

Date: 30 November 2019

Dear

NCC APPLICATION REFERENCE: FR3/4054
TOP WIGHAY FARM, ANNESLEY ROAD, LINBY

Bancroft Consulting were instructed by Linby Parish Council to review planning application FR3/4054 and would offer the following comments in respect of the application.

Background

In preparing my comments I have reviewed the following documents that were available online within Nottinghamshire County Council's planning database:

- Document 1 - NCC Highway Observations (dated 18.11.19)
- Document 2 - Planning Application Form (24.10.19)
- Document 3 - Gedling Borough Council Observations (dated 21.11.19)
- Document 4 - Ashfield Borough Council Observations (dated 11.11.19)
- Document 5 - Scoping Note (BWB Consulting) (dated September 2019)
- Document 6 - Systra Reference Case Assumptions (no date)
- Document 7 - Systra Trip Generation and Distribution Assumptions (no date)
- Document 8 - Access Appraisal (BWB Consulting) (dated 15.10.19)

The following comments seek to reflect national policy contained within Paragraphs 108 and 109 of the National Planning Policy Framework. This requires that all new developments should ensure that safe and suitable access could be achieved for all future users (Paragraph 108). It also states how applications should demonstrate there would be no unacceptable impact on highway safety and that the residual cumulative impact of a scheme should not be severe (Paragraph 109).

Concerns regarding junction modelling

Firstly, it is my understanding that this application is being made to determine vehicular access only, in advance of a full application being made for mixed-use development at the site in the near future. Paragraph 1.2 of the Scoping Note (Document 5) confirms how this future application would be for the following uses:

- up to 805 residential dwellings
- B1 employment use with a gross floor area of 34,802sqm

- B8 employment use with a gross floor area of 14,501sqm
- a primary school for up to 315 pupils
- a local centre with a gross floor area of 2,769sqm

The remainder of Document 5 sets out justification for utilising updated trip rates for the current proposals, set against a 2016 assessment that was adopted within the GNTM. Without going into the details of each selected trip rate, it appears to me that this process is logical and have no immediate reason to doubt the results. I do however note a particularly significant reduction in the peak hour residential trip rates is being proposed from that adopted within the GNTM (0.823 reducing to 0.498 (average) and 0.598 (85th percentile) for the morning peak hour rates). Whilst there is some merit in the justification for this reduction, it leaves little scope for fluctuation in any future junction design where capacity issues are predicted.

The application is then supported by an Access Appraisal (Document 8) which seeks to present a case for the design of a new signal-controlled T-junction at Annesley Road along with a fourth arm (and corresponding improvements) being added to the existing B6011/Waterloo Road roundabout junction. Document 8 sets out to explain how the overall site area has been split into two phases, namely the 'allocated land' and then a further (much larger) plot to the rear which is referred to as 'safeguarded land', with the overall objective of demonstrating how the previously consented layout could be suitably improved to accommodate the overall land use proposals (i.e. allocated and safeguarded). Paragraph 3.10 of Document 8 states.

"In summary, the main change to the previously consented arrangement is the increase in the flared two lane approach on the south-eastern Annesley Road arm and southern A611 arm. No changes are required to the safeguarded roundabout, the design of which remains suitable."

In this regard, I note that all modelling has been carried out at a base year of 2028, which therefore assumes all development will be completed within the next 8 years. In my experience, a realistic build out rate for new sites would be between 50 and 100 dwellings per year. This doesn't just take into account the effectiveness of the building process but also reflects the way the housing market reacts to new properties. Taking even the most optimistic projections, work would need to start in January 2020 for a January 2028 completion. There is no planning application yet submitted for this development and it is reasonable to assume that determining the application along with discharging all subsequent conditions could take up to 3 years before construction realistically commences. So, in effect, the best-case situation is that a Future Year modelling exercise of 2031 should be adopted, allowing for additional network growth and localised development. As a worst-case scenario (i.e. the lesser build out rate of 50 dwellings per annum) a Future Year modelling exercise of 2039 (2020 plus 16 years plus 3 years for planning) should be undertaken before any absolute conclusions can be drawn on the suitability of any Local Plan led infrastructure improvements such as this.

In reviewing the results of the modelling exercise for 2028 it is clear that, with the revised trip rates and improved layouts, the proposed network conditions would only just about

operate at theoretical limits of capacity. Whilst I accept that at face value this should be an acceptable position for planning, the scope for variation in the trip rates and probability of this scheme not being completed until a future year of 2039, leaves me thinking that the final outcome will be that of a highway layout that regularly experiences severe congestion and delays, potentially with corresponding highway safety problems. I believe this would be contrary to the requirements of Paragraph 109 of the National Planning Policy Framework.

Concerns regarding impact of pedestrian and cyclist activity within the proposals

Following on from the above concerns regarding the modelling, I would also question the 'traffic-led' strategy for addressing this potential development. Current policy for establishing new development and assessing the needs of the public highway clearly state how applications should consider a user hierarchy in movement that adopts the following priority – Pedestrians, Cyclists, Public Transport Users, Specialist Service Vehicles, and then finally Other Motor Traffic (taken from Paragraph 3.6.8 of Manual for Streets). The present proposals seem to be entirely focused on how new and improved junction layouts can be 'shoe-horned' into the current physical constraints based on predicted peak hour traffic flows.

A development of this type and size will clearly materially alter the way the current highway layout operates by changing its current function of primarily traffic movement to that of a sense of place, with far more demand for movement by all modes of travel. The current proposed highway layouts are very much focused on vehicular movement and do not take into account how the future conditions might require greater consideration of non-car modes. For example, the proposed signal-controlled junction-drawing layout includes crossings of the A611 at the western edge of the junction. However, it is well established that pedestrians will always follow direct desire lines and this layout presumes anyone wishing to arrive at the south-eastern corner of the junction from the eastern side of the access road, perhaps to connect with a bus stop or take the most direct route to employment development to the south on Waterloo Road, will take the arduous route of crossing the site access arm and then onto the opposite edge of the A611 via the western side of the junction. This is not the desire line and there is a clear risk of dangerous crossings taking place as a result of this arrangement. Surely, with the availability of land at this early stage in planning, this scheme should be including provision for pedestrians and cyclists to safely cross at all arms.

Another point of concern would be at the A611/Waterloo Road roundabout improvements. The principal character of this junction will change from an edge of village strategic semi-rural route to site access for a major new mixed-use scheme. The proposed improvements make no allowance for accommodating increased crossing demand by pedestrians and cyclists, seemingly utilising the existing approach of kerbed central islands at each of the arms.

Any consideration of the suitability of these improvements must be accompanied by a detailed assessment of potential pedestrians and cyclist crossings to determine the appropriate form of crossings at or in the vicinity of the junction. The operation of safe crossings at junctions can have a major impact on the available capacity, so it is difficult to

understand how any decision can be made on the suitability of the proposed layouts until such time as a full and detailed assessment of the proposed demand for travel has been undertaken.

Concerns regarding the lack of supporting information

My third area of concern relates to the lack of information being submitted in support of the proposed junction improvements. Highway safety is a key determinant in assessing proposals for highway improvements. It is apparent that the principle of the junction improvements has indeed been established from a previous consent, but the current proposed layouts differ significantly from that position and I am concerned that no evidence exists on file of an independent safety review. The Highway Authority regularly requires Road Safety Audits to be provided in support of such applications, and I am very surprised not to see that one has been undertaken for this application.

In reviewing the proposals I am concerned that there is no evidence to prove that two articulated lorries could turn right into the site via the new signal controlled junction (safeguarded land scheme) whilst in adjacent lanes. Or for that matter whether a large bus or coach could undertake this manoeuvre. Also, if bus stops are ultimately to be proposed within the site frontage, then what form would these take and how would the parked bus interact with the adjacent junctions. At the roundabout, whilst I accept that lorries may be an occurrence at present, it cannot be ignored that the intensity of large HGV turning movements would increase as a result of the future employment uses. The proposals include some tight entries and exits to the roundabout and the applicant should demonstrate how additional HGVs (and other users) could be safely accommodated within their lanes without the risk of conflict.

Summary

In summary of the above, current planning policy requires 'access to new development' to be all encompassing rather than simply focused on addressing the impact of predicted traffic movements. Policy guidance seeks to prioritise the predicted movement of pedestrians, cyclists and public transport users above that of normal road traffic. The application has presented two junction improvement schemes that on the face of it operate at the limits of their theoretical capacity with no supporting independent technical safety audits to support the approach. These results are based on a modelling exercise that includes significantly reduced trip rates and do not accurately reflect a realistic build out rate for the scheme and the consequences of traffic growth that would occur. Neither does the design exercise make any allowance for the way in which demand for pedestrian and cyclist activity will change in the area following implementation of any subsequent mixed-use development. This should be addressed in detail and incorporated within any highway improvement proposals such that the priority users of the network are considered accordingly, and the optimum infrastructure levels achieved.

Until such time as the above points have been addressed, I do not see how this application properly fulfils the requirements of current national planning policy in delivering sustainable development.

Ecology

Linby Parish Council support the comments made by the Conservation Team at NCC.

Linby Neighbourhood Plan

The Parish Council would like to state in this representation that the proposal is contrary to the following policies in the Linby Neighbourhood Plan:

- **Policy NE1:** Habitats, Trees and Hedgerows deals with the loss of hedgerows in development. The scheme is contrary to this policy.
- **Policy TRA1:** Traffic and Transport. This scheme is contrary to points 1,3 and 4

Yours sincerely,