CD9.3

**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

Proof of Evidence of

CLAUDIA LESLEY CURRIE

(Highways)

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1. INTRODUCTION AND QUALIFICATIONS

1.1 I am Claudia Lesley Currie and I am an Associate Director of Transport Planning at AtkinsRéalis. I joined Atkins in September 2022, which has since had a name change following a rebranding to AtkinsRéalis, which took effect from 13 September 2023. I have the following relevant qualifications and professional memberships and I am a both a Chartered Engineer (2006) and a Chartered Transport Planning Professional (2008) who also has a long-term interest in Road Safety as I am also a RoSPA trained Road Safety Engineer.

Educational Background:

- **BSc (Hons) Chemistry**
- **MSc Transportation Planning and Highway Engineering**
- **Post Graduate Diploma in Environmental Decision Making**
- **Diploma in Pollution Control**

Professional Qualifications:

- **Chartered Engineer**
- **Chartered Transport Planning Professional**

Professional memberships:

- **Fellow of the Chartered Institution of Highways and Transportation (FCIHT)**
- **Fellow of the Institution of Civil Engineers (FICE)**
- **Fellow of the Chartered Management Institute (FCMI)**
- **Fellow of Chartered Institute of Logistics and Transport (FCILT)**
- **Practitioner Member of the Institute of Environmental Management and Assessment (PIEMA)**

1.2 I have over 35 years' experience in transport planning, highway engineering and traffic modelling. In that time, I have worked in both the public and private sectors developing, reviewing and approving traffic models and highways schemes for use as part of the transport planning evidence in support, or otherwise, of strategic and local developments.

1.3 My role at AtkinsRéalis is to provide Transport Planning, Development Control and Expert Witness advice to public and private clients; develop evidence to support business cases for projects on highway and rail, and to mentor/train emerging professionals to ensure lessons learned are shared and that the knowledge base I have gained over many years is available to all. I regularly manage multi-disciplinary teams collated from across the business, and also other Consultants in Joint Ventures projects, as the needs arise.

Scope of Evidence

1.4 This Proof of Evidence has been prepared regarding highway matters relating to the Planning Application (Planning Application Reference 5/2022/026) for Land Between Caravan Site and Watling Street, Park Street [St Albans] 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. The Planning Application was submitted to St Albans City and District Council in its capacity as Local Planning Authority (**LPA**) by Mr Richard Martin as the Applicant (the **Applicant**) in February 2022. Following the Committee Decision on 19/01/24 (DC4 Refusal) the Applicant lodged an Appeal to this decision on 08/05/24.

1.5 The Planning Application is now due to be considered by an Inspector, Hollie Nicholls, at a Public Inquiry scheduled to open on 10th September 2024. This Proof of Evidence has been prepared in connection with this Appeal Inquiry for the proposed Development (the **Development**).

1.6 The purpose of my evidence is to explain the approach and methodology taken to identifying current and future traffic issues, and the operational performance of the highways surrounding the Development. I will explain the traffic modelling work undertaken and address concerns raised about the adequacy of the specific elements of the modelling undertaken during the development of the models that have been raised in the Rule 6 representations and objections.

1.7 My Proof of Evidence should be read in conjunction with other separate, but interrelated proofs of evidence submitted on behalf of the Applicant, which may have used the traffic modelling information.

1.8 I confirm that the evidence that I have prepared in respect of the Inquiry is given in accordance with the guidance of my professional institutions and I can confirm that the opinions expressed are my true and professional opinions.

Structure of Evidence

1.9 **Section 2** - Traffic Modelling Approach and Safety Assessment

This section will cover the approach to modelling and explain the nature of the flow of information and output data from the junction models. It will cover the junction model Development and will confirm their soundness for use to support the Development. This section will also include a summary of the calibration and validation of the models and report on the statistics that demonstrate that the methodology used to develop each of the supporting models is robust and that they support the Development.

Detail modelling statistics are included separately for the junctions in Atkins' Transport Assessment (TA) (CD1.26) and subsequent Addenda (CD2.13 and CD2.26).

- Original TA (dated Jan. 2022) – incl. initial modelling of proposed Site Access.
- TA Addendum 1 (dated May 2022) – response to HCC Highways comments.
- TA Addendum 2 (dated October 2022) – incl. initial modelling of Park Street Roundabout.

The final confirmation of the traffic data is included in the Traffic Impact Technical Note issued in September 2023 (CD2.23).

This section will also cover the review of the collision assessment for the surrounding area adjacent to the proposed site and will summarise the mitigation proposed for any issues identified in the independent Road Safety Audit.

Historic collision information is provided in the Transport Assessment and specific safety issues relating to the access are covered in the Road Safety Audit (CD2.24) and the Designers Response (CD2.25).

1.10 **Section 3** – Evidence Base for Response to Objectors' Points of Concern

This section will cover the evidence base that supports the main highway issues identified by the Planning Inspector in the Case Management Conference Summary Note dated 18th July 2024, noting the withdrawal of R6P 'Summary Analysis' document.

- Main issue (c) - whether the site is sustainably located in respect of its access to services and ability to minimise dependency on private vehicles;
- Main issue (d) - the effects of the proposal on the safety and efficiency of the local highway network.

In addition, from the Statement of Common / Uncommon Ground (CD12.2) Section 10 Additional Matters in Dispute with the Rule 6 Party the following highways matters (10.7 to 10.10), whether:

- The site has a sustainable location;
- The proposal has an unacceptable impact on the highway safety;
- The proposed vehicular access to the Site would be acceptable;
- The Swept Path analysis for refuse vehicles is acceptable;

Under Other Matters the potential effects of the development on air quality has been addressed as a separate written statement from Satbir Jandu of Mayer Brown (BSc MSc and full member of IES IAQM) appended to this PoE as Appendix A for ease of reference (CD9.6).

1.11 **Section 4** – Summary and Conclusions

This section will summarise this Proof of Evidence.

1.12 **Section 5** – Glossary of Technical Terms

This section lists the acronyms for the Technical Terms used throughout this Proof of Evidence.

2 TRAFFIC MODELLING APPROACH AND SAFETY ASSESSMENT

2.1 The modelling approach that has led to this Development has been developed over a number of years and has used the best traffic models available at the time. A traffic model is simply a mathematical model representation of a real-world situation. It is used to provide an estimate of the likely future outcome based on the best available historic and forecast data, together with an understanding of the way drivers are likely to make their decisions for each journey (trip) that they will make on the roads included within the model boundaries (network). All traffic models consist of a matrix of trips and a network of roads.

2.2 Models can be strategic in nature and used to support the development of Local Plans to help make strategic transport decisions, or more detailed where scheme refinement occurs, or finally with extreme detail coded in where the junction type and operational effects would be determined. These three types of models will be needed at different times of the decision-making process, but all will need to be developed in order to support the final scheme to be delivered. Each model is used to inform the more detailed model that follow. They will be updated as appropriate and will refine the network detail used to ensure the best available evidence is available to support the decision-making process required. For any future scenario the modelling effort needs to be proportionate to the scale of a potential intervention.

2.3 Public Transport service provisions which cover the study area of interest have been separately considered in support of the provision and use of sustainable transport modes; bus, rail, walking, cycling and wheeling (push chairs, scooters, wheelchairs). No mode transfer effects have been modelled for the existing observed traffic, nor have they been for the development traffic. Any new residents moving to the Development site will be provided with information on the mode choice options available to them. A Travel Plan Framework (CD1.20 and CD2.9) was included in support of this Development with a fully fleshed out Travel Plan to be supplied as a required condition for the Development.

2.4 The traffic modelling that has been carried out for the Development has been done ensuring that the best available traffic data has been used in the decision-making process.

Standalone junction modelling (Junctions 9)

2.5 The impacts on the capacity of the proposed Site Access and Park Street Roundabout were assessed using industry-standard software tools. Priority Junctions and Roundabouts are assessed using the Junctions 9 software package, developed by TRL Software. Junctions 9 was the version of the software current at the time the capacity assessments were undertaken. Junctions 9 consists of ARCADY (the Roundabout module) and PICADY (the Priority Junction module). The two modules are used to model and predict capacity, queues and delays at junctions. Inputs to the models are the junction geometry, the proportion of Heavy Goods Vehicle in the vehicle mix and vehicle turning movements for each scenario. Junction geometry for the proposed access junction was taken from the design drawings and for existing junction was measured from OS mapping.

2.6 The key outputs from Junctions 9 include the Ratio of Flow to Capacity (RFC), Level of Service (LOS) and the average queue length which are reported for each arm of the junction. An RFC value of 0.85, or below, indicates that the arm is operating within expected design capacity. An RFC value of 0.85 to 1.00 indicates that the arm is operating above design capacity, but within theoretical capacity, while an RFC value of 1.00 or more indicates that the arm is operating above theoretical capacity and significant queuing and delays may occur when additional pressures are put on the junction.

2.7 Detailed junction models were developed from observed traffic data collected in November 2021(CD1.26 para 6.12 and is Appended in Annex A) supplemented with the predicted developments trips derived from the Industry Standard TRICS database 7.8.2 as detailed in Section 5 of the Transport Assessment (CD1.26). This was supplemented with mode share choices from the National Travel Survey and Journey to Work 2011 Census Data for St Albans, which remains the current Government advice. This ensures that all the modelling carried out to support this Development is consistent and robust. The junction modelling provides clarity on the operational performance of the existing key junctions under different modelling scenarios.

2.8 The results are also summarised in Table 6.1 of the Transport Assessment (CD1.26) for the new Site Access junction and in Table 2.1 of the Transport Assessment Addendum 2 (CD2.26) for the Park Street Roundabout.

2.9 The detailed results of the capacity assessments of the Site Access have been presented in the Transport Assessment (CD1.26 Appendix G) which shows that there are no anticipated queues or delays as a result of this proposed Development in either the morning AM (08:00 to 09:00) or evening PM (17:00 to 18:00) peak hours. The prevailing peak hours were identified from the ATC data collected in November 2021. The future year was based on the original anticipated Opening Year of 2026 (5 years post application) and that no Committed Developments or associated Highway Improvements have been highlighted by either the District or County Council for inclusion in the supporting traffic modelling assessment.

2.10 The detailed results of the capacity assessments of the Park Street Roundabout have been presented in the Transport Assessment Addendum 2 (CD2.26 Appendix B) which shows the modelled queues and delays in 2021 and in 2026, both with and without the Development in place. For the 2026 baseline comparison the existing observed traffic flows were increased in level by industry standard TEMPRO growth factors, known as the background uplift. This shows that the modelled queues and delays in the AM peak hour are well below the design capacity of the Roundabout and that, only on occasion, will the PM peak hour operate above its expected design capacity (RFC value of 0.96). At no time does the Park Street Roundabout operate above its theoretical capacity (RFC above 1.0) and this level is not exceeded either with or without the proposed Development in place. In addition, the difference in the modelled queue lengths is less than one vehicle (PCU) which would be an imperceptible change in traffic levels at this location.

2.11 In order to validate the use of the TEMPRO growth rates used in the modelling assessment (Paragraph 6.12 of the Transport Assessment CD1.26) a separate Technical Note was issued in September 2023 (CD2.23) comparing the observed growth rates at a nearby DfT monitored ATC site (Ref 78319) between 2016 and 2021 which shows a decrease of 12 percentage points in traffic volumes. Figure 1 shows the annual flow totals at DfT monitored sites within the surrounding area, which all show traffic remains increasing year on year, but with a pause during the COVID period.

2.12 Despite the apparent dip in traffic flow figures during the COVID period (see Figure 2) the three national lockdowns that occurred seem to have paused traffic growth which seems to be increasing broadly in line with TEMPRO growth, although approximately 2 years behind where it would have been expected prior to the COVID pandemic. The traffic data collection carried out in November 2021 occurred when travel movements were no longer restricted. In order to account for any COVID suppression of traffic flows, the observed 2021 junction count data has been increased by 5.09% in the AM peak hour and 5.99% in the AM peak hour.

2.13 The validation of each model process is an important step in ensuring that the model used at each level is performing to an acceptable level of accuracy and allows good certainty of the results from the model. The individual junction assessments included in the Transport Assessment and Addendum (CD1.26 and CD2.26) use queue lengths to validate the models. Additionally, the junction models have been verified as part of the Planning Application process, such that no highway concerns were raised with the

modelling process as stated in the Highway Authority Consultation Response dated August 2022 (CD3.2 pages 51 to 56).

2.14 Further, Hertfordshire Council Development Management Group's response in their letter of 21st December 2023 (included in CD3.3 pages 88 to 105), confirmed the positive outcome to their audit checks of additional modelling information of the Park Street Roundabout and therefore did not wish to raise an objection, subject to the inclusive planning conditions, information, obligations and agreements.

Highway Mitigation

2.15 The Transport Assessment (CD1.26) and its Addenda (CD2.13 and CD2.26) have shown that no highway improvements are needed at the Park Street Roundabout to mitigate for the Development. However, it should be noted that the Roundabout will become a signalised gyratory in the near future as it is a condition of the Planning Applliction for the Rail Freight Terminal (Outline 5/09/0708 – Condition 4). This was reconfirmed in Planning Application 5/2019/0787 in which the trigger points were extended due to delays in the proposal which was finally given the go-ahead in June 2024 when a High Court dismissed the need for a Judicial Review into that Application.

2.16 It should also be noted that Hertfordshire County Council confirmed in September 2022 that the provisional timescale for these committed highway improvements to be implemented was starting on site in 2024 with completion expected in 2026.

Collison Assessment

2.17 An areawide summary of the latest available five years of collision records (December 2014 to 2019) was included in the Transport Assessment (CD1.26). The majority of the collisions recorded were classified by DfT as slight (86%). No particular pattern of collisions was identified that would suggest specific safety mitigation is needed on the Park Street Roundabout. The majority of collisions occurred in daylight hours (76%) and in dry conditions (72%).

2.18 Further collision analysis over an extended time period (2018 to 2021) has been undertaken on Watling Street and this is summarised in Table 3.1 and are located on Figure 3.1 of the Transport Assessment Addendum (CD2.13). Five collisions were identified of which two were classified as Serious in 2018 and 2019, the remaining three were classified as slight with one also occurring in 2019 and two in June 2020. No collisions have been recorded immediately adjacent to the proposed Site Access which would be constructed to have the required visibility envelopes for the posted 30mph speed limit on Watling Street (*DMRB document references CD109 Table 2.10 and CD123 paragraph 3.1*) - 90m measured at a setback of 4.5m for design speed 60kph).

Road Safety Audit

2.19 An independent Road Safety Audit was commissioned in October 2023 on the Site Access junction design for the proposed Development (CD2.24). This was carried out in accordance with GG119 and raised only four 'problems' which can all be mitigated in the detailed design phase and no 'concerns' were raised. All the problems raised have been accepted and actioned in the Designers Response (CD2.25).

2.20 In summary the 'problems' included:

- overhanging vegetation, which will be cut back during construction;
- potential central island kerb issues for removal lorries. Additional swept path analysis confirms 18T HGV's can access/egress the site safely;

- 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 confirms details of shared use path within the site.

Traffic Impact, Highway Mitigation and Safety Analysis Conclusion

2.21 Therefore, I am satisfied that the individual modelling process is sound and that the information it provides is a realistic assessment of the future operation of the junctions modelled and that the Development will not cause any perceptible impact on the existing highway network.

2.22 I am also satisfied that there is no justification for highway mitigation as a result of this proposed Development as the impact on the surrounding network is minimal and under the NPPF test would be classed as negligible.

2.23 I am also satisfied that the safety aspects relating to the site are sound and that the information provided in support of the Development will not cause any detrimental safety impact on the existing highway network.

2.24 This development does not cause an unacceptable impact on highway safety and the residual cumulative impacts on the road network have been shown to be minimal, which is in accordance with NPPF paragraph 115.

Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

2.25 The development proposal has also considered opportunities for utilising and promoting sustainable transport modes, alongside providing a suitable safe access which is in accordance with NPPF paragraph 114.

(a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; and (b) safe and suitable access to the site can be achieved for all users.

3 EVIDENCE BASE FOR RESPONSE TO OBJECTORS' POINTS OF CONCERN

3.1 This section will cover the evidence base that supports the main highway issues identified by the Planning Inspector in the Case Management Conference Summary Note dated 18th July 2024, noting the withdrawal of R6P 'Summary Analysis' document.

- Main issue (c) - whether the site is sustainably located in respect of its access to services and ability to minimise dependency on private vehicles;
- Main issue (d) - the effects of the proposal on the safety and efficiency of the local highway network.

Under Other Matters the potential effects of the development on air quality have been addressed as a separate written statement from Satbir Jandu of Mayer Brown (BSc MSc and full member of IES IAQM) appended to this PoE as Appendix A for ease of reference (CD9.6).

In addition, from the Statement of Common / Uncommon Ground (CD12.2) Section 10 Additional Matters in Dispute with the Rule 6 Party the following highways matters (10.7 to 10.10), whether:

- The site has a sustainable location;
- The proposal has an unacceptable impact on the highway safety;
- The proposed vehicular access to the Site would be acceptable;
- The Swept Path analysis for refuse vehicles is acceptable;

Sustainable Location

3.2 In terms of transport accessibility, the Development site is located with good public transport links to both bus and rail which can be accessed without the need to utilise a car to leave the Development site. As part of the proposed Development the following Active Travel improvements are proposed, and would be conditioned, to support the existing infrastructure.

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;
- 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.

3.3 Within the Transport Assessment (CD 1.26) Section 3 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).

3.4 Hertfordshire Development Management Team and the City and District Council, in their consultation responses (CD3.3 paragraphs 6.13.7 to 6.13.11), have raised no concerns on the accessibility of the Development site, which they have summarised under accessibility as follows:

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.

3.5 Therefore, it has been demonstrated that the Development site is in a sustainable location and would allow trips to be made to/from the site without the need to use a private car.

Highway Operation

3.6 The operation of the highway has been detailed in the supporting transport and highway evidence accompanying the Planning Application (CD1.26, CD2.13 and CD2.26) and is summarised above in Section 2. The evidence presented has demonstrated that the existing highway, and in particular Park Street Roundabout, works within its existing capacity constraints both with and without the Development.

3.7 In addition, the local highway network adjacent to the proposed development does not currently exhibit any safety concerns that could be exacerbated by a small increase in traffic volumes (only 49 to 51 two-way movements in the peak hours) from the proposed Development site.

3.8 Hertfordshire Development Management Team and the City and District Council, in their consultation responses (CD3.3 pages 88 to 105), have raised no objections to the highway information presented in support of this proposed Development.

3.9 Data collected from the DfT's dataset of Automatic Traffic Counters shows that there is little difference in traffic flows pre and post COVID/Brexit as the growth has continued following the initial dip when growth was 'paused'. Therefore, there are no additional modelling tests that need to be carried out as the modelled scenario is accepted by both Highway Authorities as a test of the 'worst case'.

3.10 Therefore, it has been demonstrated that no safety or efficiency of operation issues will be caused by the Development.

Vehicular access to the Site

3.11 The vehicle access to the site have been designed to appreciate highways standards for the speed and class of the highway (Design Manual for Roads and Bridges and Manual for Streets).

3.12 The collision analysis for the area demonstrates that there is no pre-existing collision issue in the area that would be exacerbated by the negligible increase in traffic flows that would result from this Development.

3.13 An independent Road Safety Audit was commissioned in October 2023 on the Site Access junction design for the Development (CD2.24). This was carried out in accordance with GG119 and raised only two 'problems' linked to the design which can

both be mitigated in the detailed design phase and no ‘concerns’ were raised. The problems raised have been accepted and actioned in the Designers Response (CD2.25).

3.14 In summary the ‘problems’ relighting to design:

- 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.

Swept Path analysis for refuse vehicles is acceptable.

3.15 The swept analysis for the Site Access has been completed for a refuse vehicle (9.93m Standard Refuse vehicle) and is shown in Appendix D of the Transport Assessment (CD1.26) as being acceptable.

3.16 An independent Road Safety Audit was commissioned in October 2023 on the Site Access junction design for the proposed Development (CD2.24). This was carried out in accordance with GG119 and raised only one ‘problem’ linked to the vehicle tracking and no ‘concerns’ were raised. This problem raised highlighted a potential issue with the central island kerb tracking for removal lorries, which has been accepted and actioned in the Designers Response (CD2.25).

3.17 The Designers Response (CD2.25) includes the swept path analysis for an 18T Heavy Good Vehicle (HGV) tracking in Appendix B which is also shown is acceptable.

4 SUMMARY AND CONCLUSIONS

4.1 This Proof of Evidence has demonstrated how the traffic modelling has been appropriately developed, using industry standard modelling software packages and using appropriate methodologies. It has also explained the check and review processes carried out on the output of those models (calibration and validation) which are required to ensure the models are robust and that the decisions made, based on their output information, are sound.

4.2 The results of the capacity assessments have been presented in the Transport Assessment and Addenda (CD1.26, CD2.13 and CD2.26) to demonstrate the impact of the Development on the Park Street Roundabout and the access to the site. The impacts on the capacity of proposed junctions were assessed using industry-standard software tools. Priority Junctions and Roundabouts were assessed using the Junctions 9 software package, developed by TRL.

4.3 As explained in the above sections the validation of each model process is an important step in ensuring that the model used at each level is performing to an acceptable level of accuracy and allows good certainty of the results from the model. Additionally, the junction models have been verified as part of the Planning Application, such that no highway concerns were raised (CD3.3 paragraph 6.13.101), and therefore, I am satisfied that the individual junction modelling process is sound and that the information they provide is a realistic assessment of the future operation of the junctions modelled.

4.4 The Transport Assessment and Addenda (CD1.26, CD2.13 and CD2.26) show that the network operates in 2026 with the Development in place in a similar way to 2021 and in addition it does not aim to provide unlimited highway capacity for cars or to remove all congestion.

4.5 The modelling has been reviewed by the LPA's Transport Development Management Control teams as the Highway Authority, they found it to be sufficiently robust and recommended the supporting highway evidence within the Planning Application was acceptable. The network operates in 2026 with the Development in place in a similar way to 2021 and it has not aimed to provide unlimited highway capacity for cars or to remove all congestion, but is testing a worst-case scenario

4.6 The Transport Assessments (CD1.26 and 2.26) show that there are no highway safety concerns in respect to the Site Access.

4.7 The Development site has been reviewed by the LPA's Transport Development Management Control teams as the Highway Authority. They found it to be in a sufficiently accessible location and recommended the Planning Application could be approved subject to a number of conditions and Planning Authority Committee. This is concluded in the Committee Report January 2024 (CD3.3 paragraph 6.13.101).

4.8 Additional highway and safety issues raised by the Rule 6 Party have been addressed and shown not to raise concerns for this Development in respect to whether:

- The site has a sustainable location;
- The proposal has an unacceptable impact on the highway safety;
- The proposed vehicular access to the Site would be acceptable;
- The Swept Path analysis for refuse vehicles is acceptable.

4.9 The concerns raised in respect of emissions and air quality have been addressed via a separate statement appended to my Proof of Evidence in Appendix A (CD9.6). However, during the Planning Application consultation process no environmental compliance concerns were raised in respect of Air Quality and a series of conditions are detailed in the relevant Committee Report (CD3.3 paragraphs 6.22 - conditions).

5 GLOSSARY OF TECHNICAL TERMS

DfT	Department for Transport
DMRB	Design Manual for Roads and Bridges
LOS	Level of Service
LPA	Local Planning Authority
OS	Ordnance Survey
PCU	Passenger Car Unit
RFC	Ratio of Flow to Capacity
RoSPA	The Royal Society for the Prevention of Accidents
TA	Transport Assessment
TRL	Transport Research Laboratory

Computer Software Packages (acronym or name)

ARCADY	Assessment of Roundabout Capacity and Delay, included in **JUNCTIONS 9**
PICADY	Priority Intersection Capacity and Delay, included in **JUNCTIONS 9**

Open-Source National Traffic Data Sets

TEMPRO

Census 2011

DfT Automatic Traffic Count Data

6 STATEMENT OF TRUTH AND DECLARATION

6.1 I confirm that, insofar, as the facts stated in my Proof of Evidence are within my own knowledge, I have made clear which they are and that I believe them to be true and that the opinion I have expressed represent my true and complete professional opinion.

6.2 I confirm that my Proof of Evidence includes all facts that I regard as being relevant to the opinions that I have expressed and that attention has been drawn to any matter which would affect the validity of those opinions.

6.3 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.

6.4 I confirm that, in preparing this Proof of 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 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.

6.5 I confirm that I have no conflicts of interest of any kind other than those already disclosed in this Proof of Evidence.

CLAUDIA LESLEY CURRIE

13 August 2024

Figure 1 – DfT Count Sites surrounding Park Street Roundabout

Figure 1-1 – All motor vehicles for traffic count site 6149

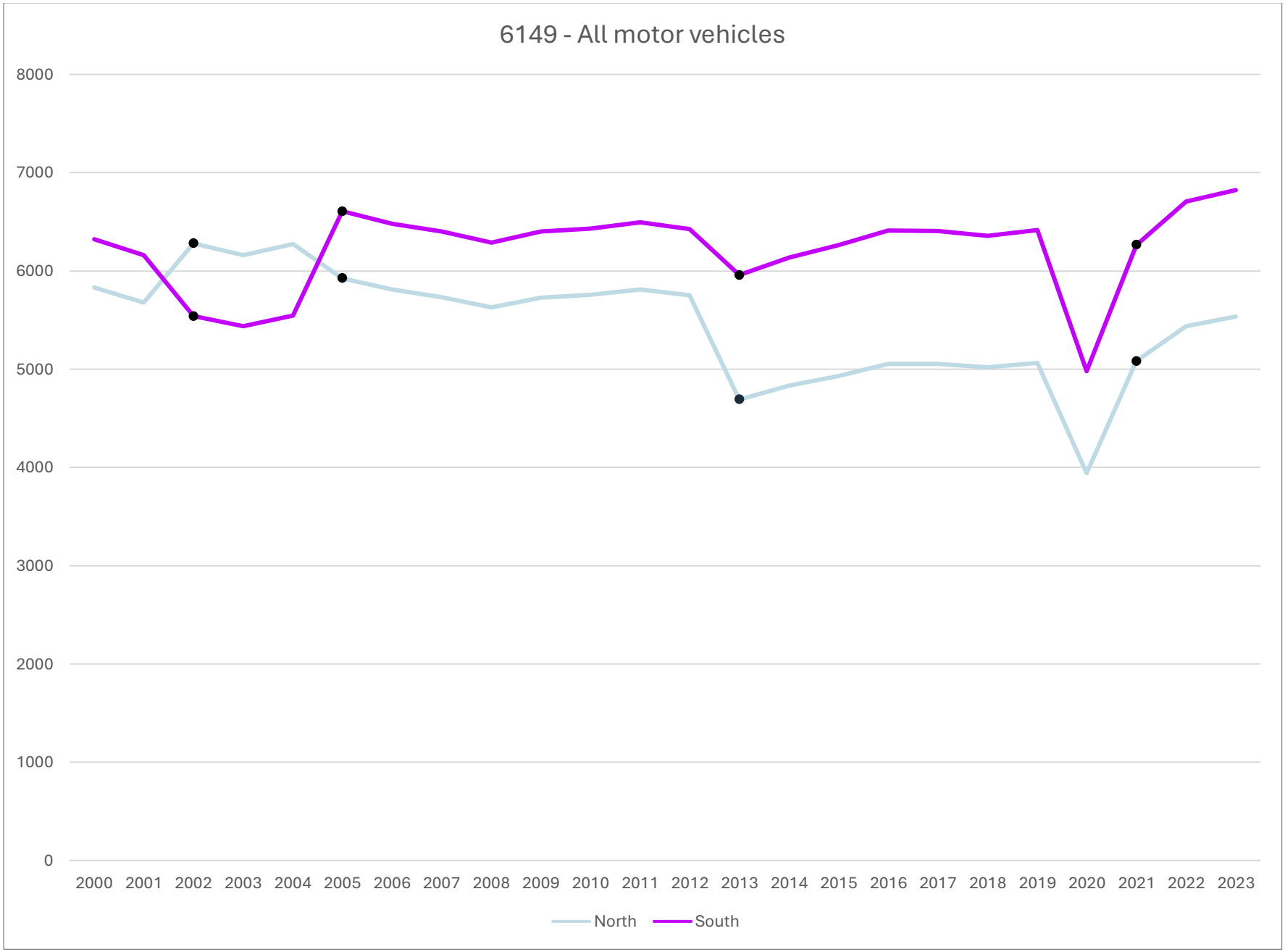


Figure 1-2 – All motor vehicles for traffic count site 47089

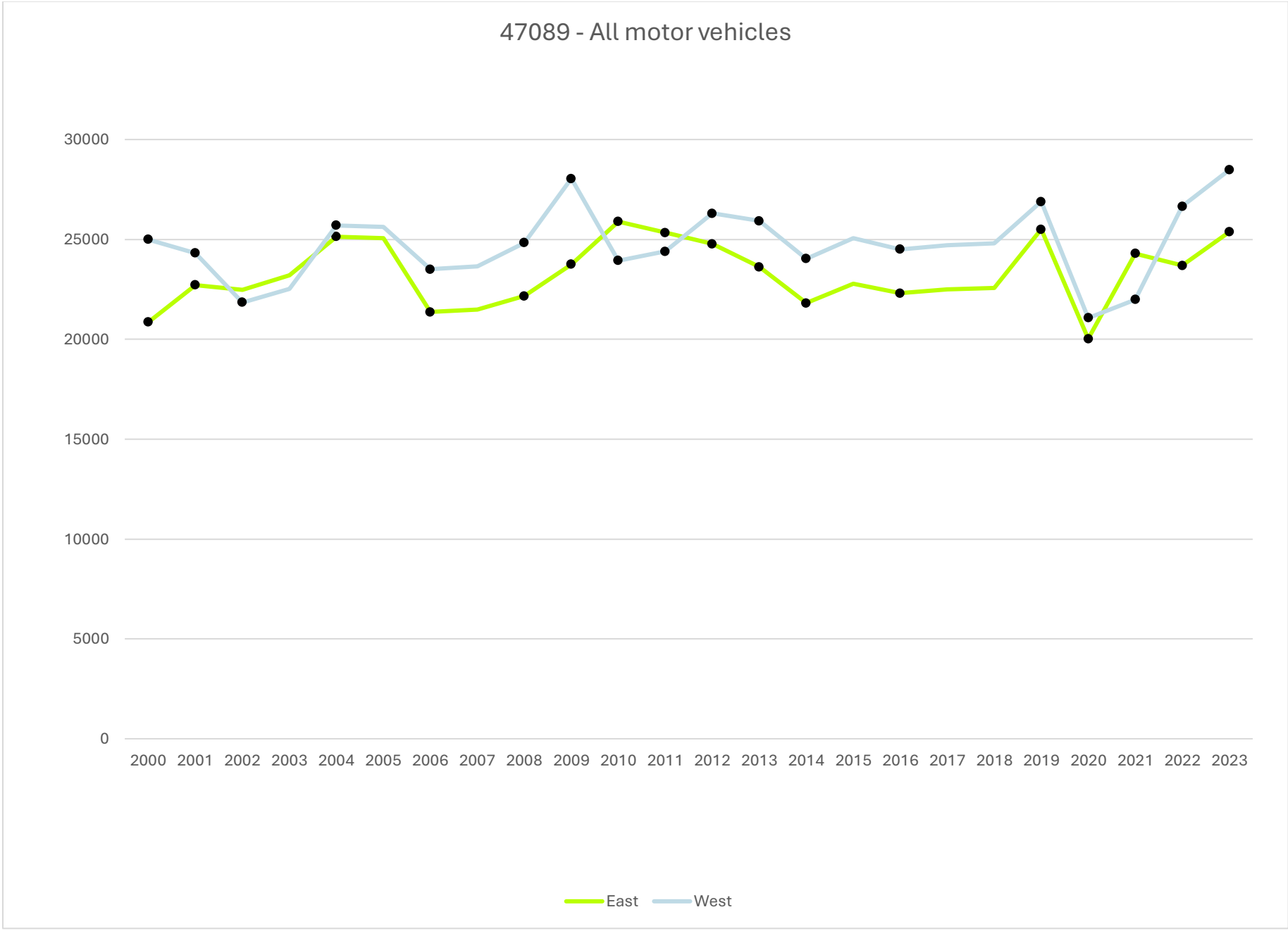


Figure 1-3 – All motor vehicles for traffic count site 78320

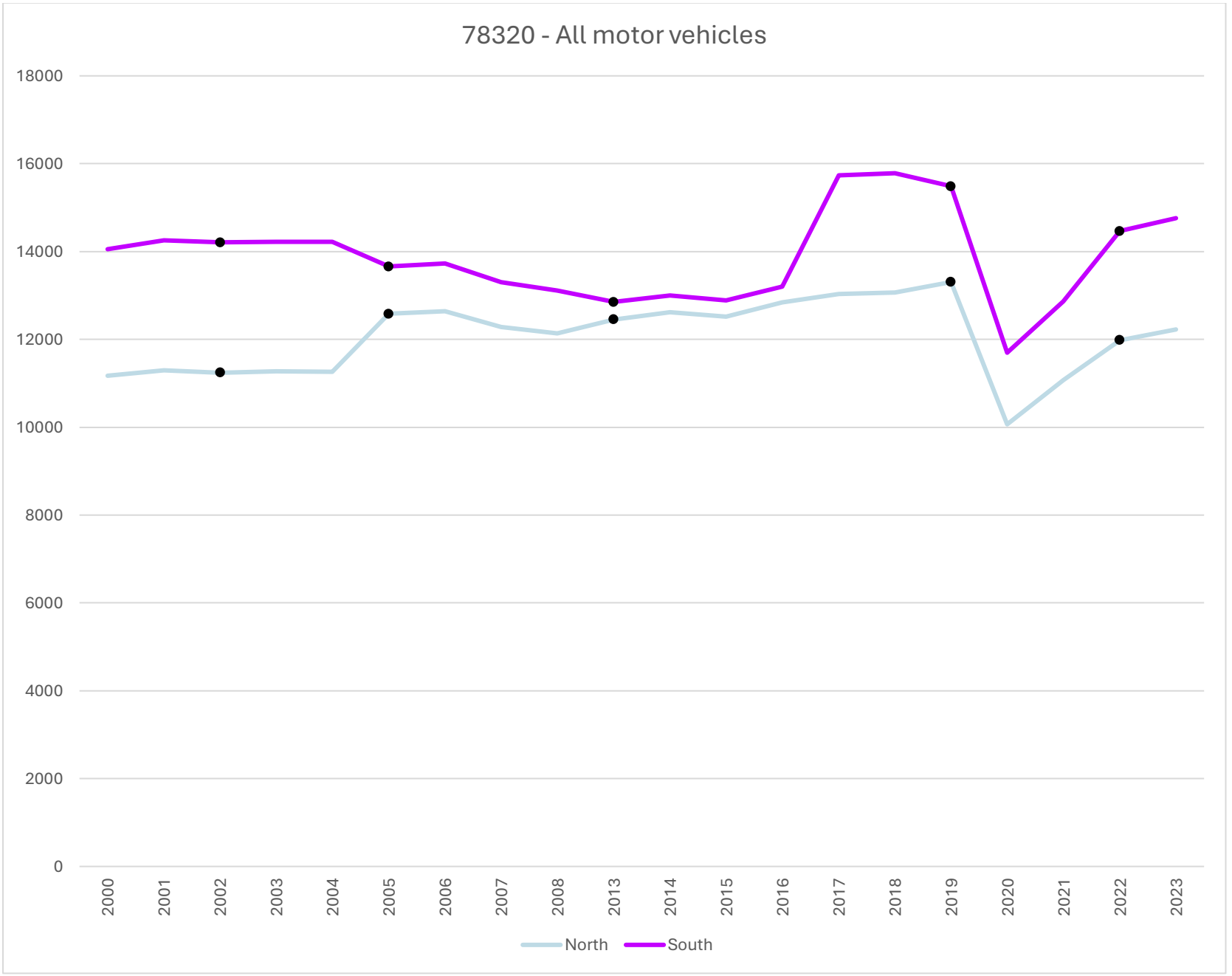


Figure 1-4 – All motor vehicles for traffic count site 84029

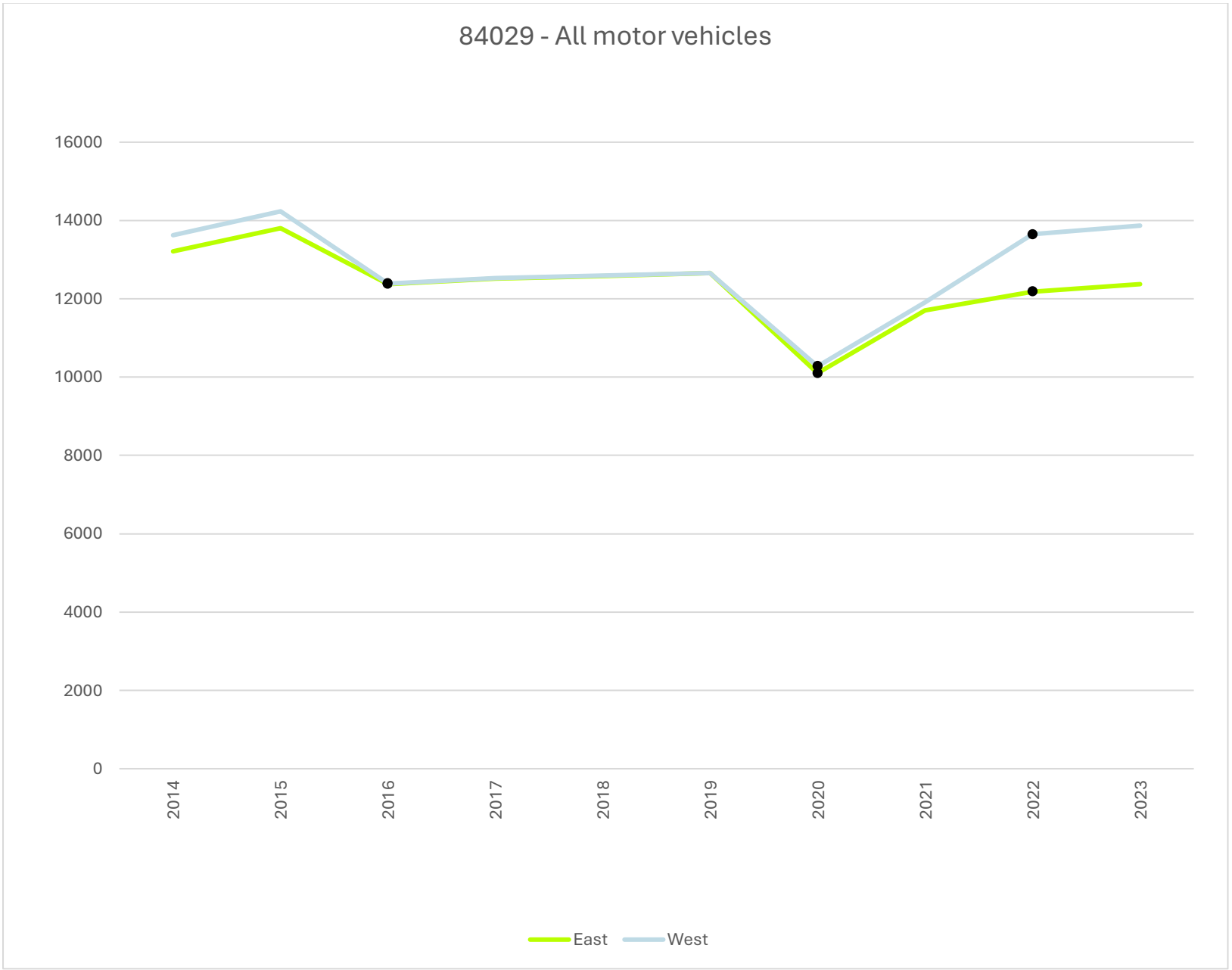


Figure 1-5 – All motor vehicles for traffic count site 806244

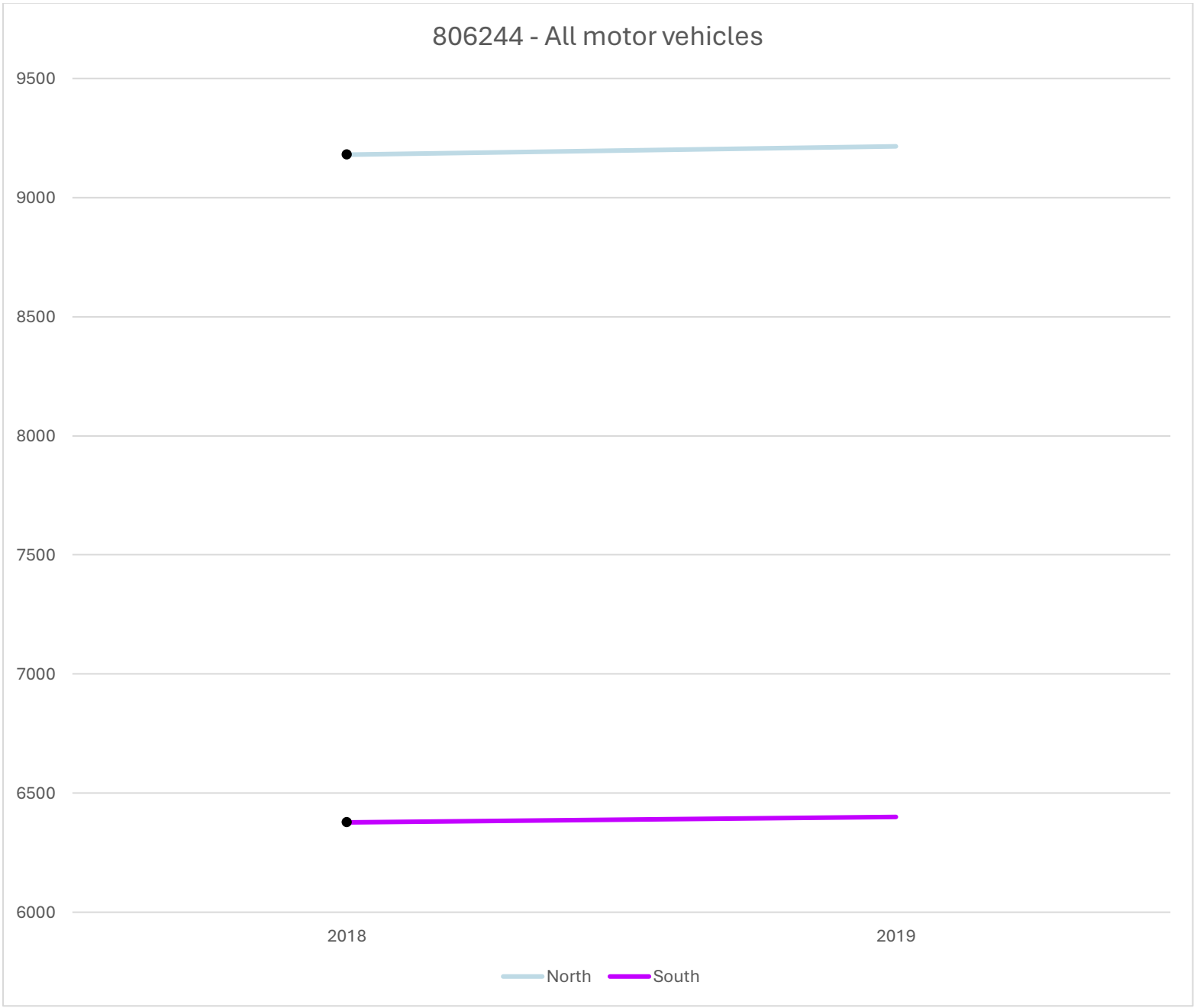


Figure 1-6 – All motor vehicles for traffic count site 78319

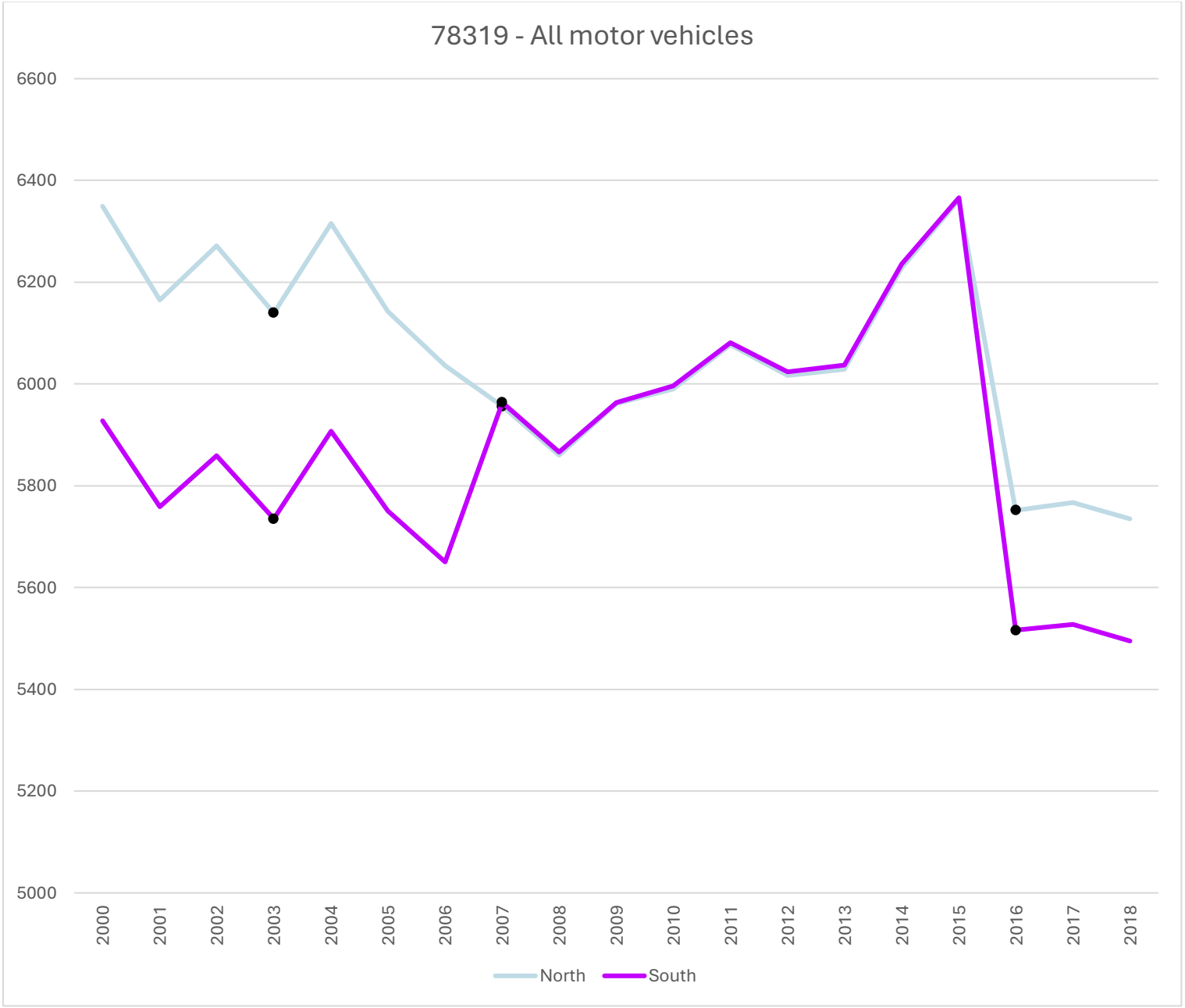
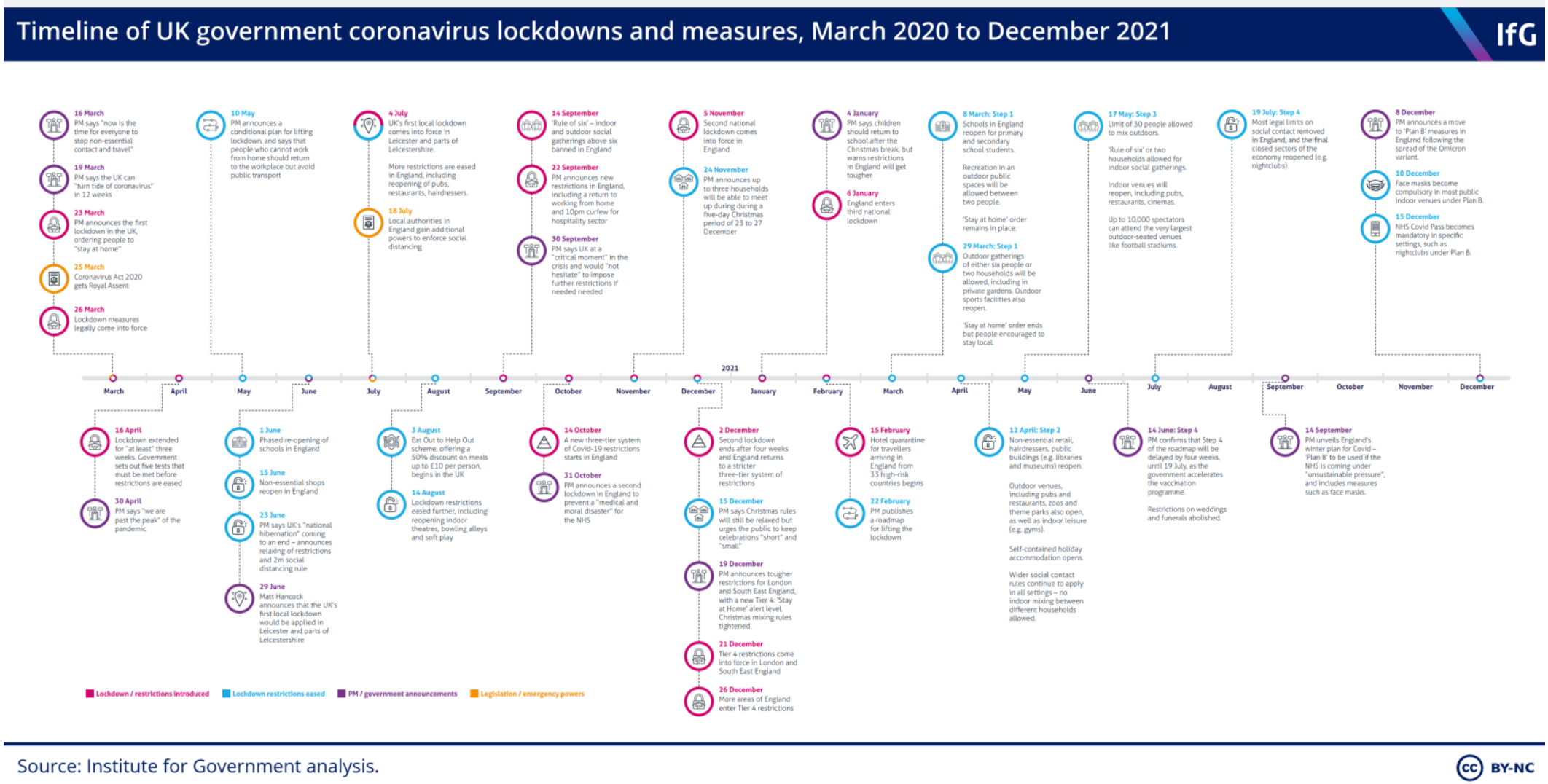


Figure 2 COVID Timeline



Source: Institute for Government analysis.

Appendix A
Air Quality Statement by

Satbir Jandu of Mayer Brown

July 2024

CD9.6

M SCOTT PROPERTIES LTD
PROPOSED RESIDENTIAL DEVELOPMENT
LAND WEST OF WATLING STREET, PARK STREET

AIR QUALITY TECHNICAL NOTE

JULY 2024

M SCOTT PROPERTIES LTD
PROPOSED RESIDENTIAL DEVELOPMENT
LAND WEST OF WATLING STREET, PARK STREET

AIR QUALITY TECHNICAL NOTE

JULY 2024

Project Code:	**Park Street (A)9.2**
Prepared by:	**Satbir Jandu MIEnvSc, MIAQM**
Issue Date:	**30th July 2024**
Status:	**ISSUED**

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1 Introduction

1.1 Mayer Brown Limited has been commissioned by M Scott Properties Ltd to produce a technical response to air quality comments made by the Rule 6 Party in relation to Appeal reference APP/B1930/W/24/3343986. The proposed development lies on a parcel of land to the West of Watling Street in Park Street, St Albans and does not sit in an Air Quality Management Area (AQMA).

1.2 The proposed development consists of:

"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"

1.3 Outline planning permission (22/0267) was most recently refused by St Albans City & District Council (SACDC) Planning Committee on 15/01/2024, despite recommendations from SACDC planning officers that approval be granted, subject to conditions.

1.4 This technical note has been authored by Satbir Jandu, air quality consultant at Mayer Brown. Satbir holds a BSc in Forensic Biology and an MSc in Air Pollution Management & Control. He is a full member of both the Institute of Environmental Sciences (IES) and the Institute of Air Quality Management (IAQM). Satbir has over eleven years' experience within the field of air quality consultancy and also worked part time as a planning officer for two years.

2 Rule 6 Party Comments: Air Quality

2.1 The Rule 6 Party has made the below comments with regards to air quality:

"3.7: The level of pollution at the access point to the site (AL2 2NN) is already extremely high, being at 80 percentile, which is within the top 20 most polluted addresses in the UK. Data provided by Imperial College, London gives the following levels for this location; $PM_{2.5}$: 11.49mcg/m^3 (The WHO limit is 5mcg/m^3); PM_{10}: 18.10mcg/m^3 (The limit is 15mcg/m^3)+; NO_2: 23.46mcg/m^3 (The limit is 10mcg/m^3)#.*

3.7.1 : The Clean Air (Human Rights) Bill, known as Ella's Law, would establish a right to clean air and compel local authorities to bring air quality up to minimum WHO standards within five years. Whilst this bill was not enacted in the last parliament and requires inclusion within the government timetable, the pressure to act exists, which will have a direct effect on Local Authorities, who will be compelled to take action.

3.7.2 : Irrespective of the status of Ella's Law, the action of Local Authorities allowing housing developments to be built in the highest polluted areas of their districts, would signal a disregard to their obligations and could give rise to liability issues in the light of Ella Kissi-Debrah's death. The High Court ruling against the Greater London Authority and Transport for London, and subsequent Coroner's report set a precedent.

3.7.3 : The Coroner's Prevention of Future Death's Report stated; "In my opinion there is a risk that future deaths could occur unless action is taken". One suspects that the action he was suggesting to be taken wasn't along the lines of building housing developments alongside existing queuing traffic, in locations which already generate the highest pollution levels in the country."

3 Technical Response

3.1 Under the Air Quality Strategy, there is a duty on all Local Authorities to consider the air quality within their boundaries and prepare an annual update report. If there are exceedances, the Local Authority should declare an AQMA and produce an action plan for improving air quality.

3.2 As set out in the introduction, the site does not lie within any declared AQMA. The nearest AQMA is in excess of 1.6km to the south of the proposed development site, adjacent to the M25.

3.3 Concentrations of all pollutants at the site are expected to meet the UK Air Quality Objectives, which are legally binding in the UK. The World Health Organization (WHO) Air Quality Guidelines referred to by the Rule 6 Party in his comments hold no legal weight in the UK planning process.

3.4 The WHO states:

"The World Health Organization's Air quality guidelines (AQG) serve as a global target for national, regional and city governments to work towards improving their citizen's health by reducing air pollution." [1]

3.5 Furthermore, the Environmental Health Officer (EHO) at SACDC raised no concerns around air quality in either their pre-application or application consultee responses and deemed the proposals acceptable in that regard.

3.6 The IAQM & Environmental Protection UK (EPUK) have published guidance *Land-Use Planning & Development Control: Planning for Air Quality (2017)*[2].

3.7 This document provides advice and guidance to ensure that air quality is adequately considered in the land-use planning and development control processes. This is particularly applicable to assessing the effect of changes in exposure of members of the public resulting from residential and mixed-use developments, especially those within urban areas where air quality is poorer.

3.8 The IAQM & EPUK guidance contains indicative criteria for determining when a detailed air quality assessment in required. These criteria are outlined below.

[1] https://www.who.int/news-room/feature-stories/detail/what-are-the-who-air-quality-guidelines
[2] Environmental Protection UK & Institute of Air Quality Management (EPUK & IAQM) (2017) Land-Use Planning & Development Control: Planning for Air Quality, EPUK & IAQM, London

Table 6.2: Indicative criteria for requiring an air quality assessment

The development will:	Indicative Criteria to Proceed to an Air Quality Assessment [a]
1. Cause a significant change in Light Duty Vehicle (LDV) traffic flows on local roads with relevant receptors. (LDV = cars and small vans <3.5t gross vehicle weight).	A change of LDV flows of: - more than 100 AADT within or adjacent to an AQMA - more than 500 AADT elsewhere.
2. Cause a significant change in Heavy Duty Vehicle (HDV) flows on local roads with relevant receptors. (HDV = goods vehicles + buses >3.5t gross vehicle weight).	A change of HDV flows of: - more than 25 AADT within or adjacent to an AQMA - more than 100 AADT elsewhere.
3. Realign roads, i.e. changing the proximity of receptors to traffic lanes.	Where the change is 5m or more and the road is within an AQMA.
4. Introduce a new junction or remove an existing junction near to relevant receptors.	Applies to junctions that cause traffic to significantly change vehicle accelerate/decelerate, e.g. traffic lights, or roundabouts.
5. Introduce or change a bus station.	Where bus flows will change by: - more than 25 AADT within or adjacent to an AQMA - more than 100 AADT elsewhere.
6. Have an underground car park with extraction system.	The ventilation extract for the car park will be within 20 m of a relevant receptor. Coupled with the car park having more than 100 movements per day (total in and out).
7. Have one or more substantial combustion processes, where there is a risk of impacts at relevant receptors. NB. this includes combustion plant associated with standby emergency generators (typically associated with centralised energy centres) and shipping.	Typically, any combustion plant where the single or combined NO_x emission rate is less than 5 mg/sec[a] is unlikely to give rise to impacts, provided that the emissions are released from a vent or stack in a location and at a height that provides adequate dispersion. In situations where the emissions are released close to buildings with relevant receptors, or where the dispersion of the plume may be adversely affected by the size and/or height of adjacent buildings (including situations where the stack height is lower than the receptor) then consideration will need to be given to potential impacts at much lower emission rates. Conversely, where existing nitrogen dioxide concentrations are low, and where the dispersion conditions are favourable, a much higher emission rate may be acceptable.

3.9 None of the indicative criteria outlined above will be triggered and as such, a detailed assessment of air quality was not required.

3.10 In conclusion, it can be demonstrated that:

- The site does not sit within, or adjacent to, a designated AQMA;
- The SACDC EHO made no objection to the development proposals in respect of Air Quality;
- The WHO guidelines referred to by the Rule 6 party hold no weight within the current planning system.

3.11 Giving due consideration to the above, it is plain that the proposed development did not need to be the subject of an air quality assessment as the proposals will not give rise to any material air quality impacts. Consequently, SACDC were correct not to object to the proposed development on the grounds of air quality.