

Linby Parish Council
FAO: Mrs Denise Ireland

Our Ref: CJB/F22023/230322
Date: 23 March 2022

BY EMAIL ONLY

Dear Denise,

**LAND AT TOP WIGHAY FARM, NEAR HUCKNALL, NOTTINGHAMSHIRE
LPA REFERENCE: FR3/4371**

I write further to our ongoing discussions in respect of the above application which has been submitted to Nottinghamshire County Council. Following receipt of comments provided by Pegasus Planning I would now offer the follow response.

The first point to note is that the submission does not make any reference to the concerns raised in my letter of 17 February 2022, a copy of which is enclosed for ease of reference. Rather, it focuses solely on the comments made by Nottinghamshire County Council, also dated 17 February 2022. It summarises these concerns in respect of the following areas:

- Access to bus service provision
- Pedestrian and cycle access
- Financial obligations towards improvements to local bus services
- Travel Plan and Travel Packs

In responding to the lack of bus service provision the applicant is essentially stating that compliant bus access would be provided following the successful delivery of a further planning application, the details of which are unknown and cannot be confirmed at this stage. Furthermore, the Local Planning Authority are not able to take this into account, as it does not form part of the planning application. The Local Planning Authority have no way of conditioning or ensuring this would happen. Despite assertions in the previous application that this scheme will be a highly sustainable development, it is evident that there are no assurances that local bus operators will even be willing to divert services into the site. As raised in my letter of 17 February 2022, it is imperative that convenient access to public transport services is delivered from day one of any occupied scheme. It is suggested by Pegasus that bus passengers would access southbound bus services from the layby at the southern edge of the proposed internal carriageway whilst the overall development is being completed. No evidence to demonstrate how buses could safely utilise this area has been provided nor has any consideration been given to the fact that the desire line between the bus stop and the building access will cross the main access road, without any designated crossing facilities. Without this much needed bus stop the nearest southbound bus stop is on Hucknall Road, more than 835 metres from the new junction and then a further distance of around 100 metres



to the building entrance via the current road layout. The walking route also takes bus users a significant distance along a 50 mph road and a narrow footway, which is not going to encourage future bus travel. In the opposite direction, whilst it is recognised that the northbound bus stop is 440 metres from the new A611 junction, access to the building would be circa 520 metres when the final part of the journey is taken into account. This exceeds the council's maximum requirements by approximately 25% and will present a further barrier to bus travel at a site that is seeking to promote high levels of sustainable travel. In reality these barriers deter people from commuting via bus, and is therefore not a viable option for travel for most users.

The submission then goes on to respond to concerns raised regarding the scheme layout design which requires pedestrians and cyclists to adopt a tortuous route through the proposed access road layout. Providing a direct access off the A611 would appear to reduce walking and cycling distances by circa 50 metres which, as explained above, could be critical in decision making between travel modes. Again, it is suggested that the problem could be addressed by another separate planning application to deliver this much needed infrastructure as part of other proposals. If this link is not achievable through design then it places further emphasis on the need to include more convenient bus stops and increased car parking to recognise the fact that this scheme has limitations and does not offer good opportunities for access by non-car modes.

The comments regarding financial obligations are noted and I shall consider any updated submission in due course, although any agreement of the final amount must reflect the severe shortcomings of this application and need for major improvements to the existing infrastructure if it is to satisfy even the bare minimum requirements.

The submission concludes with a response on Travel Plan and Travel Packs. The response ultimately concludes that whilst a condition requiring the Travel Plan would be acceptable, it is felt unreasonable that the developer should be obliged to offer two-month bus passes for staff. Not only does this stance go against the conventional approach typically applied by officers at Nottinghamshire County Council when securing planning permission for new development, it perhaps raises the question of why you would even request such an incentive when there is no convenient access to buses – at least until such time as another developer decides to put an application in for the remainder of the site. There is no planning case to deter from the standard method approach applied to other developments where this contribution is sought.

Until such time as the applicant is able to provide a detailed technical response to the issues raised above and also in my letter of 17 February 2022, I do not see how the Local Planning Authority can reasonably come to the opinion that this application fully satisfies the requirements of the NPPF, and particularly in this instance Paragraphs 110 and 111. In summary, I believe the application must be supported by further evidence to confirm the following:

- Details of an appropriate public transport access strategy that will exist from day one of the development, including drawings to demonstrate the suitability of any bus infrastructure and confirmation that the maximum walking distance between the bus stops and building entrance is no more than 400 metres. This must include a firm commitment from any bus operator that they are willing to divert existing services as required.
- Further consideration should be given to delivering a more direct pedestrian and cyclist access from the A611, which is deemed essential to reducing travel distances for non-car modes.



- Justification as to how the proposed modal split figures would in practice be achieved from the outset, given there is currently poor access to public transport services and only limited development within a comfortable walking distance. Without this, consideration should be given to revisiting the trip rates and parking provision.
- Confirmation that the proposed on-site cycle parking provision will be delivered in accordance with the requirements of LTN 1/20, with a full independent site audit and design review of the access arrangements.
- Evidence to justify why the current proposed parking strategy would satisfactorily serve the development, with further details regarding on-street parking controls for implementation within the immediate surrounding highway network to ensure overspill parking does not take place detrimental to highway safety.

I trust that the above information is satisfactory for your purposes in liaising further with the Local Planning Authority on this matter. Should there be any further issues then please do not hesitate to contact me.

Yours sincerely

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Copy of BCL letter of 17 February 2022