

CD9.22

**Land Between Caravan Site and Watling Street,
Park Street, St Albans
(Planning Application Reference 5/2022/0267)**

**Outline application (access)
Erection of up to 95 dwellings, including 40% affordable dwellings and 5%
self-build and custom build dwellings, public open space, landscaping and
associated infrastructure**

PLANNING INSPECTORATE REFERENCE:

APPEAL REF: APP/B1930/W/24/3343986

**Rebuttal Proof of Evidence of
CLAUDIA LESLEY CURRIE
(Highways)**

1 SCOPE OF EVIDENCE

- 1.1 This Rebuttal Proof of Evidence has been prepared regarding Highways matters relating to the Proof of Evidence submitted by Rule 6 party to the Inquiry entitled *Highways, Traffic and related items* (CD11.5).
- 1.2 The purpose of this rebuttal evidence is to respond to various points made in the evidence of the Rule 6 party, to clarify points of confusion and to signpost where matters have already been dealt with in my main Proof of Evidence or its appendices. I have only addressed specific points that I consider need rebuttal, clarification, correction or signposting. Where I do not respond to a point raised by another party, my lack of response should not be construed nor interpreted as agreement, unless explicitly stated so within this Rebuttal Proof of Evidence.

2 MATTERS OF GENERAL CONCERN PREVIOUSLY ADDRESSED IN MY MAIN PROOF OF EVIDENCE

- 2.1 In response to Rule 6 Party Evidence, prepared by Nuala Webb, I have addressed the following areas in my main Proof of Evidence (CD9.3).
- *'gridlock' on Watling Street during the morning and evening rush hours.* The modelling process has been detailed in paragraphs 2.1 to 2.13 of my main Proof of Evidence.
 - *congestion and safety at the proposed site access.* Existing collision records (paragraphs 2.17 to 2.18) and the Safety Audit details (paragraphs 2.19 to 2.20) have been discussed in my main Proof of Evidence.
 - *use of 2021 traffic survey data* has been substantiated in paragraph 2.11 of my main Proof of Evidence which refers to the Technical Note (CD2.23) issued in September 2023 which compares local observed growth rates.
 - *safety of access junction and operation with Watling Street.* The operational safety of the junction has been presented in detail in the Safety Audit (CD2.24) and Designers Response (CD2.25) as discussed in paragraphs 2.19 and 2.20 of my main Proof of Evidence.
 - *pollution levels are already high at the entrance to this site. This new development would have an adverse impact on new residents, and increased waiting times will give rise to increased pollution, to the detriment of both existing and new residents.* Appendix A of my Main Proof of Evidence (CD9.6) provides a detailed Air Quality Statement.
- 2.2 In addition to the general concerns a number of further specific concerns have been raised or expanded upon by the Rule 6 Party in respect of;
- the unsuitable use of traffic data affected by COVID stay at home advice collected at 'not normal times'.
 - distances to specific local amenities.
 - ARCADY queue length modelling (with and without the development in place) and what is 'acceptable'.
 - impact of the strategic freight interchange Watling Street, the site access and Park Steet Roundabout.
 - vehicle size for tracking assessments.
 - pedestrian safety at the access junction and routes leading from the site.
 - safety issues at within the vicinity of the proposed development (BP garage, the Travellers site, or entering or leaving the various driveways on the eastern side of Watling Street)
 - additional traffic would 'render the prospect of cycling along Watling Street, highly dangerous'
 - pedestrian access around the development along a narrow track would be dangerous

Unsuitable traffic data

- 2.3 The suitability of using traffic data collected in 2021 has been questioned, both in respect of possible traffic suppression due to COVID and also that time has passed such that additional surveys 'should' have been undertaken.
- 2.4 The COVID 'stay at home' advice was not in place in November 2021 as shown in Table 1 of my main Proof of Evidence (CD9.3). However, for the avoidance of doubt of the observed traffic flow levels an additional Automatic Traffic Counter survey has been undertaken in April 2024, during school term time. This has enabled a comparison the data used in the traffic modelling to be made. I can confirm that the comparison of the 12-hour flow data shows that the future modelling assessments undertaken using ARCADY do still provide a sound basis for comparing the likely congestion at the Park Street Roundabout both with and without the traffic generated by the proposed development as the future assessments have been carried out on appropriate traffic levels.

Table 1: Traffic Flow comparison

factored 2021 flows with TEMPRO to 2026									
		WD avg	Mon	Tues	Weds	Thurs	Fri	Sat	Sun
AM peak hour									
	2016	516			516				
	2021	470	493	480	505	405	469	246	115
	2024	537	496	517	594	613	463	232	145
	2026 factored	494	518	504	531	426	493	259	121
PM peak hour									
	2016	520			520				
	2021	462	492	477	444	420	475	256	206
	2024	476	448	477	554	467	434	263	196
	2026 factored	489	521	506	471	445	503	271	218
12 hour									
	2016	5155			5155				
	2021	4597	4598	4565	4501	4576	4745	3187	2646
	2024	4941	4627	5121	5149	5127	4680	3572	2885
	2026 factored	4852	4853	4818	4750	4830	5008	3364	2793

- 2.5 Traffic data should be collected ideally in Neutral months, although other times can be used depending on need to commission surveys. However, whenever the data is collected it is always prudent to use local Automatic Traffic Count data to validate the use of any junction traffic count data which has been collected, either manually or via video camera, to ensure it is robust. This was the case for both the 2021 and 2024 data.

Distances to specific local amenities.

- 2.6 The relative location of the proposed site to local amenities has also been raised separately and in additional detail by the Rule 6 Party in the Proof of Evidence presented by Terrie Smith (CD11.9) and I have not repeated this here as the information is include in my Rebuttal evidence on the sustainability of the development site (CD9.23).

ARCADY modelling

- 2.7 The ARCADY roundabout traffic modeling programme is an accepted industry standard software package that is used to compare scenarios where junction flows and geometry can be changed. The ARCADY programme is an effective tool for demonstrating the expected changes in traffic delays, and queues, both with and without traffic from new developments. It compares the differences between the scenarios with the base reference case.
- 2.8 The future scenarios will often include committed and likely developments as agreed with the relevant Highway Authority, together with an agreed level of general background growth. This

was established through discussions with Hertfordshire County Council (CD9.16 and CD9.17) and also confirmed that no committed developments needed to be separately considered in the scenario testing.

Impact of the strategic freight interchange

- 2.9 This need to assess the strategic freight interchange as a separate modelling scenario was not requested. However, the use of TEMPRO growth to factor the observed traffic flow data with background growth would have provided a reasonable estimate of future traffic flow levels in the vicinity of the proposed development site.

Vehicle tracking assessment and pedestrian safety at the site access

- 2.10 Vehicle tracking of large vehicle maneuvers at the site access have been audited as part of the Safety Audit process and reported in the Audit (CD2.24) and the Designers Response (CD2.25), which confirms the swept path analysis of an 18T HGV's can safely access/egress the site.
- 2.11 The proposed (agreed) condition 19 for this development will ensure that all appropriate vehicle swept paths will be carried out to demonstrate compliance with all likely vehicle types. The condition reads as follows
- No development shall commence until vehicle swept path movements plans are provided for the following:*
- a. a large car accessing all car parking spaces allotted to both housing and visitor parking bays;*
- b. a fire tender vehicle accessing the site in a forward gear to all properties within the boundary of the internal road layout (once detailed under Condition 14); and*
- c a refuse vehicle accessing all properties and being able to safely and within a legal distance of resident's bin collection points for a vehicle of dimensions L:10.875m x W:2.5m*
- 2.12 As part of the Safety Audit process no specific issues were raised with respect to pedestrian safety, although it was recommended that the following issues (not concerns) should be addressed during the detailed design phase of development of the site access:
- overhanging vegetation, which will be cut back during construction.
 - consistency of installation of dropped kerbs in the area. Additional dropped kerbs to be included at the mouth of the Site Access.
 - consistency of approach into/through the site for footpaths and shared cycle paths/footways. Review completed which confirm details of shared use path within the site.

Safety issues within the vicinity of the proposed site (remote from the site access)

- 2.13 The collision data has been analysed for the study area as summarized in my main Proof of evidence (paragraphs 2.17 to 2.18) and this has not highlighted any pre-existing collision issue at any of the three locations identified in the Rule 6 Proof of Evidence, namely the BP garage, the Travellers site and driveways on the eastern side of Watling Street.

General safety of pedestrians and cyclists in and around the proposed development

- 2.14 Offsite improvements for both pedestrians and cyclists are proposed as part of the proposed development which will improve the perception of the routes that would be used for walking and cycling. However, it is not proposed that these would remove all risk from those choosing to use these routes, but that there would be a noticeably better experience in place should existing or future individuals chose to utilise these.
- 2.15 These offsite works will include:
- A toucan or tiger parallel crossing to the north of the proposed Site Access junction;

- Upgrading of footway on the eastern side of Watling Street from the proposed toucan or tiger parallel crossing to connect with the existing segregated footway / cycleway at Park Street Roundabout leading to St Albans; and
- Upgrading of the footway along the frontage of the site to a segregated footway / cycleway on the western side of Watling Street between the proposed toucan or tiger parallel crossing and using reasonable endeavours to upgrade the surface of the footway that links with Park Street Station.

Conclusion

- 2.16 It has been demonstrated that the Development site has considered the existing and future highway and traffic issues, for all modes, and that appropriate mitigation is proposed. The site is in a sustainable location with good mode choice and would allow trips to be made to/from the site without the need to use a private car for all journeys.

3 STATEMENT OF TRUTH AND DECLARATION

- 3.1 I confirm that, insofar, as the facts stated in my rebuttal evidence are within my own knowledge, I have made clear what they are, and I believe them to be true and that the opinion I have expressed represent my true and complete professional opinion.
- 3.2 I confirm that my rebuttal evidence includes all facts that I regard as being relevant to the opinions that I have expressed, and that attention is drawn to any matter which would affect the validity of those opinions
- 3.3 I confirm that my duty to the Inquiry as an expert witness overrides any duty to those instructing or paying me, and I have understood this duty and complied with it in giving my evidence impartially and objectively, and I will continue to comply with that duty as required.
- 3.4 I confirm that, in preparing this rebuttal evidence, I have assumed that same duty that would apply to me when giving my expert opinion in a court of law under oath or affirmation. I confirm that this duty overrides any duty to those instructing or pay me, and I have understood this duty and complied with it in giving my evidence impartially and objectively, and I will continue to comply with that duty as required.
- 3.5 I confirm that I have no conflicts of interest of any kind other than those already disclosed in this rebuttal evidence.

CLAUDIA CURRIE

28 August 2024