

### **Note on Moor Park Close traffic**

1. Mr Tucker during his evidence in chief, queried about the traffic flow arising from Moor Park Close. This is a new point not raised in Mr Tucker's proofs of evidence or during Mr Jarvis' cross-examination. It is separate to the contention that the observed flows on Meresborough Road / Moor Park Close do not correspond to the simulated flows, to which Mr Jarvis responded during his evidence in chief and during his cross examination. It is also separate to the contention that the reference case seems to show a big increase in traffic flow compared to the base model, a point raised by Mr Tucker in ID 36 paragraph 3.48.
2. According to Mr Tucker, the traffic on Moor Park Close should have been significantly less than 300, as shown in appendix B of ID34 in the 2028 reference case, since the road only links to a cul-de-sac around Moor Park Close.
3. However, this is not the case in the Medway Aimsun Model (MAM), which does not model this link as a cul-de-sac. The model flows at Moor Park Close are higher than one would expect, because the MAM has simplified the area around Moor Park Close by extending the zone to integrate additional housing from the surrounding area as shown in the figure below.



4. This additional housing is reflected in the model zone (centroid) which loads and attracts traffic from Moor Park Close. Thus the flow of 300 is not an anomaly, it is simply the result of the way in which the model was coded in this specific location.
5. This does not affect the validity of the model nor the validity of the Otterham Quay Lane/Meresborough Road/ A2 junction outputs for the following reasons:
  - a) The MAM Validation report provides values for the Meresborough Road section which is an arm of the Otterham Quay Lane / A2 / Meresborough Road Junction. This can be found in the appendices of the MAM validation report in pages 153 and 200 for the AM and PM Peak times accordingly (section ID15554). These model flows all validate against observed data for the specific arm of the junction.
  - b) Mr Tucker states in his second rebuttal, (ID36,P18), that the base MAM validation report (CD12.4) shows 8 vehicles per hour on Moor Park Close. This is incorrect. The MAM validation report (CD12.4) does not provide any comparison between observed and

modelled traffic flow values for Moor Park Close which Mr Tucker states in ID 36. Mr Tucker has not extracted the correct values from the validation report. He has reported the flow values for Meresborough Lane (from PDF page 151 of CD12.4) instead of Meresborough Road from the MAM Validation report. Meresborough lane is a small rural single carriageway link, 1.2 miles away from the location in question and has a very different traffic profile than Meresborough Road (the exact locations are presented in CD12.4, PDF page 98).

- c) The MAM values that Mr Tucker questioned during his evidence in chief, were extracted from Figures 15 and 16 in ID34 and the Flow plots provided in Appendix B of ID34. Mr Tucker has compared the MAM model flow values from the 2028 Reference case with the single day observed traffic counts that he collected in 2018. This comparison is not valid, as in addition to the issues outlined above, it also does not factor in the background traffic growth.

**Karl Jarvis**  
**27<sup>th</sup> April 2021**