

Linby Parish Council
FAO: Mrs Denise Ireland

Our Ref: CB/F19196/191120
Date: 19 November 2020

BY EMAIL ONLY

Dear Denise,

I write further to our previous meeting with Gedling Borough Council and the applicants for this scheme. I also refer to BWB's subsequent Highways Technical Note that was produced and presented within the online planning file.

Disappointingly the technical note does little to address the fundamental concerns I have regarding the application's ability to provide stakeholders with clear answers to important points of detail in respect of highway safety, link and junction capacity, and sustainable transport choices. My concerns in this regard have been clearly set out in previous submissions (see my email dated 13 July 2020) and yet again fail to be addressed. It is also noted how the Highway Authority is seemingly very quiet in its formal position with this application where no formal observations are provided within the online planning register. This is surprising as there are some key areas where the application is not being presented in line with what I recognise as standard expectations, where it would be reasonable to presume my own concerns are also shared by the officers.

Having read the report it is evident that the Local Planning Authority is being asked to conclude its position on these vital highway impact issues by reference to a Transport Assessment that I believe is flawed for the following reasons:

- The GNTM is an appropriate tool for assisting with the identification of a suitable Local Plan and its strategic cumulative infrastructure requirements. However, it covers a significant time period and should not be used to determine points of detail on specific planning applications, where updated assessments must be undertaken to assess current conditions and establish compliance with the NPPF. This model is nearly 5 years old and uses flow data that appears to have been collected prior to 2015, which is well beyond the standard shelf life for reliability.
- All assessment of highway impact relates to a 2028 Design Year, which assumes the development will be fully complete and operational within the next seven years. Despite this point being raised many times previously, no evidence has been provided to confirm that this is a realistic and deliverable proposal. Hence, to satisfy the policies set out within the National Planning Policy Framework, the applicant must be required to support its ambitious plans with clear market led evidence and

potentially even a restrictive condition, if any confidence is to be given to the conclusions offered within the Transport Assessment.

- It is acknowledged by BWB within its own Transport Assessment (reference paragraph 7.29 of the Transport Assessment) that the *"GNTM may be underplaying" the effects of the development on the B6011*, yet nothing has been done to address these serious concerns and the residents of Linby are right to expect further clarification on what are likely to be significant and potentially dangerous traffic increases through this already sensitive village location.
- Calculations presented to BWB previously (and not disputed) have demonstrated that potential traffic increases of up to 589 peak hour movements could occur along Wighay Road through Linby and Papplewick, yet the applicant continues to expect residents to accept that traffic conditions overall would reduce by up to 70 movements on Wighay Road with this major mixed use scheme in place (reference Table 1 of BWB October 2020 Technical Note). I fully understand that route displacement will take place within the strategic transport model, largely to reflect congested locations and improved alternative routes, but in this instance there is no explanation given as to where or why this will occur as justification of the proposed conditions. Taking the proposed traffic assignment details in good faith, this approach implies that circa 600 of the existing movements on Wighay Road will be displaced to surrounding routes. If this is to be accepted, the applicant must be required to provide a more comprehensive explanation rather than simply commenting how it is 'relying on the GNTM' output which they accept is flawed in its representation of this location.

Further to the above, Section 2 of the Technical Note simply provides a recap of the already established position regarding sustainable transport. It does nothing but emphasise how only a minimalist approach has been adopted for this major new development scheme where the application relies on modal shift away from single occupancy car-use within what is clearly a relatively remote location that is not well served by nearby local services. I have previously expressed concern at the way in which large parts of this scheme will not have adequate access to public transport until, at best, well into the lifetime of the development. The only response offered appears to be that of the developer contribution, which I do not consider to be in accordance with best practice as it will only have a limited value in terms of delivering ongoing services and will likely run out well in advance of the development being close to completion – leaving future residents exposed to a lack of choice for this important mode. It would be appropriate for the applicant to provide further detail in the form of a formal strategy that could be secured as part of any planning permission for ensuring minimal levels of access at each stage of development.

Whilst the offer of additional information is welcomed, in this instance and as we have regrettably experienced in past responses, it does nothing but reiterate information we already know from the documents submitted. As I see it the application is still missing vital points of information that are necessary to satisfy key requirements of the National Planning Policy Framework, particularly in respect of paragraphs 108 and 109, without which I simply do not see how there can be any approval of this scheme.



I trust that the above details are clear and in order and look forward to receiving any comments you or your colleagues may have on the points raised.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Chris Bancroft'.

Chris Bancroft

Director

Bancroft Consulting Limited

t: 0115 9602919

e: chris@bancroftconsulting.co.uk