

Linby Parish Council

FAO: Mrs Denise Ireland

Our Ref: CJB/F19196/300420
Date: 30 April 2020

BY EMAIL ONLY

Dear Denise

TOP WIGHAY FARM PLANNING APPLICATION (LPA REF 2020/0050)

I refer to our recent instructions from the Parish Council to provide an assessment of the various transport and highways focused documents that have been submitted in support of the above application.

Following receipt of the Council's responses last week I have now had the opportunity to review the Transport Assessment, Framework Travel Plan and Road Safety Audit submissions, as contained within the online planning file for this application.

By way of an overview, the approach adopted within this review is to consider the data as presented within the context of the application file and in line with what current best practice guidance requires applicants to address in fulfilling its obligations for submitting the application. This comes from almost 30 years' experience of helping developers to deliver planning applications throughout the country including over 20 years' experience working with officers at Nottinghamshire County Council to deliver proposals for major new development schemes.

The objective of this review is to provide the residents of Linby Parish with an assessment of the proposals and their corresponding highways and transport implications, such that they can be content that a robust application has been submitted that satisfies planning obligations. These comments follow a previous application for the accompanying site access junctions where serious concerns were expressed about the layout and future operation.

Review of key documents

Before proceeding with my review of each specific document it is clear that much of the work prepared in support of this application relies on the findings of the Local Plan review process, including the Nottinghamshire Local Transport Plan 3. This is an important process that considers the strategic impact of major development opportunities throughout the region, helping to identify critical infrastructure schemes that are necessary to address locations where significant cumulative impact could occur. This is a process that takes time to prepare and, in this instance, comprises an assessment of traffic conditions that was based on data collected prior to 2016. Although this is a significant planning status, the allocation of a site within the Local Plan must not be confused with planning permission and it remains the responsibility of each applicant to demonstrate within its application how the proposals can be delivered in line with current published Government Policy Guidance set out within the National Planning Policy Framework (NPPF).

As presented within Section 2 of the Transport Assessment, in transport terms decision making should be based on Paragraphs 108 and 109 of the NPPF, which essentially requires that safe and suitable access should be achieved for all users and for there to be no severe residual cumulative impact on highway capacity or safety (see paragraph 109).

Details submitted as part of the application have a responsibility to demonstrate clearly how these requirements would be satisfied before any decision to approve it can be reached.

Transport Assessment (BWB, Revision P2, January 2020)

The Transport Assessment presented includes a high-level review of current planning policy/design guidance relevant to this site, along with a review of the existing highway infrastructure and opportunities for non-car travel. No details of current traffic flows (i.e. conditions within the last three years) are provided and a very simple review of Personal Injury Accidents has been undertaken for the immediate surrounding highway network, which notably included the B6011 through Linby. The main text confirms that 44 incidents were recorded throughout the study area during the study period and concludes that “*there are no common causal factors associated with the PIA’s recorded on the road network in the vicinity of the site*”. However, further inspection of the data provided shows how 29 of these incidents specifically occurred along the access route between the westernmost site access junction and the Griffins Head junction to the east of Linby.

The report considers how existing public transport services could be utilised by future residents of the site based on a 400 metres walking distance, as quoted from current design guidance. However, Figure 9 of the Transport Assessment clearly demonstrates how only a small proportion (less than half) of the site area would fall inside of this catchment. There is a suggestion that additional bus stops will satisfy this issue until such time as buses can be diverted into the site to reduce overall walking distances. In my experience, bus operators do not like diverting bus services into cul-de-sac developments and if the scheme is to achieve projected travel reduction targets accessibility issues must be addressed from the outset of this development. Hence, it is vital that firm commitment is set out within the Transport Assessment to delivering an appropriate public transport strategy from day one if the predicted vehicle trip rates are to be accepted and any conclusions regarding compliance with the NPPF to be acceptable.

Conclusions have also been drawn regarding acceptable walking and cycling distances to local amenities, seeking to support a case for sustainability. However, these measurements are based on separate points at each of the site access junctions, with no account of the fact that the northernmost part of the site boundary is more than 550 metres (crow-fly) distance away from the A611/Site Access roundabout. This assessment, and corresponding conclusions, is therefore overly simplistic and flawed for most of the site area.

Section 6 of the Transport Assessment outlines the ‘Assessment Methodology’ providing a text-based summary of the various strategic modelling exercises undertaken as part of 2016 Transport Assessment and Greater Nottinghamshire Transport Model (GNTM) work. It is generally recognised that data submitted in support of planning applications should be no more than 3 years old, and obviously preferably as recent as possible. No such supporting information exists or is referenced within the report and this presents a serious concern over the legitimacy of this work. Table 5 of the Transport Assessment sets out the following predicted modal split forecast for the proposed development.

Mode	%’age split	Morning Peak	Evening Peak
On-foot	5%	85	60
Bicycle	1%	18	12
Bus / tram	5%	85	60
Train	1%	18	11
Motorcycle	1%	17	12
Car driver	82%	1403	976
Passenger	5%	85	60
Total	100%	1711	1190

Important points to note from the above modal split are that the proposed development is predicted to generate up to 1403 peak hour movements within the surrounding highway

network, and that allowing for the majority of public transport and cycling trips representing some form of activity within the pedestrian infrastructure up to 206 peak hour movements could occur.

In considering the above, the Transport Assessment offers no real time assessment of where these predicted increases could occur and the appropriateness of infrastructure to absorb them. I would expect the report to provide a clear breakdown of how traffic conditions could specifically change throughout the local road network with detailed junction modelling and capacity assessments at each location where a significant change in conditions could occur. Although the NPPF advises that this should be where a 'severe' change in conditions would occur, industry best practice typically adopts a guideline of between 30 and 60 peak hour two-way movements.

Section 7 of the Transport Assessment details the applicant's highway impact assessment, which includes modelling results of the now consented A611/Site Access signal-controlled junction. Inspection of the report confirms that the modelling has only allowed for the pedestrian crossings being activated 'every other cycle'. Further clarification should be provided in respect of this approach as it is unrealistic to expect pedestrians (up to 206 in a single hour) to be able to cross the A611 or site access arm in a single cycle. Clarification on the proposed staging plan would be important to have here. The consequences of this could be to further exacerbate capacity issues at a junction that already presents major concerns in my view.

This section continues to present the results of a detailed junction modelling exercise at the Annesley Road/Wighay Road roundabout, Wighay Road/Waterloo Road roundabout, and the A611/Wood Lane roundabout. It then provides an assessment of impact issues along the B6011 and within Linby itself. This modelling exercise is welcomed but there is no justification for it being limited to these locations, given that the proposed development would generate up to 1403 peak hour traffic movements. In fact, looking at the summary results tables for each junction modelling exercise (tables 7 through to 12 of the Transport Assessment) it is evident that the 'with development' assessments in each case operate better than the base case 'without development' scenario. There is no explanation of this within the report and it must be reasonable to presume that this scale of increase would generate a material change in conditions. The applicant must explain and clarify with further detail how this situation has arisen and why it should be considered acceptable. It must also clearly present where the predicted increases would occur throughout the local road network. On this point, I note the content of paragraph 7.29 of the Transport Assessment which states:

"The GNTM modelling predicted that the Top Wighay Farm Development will result in only 80 and 113 additional vehicle trips on the B6011 through Linby and Papplewick in the morning and evening peak hours, albeit the 2016 TA did reference that GNTM may be "underplaying" the effects of the development on the B6011."

No further consideration of this matter has been given within the Transport Assessment, despite numerous concerns being raised by the Parish Council and key policy requirements, which the application claims to be addressing (such as those set out within Section 2 of the report). This point further emphasises the need for a more rigorous assessment of how traffic conditions could change within the local road network based on current traffic flow data and specific locations where material changes could occur. This should address key

local junctions that are regularly used by residents and identify where other non-vehicular users would be significantly affected.

Framework Travel Plan (BWB, Revision P1, January 2020)

In reviewing the Framework Travel Plan it is important to recognise how it is not the role of this document to address any lack of infrastructure improvements being delivered within the application. Neither is it possible to precisely predict how future travel patterns will establish themselves, particularly within the commercial element of the scheme. However, this site was allocated on the back of a significant push towards achieving a 10% target reduction in single occupancy vehicle trips.

Because of this I would expect to see a wide range of clear and confirmed measures that deliver tangible modal shift. For the reasons set out above, I believe the assessment of opportunities for walking, cycling and public trips is simplistic and inaccurate such that compliance with the minimum standards is questionable, let alone the delivery of a high quality network of opportunities for non-car travel. The targets are welcomed but to achieve a 10% reduction far more attention to detail must be provided within the delivery of infrastructure, with better permeability for pedestrians and cyclists (including crossings and links within the surrounding highway network), clear commitment to delivering bus services that are within 400 metres of each property from day one of the development, and clear contractual obligations for future tenants within the commercial non-residential. I do not believe the current list of measures and incentives largely being offered ‘for consideration’ provide enough commitment to achieve the 10% target reduction and this must be addressed as part of the application to ensure the appropriate infrastructure is provided upon occupation of any development.

Road Safety Audit Stage 2 (VIA, November 2019)

Details of the Road Safety Audit were requested as part of my submissions in respect of the recently consented site access junctions, so it is therefore disappointing that they have only been made available now. It is noted that the November 2019 Stage 2 audit follows separate Stage 1 audits carried out in July and August 2010. I am surprised to see such a lengthy gap in audits and would question whether the change in development proposals (including corresponding trip generation) has been fully accounted for within the audit process. In fact, Paragraph 2.4 recognises this concern and states how this Stage 2 Audit should be treated as a “fresh report”. However, looking at the list of drawings/documents examined as part of the Stage 2 audit I see no reference to the Transport Assessment trip generation calculations and modelling results or any swept path assessments, where the potential for side swipe collisions at the roundabout junction was a key concern raised within my earlier submissions. It would therefore appear that the current audit does not fully satisfy the requirements of DMRB GG 119 as mentioned in paragraph 1.8 of the Audit. Details of the drawings examined were not included within the pdf file setting out the Road Safety Audit so it has not been possible to comment further on the full range of problems raised.

Notwithstanding the above, three problems were raised within the Stage 2 Audit relating to different areas within the proposals. Inspection of the Road Safety Audit – Feedback Form provided confirms responses to only two of these.

- **Problem 3.1** highlights a very important concern regarding the layout of the junction A611/B6011 roundabout improvements, with clear recommendations on the subsequent reconfiguration. The Designers response (dated December 2019) refers this back to the traffic modellers to address, as rightly so the consequences of the recommendations will have a major impact on capacity at this sensitive location. However, Paragraph 7.18 of the Transport Assessment (dated 14 January 2020) simply states “*no changes have*

been made to the assessment of the proposed site access roundabout when compared to that set out in the Access Appraisal Addendum included at Appendix G. As a result, this has been designed to operate within capacity in the future 2028 assessment year.”

Hence, it would appear that the matter has been overlooked by the consultants without due consideration. This problem should have been addressed as part of the previous planning application and at very least as part of this application for the development it is intended to serve. I would also mention that there could be serious legal/liability implications of not properly addressing this issue in the event of any subsequent personal injury collisions at the junction.

- **Problem 3.2** highlights the potential for improving pedestrian crossing facilities at the northern edge of the proposed signal-controlled site access junction at the A611. The recommendations are subsequently dismissed due to a “*lack of space within the Highway boundary on the northern side of the A611*”. However, the land to the north of the A611 is clearly owned by (or at least under the control of) the applicant so it is very difficult to understand why these improvements cannot be made. Given that current planning policy requires developers to make the best use of any potential to improve pedestrian access opportunities, this matter must be addressed properly within any site layout design at this location. This was a point specifically raised within my previous submissions.
- **Problem 3.3** presents a problem relating to street lighting within the proposed signal-controlled site access junction. There is no mention of this problem within the Designers Response and it is important that the matter should be resolved appropriately, with drawings updated as necessary.

Summary

My review of the detailed technical information presented in support of this application suggests that there are many areas where further information is required before any decision can be made in respect of compliance with the NPPF and specific local policy and design guidance objectives. This includes:

- a more accurate assessment of walking and cycling distances based on the full extent of the site boundary and not the site access junctions,
- clear justification of how the proposed trip generation would impact on current traffic conditions, alongside an updated detailed assessment of highway safety and capacity issues at the proposed site access junctions and along the B6011 corridor through Linby,
- firm commitment to a strategy for delivering internal bus services from immediate occupation of any development,
- important design and modelling updates to reflect the Road Safety Audit recommendations,
- a more comprehensive approach to improving pedestrian and cyclist facilities along local desire lines to ensure trips generated by the site are not just accommodated but actively encouraged.

In considering the specific issues within Linby I would again mention how the Transport Assessment makes no recommendations for improving conditions along the B6011 corridor. This is despite up to 29 incidents being recorded along the B6011 access route and up to 113 peak hour movements being predicted as part of the GNTM which it acknowledges as being “underplayed”. The application details must provide a clear and current assessment of how traffic conditions might change in the local area and not rely upon the strategic modelling exercise which is now based on outdated flow data. In itself, 113 peak hour movements would represent a material change in conditions and, given that the development is predicted to generate 1403 total peak hour movements overall, I believe that this will significantly increase when considered properly. These increases therefore have



the potential to create a significant adverse impact on the amenity of residents within the village, making it potentially unsafe for all users.

I trust that this information is satisfactory for your purposes and look forward to hearing how matters progress with the application. If you have any queries whatsoever regarding the documents, then please do not hesitate to contact me.

Yours sincerely

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