HighgateTransportation

Land at Peel Hall, Warrington
Reopened Inquiry

Rebuttal Proof of Evidence
on Highway and Transportation Matters

Part B - Following Submission of Mike Taylor's Evidence

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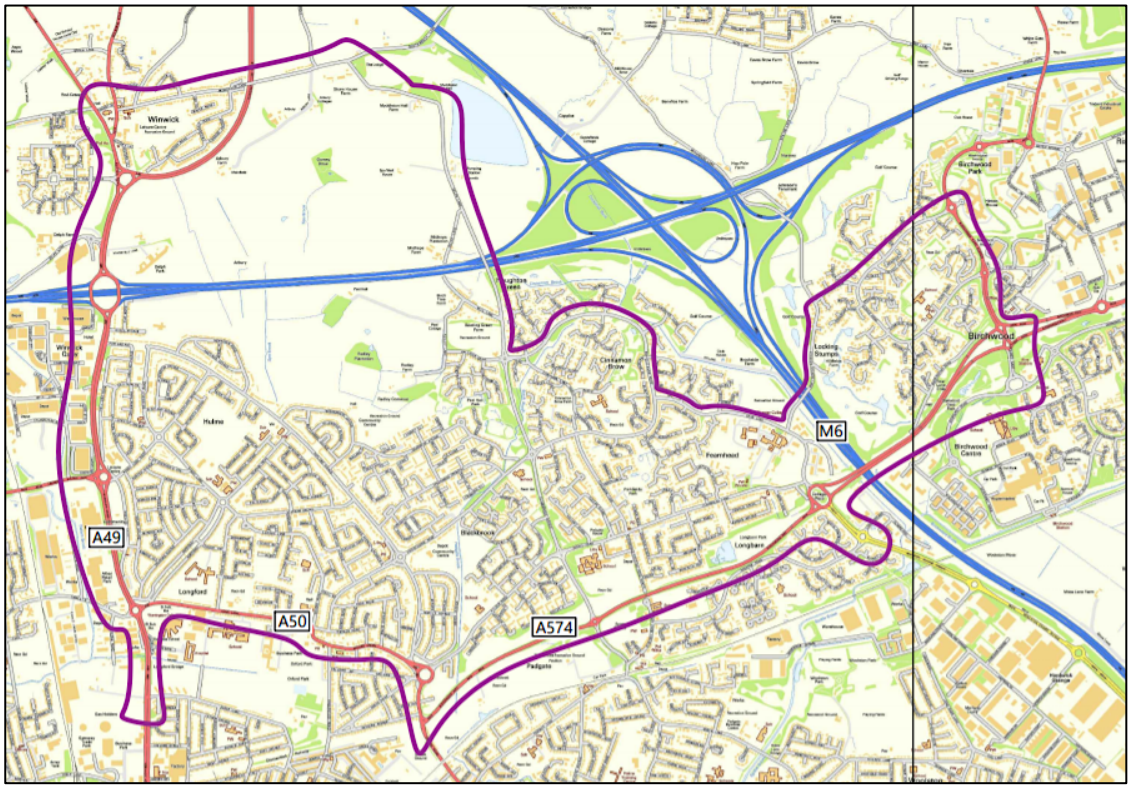
Rebuttal Proof of Evidence on Highway and Transport Matters Following Submission of Mike Taylor's Evidence on behalf of the Council

1.0 Introduction

1.1 My name is David Tighe, I am a Director of Highgate Transportation and my qualifications and experience are set out in my main proof of evidence.

1.2 This rebuttal proof of evidence has been prepared following the receipt of Mike Taylor's (MT) proof of evidence and is in response to his paragraphs 5.18 to 5.25, which provides a summary of accident records in the whole Borough and the entire Peel Hall study area. The Peel Hall study area is shown in **Figure 1.1**.

Figure 1.1 – Peel Hall Study Area



1.3 From **Figure 1.1** it can be seen that the Peel Hall study area includes major road corridors such as A49 to the north and south of the M62 including M62 junction 9; the Winwick Link Road; A50 between A49 and A574; A574 between the A50 and Birchwood; and not just the small number of roads that make up the residential area to the south of the appeal site.

1.4 MT uses his interpretation of the records in an attempt to predict future accident rates in the residential area to the immediate south of the appeal site and to show that the appeal proposals will result in an unacceptable impact on highway safety in this area.

1.5 My general overview of MT's paragraph's 5.18 to 5.25 is that he is trying to demonstrate the highway safety impact of development traffic on the area to the immediate south of the appeal site using data from across wide and diverse areas. Firstly, MT is relying on the whole Borough and secondly, he is relying on the entire Peel Hall study area, neither of which are representative of the residential area to the south.

1.6 In his analysis MT takes no account of the increase in background traffic through the area to the immediate south of the appeal site due to rat-running traffic that will occur in any event.

1.7 My response to MT's paragraphs 5.18 to 5.25 is set out in **Section 2.0**.

1.8 MT's proof of evidence paragraphs 2.6 and 2.7 refers to the VISSIM work that is being carried out in respect of the A49 corridor. This notes that work was ongoing at the time the main proofs of evidence were submitted. At the time of writing this rebuttal proof (26th August 2020) the VISSIM work has been completed and is with the Council to confirm their acceptance. This confirmation is still awaited.

2.0 MT's Paragraphs 5.18 to 5.25

2.1 In his paragraph 5.18, MT refers to the summary in the TAA which concludes that there is no pattern to the accidents and that there are no underlying road layout deficiencies in the study area. This section of MTs evidence provides a comparison between the TAA 5 year data (to 30th September 2019) with whole Borough 5 year data (to 31st December 2019).

2.2 In his paragraph 5.19, MT states that his review of the accident data indicates a high proportion of vulnerable road user accidents in the overall Peel Hall study area, "particularly" in the residential area to the south.

2.3 MT's paragraph 5.20 refers to his Appendix E that provides a summary of collisions including those involving pedestrians and cyclists, which he considers provides the basis for a comparison between the area to the south, the Peel Hall study area and the whole Borough.

2.4 However, what MT is comparing is two different types of study areas one of which is a dense residential area surrounded typically by major road corridors and the other is the entire Borough which contains a range of land uses such as the main retail centre, various employment areas and the less dense area of South Warrington. Therefore, the evidence base that MT has used to apply to the residential area to the immediate south of the appeal site is too diverse to be appropriate.

2.5 MT's Appendix E includes a summary section on the Sandy Lane West, Poplars Avenue, Capesthorne Road corridor for the 5 year period to the end of May 2020 and compares this to the A50 corridor between the A49 and Hilden Road. This shows:

i. Sandy Lane West/Poplars Avenue/Capesthorne Road corridor;
   - Total number of casualties 29 (25 slight and 4 serious)
   - 10 of which involved pedestrians or cyclists 1 of which was under 16

ii. A50 corridor between the A49 and Hilden Road:
   - Total number of casualties 43 (37 slight and 6 serious)
   - 14 of which involved pedestrians or cyclists 4 of which was under 16

2.6 It should be noted that the Sandy Lane West/Poplars Avenue/Capesthorne Road corridor, with 29 casualties, is around 3.0km in length, whereas the A50 corridor between the A49 and Hilden Road, with 43 casualties, is half the length at around 1.6km. At around 35 casualties per kilometre for the A50 corridor between the A49 and Hilden Road and at around 10 casualties per kilometre for the Sandy Lane West/Poplars Avenue/Capesthorne Road corridor.

2.7 In his paragraph 5.21, MT states that the Peel Hall study area has a "*higher number*" of pedestrian and cyclist casualties (121/30.4%) than the Borough as a whole (725/24.4%) and that the "*number*" of pedestrian and cyclist casualties aged under 16 years (38/9.5%) is significantly higher than the Borough as a whole (171/5.7%). (My underlining.) MT's table from paragraph 5.21 of his evidence is replicated below for ease of reference.

	Study Area 5 years	**Whole Borough 5 years**
Total number of casualties	398	2984
Total number of pedestrians and cyclist casualties	121	725
Pedestrian and cyclist casualties as a percentage of all casualties	**30.4%** (24.6% higher than whole Borough at 24.4%)	**24.4%**
Total number of pedestrian and cyclist casualties aged under 16	38	171
Under 16 Pedestrian and cyclist casualties as a percentage of all casualties	**9.5%** (66.6% higher than whole Borough at 5.7%)	**5.7%**

2.8 It should be noted that it is not the 'number' of casualties that MT is referring to in his text but the proportion that occurred in the study area and in the whole Borough.

2.9 In his paragraphs 5.22 and 5.23, MT suggests that at current traffic volumes the proportion of pedestrian and cycle casualties within the Peel Hall study area is 24.6% higher than the whole Borough figure; and that the proportion of under 16 pedestrian and cyclist casualties is 66.6% higher, despite the extensive traffic management and calming in place throughout.

2.10 It should be noted that, as recognised by the Department for Transport (Reported Road Casualties Great Britain: 2018 Annual Report), under 16s are disproportionately represented in pedestrian casualty data as this, along with being a car passenger, is their predominant form of travel (see extract contained at **Appendix DT/R1**).

2.11 The way that this information is presented is misleading as the difference in actual proportions of pedestrian and cycle casualties between the Peel Hall study area and the whole Borough are small. This is because the proportion of pedestrian and cycle casualties in the entire Peel Hall study area is 30.4% (121 casualties of 398), which is representative of the densely populated Peel Hall study area and range of interlinking road types that encourages rat-running through the area to the immediate south of the Peel Hall site, compared to pedestrian and cycle casualties the whole Borough at 24.4% (725 of 2984).

2.12 Furthermore, the entire Peel Hall study area is not subject to extensive traffic management and calming. It is only a relatively small number of streets within the study area such as Greenwood Crescent, Poplars Avenue, Capesthorne Road, Cleveland Road and Cotswold Road that have such measures, with some others being subject to a 20mph speed restriction.

2.13 In paragraph 5.24, MT states that given the statistics for the Peel Hall study area, the increase in development traffic within the residential area to the south will raise safety concerns.

2.14 It should be noted that MT appears to be relying on accident data from the whole Peel Hall study area (including the A-road corridors along its boundary) to demonstrate an impact on the specific residential area, with a relatively small number of streets, to the immediate south of the appeal site.

2.15 MT suggests in paragraph 5.25 that the pedestrian and cyclist casualty data combined with the peak hour and AADT traffic flow increases as a result of development traffic in the area to the south represents an unacceptable impact on highway safety.

2.16 It should also be noted that, as set out in paragraphs 11.2 to 11.38 of my proof of evidence, the level of background traffic i.e. without development traffic, anticipated through the area to the immediate south of the appeal site (the Sandy Lane West, Poplars Avenue, Capesthorne Road corridor) will increase as a result of rat-running traffic trying to avoid the A-road corridors which are constrained at peak times. This will lead to an increase in vehicles through this area in any event.

2.17 Therefore, in my view MTs approach is flawed because what MT is comparing is two different types of study areas one of which is a dense residential area surrounded typically by A-road corridors and the other is the entire Borough, which contains a wide range of land uses and then applying it to the small number of streets that form the residential area to the immediate south of the appeal site. Therefore, the evidence base that MT has used to apply to the residential area to the immediate south of the appeal site is too diverse to be appropriate.

2.18 Given this, I disagree with MT's conclusion that the appeal proposals will result in an unacceptable impact on highway safety in the area to the immediate south of the appeal site.

Appendix DT/R1

DfT Extract – Reported Road Casualties Great Britain: 2018

Department for Transport

Reported Road Casualties Great Britain: 2018

Annual Report

Moving Britain Ahead

September 2019

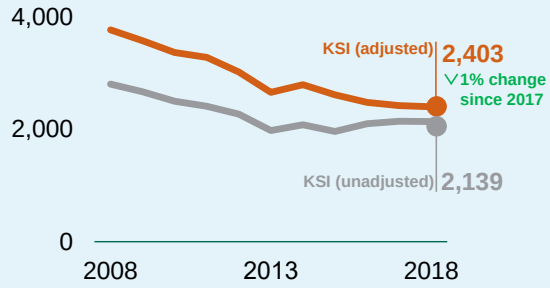
Children (aged 15 or under)

There were 48 **child** deaths in 2018, same as in 2017. Child fatalities have fluctuated between 48 and 69 over 2010 to 2018 with no clear trend. Overall child casualties decreased by 9% between 2017 and 2018 to 14,266 casualties in 2018 which is the lowest year on record.

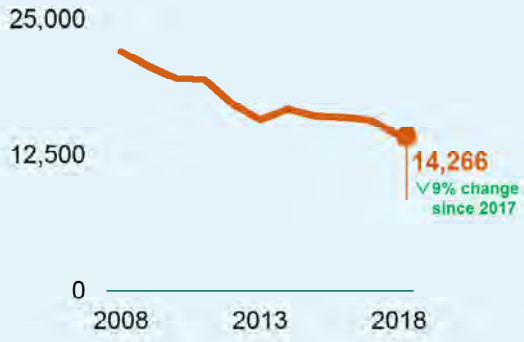
As has been the case historically, child fatalities are mainly **pedestrian** (28 fatalities in 2018) and **car passenger** (15 fatalities). This is because these are the forms of transport most commonly used by children.

Fatalities

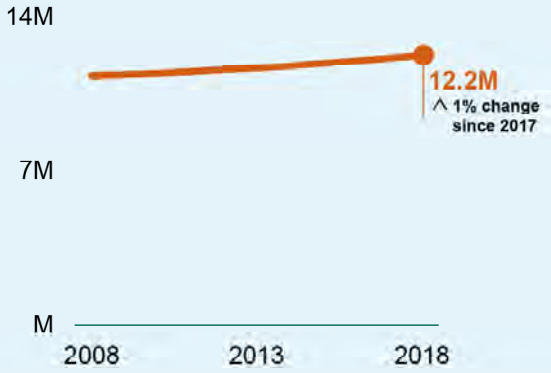
Killed or seriously injured



Total casualties



Population
(millions)



These trends are observed despite the population of children aged 0-15 in Great Britain increasing by 8% since 2008.

The population of different age groups in Great Britain is from the Office of National Statistics population figures: https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp?opt=3&theme=&subgrp