

210609-01 Written Highways and Transportation Representations:

Planning Application: W/22/0465 Proposed Residential Development, Woodcote Lane, Leek Wootton

1. Introduction

The Transportation Consultancy (ttc) have been appointed by Leek Wootton & Guy’s Cliffe Parish Council (LWGCP) to provide independent Transport and Highways advice for an already registered planning application reference: W/22/0465 for the following description of development.

“Erection of 83 dwellings (including affordable housing), access, internal roads and footpaths, car parking, public open space, landscaping, drainage and other associated works and infrastructure”

This review has considered the content of the following transport and highways documents submitted as part of the planning application to the Local Planning Authority (LPA), Warwick District Council (WDC) set out in **Table 1**.

Table 1 – Applications Documents Considered as part of this review

Document	Authors	Date
Transport Assessment	Cotswold Transport Planning (CTP)	March 2022
Residential Travel Plan	Cotswold Transport Planning (CTP)	March 2022
Drawing Number: SP07B	Cotswold Transport Planning (CTP)	2.2.2022
Drawing Number: SP06B	Cotswold Transport Planning (CTP)	2.2.2022
Drawing Number: SPO9AO	Cotswold Transport Planning (CTP)	7.2.2022
Drawing Number: SPO8A	Cotswold Transport Planning (CTP)	7.2.2022
Drawing Number: SK01C	Cotswold Transport Planning (CTP)	19.5.2021

2. Purpose of the Report

This Written Highways and Transportation Representations has been produced by ‘ttc’ on behalf of the Parish Council to provide an independent review of the application.

3. Consultation Responses

As part of the application the Local Highway Authority (LHA) are Warwickshire County Council (WCC) who will be responsible for determining the transport and highways aspect of the development. As yet the LHA have offered no position on the application. WCC were involved in pre-application discussions with the applicant although no formal response was provided at the time.

4. Planning History

The proposed development site is part of an allocated site known as ‘Policy DS22’ under the ‘Warwick District Local Plan (WDLP) Former Policy HQ (DS22) *‘The former Police headquarters site will be developed for housing purposes’* A number of 115 dwellings have been identified at the former police headquarters under the local plan.

5. Appraisal

A full Transport Assessment (TA) and Residential Travel Plan (RTP) has been prepared by consultants ‘Cotswold Transport Planning (CTP)’, which was submitted as part of the planning application in April 2022.

The review of the submitted TA and RTP has been prepared in accordance with the chapter titles of the reports and summarised within **Table 1**. Only sections within the TA where commentary is warranted, or confirmation of review and acceptance of the content, have been selected. The table includes a ‘RAG’ assessment (Red, Amber, Green) to categorise whether the item raised is contentious or warrants further action, with the following definitions applied:

- **Green** – no technical issues and/or policy compliant;
- **Amber** – informative issue requiring further consideration; and
- **Red** – significant issue that is a material concern.

To determine the severity of the issues raised, due consideration has been given to the National Planning Policy Framework (NPPF) July 2021, which ultimately establishes whether the severity of the issue would warrant sufficient merit to form a material objection to the application. The key policy paragraphs in this regard are:

Paragraph 110, which identifies that plans and decisions should take account of whether:

- *‘Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- *Safe and suitable access to the Site can be achieved for all people; and*
- *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.’*

Paragraph 111, which refers to the impacts on highways and states:

- *‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.’*

Paragraph 112, which identifies that developments should be located and designed where practical to:

- *‘Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- *Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*

- *Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- *Allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- *Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.'*

Table 1 sets out the results of the review, with due regard to the key policy paragraphs outlined above.

Table 1 Review of submitted TA and RTP

Chapter Title	Subsection	Comment	RAG
Transport Assessment (TA)			
1. Introduction	Paragraph 1.3	We note the site is outlined within the Warwick District Local Plan (WDLP) under policy DS22 Former Police HQ for an estimated 115 dwellings.	Green
	Pre-application consultation Paragraph 1.6 – 1.9	<p>We note that pre-application consultation was undertaken with the Local Highway Authority (LHA), Warwickshire County Council (WCC) through a scoping note and initial meeting.</p> <p>It was noted that WCC had not reviewed the scoping note before the meeting and that no written comments were received from WCC Highways before the Transport Assessment was produced and the application duly submitted.</p> <p>We would have expected agreement on the key aspects of the Transport Assessment to be reached before the TA had been produced and submitted.</p>	Yellow
	Relevant Planning Background	We note the planning history for the site and the previous applications for the site have been appropriately identified.	Green
2 The Site and Adjacent Highway Network	Local Highway Network	The Local Highway Network has been identified and described appropriately.	Green
	Local Highway Safety	The personal injury collision data has been obtained and verified using 'Crashmap' and is considered correct and appropriate.	Green
3. Site Accessibility	Proximity to Local Services and Amenities – Walking	<p>The TA sets out the accessibility of the site by foot and references guidance contained within Paragraph 4.4.1 of Manual for Streets (MfS) states that walkable neighbourhoods are typically characterised as having a range of facilities within 10 minutes walking distance (around 800 metres). However, it states that this is not an upper limit and that walking offers the greatest potential to replace short car trips, particularly those under 2km.</p> <p>In addition, the Department for Transport (DfT) National Travel Survey of 2019 confirms that 80% of all trips less than a mile (1.6km) are carried out on foot.</p> <p>Taking the above into consideration the facilities available to future residents that are within a 10-minute walking time or circa 800m include the Leek Wootton Sports Club (where membership is required), The Anchor Inn PH, a Beauticians, All Saints Church and Bus Stops on Warwick Road.</p> <p>This would suggest that the development <u>cannot</u> be considered a 'walkable neighbourhood' given the lack of basic services and facilities within walking distance such as employment opportunities, food stores, post office, GP surgery, a primary school and regular and reliable public transport connections (addressed further below)</p> <p>The TA concludes that <i>"it has been demonstrated that the application site can be considered as having good accessibility within an existing village community with local facilities available within walking and cycling distance."</i></p> <p><i>"The application site is therefore considered to have the potential to promote sustainable transport modes and reduce single occupancy car dependency."</i> 'ttc' disagree with this</p>	Red

Chapter Title	Subsection	Comment	RAG	
Transport Assessment (TA)				
		<p>conclusions and in fact the evidence presented demonstrates that due to the distance to local services and facilities, it is considered highly likely that to access such services and facilities would be made by private car trips and would therefore reduce the sustainability of the site and increase the dependency on car use to access services and facilities.</p> <p>As a result, the site would require significant mitigation and financial contributions to make the site sustainable and therefore inline with Paragraph 112 of the NPPF in regards to sustainability.</p>	<div style="background-color: red; width: 100%; height: 100%;"></div>	
	Cycling	<p>The TA makes reference to the following “Cycling has the potential to substitute for short car trips, further facilitating sustainable travel, particularly those trips under five miles (8km) and trips of 30 - 40 mins are considered acceptable for commuting purposes. The growth of electric bikes is also increasing the propensity to cycle and reducing journey times. The local amenities detailed above which are within 2km of the application site, present the opportunity for residents to walk and cycle to these to / from these destinations in favour of a single occupancy private car journey. Furthermore, with reference to the above detailed DfT guidance, it is also considered that cycle trips may be a suitable form of transport to access the surrounding facilities and amenities from the application site.”</p> <p>The statement from the TA is very questionable, although we note the presence of a national cycle route in close proximity, there are no dedicated cycle infrastructure or facilities along any of the local roads near to the site. Warwick Road is a busy, unlit single carriageway which is unattractive for cyclists. These observations are supported by the 2011 census which shows that only 1.15% of residents travel to work by bicycle.</p> <p>As a result the site cannot be considered to be accessible by bicycle or likely to promote this mode as a viable alternative to the private car given it’s location and lack of facilities.</p>		<div style="background-color: yellow; width: 100%; height: 100%;"></div>
	Local Bus Services	<p>The TA identifies that the nearest bus stop to the site are located on Warwick Road, approximately 100m from the site. The TA identifies that the bus stops serve the 16 service which provides 4 services a day between Hatton and Kenilworth.</p> <p>However, the Parish Council have recently received notification that the number 16 bus service is to be suspended immediately due to financial viability and therefore the site will be left without a functional bus service. Further reducing the sustainability of the site and dependence on private car journeys to access the site.</p> <p>Therefore the following statement from the TA is extremely misleading. “Public transport is available within Leek Wootton for travel further afield with the existing bus service route offering access to services and amenities in the neighbouring settlements of Kenilworth and Warwick. “ The TA fails to identify that the site will be left without access to public transport.</p>		
4. Relevant Transport Planning Policy and Guidance	The correct national and local policy has been identified with the Transport Assessment in regards to the development proposals		<div style="background-color: green; width: 100%; height: 100%;"></div>	
5. Development Proposals	Access Strategy	<p>We note the access strategy for a simple priority junction onto Woodcote Lane from ‘The Paddock’ site. The junction proposals have been reviewed and it has been designed in accordance with the correct standards.</p> <p>There are no formal parking controls along Woodcote Lane and vehicles are regularly parked on Woodcote Lane which reduce the effective width of Woodcote Lane to one-way and restrict the visibility for on coming traffic. The applicant has failed to demonstrate how this will be addressed and controlled as part of the access strategy.</p>	<div style="background-color: yellow; width: 100%; height: 100%;"></div>	
	Internal Layout	We note the internal layout and are in agreement with the layout put forward.		<div style="background-color: green; width: 100%; height: 100%;"></div>
	Refuse and Recycling Collection	The whole width of Woodcote Lane is required for the refuse vehicle to turn, as stated above there is on-street parking on Woodcote Lane and it remains to be seen how the applicant will control this element to keep parking away from the junctions so that refuse vehicles can enter the site.	<div style="background-color: yellow; width: 100%; height: 100%;"></div>	

Chapter Title	Subsection	Comment	RAG
Transport Assessment (TA)			
	Car and Cycle Parking	The parking provision has been identified in regards to the correct locally prescribed standards.	Green
6.Forecast Trip Generation	Trip Generation	<p>We note that the industry standard TRICS database has been interrogated to determine vehicle generations from the proposed development site. The presented trip rates and vehicle trips have been verified by local survey data taken from residential sites in Leek Wootton.</p> <p>The local survey data has verified that the proposed trip rates are considered as an appropriate trip generation from the site and we are in agreement with the use of these.</p>	
7.Trip Distribution and Assignment	Trip Distribution	We note that the trip distribution has been calculated by recorded surveys which has been applied to the trip generation. This approach is welcomed and we are in agreement with this approach.	
8.Highway Impact Assessment	Base and Forecast Traffic Flows	<p>A capacity assessment has been undertaken on the Warwick Road/Woodcote Lane junction to determine the future operation of the junction with the addition of the development traffic.</p> <p>Future assessment years of 2022 and 2027 have been identified and growth factors have utilised the TEMPro database, specifically set 'Warwick 004 MSOA' which is identified as appropriate.</p>	Yellow
	Junction Capacity Assessment	<p>The industry standard software JUNCTIONS 10 has been identified and a model of the Warwick Road/Woodcote Lane junction has been built using geometric measurements, the traffic flows for 2022 and 2027 have been added to the model. This approach is considered appropriate.</p> <p>The results from the modelling assessment reveal that the junction operates with large amounts of reserve capacity for the future year assessment with the addition of the development traffic.</p> <p>It should be noted that the results from the junction modelling assessment reveal that queuing and delay is added onto the right turn from Woodcote Lane to Warwick Road South, in the AM peak hour. The applicant comments that this is not significant, but we believe this to be linked to the substandard visibility of the junction which will be required to be addressed and discussed in greater detail below.</p> <p>It should be noted that the PCU factor used in the modelling assessment for Heavy Vehicles is 2 PCU, we would expect 2.3 or 2.5 to be used as per standards. The junction needs to be re-modelled with the correct PCU factors.</p>	
	Warwick Road/Woodcote Lane junction Visibility Assessment	<p>The assessment concludes that the required 43m of visibility cannot be achieved at the junction, further commenting that 39.7m of visibility can be achieved with a 1m off set and the full 43m achieved with a 2m 'x-distance.'</p> <p>'ttc' have undertaken their own visibility assessment and it has been determined, it should be noted that only the visibility to the south (looking right) is in question.</p> <p>In accordance with visibility standards, 30m of visibility can be achieved at a 2.4m 'x-distance', a 2m 'x-distance' should only be appropriate in lightly traffic and low speed situations as prescribed in Manual for Street of which Warwick Road is not suitable for an 'x-distance' of 2m.</p> <p>The substandard visibility to the right is evident in the junction assessment where increase queuing and delay occurs due to the substandard visibility which impacts vehicles to leave the junction in an appropriate manner. The plan of the visibility assessment is provided in Appendix A.</p> <p><i>"The assessment concluded that the existing visibility splays are suitable and no off-site highway works are required to improve this junction."</i> We are in disagreement and would encourage the applicant to mitigate against the sub-standard visibility to guard against any highway safety issues and improve the efficiency of the junction.</p>	

Chapter Title	Subsection	Comment	RAG
Transport Assessment (TA)			
Residential Travel Plan (RTP)			
Residential Travel Plan (RTP)	4.Objective and Targets	<p>We are in dispute with the modal shift targets set out in the RTP in Table 4.1. Given the unsustainable nature of the site, some of the targets for modal shift over the course of five years are unrealistic.</p> <p>Following commitment for mitigation to improve the sustainability of the site, we would require that the applicant revise the modal shift targets.</p>	

6. Summary and Conclusions

6.1 Summary

A thorough and technical review of the transport and highways documents submitted as part of application 22/0465/OUT has been undertaken by 'ttc' on behalf of the Leek Wootton and Guy's Cliffe Parish Council.

Based on the review undertaken the following key issues have been identified;

- The sustainability of the site location as a sustainable 'walking neighbourhood' is highly questionable and although the TA identifies links to a number of existing limited facilities and a bus stops, of which the only service is due to cease, there are very few services and facilities within Leek Wootton that future residents would require regular access to and as a result, it is highly likely residents will be expected to drive to these facilities, which are situated outside of Leek Wootton village.
- The only available bus services which serves Leek Wootton (Number 16) is due to cease with immediate effect and confirmation has been received from the local operator Stagecoach.
- No control to restrict on-street parking on Woodcote Lane has been identified or proposed to assist with the proposed access and movement of the refuse vehicle.
- The PCU values in the modelling assessment are incorrect and should be amended.
- Visibility of the existing junction between Woodcote Lane and Warwick Road is sub-standard, the proposed development increases the level of traffic through the substandard junction which is of a concern to highway safety and the efficient operation of the junction.
- The modal shift targets set out in the travel plan are unrealistic in relation to the sustainability of the site.

6.2 Conclusion

The principle of development for the proposals is not in question, although as a result of the key issues identified above, the Parish Council find it difficult to support the application in its current state.

At present the proposed development falls short of the requirement set out in Paragraph 112 of NPPF whereby priority should be given to pedestrian and cycle movements and access to high quality public transport.

Should suitable action be taken to mitigate against the problems identified, the Parish Council would actively consider any revised proposals by applicant which address and overcome these issues

The Parish would welcome discussions to provide the following improvements to mitigate the impact of the development and to accord with National Planning Policy.

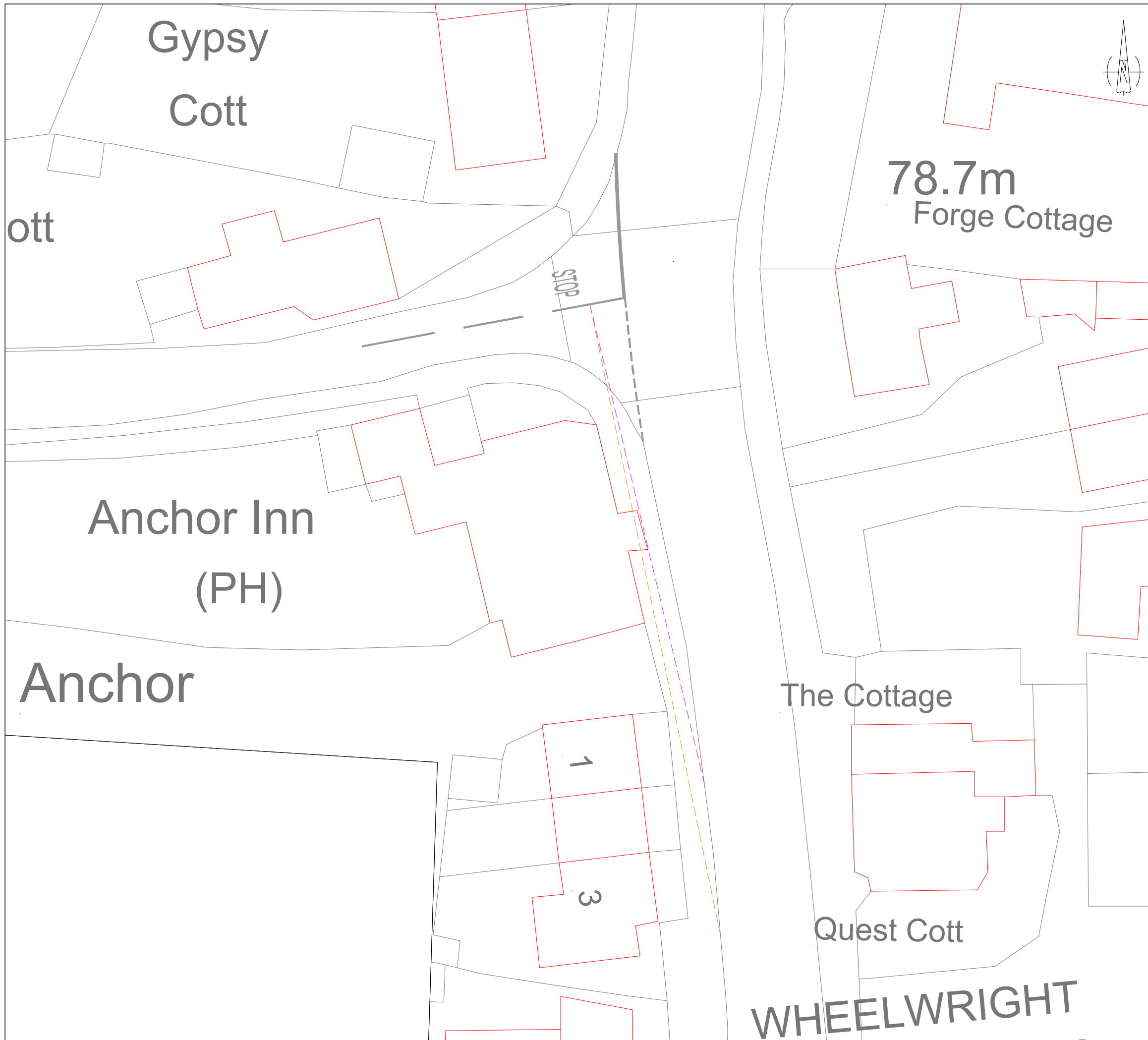
- Highway safety improvements to the Warwick Road and Woodcote Lane junction, specifically to address the existing sub-standard visibility.
- A parking solution satisfactory for all residents and users of Woodcote Lane including refuse vehicles.
- Financial contribution to aid a cycle and walking link along Warwick Road between Leek Wootton and Kenilworth and Warwick.
- Provide financial contributions for a bus service to support the proposed development.

Third party disclaimer

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Appendix A

Visibility Assessment



Date of 1st Issue 20/04/22	Description First Issue	Drawn by LF	Checked by GB
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Key:

- Existing
- Achievable Visibility Splay (2.4m x 32.8m)
- Required Visibility Splay (2.4m x 43.0m)



A3 SCALE
1:250

Drawing Title

Leek Wootton
Woodcote Lane / Warwick Road
Visibility Splays

Architect

Drawing Status

Planning

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Drawing Number 210609-01	Revision -
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