

Town and Country Planning Act 1990
Planning and Compulsory Purchase Act 2004

Appeal by Tarmac

***Land at Colney Heath,
St Albans***

Rebuttal Proof of Evidence on Transport and Accessibility

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on behalf of the Appellant

PINS Ref: APP/B1930/W/23/3333685

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Transport Planning Consultants

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1.0 Scope and Nature of Evidence

1.1 This rebuttal evidence has been prepared on behalf of the Appellant in support of its appeal against the refusal by St Albans City & District Council of an application for:

“Outline application (means of access sought) for up to 45 dwellings including new affordable homes, with areas of landscaping and public open space, including points of access, and associated infrastructure works”.

1.2 In their Rule 6 Statement of Case (“SOC”), (CD7.3), Colney Heath Parish Council (“CHPC”) set out in Section 6, their concerns about highway safety in respect of interaction of the proposals with the adjacent primary school. Whilst there is some reference to traffic volumes on the local roads elsewhere in the SOC, they have produced a more substantial Proof of Evidence (CD9.11c) which goes beyond that position.

1.3 As set out in my own proof of evidence the application was reviewed in detail by Hertfordshire County Council (“HCC”) as the (statutory) Local Highway Authority (“LHA”) and they raise no objection to the application, subject to conditions and S106 contributions – all of which are agreeable to the Appellant. This review included matters of highway safety, traffic impact and accessibility.

1.4 This rebuttal therefore responds to the additional points raised in the proof of evidence of the CHPC, where it is not explicitly already covered in Section 8 of my proof (CD 9.4). It should be noted that lack of comment on any particular point should not be interpreted as agreement to it.

2.0 Traffic Generated by the Site and Traffic Impact issues

2.1 At Paragraph 5 and 6 the CHPC assert that the forecast development demand is low. For the avoidance of doubt the trip rates (as set out in CD4.18 Section 4.1) follow the appropriate approach using the industry standard TRICS database and were agreed with HCC as the LHA. Whilst trip rates will vary between sites and indeed individual houses, they provide a broad sample of households, and should be considered representative.

2.2 Contrary to CHPCs assertion, the comparison sites in TRICS do not include locations with



- high levels of public transport use. Based on the TRICS sample adopted (CD9.4 Appendix D Page 15 (pdf page 132)) only 1-2 public transport trips are forecast in the peak hours. It is reasonably expected this will occur from the appeal site for journey to school trips.
- 2.3 No adjustments are appropriate to account for the location relative to London. The traffic surveys reported in the Transport Assessment show traditional network peak hours on the High Street, i.e. 8am to 9am and 5pm to 6pm. Reductions in forecast demand could be appropriate if the peaks were broader and earlier. These have not been applied and hence the forecasts are robust.
- 2.4 The selection of comparison sites in TRICS was based on “private houses” only which typically results in higher rates than mixed, social or retirement housing. No reduction was made to reflect the significant proportion of affordable houses (40%) proposed on the site.
- 2.5 Notwithstanding this, even if it were accepted that higher trip rates should be adopted this would have no material impact on the outcome of the agreed assessment with the LHA (and LPA). An increase in say 20% of trips would only result in 5 additional trips per hour. This is not material in the context of the flows on the High Street which are at present over 600 vehicles per hour.
- 2.6 On street parking within a built-up area such as on the High Street is common (CHPC para 7-11). Whilst it delays through traffic and reduces the capacity of the High Street it is arguably not a strategic route for which these are priorities. The development will make no material difference either way.
- 2.7 The development will not result in an increase in Heavy Goods Vehicles (CHPC para 11-12). There will be occasional HGVs during the relatively short, 6-12 months, construction phase otherwise largest vehicles requiring access to the site will be refuse collection vehicles which will already be on the local roads serving the existing built development and perhaps the occasions removals lorry.
- 2.8 As set out in Section 6 of my proof there is clearly, and demonstrably, no wider impact arising from the development in the context of the established Policy tests set out in the



National Planning Policy Framework (“NPPF”). There are no highway safety or capacity issues on the wider network that should be addressed as part of the consideration of this Inquiry.

3.0 Wider Implications

3.1 At Paragraphs 1 – 3 the Parish highlight concerns over road safety on a wider range of roads. For the reasons set out above, the change travel demand from the development is not sufficient to have a no material bearing on wider patterns.

3.2 “Bowmans Cross” (Para 3) is a potential strategic Local Plan allocation but it is not relevant to this Inquiry as it is not certain. Whilst such sites are considered in HCC strategic planning tools such as the COMET (CHPC para 50-58) these outputs should not be interpreted as deterministic, i.e. it shows how the demand would manifest on the existing transport network if no changes or transport planning decisions are made. The site has however no formal status and if it did come forward the scheme promotor, the LPA and LHA would clearly need to consider its traffic implications, including whether it was appropriate in network management terms to route additional traffic through Colney Heath, and if so to mitigate its impacts.

3.3 So far as they are relevant the other existing uses on the wider network are covered in the Transport Assessment (Reference CD4.18 Section 2.3) by virtue of the fact that traffic generated by them will be included in the base line traffic counts.

3.4 Appendix A of CD9.11c contains Crashmap plots for the last 20 years. Whilst the data is not disputed, it is not relevant to the Inquiry as it is not presented in context of the proposed development.

3.5 Guidance on Transport Assessment is set out in the Planning Practise Guidance issued by DLUHC on 6th March 2014. This confirms that the Transport Statement (TS) should include:

“an analysis of the injury accident records on the public highway in the vicinity of the site access for the most recent 3-year period, or 5-year period if the proposed site has been identified as within a high accident area”.



Paragraph: 015 Reference ID: 42-015-20140306

3.6 The TS considers accidents at Section 2.4 for a five-year period. There have been no recorded personal injury accidents in the area of influence of the site access in the last five years.

4.0 Car Parking at the School / Football Club

4.1 It is noted that the CHPC assessment of the potential car parking capacity of the Football Club car park is based on Rochford District Council standards (which have a 2.9m wide bay size). The reason provided for this approach by CHPC is that St Albans do not have standards. However, the Local Highway Authority (HCC) in this instance, *do* have standards as part of their Place & Movement Planning and Design Guide for Hertfordshire as adopted on 18th March 2024. This guidance confirms the appropriate parking space size is 2.5m x 5.0m.

4.2 CHPC therefore, in adopting the wrong standard, under-estimate the capacity of the football club car park. Based on the CHPC dimensions (72.8m x 17.1m) of the car parking area and the HCC design width of 2.5m wide space means the football club car park has space for 29 cars on the north east side and 27 on the south west side. A total of 56 spaces is therefore available on the football club car park (compared with CHPC para 33 assessment of 48 spaces).

4.3 The proposed access arrangements themselves in providing a road to the site, would clearly change car parking options within the access road corridor. This equates to around 15 spaces lost (areas 8 and 9) if the LHA restrict on-street parking on this section. Ultimately as it will likely be an adopted road, HCC may choose to allow retained parking for school drop off and pick on this section. Approximately 20 spaces are retained on the northern side of the access road as existing.

4.4 The total available number of spaces is therefore at least 76 with the scheme in place. The most recent survey (See Appendix SJT8 of **CD 9.4**) show total demand was 37 spaces in the morning (08.50 and 60 in the PM peak (15.20). There is therefore demonstrably spare capacity.

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- 4.5 CHPC makes significant play of parking related to the football club uses. The examples given are on a Sunday (4th February 2024) and a Saturday (22nd May 2021), which do not occur during school opening times.
- 4.6 The fact that the CHPC, with no doubt significant local knowledge, identify only two days over a three year period of this occurrence does not support the suggestion this is a recurring issue which requires mitigation. It is clear from the accident assessment (see above) that these situations have not led to any identifiable highway safety harms.
- 4.7 There is a suggestion at Para 37 that the site itself might not provide for adequate on-site spaces. Clearly the application is in outline and at the Reserved Matters ("RM") stage this would need proper consideration but the site is capable of providing sufficient spaces for residents' own needs.

5.0 Access to Land Beyond Development

- 5.1 This is set out in Paras 47 – 49. Clearly there is no proposal for further development being served from the proposed access. If it were at some point in the future that would need to be subject to the appropriate assessment, considering the tests set out in the NPPF at that time.

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