

TECHNICAL NOTE

PLANNING APPLICATION PO/18/1857

OUTLINE APPLICATION FOR UP TO 110 DWELLINGS WITH LAND FOR
A NEW PRIMARY SCHOOL ON LAND OFF BERESFORD ROAD, HOLTRESPONSE TO INDEPENDENT REVIEW OF
HIGHWAY AND TRANSPORT MATTERS

DECEMBER 2019

1.0 INTRODUCTION

A planning application (reference PO/18/1857) is currently under consideration by North Norfolk District Council. The application is outline with all matters reserved except access. The application is for up to 110 dwellings with, in addition, two hectares of land to be transferred to the County Council as a site for a new primary school. The application has not been subject to any objection from the Council's main transport advisor, Norfolk County Council as Highway Authority. This follows extensive consultation with the Highway Authority over the actual location of the school site, the principle for the internal road layout and the access points (and in particular the design of the emergency access). Nonetheless, North Norfolk District Council, at the request of Members, have commissioned an independent review of the highway aspects of the application. This was carried out by Edwards and Edwards Consultancy Limited. This is a comprehensive document covering a range of items but in its summary recommends some additional information on some aspects of the application. This additional information was summarised by the Case Officer as follows:

“The introduction to the Transport Assessment (TA) produced by Stirling Maynard (SM) advised that ‘..... **The school does not form part of this application but is taken into account in this assessment for completeness.**” I have a fundamental issue with respect to this contention for two reasons. Firstly, the primary school is part of the outline planning application and secondly the submitted Transport Assessment and Framework Travel Plan have not taken into

account the primary school in sufficient detail to enable a full understanding of impact and mitigation to be considered.

The upshot of this independent review is that more work needs to be undertaken to demonstrate that the impacts of the development can be mitigated and development meets national and local planning policy requirements. This relates to the following:

- i) In respect of the junction capacity assessments, this would involve providing validation of the 2018 base junction capacity predictions relating to queues, delays and ratio of flow to capacity (RFC). This could be achieved by providing the evidence that the predictions are reliable. If this can be undertaken, I can confirm that I have no objections to the conclusion's Stirling Maynard reach in their Transport Assessment.
- ii) No information has been submitted in respect of the type of traffic that might be associated with the primary school and whether the existing 5.5m wide carriageway on Beresford Road would be sufficient to accommodate the vehicle demands.
- iii) A Parking and Travel Plan for the primary school should be submitted setting out the likely cumulative car parking demands off-site and how this would be managed. The submission and agreement of the Parking and Travel Plan is considered to be essential in advance of the planning committee being invited to consider the application to ensure that planning committee members can make an informed decision.
- iv) Depending on the scope and content of the Parking and Travel Plan for the primary school, consideration should be given to how its outcomes, measures, and remedies are best secured through the planning process (i.e. S106 or planning condition).
- v) Auto tracking is required for Beresford Road and Lodge Close to demonstrate that these can function as the primary and emergency accesses. This analysis

should take into account the on-street parking likely to arise from the primary school.

I have considered the highway authority's recommended planning conditions and S106 obligation and agree with the inclusion of these in a planning consent subject to consideration being given to the matters raised above. Other conditions and S106 obligations may follow once consideration has been given to these matters. In addition, a planning consent should include condition requiring a Construction Management Plan.'

The Technical Note has been produced to provide as far as possible the additional information requested. Each of the points raised in the summary will be addressed in turn. It should be noted that, as previously stated, the review discusses a number of areas and queries a number of points. In producing this Technical Note it should not be assumed that all the points raised in the Review are accepted as correct, as we would take issue with some of these. However in the spirit of cooperation between applicant and Council rather than try to rebut these points of contention, the focus of this note is to try and provide where possible the additional information required to demonstrate that after further consideration an objection on highway grounds is not justified.

However, before getting into the detail, there is one point that needs to be raised and that is the status of the school site. The Highway Review raised what it calls a "fundamental issue" right at the start of the report. It actually states in the Executive Summary that:

"The introduction to the Transport Assessment (TA) produced by Stirling Maynard (SM) advises that '..... **The school does not form part of this application but is taken into account in this assessment for completeness.**' I have a fundamental issue with respect to this contention for two reasons. Firstly, the primary school is part of the outline planning application and secondly the submitted Transport Assessment and Framework Travel Plan have not taken into account the primary school in sufficient detail to enable a full understanding of impact and mitigation to be considered."

It is respectfully suggested that this statement is incorrect. The application results in the transfer of land to the County Council for a new primary school but does not seek actual planning permission for the school itself. This is confirmed in the committee report for the application. Under “2. Land of School Provision” it states:

“The application does not include proposals to build the school or provide moneys towards its construction.”

Further under “3. Access and Highway Considerations” it states:

“Although the school does not form part of the application itself, for completeness it rightly forms part of the scope of the transport assessment.”

(The emphasis is ours.)

The point here is that clearly the school needs to form part of the consideration of transport aspects of the proposal but the level of detail required at this stage is less detailed compared to what should rightly form part of a future reserved matters application or, more pertinently, a full application for the school. The relevance of this is discussed later in this report but in practice the school might be considered as committed development so it needs to be taken into account but it is not for the applicant to consider detailed aspects of the development for that site.

2.0 ADDITIONAL INFORMATION

In this section each of the items listed in the request for additional information are considered in turn.

2.1 Junction Capacity Assessment

Although not an actual part of the information requested the review does query some of the trip rates and trip generations used in the assessment. For completeness we have rerun the traffic assignment and capacity assessments using the Review traffic generation figures. Revised flow diagrams and a summary of junction performance are enclosed as Appendix 1 to this note. The key point here is that using the slightly higher traffic generations makes very little difference to the performance of the

junction with the key ratio of flow to capacity (RFC) statistics barely changing (in fact some don't change at all). For example the highest RFC at any junction (Hempstead Road / A418) changes from 0.59 to 0.60 and the mean maximum queue length is unchanged. (All RFC values are thus well below the theoretical capacity figure of 1.00 and the normal desirable maximum of 0.85). The conclusions in the Transport Assessment therefore remain the same.

The request for information does require validation of the base year junction assessment. The usual way of doing this is by undertaking queue length surveys and comparing those observed to those "forecast" in the model. (The review does mention delayed surveys but we have never before been asked for this level of detail at a single junction.) Unfortunately, it is not possible to undertake these at this time as it is the Christmas holiday period and traffic surveys at this time are not considered representative or valid.

In respect of the application and the junction models it is however suggested that the conclusions can be given some weight. There are a number of reasons for this:

- i) By general observation the key junctions modelled operate well within capacity consistent with the model results.
- ii) Norfolk County Council, who clearly would have knowledge of their own network, did not raise any issue with the junction modelling.
- iii) Assessments for previous major applications, although done before this application, consistently show there are no capacity issues on the local network.
- iv) The assessments show significant spare capacity at the junction so there would have to be something fundamentally wrong for them to actually be at capacity, (most RFCs would have to at least double to reach capacity). As has been shown, for example, increasing the development traffic has virtually no impact on the model outputs.
- v) Surveys of queues or delays at junctions which are operating below capacity are not particularly useful in any case for validation (apart from confirming the junctions are under capacity). They are more relevant for junctions operating

over capacity with significant queuing which can be more meaningfully matched with model outputs.

In addition there are aspects of the traffic forecast which would suggest these forecasts are “robust” giving further reassurance in the final conclusion. These include:

- i) Future background growth has been calculated using TEMPRO factors as is the normal approach. In addition some specific committed development has been taken into account. The TEMPRO factor has not been amended to reflect this so there is an element of double counting.
- ii) Since the analysis was undertaken the TEMPRO database has been updated and in fact the latest TEMPRO factors are slightly lower for this area.
- iii) Construction of the committed developments was underway at the time of the surveys so again there is an element of double counting.

Taking all these factors into account it is suggested that, even without the opportunity to undertake further surveys, the conclusions on junction performance are robust.

2.2 Beresford Road

The specific request is for information regarding traffic to and from the primary school and whether the 5.5 metre carriageway is wide enough to accommodate these vehicles. Notwithstanding previous comment on the status of the school some discussion is possible on this point. The Review’s own traffic generations show a total of 659 vehicle movements (two-way) over the day. Of these by far the majority will be staff and pupil drop-off trips. These will mainly occur during the morning peak hour, and the period after school finishes (typically around 15:30) but there will be some spread due to:

- i) Staff starting earlier and finishing later.
- ii) A spread of pupil trips due to breakfast clubs and after school clubs.

It is also relevant to note the commentary in the committee report on accessing a primary school site. It states:

“Considerations directly associated with accessing a primary school site

It is recognised that a school is a significant focus for vehicle movements associated with dropping children off in the morning and collecting them at the end of the school day and the implications of this needs careful consideration. The LEA have evidence that a large proportion of the pupils attending Holt Community Primary School at present reside in the area to the south of the A148 (Holt Bypass) and in relative close proximity to the application site, making it a realistic option for many pupils to attend school on foot. In addition a large proportion of the new housing currently under construction in Holt is located to the south of the A148.”

This would infer considerable scope to reduce these numbers.

Clearly those staff and pupil drop-offs who do come in vehicles will principally be cars. In addition, based on experience of a considerable number of primary school projects in recent years, our experience is that most servicing is done by vans, from small vans up to transit size. Very little if any is by HGVs. In addition these are managed to occur outside school start and finish times. The only large vehicle likely to serve the site will therefore be a refuse vehicle and in addition there will be the occasional coach for school trips.

Beresford Road is 5.5 metres wide. This is wide enough for two HGVs to pass each other (reference for example Manual for Streets Table 7.1) so clearly in terms of geometry it is comfortably wide enough to accommodate traffic flows which are predominately cars. Even if a car is parked on street, a car or HGV will be able to pass it. In addition the Review itself confirms that traffic volumes themselves are not at a level to cause an issue in terms of capacity and road safety.

The Review does refer to the impact of school car parking in this context but that impact is for consideration in deciding the school application as it is that application which should assess how parking will be controlled and any impact mitigated for example by appropriate markings. It is relevant to note in this context however that the County Council points to layby parking being supplied around the school so that

would remove the need to park in Beresford Road and also reduce any impact on road width.

In conclusion therefore, although a lot of journeys to and from school will be by the more sustainable modes, the traffic that is generated by the school would be almost completely car based. Projected levels of flow are well within the capacity of the road and the overall impact cannot be classed as “severe”.

2.3 School Travel and Parking Plan

Based on previous commentary it is firmly our view that these documents should form part of any application for the primary school and not part of this application. Apart from the fact that this application does not cover the school the Parking and Travel Plan can only be, and needs to be, developed as part of the planning for the layout of the school so one can influence the other. If we produce the Plans here we would potentially be proposing measures over which we have no control to implement and based on a lot of missing information. These are considerations for the school application in the knowledge that if these are not addressed the application will be refused.

It is however relevant to note that there was a considerable discussion with the County Council’s Education and Highways teams over the development and the submitted scheme shown on the Development Framework including the location of the school, the internal loop road and the layby parking was the result of an interactive process during those discussion. The details of this can of course be further discussed and confirmed in a future reserved matters application.

The commentary in the committee report on accessing the school confirms that the County Council have considered these matters in principle before deciding not to object to the scheme and they had significant input into deciding where on the site the school should be located.

No comment is offered here on planning conditions and S106.

2.4 AutoTracking

Attached as Appendix 2 are AutoTrack plots for:

- i) A fire tender entering and leaving the emergency access via Lodge Close.
- ii) A large refuse vehicle entering and leaving the site via Beresford Road.

In each case we have assessed a “worst case” in that we have included a significant number of parked cars on the approach roads but, as can be seen, the manoeuvres can be safely carried out. As informed above we don’t in practise anticipate this level of parking. It should also of course be noted that refuse vehicles will typically serve the site only twice a week (once for residential and once for school) and would normally not serve the school at peak times. The emergency access will hopefully never have to be used but would be an extreme event.

3.0 CONCLUSION

Following on from the comprehensive Review carried out by independent consultants this Technical Note has discussed the points reached and concludes that there are no material or “severe” highway impacts and the County Council was correct in not registering an objection.