

**Proposed Housing Development Site.
Land off School Lane, Marton.
Planning Application No: 15/2274M
For 27 Dwellings.**

**Technical Note
Addendum**

Prepared by

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Report No: P10-0033-NPC

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Mission Statement.

Progress10 Design have been appointed by **Marton Parish Council** to produce a technical addendum to the related June 2015 Technical Note In order to endorse the objections to this development proposal on the grounds of a lack of sustainability. The requirement is to identify issues of sustainability and the lack of realistic and practical options for modes of travel other than by car with regard to the Cheshire East Council planning application No: 15/2274C.

In addition **Progress10** will comment on detail aspects of the Transport Statement which accompanies the planning application, together with a Technical Addendum provided for the development and identify the shortfall and inaccuracies which the document contains with regard to the sustainability of the site.

The following technical addendum seeks to provide a view on the above mission statement to support the Parish Council in their representations at a public inquiry.

This information has been developed after: detailed research, site visits and appropriate site survey work to understand traffic conditions and the necessary junction design approach.

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Land off School Lane, Marton. Planning No: 15/2274M for 27 Dwellings.

Transport Addendum

1. Introduction.

Progress10 have produced the following technical addendum to support the concerns of Marton Parish Council with regard to a planning application at land off School Lane, Marton for 27 houses.

The planning application was refused by the Cheshire East Council Northern Planning Committee in October 2015. The grounds were that the proposed development was not sustainable. This decision taken by members after the presentation of significant objections from local residents and the Parish Council on the grounds of a lack of sustainability as well as a number of significant other factors.

2. Site description and local highway network.

The site comprises 1 parcel of greenfield land with its main frontage to the adopted public highway of School Lane.

School Lane is a local village lane which serves the Marton and District CE Primary School and a small number of local residential properties. The lane has sufficient width for two vehicles to pass up to a point just beyond the school where the lane becomes less wide and more rural in nature.

Beyond the school the 30mph speed limit changes to national derestricted (60mph). There is no street lighting along School Lane and there are no footways with just a small amount of pedestrian refuge outside the school itself. There are very narrow highway verge areas which provide very limited pedestrian refuge against the hedge lines and this was noted as an uncomfortable position for pedestrians at the site visit. This is the environment within which school pupils are delivered to school by parents on a daily basis in term time.

Oak Lane has a junction with School Lane immediately alongside the south west boundary of the school and also with the north east boundary of the proposed development site.

There is no street lighting on this length of Oak Lane fronting the site and the carriageway is extremely narrow down to as little as 3 metres in width in places. This restricted width will not allow two cars to pass. There are no identifiable passing places along the frontage of the site at this location.

Despite this, the presence of passing places is claimed in the submitted Transport Statement (TS).

There are passing places further along Oak Lane however they do not front the site and give the site no benefit. In addition these localised widenings on Oak Lane frequently hold parked vehicles which renders them unavailable.

3. Proposed site access junction.

The proposed access is for a priority controlled junction on the School Lane frontage and the TS provides speed survey readings taken from an automatic traffic counter which was employed on site and which record both traffic flow and speed.

The junction design has been the subject of revisions due to the invasive nature of the required construction on significant local trees fronting the site.

It is indicated to serve a 4.8 metre wide carriageway at the junction mouth and SK Transport Dwg No: SK21519-003 (Rev A), demonstrates the offered junction geometry along with the proposed visibility splays which are based on Manual for Streets guidance against measured 85th-ile vehicle approach speeds.

Despite errors in the original TS speed figures, it is understood that the CEC Strategic Highways team are happy to accept the visibility splay design.

It remains to be seen whether this junction design would remain inherently safe given the design approach and the local factors of congestion at school arrival and dispersal times.

This is compounded by the multiplied junction turning movements which are likely to be generated by parents frustrated by being unable to park within the development, or on street, due to the density of school arrival and dispersal traffic in the morning peak hour as well as mid-afternoon.

In addition and due to the heavy on-street parking at school arrival and dispersal times local traffic and vehicles visiting the site are often forced to travel on the wrong side of the road when approaching the A34 junction.

3. Sustainability.

The TS claims that this site is sustainable in a number of ways.

Clearly there are some local facilities however to complete a family shop or travel to out of village facilities the Transport Statement suggests that the site is sustainable by: pedestrian links, cycle links, bus links and by car to the railway station to take a train. It also notes that there are cycle stands at the railway station.

There is also a reference to a previous D&G bus service which is no longer provided.

The TS is also accompanied by a Travel Plan Framework which gives appropriate general comments about Travel Planning and its management.

Marton Parish Council express concern regarding the sustainability of the site as the claimed links within the TS are given status beyond their actual facility.

The TS states that the site will be sustainable via pedestrian links which are: 'pedestrian leisure routes', however these routes are not defined and tied into the body of the TS though reference is made to public rights of way and lowly trafficked roads.

The Parish Council are concerned that with no real pedestrian refuge and despite low traffic volumes, there is a real concern over pedestrian vehicular conflict should these local carriageways be relied upon by the new development.

Unfortunately, carriageways will be relied upon by the development as there are significant breaks in the connectivity from the development to the limited existing pedestrian links.

Provision of new footways.

With the revised junction design and the fact that there was insufficient control of land to provide a frontage footway link to the A34 the site now fails to provide this requirement.

The Highway Authority have expressed no concern that pedestrians will need to walk on the carriageway in live traffic for a distance, however this does not overcome the fact that in provisional terms the development proposal does not provide this pedestrian link, despite an original intention to do so.

This incremental step towards the provision of a sub-standard development in terms of sustainable links and quality of design and facility must be a negative indicator in this respect.

Had the original research on the site been thorough, this incremental path towards a less than satisfactory position may have been seen to be less acceptable than the current position allows.

There remains no offered technical design for the footways proposed and the fact that the Highway Authority have required an informative for a Section 278 agreement leaves the design open at this time despite the access strategy for the site being the only detailed matter within the application.

These restrictions on the potential for minimum design standards are a real concern without an offered design and again any design which provides new features within the existing public highway should be subject to the Road Safety Audit process which has not been provided within the application detail.

Clearly this would be required at S278 stage, however if a safe design is not available at that time – should the development go ahead – will this lead to a further reduction in standards?

This lack of detail is a real concern for the Parish Council and Progress10 Design consider that this should still be deemed a lack of information in an outline planning application which has access strategy as a detailed aspect of the application proposal.

Indeed even in the revised access drawing the frontage footway proposed for School Lane still relies on highway verge only, and can no longer connect to the existing narrow footway at the junction mouth of School Lane with the A34.

This existing footway is only 0.6 metres wide at this point and this does not constitute sufficient refuge at minimum highway standards, even when pedestrians have gained this position after crossing a significant length of live carriageway to get there.

Clearly this arrangement will put pedestrians at risk in a traffic environment which at peak flow hours and especially at school arrival and dispersal times is congested and has a high frequency of turning movements at the junction of School Lane with the A34.

New development should not put pedestrians in an environment where they are at risk and this development proposal fails to demonstrate a design approach which appropriately provides for pedestrian safety and accessibility.

Proposed footway link from the development to the A34.

Marton Parish Council are concerned that the proposal to provide this footway link will have an adverse impact on the frontage trees and hedge bank and in highway design terms the following information is considered to be relevant.

The proposal for this footway is shown on the master plan for the development and is referenced in the Transport Statement (TS).

On inspection it is clear from the A34 frontage that there is a high hedge bank on this frontage which is approximately 1.5 metres higher than the carriageway of the A34. There is no footway provision at this point. The hedge bank also supports mature trees.

The requirement at this point would normally be for the provision of a 2.0 metre wide frontage footway and such a footway is shown on the master plan. The existing verge is broadly wide enough to support this level of provision.

However whilst this provision is shown in plan view there is no drawing to demonstrate cross section or indeed level differences and no detailed design is provided.

The Highway Authority have not secured the requirement for detailed drawings either by negotiation or by planning condition and are relying on a S278 informative when appropriate detailed design may not be able to be achieved.

There is also a question with regard to the safe generation of pedestrian traffic onto this frontage.

Without a design which will safely receive pedestrians and perhaps provide a staggered barrier or similar to reasonably slow pedestrians or even cyclists before meeting the A34, there is no offered detail of a safe design.

The significant level differences will also demand excavation to match emerging levels onto the A34 and this will have a significant impact on the root spread of the mature trees on this frontage and reduce their stability and be likely to affect their life. Indeed it is very likely that these trees would be lost to this footway provision.

Once again, the application does not provide detailed design for this pedestrian link despite the entry on the application form that access is not a reserved matter.

Cycle Routes.

It is accepted that there is a recognised cycle route (No 55) which gives a continuous route to reach facilities in Congleton and the Parish Council agree that this is the case. This is the only cycle route which is available on the recognised network.

It is however a concern of the Parish Council that this route whilst available is circuitous and only reaches Congleton by a more lengthy route than can be taken by convenient transport such as the private car.

Indeed National Cycle route 55 is almost 8 kilometres from Congleton town centre which is significantly further than recognised acceptable cycling distances. In addition the route is both tortuous and narrow with blind bends and no refuge or lighting.

The route has significant gradients which would challenge all but regular cyclists, so choosing this route and mode of travel for a food or other shopping trip or as travel to work would be impractical, especially in winter.

It is therefore considered that whilst this cycle route is available, it is unlikely to be attractive as a commute to work or indeed to do a family shop and therefore the Parish Council feel that this route is only of limited value and should not be considered to be a robust provision locally for anything other than leisure cycling for exercise or recreation.

Progress10 concur with this view and having cycled the cycle route which links to Congleton it measures more than twice the measured distance of a short car journey to the same destination via the A34 and more than ten times the duration.

This cycle route is not likely to be considered a practical option to the use of the car from this rural village when needing to complete significant retail trips or work travel.

Bus Service.

The Parish Council have expressed concern that the D&G bus service referenced in the TS is limited to: dial service 24 hours in advance and only for passengers with disability and over the age of 80.

The SK Transport TS states at 5.1 that:

'Marton is served by D&G Little Bus Service. This is a demand responsive, flexible bus service providing public transport connections for rural areas in Cheshire East.'

Unfortunately this statement is incorrect.

Contact with D&G has revealed that in fact this service is no longer provided by D&G and their service only reaches as far north as Congleton itself.

The claim that Marton is served by bus as a sustainable mode of transport is therefore incorrect in terms of the D&G service and no other bus service exists.

Congleton railway station.

The TS quite rightly states that the railway station in Congleton can be reached by cycle journey and that there are cycle stands at the railway station and the TS also references car travel as the likely option to reach Congleton railway station.

Unfortunately the TS fails to recognise that Congleton railway station is 9.5 km from Marton and therefore almost twice the recognised 5 kilometre distance for regular cycle journeys. It is therefore not practical to cycle to the railway station for an onward journey if you live in Marton and this cannot be considered to be a sustainable travel opportunity.

Conclusion.

The Parish Council consider that the claim that the proposed development site is a sustainable site is flawed and the examination above in this report does provide evidence which would support that view.

Sustainability and planning policy.

In the planning report for this development proposal dated 7th, October, 2015, the LPA state reasons why the development should be allowed against a broad overview from the NPPF policies.

The LPA quote all of the reasons the NPPF gives for allowing development however in the area of sustainable travel, its benefits and the lack of facility for this site there is certainly an opportunity to examine this in more detail.

Marton Parish Council are concerned that Marton village does not have sustainable travel options and that the site will be car travel dominated which does will not align with the intentions of the Neighbourhood Plan, which will require new development to provide for sustainable transport and encourage its use above single car occupancy journeys.

The application detail does not provide this level of attention to sustainable transport issues:

- It claims sustainable links where none exist.
- It does not acknowledge the concerns regarding junction design and the congestive parking at the school.
- It does not provide ratified design for pedestrian links which may or may not be achievable.
- It expects pedestrians to walk in live traffic.
- It claims use of cycle links which are completely impractical for travel to work or shop.
- It claims cycle links which are clearly significantly outside recognised travel distances.
- It claims sustainable links to Congleton railway station where only car journeys are practical and convenient.

This development proposal does not offer or reasonably promote sustainable modes of travel or indeed reasonably improve those very limited facilities which do exist.

In this respect Progress10 consider that the view of the Parish Council, which insists that this site is not sustainable in terms of travel is justified and robust. The Parish Council do consider that under the requirements of the NPPF this site is not sustainable development.

Despite the employment benefits to the construction industry and the other latent planning benefits, the travel issues and associated traffic congestion together with the potential public highway hazards, are a significant concern and that in local terms the impact from this site could be considered severe under the terms of the National Planning Policy Framework.

4. Highway Safety.

The original developer proposal was to provide a small local car park intended to serve school arrival and dispersal traffic however this has now been removed by the applicants and therefore any mitigation of displaced car parking for school arrival and dispersal traffic has been lost. This car park was to face the side pedestrian entrance to Marton school in the revised plan before the car park was removed from the scheme.

This loss of off-street parking is significant as the introduction of a new junction onto School Lane will reduce the amount of available space for parking which is fully utilised by parents at school arrival and dispersal times currently.

In addition the fact that the on-street parking will become more congested means that this new junction will frequently be obstructed, both in visibility terms for emerging traffic and also potentially for turning movements into and out of the junction.

Combine this situation with the fact that the on-street parking will force vehicle to travel on the wrong side of the road approaching the junction and there is a significant potential for hazard at the junction in excess of that normally expected.

These issues are significant and have not been given the weight that Marton Parish Council feel was appropriate.

Progress10 do consider that this view taken by the Parish Council is of merit and should be a contributory factor in decision making on this development proposal.

Any development which does not provide a properly designed and safe access strategy at a time when access is a detailed matter, should have a presumption that design and detail is inadequate and decision making should be influenced by these factors.

This development does not:

- Provide a detailed safe design for pedestrian access strategy.
- Provide safe pedestrian link design to the existing adopted footway infrastructure.
- Demonstrate sustainable cycle links to the necessary facilities in Congleton which are appropriate and fall within recognised cycling distances.
- Recognise that there is no local bus service available for sustainable modal travel. In fact it claims there is a bus service when none exists.
- Acknowledge that the railway station in Congleton is so far away that it is double the distance of recognised cycling distances for sustainable cycling journeys. In fact it claims that cycle travel to the railway station is acceptable for onward journeys.

It must be concluded therefore that despite the LPA reasoning that the overall balance of the proposed development does constitute sustainable development against various paragraphs in the NPPF that in transport terms the site falls short of a sustainable position in every respect.

It is considered that there is a genuine concern that this site is not sustainable in highway terms and due to a lack of facility locally and proposed design would produce a development which is likely to be less safe in highway terms than other better located sites would be.

6. Overview of the Transport Statement.

Marton Parish Council have read the TS and have discussed some points which they feel are not accurate in detail when considered on site at School Lane.

Progress10 have assessed the TS and find a number of areas where the detail appears to be incorrect. They are numbered in the TS as follows:

2.3 'Marton is a small village with a population of circa 300 benefitting from excellent links to Congleton and other regional destinations via the A34.'

It is clear from the assessment above that the pedestrian and cycle links are actually poor and the bus service no longer exists.

2.8 'Oak Lane is a generally single track lane circa 3m in width with short sections of widening allowing vehicles to pass.'

There are no passing places on the Oak Lane frontage to the site.

2.12 'Existing traffic flow levels are very low with less than 400 vehicle movements per day in each direction. Peak traffic levels clearly coincide with school arrival and departure periods on weekdays.'

There is no real assessment of the on-street parking at school arrival and dispersal times and the Parish Council have much photographic evidence that this parking reaches back to and the adjusted proposed junction position in the morning peak hour. The extent of the parking is acknowledged at 2.6 in the TS but the potential obstruction to the junction and its visibility splays is not considered.

4.13 'Policies T2, T3, T4 and T5 of the Local Plan outlines support for development that promotes and caters for opportunities for movements by walking, cycling and public transport. The TS shows that the proposed layout, village location and existing sustainable transport infrastructure meet the requirements of the Local Plan.'

Given the doubt cast on the sustainability of the site by the Parish Council and the assessment in this report which identifies shortfall in these sustainable travel opportunities there is significant doubt that the TS is accurate in this regard or indeed that the TS does show compliance with the Local Plan requirements. The later Technical Note provided by the applicant continues to fail to address these issues.

5.10 *'Marton is served by D&G Little Bus Service. This is a demand responsive, flexible bus service providing public transport connections for rural areas in Cheshire East.'*

Marton is not served by a D&G bus service.

5.13 *'Access opportunities exist by public transport that are in line with the advice on rural developments in NPPF.'*

The quality and practical use of these sustainable links is thrown into doubt by the views and knowledge of the Parish Council and the evidence in this report confirms that view.

From the Travel Plan:

2.6 *'Signalised crossing points are provided on Belle Vue Road north and south of the site at the junctions with Greyfriars Road and Betton Street.'*

All of these named public highways appear to be situated in Shrewsbury.

Vehicle Trip Rates.

The trip rates for traffic generation given within the TS are taken on a general examination of the TRICS database and this has drawn on data from many suburban sites within TRICS.

Suburban sites are not a good match for the rural nature of Marton village and Progress10 consider that a more accurate production of trip rates would have been gained from either: specific selection of rural sites from within the TRICS database or a specific site survey of a similarly situated site of comparable scale within the Cheshire area.

Clearly this has not been considered and the trip rates offered are relatively low for such a remote rural location which has limited sustainable transport options.

The above issues all provide question against the accuracy and validity of the Transport Statement provided in support of this planning application and given the strength of the concerns of the Parish Council should be considered as material evidence in their favour.

Subsequent Technical Note.

Subsequent to the early objections to this development proposal the applicant supplied a highway technical note from their own consultant which updated some of the details for the application.

The TN did not address the concerns over the inaccuracies in detail which had been brought to light. Nor did it address the lack of detail on access strategy or the mistakes and misleading details on sustainable transport links.

The application therefore still renders a significant lack of information in highway terms which does still constitute a lack of relevant information.

7. Conclusion.

Progress10 have considered the real concerns of Marton Parish Council and have provided assessment of relevant areas of the submitted Transport Statement and examined details against them. The additional Technical Note has also been considered.

The Transport Statement and Technical Note still fall short of detail in terms of design provision and does not provide evidence in a number of areas noted above. It also has incorrect details within the body of the document such as bus service provision and incorrect site references.

In addition there are questions regarding safe highway design which remain unanswered given the lack of sufficient room to provide footways.

The two documents do not comply with policy in the NPPF or the need to promote and provide for sustainable transport options.

As a result Progress10 Design maintain the view that the application detail does not provide an appropriate level of detail to demonstrate a safe and sustainable access strategy for the site.

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