

**CD9.23**

**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**

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

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## 1 SCOPE OF EVIDENCE

- 1.1 This Rebuttal Proof of Evidence has been prepared regarding sustainability matters relating to Proof of Evidence submitted by Rule 6 party to the Inquiry.
- 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 Terrie Smith, I have addressed the overall sustainable location of the site in Paragraphs 3.2 and 3.5 of my Proof of Evidence (CD9.3). Sustainable development is universally accepted to occur when the needs of the present are met without compromising the ability of future generations (NPPF paragraph 7, CD5.3). Indeed, Hertfordshire County Council's Development Management Team and St Albans City and District Council Officers, in their consultation responses (CD3.3 paragraphs 6.13.7 to 6.13.11), have raised no concerns in respect of the accessibility of the site.
- 2.2 In addition to the general concerns a number of further specific concerns have been raised by the Rule 6 Party in respect of:
- the definition of a 'sustainable' site; and
  - distances to specific local amenities.

### ***Sustainable Site – A Definition***

- 2.3 The definition of a sustainable site has been raised and I refer to Paragraphs 7 and 8 of the NPPF (CD5.3) which details the balanced approach to be taken when looking at sustainable development sites, which state:

***The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.***

*Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using*

*natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

- 2.4 A sustainable development should therefore meet the needs of the present without compromising the ability of future generations to meet their own needs and should be reasonably accessible by all modes of transport and allow individual choice of which to use for each activity. Within the Transport Assessment (CD1.26) Section 3 it sets out the baseline conditions as a summary of the existing walking and cycling offer (paragraphs 3.4 to 3.9), the public transport offer available using buses (paragraphs 3.10 and 3.13) and the public transport offer using trains (paragraphs 3.14 to 3.15).
- 2.5 Further offsite works to improve the sustainable routes available are detailed in paragraph 3.2 of my main Proof of Evidence and copied below for ease of reference.
- 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;
  - 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; and
  - Upgrading of the bus stops located on both sides of Watling Street to the north of the site to provide shelter, seating, real time passenger information and kassel kerbs.

#### **Access and Travel Distance to Local Amenities**

- 2.6 The access arrangements to the site have been summarised by Hertfordshire County Council's Development Management Team and St Albans City and District Council Officers in their consultation responses (CD3.3 paragraphs 6.13.7 to 6.13.11), in which they have raised no concerns on the accessibility of the site.

##### Walking and cycling

*There are footways on either side of the carriageway on Watling Street. However, the footway along the eastern border of the site is narrow and overgrown for pedestrians. There are also no formal crossing facilities along Watling Street within the vicinity of the site. However, to the north of the site there is a segregated footway / cycleway which to the north leads to an underpass below the A414 providing links to St Albans.*

*There are a number of local facilities and services within the vicinity of the site including primary and secondary schools and convenience stores.*

##### Public Transport

*The nearest bus stops to the site are located on Watling Street, along the frontage of the site. These stops provide hourly services between Welwyn Garden City, Borehamwood, Hatfield and Watford.*

*The nearest train station to the site is Park Street Railway Station, approximately 450m to the south of the site. This station provides frequent services between St Albans and Watford Junction.*

- 2.7 A large number of local amenities have been provided with measured distances within the Rule 6 Party's Evidence (CD11.9) without providing the corresponding time that would be taken to travel by each available mode (walk or wheeling, cycling, car, public transport – bus). I have summarised these in Table 1 for ease of reference.
- 2.8 As an explanation of the calculation used to make these estimates I have used the industry standards used in Urban Planning – 5 minutes for walking 400m or cycle 1500m.

2.9 Table 1 identifies several amenities of relevance to the development and details the typical journey times via walking, cycling, bus, and car. Figure 1 provides a spatial visualisation of these listed amenities, with the reference numbers in the table corresponding to the labelled number of each point on the map.

**Table 1: Local amenities to the development**

Ref	Name	Type	Distance	Journey times	Details of journey
1	Filling Station shop	Small convenience store	485m	Walking – 5 mins Cycling – 2 mins Bus – N/A Car – 1 min	N/A
2	Marlborough Science Academy	Senior School	1610m	Walking – 20 mins Cycling – 8 mins Bus – 14 mins Car – 4 mins	Walking and cycling route use the underpass for the Orbital Road
3	Midway Doctor's Surgery	Doctor's surgery	2340m	Walking – 29 mins Cycling – 12 mins Bus – 24 mins Car – 6 mins	Walking and cycling route use the underpass for the Orbital Road
4	Killigrew Nursery and Junior School	Nursery and Junior School	2830m	Walking – 35 mins Cycling – 12 mins Bus – 26 mins Car – 5 mins	Walking and cycling route use the underpass for the Orbital Road
5	Park Street Station	Train Station	780m	Walking – 11 mins Cycling – 4 mins Bus – 7 mins Car – 2 mins	Travel along A5183
6	Rumbles Fish Bar	Takeaway	875m	Walking – 15 mins* Cycling – 5 mins* Bus – 8 mins Car – 4 mins*	Travel along A5183
7	Twinsco	Convenience Store	895m	Walking – 15 mins* Cycling – 5 mins* Bus – 8 mins Car – 4 mins*	Travel along A5183
8	[Holyhood Crescent Recreation Ground]	Recreation Ground	1125m	Walking – 15 mins Cycling – 5 mins Bus – 13 mins Car – 5 mins	Walking and cycling route use the underpass for the Orbital Road
9	Park Street Play Area	Recreation Ground	1015m	Walking – 18 mins* Cycling – 7 mins* Bus – 9 mins Car – 5 mins*	Travel along A5183
10	Park Street Primary School	Nursery and Junior School	1280m	Walking – 22 mins* Cycling – 7 mins* Bus – 20 mins Car – 6 mins*	N/A
11	How Wood Nursery and Junior School	Nursery and Junior School	1375m	Walking – 25 mins* Cycling – 8 mins* Bus – 12 mins Car – 5 mins*	N/A
12	Park Street Doctor's Surgery	Doctor's surgery	2100m	Walking – 39 mins Cycling – 11 mins Bus – 38 mins Car – 6 mins	N/A
13	How Wood Pharmacy	Chemist	1945m	Walking – 30 mins* Cycling – 9 mins* Bus – 11 mins Car – 5 mins	N/A
14	Co-op	Small Supermarket	1965m	Walking – 30 mins* Cycling – 9 mins* Bus – 11 mins Car – 5 mins	N/A
15	Sainsburys [and ALDI]	Large Supermarket	2250m	Walking – 27 mins Cycling – 10 mins Bus – 14 mins Car – 6 mins	N/A
16	St Albans City Station	Train Station	4000m	Walking – 53 mins Cycling – 16 mins Bus – 28 mins Car – 11 mins	N/A
17	Redlett Station	Train Station	5340m	Walking – 80 mins* Cycling – 20 mins* Bus – 27 mins Car – 12 mins*	N/A
18	[St Albans Abbey Station]	Train Station	2415m	Walking – 30 mins Cycling – 10 mins Bus – 15 mins Car – 5 mins	Walking and cycling route use the underpass for the Orbital Road

\* Indicates that journey time is estimated due to the road closure of Park Street affecting calculations  
 [] indicate that the site has been added as a key trip attractor due to proximity to site

**Figure 1: Map showing local destinations/amenities**



### ***Conclusion***

- 2.10 It has been demonstrated that the Development 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**

