see there from that, can't we, the Government

1 clearly places importance and weight on surface access  
2 being provided to enable the airports to grow and to  
3 contribute towards national and regional objectives?

4 A. Yes.

5 Q. And we can see from paragraph 7.4.1 -- again, I will not  
6 read it all out, but the last sentence you can see:

7 "Airport developers will be expected to contribute  
8 towards the delivery of such improvements."

9 A. Yes.

10 Q. Again, that's what we are seeking to do. Please, you  
11 know, look over the rest of it. I am not trying to be  
12 selective. I am just trying not to take too much time.  
13 Again, therefore, subject to the Secretary of State's  
14 views on what is an appropriate contribution at Little  
15 Hadham, it is clear that the proposed G1 development  
16 will be in accordance with both national and regional  
17 planning policy?

18 A. My understanding is that G1 forms part of the East of  
19 England plan, yes.

20 Q. Thank you for that. Now the statement of common ground  
21 we have been through a little already and it seems to me  
22 that you and I, having covered it yesterday with  
23 Mr Wang, can largely pass over that. Again there are  
24 a number of areas which we ought to identify where there  
25 is some agreement of the contribution to local road

1 measures within the Bishops Stortford transport  
2 strategy. The proposed contribution is £0.35 million.  
3 That is acceptable, isn't it, to Herts County Council?  
4 A. Yes. I don't have the statement of common ground with  
5 me at the moment.  
6 Q. But you remember it?  
7 A. The figure -- yes.  
8 Q. Could you give us the reference?  
9 MR HUMPHRIES: BAA/21.1.  
10 MR BOYLAND: I meant the internal reference.  
11 MR HUMPHRIES: Sir, I just need to put my hand on the  
12 document. Here it is. It is in the section, sir,  
13 dealing with the operations. I think that's section 4.  
14 Sorry. Section 3.2. It is the paragraph within section  
15 3.2.2 which is numbered 4(b) (ii). It is right at the  
16 bottom of page 8:  
17 "Sum of £350,000 to Hertfordshire County Council as  
18 contribution towards local road measures within five  
19 miles of the airport."  
20 A. I now have a copy.  
21  
22 Q. Bottom of page 8, Mr Humby?  
23 MR BOYLAND: I am not making an issue of it. I just wanted  
24 it for the benefit of my note to save me searching for  
25 it afterwards.

1 MR HUMPHRIES: Mr Humby, as we have got it in our hands now,  
2 the other sum for Hertfordshire that is agreed, if you  
3 turn on to page 9 and we look at paragraph 7, the second  
4 part of paragraph 7, a sum of 1 £150,000 to be  
5 hypothecated for use by the County Council -- that's  
6 Hertfordshire County Council -- towards public transport  
7 measures brought forward as part of the Bishops  
8 Stortford transport strategy.

9 A. Yes.

10 Q. Again that's an agreed sum between us?

11 A. Yes, it is.

12 Q. Thank you. Of course, the allocation of funds, of all  
13 funds we know will have to be in accordance with  
14 circular 05/2005; in other words, it will have to relate  
15 to the development permitted?

16 A. Yes.

17 Q. We will come on and perhaps look at that in a few  
18 moments.

19 Now Little Hadham bypass, let us just touch on one  
20 or two preliminary things in relation to that as an area  
21 of disagreement. Can we just remind ourselves of what  
22 the advice in circular 05/2005 tells us? Look at  
23 CD/117, please. That's the circular on the planning  
24 obligations, and I need you to turn on to page 9, which  
25 is annex B on the planning obligations. That gives the

1 guidance which you will be, I suspect, familiar with.  
2 Paragraph B5 sets out the five tests for planning  
3 obligations, and if we look at paragraph B9, it expands  
4 there on the tests of fairly and reasonably related  
5 scale of the kind to the proposed development and  
6 reasonable in all other respects, those two tests. Let  
7 us just look at what the advice is. It says:

8 "For example, developers may reasonably be expected  
9 to pay for or contribute to the cost of all or that part  
10 of any additional infrastructure which would not have  
11 been necessary but for the development. The effect of  
12 the infrastructure investment may be to confer some  
13 wider benefit on the community, but payments should be  
14 directly related in scale to the impact which the  
15 proposed development will make."

16 So direct guidance there from Government that  
17 although an infrastructure improvement may confer some  
18 wider benefit on the community, in this case existing  
19 airport users, the payment has to directly relate in  
20 scale to the impact which the proposed development will  
21 make; in other words, G1, doesn't it?

22 A. Clearly, it is my view that the development of G1  
23 will -- the impact of the traffic, as a result of G1,  
24 will benefit from the bypass, as well as merely just the  
25 impact of G1 itself. So, therefore, there will be

1 a benefit, a benefit as well to airport users of the  
2 A120 as a result of the bypass.

3 Q. But, Mr Humby, this is, of course, the great divide  
4 between us, and how you get to 2 million and we get to  
5 250,000. We will come to it later, but your calculation  
6 includes benefits to existing airport users, people  
7 travelling to the 25 million passenger per annum  
8 airport, as well as relating to the impact of the G1  
9 development, doesn't it?

10 A. I think in terms of the calculations that we have set  
11 out we have actually looked at both situations, both in  
12 terms of the impact on what you might call existing  
13 users and in the original evidence we put forward we  
14 used a period from 2003 as well, because that was  
15 appropriate at the time that we were having the  
16 discussions.

17 Q. Mr Humby, I can and probably will have to now take you  
18 to them later in the cross-examination. You tell us in  
19 numerous places in the evidence, and we can seize it in  
20 the calculations, that to arrive at your 10% you include  
21 the benefits to all airport users, not just G1. Now  
22 I would like to get a simple answer to that. That may  
23 shorten things later. If you don't want to agree with  
24 that, then we will go through it in detail, I am afraid.

25 A. My point is my belief that the bypass will be of wider

1 benefits to both users of the airport and also to, for  
2 example, bus and coach users directly related to the G1  
3 application as well. So there are a wider range of  
4 benefits to the airport of the bypass that I believe  
5 should be taken into consideration.

6 Q. We can see, though, in that regard that the guidance  
7 from Government is on such payments, that although there  
8 may be wider benefits to the community, the payments  
9 should be directly related in scale to the impacts which  
10 the proposed development will make. You do understand  
11 that?

12 A. I understand what the circular is saying, yes.

13 Q. That maybe then becomes a matter for submission. Let us  
14 just go on then and just consider the 15 plus  
15 application. Can you look at CD/29? CD/29 was  
16 an addendum to the 2002 application environmental  
17 statement. The particular addendum passage that I want  
18 to look at relates to Little Hadham bypass. Can you  
19 turn to page 64? It is extremely difficult to find.

20 A. On the copy I have not every page has a page number.

21 Q. I am just beginning to doubt myself. Sorry. I have  
22 given you one document reference and then looked at my  
23 notes at a page reference from another document. That's  
24 a very good reason why we can't find the paragraph.  
25 I do apologise. It is paragraph 4.29. If it's any

1 consolation, I did mislead myself as well.  
2 Paragraph 4.29, which is on transport, which is page 51.  
3 The section that we are going to look at starts, in  
4 fact, at the very bottom of page 50, which was the route  
5 assessment of the A120 west of the airport.

6 Paragraph 4.29 tells us that:

7 "Other sections of the route operate satisfactorily  
8 for most of the day. However, traffic is liable to  
9 queue during peak periods at the signal control junction  
10 at Little Hadham, eight kms to the west of the airport.  
11 Surveys undertaken during March 2000 suggest that queues  
12 in the region of 1 km can form eastbound on the AM peak  
13 and westbound on the PM peak. Delays of between five  
14 and ten minutes are observed at these times in the  
15 direction of peak flow. Analysis using OSCADY shows  
16 that further optimisation of the cycle and green times  
17 would ensure that delays of queues would be no worse  
18 than those experienced today. Although not required by  
19 the additional airport traffic, MOVA,  
20 microprocessor-optimised vehicle actuation control, may  
21 improve the operation of this junction still further."

22 So that was the advice that was being given to  
23 Uttlesford and to the County Councils at the time,  
24 wasn't it? Do you recall?

25 A. Yes. I mean, I must say I have not -- I am not directly

1 familiar with the detail.

2 Q. Let us then pick up what Uttlesford did with this.

3 CD/27. That's where the page 64 comes in. CD/27,  
4 page 64. Look, please, at paragraph 110. That tells  
5 us -- this is the officer's report:

6 "The A120 west of the airport will see a 10%  
7 increase in traffic by 2010, about 60% of the increase  
8 being airport-related. This will increase delays at  
9 Little Hadham signal control junction. There is scope  
10 to ensure that the delays are no worse than they are  
11 today by installing intelligent signal control to  
12 balance the flows better. BAA is prepared to fund its  
13 installation."

14 Now it was that, wasn't it, which led to that  
15 obligation that we looked at in the 2003 planning  
16 obligation that we would fund MOVA signal control lights  
17 at Little Hadham?

18 A. Yes.

19 Q. And, of course, the funding, as you say, was paid for  
20 that, wasn't it?

21 A. I think we ultimately ended up, through a memorandum of  
22 understanding, with two potential mechanisms that BAA  
23 agreed to provide £50,000 towards the cost.

24 Q. Yes, and the MOVA system was installed?

25 A. Yes.

1 Q. And the 2003 mitigation from 15 MPPA airport to a 25  
2 MPPA airport has been discharged, hasn't it? We  
3 followed it through in the ES. We followed through what  
4 the officer's advice was. We have considered the  
5 obligation that was imposed on BAA and we know that the  
6 money was paid and the system was installed?

7 A. Yes. I would say that clearly at that time the bypass  
8 was not -- the bypass had not progressed to the position  
9 it is in today and, therefore, we were looking at what  
10 might -- as I have indicated, a short-term solution.

11 Q. Yes?

12 A. And that was proposed as a way forward at that time.

13 Q. Yes, but, Mr Humby, nowhere -- and we can go back over  
14 it, if you want -- in any of that contemporaneous  
15 documentation is BAA told that it was contributing to  
16 a short-term solution. Both the technical advice, the  
17 officer's report and the sums paid was to mitigate for  
18 the impact of a 25 million airport, wasn't it?

19 A. What I am saying is at that time --

20 Q. Can you just answer the question first? Sorry,  
21 Mr Humby. So the inspector has a note of it. Nowhere  
22 in any of that documentation is it ever suggested that  
23 the MOVA lights are simply a short-term solution. What  
24 is consistent throughout the documentation is that that  
25 mitigation was to mitigate for the effects of a 25

1 million passengers per annum airport.

2 A. What I am saying is that at that time, in order to deal  
3 with the increase in congestion at that junction, that  
4 improving the efficiency and effectiveness of the lights  
5 was an appropriate solution. At that particular time  
6 there was no immediate prospect of the County Council  
7 bringing forward the bypass.

8 Q. But the inspector needs to recognise, does he not, that  
9 by now asking for further contributions to mitigate for  
10 the effects of the airport not just from 25 to 35 but  
11 for the airport up to 25, what the County Council is  
12 seeking is double mitigation. We have already  
13 discharged the obligation. What you want is another lot  
14 of money for another project.

15 A. No, I think what I am saying is that the improvement of  
16 the operation of the traffic lights dealt with -- deals  
17 with the impact of the additional traffic on that  
18 section of the A120 at that time.

19 Q. Yes.

20 A. What I am saying is that a bypass clearly would also  
21 benefit traffic that doesn't currently use the A120. It  
22 may transfer to the A120. Your own figures show there  
23 will be an increase in the use of the A120 for all  
24 traffic if the bypass goes -- when the bypass goes in  
25 and clearly the bypass would be a benefit to the

1 airport. That's ...

2 Q. Mr Humby, this is the point that the Government  
3 expressly advises against, which is where  
4 an infrastructure project brings wider benefits to the  
5 community.

6 A. I recognise the bypass will bring wider benefits to the  
7 community. What I am saying is that there will be -- it  
8 would also bring benefits to traffic going to the  
9 airport that doesn't currently perhaps use the A120, not  
10 necessarily taken account of in the increase in delay at  
11 the A120 at the traffic lights in 2003. That's the only  
12 point I'm trying to make.

13 Q. All right. Sir, that's probably a convenient moment.

14 MR PHILLIMORE: It is, yes. It is 1 o'clock. We will  
15 adjourn until 2 o'clock. Thank you.

16 (1.00 pm)

17 (Luncheon adjournment)

18 (2.00 pm)

19 MR PHILLIMORE: Good afternoon. We are now resumed.

20 Mr Humphries?

21 MR HUMPHRIES: Mr Humby, good afternoon. We were just  
22 talking about Little Hadham and the bypass. We talked  
23 a little about the 2003 mitigation package. I just  
24 wanted to ask you a couple of questions on a couple of  
25 points relating to the MOVA system itself. The MOVA

1 system is, I think, what's called a dynamic traffic  
2 signal system, is it not? It is able to respond to flow  
3 levels.

4 A. Yes, as -- we assume what MOVA means --

5 Q. You need to turn on your microphone.

6 A. Sorry. I think what MOVA does is it sort of optimises  
7 the signal settings to respond to the actual traffic  
8 demand on the junction and tries to, if you like, share  
9 out the time in an efficient way in terms of operating  
10 the traffic signals, gentlemen.

11 Q. I think we can agree what the operators do, what the  
12 County Council has to do, is set up the basic cycle with  
13 which MOVA works. For example, I think at one time the  
14 Little Hadham traffic signals worked on a cycle that had  
15 four -- sorry -- six stages. There was a westward  
16 movement, a eastward movement, a northward movement,  
17 another westward movement, another eastward movement and  
18 then a southward movement. So the MOVA system operates  
19 dynamically, but the County Council sets up the basic  
20 phasing?

21 A. Yes. I mean, we have tried -- we have obviously tried  
22 a number of different ways of operating the traffic  
23 signals there and the issue for the County Council is,  
24 if you like, trying to balance the usage of the A120  
25 with the delays that occur on the side roads, because

1 obviously they do provide benefit to the local area.  
2 Really you are just trying to set the system up in a way  
3 that tries to get the maximum throughput through the  
4 junction, recognising it will have a finite capacity.

5 Q. And what has happened and, you know, if you like, we can  
6 look at it in one of the recent officer's reports,  
7 CD/442 -- we may not need to. That was an officer's  
8 report from earlier this year that you explained you  
9 were making another change to the MOVA system again to  
10 try to optimise the flows in the way that you want to,  
11 balancing north/south flows against east/west flows. Do  
12 you want to look at that?

13 A. It may be useful just to be reminded. There has  
14 recently been -- yes, this is a report to the joint  
15 member panel.

16 Q. That's the one.

17 A. I mean, essentially what drew our attention here was  
18 that --

19 Q. If you look at the conclusion just at paragraph 5.1,  
20 just so the inspector can see it, it says:  
21 "Analysis of the traffic signal assessment data and  
22 completion of a report on these investigations to  
23 optimise performance of these traffic signals programmed  
24 to be undertaken in the year 2007/2008".  
25 My understanding, as I think you confirmed just now,

1 is that this has happened a number of times since MOVA  
2 was installed. The County Council has, you know,  
3 changed the settings to achieve what it is, you know,  
4 the balance you want between north/south and east/west?

5 A. In relation to this particular report, this is a report  
6 to our local joint member panel, and this is in response  
7 to local issues raised by residents within Little Hadham  
8 to ask the area district manager to investigate whether  
9 there could be -- whether the signals could be altered  
10 particularly because some of the local people were  
11 concerned about the delays that they were experiencing.  
12 My understanding is that -- and this refers to work  
13 being done -- I think my understanding is that since  
14 this report was written, the technical assessment has  
15 come through, which they have considered and, in fact,  
16 the view was taken that the lights were operating at  
17 about the best they can at the moment, if you like. In  
18 fact, no alterations had been made to the settings of  
19 the lights as a result of this, because clearly --

20 Q. Mr Humby, not controversial between us.

21 A. No.

22 Q. The simple point I am making to you is, as you confirmed  
23 to me just now, from time to time the county do make  
24 changes to the system?

25 A. Yes, both in terms of how it operates and making sure

1           that we are using the most up-to-date and efficient  
2           equipment, yes.

3    Q.   The point -- we will come to it later -- about the AA3M,  
4           and the revised signal timings, is when BAA was  
5           constructing the model, it put in for the lights at  
6           Little Hadham one set of settings of what it understood  
7           at that time were the cycle times and numbers of stages  
8           per cycle that the County Council was using and,  
9           clearly, no criticism at all.  The settings have changed  
10          since then.  What you have at BAA 3F is simply what the  
11          model then forecast with the latest settings, which the  
12          BAA team have been out and actually done observations on  
13          the ground to confirm the current phasings on the  
14          lights.  So we can, I think, agree, can't we, that the  
15          model in that respect, in relation to the Little Hadham  
16          lights, simply reflects what settings you put into it?

17    A.   Yes, but the reason that we drew this -- drew attention  
18          to this was that the model predictions for 2014 were  
19          indicating less traffic than the model was predicting  
20          for 2003, and that led me to question how the model had  
21          been set up for 2014.  Clearly you have altered -- the  
22          result of this document suggests you have altered the  
23          settings in the traffic model and it has now produced  
24          increased flows on the A120.

25    Q.   We will come to that later.  Obviously, had you raised

1           this point earlier than in your supplementaries so that  
2           we got last Thursday, we could have adjusted the  
3           settings earlier. Again, it is not a criticism, but  
4           that is how it has arisen in this particular timescale.

5    A. Well, we questioned the performance of the traffic model  
6           in relation to the A120 at Little Hadham some time ago.  
7           It is one of the issues that's raised -- was raised in  
8           the joint position statement. We did seek information  
9           on the detailed operation of the traffic model in terms  
10          of how the junction had been modelled of the traffic  
11          model.

12   Q. I think what had not been understood -- and in a sense  
13          nothing now turns on it -- was that the signal settings  
14          had been changed. It wasn't until that was done that  
15          the model was changed.

16   A. Well, I can't -- without the detail in front of me  
17          I can't indicate at what time the settings that are  
18          currently being used at the junction, when those were  
19          instigated.

20   Q. All right?

21   A. It may have been -- certainly it may have been before  
22          this report came out, because, as I indicated to you,  
23          the outcome of this piece of work, my understanding is  
24          that the signal settings have not been changed. So it  
25          may be that those settings have been there for some

1 time. I understand that you have now measured -- you  
2 have now actually measured the settings and taken those  
3 into account.

4 Q. All right. Mr Humby, we need to come back to that later  
5 in a slightly different context, but let us move on.  
6 The proposals, of course, for the Little Hadham bypass  
7 are very long standing, aren't they, if we go back to  
8 the 1970s?

9 A. The provision of a bypass at Little Hadham has been  
10 an option for dealing with the traffic problems at  
11 Little Hadham for some time, albeit that its priority  
12 has changed over the years. I wouldn't like to say  
13 that -- I think, as has been indicated, that the scheme  
14 has been developed since 19 -- we have been sitting  
15 since 1978 with the scheme trying to progress that  
16 forward. The priority given to it will be affected by  
17 a number of things. For example -- can I just say over  
18 the years there have been the possibility of more  
19 strategic links being put forward either through  
20 multi-modal studies or through other initiatives by  
21 Government that have meant that on occasions it has not  
22 been reasonable for us to -- in terms of providing  
23 a bypass it has not been our highest priority, because  
24 there was an opportunity of other schemes coming  
25 forward. As it happens, we have now reached the stage

1           where it is clear there is a need to move forward with  
2           the project.

3    Q.   Now let us look at CD/439.  This is the report on the  
4           Little Hadham bypass.  We can see in paragraph 3.1, just  
5           to go to the end result, that the recommendation was  
6           that option 5 be adopted as the preferred route.  Was  
7           that recommendation carried?

8    A.   Yes.

9    Q.   "Cabinet was requested to", paragraph 3.2, second bullet  
10           point, "authorise various statutory processes including  
11           planning permission, side road orders and compulsory  
12           purchase orders."

13   A.   Yes, it gives authority for the director to proceed with  
14           them, yes.

15   Q.   If we go on through the report to page 5,  
16           paragraph 10.1:

17                 "The traffic modelling tells us that the east of  
18           England regional highway assignment model has been used  
19           to test the strategic effect of the Little Hadham bypass  
20           options -- the model has been developed by consultants  
21           Faber Maunsel.  The model has been used to evaluate a  
22           number of Highway Agency projects and is also  
23           contributing to BAA Stansted Airport's work."

24                 The model you used, therefore, to assess the need  
25           for the Little Hadham bypass is exactly the model which

1           you are telling the inspector is one of those that has  
2           uncertainties.

3    A.   I don't know that I would say it's exactly the model.

4    Q.   Well, it is exactly the model.

5    A.   Because -- well, my understanding is that, if you like,  
6           it's the core model of the regional model has been used,  
7           but we have employed consultants to look at it in  
8           relation to Little Hadham bypass, we have ensured that  
9           the model is adjusted to take account of -- to ensure it  
10          is properly replicating matters here. It has purely  
11          been used to derive -- put the bypass in strategic  
12          context. It has not been used to produce all of the  
13          detailed analysis of the traffic at Little Hadham.

14   Q.   If we look over the page, paragraph 10.2, we can see how  
15          you have used the model:

16                 "Planning data for the draft east of England plan  
17                 incorporating the proposed Secretary of State  
18                 modifications announced in December 2006 has been based  
19                 for the background growth assumptions. It has been  
20                 assumed that Stansted will have one runway and will have  
21                 a total throughput of 25 million by 2011 and 35 million  
22                 by 2026."

23                 Now bearing in mind, Mr Humby, that paragraph 16.5  
24                 on page 9, the construction window is about 2013 to  
25                 2015, we can see, can't we, despite what you told the

1 inspector earlier, this bypass has not been planned on  
2 the basis of the G1 development, which is 35 million in  
3 2014. This assumes 35 million in 2026. Now would you  
4 like to just revisit that earlier answer, Mr Humby?  
5 I put the point to you again. I said, to try to give  
6 you an opportunity to answer it in a simple way earlier,  
7 the officer's report makes it very clear that the Little  
8 Hadham bypass is not being promoted to accommodate the  
9 G1 traffic, is it?

10 A. My understanding of what paragraph 10.2 is saying is  
11 that clearly, in looking at the design of the bypass, we  
12 need to look at future years ahead.

13 Q. Mr Humby, that's not actually what I have asked. What  
14 I put to you is that the Little Hadham bypass isn't  
15 being promoted because of G1, it is not being promoted  
16 on the basis that the Secretary of State will grant  
17 permission for G1 and that the traffic flows we are  
18 looking at in all of the TA and TA addendum update  
19 documents will exist in 2014.

20 A. As I say, my understanding of this is there are  
21 particular model year runs that we can draw from, from  
22 this the east of England model and these are the  
23 assumptions that are in those years.

24 Q. What is very clear from paragraph 10.2 is, in fact, the  
25 future traffic growth that Herts County Council is

1 concerned about is the background non-airport growth  
2 derived from the draft east of England plan, including  
3 Secretary of State modifications, isn't it?

4 A. The County Council is concerned about all of the  
5 developments that are contributing towards future  
6 traffic growth on that corridor.

7 Q. Mr Humby, I keep asking questions and you keep answering  
8 slightly different questions. Are you going to agree  
9 with me that the Little Hadham bypass is not being  
10 promoted in order to accommodate the G1 traffic or is it  
11 going to be a matter on which I have to make  
12 submissions?

13 A. What we are saying is that it is not being developed  
14 solely on the basis -- as I said to you this morning it  
15 is not being developed solely on the basis of the G1  
16 traffic.

17 Q. I will pass on. Paragraph 11.1 tells us:  
18 "The DFT guidance on value for money indicates  
19 a benefit cost ratio (BCR) greater than 2 representing  
20 high value for money. Subject to affordability and  
21 regional prioritisation, DFT will fund most high value  
22 money schemes."  
23 So what's anticipated, and we will look at it a bit  
24 later, is that the scheme will be DFT funded, isn't it?

25 A. The funding mechanism for major projects such as this is

1 through what's known as the regional funding allocation.  
2 That's a mechanism through which a County Council will  
3 seek funding.

4 Q. We will come on to consider that, because you do discuss  
5 alternatives in the document. We can seize from  
6 paragraph 11.1 that a cost benefit ratio of 2 represents  
7 a high value for money. We can see for option 5, in  
8 fact, option 5, as indeed with the other options, have  
9 very, very high value for money benefit cost ratios,  
10 don't they?

11 A. Yes.

12 Q. As you are probably well aware, the Government will  
13 often fund projects that have BCRs of about 1.7, won't  
14 they, which are good value for money?

15 A. What this report is suggesting is that the bypass will  
16 be good value for money, yes.

17 Q. And that is the criterion, is it not, against which the  
18 Government funds projects?

19 A. That's -- it is one of the criteria. What I was trying  
20 to say earlier was that the Government funding, where it  
21 talks about DFT funding, will be through what's known as  
22 the regional funding allocation. That's how schemes  
23 through DFT funding -- that's the route that the County  
24 Council now takes, has to take in order to fund projects  
25 like this. That fund -- there is an element of

1           prioritisation of how that fund, that will need to be  
2           made by Government, as to how that fund is utilised.

3    Q.   Then paragraph 13.2, further advice:

4            "It is probable that the majority of the resulting  
5           scheme will be funded through traditional DFT capital  
6           grant secured through the LTP process.  However, the  
7           feasibility of funding the scheme from alternative  
8           sources such as TIF, CIF, JAF, PFI and third parties  
9           will also be explored as part of the business case  
10          preparation."

11          So the expectation is the scheme will be DFT funded,  
12          but that alternatives are being explored, aren't they?

13    A.   It's reasonable for us to consider all funding,  
14          potential funding opportunities.  Clearly the ones that  
15          are referenced here are those that may be available to  
16          us.  Their availability and whether they comply and meet  
17          the timescale we are talking about may well be -- will  
18          be a matter that we would have to take into account.  
19          So, for example, if I may use this, there is reference  
20          there to CIF.  The current funding mechanism in CIF  
21          requires us to spend -- to have the scheme up and  
22          running within the next two years.  In this case that  
23          clearly isn't an opportunity.  It is not unreasonable  
24          for us to look at different funding opportunities.  They  
25          may not all be available to us at the time.

1 Q. That phrase is one that echoes, of course,  
2 paragraph 16.2, the first bullet point at the top of  
3 page 9:  
4 "Next steps. One of the things to do is to prepare  
5 the business case and identify funding contribution  
6 opportunities."  
7 That's what you regard G1 as, isn't it, a funding  
8 opportunity?  
9 A. As I say, at a previous meeting of the panel the County  
10 Council in the resolution of the panel, the panel did  
11 ask, as I have indicated I think in my evidence, to seek  
12 a contribution from BAA. So clearly we were looking at  
13 a number of different opportunities, funding  
14 opportunities here.  
15 Q. Nowhere in this document does it anywhere suggest that  
16 the need for the bypass has anything at all to do with  
17 the G1 project. You just confirmed that factually?  
18 A. The G1 project is not referred to in the report.  
19 Q. Nor in HCC/1/C, appendix 3, the consultation document,  
20 nor in that document anywhere is it suggested that the  
21 need for the Little Hadham bypass arises from the G1  
22 project.  
23 A. Not specifically in that document, no.  
24 Q. Not specifically in that project. It is just a point  
25 not made, is it?

1 A. No, what I have said to you is that in earlier reports  
2 to the highways and transport panel when they were  
3 considering the development of the Little Hadham bypass,  
4 then the panel made a resolution that funding --  
5 a contribution towards funding should be sought from  
6 BAA, recognising that the airport did have an impact on  
7 the section of the A120.

8 Q. Mr Humby, I don't doubt for a moment that the County  
9 Council have passed resolutions saying they want  
10 contributions from BAA. The point I am making is that  
11 nowhere in any of the documentation is it suggested even  
12 vaguely that the need for the Little Hadham bypass has  
13 anything at all to do with G1. The need arises because  
14 of existing flows and projected regional growth.

15 A. I thought we indicated earlier that the growth of the  
16 airport was part of the east of England plan.

17 Q. Mr Humby, you know, because paragraph 10.2 in this  
18 document tells us, that you have separately modelled the  
19 regional growth and the airport growth -- I will put the  
20 point to you again. There is nothing, is there, in any  
21 of this documentation that you can point to that  
22 demonstrates that the need for the Little Hadham bypass  
23 arises because of G1. It is being promoted in any  
24 event. If G1 is refused, you would still want Little  
25 Hadham bypass, wouldn't you?

1 A. I accept that, yes.

2 Q. Thank you. Now when we look at Mr Forshew's BAA/3/E,  
3 and we look at the annex, annex A --

4 A. This is Mr Forshew's supplementary --

5 Q. Correct, which is page 24. We can see that in  
6 tables A3, for the AM peak flow, and table A4, for the  
7 PM peak flow, comparing in both cases flows with the  
8 bypass, that in the 35 MPPA case plus 15%, there will be  
9 an additional 27 airport-related movements over the 25  
10 MPPA case in the AM peak and 25 in the PM peak.

11 A. Yes.

12 Q. Now, in fact, it is thought there will be, between those  
13 two cases, some redistribution, some reduction in  
14 non-airport-related flows, but what Mr Forshew has done  
15 is not look at that countervailing reduction in  
16 non-airport flows, he has taken the full 27 additional  
17 movements and compared that with the flows in the 35  
18 case to derive his 1.2% for the AM peak and his 1.3% for  
19 the PM peak, giving him an average of 1.25.

20 A. But what that -- in doing that calculation in both the  
21 25 and 35 case he has assumed that the bypass is in  
22 place.

23 Q. Correct.

24 A. But --

25 Q. Because he is examining the impact of G1 on the bypass.

1 A. What I would say to that is that if one looks at the  
2 figures looking at 35 million with no bypass, then you  
3 get considerably less traffic on the A120,  
4 airport-related traffic on the A120.

5 Q. Mr Humby, we are going to come on and examine what you  
6 have done, but the reason that you get to your higher  
7 percentages, of course, is that you compare, amongst  
8 other things, the 25 MPPA case without the bypass  
9 against the 35 MPPA case plus 15% with the bypass, so  
10 that you get the effect not just of G1 but also  
11 redistribution of existing 25 MPPA traffic. When the  
12 bypass is put in, existing traffic, airport traffic  
13 moves on to the bypass. That's what you have done in  
14 your later tables -- we will come to examine it -- have  
15 you not?

16 A. I have done that because I feel it is appropriate to  
17 take into account the benefit that the bypass will bring  
18 to airport-related traffic.

19 Q. I understand that. I do understand that. Now you  
20 identify in your proof -- we will come back to the  
21 calculation and how you have done it, but you identify  
22 in your proof four forecasting uncertainties. I am  
23 going to deal with each of them in turn. We need too  
24 look at your proof, which is HCC/1/D. We will start  
25 with paragraph 2.1. We will examine to what extent, if

1 any, these are good points. The first point you make in  
2 paragraph 2.1 is to note that the new forecasts with the  
3 TA addendum update show lower total traffic flows in  
4 2014 and 2023 than did the original TA forecasts. Now  
5 can I get you, first, to look at CD/14.2? That's the TA  
6 addendum update. Look, please, with me at figure 5.1.  
7 I want to draw your attention first to the key, so we  
8 can see what these particular flows are. We are looking  
9 at 2023 core network scenarios, and the top two rows are  
10 as follows. The first row, the first two boxes, are the  
11 original TA data. Then what the modellers did to try to  
12 separate out changes at the airport from changes to the  
13 background non-airport data, they updated the airport  
14 demands in accordance with the TAAU, but they left the  
15 non-airport demands as per the original TA; in other  
16 words, the old planning and other data. What that shows  
17 us when we look at those top two black rows in each of  
18 the boxes is that on the whole the change to the  
19 airport-related data from the TA to the TAAU makes very  
20 little difference. It does make some, but when we look  
21 at the boxes, it actually makes very little difference.  
22 Nothing in many cases, 10 in some others. When you look  
23 at the M11 south of the airport, you get some bigger  
24 figures, but those, of course, are on the M11.

25 Now we can conclude, can't we, from that, Mr Humby,

1           that the changes, when you say there have been drops in  
2           the forecast in the TAAU, those drops relate to  
3           non-airport traffic, subject to the very minor changes  
4           we observe in these top two rows?

5   A.   Yes.  It's referring to -- the general point here,  
6           I think, is if one looks across the diagram, is that the  
7           figures in black are generally higher than the figures  
8           in green and the figures in green are those that have  
9           come from the TAAU model.

10  Q.   Yes, but the second row, remember, is half TAAU.  It is  
11           the airport-related TAAU demands, the TA non-airport  
12           demand.  What that tells us is that when we look at  
13           those green rows, the change to the drop is not because  
14           the airport traffic has reduced.  It's the non-airport  
15           traffic.  That's why this was done.  Do you understand  
16           that?

17  A.   I understand the point you are making, yes.

18  Q.   We examined with Mr Wang yesterday why that might be the  
19           case.  Do you remember we looked in his appendix E of  
20           ECC/1/H?  The difference in the distribution of regional  
21           employment and housing growth in the original draft of  
22           the east of England plan, which was in the TA, as  
23           opposed to the Secretary of State's changes.  The point  
24           was put that there was greater balance.

25           Now, Mr Humby, in that context there is nothing

1 surprising, is there, that the TAAU figures should  
2 decline? Indeed, that is wholly intuitive. It is  
3 common sense that they ought to decline, isn't it?

4 A. That would be true, I think, if it was only -- the only  
5 reason for the difference here. I would also say in  
6 relation to the point that was made, this issue of the  
7 balance, whilst I assume what you are saying is if you  
8 balance employment and population or housing, that  
9 people will tend to live and work closer together.

10 Q. As an average?

11 A. Indeed, that provides that opportunity, but that doesn't  
12 necessarily mean to say that people will take that  
13 option up. I mean, for example, Hertfordshire is  
14 a complex series of towns where there's a lot of  
15 movement between towns even though the towns themselves  
16 may be imbalanced.

17 Q. That's exactly what the model you used for the Little  
18 Hadham bypass, the east of England model. That's the  
19 sort of things it does. You put in, as you told us  
20 there, the east of England growth forecasts and you work  
21 out what the regional highway network demand is. That's  
22 what we have done. That's what you have done. It is  
23 correct to do that, isn't it?

24 A. Obviously the TAAU uses the version of the regional  
25 modelling, the TA uses the most recent planning data,

1           yes. That's logical to use that.

2   Q. The point I am putting to you, you put this forward as  
3       some uncertainty in the model. It is not an uncertainty  
4       in the model. It is a reflection of better balance in  
5       spatial planning for the east of England, isn't it?

6   A. Well, that may be contributing to it. I don't disagree  
7       with that, but what I would say is that the growth in --  
8       the changes in -- if one looks at the changes in  
9       employment and population as a result of the east of  
10      England plan, whilst they are significant, they are  
11      relatively small in comparison to the totality of  
12      population and employment distribution across the  
13      region. So, therefore, changes to the policy -- what I  
14      am saying is changes in relation to the additional  
15      development that is being proposed in the east of  
16      England plan may well move towards a more sustainable  
17      movement pattern, but it will be in the context of  
18      a much wider level of employment and population that  
19      already exists.

20   Q. Mr Humby, perhaps we can leave it here. We have had the  
21      discussion on the fitness for purpose of the regional  
22      model. We can note that Herts County Council itself is  
23      using the regional model and Herts County Council  
24      doesn't present to the inspector or the Secretary of  
25      State any alternative analysis showing higher or indeed

1           any other flows than those in the BAA data. This is all  
2           simply just you suggesting uncertainties. No  
3           alternative data, is there?

4   A. It is not -- the context within which the information  
5           has been presented is in terms of a transport assessment  
6           for a development. It is the normal County Council  
7           policy -- approach, sorry, to consider the transport  
8           assessment that has been put forward by a developer and  
9           to test its --

10   Q. With respect --

11   A. Sorry. If I could finish. It is not our task to, in  
12           the case of every development, come forward with its own  
13           set of traffic forecasts for the development. It is not  
14           inappropriate for us to take into account the TA that  
15           has been submitted and consider its robustness. That's  
16           our job.

17   Q. Yes, but the uncertainty you point to is not in any way  
18           quantified, is not in any way justified by reference to  
19           the figures. No explanation is given as to why you say  
20           this is an uncertainty. You just say the figures have  
21           gone down. There must be something wrong with the  
22           model. There is nothing more than that, is there?

23   A. Well, we are noting that the figures -- we are noting  
24           the general point here that the figures have gone down.

25   Q. All right. Now, the next uncertainty you point to is

1 from paragraph 2.4 onwards. This is the one we touched  
2 on a bit already. It is to do with the traffic lights,  
3 the traffic signals at Little Hadham. We can see from  
4 table D 1, which is forecast flows, and table D2, which  
5 is observed flows, that the 2003 forecast and the 2003  
6 observed correlate very closely. I ask you to look  
7 at -- because we are interested in A120 east of Little  
8 Hadham -- total flow for 2003 at 1333. Do you see the  
9 figure?

10 A. Yes.

11 Q. That's the forecast. If you look at the observed in  
12 table D2, the equivalent figure is 1311. So the model  
13 is validated very well against the observed flow. What  
14 happened, however, in the future, because, of course, in  
15 2003 MOVA wasn't there, is that the settings we had  
16 understood applied were applied to MOVA were put into  
17 the model, which gave greater priority to the  
18 north/south movement and lower priority to the east/west  
19 movement, constraining the flow always to about -- well,  
20 between 1230 and 1240, which is why the flow it  
21 always -- that's what the signals were assumed to let  
22 through. As you rightly point out, changes to the  
23 signals have allowed greater flows through, haven't  
24 they? We can see that in the observed?

25 A. Yes, and clearly we are recording traffic that's in

1 excess of 1338, yes.

2 Q. Don't let me cut you off.

3 A. The point that I am making -- that is made is that in  
4 the TAAU -- I am accepting that the model appears to  
5 validate well at 2003. The point that I was making was  
6 that in the TAAU figures beyond 2003, in 2014 the total  
7 traffic flows in the model have gone down, which I say,  
8 first, is counterintuitive.

9 Q. That's the last point we dealt with.

10 A. Can I just make the point? Sorry. Secondly,  
11 a reduction such as this wasn't demonstrated in the  
12 equivalent TA figures. Now perhaps -- I can't comment  
13 on how the traffic lights were modelled in the TA as  
14 compared to how they were modelled in the TAAU. Maybe  
15 that's something that we can be provided with, but as  
16 far as the TA was concerned, the model appeared to be  
17 allowing more traffic along the A120 than the TAAU  
18 model.

19 Q. Now what we have done in BAA/3/F, as the note on the  
20 front says, is to go out and observe the signals which  
21 now operate with four signal stages and an overall  
22 maximum cycle time of 5 minutes 40 seconds. That has  
23 been put into the model and you get these flows. What  
24 you get -- we can look at figure 1 in that document --  
25 are, as you would expect, higher flows along the A120,

1           because the traffic signals now allow rate of flows to  
2           pass along the A120. Of course, that produces some  
3           redistribution -- if you look at figure 2 -- in that, as  
4           we can see, along the A120 from the A10 to Bishops  
5           Stortford you get a wider red band, as you would expect.  
6           That's the purpose, isn't it, of improving the signal  
7           settings?

8    A. Well, it's interesting to note that it's only -- the  
9           band is much thicker in the east bond direction than the  
10          westbound direction.

11   Q. Yes. That's because it's the AM. There are more people  
12          going towards the motorway than away from the motorway?

13   A. I think it is more than that, because if one looks at  
14          table D1, then if one looks at the westbound flows, then  
15          the westbound flows increase from 2003 to 2014, but the  
16          eastbound flows are not. So clearly there is something  
17          not happening correctly here.

18   Q. Mr Humby, what this is showing is just the change from  
19          introducing the signal settings. Now this is not  
20          a change -- these green and blues are nothing to do with  
21          G1. The greens and blues are the results of changes in  
22          the signal settings. Hertfordshire County Council  
23          could, of course, change the signals again in future,  
24          couldn't they?

25   A. We are not proposing to, as I indicated before. We

1 think they are working well.

2 Q. No, and what happens by those optimised signal settings  
3 is you have chosen to put more traffic along the A120.  
4 Yes?

5 A. Sorry. I have chosen to put more traffic along the  
6 A120?

7 Q. By optimising the signal settings in the traffic lights  
8 to prioritise the east/west movements, you are choosing  
9 to increase flows along the A120 at the expense of the  
10 north/south routes?

11 A. No, what I am saying is -- what I am saying, we seek to  
12 optimise the balance between the two.

13 Q. All right. You optimise the balance, but the effect of  
14 that is you get greater flows east/west?

15 A. My concern, I think, is towards the way the TAAU model  
16 was performing compared to the TA model at this  
17 location. Now you have indicated to me a reason why the  
18 model might have been producing low flows. You have  
19 indicated to me that you may have modelled the junction  
20 in a way that it is not currently operating. I don't  
21 have the details to know when the model -- when the  
22 settings that you have included in your model were  
23 relevant at Little Hadham. I have indicated surprise  
24 that the TAAU model was producing a reduction in flow  
25 when the TA model wasn't showing that effect.

1 Q. Mr Humby, now let us put that aside. The effect of the  
2 signal settings being as they are is that they allow  
3 greater flows east/west along the A120 than had been  
4 assumed by BAA?

5 A. Than was assumed by BAA in the model, yes.

6 MR PHILLIMORE: I think that will probably take us back  
7 round in a circle again. You can probably move on from  
8 that now.

9 MR HUMPHRIES: Well, there are a couple more points. What  
10 is also shown on the diagram is if you do that where the  
11 traffic reassigns from -- and you can see that in the  
12 green flows, and again the model produces intuitive  
13 results, doesn't it? Some traffic that might have  
14 travelled south from the junction of the A10 and the  
15 A120, south to Ware and then come up to Bishops  
16 Stortford along the B1004 doesn't now travel south on  
17 the A10. It goes along the A120, and some traffic that  
18 from Buntingford might have gone across country to the  
19 motorway and down towards the airport doesn't now do  
20 that. It goes down the A10 and again eastwards along  
21 the A120.

22 A. Are you suggesting that traffic travelling south on the  
23 A10 from Buntingford would go south -- would pass the  
24 A120 junction, go all the way down the A10 to Ware and  
25 then turn left and come all the way up to the B1004 to

1 Bishops Stortford? I may have misunderstood you.

2 Q. You have. Traffic that previously would have gone from  
3 Buntingford or other locations and down doesn't. It  
4 relocates now on to the A120.

5 A. That may be going beyond Ware. Is that what you are  
6 saying?

7 Q. Mr Humby, we have tried to sort of explain to you as  
8 clearly as position. Mr Forsheew can deal with it, if  
9 you don't -- if you can't help on this, then let us move  
10 on.

11 The third modelling point that you make relates to  
12 Bishops Stortford flows. That's in your paragraph 2.12.  
13 This is your point about the change in Bishops Stortford  
14 being very small, and you have said that -- you point to  
15 flows being very small and in table 4 and then in table  
16 5 you show the increase in Bishops Stortford employees.  
17 This is paragraph 2.14 from 25 million to 35 million,  
18 being 354. Do you see that?

19 A. Yes.

20 Q. You then say in paragraph 2.15 that you would estimate  
21 that to be equivalent to about 20 to 25 vehicles. Then  
22 going back you say because the models were showing 20 to  
23 25 vehicles, there must be something wrong with the  
24 model. Do you remember the point?

25 A. Well, what I am trying -- what I am trying to say is

1 I would have expected there to have been a larger amount  
2 of employee traffic from Bishops Stortford to the  
3 airport than the model was showing, and I have  
4 demonstrated in subsequent analysis my understanding, in  
5 interpreting the figures, how the model is working.

6 Q. If we look at BAA/3/H, we will see why that analysis is  
7 wrong, because what you didn't take into account was the  
8 data that has been available to us for some 18 months  
9 now in the TA, that made it clear that the employee  
10 reporting profiles are not 15%, as you had assumed, but  
11 18%, 0.18 in the 25 case and 0.16, 16% in the 35 case.  
12 The reason for that was explained by Mr Maiden, wasn't  
13 it?

14 A. I wasn't here when that evidence was given, but --

15 Q. It is to do with the characteristics of the airport. As  
16 the airport grows, it becomes more of a 24-hour  
17 operation. What the TA shows is a series of graphs over  
18 time of how the employee reporting times have flattened.  
19 Mr Maiden, his view is that that continues into the  
20 future.

21 Now if you do apply the data in the TA, you see the  
22 difference in number of trips is only 7. Yes? Of  
23 course, as is pointed out, that doesn't take into  
24 account the fact that in the 35 case because of the  
25 enhanced public transport, which is intended to produce

1 peak hour and other car trips, you would expect the  
2 number of additional employees, in fact, to be even less  
3 than 7. That's then consistent, is it not, with the  
4 modelling and the model results?

5 A. I have demonstrated that the modelling results appear to  
6 show that there's a net increase of zero, which -- the  
7 thing is with the -- I know throughout we have to deal  
8 with the output from models and looking at individual  
9 numbers at the centre of the forecast, etc. I am  
10 just -- I am trying to point out, and I believe it says  
11 it in the evidence -- I know it says it in the  
12 evidence -- that a town the size of Bishops Stortford  
13 that is close to the airport, where there are a large  
14 number of people who live in Bishops Stortford who work  
15 at the airport, one would expect there to be an increase  
16 in vehicle movement from Bishops Stortford to the  
17 airport for employees. That's the short point that I'm  
18 trying to make.

19 Q. There is an increase, as your table D4 tells us. You  
20 told us it was 13.

21 A. But what I have also said is if one looks further at the  
22 traffic figures, one can see that there are 13 vehicles  
23 coming in at the southern end of Bishops Stortford that  
24 are airport-related, that clearly must come out of  
25 Bishops Stortford at the other end at some point to go

1 to the airport.

2 Q. Mr Humby, this is where, to use the inspector's analysis  
3 of trees and the wood -- the message that is coming from  
4 this is we are dealing with very small changes. Even if  
5 the change was 10 rather than zero, that would make no  
6 material difference, would it, to the impact on any  
7 junction, would it? There are thousands of vehicles  
8 going through Bishops Stortford in the morning peak  
9 hour. It would make no material difference, would it?

10 A. Well, I'm assuming that the airport -- that the  
11 demand --

12 Q. Don't tell me what you assume the airport. Just answer  
13 that particular point.

14 A. The figures show that there will be an impact of airport  
15 traffic on the junctions around Bishops Stortford.

16 Q. With respect, that's not even nearly what I asked.  
17 I said to you that if the figure was not zero or very  
18 small, but was 10, or 10 more, or even 20 more, that  
19 wouldn't make any material impact, would it, on the  
20 overall traffic flows and conditions at junctions in the  
21 entire AM peak hour on all roads in Bishops Stortford?  
22 We are arguing about tiny little figures, Mr Humby.

23 A. What I am seeking to demonstrate is that I am surprised  
24 that the level of increases is so small. That's my  
25 simple point.

1 Q. Let us move on then to the last of the four  
2 uncertainties that you point to, which lead Herts County  
3 Council to doubt the models. Let us look at  
4 paragraph 3.15 in the proof. Now this is the point at  
5 the top of page 17 where you say by reference to the  
6 table at page 26 of your supplementary that  
7 an additional 500 -- in fact it is 491 just for the  
8 record -- an additional 500 vehicles approaching the  
9 airport from Little Hadham at the AM peak appear to  
10 disappear. Do you recall the point?

11 A. Yes.

12 Q. And again we hadn't heard that point before. So we  
13 produced the turning assignments from the model. That  
14 you have as BAA/3/G. You can see there on the sort of  
15 upper left-hand side the additional 491 vehicles moving  
16 into the junction. Now I need to just identify a note  
17 of caution. This table had to be produced, or this  
18 figure, fairly quickly from PCUs which were then  
19 converted into vehicles. You will note when you compare  
20 the figures on your page 26 those on with those on the  
21 figure there are occasionally very small discrepancies,  
22 two or three vehicles, which is just the conversion  
23 rate, but let us take figure 1 at face value. What you  
24 see there is although an additional 491 vehicles move  
25 into that junction, only 226 turn left, north on to the

1 A120 bypass. Now, when you get further round, the  
2 figure is minus 5, because -- you need to look at the  
3 flows then from the other two legs -- coming from the  
4 A1250 Bishops Stortford, zero turn right on to the A120  
5 bypass, but then coming north on the -- is that  
6 section there still the A1184 leading into that junction  
7 or is it -- I think it is, is it not?

8 MR BOYLAND: According to the ordnance survey map, it is.

9 A. It becomes the 1184 south of the A120.

10 MR HUMPHRIES: It is the 1184. What has happened there is  
11 minus 141 and are moving north on that link. That is  
12 less than without the bypass. What then happens is 103  
13 of those turn left. Minus 13 go right and you get minus  
14 231 that turn north. That's why the additional 226 from  
15 the A120 that turn left is balanced by reduced flows  
16 from the other arms, which means that the net number  
17 moving northwards along the A120 bypass is minus 5.  
18 It's a redistribution of flows.

19 A. I'm sure your analysis was correct. I didn't follow  
20 every plus and minus that you went through there.  
21 I assume that this is a direct output from the traffic  
22 model as such.

23 Q. The numbers in PCUs are a direct output. The figure is  
24 then graphically created. Just follow it with me from  
25 the A1004, because that's where, with the bypass,

1 traffic is taken from.

2 A. The B1004, I think it is.

3 Q. Sorry. B1004. 203 fewer are coming in on the B1004.

4 Of those a reduced number of 120 turn left. A reduced

5 number of 77 go on, and a reduced number of 6 go right.

6 When you look at the other movements on that junction

7 from the other legs, the result is a reduction of 53

8 moving north on that leg to the Tesco junction. At the

9 Tesco junction there's another series of turns and the

10 reason why you get a reduction by the way on the Tesco

11 junction is that there is another exit from that housing

12 estate and Tesco down on to the Eastwood leg of the

13 B1004, over here -- we haven't shown it. Traffic is

14 reassigning from doing that, coming straight out here.

15 A. Sorry. Are you saying -- are you saying that the spur

16 that's shown on the diagram is more than --

17 Q. The spur goes to Tesco's and the housing but the Tesco's

18 and housing also has another connection out on to the

19 highway network on to the B1004. It is just not shown.

20 A. I can't check that. I did go round the roundabout last

21 night, I must admit, because I needed to go to Tesco's.

22 Both of the exits from that roundabout suggested they

23 were cul de sacs, but we would need to look at the

24 detailed road network.

25 Q. I have seen it from the model. So you then get, after

1 the Tesco turning, a total of 141 fewer going north.  
2 That minus 141 then becomes the three turning movements  
3 we see there, plus 103 go left, minus 231 go north,  
4 minus 13 go south.

5 Now the problem, Mr Humby, is you just looked at the  
6 overall figures and let to the assumption that the model  
7 must be wrong, haven't you? That's your point here.

8 500 movements disappear?

9 A. Yes. What I'm saying is intuitively I would have  
10 thought that had -- if there was an increased role -- if  
11 there were an increase in the amount of traffic on the  
12 A120 at Little Hadham as a result of the bypass, that  
13 one would have seen an increase in traffic on the bypass  
14 around Bishops Stortford. That's not an unreasonable  
15 conclusion to come to.

16 Q. But, Mr Humby, on closer analysis, in fact, whether that  
17 conclusion is reasonable or not, it's wrong, isn't it,  
18 as the diagram shows? There's a perfectly logical  
19 explanation as to where the traffic goes and why.

20 A. I follow through the analysis that you have suggested  
21 and I understand that it can be a complex set of pluses  
22 and minuses overlaying one another. I understand that  
23 point, but it does show as well that there will be  
24 an increase in traffic going into Bishops Stortford of  
25 190. Now there may be other reasons why that is

1           happening as well.

2    Q.   It is 172 that go into Bishops Stortford, but when you

3           look at figure 2, you can see that the number of those

4           that are airport-related is zero; in other words, what

5           introducing the bypass does, your bypass, is to make the

6           A120 more attractive and to bring more people towards

7           Bishops Stortford.  It is nothing to do with the

8           airport.

9    A.   Well, the model is seeking to model all of the traffic,

10           isn't it?  It clearly models airport-related traffic

11           separately, but it also has to -- it is demonstrating

12           how it models all traffic.

13   Q.   What it is showing is the airport traffic goes north

14           around the A120 bypass and the increased flows is a flow

15           as a result of your introduction of the bypass.  You

16           made the A120 a more attractive route to traffic,

17           haven't you?

18   A.   It is at that point I would have expected there could

19           have been an increase in flow on the bypass itself as

20           well.

21   Q.   I think it is about at capacity.

22   MR BOYLAND:  If I can just interject in the hope of being

23           helpful, is Mr Humphries' point not that the traffic

24           which joins the bypass at the junction with the A120

25           traffic which for the most part would have been there

1           anyway? It simply gets there by a different route. And  
2           that's why you said there is no change. I think if you  
3           look at figure 2, that's perhaps more easily seen,  
4           because for the most part the changes there are  
5           negligible. The substantial changes are the increase in  
6           traffic on the A120 west, the decrease in traffic on the  
7           B1004, which when they get to the roundabout at the  
8           beginning of the bypass produce the net result of 33  
9           increase. That's basically the scenario that you are  
10          trying to describe?

11   MR HUMPHRIES: Precisely. It is a reassignment caused by  
12          the introduction of the bypass, which becomes a better  
13          route and therefore attracts traffic that would have  
14          travelled on other routes.

15   A. I mean, clearly it's easier to understand changes in  
16          movements if you're merely looking at the traffic coming  
17          to the airport, because you're looking at it going from  
18          a single point to a number of different destinations and  
19          therefore that's what makes trying to understand figure  
20          2 much more easy than trying to interpret figure 1.

21   MR BOYLAND: I am a simple soul. I always go for the  
22          easiest thing first and then look in more detail later  
23          if necessary.

24   A. Can I also point out that it does appear to show that  
25          there is, again, zero traffic at the southern end of

1 the --

2 MR HUMPHRIES: Not zero traffic; zero change.

3 A. Zero change. Okay, but clearly it is much easier to  
4 follow through figure 2 than it is figure 1.

5 Q. So again, Mr Humby, with this fourth of your  
6 uncertainties, in fact there is no uncertainty there in  
7 the model. The model is behaving perfectly correctly,  
8 intuitively and doing exactly what one would expect it  
9 to. With the bypass traffic has been reassigned to the  
10 better route from less attractive routes. That's what  
11 one would expect.

12 A. I accept that the A120 is a more attractive route than  
13 the B1004. That's not at issue, I don't think. What  
14 I would then question is whether it is reasonable that  
15 there will be no increase in flow on the bypass at  
16 Bishops Stortford and yet apparently an increase in flow  
17 through the middle of the town.

18 Q. Let us move on now to the HCC calculation of  
19 contributions. Can we just start by agreeing some  
20 ground rules? We can agree, can't we, first of all,  
21 based on circular 5 of 2005, that any contribution  
22 should reasonably relate to the impacts of the proposed  
23 development?

24 A. We are back where we were earlier on.

25 Q. Yes.

1 A. I was indicating that I think it is appropriate to  
2 consider the benefits as well to traffic going to the  
3 airport, that is airport related.

4 Q. It is useful at least to identify that. We can agree,  
5 can't we, that BAA has discharged the mitigation for the  
6 15 to 25 MPPA development by the MOVA which was in  
7 clause 8 of schedule 5?

8 A. Discharged the obligation, yes.

9 Q. We can agree perhaps that the contribution should not  
10 simply be a tax on existing users on the highway  
11 network?

12 A. Yes.

13 Q. Even if, of course, those users do benefit from the  
14 bypass?

15 A. What I am seeking to show is that, as I have said  
16 earlier, it is not unreasonable to consider the benefit  
17 to -- wider benefit to all airport-related traffic.

18 Q. Okay. We will not go over that again. As you are  
19 seeking a contribution to the cost of the bypass, it  
20 would be appropriate, wouldn't it, to consider the  
21 impact of the proposed development on the bypass?

22 A. Yes, and we have also sought information from your  
23 assessment as to what the effects of the bypass is on  
24 airport-related traffic.

25 Q. Now let's then start looking at some of your tables to

1 see how you get to your 10%. You build up from a number  
2 of different figures. Let us start with table D7. D7  
3 is --

4 MR BOYLAND: We are working off the updated one, I assume?

5 MR HUMPHRIES: Very good point, sir. Yes, I have a big note  
6 next to it, saying, "Work from the updated one", and I  
7 haven't done so. In the updated one, Mr Humby, just  
8 help me with those three final columns. The first one  
9 is percentage airport of total 35 MPPA plus 15. So  
10 that's simply, I believe, the percentage that the  
11 airport represents of the total traffic in the 35 plus  
12 15 MPPA case. So it's that column we can see here in  
13 the table that's headed 2014, 35 MPPA plus 15 with  
14 bypass, airport total and the percentages there are --

15 A. The 10.2% has been arrived at as dividing 217, which is  
16 in the fourth column, airport related traffic, by 2133.

17 Q. Right. Now the next column along in those final three  
18 is "Percentage airport growth of total 35 MPPA plus 15".  
19 Now percentage growth of what or against what?

20 I couldn't myself quite work out what this represented.  
21 It is my fault, but I couldn't. If someone wants to  
22 prompt you, Mr Humby?

23 A. I am trying to follow through. I was hoping -- I had  
24 annotated all of my tables but this, but this particular  
25 one.

1 Q. If Mr Bailes has the answer -- I would rather someone  
2 told me.

3 MR HILL: I think there is probably a problem with the title  
4 on the column. I think that is the issue. Perhaps this  
5 is a good moment, as it approaches 3.25, for us to tell  
6 you what the title ought to be. I can see the problem.

7 MR BAILES: The increase, 25 million without the bypass to  
8 35 million plus 15% with the bypass. There is a column,  
9 the difference of numbers and that title should be on  
10 top of those last three percentage columns in each case.

11 MR HUMPHRIES: So that's growth from the first overall  
12 columns we have here, 25 without bypass to 35 plus 15  
13 with bypass?

14 MR BAILES: That's right. So that percentage of the airport  
15 of the total and then the percentage of the airport  
16 growth.

17 MR BOYLAND: I am sorry. You are going to have to take it  
18 a bit more slowly for us.

19 MR HILL: Sir, why don't we write it down on a piece of  
20 paper and circulate it during the adjournment.

21 MR BOYLAND: The easiest thing might be to annotate a copy  
22 of this table and then circulate it again.

23 MR HUMPHRIES: And the final column?

24 MR BAILES: The final column is the growth in airport  
25 traffic, 25 million without, 35 million plus, as a

1 percentage of the total growth in traffic, 25 without  
2 the 35 million plus.

3 MR HUMPHRIES: Right. What is the difference between the  
4 last two?

5 MR PHILLIMORE: I think it would be helpful if we adjourn  
6 now and it can be sorted out during the break. It is  
7 3.25. So we will come back at 3.40, please.

8 MR HUMPHRIES: In answer to your previous question, sir,  
9 obviously things have taken a little longer.

10 MR PHILLIMORE: I think they are.

11 MR HUMPHRIES: I was doing very, very well and then it  
12 slowed dramatically.

13 MR PHILLIMORE: I think -- I concluded we would not get past  
14 Mr Humby today, but within that are we likely to  
15 complete his evidence?

16 MR HUMPHRIES: Yes, I think so, sir. Oh, yes.

17 MR PHILLIMORE: I would rather be overpessimistic at this  
18 point. If you are on course to finish today, I think  
19 that's probably as much as we can expect. We are now  
20 adjourned then until 3.40.

21 (3.25 pm)

22 (Short break)

23 (3.40 pm)

24 MR HILL: Sir, I hope that has gone round now. As you can  
25 see the words "percentage airport" were missed off the

1 top of the last column. Mr Bailes has labelled each of  
2 the columns and provided a key to show how those figures  
3 in 11, 12 and 13 in particular arise.

4 MR PHILLIMORE: Thank you for that. Mr Humphries, are you  
5 happy with that clarification or do you need a --

6 MR HUMPHRIES: No, sir. That's very helpful. I think the  
7 most helpful thing is actually the little key at the  
8 bottom.

9 MR PHILLIMORE: Yes, that's right.

10 MR HUMPHRIES: Because whatever it says at the top, it means  
11 I can understand what it really means.

12 Mr Humby, we can see, can't we, therefore, that the  
13 figure that is underlined, which you have drawn  
14 attention to earlier, the 9.9% in column 13, is -- the  
15 figure for column 9 over column 10 and the figure for  
16 column 9 is itself column 7 against column 1?

17 A. Yes.

18 Q. So what you have done is you have looked at column 1,  
19 the airport traffic along the A120 without the bypass.  
20 You have then compared that with column 7, which is the  
21 airport traffic along the bypass in the 35 million plus  
22 15 case. Yes?

23 A. Yes.

24 Q. Now let's analyse that, first of all. That traffic in  
25 the 35 plus 15 case with the bypass will comprise two

1 things, won't it? It will comprise that traffic which  
2 comes from G1, because it's the 35 plus 15 case?

3 A. Yes.

4 Q. But it will also include that traffic which was already  
5 on the network somewhere in the 25 case, but which has  
6 moved to the bypass when the bypass becomes available,  
7 because the bypass is a more attractive route?

8 A. Yes.

9 Q. And, therefore, that relationship which is then  
10 expressed in column 9, I believe, which is the  
11 incremental growth, the 97, the 97 is not G1 traffic,  
12 additional G1 traffic. It's additional G1 traffic plus  
13 re assigned 25 MPPA traffic?

14 A. Yes.

15 Q. Right. That you have then expressed as a percentage of  
16 total traffic on the bypass in the 35 MPPA plus 15 case  
17 and that's what gets to 9.9%?

18 A. Yes.

19 Q. Therefore, going back to my previous point, what the  
20 inspector needs to note is that although on one level  
21 you appear to be comparing a 25 to 35 case, in fact,  
22 a lot of the traffic is simply reassigned traffic that  
23 was already on the network.

24 A. It's airport-related traffic.

25 Q. That was already on the network.

1 A. That has been -- that is transferred to the A120 as  
2 a result of the bypass.

3 Q. And if we want to understand what the proportions are,  
4 keep hold of that table but then look at Mr Forshew's  
5 supplementary on page 24 and look there at table A3. We  
6 can see that simply looking at 25 case with the bypass  
7 and 35 case plus 15% with the bypass gave us  
8 an increment of plus 27 movements?

9 A. Yes.

10 Q. And, therefore, in your own calculation anything else  
11 must simply be reassigned 25 MPPA traffic. Yes?

12 A. Yes.

13 Q. Subject to your checking and indeed my checking, because  
14 I have only just seen the explanation, we also need to  
15 note that your column 13 then expresses that 97  
16 movements in column 9 not as a percentage of all the  
17 traffic on the bypass, because that's in excess of 2100.  
18 You have expressed it as a percentage of the increase in  
19 traffic as between columns 2 and 8, which again is  
20 a reflection of 25 MPPA without the bypass and 35 MPPA  
21 plus 15% with the bypass.

22 A. What is --

23 Q. Can you just confirm? I mean, I am just looking at  
24 where column 10 comes from. I am told it comes from  
25 column 2 and column 8.

1 A. Yes. Column 10 is -- in looking the numbers that I have  
2 put in, which is the average of -- I think we were  
3 looking at the row with the average of the two figures  
4 that we have on the A120 either side of Little Hadham,  
5 looking at the totality. It is 2133 minus 1154. Yes?  
6 On the updated table D7.

7 Q. Yes.

8 A. So that's the increase in traffic on the A120 as  
9 a result of the bypass.

10 Q. Yes, but you have not then expressed the additional  
11 airport traffic as a percentage of the overall amount of  
12 traffic on the bypass, which would seem logical -- how  
13 much of the additional traffic on the bypass is in some  
14 way related to the airport. You have expressed it as  
15 a difference figure compared with another difference  
16 figure, which gives you this inflated 9.9%. Mr Humby,  
17 I mean, if nothing else, I am sure you will agree it is  
18 somewhat contrived?

19 A. You may say it is contrived. I think what I am seeking  
20 to show is what is the proportional increase on the A120  
21 of the 35 minus 25 traffic -- I accept without the  
22 bypass, because traffic will be attracted --  
23 airport-related traffic will be attracted to the bypass,  
24 divided by the increase in traffic on the A120 as  
25 a result of the bypass. So if you like, it's both the

1 increase in traffic on the A120 as a result of the  
2 bypass, of the effect on the airport-related -- on the  
3 25 to 35 airport-related traffic that will be using the  
4 bypass.

5 Q. Yes, but the point, Mr Humby, is that you have confused  
6 the effects of the bypass with the impacts of G1. In  
7 other words, it would be possible here to derive  
8 a contribution, which I think would be well over  
9 £1 million from BAA, even if G1 was refused, on the  
10 basis that more airport traffic transfers to the bypass,  
11 wouldn't you? If you took out that extra 27 G1 vehicles  
12 and you just looked at the rest of it, you would still  
13 get a percentage of about 7% of your 20 million cost of  
14 the bypass which you said BAA ought to pick up, and  
15 that's with G1 refused.

16 A. I don't follow through the maths.

17 Q. Well, you can see that 97 vehicles produces 9.9%. Take  
18 off 27 from that. It gives you about 70 vehicles. That  
19 therefore is about 7%. I mean, it is -- not to be  
20 unkind, it is frankly hopeless as a method for trying to  
21 derive a contribution from BAA in accordance with  
22 circular 05 of 2005. It is something that is a result  
23 of the impact of the proposed development and it  
24 proportionate in scale to that impact?

25 A. What I am seeking to show clearly is -- I feel that I am

1 looking at the difference between 25 and 35. What I am  
2 looking at is that in relation to the effect that the  
3 bypass has on those movements and therefore the benefit  
4 of the bypass.

5 Q. If we just look at your paragraph 3.17 for a moment, you  
6 tell us there that in the middle of the paragraph that  
7 35 million plus 15 forecasts are used, as preferred  
8 generally by the County Councils as better representing  
9 the potential impacts. You will note that in the  
10 calculation of BAA's contribution it has used the 35  
11 plus 15 figures, hasn't it?

12 A. Yes.

13 Q. You go on in that paragraph to say:

14 "This percentage for the two links combined in  
15 table D6."

16 Now table D6, of course, was the percentages with no  
17 bypass and there you have percentages in the change from  
18 25 MPPA to 35 MPPA plus 15% of A120 west of Little  
19 Hadham total 2.2%. Yes?

20 A. Yes.

21 Q. And A120 east of Little Hadham total 1.9%, which you  
22 tell us gives a contribution of 0.43?

23 A. I've taken -- I've used the average. I've used the  
24 third row.

25 Q. Sure.

1 A. And I've used the 2.1% from there.

2 Q. I'm not arguing --

3 A. Multiplied by the cost, yes.

4 Q. I am not arguing with the amounts. I am saying if one  
5 simply looks at the flows on the A120 as existing,  
6 that's the sort of contribution you get. The difficulty  
7 with that is it's a 0.43 contribution assuming no  
8 bypass. Yes? This is without bypass, isn't it?

9 A. Yes.

10 Q. But what you are seeking a contribution to is the  
11 bypass, isn't it? You are not seeking a 0.43 million  
12 contribution to better signals or some junction  
13 improvement. You are seeking it to the bypass.

14 A. Yes, but what I'm --

15 Q. And that, of course, is precisely what Mr Forsheew has  
16 done. He has looked at the flows in both cases with the  
17 bypass, because that's what you want a contribution  
18 towards. When you look at that because you have higher  
19 flows, you get an average percentage of 1.25. That is  
20 the proper basis, isn't it, when one is examining the  
21 impact on the bypass to which you want us to contribute?

22 A. I feel that using that calculation, that it doesn't  
23 fully represent the benefit of the bypass to the  
24 airport-related traffic or indeed if one looked at the  
25 calculation table D6, again we are looking at

1 a difference -- we are looking at 25 and one is 35 and  
2 looking at that against the existing flow on the road.  
3 I think that the -- I think the difficulty we have here  
4 is that I don't accept that the approach that Mr Forshe  
5 has shown reasonably reflects the benefit of the bypass  
6 to the airport-related traffic. I am looking throughout  
7 airport-related traffic. I'm seeking to try to find  
8 a way of understanding what the effect that the bypass  
9 will have on airport-related traffic.

10 Q. Yes, but, Mr Humby, the difficulty with this is that BAA  
11 has already mitigated at Little Hadham for the impact of  
12 the 25 MPPA case. We have agreed that.

13 MR BOYLAND: Mr Humphries, we seem to be going over and over  
14 the same ground again. I think the difference between  
15 you, BAA, and the County Council, is very clear. Your  
16 position, or BAA's position, is that it should  
17 contribute, if at all, to the bypass on the basis of the  
18 relative growth arising from G1. The County Council  
19 seems to take the view that it should contribute on the  
20 basis of total airport-related traffic. That difference  
21 is fairly clear. I would have thought that which of  
22 those is appropriate is for submissions. I am not sure  
23 that just going over the same ground again is going to  
24 get us much further.

25 MR HUMPHRIES: Sir, I think that is helpful. Sir, you will

1 appreciate a lot of the numbers have only just arrived  
2 very recently and to an extent --

3 MR BOYLAND: Yes. I am trying to divorce the principles  
4 from the numbers here.

5 MR HUMPHRIES: Yes.

6 MR BOYLAND: If the principle is established, then we can  
7 deal with the numbers.

8 MR HUMPHRIES: All right. Mr Humby, we are very close to  
9 the end anyway. It may be that a single point can deal  
10 with it. Do you accept that if the correct approach to  
11 the calculation of the contribution is to look at the  
12 impact of G1, the G1 traffic on the bypass, then the  
13 correct contribution is 0.25 million pounds?

14 A. No. I feel that we are going back over old ground  
15 again. I think my position has been made clear, that I  
16 am --

17 MR BOYLAND: Mr Humby, the question was if the correct  
18 approach is to calculate on the basis of the impact of  
19 the G1 traffic.

20 A. Has Mr Forsheew carried out the calculation correctly, if  
21 you like, Then you come up with the figure of £250,000.

22 MR HUMPHRIES: Thank you.

23 MR BOYLAND: I appreciate that you don't accept the  
24 proposition, but it's on that basis.

25 A. Yes.

1 MR HUMPHRIES: And are we agreed, therefore, that the  
2 balance between that figure, £250,000, and your  
3 client's, or the County Council's figure of  
4 £2 million -- in other words £1.75 million -- that  
5 difference represents the benefit to existing users.

6 A. Well, I would argue that the benefit of the bypass is  
7 wider than just to existing users and there are wider  
8 benefits of the bypass to airport-related traffic.

9 Q. Sorry, Mr Humby. I must not have made it clear. I was  
10 trying to isolate the contribution of 0.25 million  
11 pounds as being that which is related to the impact of  
12 G1 on the bypass, and I think we agreed that that is  
13 a correct calculation.

14 A. Yes.

15 Q. Now your clients have claimed 2 million, which is  
16 an additional £1.75 million. Can we agree,  
17 conceptually, if you like, that that figure, that  
18 balance is that wider benefit that you are talking about  
19 to airport users?

20 A. I think what that assumes is that there is no -- there  
21 is only a limited benefit to the airport -- the G1  
22 traffic. What I am saying is that the traffic without  
23 the bypass will be held up at the traffic lights. It  
24 will be delayed. With the bypass in place there will be  
25 a considerable benefit just to that traffic in terms of

1 reduced delays, etc, and I feel that the calculation  
2 that has been done underestimates the benefits to that  
3 traffic of the bypass.

4 MR BOYLAND: I am not sure whether -- that look from  
5 Mr Humphries indicates my view. I am not sure that that  
6 answers the question. The question was, if I recall it  
7 correctly, does the difference between 0.25 million and  
8 the 2 million represent the benefits to existing  
9 airport-related traffic? I don't think there is any  
10 dispute there would be benefits to that traffic, but is  
11 that how -- where the 1.75 arises.

12 A. On that strict calculation I have to accept that that's  
13 the position, yes.

14 MR HUMPHRIES: Thank you.

15 MR BOYLAND: Does that answer the question?

16 MR HUMPHRIES: Yes. That's all I have to ask. Thank you.

17 MR PHILLIMORE: Mr Hill, you are flicking through your  
18 pages. I don't know if you have an estimate of how long  
19 you are going to need?

20 MR HILL: Absolutely no problem whatsoever in completing  
21 this afternoon, sir.

22 Re-examination by MR HILL

23 MR HILL: Can we go back to the beginning then, Mr Humby?  
24 Normal approach, and we started with it being put to us  
25 via CD/276 that relatively little airport traffic uses

1 the A120 through Little Hadham. I just want to get your  
2 sort of general view. That question was put in very  
3 general terms. Is that consistent or inconsistent with  
4 the request to BAA for 10% contribution with 90% being  
5 derived elsewhere?

6 A. No. It's quite clear that airport-related traffic is at  
7 least 10% of traffic on this section of A120 through  
8 Little Hadham and that increases in flow as the --  
9 sorry -- it is at least 10% of the traffic on the  
10 section of A120.

11 Q. Now funding in that context. Is there regional funding  
12 secured for bypass development?

13 A. No.

14 Q. Thank you. Then you were asked about the 2003 planning  
15 permission and the documentation submitted in support of  
16 the 15 to 25%. Do you recall that?

17 A. Yes.

18 Q. We looked at some of the documentation that came with  
19 the environmental statement at that time. There's the  
20 15 to 25 MPPA assessment and the proposed mitigation or  
21 the MOVA system which you recall being asked about.  
22 That's 15 to 25 MPPA. That 25 MPPA top end of the  
23 range, was that 25 MPPA forecast for the A120  
24 a constrained forecast, taking account of the depressing  
25 effect of the Little Hadham lights on movement along the

1 A120?

2 A. Yes.

3 Q. So was any account taken at that stage in 2003 of  
4 airport related flows which would be attracted to the  
5 A120 with a 25 MPPA airport and Little Hadham bypass?

6 A. No.

7 Q. Thank you. Now, my learned friend put to you, having  
8 looked at various documents, that he had not been able  
9 to find any document saying that adjusting the lights at  
10 Little Hadham was a short-term solution. Do you recall  
11 that point being put?

12 A. Yes.

13 Q. We looked at the committee report, etc. In your view,  
14 Mr Humby, and I think you were around at the time, was  
15 there any doubt in 2003 that MOVA was a short-term  
16 solution for relieving Hadham problems?

17 A. No.

18 Q. Turning to the questions that you were asked this  
19 afternoon -- we are already into the afternoon, in fact,  
20 you will be glad to know -- I think it was put to you  
21 that the models as run in the TAAU constrained the flows  
22 on the A120 to 1240 movements. Do you recall that? You  
23 were looking at -- this is in the context of the  
24 questions about what happened in 2003 and what was  
25 predicted for 2014. Is that a figure that you have seen

1 set out in documentation?

2 A. No.

3 Q. I will ask Mr Forshew about that. You were then asked  
4 about BAA/3/H, which is the one that deals with the  
5 traffic -- the non-existent incremental traffic from  
6 Bishops Stortford in the 35 MPPA case. A number of  
7 points were put to you on that. We went round the  
8 various figures. Having been heard the points that have  
9 been put to you. Do you wish to review the evidence you  
10 gave in chief that you didn't find it credible that you  
11 could add 350 employees at Bishops Stortford and not see  
12 a single additional movement on the network?

13 A. It still seems to me a very low figure.

14 Q. There is something else I should ask Mr Forshew. The  
15 issue of the Bishops Stortford black hole, just for  
16 convenience. That was BAA/3/G. Now, you were asked  
17 about the minus 88 figure that you referred to in chief.  
18 Mr Humby said, and I noted, that it must be right  
19 because he had seen it on the model. Can you check for  
20 us overnight whether there is, in fact, any link through  
21 to the B1004? And Mr Forshew can do the same?

22 MR HUMPHRIES: I was going to mention this to Mr Hill later.  
23 I think I have misunderstood an instruction on that.  
24 There isn't a connection. I did go up and ask about  
25 that. It is another connection I had seen on the

1 network which leads on to the B1004. So, Mr Humby  
2 needn't drive around the Tesco's housing estate again.

3 MR HILL: That's helpful. No doubt Mr Forshew will be able  
4 to provide an appropriate explanation tomorrow as to  
5 where these locals have disappeared to.

6 Still on that document, the increased flows into  
7 Bishops Stortford diverted apparently off the A120  
8 Bishops Stortford bypass. Can you just help me? Is the  
9 journey through the centre of Bishops Stortford in the  
10 peak hour an easy or a difficult option for the traffic?

11 A. It's very congested.

12 Q. Then the most recent passage of cross-examination really  
13 just explored the two respective positions and there  
14 wasn't anything I need to return to in that regard,  
15 Mr Humby. So thank you very much. Thank you, sir.

16 MR PHILLIMORE: Thank you very much, Mr Hill.

17 Questions from THE TRIBUNAL

18 MR BOYLAND: Just one point, Mr Humby. Could you just give  
19 me an indication of what in your view would be the  
20 outcome if there were no contribution by BAA to the  
21 bypass?

22 A. Well, as I have indicated in my evidence, the method of  
23 funding that the County Council has to use for such  
24 a scheme is through the regional funding allocation.  
25 There are limited funds available to the region from

1 central Government in the region to fund such schemes.  
2 The fund is currently oversubscribed and there has to be  
3 prioritisation of the funding. The next review of that  
4 prioritisation will take place, we understand, in a year  
5 to two years, in about a year's time, where the  
6 Government will ask the region for its views on its  
7 priorities, and this scheme will be put forward by  
8 Hertfordshire County Council in at that process.  
9 Clearly where there is limited funds available, the less  
10 call that the County Council seeks to make on the  
11 regional funding allocation means there is better chance  
12 of securing money from Government. So if we were to  
13 receive a contribution from BAA, then the net call on  
14 Government funds would be reduced and therefore the  
15 prospect of the Government funds being made available  
16 would increase.

17 MR BOYLAND: So the outcome of all that, if I understand you  
18 right, is that the lack of a contribution from BAA will  
19 diminish the prospects of the bypass going ahead or at  
20 least push it back into the future?

21 A. Yes, it will make it more difficult for us to secure the  
22 funding from central Government.

23 MR BOYLAND: Thank you.

24 MR PHILLIMORE: Just to pick up on that point, I think the  
25 question was put in terms of the choice between what you

1 are looking for and the absence of the contribution.  
2 Obviously the contribution that has been suggested is  
3 the sum of £250,000.

4 A. Yes.

5 Q. Just to clarify your response on the basis of that  
6 particular point?

7 A. At the end of the day I think £250,000 will not assist  
8 in the funding process.

9 Q. Thank you. A different matter. In your supplementary  
10 proofs in paragraph 4.13, you refer to one of the  
11 benefits of the bypass as being to provide a better  
12 alternative route than the motorways M11 and M25  
13 congested. There has been a quite of lot of evidence to  
14 the Inquiry from third parties relating to congestion  
15 and in particular the effect of closures of the M11 and  
16 the situation that arises when that happens. Could  
17 I just have your views on that particular circumstance,  
18 just to try to be more precise in terms of how that  
19 relates to the scenario that might arise and the  
20 benefits that would derive from the bypass that you are  
21 putting forward?

22 A. I mean, as set out in my original evidences, the fact  
23 that the A120, this section of A120 is part of the  
24 diversion routes that the Highways Agency employ when  
25 there are problems particularly on the M11, traffic uses

1 the A120 and the A10 to avoid any problems that exist on  
2 the M11. What I have set out in my evidence was the  
3 information that I received from the Highways Agency as  
4 to how many times in the last -- in recent period that  
5 has been sort of instigated. Now that's when they have  
6 set up a particular diversion, they know that they are  
7 going to have a closure for a considerable period of  
8 time and that they have to set up an alternative route.  
9 What also happens clearly is that when there are other  
10 incidents on the M11, and those do occur quite  
11 frequently, particularly on the section north of  
12 junction 8, where it is reduced to two lanes and has  
13 very high traffic flows, then -- and a high proportion  
14 of heavy goods vehicles. So when that section -- that  
15 section is regularly reported on traffic news and the  
16 like in terms of problems. There are a number of  
17 accidents and other occurrences. Now when that occurs,  
18 then obviously traffic will divert on to the A120.  
19 People will -- you know, people will choose to use that  
20 route to try to avoid the congestion. Now obviously  
21 that additional traffic has an adverse impact on the  
22 community of Little Hadham. If the bypass were  
23 constructed, then obviously that something that  
24 additional traffic wouldn't have such an adverse impact  
25 on the residents of Little Hadham because of the bypass.

1 We do know that when the -- I expect that a number of  
2 people will have referred to the most recent occurrences  
3 when the Highways Agency were carrying out works in the  
4 Holmesdale Tunnel on the M25, that those works meant  
5 that there was an increase in traffic on the A120 as  
6 a result of those works.

7 Finally, I often see it, because I have to -- I have  
8 been coming to the airport quite a lot recently. It is  
9 also that the -- I have noted in my evidence that there  
10 are already bus and coach services to the airport that  
11 use the A120, but it is also noticeable -- and they are  
12 scheduled to use the A120 -- but it is also noticeable  
13 that when there are difficulties on the M11 and on the  
14 M25, that the coaches that would normally use the M11 to  
15 get into London or to other locations and get to the M25  
16 do use the A120 and the A10. So it's clearly the route  
17 where there are adverse conditions on the wider network  
18 people will seek to use it.

19 Q. I have no more questions. So thank you very much,  
20 Mr Humby.

21 (Witness withdrew)

22 MR PHILLIMORE: Mr Humphries, we have slightly over half  
23 an hour finishing time. I am looking for views really  
24 on the feasibility of starting Mr Forsheew.

25 MR HUMPHRIES: Sir, I suspect he will take a little more

1 than half an hour. I am sort of in your hands. You  
2 know I generally don't like to lose time. Having said  
3 that, by the time we have set up the boxes and  
4 everything else, I suspect if you want to finish at 5.00  
5 we may not -- I am in your hands.

6 MR PHILLIMORE: We will start tomorrow in that case.

7 I think we will adjourn now and continue tomorrow  
8 morning. So the enquiry is now adjourned until  
9 10 o'clock tomorrow. Thank you.

10 (4.25 pm)

11 (Hearing adjourned until 10.00 am tomorrow morning)

12 --ooOoo--

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