

A Critique of Reading Borough Council (RBC) Information for 19th March on the One-Way IDR Scheme

1 Introduction

The transport documents provided to Cabinet were short on detail and used much padding in an attempt to portray authority and weighty evidence. The documents confuse rather than support or aid comprehension of the complex issues. Precious little interpretation has been offered against the overuse of jargon and a large number of tables, graphs and spreadsheet copies.

This level of technical information, contained in 350 pages (1), is difficult to assimilate for lay persons, including councillors. It raises doubt as to whether relevant information has been taken on board and used for the basis of Cabinet decisions as the advantages and disadvantages are hard to define.

This does not bode well as the foundation for meaningful and serious debate. It demonstrates more concealment of the shortcomings than a proliferation of evidence in support of the IDR case.

While opposition parties have requested a Public Enquiry their position is compromised as they agreed the Provisional 2006-11 Local Transport Plan (LTP2) with the ruling party, which was submitted in July 2005 (2). The one-way IDR scheme proposal has therefore been unable to receive adequate scrutiny within the political structure of Reading.

Notes

(1) Appendix 3 is particularly poorly signposted and explained.

(2) Page vi, Provisional 2006-11 Local Transport Plan

2 The Reading (Highway)Traffic Model (RTM)

The RTM has not been validated for its purpose of predicting the impact of a major road scheme. Validation means that hypotheses have been compared with the outcome of real life situations demonstrating those conditions. Put simply it means there is confirmation that the model can generate accurate predictions of events. The RTM has been validated for certain data (1), but not for determining the essential impact on the road system. The model's ability to forecast changes from the one-way IDR scheme is essentially untested and therefore unknown. In addition, both Faber Maunsell and Peter Brett Associate – Council's consultants - report that the model is at the end of its shelf life and functioning on old datasets (2).

Faber Maunsell conclude *only with heavy caveats* that the RTM is fit for purpose (3). Their report implies the Council require a lower standard of evidence in part because the scheme is “reversible” which it is not (4) and because it is locally funded, although the Council claim central Government funding via GOSE (5)

It appears to us that RBC are less confident in the RTM than they were last autumn as there is a marked change of emphasis on the value and role played by the RTM in Council’s reports 2006 and today (6). Other parts of Reading Borough Council’s wider strategy decision making process, such as noise and air quality modelling, are derived from RTM (7). Therefore these processes are not necessarily independent of each other. The RBC claim that the RTM predictions do not underpin the one-way IDR scheme either fail to withstand close scrutiny, or reveal that other non technical considerations have influenced decision making. These should be disclosed.

The RTM only “models” peak periods in the morning and afternoon (8). Therefore impacts on congestion during the remainder of the working / shopping day are unknown, so for example:

- there is no basis for modelling air pollution or noise pollution impacts of the one-way IDR scheme for the majority of a 24 hour period
- there is no possibility for the RTM to inform retailers of how the one-way scheme might affect customer journeys to their premises for most of the shopping day

The RTM appears to be constantly evolving and certainly the subject of debate (9). Hence it is hard to see how the one-way IDR scheme’s effects can be fully understood and evidence based as claimed by Reading Borough Council.

Notes

(1) Validation work has been carried out for reproducing flows, predicting traffic counts and predicting journey times. The model is claimed to perform within limits felt to be tolerable in these three regards for the existing road network. [see Faber Maunsell report 3.6]

(2) E.g. Faber Maunsell Report “3.5 The model and its sources are some six years old – towards the limit normally accepted for such highway traffic model sources, but by no means unusual in the context of its continued use and maintenance since the original calibration”; and also discussed in Appendix 3 presented on March 19th. Whether or not this is usual practice has no bearing on the effectiveness of the RTM, particularly as it is used as a source of data for other elements of the RBC decision-making “tool-kit” for the one-way IDR scheme such as pollution modelling.

(3) Caveats include:

2.1 The Faber Maunsell commission was carried out against a timescale

totalling an elapsed time of one month, including one week while pba prepared additional detailed results. [pba = Peter Brett Associates]. *This seems an extremely short period of time given the volume of documentation*

2.2 We have not investigated the detailed merits of the scheme itself, or its design, which are largely driven by wider transport policy and environmental considerations.

2.4 [...]there is no clear standard of evidence required for schemes which are locally funded, and more flexible or reversible in their effect. *Faber Maunsell also state in 3.8:* The published material falls short of strict DfT WebTAG guidance for such documents, both in scope and level of detail, but the scope of more detailed background information is considered to meet the guidance.

2.5 Statements and judgements made here rely on direct interpretations of documents provided, and clarifications from pba. While reasonable checks have been made where possible, the available timescale has meant that where appropriate, the pba results have been relied on. *This statement draws into question exactly how independent the assessment was*

3.4 The model exists in morning peak and evening peak versions, and in very broad terms, the levels of validation and emphasis appear similar. For this Review, most investigation has focussed on the AM peak model.

3.5 [...] Only a general outline of the process and results of the calibration exercise is presented in the published LMVR, insufficient to reach firm views – positive or negative – on the detailed process. [*LMVR is the written validation report for the model*]

identifying where they have relied on input from the model developers
Notwithstanding the above,

(4) In fact the one way IDR scheme may not be reversible as it appears that land released by the scheme is to be used to support major development projects.

(5) On March 19th in answer to a question from a member of the public Cllr Howarth stated that the scheme will be met from resources provided by the Government Office of the South East.

The source of funding is also highlighted in Paragraph 8.1: from IDR ONE-WAY –ADDITIONAL MEASURES TRO APPROVAL, 13th NOVEMBER 2006 AGENDA ITEM10: states that “The scheme will be funded by the Local Transport Plan.”

It is mentioned even more specifically, THE ACCESS PLAN FOR READING ONE-WAY INNER DISTRIBUTION ROAD (IDR) [7 SEPTEMBER 2006] states: "6.2 The RTM is also used to support our bids to central government for transport funding and has helped us secure some of the highest settlements in the country, including the recent allocation for M4 Junction 11. The RTM has helped us secure our current 5 year transport funding from central government that would be used to pay for the one-way scheme if it progresses."

(6) The 19 March 2007 papers on the one hand have a very strong focus on the Reading Transport Model, and then on the other say that it is only one element of a wider strategy decision making *tool kit*. However, the 7 September 2006 report

says that the RTM was a *major asset* in the development of the one way IDR scheme (point 5.4), and that it allows the Council to predict what will happen if roads and junctions are changed.

(7) Discussed in Note (1) of Section 3 below: “One-way IDR Scheme Benefits – Not Proven”

(8) Faber Maunsell report: 3.4 The model exists in morning peak and evening peak versions

(9) This evolution in information is clear from the correspondence between RBC, WDC, PBA and Mouchel Parkman, in “Appendix 3” in support of Item 9 of the Cabinet meeting of March 19th 2007.

3 One-way IDR Scheme Benefits – Not Proven

There are no proven major environmental benefits demonstrated by the Council's Environmental Statement, despite Cllr Howarth's claims, and it is wrong to suggest that there are. The Local Transport Plan for 2006-11 (LTP2) strategic environmental assessment indicates that benefits in terms of air and noise quality would be marginal, and the Environmental Statement draws on the LTP2 for its own findings.

- Air quality changes (1) are not substantiated and impacts outside a 4 x 4 km central area of Reading appear not to have been reported. In this central area the modelling indicates that there will be some redistribution of areas of poor air quality. Clear statements in the Environmental Statement for the One-Way IDR Scheme are given that the situation is either uncertain (PM₁₀) or changes are insignificant (CO₂). NO₂ is also considered, but only on an incomplete basis across the Reading area. Furthermore, it is possible that the predictions for air quality apply only for AM and PM peak periods and that there is no information on climate change gas emissions or air quality impacts over the rest of the day. There is therefore no substantive evidence in support of Councillor Howarth's assertion in the March 19th Cabinet meeting that there will be major improvements in air quality from the one-way IDR scheme. Indeed the possibility exists of worsening air pollution.
- Noise pollution is modelled to get worse (2).
- The claimed benefits in townscape are subjective, and likely to be affected by greater levels of standing traffic: perhaps extending out of the current peak hours, which has not been modelled.
- The Statement is also incomplete in terms of the socio-economic assessment mentioned (3).

As an Environmental Statement its reliability is questionable as it is predicted on traffic predictions for only a fraction of each 24 hour period. (4)

Cllr Howarth also asserted on March 19th that the Environmental Statement predicts the worst case scenario for noise and air pollution, and so it was inappropriate to use this document to deny that the one-way IDR scheme will bring about major improvements in air quality and ambient noise. This assertion appears to be based on two premises in the Environment Statement (5). These are:

- (a) that benefits will be greater if a shift from private car use to other modes of transport takes place – although this assertion is backed by no evidence that such a shift will occur, and
- (b) that the traffic projections are a worst case scenario because they include “highways and other developments that have recently been completed, are committed or are likely to be developed by 2009.”

Hence this “worst case” scenario could also be called a realistic projection since firstly; there is no evidence that a modal shift will take place, this appears to be an article of faith rather than fact; and, secondly, the traffic projections take into account what appears to be certain development. It is also worth noting that the LTP2 shows Reading already has one of the highest levels of non car travel in and out of the town centre in the region. Furthermore, Reading’s economy (one of the most active in the region) is likely to drive the pace of development. A true worst case scenario might have considered a higher rate of development in the town. For example, the list of developments in the Environmental Statement excludes developing proposals for Station Hill, Hosier Street / Civic Centre, Reading Cattle Market (suggested by Cllr Page on March 19th), and the railway station.

If benefits in noise pollution and air quality are dependent on this “modal shift”, then there are probably less costly and less damaging and more direct ways of achieving this than the one-way IDR scheme which it is predicted will improve bus times by only 4% in peak periods.

The Environmental Statement should be subjected to independent professional scrutiny given the unsubstantiated claims RBC draws from it.

Notes

Note (1)

Cllr Howarth’s assertion is also reflected at 13.3 (a) in the Agenda 9 document for March 19th, THE ACCESS PLAN FOR READING – PROPOSED ONE-WAY INNER DISTRIBUTION ROAD (IDR). It is not supported by detailed review of documents so far made available.

The Local Transport Plan (LTP2) for 2006 to 2011 scarcely mentions Air Quality and Noise Pollution Issues (a few brief paragraphs 4.26 to 4.30); and it offers no comments about how the environment will change in regard to these. The Strategic Environment Assessment non Technical Summary for the (LTP2) indicates that benefits in terms of air and noise quality would be marginal, and at least the plan is unlikely to make air quality and noise pollution worse.

Page 1 states “Air pollution and noise levels in the Borough are unlikely to increase significantly as a direct result of the plan and indeed some minor benefits would be expected in the short term as a result of improved traffic management measures aimed at removing vehicular traffic from sensitive areas. Over a longer period one of the key aims of the LTP is to engender a modal shift away from the private car and as such a more profound impact would be expected over a 20 year period.” It goes on to suggest (page 19) that the LTP2’s plans to discourage car and so stimulate “a greater modal shift away from the private car than individual schemes can deliver alone. This would be likely to result in greater benefits for both noise and air quality although there may be a trade off with other environmental factors.”

Hence there is no reliable evidence in the LTP2 to show any substantive air quality and noise benefits as claimed by Councillors in the 19th March Cabinet Meeting. The basis for claims of major benefits is a supposed shift away from car use which has not been modelled or quantified.

Link: to LTP2 and its SEA is at

<http://www.reading.gov.uk/ltp/GeneralM.asp?id= SX9452-A7817040>.

Chapter 8 of the Inner Distribution Road, One Way Scheme, Environmental Statement, August 2006 deals with *Air Quality and Climate Change* issues from the scheme. This states in 8.8.6 that “Overall the scheme is predicted to have a major beneficial impact on air quality.” 8.9.5 states: “The impacts on air quality, (nitrogen dioxide (NO₂) and PM₁₀) and climate change, (as carbon dioxide -CO₂-emissions) have been modelled over the Reading urban area. The main impacts on air quality are predicted to occur close to the IDR and the main road corridors into the town. Whilst increases in NO₂ concentrations are predicted in the south east and northern parts of the IDR, this is balanced by improvements elsewhere, including in several of the town’s pollution hotspots. The implication of this statement is that some locations will gain better and others worse.

The impact on PM₁₀ (a measure of particulates) is uncertain and subject to further assessment (8.4.14), The effect on CO₂ (a so-called greenhouse gas) is not significant, estimated to be less than 1% (8.9.1).

No clear data are offered in support of claims for NO₂ changes. Table 8.6 lists net number of receptors and changes in an air quality measure not specified in

the table. This may be a list of criteria as stated in the Table or a summary of likely effects, as set out in the text. If it is the latter then a substantial number of “receptors” might experience minor to severe deterioration in air quality. However, because the table and supporting text are so poorly written it is difficult to determine what they are actually trying to communicate.

Appendix B.1 to the Environmental Statement (Air Quality and Climate Change Technical Report) supplies some further information about NO₂. 3.1.6 and 3.1.7 of this Appendix indicate that a baseline data acquisition for NO₂ around the IDR was still underway as the Environmental Statement was written and that this survey could not be used in the air quality assessment. Data is therefore based on estimated background concentrations and dispersion modelling (3.1.1). Hence the air quality assessment is largely based on forecasts and assumptions which have not been validated against measurements.

Table 6.1 of the Appendix B.1 indicates that in a 4 x 4 km area of central Reading the predictive modelling indicates that far more households will far more dwellings will experience improved rather than poorer air quality as a result of the proposed changes to the IDR. No information is offered about impacts outside this area. No explanation is given of how a peak time road traffic model can be used to support air quality predictions over a 24 hour period.

No significant additional information on air quality and noise pollutions is included in *IDR One Way Scheme Environmental Statement Appendix A.1 IDR Core Scheme Transport and Environmental Report*.

There is *no* mention in Chapter 8 of whether or not this modelling is based on worst case scenarios. The air quality modelling itself is based on a small network of sampling points but Appendix B1 indicates that these are not in the vicinity of the IDR, and modelling of future circumstances based on road traffic data provided by Peter Brett Associates (presumably from the Reading Traffic Model). Bear in mind that this model is only developed for AM and PM peak periods, and therefore provides no basis for projections over the majority of the day. It is therefore hard to see what firm evidential basis was available for modelling air quality from traffic projections over 24 hour periods.

Pages 7-31 through 7-32 of the Environmental Statement show how modelling indicates driver delay in more cases than journeys are accelerated. This must translate to a greater volume of traffic on the IDR at any one time than previously. This greater volume of traffic will also be a direct consequence of the one-way configuration. The RBC *Horizons Newsletter Issue 6* claims a capacity increase at peak times of 15% from 10,000 vehicles per hour to 11,500 (we understand largely as a result of simplified junctions on the IDR). There appears to be no appraisal of how much of this capacity would be used up by the increased traffic resulting from driver delay and greater road miles being required for IDR journeys. If the assumption is made that the nearly all journeys through

the IDR are return journeys (e.g. to and from work, shops etc), and that most people take the shortest route in its two way configuration, then the road distance travelled for each return journey on the IDR will be greatly increased. In simple terms if the entry and exit points for traffic on the IDR are evenly distributed, then the distance travelled by vehicles on the IDR will be increased by 67%.

The one-way scheme is being supported by a 30 mph speed limit and a larger number of pedestrian crossing points.

Much of the modelling for the air quality assessment summarised in Appendix B1 to the Environmental Statement relates to a prediction of changes in the amount of stopping and starting of traffic, as stopping and starting generates a heavier air pollution burden than freely moving traffic (3.3.15 and following). Unfortunately Appendix B1 does not examine the air pollution released by slowly moving traffic (for example using low gear ratios).

Appendix B1 also does not consider how the greater traffic burden in terms of distance travelled on the IDR might cause peak periods to be extended in duration by the one-way scheme and slow moving traffic loads within and outside these periods increased. Both of these effects would tend to increase emissions to air. Hence the appraisal is incomplete, and possibilities for deterioration in traffic emissions to air have been ignored.

Hence while the scheme a predicted major beneficial impact on air quality is claimed, this claim is not substantiated by the evidence actually presented in the Environmental Statement Chapter 8 or Appendix B1. Indeed the possibility exists of worsening air pollution.

NB1 CO₂ is a greenhouse gas, but not a measure of poor air quality. Confounding issues of CO₂ and air pollution does not support clarity in the One-Way Scheme Environmental Statement.

NB2 3.3.9 of Appendix B1 states “Meteorological data for the year 2004 was used as a worst case meteorological year.”

Note (2)

Chapter 9 of the Inner Distribution Road, One Way Scheme, Environmental Statement, August 2006 deals with *Noise Assessment*. 9.4.3 is clear: “it can be seen that the modelled scenario presents higher noise levels for the majority of the locations.” As is 9.8.7 which states “The study concludes that sensitive receptors would receive, as a worst case, a between moderate and minor adverse impact with the majority of receptors experiencing no significant impact due to noise.” Table 9.4 shows modelled changes in noise levels, which range from decreases of 3.4 to increases of 3.6 dB. Again some areas will have

improvements whilst others will have deterioration.

Note (3)

Item 13.2 of the Agenda 9 document for March 19th, THE ACCESS PLAN FOR READING – PROPOSED ONE-WAY INNER DISTRIBUTION ROAD (IDR) claims a socioeconomic assessment finds benefit from the one-way scheme. This assessment is however quite incomplete. For example, it excludes an assessment of driver delay in key groups such as mothers with children, disabled and elderly drivers, as well as the loss of amenity and time for the travelling public in general.

Note (4)

Faber Maunsell Report: “3.4 The model exists in morning peak and evening peak versions”.

Note (5)

Paragraph 1.1.3 of the Environmental statement states “The EIA is considered to be an assessment of the worst case scenario for traffic generation taking into account future planned developments.” This assertion is repeated several times (2.5.3, 7.1.5, 17.2.8, 17.2.9, Table 17.2). 17.2.8 lists the road and built developments being assumed into the assessment, and is based on the *IDR One Way Scheme Environmental Statement Appendix A.2 Reading Transport Model (RTM) Forecast Development Assumptions*.

Paragraph 9.5.4, relating to the chapter on noise pollution, also suggests the environmental assessment is a worst case because it assumes no changes in the types of transportation used. It states: “All traffic flows in the model have been derived using the Reading Transport Model. The traffic forecasts have not included any transfer of road trips to public transport or other modes. It is expected that this will give a "worst case" scenario for estimating environmental changes from traffic flows.” Other paragraphs in Chapter 9 repeat the assertion that the projected increase in noise levels is a worst case scenario, presumably on the basis of the same rationale.

One further “worst case scenario” claim is made in 13.7.23 which claims that viewpoints being shown are worst case because they are shown in the Winter when the trees have no leaves.

The case for “major” benefits therefore relies on more limited development in Reading and on a shift from car journeys to other forms of transport. LTP2 makes clear this shift will be brought about by “aggressive” demand management

such as limiting car parking spaces and deliberate driver delay (e.g. see 3.70; .3.85, 4.8, 9.18 of the Provisional LTP2, 3.5, 5.23, 5.75 and 5.85 in the March 2006 LTP2 submission)

However, no evidence is presented that either development will be less than projected in 17.2.8, or that a modal shift will actually take place.

The list of developments suggested in Environmental Statement paragraph 17.2.8 does not appear to be benchmarked against the 2004 document "RBC Community Strategy - 'Reading 2020", which sets out its "City2020 vision", despite this being mentioned previously in the Statement (e.g. at 1.3.3, 5.4.20, 5.4.21, 7.5.13, 15.1.9, 15.2.13). The list of developments cited runs to 2009 according to 17.2.8. However, the City2020 vision indicates a greater level of development to 2020. It is difficult to determine why the Environmental statement raises this City 2020 vision and then does not use it in its forward projections for modelling.

4 One-way IDR Scheme Impacts

The IDR carries some major impacts for Reading. This is in sharp contrast to the benefits which are only marginal if realised at all. Indeed some claimed benefits such as on air quality may not only fail to materialise, but conditions may worsen, as discussed in Note 1 of Section 3.

Based on the RTM, the Environment Statement identifies that 77% of journeys will be delayed by up to 10 minutes in the AM peak period, and 45% by up to 5 minutes in the pm period (1). This data implies growing congestion contrary to goals of the local transport plan. 15 minutes additional delay each working day equates to one and a half working weeks of time over a year. That is a major socio-economic impact which was not considered in the Environmental Statement. Of course, this rather depends on how accurate the RTM actually is.

Impacts on congestion and journey delay outside the peak periods have not even been modelled.

There has been no attempt to carry out any formal economic impact study as the Council sees this as unnecessary. However, the one-way scheme will have a number of impacts on the local economy. For example, it will affect much of the retail sector situated around the IDR route by: reducing accessibility; reduction of impulse purchases; reduction of ability for people to browse stores; reduction of people's willingness to return for items. These impacts arise because once an exit has been passed there would be a 2 to 2.5 mile journey to get back to a store. A marginal reduction in business turnover of say just a few per cent could translate to job losses and a major economic

loss for the town, yet RBC stubbornly refuses to consider the need for cost benefit analysis.

The data that RBC is presenting, regarding disbenefits of the one-way IDR scheme, are inconsistent (2). As these inconsistencies are unexplained, it would suggest a more in-depth independent technical scrutiny should be initiated.

Notes

(1) Environmental Statement Pages 7-31 to 7-32. Note 8.4.3 in Agenda 9 document for March 19th, THE ACCESS PLAN FOR READING – PROPOSED ONE-WAY INNER DISTRIBUTION ROAD (IDR) suggests the RTM tends to underestimate delay.

(2) 13.5 in Agenda 9 document for March 19th, THE ACCESS PLAN FOR READING – PROPOSED ONE-WAY INNER DISTRIBUTION ROAD (IDR) is not consistent with the Environmental Statement data, and suggests a lesser degree of delay. This would indicate some RTM development. However, the Council Officer, Mrs Pat Baxter, in a presentation supporting Agenda Item 9 on March 19th stated that the RTM outputs had been “fixed” to the production time of the Environmental Statement. This statement makes the inconsistency in data unexplainable as far as we can see.

5 Inadequate Consultation and Refusal to Share Information

In their report and appendices for the March 19th meeting, RBC maintains that they have consulted widely (1). However, their view as to what constitutes consultation does not meet acceptable practice. For example:

- In the March 19th documentation they have merged consultation with briefing and grievance meetings where concerns were raised but not documented.
- For public consultation meetings held in 2005 where no specific records were made of the comments received, allowing officers and contractors to rely on their own subsequent impressions.
- No meaningful consultation has taken place with the business community *in time* for them to influence decision making.

RBC makes much of their willingness to answer requests for information from Wokingham DC, but refuse to share the Reading Transport Model. This seems to be a largely commercially orientated justification, which is not appropriate. As the RTM is based on Public Funding, it should be made available to neighbouring public authorities. The possibility of cross testing the RTM has been blocked by RBC and as a result an unnecessary cost for both authorities’ consultants has been caused from large amounts of debate and correspondence.

Notes

(1) Agenda 9 document for March 19th, THE ACCESS PLAN FOR READING – PROPOSED ONE-WAY INNER DISTRIBUTION ROAD (IDR) and Appendix 6.

6 Lack of Reliability in Information Provision and Independent Scrutiny

RBC claims that Faber Maunsell are *independent* scrutinisers. They have been instructed “at arm’s length” by the Council’s solicitors Bond Pearce in 2007 apparently to assess PBA’s evaluations. Essentially, they were brought in to diminish Wokingham District Council’s case for a Judicial Review. However, this is not the first time Faber Maunsell has been approached by RBC; they were *directly contracted* by Reading Borough Council prior to June 2006 (1). Therefore, the consultant had already been in a position to be influenced by RBC’s road development agenda.

The reported costs for the scheme, carried in RBC documentation, is inconsistent. 4.46 of *provisional* LTP2 states that the implementation of the one-way IDR scheme will take five years and cost in the region of £20 million. The £6.13 million costs so far described by RBC (2) do not relate to the full scheme as set out in the LTP2, for example they do not include removal of the Southampton Street flyover.

Faber Maunsell in item 4.2 of their report state “We consider that where the scheme involves flexible or reversible management measures (as opposed to large scale capital works) that we would not necessarily expect a public inquiry.” In paragraph 6.2 they state “Is the model fit for purpose for the evaluation of the One Way IDR Scheme? – Yes, given the required level of evaluation for a scheme of this nature”. Given that the scheme is not going to be readily reversible and is in large part funded outside local resources, this would seem to imply Faber Maunsell would be in favour of a Public Enquiry, if their viewpoint remains consistent.

Notes

(1) Item 5.10 in Agenda Item 11, 25 September 2006: THE ACCESS PLAN FOR READING ONE-WAY INNER DISTRIBUTION ROAD (IDR)

(2) Item 11.1 25 SEPTEMBER 2006 AGENDA ITEM: 11 THE ACCESS PLAN FOR READING ONE-WAY INNER DISTRIBUTION ROAD (IDR) and Section 16. FINANCIAL IMPLICATIONS, in 7 SEPTEMBER 2006 THE ACCESS PLAN FOR READING ONE-WAY INNER DISTRIBUTION ROAD (IDR)