



Land East of Knowle Lane, Cranleigh

**Rebuttal Highways & Transport Evidence on  
behalf of Gleeson Land**

of

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# REBUTTAL

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## 1.0 Introduction

### Qualifications and Experience

- 1.1 I hold a First Class Bachelor of Engineering Degree in Civil Engineering and a Royal Society for the Prevention of Accidents (RoSPA) accreditation in advanced road safety engineering. I am a chartered member of the Chartered Institution of Highways and Transportation and a member of the Institute of Logistics and Transport. I have over 30 years' experience in the field of transportation planning, traffic engineering and highway safety.
- 1.2 I have extensive experience of highways and transport planning within the residential sector and currently act for many of the major land promoters and housebuilders operating in south-east England. In addition, I have extensive experience of major development proposals within the retail, leisure and commercial sectors.
- 1.3 My experience includes a period in the Development Studies Department of Wootton Jeffreys Consultants. Subsequently, I worked for Mayer Brown for over 14 years. I was jointly responsible for setting up Motion Consultants Limited in August 2004.
- 1.4 Motion specialises in advising developers and professionals in the development field on all matters concerning transportation, highways, traffic and road safety and our clients comprise a wide variety of private and public-sector organisations.

### Scope of Rebuttal Evidence

- 1.5 This Rebuttal Proof of Evidence (PoE) is prepared in response to the Knowle Lane Residents Group (the Residents Group) Rule 6 Party PoE prepared by Edmund Forrester, dated October 2023 ([CD1/6d](#)). The response to the Rule 6 Party evidence is set out in section 2.
- 1.6 This document is not intended to respond to every point raised by Mr Forrester, but instead focus on those points I consider will assist the Inspector at this stage insofar as it relates to matters that I consider to be incorrect or misleading, or where further commentary or supporting information is considered to be appropriate. I reserve the right to comment on those points not addressed in this Rebuttal during the Inquiry.

## 2.0 Rebuttal to Knowle Lane Residents Group Evidence

### Summary of Mr Forrester's Evidence

- 2.1 The Knowle Lane Residents Group (the Residents Group) has submitted evidence to the Inquiry, as a Rule 6 Party. The evidence prepared by Mr Forrester on behalf of the Residents Group considers nine main points under the issue of 'Highways and Transportation'. This Rebuttal responds to a number of items raised in respect of the Resident Group highways and transportation evidence.
- 2.2 The main points raised in Mr Forrester's evidence addressed in this section can be summarised as:
- ▶ Visibility to and from the south of the proposed site access.
  - ▶ Provision of traffic calming to the south of the proposed site access.
  - ▶ Reference to 'flawed' data.
  - ▶ Late disclosure of CD2/5d and the Rule 6 Party reserving the right to raise further points in this respect.
  - ▶ Accident data for Knowle Lane.
  - ▶ Suitability of Manual for Streets for Knowle Lane.
  - ▶ Application of suitable growth rates for junction modelling.
- 2.3 I deal with each of these points in turn in the remainder of this section.

### Rebuttal Points to Mr Forrester's Evidence

#### Visibility to and from the south of the proposed site access

- 2.4 The Rule 6 Party PoE (**CD1/6d**) states on page 9 (under 'T01: New Junction and associated hazards'):
- "We believe that the problems of site access have been materially understated by the Appellant and that the proposed, new junction would introduce a new hazard to Knowle Lane."*
- 2.5 Mr Forrester's evidence goes on to state that,
- "Our particular concern in respect of the new junction is to the south."*
- And, in the fourth paragraph on page 10:
- "Furthermore, traffic would slow down here (and possibly stop) not just to turn right into the development but also to give way to or otherwise accommodate traffic emerging from the development and heading north (towards the village)."*
- 2.6 APP-T2 of the Rule 6 Party PoE (**CD1/6eiv**) 'oncoming traffic summary' at point 12 states:
- "With restricted forward visibility, it is probable that some motorists will not see queuing traffic in time to stop..."*
- 2.7 The Transport Assessment (**CD2/1d**) and my PoE (**CD1/5j**) address provision of suitable visibility splays at the proposed site access (paragraphs 4.4 and 2.3/2.4 respectively). Paragraph 4.4 of the Transport Assessment (**CD2/1d**) further references Drawing 2010010-09 (within Appendix F of the Transport Assessment), which shows that there is suitable forward visibility for a driver approaching the access from the south to see a vehicle waiting to turn right into the proposed access.

### **Provision of traffic calming to the south of the proposed site access**

- 2.8 Reference is made in a number of places under the 'Highways and Transportation' evidence in relation to provision of traffic calming on Knowle Lane to the south of the proposed site access. For example, T07 and T08 of the Resident Group PoE (CD1/6d), on page 7 state:

*"The traffic-calming scheme proposed to the south of the site has not yet been designed - let alone modelled in respect of its impact upon congestion or highway safety."*

And,

*"It is highly improbable that the traffic-calming scheme proposed to the south of the site could be implemented to provide an effective solution given the physical restrictions at this location (high banks, tight bends and brow of a hill)."*

- 2.9 For clarification, no traffic calming is proposed to the south of the site access on Knowle Lane. Indeed, the last (twelfth) paragraph on page 8 of the Rule 6 PoE questions why traffic calming is located to the north of the junction, as opposed to the south.

### **Reference to 'flawed' data**

- 2.10 Reference is made to 'flawed' speed survey data (understood to relate to the 'ATC' – automatic traffic count- data) being provided in the Resident Group's PoE (CD1/6d) in the third paragraph on page 8, under 'general discussion'. The next paragraph (the fourth paragraph) claims, that as a consequence *"the Appellant had grossly understated the visibility splay required for the new junction..."*. Reference is also made to 'corrected data' in the seventh paragraph on page 8.

- 2.11 The visibility splay calculations were based on speed survey data obtained in June 2021. This data was unfortunately not appended to the original Transport Assessment (CD2/1d). However, once I become aware of this omission, the data was appended to the response to the Bellamy Roberts report dated 9th May 2023 (CD2/5d).

- 2.12 For the avoidance of doubt, neither the speed survey data, nor the calculation upon which the visibility splays were based, are flawed or incorrect; the wrong data set was appended to the submitted Transport Assessment (CD2/1d). Indeed, the Officer's Report (CD1/6d) states:

*"The applicant's response prepared by Motion (dated 9th May 2023) confirmed that the correct speed survey data had been provided, which confirmed that the SSD calculations set out in the submitted Transport Assessment were correct..."*

- 2.13 As outlined in the response to the Bellamy Roberts report dated 9th May 2023 (CD2/5d) and my PoE (CD1/5j), the ATC data relied upon by Bellamy Roberts, appended to the submitted Transport Assessment (CD2/1d), was obtained to the north of the proposed site access. Therefore, that data would only be appropriate for calculating the northern visibility splay and not suitable for calculating the SSD for the southern visibility splay as had been carried out by Bellamy Roberts.

### **Late disclosure of CD2/5d and the Rule 6 Party reserving the right to raise further points in this respect**

- 2.14 In respect of CD2/5d (the Motion response to Bellamy Roberts report dated 9th May 2023), the ninth paragraph on page 8 of Mr Forrester's evidence (CD1/6d) states:

*"The (very) late disclosure of this document has severely impacted upon our case because the expert witness we contracted had understandably based their evidence very heavily on the previous (and now corrected) data. When faced with the new information (and extremely limited time remaining to the deadline for submission of evidence) they decided to disengage from the matter – giving notice of this decision to us at 1754h on 23 Oct 2023."*

- 2.15 The Rule 6 party then request the right to raise points subsequently in respect of this Core Document.

- 2.16 As outlined above, **CD2/5d** is dated 9th May 2023 and was submitted to the Council on 17<sup>th</sup> May 2023. The document is referenced in the Officer's Report (**CD4/1b**) on page 14 (fifth paragraph under 'Highways and Parking'), which demonstrates that the document had been received by the Borough Council. The response to Bellamy Roberts (**CD2.5d**) forms a large aspect of my PoE (**CD1/5j**).

**Accident data for Knowle Lane**

- 2.17 The first few paragraphs on page 9 (**CD1/6d**), under the title 'T01: New Junction and associated hazards' makes a number of references to accidents on Knowle Lane. APP0T1 to Mr Forrester's PoE (**CD1/6e/iii**) provides an annotated extract from the crashmap website, identifying incidents on Knowle Lane covering a 23 year period. The incidents on Knowle Lane in proximity to the Site are identified to range in date between December 2000 and October 2013.

- 2.18 Paragraph 015 Reference ID: 42-015-20140306 of the National Planning Practice Guidance (**CD6/2b**), under 'What information should be included in Transport Assessments and Statements?' states:

*"... 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;"*

- 2.19 Paragraph 2.8 of my PoE (**CD1/5j**) refers to personal injury accident data for the most recent 5-year period for which data is available (ending 31st July 2023), and states:

*"The study area included approximately a 1.5 kilometre section of Knowle Lane south from the junction with the High Street. Two incidents were recorded on this section of Knowle Lane during the defined period, both classified as 'slight' in severity. One of the incidents on Knowle Lane occurred approximately 430 metres to the north of the proposed site access, at the junction with Snoxhall Fields. It is noted this incident occurred in dry/daylight conditions. The incident involved a car and a pedal cycle whereby a vehicle attempted to overtake a cyclist turning right into Snoxhall Fields. The likely causation factors reference the car failing to judge the pedal cycle speed/path and being 'careless/reckless/in a hurry'. The second incident recorded on Knowle Lane took place a short distance to the north of the proposed site access. This incident took place in daylight and wet/damp conditions and involved a single car travelling northbound losing control, with a slippery road cited as the likely causation factor. On the basis of the PIA information received, it is not considered there are any existing issues with Knowle Lane that result in any road safety concerns. Notwithstanding this, the proposed development will deliver a scheme of traffic calming on the section of Knowle Lane to the north of the site access, which will contribute to reducing vehicle speeds on this section on the road."*

- 2.20 The Resident Group PoE (**CD1/6d**) then also outlines that the crashmap data only includes incidents reported to the police and where an injury is involved. There is no way of checking non-injury related incidents that are not reported to the police.

**Suitability of Manual for Streets for Knowle Lane**

- 2.21 On page 10 of the Rule 6 Party's PoE (**CD1/6d**), it is stated:

*"We intend to assess the suitability of MfS in respect of such a location and further explore this issue."*

- 2.22 As outlined in paragraph 2.6 of my PoE (**CD1/5j**),

*"Manual for Streets 2 (CD7/5b) (paragraph 1.3.2) identifies that, "... most MfS advice can be applied to a highway regardless of speed limit. It is therefore recommended that as a starting point for any scheme affecting non-trunk roads, designers should start with MfS". It is accepted that the recorded 85th percentile southbound speed (41.4 mph) marginally exceeds this 40 mph threshold. However, the approach adopted is consistent with guidance in MfS on the basis that this is recommended."*

- 2.23 Knowle Lane is subject to a 40 miles per hour (mph) speed limit at the location of the proposed site access, which reduces to 30mph on the approach to Cranleigh village centre.

- 2.24 The stopping sight distances (SSDs) set out in the Design Manual for Roads and Bridges (DMRB), which sets out design guidance relating to trunk roads and motorways, are based on different driver perception-reaction time and deceleration rates to those applied in Manual for Streets, which would not be appropriate for a road such as Knowle Lane.

**Application of suitable growth rates for junction modelling**

- 2.25 The first paragraph on page 11 of the Rule 6 Party’s PoE (CD1/6d), under ‘T02: congestion at junctions of Knowle Lane and Cranleigh High Street’ states:

*“We believe that the Appellant’s traffic-generation modelling is flawed and consequently, that conclusions based upon it in respect of congestion-modelling, trip generation and sustainability are unreliable.”*

- 2.26 As identified in paragraph 2.14 of my PoE (CD1/5j), for clarification, no conclusions are drawn from the modelling on trip generation or sustainability.

- 2.27 In terms of congestion modelling, Mr Forrester’s evidence goes on to state:

*“We will query the growth-figures used to project future flows because we consider that they might not take account of the very significant housing developments in progress to the south of the site.”*

- 2.28 No evidence is presented in the Rule 6’s PoE to support its concern, although APP-T6 – Projected Traffic Growth (TEMPro) (CD1/6evii) was submitted on 27<sup>th</sup> October to the Planning Inspectorate. I assume this document relates to this matter, although there is no accompanying commentary. Reference is made in the PoE on page 10 to traffic calming on Knowle Lane to, “...significant traffic-growth in future that would arise from developments south of Cranleigh (most notably, Dunsfold Park)”. The following paragraphs therefore consider the suitability of growth rates applied in the Transport Assessment (CD2/1d) for junction modelling, and the impact of Dunsfold Park.

**Growth Rate Forecasting**

- 2.29 The growth forecasts set out in the Transport Assessment (CD2/1d) were produced from the National Trip End Model (NTEM) through the Trip End Model Presentation Programme (TEMPro). TEMPro is published by the Department for Transport (DfT) in order to provide long range, comprehensive forecasts of personal travel demand for people living in households across Great Britain. This is a standard approach used across the industry and recommended by the DfT. The forecasts in the Transport Assessment (CD2/1d) were produced using the RTF (Road Traffic Forecasts) 2018 Scenario 1 dataset, considered to be the ‘best guess’ available at time of release.

- 2.30 A new version of TEMPro is now available (version 8.1), which supersedes the version used to inform the Transport Assessment (CD2/1d). The table below contains a comparison of growth rates produced using both. It can be seen that TEMPro v8.1 produces slightly higher growth rates over the same period than used in the Transport Assessment (CD2/1d). However, the effect is in the order of 1.2-1.3% and unlikely to result in a material impact on junction performance. Indeed, daily fluctuations in traffic are likely to significantly exceed this level.

Time Period	Weekday Morning Growth Factor	Weekday Evening Growth Factor
2022 – 2028 (v7.2 RTF 2018)	1.0313	1.0314
2022 – 2028 (v8.1 Core)	1.0449	1.0434

Table 2.1: TEMPro 8.1 Growth Factors Comparison

- 2.31 Given the relatively small change in growth forecast resulting from use of the latest version of TEMPro available. It is considered that the growth rates presented in the Transport Assessment (CD2/1d) remain an appropriate basis for assessment. It should be noted that Surrey County Council as local Highway Authority raised no objection to the use of these growth rates as part of the consultation process.

- 2.32 Alternative growth forecasts, also using TEMPro v8.1, have been produced on behalf of the Rule 6 party. These growth rates are predicated on elevated levels of housing delivery in the local area (Census Middle Super Output Areas (MSOAs) Waverley 013 and 015). An extract from the gov.uk FAQs page is also included, noting that TEMPro does not explicitly assume that particular development will or will not be delivered. This submission is based on a number of misunderstandings and departures from best practice, as set out below.

*Use of 'Regional' Scenario*

- 2.33 TEMPro v8.1 allows users to select a number of different scenarios to reflect different levels of economic growth, decarbonisation and other effects. It is standard practice to use the 'Core' scenario, described in the release notes as follows:

*"In purely Trip End terms, the Core is our best guess about the future."*

- 2.34 The Regional scenario used by the Resident's Group is predicated on depressed levels of growth in London and the Southeast, with corresponding elevated growth in other regions. Assuming no manual adjustments are made, this scenario is likely to underestimate housing and job growth when compared to the recommended Core scenario and Local Plan housing forecasts. Presentation of these forecasts as evidence that Local Plan growth and allocated sites are not adequately accounted for in TEMPro cannot be relied upon. Use of this scenario without reasonable justification is a departure from best practice and will likely lead to unreliable results when compared to the v7.2 forecasts used in the TA or the v8.1 Core scenario forecasts outlined above.

*Inclusion of Developments*

- 2.35 While the NTEM does not include specific developments explicitly, allocated sites are included. Housing delivery forecasts are based on local plans and local plan monitoring reports. Any growth associated with the local plan, such as allocated sites, is therefore included in the growth forecasts. This growth is forecast at the local authority level and distributed across the various MSOAs, rather than apportioned to any specific site or location.
- 2.36 While it may allow for a more accurate forecast of trip growth with origins or destinations in the chosen MSOA, explicit inclusion of allocated sites through adjustments to the housing forecasts in TEMPro is likely to result in double counting and therefore artificially elevated rates. This is because these dwellings will already be allocated to surrounding MSOAs and trips arising in these areas will route via the modelled area.

*Housing Delivery Forecast Adjustments*

- 2.37 It is noted in the Rule 6's evidence that additional housing growth will arise from developments located south of Cranleigh, principally Dunsfold Park. Notwithstanding the fact that Dunsfold Park is an allocated site and accounted for as set out above, the Residents Group has adjusted the housing forecasts upwards for both MSOAs for which growth rates are presented.
- 2.38 These forecasts result in an additional 1,279 dwellings across the area, or 213 dwellings per year. No evidence is presented to demonstrate why this assumption is reasonable. Dunsfold Park for instance, is not anticipated to deliver any dwellings prior to 2025 and just 374 up to 2028, based on Waverley's Five Year Housing Land Supply Statement (April 2023). It is unclear which other developments are included to make up the remaining 905 dwellings adjusted for, or whether any of these sites are included via the NTEM approach to local plan growth.



*Growth Rate Summary*

- 2.39 Based on the above, it is concluded that the growth rates used in the Transport Assessment (**CD2/1d**) remain reasonable and appropriate. While it is accepted that the release of a newer version of TEMPro leads to slightly increased growth forecasts, the difference is not considered to be material and falls within normal daily fluctuations in traffic levels.
- 2.40 The alternative analysis presented on behalf of the Rule 6 party appears to contain a number of misunderstandings and departures from best practice and therefore cannot be relied upon. In particular, large adjustments have been made to housing growth forecasts with little evidence that this is appropriate. Nor has the any consideration been given to the way in which the NTEM accounts for local plan growth, including allocated sites.