

NATTRAN/SE/S247/6126

TVBC/PB/2

PLANNING PERMISSION REF: 25/01047/FULLN

TEST VALLEY BOROUGH COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

SECTION 247

PROPOSED STOPPING UP OF HIGHWAY AT WESTERN AVENUE, ANDOVER, HAMPSHIRE

OS GRID REFERENCE [436202, 145700 – 436283, 145515]

REBUTTAL PROOF OF EVIDENCE

ON BEHALF OF THE APPLICANT

HIGHWAYS AND TRANSPORTATION

PHIL BRADY

DIRECTOR

STANTEC UK LIMITED

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1. INTRODUCTION

- 1.1. My name is Phil Brady. The details of my qualifications and experience are included in my main proof of evidence dated 9 June 2026.
- 1.2. In this rebuttal proof of evidence, the defined terms in my proof of evidence apply unless specified otherwise.
- 1.3. This rebuttal proof of evidence is prepared on behalf of the Council and produced in support of an application under section 247 of the TCPA 1990 to stop up highway in the Borough of Test Valley in relation to planning permission reference 25/01047/FULLN.
- 1.4. Reference to CD/[x] are to documents in the Core Documents.

Declaration

- 1.5. The evidence which I have prepared and provided in this rebuttal proof of evidence is true to the best of my knowledge and belief and is in accordance with the CIHT Professional Standards and Conduct Policy. I confirm that the opinions expressed are my true and professional opinions.

2. SCOPE OF EVIDENCE

- 2.1. This rebuttal proof of evidence should be read in conjunction with my proof of evidence dated 9 June 2026 (CD/11.01), along with the Statement of Case dated 29 May 2026 (CD/9.01) and the proofs of evidence of David Jowsey (Local Highway Authority) (CD/11.22), Ross Rawlings (Road Safety) (CD/11.06), Tim Rose (Air Quality and Noise) (CD/11.21) and Fay Smiles (Planning) (CD/11.24) dated 9 June 2026 and the rebuttals proofs of evidence of Fay Smiles (Planning) dated 16 June 2026 and Ross Rawlings (Road Safety) dated 16 June 2026.
- 2.2. The purpose of my rebuttal proof of evidence is to respond to additional issues raised by the objectors to the SUO Application in proofs of evidence received. My rebuttal proof of evidence is not intended to be an exhaustive response on all matters and deals only with certain points where it is considered appropriate or helpful to respond in writing at this stage. Where a specific point has not been dealt with, this does not mean that these points are accepted, and they may be addressed further at the Inquiry.

3. ALTERNATIVE STOPPING UP PLAN(S)

- 3.1. The additional statement submitted by Bob Briggs on 3 June 2026 (CD/10.09) includes a map showing an alternative proposal for the stopping up order.
- 3.2. A very similar alternative proposal has been put forward by Adrian Truss as well in his proof of evidence submitted on 7 June 2026 (CD/12.01).
- 3.3. I have reviewed the designs provided ("Alternative Proposal"), and I am of the opinion that as the Alternative Proposal is not to scale and as such it is not possible to assess its compliance with the relevant design guidance (HCC Technical Guidance Note (TG) 1 and 10 and The Design Manual for Roads and Bridges (DMRB)). However for the reasons discussed below, I consider this Alternative Proposal cannot be implemented within required design standards and would not provide the benefits previously defined within my and the other proofs of evidence submitted on behalf of the Council.
 - 3.3.1. The slip lane proposal for the West Street and Western Avenue junction removes the proposed all moves signal junction between Western Avenue and West Street and replaces the junction with a slip road from the southbound carriageway of Western Avenue. This arrangement removes the ability for northbound traffic on Western Avenue to turn right into West Street and therefore would be required to perform a U-turn at Folly's Roundabout to access the southbound carriageway and then West Street.

- 3.3.2. The proposed extension of West Street to connect to Waterloo Court would need to be designed to the appropriate carriageway width, appropriate footway widths and include sufficient visibility at the junction with Waterloo Court within available land. This also needs to consider the gradient of the embankments to the river and ensure there is sufficient separation between the proposed park and the West Street extension, all of which would require land take, impacts the viability of the Alternative Proposal, and would likely reduce the proposed park area in favour of road space.
- 3.3.3. The proposed roundabout would need to be classified as a “normal roundabout” due to the level of traffic flow on Western Avenue combined with the speed limit. It is uncertain whether the appropriate diameter for the proposed roundabout could be accommodated within the spatial constraints of the location. Further the roundabout would need to meet the required flared approaches, deflections and visibilities in accordance with DMRB CD 116 – ‘Geometric design of roundabouts’ and also provide sufficient capacity to accommodate the forecast traffic patterns and it is unclear whether the Alternative Proposal is able to do so.
- 3.3.4. The new West Street link to Waterloo Court, would force all West Street traffic to exit via Waterloo Court and place additional capacity issues on the new roundabout and retain the use of the section of West Street in front of Chantry Lodge to all day traffic through movements. These all day through traffic movements would be removed as part of the Council’s proposals, as per paragraph 7.9.4 in CD/11.01 (Evidence of Phil Brady – Transport).
- 3.4. Given the nature of the Alternative Proposal, at this stage it cannot be assessed in terms of compliance with regard to the aforementioned design standards or safety parameters and how, if the standards were enforced, it would influence the ability to provide the Alternative Proposal within the land limits to which the current Development complies.
- 3.5. The Alternate Proposal has not been subject to any junction analysis to determine if the proposed junctions or layout would provide sufficient or comparable capacity to the current layout proposed in support of the order which has been subject to full assessment using the Department For Transport approved junction modelling tools.
- 3.6. In order to validate a proposal to redevelop part of the Highway, any proposal would first need to be subject to a minimum of a scaled geometrical layout plan to demonstrate that it can be designed in accordance with the required standards. It would then be subject to a transport assessment (such as the Transport Assessment carried out by Stantec for the Development) which would include strategic and localised modelling and a minimum of a Stage 1 Road Safety Assessment, before the proposal could be assessed in any detail. The Development has been assessed in accordance with all these requirements, which led to the Highway Authority supporting the Development through the planning process.

Adrian Truss proposal

- 3.7. In addition to the Alternative Proposal, Adrian Truss has submitted his own alternate proposal in his evidence submitted on 7 June 2026 (CD/12.01). Although not as defined as Bob Briggs, we believe that it follows the same basic assumption, retaining West Street one way as per its current configuration, but with a traffic lane on Western Ave maintained parallel to the bus station and connecting West Street with Waterloo Court. Therefore, I consider that my response to the Alternative Proposal also applies to the alternate proposal submitted by Adrian Truss.

4. EVIDENCE OF ADRIAN TRUSS

- 4.1. Adrian Truss submitted a proof of evidence on 7 June 2026, a supplemental proof of evidence on 8 June 2026 (CD/12.02) with an accompanying technical assessment from Charles and Associates (CD/12.04).

- 4.2. I do not propose to use this rebuttal proof of evidence to respond to all points raised by Mr Truss which have already been discussed in my main proof of evidence and the Council's Statement of Case.
- 4.3. However, I would like to respond to the point made in paragraph 7.3.3 which states that if a vehicle was to proceed beyond Portland Grove, there is no opportunity for it to turn round lawfully unless it performs a three-point turn in two-way traffic.
- 4.4. I am of the opinion that this would be very unlikely as the appropriate signage would seek to control this risk. However if it were to happen, there are various options including vehicles turning around in the entrance to Lidl or entering into the Lidl car park, circulating the car park and then exiting on to West St..

5. TECHNICAL NOTE OF CHARLES AND ASSOCIATES

- 5.1. The technical assessment of Charles and Associates ("C&A Report") was prepared in June 2026 and submitted with the supplementary evidence of Adrian Truss.

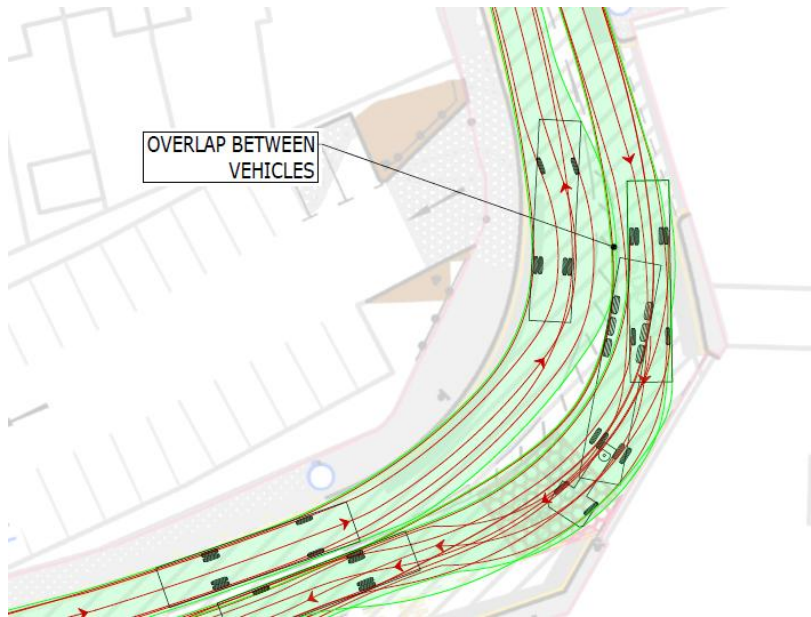
Active Travel Provision

- 5.2. Section 2 of the C&A Report covers active travel provision. The C&A Report states four main concerns relating to:
 - 5.2.1. Reduced Footway Provision – this is covered in paragraph 7.9.1 in CD/11.01 (Evidence of Phil Brady – Transport).
 - 5.2.2. Legible routing.
 - 5.2.3. Vulnerable Users – this is covered in paragraph 5.5 of CD/11.02 (Evidence of Ross Rawlings – Road Safety).
 - 5.2.4. Dedicated cycle provision.
- 5.3. The C&A Report states that the Development lacks legible routing for pedestrians on West Street due to the need to cross the road on several occasions. The Development does not propose the removal of any of the crossings or footways that are currently provided on West Street and therefore the Development does not have an impact on the legibility of pedestrian routes.
- 5.4. The C&A Report also states that the Development removes the existing advisory cycle lane on West Street outside Chantry Lodge and does not provide any replacement dedicated provision for cycling. Although the Development does remove the short section of cycle lane on West Street, the shared footway/cycleway that runs along the frontage of the Leisure Centre would continue to be a shared footway/cycleway as part of the Development.
- 5.5. It should be noted that the assessments in the C&A Report are limited to the Development layout on West Street only and do not address the wider Development as a whole. When looking at the Development as a whole, the shared footway/cycleway on West Street would link to the proposed cycleway facilities along Western Avenue via the two proposed crossings, connecting to the bus station (and beyond) via a traffic free route.
- 5.6. While it is acknowledged that that the proposed cycle route is an alternative to the existing cycle route, for those currently using the existing advisory cycle lane on West Street the Development does not prevent them from following the same route, however cyclists would be mixed with vehicular traffic between Chantry Lodge and the bus station. In other locations such as Western Avenue, the Development's proposed layout will separate cyclists from vehicular traffic and provide a more attractive and safer route for short and longer journeys.

Vehicular Movements

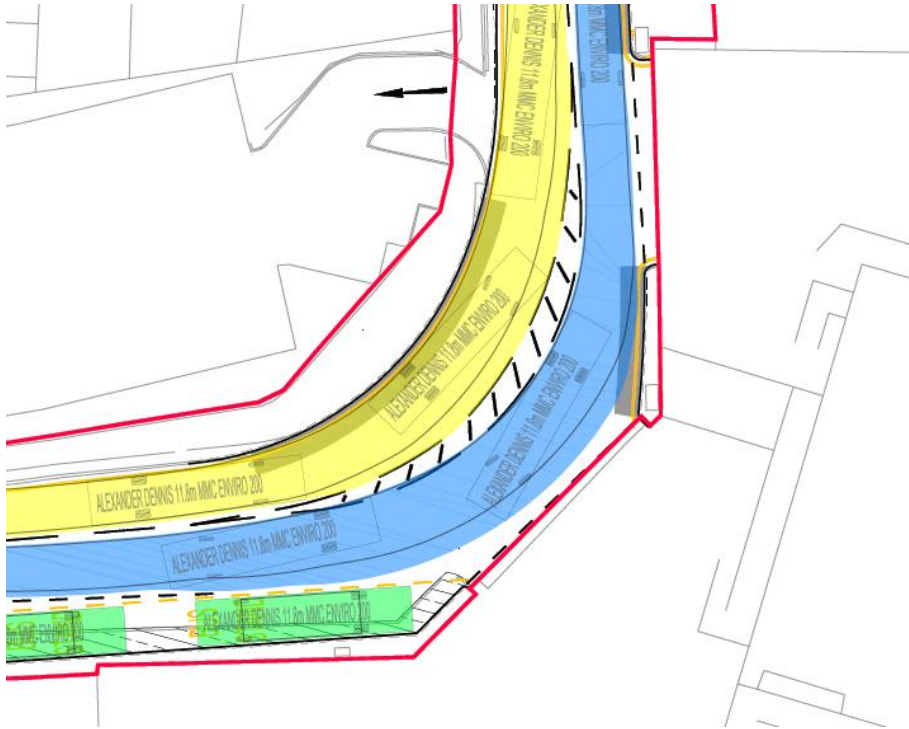
- 5.7. The C&A Report raises concerns over two vehicle movements arising from the Development layout on West Street:
- A bus and HGV opposing one another on the bend outside of the Waitrose servicing area
 - HGV 'Left-out' manoeuvre from Lidl
- 5.8. Drawing 26-081-001 was provided as part of the C&A Report which shows the swept path of a standard 11.8m bus northbound and a 16.5m articulated lorry southbound. The drawing shows a conflict point between the two vehicles at the bend of West Street adjacent to the servicing yard behind Waitrose. A snip of this drawing is shown in Figure 1 below.

Figure 1: Bus and HGV movement conflict



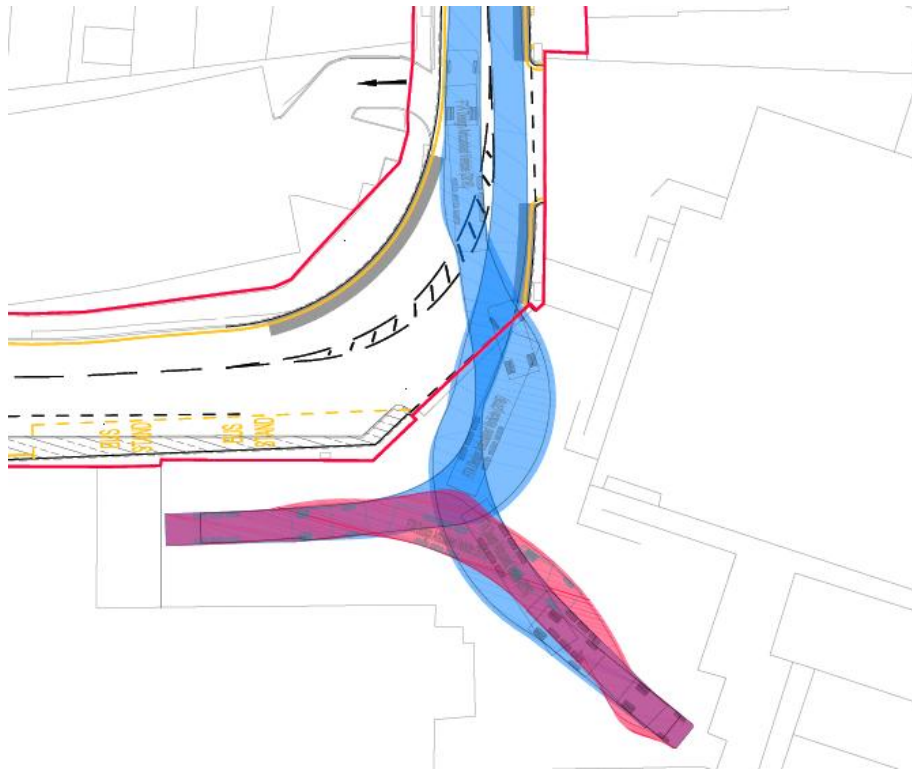
- 5.9. I am of the opinion that the swept path analysis of the northbound bus is not a true reflection of the movement as the northbound bus is able to undertake a tighter turn than what is shown in the C&A report. The swept path analysis undertaken by Hampshire Engineering Services and submitted with the application for the Development (CD/5.1.16) (Drawing CJ009625-HEH-HGN-40012558-DR-CH-1000) shows that the northbound bus does not encroach onto the proposed hatching. A snip of (CD/5.1.16) is shown in Figure 2 below.

Figure 2: Northbound bus swept path analysis (CD/5.1.16)



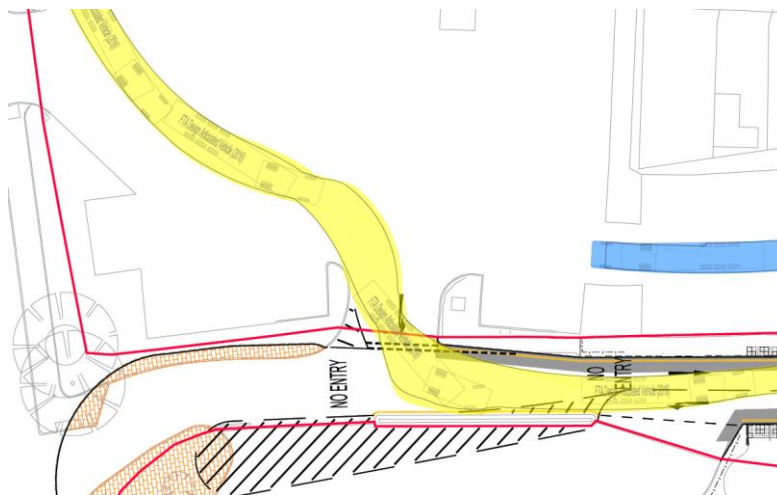
- 5.10. With the Development in place, HGV's are only required to go as far as the service yard to access Waitrose which is before the corner shown in Figure 1 and Figure 2 above. I am also of the opinion that an articulated vehicle travelling southbound beyond this point would only occur in error and therefore would be extremely infrequent.
- 5.11. (CD/5.1.16) shows that, when moving southbound, the articulated vehicle does not encroach onto the proposed central white line hatching when undertaking the correct movement into the delivery area behind Waitrose. A further snip from (CD/5.1.16) is shown in Figure 3 below. As neither the northbound bus movement, nor the correct southbound HGV movement encroach on the hatching, there would be no operational issues with these movements.
- 5.12. It should also be noted that the manoeuvre would be undertaken by a professional HGV driver who will exercise increased caution when undertaking tighter movements.

Figure 3: Southbound HGV swept path analysis



- 5.13. It was also highlighted at paragraph 3.1.5 of the C&A Report that the 'left-out' manoeuvre from the Lidl supermarket required by the Development was extremely tight for HGVs and could not easily be replicated. The swept path analysis in (CD/5.1.16) shows that the movement can be safely undertaken, and this was agreed with the highway authority. The relevant snip from (CD/5.1.16) that demonstrates this movement is shown in Figure 4 below.

Figure 4: HGV Lidl exit manoeuvre (CD/5.1.16)



- 5.14. It should also be noted that the manoeuvre would be undertaken by a professional HGV driver who will exercise increased caution when undertaking tighter movements.

6. EVIDENCE OF ANN TRUSS

- 6.1. Within the evidence provided by Ann Truss (CD/12.05), there are a number of people crossing surveys predominantly linked to those crossing West Street between the Leisure Centre and the Lidl site. These have been undertaken across multiple days, however there is no information suggesting the time of day these have been undertaken. The methodology used was to observe

10 or 30-minute periods and then factor the results up for the hour. This is not a standardised methodology as it takes no account of the demand profile across the hour or the peaks and troughs in demand linked to the adjacent land uses the routes support. As set out in paragraphs 5.5 to 5.7 of (CD/11.06) (Evidence of Ross Rawlings – Road Safety) and paragraphs 8.22 to 8.23 of (CD/11.01) (Evidence of Phil Brady – Transport) the crossing types and locations comply with the relevant design standards and have not been raised in terms of a safety issue within the Council’s evidence.


- 6.2. It was also noted in the evidence of Ann Truss that there were concerns regarding college students wearing headphones and using their mobile phones while crossing. As discussed above, no issues of safety have been raised in respect of pedestrian crossings, however this is an existing risk and to some extent students/other road users are responsible for their own safety and limiting distractions while passing through public realm areas or crossing roads.

7. PROOF OF EVIDENCE - CLARIFICATION

- 7.1. Paragraph 8.33 of my proof of evidence states that *‘On the occasion where the school bus arrives when another bus is already at the stop, the bus would temporarily stop in the left lane of the carriageway until the bus stop becomes available. As the carriageway is two lanes, traffic behind the school bus would be able to overtake the bus in the right lane or wait briefly for the bus to move into the bus stop’*.
- 7.2. This refers to a concern relating to the school bus arriving while a bus is already at the proposed drop off location causing congestion on Western Avenue. The drop off location would be the existing bus stop on the southbound carriageway of Western Avenue. The bus stop is located adjacent to where the bus lane is proposed, this is shown in (CD 5.1.14) (CJ009625-HEH-HGN-40012558-DR-CH-0010 – GA Overview & Sheet Layout).
- 7.3. In the event that a bus is already in the bus stop, the school bus can temporarily wait in the bus lane without causing congestion.
- 7.4. The bus lane would be installed as part of this Development and therefore traffic would not be required to overtake the school bus at this point.

8. STATEMENT OF TRUTH

- 8.1. I confirm that insofar as the facts stated in this Statement are within my own knowledge I have made clear which they are and I believe them to be true, and that the opinions I have expressed represent my true and complete professional opinion.
- 8.2. I confirm that my statement includes all facts which I regard as being relevant to the opinions which I have expressed and that attention has been drawn to any matter which would affect the validity of those opinions.

Signed: 

Name: Phil Brady

Date: 16 June 2026