

A Planning Appeal by
SMITHSONHILL LIMITED

In respect of
**A Park for AgriTech,
Hinxton**

Further Rebuttal Proof of Evidence of Rupert Lyons

June 2019

The Planning Inspectorate's Appeal Reference: **APP/W0530/W/18/3210008**

The Local Planning Authority's Application Reference: **S/4099/17/OL**



DOCUMENT SIGNATURE AND REVIEW SHEET**Project Details**

Project Title:	A Park for AgriTech, Hinxton		
Project No.:	1803-72	Report No.:	1803-72/RPOE/02
Client:	SmithsonHill Limited		

	Prepared By:	Checked By:	Approved for issue
Name	Rupert Lyons		
Signature	<i>RTBL</i>		
Date	25 June 2019		

Document Review

Revision	Date	Description	Checked By

Issued by:

Bristol
Cambridge
London
Manchester
Oxford
Welwyn Garden City

Transport Planning Associates
25 Southampton Buildings
London
WC2A 1AL

020 3709 9405
london@tpa.uk.com
www.tpa.uk.com

CONTENTS	PAGE
1 INTRODUCTION	1
2 THE STATEMENT OF RUPERT KIRBY	2
3 THE REPRESENTATION OF AUREOLE WRAGG OF PAMPISFORD PARISH COUNCIL	6
4 THE REPRESENTATION OF SIAN WOMBWELL OF ICKLETON PARISH COUNCIL	7
5 THE RESPONSE BY TONY ORGEE	9

1 INTRODUCTION

1.1 My name is Rupert Lyons and my further rebuttal evidence to this Public Inquiry is concerned with the representations that I read and heard on Tuesday, 18 June 2019 in connection with SmithsonHill's appeal against the refusal of South Cambridgeshire District Council's (hereinafter the "District Council") to grant outline planning permission for a proposed development of an AgriTech Park and ancillary works (including a new vehicular access and off-site highway works, including pedestrian and cycle links with bridge crossings over the A1301, the A505 and the River Cam (hereinafter the "appeal proposal") on land to the east of the A1301 and south of the A505 near Hinxton, and west of the A1301 and north of the A505 near Whittlesford in South Cambridgeshire (hereinafter the "appeal site").

1.2 In addition to the suite of documents, drawings and other information that formed the planning application, this further rebuttal evidence should be read in conjunction with my *Proof of Evidence* [APP/7.1], my *Supplementary and Rebuttal Proof of Evidence* [APP/7.4], the core documents that I refer to herein and:-

- the *Statement of Rupert Kirby, Hinxton Resident*, dated 18 June 2019 [ID.26];
- the representation of Aureole Wragg, Chairman of Pampisford Parish Council, entitled *Pamisford Comments*, dated 18 June 2019 [ID.29];
- the representation of Sian Wombwell, Chairman of Ickleton Parish Council, entitled *Statement to Planning Inspector John Woolcock* [ID.30]; and
- the *Response by Tony Orgee*, dated 29 May 2019 [ID.31].

2 THE STATEMENT OF RUPERT KIRBY

2.1 In his further written representation [ID.26], Mr Kirby focuses on the following three issues.

First Issue – The baseline data does not reflect the reality of the existing traffic conditions

2.2 Mr Kirby refers to the *observed queues* provided in Table 10.7 in TPA's TN04 [CD 12.4] and suggests that they "*are gross underestimates of the actual situation*"¹ because they do not reflect data provided by Hinxton Parish Council in January of 2018².

2.3 As I said in paragraph 4.11 of my Supplementary and Rebuttal Proof of Evidence, the acceptability of the traffic surveys that formed the basis of the analysis provided in the Transport Assessment [CD 2.4.10], and in TPA's TN01 [CD 12.3] and TN04 had not, to the best of my knowledge, been questioned prior to my consideration of the transport matters arising from the appeal proposal, nor has the appropriateness of the use of that data ever been questioned during my, or TPA's, engagement with Cambridgeshire County Council and Highways England. I did not have cause to challenge that because the use of data collected on a single day is common practice in transport assessment methodology.

2.4 The data presented in in Mr Kirby's Figures 1 and 2 mixes times of day and, even more confusingly, the approaches to the McDonald's Roundabout (mainly the northern and southern (on the A1301) but some western (on the A505) during the evening peak period. For that reason, it is difficult to interpret.

2.5 It is not clear how this data has been collected but it appears to comprise random events at different times on different days and, again, as I commented previously³, the data appears to show corresponding queuing time and queuing length data in Figure 1 but not in Figure 2 – some of the queuing times and lengths appear to correlate but others do not.

2.6 I recall Mr Kirby telling the Inquiry that the queue length and delay data provided in his representation dated 14 May 2019 [CD 4.1]⁴ was collected by his wife or son counting cars as the they travelled in the opposite direction (i.e. southbound on the A1301 away from the McDonald's Roundabout). That statement is inconsistent with the note in the waiting time column in the table which only relates to one entry. I remain unconvinced that it is possible to judge the number of cars in a stationary queue of traffic that your vehicle is part of. I am

¹ §1.4 (page 2)

² Provided in Figure 1 (page 3)

³ *Supplementary and Rebuttal Proof of Evidence of Rupert Lyons* [APP/7.4], §4.12 (page 6)

⁴ On page 3

not clear, therefore, how the corresponding queuing time and queue length data presented in Figure and 2 has been collected.

- 2.7 I have interpreted the horizontal red lines on Mr Kirby's figures (certainly insofar as they represent vehicular queues) as representing the AM and PM Peak Hour queues recorded in Table 10.7 of TN04, but it is not correct to correlate random events on different days with the maximum queue length on a single day.
- 2.8 I also note that the 160 vehicle queue (and corresponding 20 minute delay rising to 30 minutes, 17 minutes later) recorded on the A1301 southern approach to the McDonald's Roundabout at 08:25 on Wednesday, 16 January 2019⁵, and the 40 vehicle queues (and corresponding 10 minutes, falling to 8 minutes delay) recorded on the same approach to the junction at 16:19 and 17:45 on the same day coincided with a fatal accident on the M11 between junctions 8 (Stansted) and 7 (Harlow) that had resulted in the closure of the motorway at 05:30. The motorway did not fully re-open until 15:20⁶.
- 2.9 I have not been able to ascertain whether other spikes in the Hinxton Parish Council's data that Mr Kirby refers to relate to other exceptional events, but it does question the credibility of the inclusion of such data in representations to this inquiry. In my experience, any data collection exercises undertaken on days when exceptional events occur (including the presence of roadworks) tend to be abandoned because they cannot be considered to be representative of typical conditions.
- 2.10 To base an analysis on such untypical data or to seek to undermine the appellant's analysis on the basis that its baseline position does not correlate to an inflated average is not, in my view, fair, reasonable or credible. By its very nature the randomness of the data referred to and presented by Mr Kirby appears selective.
- 2.11 Finally, I note that Mr Kirby said that he had not made representations on the analysis provided in evidence or in the core documents because he considered the data upon which they are based to be unrepresentative. It is worthwhile making the point that increasing the level of the baseline data would result in an increase in the corresponding forecast base flows employed in the baseline analyses provided in my evidence and in the core document. That would inevitably show the existing highway network to be under even greater stress and would typically result in a greater benefit arising from the proposed off-site highway works.

⁵ See Figure 2 (on page 4)

⁶ <https://www.cambridge-news.co.uk/news/local-news/live-m11-road-closures-crash-15684314>

2.12 I also consider it worthwhile to remind the inquiry that the forecast with development traffic flows employed in the Business as Usual analyses assume that 79% of trips to and from the appeal proposal will be undertaken as single person occupancy car trips rather than the 50% in the Target mode share scenario. The proposed off-site highway works are based on the higher value so a significant margin for error has, effectively, been built into the preliminary design of those works.

Second Issue – The aim to limit commuting by car to 50% of staff is over-ambitious considering the location

2.13 Mr Kirby acknowledges that “*the location of the Wellcome Trust site is clearly comparable [to the appeal site]*” yet he believes that the Target mode share scenario “*to be hugely optimistic in a rural location such as Hinxton*”⁷.

2.14 The simple point is that the appellant has committed to achieving the Target mode share scenario and will be entering into a planning obligation to develop and implement a Framework Travel Plan that seeks to achieve it. There will be a Monitoring Plan that will demonstrate (to the satisfaction of the County Council) that those mode share targets are being achieved or that will suggest any further interventions that may be required to be implemented in order to achieve those targets.

2.15 Once implemented the Framework Travel Plan should be considered to be a living document, one that adapts to its own success and reacts to changes in the local transport environment.

2.16 I recognise the Travel Plan that Wellcome has implemented the Genome Campus as an exemplar – it has won awards. I understand that the initiatives employed there include:-

- “■ **Promotion of railcard information and travel discounts to all staff.**
- **Regular postcode surveys conducted to help us understand how far those working on Campus are commuting.**
- **Car share awareness days held for all staff.**
- **A number of Cycle to Work events are held every year to help raise awareness amongst staff.**

⁷ §2.1 (on page 7)

- ***Dr Bike is occasionally invited to Campus to help staff with any bike maintenance issues.***
- ***A celebration every June called Bike Week comprising many different events.***
- ***Additional electric car charging points have been installed bringing up the current total to 12.***
- ***We operate 10 return bus routes every weekday with a total seat capacity of 1,108. Buses are free to all staff.***
- ***We will continue to reduce single occupancy vehicles arriving on Campus aiming to meet our target of 40% by 2020.***⁸

2.17 It must be remembered that it is the car driver mode share that is the subject of the *Target* mode share scenario for the appeal proposal. The co-ordination of car-sharing by people employed at the appeal proposal will form an important element of the *Framework Travel Plan* and I note how successful it has been at the Wellcome Genome Campus in already helping to reduce “*single occupancy vehicles from 70% to less than 50%*”⁹.

2.18 I note also that Wellcome is aiming to achieve a target of 40% for single person occupancy trips to its Genome Campus.

Third Issue – The restricted car parking ratio of 1 space for 2 employees will not be commercially viable

2.19 Mr Sadler has already commented on this in his evidence.

2.20 I would, however, like to make the point that the provision of 0.5 car parking spaces per employee (up to a maximum of 2,000 spaces) is, in my view, central to the implementation of the sustainable transport strategy for the appeal proposal and the achievement of the *Target* mode share scenario.

2.21 I would also like to reassure the Inquiry that the issue of *fly-parking* to which Mr Kirby refers will be addressed by the *Monitoring Plan*. That plan will also identify further interventions that could be implemented (subject to the approval of the County Council) in the event that inappropriate off-site parking by employees at the appeal proposal takes place.

⁸ <https://www.wellcomegenomecampus.org/careers/campuslife/greentravel/>

⁹ *ditto*

3 THE REPRESENTATION OF AUREOLE WRAGG OF PAMPISFORD PARISH COUNCIL

- 3.1 In her representation [ID.29], Mrs Wragg refers to existing westbound traffic congestion on the A505 between the A11 and the McDonald's Roundabout; the propensity for existing traffic to rat run through Pampisford, particularly during peak periods, the safety of traffic turning right out of Beech Lane and Town Lane; and she expresses her view that none of the proposed off-site highway works will alleviate those phenomena because of the additional traffic that will be attracted to the appeal proposal.
- 3.2 My evidence to this Inquiry acknowledges that the existing westbound approach will be over-capacity in both the AM and PM peak hours in the *do nothing* (2030 Future Baseline) scenario. Table 6.3 in my *Proof of Evidence* [APP7.2] (on page 41) shows that it records the highest values for ratio of flow to capacity (hereinafter "RFC") of any approach of 1.14 and 1.37 (in the AM and PM peak hours respectively) with associated queuing of 126 and 316 vehicles (respectively) and delay of 5' 29" and 11' 28" per vehicle (respectively).
- 3.3 That table also demonstrates that the proposed highway works to improve the McDonald's Roundabout more than accommodate the traffic attracted to the appeal proposal in the *Business as Usual* scenario reducing the RFCs to 0.95 and 0.97 (respectively). The associated queuing reduces to 24 and 23 vehicles (respectively) and the delay to 54" and 57" per vehicle (respectively).
- 3.4 In Table 6.4 in my *Proof of Evidence* (on page 42) it can be seen that the beneficial impact of those works improves further in the *Target* mode share scenario.
- 3.5 It is not correct, therefore, to say that the proposed off-site highway works will not "*alleviate the situation because of the increased vehicle movements*" associated with the appeal proposal. To the contrary, those works will result in less queuing and delay for drivers on the westbound approach to the McDonald's Roundabout and reduced journey times for drivers overall such that I would expect the propensity for *rat running* will be reduced.

4 THE REPRESENTATION OF SIAN WOMBWELL OF ICKLETON PARISH COUNCIL

4.1 In her representation [ID.30], Mrs Wombwell is concerned with the rat running of vehicles displaced from the primary road network and she says that the appellant “*has made no attempt to study this rat running, and to estimate how many more vehicles will be displaced from the A roads by the mitigation measures they propose*”. She also makes the point that, in Ickleton Parish Council’s view, “*the traffic studies carried out fail to reflect the reality of the congestion of the local road network as experienced by residents*”. She says that “*the assertion that the wholly inadequate mitigation measures proposed by the Applicant will reduce rat running through the villages is patronising*”.

4.2 The Transport Assessment [CD 2.4.10] did in fact touch on the subject of rat running¹⁰ and in TN04 [CD 12.4], TPA concluded that:

“We believe that this [rat-running through the villages] would be highly unlikely to occur as the alternative routes are characterised by very narrow roads, one lane wide in many instances, passing bays, on-street parking, a ford over the river Cam and a railway level crossing”¹¹.

4.3 In addition, I also note from the most recent application submitted by Wellcome Trust confirms, in the *Transport Assessment* [CD 11.5] that accompanies it, and that “*current evidence is that there is little rat running on local roads connecting Duxford and Ickleton by Existing Campus staff*”¹². On the basis of the geographical proximity of the Wellcome Genome Campus and the appeal site, I consider that it is reasonable to conclude that the same would apply to the appeal proposal.

4.4 Further, the comparison of the route based delays between the 2030 Business as Usual scenario and the 2030 Future Baseline that I provide in Table 6.15 in my Proof of Evidence (on page 56) demonstrates the reductions in delay that will accrue to traffic on the A505 and the A1301. It is that analysis that forms the basis for assertion that the proposed off-site highway works will result in a reduction in *rat running* because, in my view, displaced traffic is likely to return to the primary route network. They will certainly not exacerbate the phenomena.

¹⁰ On page 82

¹¹ §14.2 (on page 49)

¹² On page 9

- 4.5 It should be noted also that the *Monitoring Plan* will identify the extent of *rat running* through the villages of Hinxton, Ickleton and Duxford. If *rat running* is detected, then the *Monitoring Plan* will identify a series of interventions that could be deployed to encourage drivers to remain on the primary route network. Such interventions could include for the alteration or expansion of the existing traffic calming measures to further slow traffic in order to reduce the attractiveness of the routes to through traffic.

5 THE RESPONSE BY TONY ORGEE

- 5.1 In his response [ID.31] to the Further Addendum to the Environmental Statement, Mr Orgee refers to the additional traffic modelling and the revisions to the proposed off-site highway works required to mitigate the traffic impact of the appeal proposal. In this respect he makes two principle points that I address below:

First Point – The proposed new mitigation measures are all concerned with junctions and fail to address the issue of what happens between junctions.

- 5.2 Mr Orgee is concerned that the proposed highway works relate to the junctions (nodes) rather than the length of roads (links) between them. He refers to the existing Hunts Road Roundabout and notes that some of the traffic in the offside lane on the eastbound approach to the junction (that is marked for right turners into Hunts Road) remains travelling on the A505 and merges with traffic in the nearside lane. He considers that this merge gives rise to congestion and delay.
- 5.3 In my judgement, the layout of the existing Hunts Road Roundabout complies with the relevant standards provided in the *Design Manual for Roads and Bridges* (hereinafter the “DMRB”) [CD 10.1]. It should be noted that for most roundabout types, the DMRB suggests that “*the exit width should, where possible, accommodate one more traffic lane than is present on the link downstream*”¹³ and that the additional width “*should be reduced in such a way as to avoid exiting vehicles encroaching onto the opposing lane at the end of the splitter island. Normally the width would reduce at a taper of 1:15 to 1:20*”¹⁴.
- 5.4 Table 6.9 in my Proof of Evidence (on page 49) shows that the eastbound approach to the Hunts Road Roundabout records the highest values for RFC of any approach in the AM and PM peak hours in the 2030 Future Baseline scenario respectively and that is likely to exacerbate the existing poor lane discipline observed by Mr Orgee on the eastbound approach to the junction.
- 5.5 The proposed replacement of the Hunts Road Roundabout with a traffic signal controlled junction will provide a formal two lane straight ahead approach on the eastbound approach (in addition to making provision for a separately signalled right turning lane). The very

¹³ *Design Manual for Roads and Bridges*, Volume 6, *Road Geometry*, Section 2, *Junctions*, Part 3, TD 16/07, *Geometric Design of Roundabouts*, Chapter 7, *Geometric Design*, §7.61 (under the sub-heading *Exit Widths*) (on page 7/15)

¹⁴ *Ibid*, §7.63 (on page 7/15)

platooning of traffic as a result of the operation of the traffic signals will allow time for downstream traffic to merge adequately before the next platoon of traffic is released.

- 5.6 My Table 6.9 demonstrates the effectiveness of the proposed works and the reductions in vehicle queuing and delay that will result from them. Further, Table 6.7 in my Proof of Evidence (on page 46) shows that the proposed traffic signal control of the Moorfield Road junction results in a maximum queue of the A505 during the AM peak hour of 50pcu (approximately 300m¹⁵). On the basis that the proposed Hunts Road and Moorfield Road junctions are in excess of 1km apart, I do not envisage that the downstream merge on the eastbound A505 will adversely affect the operation of the junction, as Mr Orgee has observed it doing now.
- 5.7 Mr Orgee expresses his concern with the downstream merges on the A505 shown in the proposed improvement of the McDonald's Roundabout junction of the A1301 with the A505 is illustrated indicatively in TPA's *Proposed Mitigation at Junction 7: A505/A1301 Roundabout* drawing (number 1803-72/PL04, revision B, May 2019) [**Appendix RL-J**].
- 5.8 He suggests that those merges could give rise to the phenomena that he has observed at the existing Hunts Road Roundabout. I can confirm that the design of the proposed improvement of the junction in respect of the downstream merges complies with the requirements of the DMRB.
- Second Point – There is little or no consideration of traffic movements at the entrance to the proposed development.*
- 5.9 Firstly, Table 2.3 in TN01 [**CD 10.23**] (on page 8) indicates that PM peak hour departures from the appeal proposal will be 915 (not the 1,056 that Mr Orgee asserts). This is in the *Business as Usual* scenario that assumes a car driver mode share of 79% not the 50% in the *Target* mode share scenario.
- 5.10 Secondly, the results of the capacity assessment that I provide in Table 6.1 in my Proof of Evidence (on page 39) demonstrate that the proposed new primary site access roundabout junction with the A1301 is illustrated indicatively in TPA's *Proposed Site Access (Junction 11)* drawing (number 1803-72/PL05, revision B, August 2018) [**Appendix RL-I**] will operate satisfactorily. I would add that that analysis is based on the ODTAB profile within the computer

¹⁵ Based on 6.0m per pcu

modelling program that hypothesises a *peak within the peak hour* that represents an unrealistic *worst case* scenario, in my view.

- 5.11 Mr Orgee is concerned that if traffic accessing the appeal proposal were to **“back up on the A1301 northwards as far as the A505 / A1301 roundabout then this congestion would have a serious impact on the functioning of this roundabout”**. Noting that my Table 6.1 predicts a maximum queue on the A1301 southbound approach to the junction of four vehicles (in the *Business as Usual* scenario), it is reasonable to assume that any such queuing would not be related to the inherent operational characteristics of the junction itself.
- 5.12 Noting also that the appeal seeks the grant of outline planning permission for the appeal proposal with all matters (including means of access) reserved, I envisage that a future reserved matters application that sought to implement the form of gated and security controlled access provided at Granta Park would need to be accompanied by an analysis that demonstrated that the characteristics of the form of entry management measure proposed would not have an adverse effect on the operation of the junction.