## **ACTION 4 ALDERHOLT**

# Planning appeal for P/OUT/2023/01166

Rebuttal Proof of Evidence on Transport and Highways

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## **CONTENTS**

1	INTRODUCTION	1
2	EXISTING CONDITIONS	1
3	ACCESS ROAD LINKS	2
4	STATEMENT OF TRUTH	5

#### 1 INTRODUCTION

- I am Colin English, a local resident, and I have prepared this rebuttal evidence on Highways and Transportation on behalf of Action 4 Alderholt (A4A). I address two issues raised by Paul Basham Associates in their proof of evidence document number 132.0001/POE/3.
- 1.2 The PBA evidence presented by Mr Rand largely repeats statements made in their earlier assessments; however, some points are made which I consider should be rebutted.

#### 2 EXISTING CONDITIONS

- At paragraph 2.11 of his evidence Mr Rand states: The proposed development would significantly improve the sustainability of Alderholt, through the provision of additional facilities that would reduce the need to travel. The likelihood of any of the proposed services actually being delivered is dealt with by others, but the claim that this would "significantly improve the sustainability of Alderholt" is simply wrong. Part of the justification for this claim is the reference to the limited services listed in the Statement of Common Ground, which plays down the services currently available. There are many other local services that are valued by the community. The SoCG does not mention the following services:
  - ➤ Alderholt Motors (car repairs and MOTs)
  - ➤ Post Office (open 0700 to 2200 seven days per week)
  - ➤ Wolvercroft garden centre
  - Sticky Bun Café.
  - > Thai restaurant and takeaway
  - ➤ Groundwise (earthworks, landscaping and plant hire)
  - Ocean Vets
  - ➤ Reading rooms provides a meeting space and coffee shop
  - ➤ Mobile fish and chip van (2 days per week)
  - ➤ Mobile pizza van
  - ➤ Bearhouse Saddlery
  - ➤ Florist (JoJo Blooms)
  - ➤ Mucky Pups (dog grooming)
  - Kingswood Day Nursery
  - ➤ Kalista Aesthetics
  - ➤ Moonacre Massage Therapy
  - ➤ Herrington Coaches
  - Caravan and camping sites (including Hill Cottage Farm, Foxhill Farm and Warren Park Farm

In addition, there are numerous small businesses offering for example building and garden services. It follows that there is already a far greater degree of sustainability than assumed by Mr Rand and while additional services would not harm sustainability, it cannot reasonably be claimed that they would significantly improve sustainability.

#### 3 ACCESS ROAD LINKS

- 3.1 Mr Rand states at paragraph 3.17 that PBA carried out a review of the ability of vehicles to pass on the access roads was included in their Transport Assessment. I note that this was carried out by reference to the Manual for Streets (MfS) and I set out several reasons why this document was inappropriate for the assessment of rural roads. The use of this document is particularly puzzling since there is advice available on minimum widths for vehicle passing on rural roads. The UK government is responsible for the largest civil engineering project in Europe and through a series of HS2 Hybrid Bills it has approved a comprehensive guide for design of all aspects of its project and this includes rural roads.
- I note that the MfS is also a government document, having been published by the Department for Transport in 2007. However, the MfS states that: It is the responsibility of users of MfS to ensure that its application to the design of streets not specifically covered is appropriate. I can find no evidence that Mr Rand has followed this requirement. It is clear that safe road widths was not an aspect of the MfS advice that was considered to be transferable to rural roads because it differs substantially from the government's specific requirements on rural road widths. I find it inexplicable and unacceptable that PBA has chosen to ignore the specific requirements for rural road widths.
- 3.3 The HS2 railway inevitably crosses a large number of roads which necessitates their diversion and reconstruction. In its *Technical Standard Roads (dated July 2015) Appendix C HS2 rural road design criteria* rules are set out for the dimensions and geometry of rural roads with the key data presented in boxes. I reproduce the relevant boxes below. At paragraph C.6.2 it states that for 2 lane carriageways:
  - C.6.2 Realigned or diverted rural roads should generally match the existing, subject to a minimum of 5.5 metres (the minimum for two cars to pass in safety at low speed). This minimum width shall be increased to 6.0 metres for lengths with occasional use by buses or heavy goods vehicles and 6.8 metres for roads where buses or heavy goods vehicles are likely to pass each other on a regular basis.

#### And for single track roads:

C.6.6	For safety reasons, the normal width of single-track roads shall be 3.5 metres (above which
	the risk of uncertainty increases about whether two vehicles can pass each other over a length
(3	without passing places).

C.6.7	Inter-visible passing places must be provided on single-track roads at a maximum spacing of 200 metres.
C.6.8	The combined width of single-track road plus passing bay shall be 5.5 metres over a length of 5 metres (or 15 metres where likely to be used by buses or heavy goods vehicles). 5 metre long tapers shall be provided at each end.
C.6.9	The carriageway width across overbridges and through underbridges on single-track roads shall be 5.5 metres, using road markings to give a centred 3.5 metre running lane to discourage a sudden increase in traffic speed or unsafe overtaking manoeuvres. Inter-visible passing places shall be provided at each end of the structure.

### For verges it notes:

C.6.10	The minimum width of verges shall be 1.5 metres, or 2.5 metres where a road restraint system is involved.
C.6.11	The verge width provided for the road shall continue across all overbridges and underbridges.

3.4 Comparison of the Government's requirements for rural roads with the passing width data given in the MfS reveals substantial differences. The HS2 design requires a minimum width of not less than 5.5 m for two cars to pass safely whereas Mr Rand has used just 4.1 m. The HS2 design requires a minimum width of not less than 6 m for a car and a bus to pass to pass safely whereas Mr Rand has used just 4.8 m. The HS2 design requires a minimum width of not less than 6.8 m for two HGVs to pass safely whereas Mr Rand has used just 5.5 m. I summarise these differences in the table below. These differences are very large and their significance cannot be ignored.

Vehicle use	MfS (m)	HS2 (m)	Difference
Two cars pass safely	4.1	5.5	34%
Car and bus or HGV occasionally pass	4.8	6.0	25%
Two HGV or busses	5.5	6.6	20%

**Table1:** Comparison of MfS and HS2 guidance on rural road width requirements

- 3.5 The assertion made at paragraph 3.19 that cars would be able to pass HGVs in most locations is made with reference to the MfS data and is clearly wrong. The village survey revealed that many people experienced minor accidents such as broken wing mirrors due to the inadequate road width and erosion of adjacent verges would not have occurred if the pavement was of adequate width. Such incidents can be costly and distressing, but are not required to be reported as accidents. Mr Rand also states that Dorset's journey time analysis in their microsimulation modelling supports the claim that the roads are wide enough to allow cars to pass HGV's, but this is simply not the case. I understand that the modelling was carried out to their client's specification and did not include any of the links with inadequate width or pinch points.
- 3.6 At paragraph 3.20 Mr Rand asserts that the widening in any one location would be minor. This assertion is made when considering widening to the recommendations in the MfS; however, if the widening were to be carried out to the appropriate standard it certainly could not be properly described as minor. The widening would also have to be carried out over much longer sections of road. More passing places would need to be provided and existing ad hoc passing places would need to be widened. This is likely to require the purchase of land from the owners of adjacent property. These correct identification of these major road modifications should not be left to detail design post granting of planning permission as Mr Rand suggests. The widening would not be a simple matter of laying additional tarmac, but would require considerable additional work such as installation of or strengthening of the substrate. This all has significant cost implications and must be evaluated at the application stage.
- 3.7 Finally, I note that in the introduction to the HS2 Rural Roads section it comments on the character of these roads. It states: Rural roads, and in particular low-speed rural roads, are often highly valued by local communities. Many rural roads have evolved over several hundreds of years and its design and visual characteristics (such as alignment, cross-section and visibility) reflect a time before the modern use of the motor vehicle. Terms such as 'quaint', 'scenic', 'enclosed', 'charming' and 'inviting' are often used to describe them, which differs from the 'traditional' highway engineering focus of capacity and engineering standards. Widening and straightening of the rural roads serving Alderholt would destroy rural nature of the Alderholt and its surrounding area.

## 4 STATEMENT OF TRUTH

I confirm that I have made clear which facts and matters referred to in this proof of evidence are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represents my true and complete personal opinions on the matters to which they refer.