



Town & Country Planning
Act 1990 (as Amended)

Appeal by Headlands
Way Limited

Land North of Chiswell
Green Lane, Chiswell
Green, St Albans
Hertfordshire, AL2 3AJ

Rebuttal Statement by M Stevens
MCIHT on behalf of Headlands
Way Limited

PINS Ref: APP/B1930/W/22/3312277

LPA Ref: 5/2021/3194

Date of Inquiry: 17-21 and 24-26
April 2023

April 2023

MILESTONE
TRANSPORT PLANNING

Land North of Chiswell Green Lane, Chiswell Green, St Albans, Hertfordshire AL2 3AJ

Project No: MTP Ref: 22-185
Document Reference No: 22-185 / Reports / Rebuttal Statement
Document Title: Rebuttal Statement
Date: April 2023
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Document history and status

Revision	Date	Description	Prepared By	Checked By	Authorised By
-	04/04/2023	V1 – for client comment	M. Stevens	M. Stevens	M. Stevens
A	05/04/2023	V2 – For Issue	M. Stevens	M. Stevens	M. Stevens

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1. Introduction

1.1 This rebuttal statement is in response to the Proofs of Evidence ("PoEs"), as itemised below, prepared on behalf of Keep Chiswell Green ("KCG") as a Rule 6 party in respect of the conjoined Appeal Sites (PINS Refs: APP/B1930/W/22/3312277 Land to North of Chiswell Green Lane, Chiswell Green, St, Albans and APP/B1930/W/22/3313110 Land to South of Chiswell Green Lane, Chiswell Green, St, Albans).

- [PoE of David Walpole BSc\(Hons\) CivEng MCIHT;](#)
- [Submission for Keep Chiswell Green Rule 6 Party by Stuart Fray BSc](#)
- [The impact of traffic generated by The Strategic Rail Freight Interchange: PoE by Michael Sault CEng, FIET](#)
- [Local Transport Survey: PoE by Shirani St Ledger McCarthy](#)

1.2 Matters raised within the above documentation in respect of highway matters are considered within the following section of my rebuttal statement.

1.3 I make clear at the outset of this rebuttal that neither Hertfordshire County Council ("HCC"), as Local Highway Authority, National Highways, as Strategic Highway Authority, nor St Albans City & District Council ("SADC"), as Local Planning Authority, object to the proposed development of Land to the North of Chiswell Green Lane, in support of which my evidence is directed on highway grounds. To the extent that KCG do, they are therefore departing not only from my expert view, but the expert view of those Authorities also.

1.4 To the extent that KCG are also raising matters related to the impacts of the conjoined Appeal Sites together, I also make it clear that the two Appeals are entirely separate. However, and for the reasons identified below, there are no highway reasons why they could not both proceed.

2. Matters Arising from Rule 6 Party Proofs of Evidence

Overview

2.1 The Planning Inspectorate has received four PoEs relating to the Rule 6 party's case. The following paragraphs deal with each of the highways and transport matters raised within the PoEs, noting that where there is commonality in the themes raised, these are dealt with together.

Accessibility

2.2 Giving due credence to the National Design Guide and its definition of 'walkable' as being those facilities within 800 metres or 10 minutes' walk of a given Site, the following, as acknowledged by David Walpole, are within a walkable distance of the conjoined Appeal Sites:

- [Co-op Foodstore](#)
- [Simmons Bakers](#)
- [Watford Rd Post Office](#)
- [Globe Pharmacy](#)
- [Chiswell Green Livery & Riding School](#)

2.3 Whilst pedestrian accessibility has been assessed within the original Transport Assessment ("TA") / Transport Assessment Addendum ("TAA") submissions against the widely regarded industry standard thresholds for maximum travel distances by foot of 2.0 kilometres (Chartered Institute of Highways & Transportation ("CIHT")), it is noteworthy that 5 of the 9 amenities identified and agreed within 2.0 kilometres, are also accessible within 800 metres or less distance.

2.4 The potential provision of a school on the conjoined Appeal Site (PINS Ref: APP/B1930/W/22/3313110) should not be overlooked, which would offer a further key amenity within 800 metres.

2.5 Further amenities within the 2.0 kilometre walk distance are as below:

- [Killigrew Primary and Nursery School](#)
- [Homewood United Reformed Church](#)

- Midway Surgery
- Greenwood Park & Lawn Tennis Club

- 2.6 Site accessibility also needs to be considered in the context of all sustainable modes and it is therefore important to consider those facilities easily reachable by cycle or bus, as well as by foot.
- 2.7 In these regards, topography is only one measure that determines whether someone will choose to cycle (as highlighted in the PoE of David Walpole). The availability of high quality infrastructure is also a key determinant. The provision of routes for cyclists along Chiswell Green Lane and Watford Road should not be dismissed on the basis that a limited number of Chiswell Green residents cycled to work in the 2021 Census.
- 2.8 The suite of infrastructure upgrades for cyclists offered by the conjoined Appeal Sites will not only present opportunities for travel to and from work destinations but also local amenities that may be beyond the 800 metre or 2.0 kilometre thresholds for walking e.g. St Colomba's College, The Marlborough Science Academy or Westminster Lodge Leisure Centre.
- 2.9 As set out in my PoE (March 2023), proximity of a Site to local bus stops is not the only factor to be considered when considering the attractiveness of travel by this mode. The following extract from the CIHT document 'Buses in Urban Developments' (2018) is reiterated:
- "The acceptability of the walking distance is not a stand-alone consideration. People take account of the total journey travel time, including the 'in bus' time as well as the walk at either end. Consequently, people will accept longer walks to reach bus services that are fast and direct, or more frequent, and to stops serving a wider range of destinations".*
- 2.10 On the basis that the conjoined Appeal Sites are offering considerable future investment in upgrading, enhancing, and securing the long-term viability of future bus service provision, as agreed with HCC, as Highway Authority, it is concluded that future residents will have safe and direct access to fast, direct, frequent bus services that connect with key destinations within St Albans and Watford and surrounding districts.
- 2.11 The accessibility principles of the conjoined Appeal Sites have been fully assessed during the planning application process and agreed with HCC.

Trip Forecasts and Travel Plan Modal Split Targets

- 2.12 The trip generation and modal split outputs included in the TA that accompanied the original Planning Application, and reflected in the Residential Travel Plan, were agreed with both HCC Highways and National Highways, and form a baseline from which a modal shift away from car dependency is targeted.
- 2.13 The suite of infrastructure enhancements proposed by the Applicant (northern Site) in the form of footway / cycleway provision on Chiswell Green Lane, upgrades to Public Rights of Way 080/082 and cycle lane markings on Watford Road, teamed with comprehensive Travel Planning measures including provision of an E-bike for all households and free monthly bus tickets / vouchers, make the Travel Plan targets and reduced car dependency at the Sites eminently achievable. This has been agreed with HCC Highways.
- 2.14 This investments in active travel mode infrastructure enhancements, as well as enhanced bus services, will benefit the wider population of Chiswell Green, not that those would will live within the conjoined Appeal schemes.

Forecast Traffic Impacts at Double-Mini Roundabout

- 2.15 Traffic impacts at the junction of Watford Road with Chiswell Green Lane and Tippetdell Lane have been comprehensively addressed in the TA / TAA and Appeal Site PoE submissions from a technical and planning policy perspective. This is largely based on the HCC agreed principle of a hierarchical approach where so long as highway safety is not compromised, the operational capacity of the local highway network is given less weight than the need to maximise opportunities to address the needs of other road users, i.e. active travel (walking and cycling) and passenger transport modes.
- 2.16 In consideration of the cumulative impacts of the conjoined Appeal Sites at the double mini-roundabout, it is recognised that significant increases in queues and delay could occur. However, substantial active travel interventions and contributions have been agreed with HCC Highways to address the cumulative impacts of the conjoined Appeal Sites.
- 2.17 If the Inspector felt that additional interventions are warranted to address cumulative impacts, it is noted that Glanville's, in relation to the conjoined Appeal Site (PINS Ref: APP/B1930/W/22/3313110) have presented a signalisation scheme of the double mini-roundabout designed in accordance with CD123 of the Design Manual for Roads and Bridges that is deliverable within adopted highway extents.

- 2.18 Glanville's PoE presents the design and junction modelling outputs where it is forecast that the signalised junction will operate similarly to the double mini-roundabout junction for a 2027 design year without development.
- 2.19 In respect of highway safety, as evidenced in my PoE, detailed analysis of road safety data supplied by HCC for assessment purposes determined that the causation of the incidents that have occurred in the Site vicinity were mainly down to human error rather than any deficiencies in the geometric design or operational characteristics of the roads themselves.
- 2.20 As agreed with HCC, there is no evidence to suggest that any increased traffic demand attributable to the conjoined Appeal Sites will exacerbate the road safety record.

Chiswell Green Lane

- 2.21 As stated in my PoE the character of Chiswell Green Lane to the west of the village will be preserved and protected, whilst the place function of Chiswell Green Lane will be maintained through the provision of off-site infrastructure improvements including the shared footway/cycleway on the northern side of the road, regulation of on-street parking and introduction of traffic calming measures including raised table provision at the junction with Stanley Avenue.
- 2.22 Raised table provision is a universally recognised form of speed restriction, and has been agreed with HCC, serving to limit vehicle speeds through the junction of Chiswell Green Lane with Stanley Avenue and thus reducing the attractiveness of Stanley Avenue as a 'rat run'.
- 2.23 In respect of the carrying capacity of a single 3m wide shared footway / cycleway; Local Transport Note (LTN) 1/20 prescribes in Table 6.5.7 that such provision is suitable to accommodate up to 300 pedestrians and 300 cyclists per hour. As evidenced through the trip generation sections of the TAs for the conjoined Appeal Sites, and making allowance for existing movements, there is more than sufficient capacity over a single shared route to cater for prospective trips and encourage shift to sustainable travel modes.
- 2.24 The movement of pedestrians between the northern and southern sides of Chiswell Green Lane is also aided by the provision of safe crossing facilities with tactile paving to the east of the secondary access to the southern Appeal Site.

Traffic Survey / Photographic Evidence

- 2.25 With regard to the photographic evidence of congestion and parking practices on the highway network surrounding the Site, as presented by Stuart Fray on behalf of KCG, such images and commentary have not been independently collected or verified and do not represent substantiated evidence of such practices occurring at any frequency.
- 2.26 On this basis, no links can be made or conclusions drawn in respect of the development proposals at the conjoined Appeal Sites.
- 2.27 The results of the questionnaire survey posed to Chiswell Green residents and presented in the PoE of Shirani St Ledger McCarthy are not independent in nature and such findings cannot be deemed valid.
- 2.28 Such a lack of validity is evidenced through assertions such as personal injury accident analysis where 34% of 186 respondents (63) are said to have experienced road traffic incidents within Chiswell Green, with 40% (25) said to have occurred at the double-mini roundabout junction of Watford road with Chiswell Green Lane and Tippendell Lane.
- 2.29 On the basis of the accident records held by the HCC and analysed in the Appeal Site TAs, such occurrences, unless occurring over extreme periods of time, cannot be substantiated.

Rail Freight Terminal Traffic

- 2.30 Consideration of the impacts of traffic generated by the Radlett rail freight terminal proposal formed part of pre-application engagement with and were agreed by HCC Highways, and National Highways, prior to the preparation of the Appeal Site TA's.
- 2.31 On review of the approved submission material relating to planning application (Reference: 5/09/0708) for the approved rail freight interchange, public open space, and community forest sites, off the A406 North Orbital Road, it was concluded that the development proposal would not have a material impact on the local highway network comprising the study area of the conjoined Appeal Sites and including the B4630 Watford Road. This position was agreed with HCC.
- 2.32 It should be noted that the TEMPRO database was used within the Appeal Site TA's to apply industry standard growth rates to surveyed traffic flows to a future year (5-years post submission of the application, i.e., 2026) for junction assessment purposes.

2.33 The growth rates embody traffic associated with a predicted increase in housing / employment over such a period (as informed by local planning policy) and would therefore take account of any minor light vehicle trip generation associated to the rail freight terminal proposal that could route via roads in and around Chiswell Green.

3. Summary & Conclusions

3.1 This rebuttal statement has been prepared in response to the PoEs prepared on behalf of Keep Chiswell Green (KCG) as a Rule 6 party.

3.2 Through my PoE and the contents of this rebuttal statement, the following has been demonstrated:

- Future residents within the conjoined Appeal Sites will have a genuine choice of transport modes available to reach local amenities and facilities. Infrastructure improvements delivered by the conjoined Appeal Sites will further enhance connectivity and opportunities for modal shift away from private car use;
- The investment in pedestrian and cycle facilities, as well as enhanced bus services, will benefit the wider population of Chiswell Green, not just those that will live within the Appeal schemes;
- Robust trip forecasts have been established through the Appeal Site TA and TAA submissions and agreed with HCC Highways, as well as National Highways, recognising that baseline modal splits provide the opportunity for a positive shift in travel behaviour, as a consequence of the interventions proposed through 'hard' infrastructural and 'soft' travel planning measures delivered by the conjoined Appeal Sites;
- The traffic impacts at local junctions have been comprehensively addressed in the conjoined Appeal Site TA and TAA submissions whereby the principle of providing enhanced sustainable modes connections has been given greater weight than junction capacity improvements by HCC Highways, in reflection of wider national and local policy objectives.
- If required, to further address the cumulative impacts of the conjoined Appeal Sites, a signalisation scheme of the double mini-roundabout of Watford Road with Chiswell Green Lane and Tippendell Lane can be delivered within the adopted highway extents that would operate similarly to the double mini-roundabout junction for a 2027 design year without development;

- The character of Chiswell Green Lane to the west of the village will be preserved and protected, whilst the place function of Chiswell Green Lane will be maintained through the provision of off-site infrastructure improvements. This includes the shared footway/cycleway to the north of Chiswell Green Lane and safe crossing provision that meet the design and capacity requirements of LTN1/20.
- Traffic questionnaire surveys and photographic records provided by the Rule 6 party have not been independently collected or verified nor can links be made or conclusions drawn relating to the development proposals at the conjoined Appeal Sites in question;
- The impacts of traffic generated by the Radlett rail freight terminal in respect of the conjoined Appeal Sites has been fully scoped with HCC Highways, and National Highways, and agreement reached on baseline traffic flows for assessment purposes.