

Linby Parish Council
FAO: Mrs Denise Ireland

Our Ref: CJB/F22023/170222
Date: 17 February 2022

BY EMAIL ONLY

Dear Denise,

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

I write further to our recent discussions in respect of the above application, which has been submitted to Nottinghamshire County Council. I have now had the opportunity to review the planning file and, in particular the Transport Statement and Framework Travel Plan documents alongside the Highway Authority's response dated 20/01/2022 and the applicants Design and Access Statement.

By way of an overview, I note that the application seeks full planning consent for the office building (circa 3418 sqm gross floor area), including means of access and parking provision. This appears to rely upon taking access via a new signal controlled T-junction at the A611 that was promoted via a separate planning application (LPA Ref: 2020/0050). As of writing this letter, I do not believe the 2020/0050 application has received full planning consent and so I would question how this recent application can be taken any further without a clear strategy on how the proposals would be accessed from the public highway network. On the subject of this previous planning application, I refer to my past comments in respect of the cumulative traffic generation and off-site impact issues within the surrounding highway network. No further details appear to have been submitted by the applicant in response to my concerns so, by virtue of the fact that this application feeds off the principle of the wider development, they remain largely relevant to this application and I have not repeated them in this letter. However, to be clear, I remain deeply concerned at the potential off-site highway impact and safety implications of the Top Wighay Farm development, which this forms a significant part of.

Given the above, I have focused my appraisal of the application on the principles of Paragraph 110 of the National Planning Policy Framework, which now states:

"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- (a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- (b) safe and suitable access to the site can be achieved for all users;*
- (c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46 ; and*

(d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."

After reviewing the proposals my key areas of concern with the application as it currently stands relate to the following areas:

- Access to sustainable transport choices including public transport and by cycle.
- Refuse collections.
- Parking provision.

Details of the proposed development trip generation have been presented within the Transport Statement and, in isolation, I have no reason to take issue with the rates used. However, as previously mentioned these rates do rely on a good level of access to sustainable transport modes in order to accurately represent the likely conditions.

Sustainable transport choices

Part 3.2 of the latest published design guidance from Nottinghamshire County Council sets out the "General Geometry of Commercial and Industrial Estates and Premises". Within Table T3.2.1 it stipulates the following requirements for bus stops.

"To include real time bus stop poles & displays including associated electrical connections, shelters, lighting and timetable cases and bus stops clearways.

300m – 400m intervals

180mm raised kerbing height for 4 m min.

Lowered kerbs for access

To include shelters, lighting, real-time displays, timetable cases, & bus stop clearways"

With regard to bus frequency the table states a requirement of *" Target every 30 minutes minimum day time services, evenings and weekends minimum hourly"*.

Section 7 of the Transport Statement states how the *" forecast public transport trips would therefore be accommodated by the existing and proposed infrastructure"*. However, Section 5 of the Transport Statement provides no explanation of any bus stop improvements and Figure 6 of the report clearly shows that the nearest services would be well outside of the Highway Authority's maximum 400 metres requirement. This is an actual walking distance so any measurements must take into account the internal facing nature of the development, which does not appear to be accessible from the A611, thereby increasing walking and cycling distances. The effect of this will be that any opportunities for new and compliant bus stops on the A611 are going to be restricted to a narrow window each side of the new signal controlled junction. The corresponding location of these bus stops may also impact on the previously modelled junction operation, thereby raising doubt over past conclusions regarding capacity levels. Given the specific requirements identified above as set out within the Highway Authority's published design guidance, further detailed information must be submitted to confirm how new bus stops will be provided, along with supporting Road Safety Audits to confirm delivery of this essential piece of infrastructure.

For cycling facilities the Table T3.2.1 simply states how the proposals must “*comply with Department for Transport LTN 1/20*”. LTN 1/20 is a comprehensive set of design guidance covering all aspects of the cycle infrastructure design. It is evident that the applicant has not given any thought to LTN 1/20 with no reference to it whatsoever in the Transport Statement, rather, reference is made to LTN 1/04 which is now withdrawn. I have not sought to undertake a detailed audit of the scheme in this regard as I believe this should be for the applicant to demonstrate full compliance, however, there are a few notable areas where the application should be supported by further details and infrastructure improvements before it can be considered compliant with this guidance.

- The proposals should be examined using the Junction Assessment Tool provided at Appendix B of LTN 1/20, extending to cover the full scope of new infrastructure being proposed as part of the entire scheme.
- A road safety audit should be supplied that fully considers how cyclists using the proposed facilities, including the proposed A611/Site Access signal controlled junction, would interact with other users.
- A full review of the proposed internal layout should be supplied to demonstrate compliance with LTN 1/20. This should cover routing through junctions, widths, stopping sight distances, gradients, need for verges/edge protection, and segregation from pedestrians.
- A detailed audit of on-site cycle parking provision (noting how Figure 11.1 of LTN 1/20 indicates that day parking for cyclists should be **within** 30 metres of the destination).

Refuse collections

Paragraph 5.10 of the Transport Statement confirms how the “*drawing demonstrates that the proposed site access could satisfactorily accommodate large vehicles entering and exiting the site in a forward gear*”. I note that the vehicle used in the assessment measures 11.347 metres, whereas the Highway Authority’s published design guidance refers to a standard maximum refuse collection vehicle size of between 11.5 and 12 metres. As a commercial scheme I recognise that smaller specific vehicle types can be conditioned for use in special circumstances. However, this will need to be addressed by way of a specific and restrictive planning condition unless updated plans proving that the larger vehicle type can indeed manoeuvre satisfactorily.

Car parking provision

Paragraph 5.8 of the Transport Statement states that a minimum of 117 car parking spaces should be provided at the site, with paragraph 5.9 confirming how 102 spaces are included within the masterplan. Interestingly, I count from the proposed block plan provided online a total of 108 spaces (allowing for spaces where lines appear to be missing on the plan). The applicant should clarify this point, although I would still have strong concerns about the minimalist approach being applied here.

Current policy guidance requires applicants to present parking proposals that reflect the specific aspects of the scheme location, type and size. The ratio of 1 car parking space per 30 sqm is a standard approach to delivering parking at offices in urban locations that benefit from high levels of public transport, opportunities for walking and cycling, and local housing/amenities. Whilst I read lots of words presented in the Transport Statement and Framework Travel Plan documents aimed at delivering a high quality scheme with good levels of accessibility, I simply do not see any evidence that this will be realised for this initial development scheme.



Whilst there is a current trend towards home working this should not be confused with reduced occupancy levels within offices. Simply speaking, tenants will most likely be seeking reduced floor area to serve greater numbers of managed occupancy. Research online suggests that offices with high occupancy levels can create densities of one person every 7 to 14 sqm. Offices with average occupancy levels can range from one employee every 14 to 23 sqm. Taking the figure of 1 employee per 14 sqm as the threshold between average and high density, this could result in the proposed offices generating up to 244 people working within the building at full occupancy. If we apply the 82% modal split for car drivers presented at Table 8 of the Transport Statement this would equate to a potential demand for 200 car parking spaces at the site, which could lead to an under provision of 98 spaces (based on the 102 spaces stated within the Transport Statement). This would almost certainly create significant accessibility issues with on street parking blocking turning movements, creating hazards for pedestrians and cyclists, and obstructing visibility splays at junctions.

Conversely, and for the proposed layout to operate satisfactorily, these calculations confirm how a strong and robust travel plan must be in place that connects to high levels of supporting infrastructure to ensure the necessary modal split of circa 40% car drivers is achieved. This would be a hugely optimistic target for any city centre based office development and one that I simply do not believe is achievable at this location, particularly given the concerns raised above regarding the site layout design and access to public transport infrastructure.

Summary

In my opinion, the failure of the previous application to address core accessibility issues is now being realised in fundamental flaws with the current scheme. In essence, Paragraph 110 of the NPPF requires that schemes are designed to deliver safe and suitable access for all users, with appropriate opportunities to promote sustainable transport modes being taken up, and that the internal layout meets with standard design requirements. In this instance I do not believe the proposed scheme fully satisfies any of these requirements and the application should be refused unless clear evidence can be provided to address these key principles.

I note that there is much talk of pending improvements associated with the wider development scheme, as referenced in the Highway Authority's own comments on the application. However, it should not be acceptable for this application to proceed without clear detailed information demonstrating how specifically this proposed office scheme would comply with current requirements. If as mentioned, there are established plans for new bus stops and service improvements, then these must be detailed within the Transport Statement for delivery as part of this application. Failure to secure these essential improvements at the start of the development will lead to severe parking problems within the site that could overspill into the surrounding roads, creating a further barrier to sustainable travel.

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 to hesitate to contact me.

Yours sincerely



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