

# **STATEMENT OF OBJECTION TO TRANSPORT ASSESSMENT**

**PREPARED FOR  
SAVE COFFERIDGE CLOSE  
BY**

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## Executive summary

This document evaluates the transport aspects of the planning application for a supermarket expansion at Cofferridge Close. It examines the content of the Transport Assessment<sup>1</sup> which forms part of the application, in relation to national and local planning policies and advice. It concludes that the application falls well short of policy requirements and should be refused. Additionally it identifies significant errors in the assessment and evaluation of the existing highway network.

### National Policy — NPPF — “Promoting sustainable transport”

Contrary to the title of Section 4 of the National Policy Planning Framework (NPPF), the application does not promote sustainable transport. In fact it contravenes several of the specific provisions of the NPPF, namely:

- paragraphs 17 and 58 — because it would abandon rather than promote mixed use, and would have a negative impact on patterns of movement throughout the town;
- paragraph 32 — because its Transport Assessment contains flawed evidence and analysis, and because access to the site would not be safe and suitable for all people;
- paragraph 35 — because it does not meet any of the six criteria for exploiting opportunities for the use of sustainable transport modes for the movement of goods or people;
- paragraphs 10 and 32 — because it fails to consider the specific context and the impact of its proposals;
- paragraphs 30 and 34 — because it would increase rather than reduce emissions and congestion;
- paragraph 36 — because it does not provide a Travel Plan or any through traffic or movement studies;
- paragraph 37 — because it would reduce the balance of land use, thereby increasing rather than minimising journey lengths and traffic; and
- paragraphs 39 and 40 — because it would reduce rather than improve the availability of town-centre parking in Cofferridge Close, with consequent negative impact on the quality of parking across the town.

Overall, the application is out-of-scale for the size of the town and its transport network and contrary to the express direction of the NPPF and its detailed provisions.

### Local Policy

The NPPF states that “*for 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted since 2004 even if there is a limited degree of conflict with this Framework.*”<sup>2</sup> And goes on to say that “***proposed development that conflicts [with Local Plan policy] should be refused***”.<sup>3</sup>

<sup>1</sup> WSP, *Land at Cofferridge Close, Stony Stratford: Highways, Traffic and Transportation Assessment* (January 2011, revised March 2011).

<sup>2</sup> NPPF, para. 214.

<sup>3</sup> NPPF, para. 12.

The application is in direct conflict with Local Plan policies:

- T1 — because it does not give priority to non-car modes;
- T6 — because it does not improve interchange between public transport and other modes of travel;
- T9 — because it ignores the road hierarchy; and
- T10 — because it would be likely to generate motor traffic exceeding the environmental capacity of the local road network.

**Policies T9 and T10 state that the application should, therefore, be refused.**

### Existing Conditions

The application assessment of existing conditions is based on a false premise. The assessment is based on the guidance of the Design Manual for Roads and Bridges<sup>4</sup> (DMRB), which was developed for Trunk Roads and should only be used for major roads. The appropriate guidance is contained in the Manual for Streets (MfS), which actually states that: ***“the DMRB is not an appropriate design standard for most streets”***<sup>5</sup> This erroneous focus means that the application assessment treats the local streets in Stony Stratford as movement corridors and ignores their function as places and it is that function which distinguishes a street from a road. The necessity for this approach is reinforced by the fact that the local network in Stony Stratford is subject to a 7.5 tonne weight restriction. By treating streets as roads the application ignores their function within the community and environment. Use of the MfS would militate strongly against the application.

In addition, the application ignores the way in which the local streets actually work, particularly the impact of on-street parking on movement and the way in which the network is used by pedestrians and cyclists. Applying the standards from the DMRB will inevitably increase traffic speeds on certain sections with a consequent reduction in safety standards for pedestrians and cyclists. This conflicts with the NPPF, which states: *“Planning policies and decisions ... should aim to achieve places which achieve and promote safe and accessible developments”*.<sup>6</sup>

This is compounded by errors in the assessment of individual streets, in particular the fact that on-street parking results in pinch points with informal single direction traffic flows, resulting in a very different picture of potential (and actual) congestion than that identified. Moreover, the application assessment ignores London Road, which will also be affected by the application.

### Conclusions

The application conflicts with both National and Local Planning Policy. It is based on the incorrect use of government guidelines and makes an incomplete and incorrect assessment of the nature and capacity of local streets. Therefore the application should be refused.

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<sup>4</sup> Department for Transport, *Design Manual for Roads and Bridges* (1992 with subsequent updating).

<sup>5</sup> Department for Transport and Department for Communities and Local Government, *Manual for Streets* (2007), paragraph 1.4.4.

<sup>6</sup> NPPF, paragraph 69.

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## 1.0 Introduction

- 1.1 The following paper considers the WSP Highways, Traffic and Transportation Assessment in the light of the actual situation in Stony Stratford, of the National Planning Policy Framework and other relevant national policy and of the Local Plan.

## 2.0 National Policy – NPPF

The National Planning Policy Framework (NPPF) came into force on 27<sup>th</sup> March 2012 in accordance with the statement that “the policies of this framework apply from the day of publication” and there are a number of elements of this document which impinge on the application. The introduction states that “*plans and decisions need to take local circumstances into account*”. The application ignores local circumstances in many ways and therefore conflicts with this basic tenet of national policy.

In addition the NPPF sets out 12 core principles. In order to accord with these principles the local authority should not be regarding this application process as a simple matter of “*scrutiny but as a creative exercise in finding ways to enhance and improve places in which people live their lives*” (para 17 NPPF). By removing facilities, parking provision, green space and a mix of job opportunities, this application is detracting from local amenity and detrimentally affecting the way in which people will be able to live their lives.

### 2.1 “Promoting sustainable transport”

- 2.1.1 Contrary to the title of Section 4 of the NPPF, the application does not promote sustainable transport. In fact it contravenes several of the specific provisions of the NPPF, as evidenced below. Overall, the application is out-of-scale for the size of the town and its transport network.

### 2.2 Mixed-use development and patterns of movement

- 2.2.1 Contrary to the core planning principles set out in paragraph 17 of the NPPF:
- the application does not “*promote mixed use developments and encourage multiple benefits from the use of urban land...*”. Indeed, by replacing a purpose-built and designed mixed-use development of offices, dental surgery, shops, small supermarket and public green space with a single large supermarket, it would eliminate the existing mix. This also brings the application into direct conflict with the aim, set out in paragraph 58 of the NPPF, that planning decisions should ensure that developments “*create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) ...*”.
  - the application does not “*actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable*”. On the contrary, in order to justify the change of use, it seeks to change traffic and pedestrian patterns in a manner detrimental to Cofferridge Close and to Stony Stratford in its entirety. In

order to accommodate their proposal, the applicants are seeking to alter the whole town by:

- privatising public highway, parking provision and public realm to give their operator complete control and discretion over what is currently a core parking facility for the whole town;
- removing long-term parking from the centre of the town, and replacing it with two-hour parking only, contrary to their own initial application and proposal;
- forcing residents and visitors alike to use long-term parking half a mile away down alleyways, thereby also depriving the sports clubs of their customary facility;
- depriving residents in Silver Street of their essential on-street parking and of the back-up facility of long-term parking in Cofferridge Close;
- re-designing junctions (notably London Road/Horsefair Green) to the detriment of pedestrian safety, whilst still failing to achieve the required adequate level of traffic throughput;
- quadrupling HGV movements through narrow streets; and
- making walking and cycling more difficult within this small market town, by treating its streets as if they were main roads, without consideration of the town’s “sense of place”. It incorrectly applies to these streets the standards of the Design Manual for Roads and Bridges and disregards the guidance given by the government in the Manual for Streets.

Further information on these points is presented in Appendices 1 to 5 below.

## 2.3 Transport Assessment

- 2.3.1 Paragraph 32 of the NPPF states that “*All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment.*” The Transport Assessment presented by the applicant is based on such flawed evidence and analysis that doubts must arise as to whether it has been “*properly prepared*” within the meaning of the official government guidance on such documents<sup>7</sup>

Deficiencies in the Transport Assessment are detailed in Appendix 3 below.

## 2.4 Sustainability – safety, access and facilities

- 2.4.1 Paragraph 32 of the NPPF also states that “*Plans and decisions should take account of whether:*
- *the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;*
  - *safe and suitable access to the site can be achieved for all people ...*”
- 2.4.2 The application concentrates upon vehicle traffic with little appreciation of the current significantly pedestrian-based use of Cofferridge Close, as a mixed-use resource primarily

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<sup>7</sup> Department for Transport and Department for Communities and Local Government, *Guidance on Transport Assessment* (2007), paragraph 1.18.



designed for and used by the town, unlike the High Street with its specialist shops and a correspondingly wider catchment (which also relies upon the mixed parking provision currently provided by the public facility of the Close).

2.4.3 “*Safe and suitable access to the site*” would not be achieved by the application because of its predominant consideration of vehicle traffic and of its inadequate consideration of access by other customary and regular users.

2.4.4 The application also conflicts with each of the six points covered in paragraph 35 of the NPPF: “*Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to:*

- *accommodate the efficient delivery of goods and supplies;”*

Efficient delivery of goods and supplies would be compromised by the volume traffic increase on the street network, congestion in peak hours and access through the Grade2 listed arch for a quadrupled number of HGV deliveries.

- *“give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;”*

The Transport Assessment gives no priority to pedestrians, cyclists or to public transport, in fact quite the contrary.

- *“create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;”*

The proposed much enlarged car park is the focus of attention in the Transport Assessment. The old established footpath network and access ways are paid lip-service. This application is about cars.

- *“incorporate facilities for charging plug-in and other ultra-low emission vehicles; ...”*

Minimum provision may be expected: the application is featureless for any provision other than the purely commercial, i.e. cram as many cars in to the site as possible.

- *“consider the needs of people with disabilities by all modes of transport.”*

Minimum standards are applied in the Transport Assessment, which bear no relation to the very high degree of accessibility, by a variety of routes, to the offices, surgery, shops and open space of the present Close. The application is a retrograde move for those with disability.

Further information on access is presented in Appendix 4 below.

## 2.5 Context and impact

2.5.1 The application pays little attention to the town as a whole or to the integrated nature of Cofferridge Close services and provision within the working and living town. Contrary to the statement in paragraph 10 of the NPPF that “*plans and decisions need to take local circumstances into account*”, the application ignores local circumstances in many ways. Such an appreciation is intrinsic to an understanding of the streets and their use and the delicate balance of custom and practice which has evolved.

2.5.2 The NPPF speaks to this also in paragraph 32: *“Plans and decisions should take account of whether:*

- *improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.”*

2.5.3 On the contrary, far from seeking to improve the transport network overall, the mitigation proposed by the applicants serves only their proposal.

2.5.4 The residual cumulative impact of the development would be severe upon the centre of the old town, upon its transport network and upon all other users, residents and visitors alike. This is because it is primarily predicated, commercially, upon significantly increased vehicle movement.

2.5.5 In both these respects, therefore, the application is in conflict with paragraph 32 of the NPPF.

## 2.6 Reducing emissions and congestion

2.6.1 The size of the supermarket and its commercial viability are predicated upon significantly increased traffic entering the town, which will inevitably increase gas emissions and congestion. This is contrary to paragraph 30 of the NPPF: *“Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.”*

2.6.2 Plenty of nearby supermarkets are readily available to residents of Stony Stratford and its immediate surrounding area, whether by car or by public transport. Need to travel is already minimised by the present small supermarket in Cofferridge Close, which meets their day-to-day needs, mostly without the use of motor transport. Replacing it with an unnecessary larger supermarket that merely duplicates other similar facilities nearby would do nothing to maximise the use of sustainable transport modes. The application therefore also offends paragraph 34 of the NPPF: *“Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.”*

## 2.7 Travel Plan

2.7.1 Paragraph 36 of the NPPF states that *“all developments which generate significant amounts of movement should be required to provide a Travel Plan.”*

2.7.2 Whilst it may be said that significant amounts of movement would not be generated as a result of the application, the impact of change of use — away from mixed use to a single supermarket with all the design change to the Close — will create a new situation which requires more careful study than the application has so far provided. There are no thorough traffic or movement studies provided, for example, either to justify the claims made in the application or to form the basis for a Travel Plan.

## 2.8 Balance of land use

- 2.8.1 Paragraph 37 of the NPPF calls for *“a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.”* The Local Plan reflects this, as will the Neighbourhood Plan for Stony Stratford, arrangements for which are now in hand by the Town Council.
- 2.8.2 The application would reduce employment in Cofferridge Close (indeed the offices are already emptied) and restrict the choice of shopping in the Close as well as in the High Street, given the size of the proposed supermarket. It has already closed educational provision with the departure of the very successful Adult Continuing Education centre. The closures have already created extra journeys and journey lengths in order that residents fulfill their needs. This is directly contrary to paragraph 37 of the NPPF.

## 2.9 Parking

- 2.9.1 Paragraph 39 of the NPPF states that: *“If setting local parking standards for residential and non-residential development, local planning authorities should take into account:*
- *the accessibility of the development;*
  - *the type, mix and use of development;*
  - *the availability of and opportunities for public transport;*
  - *local car ownership levels; and*
  - *an overall need to reduce the use of high-emission vehicles.”*
- 2.9.2 Paragraph 40 of the NPPF states that: *“Local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision for motorcycles. They should set appropriate parking charges that do not undermine the vitality of town centres. Parking enforcement should be proportionate.”*
- 2.9.3. Contrary to their own initial application (which proposed to extend the current 2-hour weekday short-stay parking limit in Cofferridge Close to a 3-hour limit, and to leave weekend short-stay parking unlimited), the applicants are now seeking to impose a 2-hour limit throughout the Close seven days a week (Saturdays and Sundays included), while abolishing the present 62 long-stay parking places. All parking in the Close would be placed under the “full control” of the store operator. It is also proposed to introduce double yellow lines in front of eight properties in Silver Street and three in Horsefair Green, and residents-only parking in front of three other properties on these streets. Those parking there at present would be expected to use long-stay car parks instead, notably Ostlers Lane (some 800 metres’ walk away on the other side of the town).
- 2.9.4 These proposals, far from improving the quality of parking in the town centre, would seriously reduce it for the reasons stated in Section 6.0 and Appendix 1 below. The application is therefore in conflict with paragraph 40 of the NPPF.

Further information on parking is presented in Appendix 1 below.

### 3.0 National policy — other aspects

3.1 The application is in conflict with other aspects of national policy as set out in the Transport Assessment<sup>8</sup>:

- *“The road network providing a more reliable, freer-flowing service”*. The current retail provision at Cofferridge Close optimises provision of a local service. The significant increase in demand resulting from the increase in floorspace will increase traffic flows for both cars and commercial vehicles on a road network ill equipped to cope with increases. The proposal does not meaningfully address the problem and only looks for the minimum action; i.e. re-routing HGVs via Church Street that the Transport Assessment considers the less unsatisfactory route, and making slight modifications to junctions on roads where major constraints result from the width of the road and on-street parking as well as the junctions.
- *“making walking and cycling a real alternative for trips”*. By increasing retail floor space to a level which will require significant increase in catchment area for economic viability the application will require a significant increase in the proportion of car-based trips and a consequent reduction in the proportion of walking and cycling trips.

*“The [government’s] strategy supports a multi-modal approach ...”* If anything the application militates against a multi-modal approach. Looking to a wider catchment area will inevitably mean a proportional increase in car trips.

3.2 Of the five key government objectives quoted by the Transport Assessment<sup>9</sup>, the proposal is in direct conflict with four!

1. By increasing traffic flows on narrow roads with a lot of on-street parking and significant pedestrian movements, road safety is jeopardised rather than improved.
2. The increased traffic flows will reduce capacity rather than increase it, particularly given the fact that the junctions around Horsefair Green will be operating close to absolute capacity, even after modifications to increase capacity.
3. There is no suggestion of a mechanism to improve traffic management.
4. The application does not manage demand for road use, it just proposes to increase it.

### 4.0 Milton Keynes and South Midlands Sub-Regional Strategy

4.1 As mentioned in the Transport Assessment<sup>10</sup>, the Strategy looks, amongst other things, to “meet existing infrastructure needs and provide for requirements generated by new development by investing in new and improved infrastructure, by planning to reduce the need to travel and by creating a shift to more sustainable modes of travel”. The application is not proposing any significant investment which will improve infrastructure provision. Indeed, the proposal increases the load on local infrastructure and, even by the applicant’s standards, at best only improves infrastructure to barely cope with new development.

<sup>8</sup> Transport Assessment, paras. 2.2.2 and 2.2.3.

<sup>9</sup> Transport Assessment, paragraph 2.2.4.

<sup>10</sup> Transport Assessment, paragraph 2.3.9.

## 5.0 Local policy

- 5.1 The NPPF states that: *“for 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted since 2004 even if there is a limited degree of conflict with this framework”*<sup>11</sup>. In addition, the NPPF states that *“proposed development that conflicts [with Local Plan policy] should be refused”*<sup>12</sup>, which strongly reinforces local policy.
- 5.2 One of the objectives of the Local Plan is *“to reduce the number, length and need to make journeys”*<sup>13</sup>. Because of the way Cofferridge Close sits within its catchment, any economic viability requirement to increase the catchment, as with this proposal, will inevitably lead to increasing the number and length of trips.
- 5.3 **Policy T1 of the Local Plan** states that *“Development proposals should meet the needs of transport users in the following order of priority:*
- (i) Pedestrians and those with impaired mobility
  - (ii) Cyclists
  - (iii) Users of public transport and taxis, and motorcyclists
  - (iv) Others”

The nature of the application does not give priority to walking, cycling and bus, because the current development already maximises these modes for the existing catchment and any additional catchment well beyond the range of the sustainable modes. In practice, the application gives priority to *“(iv) others”* because it treats car movement as sacrosanct to the extent that footway areas would be reduced in order to increase the capacity of road junctions, additional traffic would make road crossings for pedestrians more risky and more time consuming and some pedestrian routes would be removed.

- 5.3 **Local Plan policy T.6** states that *“development proposals in ....Town and District Centres ... should improve interchange between public transport and other modes of travel”*. **The application makes no effort to address this issue.**
- 5.4 **Local Plan policy T.9** states that *“the Council will promote a road hierarchy, comprising Primary Distributors, District Distributors, Local Distributors and Access Roads”, and that “planning permission will be refused for development if proposed highways do not comply with the Council’s Highway Design Guide”*. In Local Plan terms, the streets providing access to Cofferridge Close are Local Distributors as they provide access to Stony Stratford from the Milton Keynes main road network. Table T1 of the Local Plan Transport policies clearly sets out the policy requirements for local distributor roads, which are:
1. Discourage through and non-local motor traffic;
  2. Give priority to the needs of pedestrians and cyclists;
  3. Give priority to the needs of public transport;
  4. Introduce traffic calming measures.

<sup>11</sup> NPPF, paragraph 21.4.

<sup>12</sup> NPPF, paragraph 12.

<sup>13</sup> Local Plan, paragraph 7.6.

The application ignores all of these policy requirements and, by ignoring the nature and function of the streets surrounding Cofferridge Close, attempts to treat all the roads accessing the application site as District or even Primary Distributors. Quite clearly, **to accord with policy T9 the application should be refused.**

- 5.5. **Local Plan policy T.10** states that *“planning permission will be refused for development if it would be likely to generate motor traffic:*
- (i) *Exceeding the environmental capacity of the local road network; or*
  - (ii) *Causing significant disturbance, noise pollution or risk of accidents.”*

**Since the policy states that permission will be refused on the basis of likely traffic generation and since the application would exceed the environmental and highway capacity of the local road network and would increase the risk of accidents, it should be refused in accordance with the policy.**

## 6.0 Parking standards

- 6.1 This is more than a matter of simply applying parking standards. Paragraph 40 of the NPPF states that *“local authorities should seek to improve the quality of parking in town centres so that it is convenient”*. The proposal in fact makes town centre parking less convenient. It limits the time that users can park throughout the week, removing the unlimited parking currently within the site as well as at weekends. It also proposes to convert the public highway, which is the current status of the Cofferridge Close parking, to private parking. This is of serious detriment to residents whose properties back onto Cofferridge Close and to the two churches in a similar position. These properties gave up their right of access because of the creation of the public highway car park, which safeguarded their future parking provision. The overall impact would be to place a significant proportion of the parking provision in Stony Stratford under the control of a private landowner who can choose to limit the times that it is available, to charge for parking — which would have a detrimental impact on the viability of commercial activity in the town — and to restrict use of the parking spaces to specific users. All of which detracts from the amenity of residents, those who use the town’s facilities and commercial operators. In addition, Cofferridge Close provides parking for uses on the High Street frontage, which would either be removed or restricted by the proposal.
- 6.2 As well as the restrictions within Cofferridge Close, the proposal seeks to remove some of the on-street parking which currently serves the residential properties on Silver Street. This would be a significant reduction in amenity for those residents who rely on the on-street parking both for their own vehicles and for those of visitors. These terraced properties, whether 19C or 20C design, have no off-street parking provision of their own. Indeed the present layout of the Close included this provision, now proposed to be removed by the application. Furthermore, the application proposes Ostlers Lane as the alternative long-term car park, a walk of some half a mile across town and through alleys, not a convenient winter prospect for a resident, particularly the elderly and infirm.
- 6.3 In aggregate, the proposed conversion to private ownership with short stay parking from public provision of a mix of short- and long-stay spaces would unbalance the public

provision throughout the town. It would exacerbate the situation in surrounding streets and car parks, notably Market Square, Silver Street, Oxford Street and the residential streets opening off it. The mitigation proposed by the applicants, principally to use Ostlers Lane car park, would simply convert its existing use, mainly for the sports clubs, into general use, creating further overload and imbalance.

- 6.4 **The overall impact of the parking proposals would be a significant reduction in convenience, particularly, but not exclusively, for local residents, putting the proposal in direct contravention of the NPPF.**

Note: Supporting analysis of parking is presented in Appendix 1 below.

## 7.0 Public highway — forfeiture of rights and of public realm

- 7.1 The proposal to stop-up the public highway throughout the Close and hand it over to private ownership and control contravenes the basis upon which all properties with former ownership and/or right of access (that is, prior to the construction of Cofferridge Close) had those rights safeguarded. (See explanation in previous section). Additionally, the Close was designed as public space with roads, parking areas, green space and orchard intended as such. It is to the detriment of use by virtue of custom and practice and to the overall amenity that this be altered. **This aspect of the application contravenes the existing use rights, as protected by covenant, of the adjoining (previous) landowners and property owners and therefore the application should be refused.**

## 8.0 Existing conditions

### 8.1 Local highway network

- 8.1.1 In their assessment of the local highway network, WSP have chosen to refer to the Design Manual for Roads and Bridges (DMRB). This is a basic error. The DMRB was developed by the Department of Transport as guidance, in the first instance, for Trunk Roads and is only applicable to major roads. In particular, it is a document relating to links between places. The appropriate guidance is contained within the Manual for Streets (2007). Indeed the **Manual for Streets states: “the DMRB is not an appropriate design standard for most streets”**<sup>14</sup>. The appropriateness of defining the local road network in terms of streets is demonstrated by the fact that the whole of Stony Stratford is subject to a 7.5 tonne, access only, weight limit which amounts to a *de facto* policy to minimise the number of larger HGVs in the town.
- 8.1.2 It is surprising that WSP have chosen to ignore the explicit guidance given by the Manual for Streets, because they themselves wrote it. The Manual provides guidance for links and networks within places, stating that it *“focuses on lightly trafficked residential streets but many of its key principles may be applicable to other types of street, for example high streets”*.<sup>15</sup>

<sup>14</sup> *Manual for Streets*, paragraph 1.4.4.

<sup>15</sup> *Manual for Streets*, page 5.



- 8.1.3 The DMRB is based on the “movement function” whereas the Manual for Streets is based on the “place function”. According to the Manual for Streets : *“the place function is essentially what distinguishes a street from a road. It comes largely from creating a strong relationship between the street and the buildings and spaces that frame it.”*<sup>16</sup> This exactly defines the streets around Cofferridge Close, which have an integral function within the community. When referring to the “place function”, it goes on to say *“this approach allows designers to break away from previous hierarchy whereby street designs were only based on traffic considerations.”*<sup>17</sup> In other words the guidance is advising very strongly that traffic considerations should be of relatively low priority when considered against the sense of place and issues such as sustainability and community. Table 3.2 of the Manual sets out the User Hierarchy for streets in the following way *“Consider first: pedestrians, cyclists, public transport users. Consider last other motor traffic”*. The Manual reinforces this by stating that *“in many situations it will be possible to determine the place status of existing streets by consulting with the people living there. Such community consultation is encouraged.”*<sup>18</sup> No attempt has been made to pursue this approach, rather the intention has been to ride roughshod over the community view.
- 8.1.4 The entire thrust of WSP’s approach has been to consider only motorised traffic movements while disregarding the other functions of the streets around Cofferridge Close. The guidance given on this point by the Manual for Streets is explicit: *“Providing for movement along a street is vital, but it should not be considered independently of the street’s other functions. The need to cater for motor vehicles is well understood by transport planners, but the passage of people on foot and cycle has often been neglected. Walking and cycling are important modes of travel, offering a more sustainable alternative to the car, making a positive contribution to the overall character of a place, public health and to tackling climate change through reductions in carbon emissions.”*<sup>19</sup> This demonstrates that the existing functions of the streets should be maintained even if this militates against the proposed development.
- 8.1.5 While the Transport Assessment may be broadly correct in its description of the local highway network, its descriptions of the local roads choose to ignore certain factors, in particular on-street parking, which are crucial to the functioning of the network and also are vital to the functioning of this part of Stony Stratford as a predominantly residential area This is supported by the Manual for Streets: *“Movement and place considerations are important in determining the appropriate design speeds, speed limits and road geometry, etc., along with the level of adjacent development and traffic composition”*<sup>20</sup>.
- **Silver Street** — Has a considerable amount of on-street parking provision, which serves the mainly residential frontage. This on-street provision is vital since the residential properties have no possibility of off-street parking. The on-street parking means that Silver Street (together with the western arm of Horsefair Green) is restricted in width and at three points, particularly the one close to the junction with Calverton Road, the available carriageway width is such as to permit only one-way

<sup>16</sup> *Manual for Streets*, paragraph 2.3.2.

<sup>17</sup> *Manual for Streets*, paragraph 2.4.10.

<sup>18</sup> *Manual for Streets*, paragraph 2.4.11.

<sup>19</sup> *Manual for Streets*, paragraph 2.3.6.

<sup>20</sup> *Manual for Streets*, paragraph 2.4.14.



operation through most of the day, i.e. when the parking is occupied. From time to time this leads vehicles to mount the footway with its attendant safety hazards. There is a proposal to make the southern end of Silver Street one-way (northbound). While this may help to ease congestion problems at the Horsefair Green/Calverton Road junction it will increase traffic speeds on approach to the junction with the inevitable impact on highway safety, particularly given the use of the section of Silver Street/Horsefair Green by pedestrians crossing the road. This is treating this section of highway as a road in DMRB terms rather than a street.

Note: Further analysis of traffic management in Silver Street is presented in **Appendix 2** below.

- **Church Street** — The on-street parking can make turning to and from High Street difficult, particularly for HGVs and can result in one-way movement at times.
- **High Street** — The full length of the High Street has on-street parking, most of which is double sided. This significantly reduces the width available for moving traffic and, while there is adequate space for two cars to pass each other, the same cannot be said for HGVs. The greater the number of HGVs using the High Street, the greater the likelihood of traffic disruption. This on-street parking is essential for the continued successful functioning of Stony Stratford and therefore any reduction or anything which affects the convenient operation of the High Street should be resisted.
- **Horsefair Green** — The southern side of Horsefair Green has on-street parking for residents. Particularly at the eastern end width is so restricted as to permit the passage of only one direction movement at a time.
- **London Road** — The Assessment does not refer to London Road, which will inevitably have to carry additional traffic. As with the other main routes in Stony Stratford, London Road has a considerable amount of on-street parking on both sides of the road which severely reduces its ability to accommodate any significant increase in traffic flow.

Note: Full analysis underlying section 8.1 is presented in **Appendix 3** below.

## 8.2 Cofferridge Close

- 8.2.1 The Transport Assessment also ignores Cofferridge Close itself. Whilst it is appreciated that the access with its shortcomings exists, it must be noted that it is already under stress, particularly when used by service vehicles. The passage under the building is only about 5.7m wide between the pillars. Large vehicles cannot pass through this bottleneck while it is being used by other vehicles, which frequently holds up traffic using Silver Street. When entering Cofferridge Close from a Church Street approach (as proposed in the Assessment) large, particularly articulated, vehicles have to swing out across the opposing traffic flows again causing congestion. These manoeuvres have to take place at a point where sight lines, particularly to the south are extremely restricted. Visibility to the south is less than 20m and in normal circumstances when there are cars parked on Silver Street this is further reduced to 12m. To the north with parked cars visibility is limited to about 15m. This is well below standard and additional use by the largest HGVs will inevitably increase the accident potential. **Grade 2 listing of the archway, as part of 7-23 Silver Street, increases the need to manage loads through this entrance**

**carefully.** The present situation results in scrapes to the supporting pillars and occasional incidents of serious damage. The proposed quadrupling of HGV movements, including at peak hours, will only intensify the potential for serious damage to the fabric and to persons, pedestrians immediately adjacent and residents overhead.

Note: Further analysis is presented in **Appendix 3** below.

8.2.2 It should also be noted that Cofferridge Close itself is part of the local highway network since it is a public highway. The application proposes to remove Cofferridge Close from the public highway network.

8.2.3 **It is of note that the application, in trying to justify the imposition of additional traffic load onto a network already, because of restricted movements and junctions, at or near capacity, makes reference to the Design Manual for Roads and Bridges. This is the applicable document for major roads and is quoted presumably because it suits the applicants to justify their proposal by treating the road network in Stony Stratford as major roads. This is wholly inappropriate. The relevant government manual is the Manual for Streets (note here that we are talking about Silver Street, High Street, Church Street in the vernacular). Notably there is no reference to the provisions of this manual in the application. This alone renders the application deficient.**

### 8.3 Journeys on foot and cycle

8.3.1 The nature of the local highway and footpath network means that any increase in local traffic flows is likely to result in additional risks to road safety. Cyclists must approach Cofferridge Close along roads narrowed by on-street parking, putting them in direct conflict with motorised traffic. In addition, as the Assessment rightly highlights, many pedestrian movements are through side alleyways and along relatively narrow footways. The consequence of this is that there are significant cross-movements of pedestrians on the local road network. In addition many of these movements are between parked vehicles. All of this militates against pedestrian safety, which will be aggravated by the increase in vehicular movements resulting from the proposal.

8.3.2 Paragraph 69 of the NPPF states *"Planning policies and decisions ... should aim to achieve places which achieve and promote safe and accessible developments containing clear and legible pedestrian routes and high quality public space which encourage the active and continual use of public space"*. The application makes existing pedestrian routes less clear and closes off some of the options that currently exist. It also removes an important area of public space which is accessed by these routes, thereby removing a part of the chain of spaces linked by pedestrian routes within Stony Stratford.

### 8.4 Journeys by bus

8.4.1 The bus services do not directly serve Cofferridge Close, with the nearest stops being 125 metres from the Cofferridge Close shops and requiring shoppers to cross both the High Street and Wolverton Road. These two factors are likely to dissuade shoppers from using public transport and the application is therefore in conflict with NPPF policies on sustainability and local policy T1.

## 8.5 Personal injury accidents

8.5.1 The current accident record is relatively light, which can be attributed to the relatively light traffic flows on the local road network which significantly ameliorates the potential for conflict. This situation will be made worse by the increased traffic flows resulting from the proposed development. It is also clear from the type of accidents that have taken place that both pedestrians and cyclists are vulnerable, as described in Section 8.3 above. Most importantly, the nature of the streets around Cofferridge Close and the restrictions arising from the on-street parking results in very low traffic speeds, so low that accidents resulting in injury should not be expected either because traffic can stop or because any impact would be so slight as to minimise the likelihood of injury. In the light of current circumstances the occurrence of any injury accidents should be regarded seriously and anything likely to lead to higher risk, such as removal of on-street parking, avoided.

## 8.6 Summary

8.6.1 It is far from clear that the application is well positioned to facilitate the use of sustainable modes, indeed the opposite is more like the true story. The buses are some little distance from the proposed supermarket, which is significant for this type of shopping where a significant proportion of shoppers can be expected to be carrying fairly heavy loads.

8.6.2 By ignoring on-street parking and the multiplicity of pedestrian crossing points resulting from the number of alleyways etc. WSP are painting a very false picture of the proposal's fit with policies of both Milton Keynes Council and central and regional government.

## 9.0 Development proposals

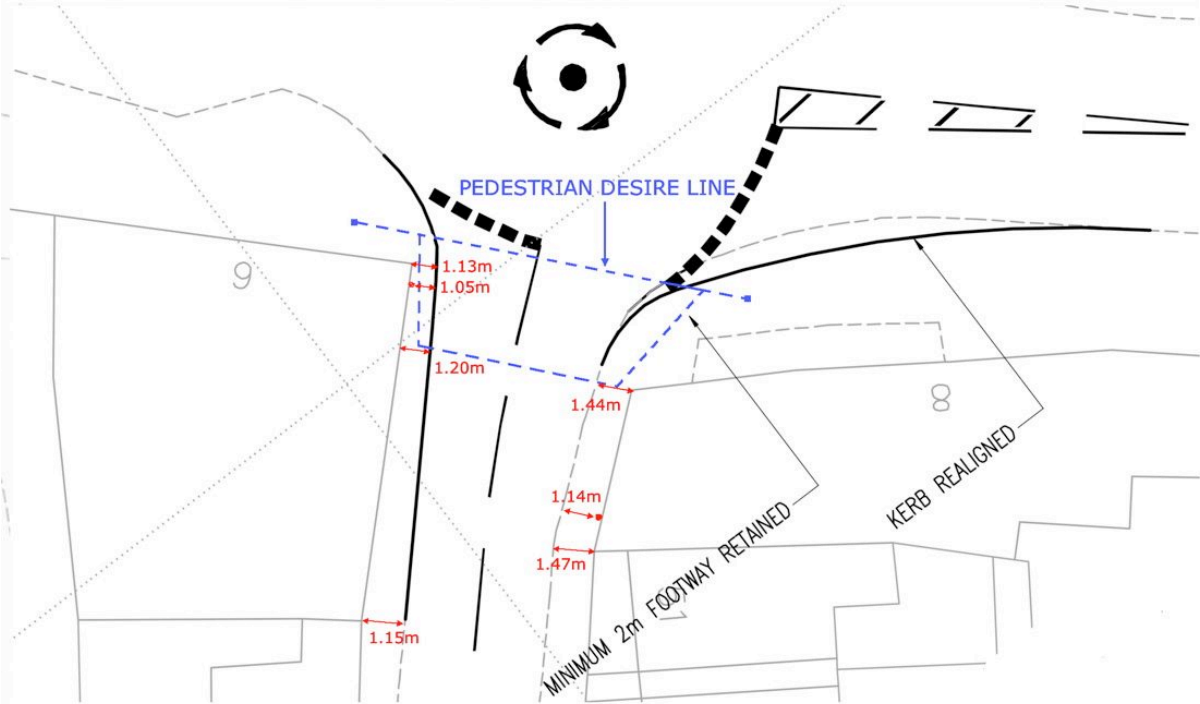
### 9.1 Existing and proposed uses

9.1.1 These two sections of the Transport Assessment show quite clearly that the proposal reduces the mix of development and thus contravenes both national and local policies. It is also against the advice of the Manual for Streets, which recommends diversity in the mix of developments being served by the streets.

### 9.2 Junction capacity assessments

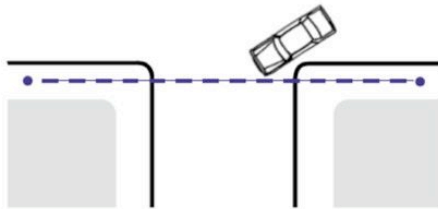
9.2.1 The junction capacity calculations show that the junctions are operating fairly close to capacity. This means that there is virtually no capacity to allow for any traffic growth beyond the opening date. This is an extremely risky strategy. In addition the applicants do not take into account the effective reduction in carriageway width resulting from the on-street parking. Even today the Silver Street/Calverton Road/Horsefair Green junction has queues of 5 or 6 vehicles and this situation will deteriorate rapidly with the increased traffic flows resulting from the proposed development. In other words the queuing will be far worse than the three vehicles predicted by WSP.

## LONDON ROAD/HORSEFAIR GREEN JUNCTION PROPOSED KERB REALIGNMENT (2140/SK/59 Rev B)



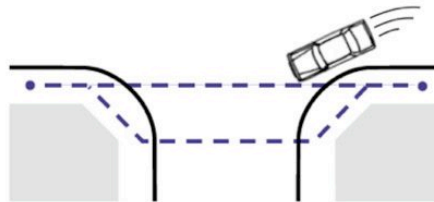
### MANUAL FOR STREETS, FIGURE 6.3

Small radius (eg. 1 metre)

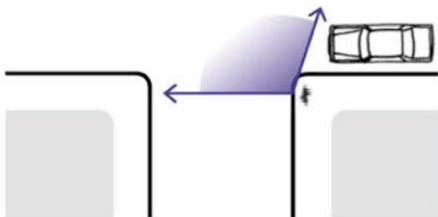


- Pedestrian desire line (---) is maintained.
- Vehicles turn slowly (10 mph – 15 mph).

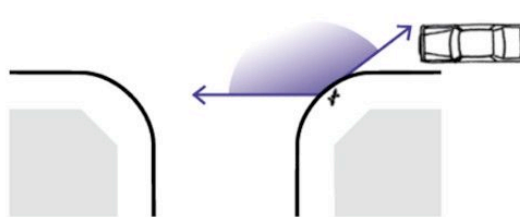
Large radius (eg. 7 metres)



- Pedestrian desire line deflected.
- Detour required to minimise crossing distance.
- Vehicles turn faster (20 mph – 30 mph).



- Pedestrian does not have to look further behind to check for turning vehicles.
- Pedestrian can easily establish priority because vehicles turn slowly.



- Pedestrian must look further behind to check for fast turning vehicles.
- Pedestrian cannot normally establish priority against fast turning vehicles.

Devon County Council

Figure 6.3 The effects of corner radii on pedestrians.

- 9.2.2 Table 6.1 of the Transport Assessment shows significant growth in traffic flows, particularly for Silver Street west of Calverton Road. This 36% increase is imposed on the network at the point where available capacity is most constricted by on-street parking and is likely to result in significant congestion at peak periods.
- 9.2.3 It must be said that this approach to assessing and modifying junctions is a function of the inappropriate use of the Design Manual for Roads and Bridges (rather than, that is, applying the Manual for Streets).

### 9.3 Junction re-alignment — pedestrian safety

- 9.3.1 Re-alignment is proposed of the London Road and Horsefair Green junction.
- 9.3.2 Objection is made to the whole length of the proposed realignment on the grounds that increasing the corner radius of the kerb at a street junction is contrary to the advice given in the Manual for Streets.
- 9.3.3 Specifically, paragraph 6.3.12 of the Manual for Streets says that:
- "Pedestrian desire lines should be kept as straight as possible at side-road junctions unless site-specific reasons preclude it. Small corner radii minimise the need for pedestrians to deviate from their desire line."
- 9.3.4 The diagram on the opposite page, reproducing the relevant part of 2140/SK/59 Rev B and of Figure 6.3 of the Manual for Streets, demonstrates that:
- The pedestrian desire line across the Horsefair Green arm of the junction would be deflected by the proposed realignment.
  - A detour would be required to minimise the crossing distance, forcing pedestrians to use footway whose width on both sides of the Horsefair Green arm is well below the Department for Transport's minimum acceptable standard of 1.5 metres, narrowing at one point to just 1.05 metres.
  - With the increased corner radius, vehicles turning from London Road into Horsefair Green would be travelling faster than with the present smaller corner radius.
  - With the increased corner radius, pedestrians crossing from the corner of 8 London Road would have to look further behind to check for fast turning vehicles coming from London Road.
  - Pedestrians in this situation cannot normally establish priority against fast turning vehicles.
- 9.3.5 The Horsefair Green arm of the junction is crossed daily by many pedestrians, including elderly and infirm people and schoolchildren, walking between their homes in London Road, Horsefair Green and Calverton Road (and the streets adjacent to all of these) and the town centre.
- 9.3.6 The wisdom of the advice given by the Manual for Streets can hardly be contested by WSP, since it was they who led the team of consultants who prepared the document for the Department for Transport and the Department for Communities and Local Government.

9.3.7 The proposed kerb re-alignment is intended to facilitate more and faster traffic through a junction already difficult for pedestrians. The proposed changes will not materially improve traffic flow and will endanger pedestrians and should be refused on that basis.

## 9.4 Service Vehicle Movements

9.4.1 In considering service vehicle movements the Transport Assessment has chosen to ignore the 7.5 tonne weight restriction which applies to all the streets accessing Cofferridge Close. While access is permitted for heavier vehicles this restriction does demonstrate a *de facto* policy to minimise the number of movements by larger vehicles. Since the application requires a significant increase in the number of HGV movements servicing the development compared with the present operation, the application runs counter to this *de facto* policy.

9.4.2 The Assessment states that: "*It is proposed that all delivery vehicles will be directed to and from the site via Silver Street from the west, which of the two alternatives routes is the best.*"<sup>21</sup> The implication of this is that neither alternative is really satisfactory. Even the route from the west is narrow and HGVs will have to negotiate tight turns and on-street parking, further restricting traffic flows and reducing capacity.

9.4.3 It should be borne in mind that the existing retail operation has chosen to access Cofferridge Close usually from Silver Street to the east. This suggests that the operator regards this as the most satisfactory routeing and that the alternative proposed by WSP may prove uneconomic or otherwise unsatisfactory. It is crucial to remember that the present supermarket requires two HGV deliveries per day, each arriving off-peak (early morning and mid-afternoon). The application envisages eight, without studying the result of this increase. If one anticipates a normal planning restriction on night-time deliveries because of the immediate proximity of housing, then by definition, delivery movements will occur in peak hours, which will bring the narrow streets to a standstill and introduce levels of queuing way in excess of that being predicted by the applicants and could result in major problems throughout the town, as occurs now on the rare occasion when there is a serious incident in the town.

9.4.4 The restriction in width resulting from on-street parking in the High Street will serve to impede the clear and free flow of delivery vehicles, which is likely to make this an unsatisfactory routeing strategy from the operator's point of view.

9.4.5 As with the earlier traffic predictions, no effort has been made to establish the actual HGV movements by survey. This means that the comparison with future HGV trip generation is inevitably flawed.

9.4.6 In fact, no detailed surveys or traffic counts have been conducted by the applicants under real conditions over a period of time. And, having emptied the offices of tenants, they have precluded the possibility so to do. The application figures for traffic represent essentially a desktop exercise which, at best, can only be regarded as an estimate or approximation with little or no resemblance to actual traffic conditions in and around the Close.

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<sup>21</sup> Transport Assessment, paragraph 5.6.3.

## 10.0 Environmental impact assessment

### 10.1 Listed building — the Arch — the only road entrance to Cofferridge Close

- 10.1.1 English Heritage announced, on 30<sup>th</sup> May 2012, a decision by the Minister for Tourism & Heritage to “add 7-23 Silver Street, *including the covered entrance to Cofferridge Close,*” [Author’s italics] to the List of Buildings of Special Architectural or Historic Interest; the buildings are now listed at Grade II”<sup>22</sup>.
- 10.1.2 The “covered entrance” (with dwellings overhead) or arch is supported by four brick-faced pillars, tightly positioned to the road. These pillars have, over time, been struck by vehicles and, clearly, are susceptible to such damage. About five years ago an HGV caused considerable collision damage to one pillar, requiring emergency bracing until full repair was completed.
- 10.1.3 The application requires a quadrupling of HGV movements to service the proposed supermarket with movements likely, for the first time, in peak hours. (Section 9.4 above refers), along with increased traffic flows in general, (Appendix 3 below refers)
- 10.1.4 Manoeuvring of large vehicles is already difficult (paragraph 8.2.1 above refers). It is difficult to see how the proposed increase in movements is compatible with protection of a listed structure.
- 10.1.5 Here we have a most cogent example of an application whose impact is out-of-scale to its environment in general and to key architectural features in particular, made manifest through inappropriate traffic movement.

### 10.2 Severance

- 10.2.1 The nature and essential character of Stony Stratford, with its numerous alleyways providing pedestrians with a multiplicity of routes which involve a considerable number of crossing points, make it unsuitable to be catered for by pedestrian crossings. Many of the crossing points are between parked vehicles, which has its dangers, particularly with increased traffic flows. However, the introduction of pedestrian crossings would reduce the amount of on-street parking significantly (by the imposition of zig-zag line zones). As has been said before this parking is of major importance in Stony Stratford where there is very little off-road parking available.
- 10.2.2 Silver Street around Horsefair Green, the part of the network that is predicted to suffer from the heaviest growth in traffic, is an area where there are particularly heavy cross-flows from pedestrians. The most significant part of these flows is from children, often accompanied by parents with other children in buggies, travelling to and from school. This large increase in traffic on Silver Street and around the Calverton Road junction would significantly increase the amount of time taken to achieve a safe crossing and would thus increase severance as well as having an impact on road safety.  
Note: Further analysis of severance (and of misrepresentation of evidence) is presented in **Appendix 3** below.

<sup>22</sup> Quotation from letter to the applicant for listing. Reference to English Heritage case no. 468471, Advice Report of 24<sup>th</sup> May 2012.



### 10.3 Pedestrian and cycle amenity

10.3.1 WSP believe that traffic growth between 18% and 36% would only have a slight negative impact on amenity. They ignore the fact that the vast majority of residential properties face directly onto comparatively narrow footways and are therefore close to the traffic. Such a pronounced increase would inevitably have a more major impact on amenity than they are suggesting, by virtue of noise and vibration as well as the visible perception gained from increased movement.

### 10.4 Accidents and safety

10.4.1 The examination of the accident record shows that, while there have not been an exceptional number of accidents, those that have occurred have been associated with the junctions most affected by increases in traffic resulting from the proposed development. Driver error has been identified as the cause of the accidents and, with the significant increases in traffic flows through these junctions, it is going to become more difficult for drivers to accurately assess the situation, particularly since there are a significant number of cycle and pedestrian movements associated with these parts of the network. This additional level of confusion is likely to result in additional accidents, particularly those involving pedestrians and cyclists.

10.4.2 As stated in paragraph 8.5.1 above, the nature of the streets around Cofferridge Close results in very low traffic speeds, which must lead to an expectation of a very low personal injury record. This suggests that the number identified as having occurred is more exceptional than the Transport Assessment suggests and that the proposed development is likely to exacerbate the situation.

### 10.5 Summary of environmental impacts

10.5.1 The Transport Assessment's claim that there would only be minor negative impacts is therefore strongly contested. The reasons set out above demonstrate that, at the very least the proposed development is likely to result in additional disruption for local residents, reduce the opportunities for pedestrians to cross the roads in safety and result in an increase in the number of accidents.

## 11.0 Conclusions

11.1 The proposals conflict with national regional and local planning policies across a wide range of transport policies which are intended to ensure the best working and improvement of the environment.

11.2 The proposals ignore the essential character of Stony Stratford and the way in which its movement patterns work. They also choose to ignore the fact that, not only is the local road network relatively narrow with tight turns but it is also lined with on-street parking which is essential for the residential properties throughout the town. This parking significantly reduces the capacity of the road network and means that any significant increase in traffic would be seriously detrimental to both the highway network and to the environment and amenities of a large part of the town.



- 11.3 In addition, to the detriment to the town, the difficulties with the highway network are such that potential users of this proposed large store would be deterred from using it, preferring to use other district centres with easier access, making it likely that the store would struggle to achieve economic viability. This would also have a detrimental effect on the convenience of accessibility to the town centre as a whole and could well act to the detriment of other High Street businesses. This is in direct conflict both with the interests of the town and with current government policy and initiatives. The restrictions affecting the free flow of delivery vehicles could also affect the functionality of the proposed unit and therefore its economic viability.

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## APPENDICES

*The assistance of Angela Cook and Edward Hudson in preparing the material presented in the Appendices is gratefully acknowledged.*

### APPENDIX 1 — PARKING

*(Reference: Section 6.0 above)*

#### A1.1 Applicant's proposal

A.1.1 In August 2011 WSP submitted a new amendment to their proposals on parking: <http://edrms.milton-keynes.gov.uk/AnitePublicDocs/00091812.pdf>

A1.1.2 Key points are:

- a 2-hour parking restriction seven days a week is now proposed throughout Cofferridge Close, (with the loss of all long-stay places and of the present unrestricted use of the whole car park on Saturdays and Sundays). This replaces an earlier proposal for a 3-hour parking restriction, which had been presented as a great benefit to the town;
- it is proposed to introduce double yellow lines in front of 25-39 Silver St and 22-24 Horsefair Green, and residents-only parking in front of 41-43 Silver St and 21 Horsefair Green;
- in support of these proposals, WSP have produced an analysis of parking in Cofferridge Close and along Silver Street, broken down by time of day and duration of stay;
- a substantial proportion of those parking at present in Cofferridge Close and Silver Street would be expected to use long-stay car-parks instead (including Ostlers Lane, some considerable distance away).

#### A1.2. Impact on Cofferridge Close

A1.2.1 Even accepting the trip generation (TRICS©) calculations, the net effect of this proposal would be to reduce the availability of non-food-store-related 2-hour public parking from 59 spaces at present to a minimum of 35 spaces (weekday peak) and 22 spaces (Saturday peak), while of course abolishing the present 62 long-term spaces altogether.

A1.2.2 The TRICS calculations are, however, highly unlikely to give a reliable forecast of parking requirements (let alone an hour-by-hour one), partly because WSP has consistently failed to appreciate that the vast majority of the users of the present short-term spaces are parking for general town purposes other than shopping at Budgens and that this continuing demand must therefore be added to the trip-generation forecasts for the proposed store, and partly because the sites selected to calibrate the TRICS model are so completely different from Cofferridge Close (in terms of size, character, opening hours, demographics of catchment area, accessibility on foot and availability of a filling station etc) as to be wholly unrepresentative. Any forecasts on this basis must have a very wide margin of error. To attempt then to derive hourly arrivals and departures of vehicles is even more hazardous.

- A1.2.3 Extending the 2-hour restriction to Saturdays and Sundays as proposed would severely hamper many vital Stony Stratford activities (prolonged Saturday-morning shopping along the High Street and in the market, weekend attendance at cultural, social and sporting events and at places of worship).
- A1.2.4 Forcing drivers to move out after 2 hours instead of the previously proposed 3 hours would increase the traffic in and out of the Silver Street archway by 50% (on top of the existing forecasts).
- A1.2.5 Limited availability of non-store-related parking would cause many fruitless entries to and departures from Cofferridge Close when drivers fail to find space available there, increasing traffic and on-street parking elsewhere in the town.
- A1.2.6 No details are given of the "control" the store operator would have over the car-park (free parking time proportional to amount spent in store, as in some other locations?).

### **A1.3 Impact on Silver Street, surrounding streets, car parks and the town**

- A1.3.1 WSP have totally disregarded overnight parking ("*vehicles which arrived after 17.00 have not been included ...*"). Yet another example of the failure of the applicants to see Cofferridge Close as anything other than a commercial enterprise and to take account of the needs of the surrounding residential properties. Had a night-time parking survey been carried out, it would have shown that residents need every space available for overnight on-street parking.
- A1.3.2 The net effect of the latest proposal would be to remove about 10 on-street parking spaces from Silver Street and Horsefair Green, and to convert 3 others into residents-only parking spaces. WSP are totally detached from reality if they think that Silver Street residents are going to park overnight in Ostlers Lane. They should consider whether anyone (especially a woman) would care to walk, carrying shopping, from Ostlers Lane to Silver Street late on a cold wet November night and to walk back again, before work, early the following morning.
- A1.3.3 The practical result of the proposal would be that thirteen Silver Street households (generously provided with residents' parking permits but with only 3 reserved parking spaces for all of them) would have to roam the surrounding streets in search of a place to park, especially overnight. Amongst other effects, this would place even greater strain on the reserved parking spaces on Horsefair Green, already fully used overnight and on other streets, notably Market Square. Here there are spaces for residents, for the disabled and for general use, already overloaded with regular parking on pavements. This pressure on space is a perfect example of the current situation throughout the town. The proposed conversion of public short- and long-stay parking in Cofferridge Close into private ownership of only short stay provision will unbalance the situation throughout the town and, in particular, existing pressure points like Market Square.
- A1.3.4 By removing the traffic-calming effect of on-street parking at the southern end of Silver Street, the proposal would increase the risk of collisions at the Cofferridge Close/Silver Street junction. The leftward visibility splay for a driver leaving Cofferridge Close is restricted by the projecting building line of 25 Silver Street. When the calculation is made, the "stopping sight distance" for a driver travelling along Silver St from Horsefair

Green towards the Cofferridge Close junction is shown to be only 28.6 metres, corresponding to a speed of about 23 mph. In other words, if a northbound vehicle on Silver Street is approaching the junction at more than 23 mph at the same time as a vehicle is pulling out from Cofferridge Close, the drivers cannot see each other until it is too late for the driver of the first vehicle to pull up and avoid a collision. Conclusion: if parking is removed at the southern end of Silver Street, a 20 mph speed limit along this part of Silver Street is essential, with traffic-calming measures to ensure that it is respected. This would be even more vital if the "Duffill" proposal to make this part of Silver Street one-way from Horsefair Green were adopted. It is simply staggering that WSP, authors of the clear explanation of visibility splays in the Manual for Streets, have failed to make this simple routine calculation — another example of their blinkered approach.

A1.3.5 The resultant higher speeds along Silver Street would significantly increase the danger of crossing the road at the Horsefair Green end of the street. Not only is this a natural crossing-point for residents of Ousebank Way and the west side of Calverton Road walking to and from town centre and Cofferridge Close, but it is an unavoidable one for those in wheelchairs and those pushing buggies etc., due to the substandard width of the pavement along the west side of Silver Street.

## A1.4 Conclusions

A1.4.1 The applicant's revised parking proposals remove all credibility from the application. Three-hour parking was the main argument clung to by those who hoped that the proposed store would increase footfall in the High Street. It is now blatantly obvious that the aim is to grab the town's main free central car-park for the commercial benefit of a store operator whose only purpose is to extract as much profit as he can from his customers and then push them out of the car park to make room for the next, without giving them any more time than at present to visit the town's other shops. It would suck the life-blood out of this town. As for the proposal to extend the 2-hour limit to weekends, it is an outright attack on the social and spiritual life of the town.

A1.4.2 The proposal to deprive many Silver Street residents of the overnight on-street parking on the basis of which they bought their properties, and to tell them that they can park 800 metres away instead while the Cofferridge Close car-park is completely unused at night, is nothing short of outrageous. At the very least, they should be offered parking permits to allow them to park (without time restriction and at any time of the day or night) in Cofferridge Close.

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## APPENDIX 2 — TRAFFIC MANAGEMENT IN SILVER STREET AND ADJACENT AREAS

*(Reference: paragraph 8.1.5 above)*

- A2.1 Following on from Richard Duffill's presentation to the Full Stony Stratford Town Council Meeting (November 2011) regarding the proposed partial one-way system in Silver Street, consideration has been given to the traffic flow figures, both with and without the Cofferridge Close development, if this traffic plan goes ahead.
- A2.2 At the last traffic count carried out in Silver Street by MKC (some 3 years ago), the combined flow in both directions was 6,108 vehicles a day. This is the flow of traffic on the section from the Cofferridge Close entrance north towards Market Square and Church Street. The narrower section of Silver Street that is proposed for one way already has a slightly lower traffic flow of 5,653 vehicles daily.
- A2.3 At the meeting, Richard Duffill stated that, with the proposed partial one-way system in Silver Street, traffic flow in the part of the Street that would remain two-way would increase by 2,000 vehicles a day. That makes a total of 8,108 vehicles daily, not taking into account the proposed development of Cofferridge Close.
- A2.4 The WSP Traffic Assessment for the supermarket planning proposal projects a 39% increase in traffic along Silver Street by 2016. Based on current flow this equates to an increase to 8,490 vehicles a day travelling up and down this section of Silver Street.
- A2.5 If you then calculate traffic flow with the partial one-way system in place and the supermarket operational, the projected 2016 traffic flow in this two-way section of Silver Street increases to 11,270 vehicles a day. This is not far off a 100% increase in what we have in Silver Street at the present time and would impact also on residents in Market Square and Church Street.
- A2.6 It would seem that the MKC traffic management plan for Silver Street is ill thought-out and just puts intolerable traffic pressure on other sections of street in the Town Centre. It is also surprising that this proposal was presented to the Town Council Meeting without reference to the traffic impact arising from the possibility of a major development in Cofferridge Close.
- A2.7 At the very least, the traffic issues in the town should be resolved in a fairer way that acknowledges the fact that streets on either side of the High Street are predominantly residential.
-

## APPENDIX 3 — DEFICIENCIES IN THE TRANSPORT ASSESSMENT

*(Reference: Section 8.1 above).*

### A3.1 Summary

A3.1.1 The Transport Assessment adopts throughout an inappropriate vehicle-based approach, not the pedestrian-based one necessary for a small market town. It erroneously treats the highways surrounding the site as roads serving the needs of motor traffic, not as streets in a built-up area serving the needs of pedestrians and fulfilling the sense of place that is fundamental to Stony Stratford.

A3.1.2 This wrong approach causes it to:

- seriously understate the true impact of the proposed development on traffic volume;
- fail to give proper consideration to the needs of pedestrians in general and of vulnerable groups in particular in the surrounding streets;
- make inappropriate and distorted use of regulatory material designed for trunk roads, while disregarding completely the more appropriate guidance given in the Manual for Streets, authored for the Departments for Transport and for Communities and Local Government by the same consultancy that has produced the Transport Assessment;
- fail to appreciate the impact of the extra traffic on pedestrian amenity in the surrounding streets; and
- seriously underestimate the difficulty experienced by pedestrians and especially by vulnerable groups in crossing the surrounding streets now and in 2016 with the extra traffic generated.

A3.1.3 The Transport Assessment also:

- fails to take proper account of the environmental impact of a fourfold increase in HGV traffic, operated throughout the day, on narrow streets lined with ancient listed buildings;
- fails to recognise the dangerous limited driver visibility at the sole access to the site, the narrow archway from Silver Street; and
- fails to demonstrate that the surrounding junctions could cope even with the extra traffic that has been forecast without compromising pedestrian safety.

A3.1.4 On multiple counts, therefore, the Transport Assessment's conclusion of insignificant traffic impact is fundamentally flawed.

These points are amplified and documented below.

## A3.2 Deficiencies in the Transport Assessment

### A3.2.1 Trip generation and traffic forecasts

A3.2.1.1 In estimating the vehicle traffic generated by the present store, Chapter 4 of the Transport Assessment fails to appreciate that:

- The vast majority of the present store's customers arrive on foot, not by car. The whole town is within easy walking distance of Cofferridge Close and a high proportion of its population is comprised of elderly and non- car-owning residents<sup>23</sup> (note1); and
- Cofferridge Close serves mainly as a general-purpose town-centre car park. Relatively few of the motorists using the car park are shopping in the present store.

A3.2.1.2 Instead, the Transport Assessment calibrates its car trip-generation model on a mix of sites elsewhere without presenting any evidence of comparability with Stony Stratford (location, demographics ...) or of correlation within the mix.

A3.2.1.3 As regards comparability, analysis of the eight sites chosen to calculate Saturday trip rates<sup>24</sup> shows that:

- The average gross floor area of the eight sites (4,218 sq. m.) is more than four times greater than that of the present Cofferridge Close store (1,024 sq.m.). They include five superstores (average floor area 5,781 sq. m.), all with petrol filling-stations and extended opening hours.
- The urban areas forming part of the catchment area of these sites are, on average, many times bigger than the civil parish of Stony Stratford<sup>25</sup>.
- Two of these sites are close to centres of economic activity attracting the temporary presence of substantial extra population not reflected in residential census data: one is close to Luton airport, which employs many thousands of staff; and another, Broadstairs, is surrounded by seaside resorts and language schools which seasonally attract large numbers of holidaymakers and foreign students.
- Most of the sites are close to main arterial road junctions, offering substantial pass-by and diverted traffic. None has such restricted access through narrow streets in a built-up area as Cofferridge Close.

<sup>23</sup> Percentage of population aged 65 and over: Stony Stratford 13.4%, rest of Milton Keynes 10.1%. Percentage of all-pensioner households: Stony Stratford 20.7%, rest of Milton Keynes 15.6%. Percentage of households without car or van: Stony Stratford 21.1%, rest of Milton Keynes 19.2%. (Source: Office for National Statistics, 2001 census data, parish profiles).

<sup>24</sup> District Centre, Luton, Beds (4,045 sq. m.); Local Shops, Uckfield, E. Sussex (676 sq. m.); Local Shops, St Albans, Herts (1,120 sq. m.); Safeway, High Wycombe, Bucks (5,800 sq. m.); Sainsburys, Winchester, Hants (6,800 sq.m); Tesco, Maidstone, Kent (6,038 sq. m.); Sainsburys, Broadstairs, Kent (4,830 sq.m.); Safeway, Gravesend, Kent (5,439 sq. m.). (Source: Transport Assessment, Appendix E).

<sup>25</sup> Population: Luton 184,390; Uckfield 13,697; St Albans 64,038; High Wycombe 92,300; Winchester 41,420; Maidstone 75,070; Broadstairs 24,370; Gravesend 95,717. Average (8 towns): 73,875. Population of Stony Stratford (CP): 7,566. (Source: Office for National Statistics, 2001 census data).

A3.2.1.4 As regards correlation, the mix of eight sites comprises five superstores and three sets of local shops. As the latter group includes take-aways, its daily and hourly trip distribution pattern is substantially different from that of the superstores.

A3.2.1.5 The eight sites chosen to calculate weekday trip rates are similarly flawed. Moreover, the weekday calculations are based on surveys conducted solely on Tuesdays, Wednesdays and Thursdays. The Friday evening peak, which is the busiest weekday time for food retailers, is thus omitted completely.

A3.2.1.6 This has the effect of:

- vastly overstating the number of vehicle trips generated by the existing store now and in 2016;
- vastly understating the difference between the existing-development traffic and the proposed-development traffic in 2016 (note4); and thus
- vastly understating the true impact of the proposed development on traffic volume.


A3.2.1.4 For this reason, the “net difference” percentage increases in 2016 traffic advanced in the Transport Assessment (Silver Street +36%, Horsefair Green +18%, Church Street +17%)<sup>26</sup> are ill-founded. Even the total percentage increases over existing 2011 traffic levels, while nearer the truth, are underestimates:

Silver Street	+49%
Horsefair Green	+32%
Church Street	+31%

**A3.2.2. Assessment of environmental impact**

A3.2.2.1 Chapter 6 of the Transport Assessment fails to deal adequately with the impact of such major traffic increases on the surrounding highways because it persistently considers them as roads and not as streets in a built-up area. It wholly overlooks the pedestrian dimension that should be the first priority in considering streets. In particular:

- It fails to give priority consideration to the needs of pedestrians, as recommended by the user hierarchy set forth in the Manual for Streets<sup>27</sup>:

User hierarchy	
<p><b>Consider first</b></p>  <p><b>Consider last</b></p>	Pedestrians
	Cyclists
	Public transport users
	Specialist service vehicles (e.g. emergency services, waste, etc.)
	Other motor traffic

<sup>26</sup> Transport Assessment, Table 6.1.

<sup>27</sup> Manual for Streets, Table 3.2.



- It fails to make an assessment of the available capacity of the existing cycleway and footpath network in the area of the development, as recommended by government guidelines on transport assessment<sup>28</sup>. In particular, a survey of footway widths in the surrounding streets would have revealed the presence of much below-acceptable-width footway, especially immediately opposite the sole vehicle access to the site.
- It fails to identify the presence of vulnerable groups (the aged, disabled and children) as recommended, even for trunk roads, by the Design Manual for Roads and Bridges.<sup>29</sup> In particular, reference to demographic data would have revealed the presence in Stony Stratford of much higher proportions of elderly people, of all-pensioner households and of households without a car than in the rest of Milton Keynes.<sup>30</sup>
- It fails to establish the travel patterns of such vulnerable groups, to take account of disruption caused to them and to pay particular attention to routes and facilities used by them as recommended, even for trunk roads, by the DMRB.<sup>31</sup>

A3.2.2.2 Instead, it purports to use material drawn from the DMRB as the sole basis for assessing community severance (i.e. the difficulty pedestrians experience in crossing a highway). Such use:

- is unauthorized. Intended for trunk roads, the DMRB may be applied in part to other roads only if they have similar characteristics and only to the extent deemed appropriate by the local highway authority.<sup>32</sup> No such decision has been taken by Milton Keynes Council as the local highway authority, and the streets round Cofferridge Close bear no similarity to trunk roads.
- has been deemed by the Senior Engineer at Milton Keynes Highways Development Control to be inappropriate for “the fine-grain development that Stony Stratford presents.”<sup>33</sup>
- conflicts with the advice of the *Manual for Streets* — produced for the Ministry for Transport by a team led by the same consultancy that has written the Transport Assessment — that “The DMRB is not an appropriate design standard for most streets, particularly those in lightly-trafficked residential and mixed-use areas.”<sup>34</sup>
- fails to take account of the needs of vulnerable groups of pedestrians, contrary to the recommendation of the DMRB that, even on trunk roads, severance in such cases should be assessed independently of any quantitative thresholds<sup>35</sup>.

<sup>28</sup> Department for Transport and Department for Communities and Local Government, *Guidance on Transport Assessment* (2007), para. 4.14.

<sup>29</sup> *Design Manual for Roads and Bridges*, Vol 11, Section 3, Part 8 (Pedestrians, Cyclists, Equestrians and Community Effects), Chapters 2 to 6.

<sup>30</sup> See note 23 above.

<sup>31</sup> *Design Manual for Roads and Bridges*, Vol 11, Section 3, Part 8, Chapter 5, para. 5.4.

<sup>32</sup> *Design Manual for Roads and Bridges*, Vol 0, Section 1, Part 2, Chapter 1, para. 1.5.

<sup>33</sup> Highway Observations for 11/00143/FUL (18/3/2011).

<sup>34</sup> *Manual for Streets*, para. 1.4.4.

<sup>35</sup> *Design Manual for Roads and Bridges*, Vol 11, Section 3, Part 8, Chapter 6, para. 6.1.b) and description of ‘Moderate’ severance.

- reduces the assessment of community severance to a mechanistic correlation to traffic levels, despite the DMRB’s warning that, even on trunk roads, “the correlation between the degree of severance and the physical barrier of the road and its traffic is not straightforward.”<sup>36</sup>

A3.2.2.3 Moreover, several parts of the Transport Assessment so seriously misrepresent the content of official government publications as to call the credibility of the whole document into question:

- In Table 6.2, claimed to be drawn from the DMRB, the Transport Assessment alters the nomenclature of severance levels given in the DMRB in such a way as to imply that “slight” and “moderate” levels of severance are not significant, which is not the meaning of the DMRB<sup>37</sup>.
- Table 6.3, which is claimed to be drawn from the DMRB, is a complete fabrication by the authors of the Transport Assessment. No such quantitative guidance on the “level of relief of severance that may be afforded by pedestrian crossings” is given anywhere in the DMRB.<sup>38</sup>
- The scale shown on the accident map in Figure 4, based on the Ordnance Survey, is false. Accidents 2 and 3 are made to appear some 250 metres apart, in support of a conclusion that the accident record does not show clustering.<sup>39</sup> In reality, they are less than 50 metres apart, clustered in immediate proximity to the site access, and are thus directly relevant to the application.

A3.2.2.4 Due to these faults in methodology, the Transport Assessment fails to consider the significant impact of major traffic increases on streets that are:

- narrow (roadway width reduced to 5.2 metres<sup>40</sup> on Silver Street, to 5.4 metres<sup>41</sup> on Horsefair Green, and to 5.6 metres<sup>42</sup> on Church Street) and further constricted to single-lane in some places by essential on-street parking;
- already heavily congested at peak times;
- already struggling to cope throughout the day with the major increase in northbound traffic generated by the introduction of the southbound one-way system on the High Street, for which no traffic management system has been introduced on these streets;
- lacking in amenity for pedestrians, especially the elderly, the infirm and children, due to extensive lengths of restricted-width footway, especially on Silver Street opposite the site access (footway width reduced to 70 centimetres<sup>43</sup> on Silver

<sup>36</sup> *Design Manual for Roads and Bridges*, Vol 11, Section 3, Part 8, Chapter 5, para. 5.2.

<sup>37</sup> The name of the highest level of severance is altered from “severe” (DMRB) to “significant” (Transport Assessment). As a similar alteration has been made in compiling Table 6.3 from other, unrelated, material in the Design Manual for Roads and Bridges, the distortion appears to be deliberate.

<sup>38</sup> These and other discrepancies with the DMRB were fully documented in a note filed with the Case Officer on 21/4/2011 (reproduced in Appendix 5 below).

<sup>39</sup> Transport Assessment, para. 3.7.2.

<sup>40</sup> Roadway width opposite 37 Silver Street.

<sup>41</sup> Roadway width opposite 50 Horsefair Green.

<sup>42</sup> Roadway width opposite 38 Church Street.

<sup>43</sup> Footway width at road sign near corner of Burnham House.

Street) and at both ends of Horsefair Green (footway width reduced to 105 centimetres<sup>44</sup> on Horsefair Green);

- crossed by several heavily-used pedestrian desire lines, because these streets separate extensive residential areas from the town centre (shops, schools, health centre, dentist, churches ...) and from recreational open spaces (Horsefair Green, Oxford Street playground, Mill Field playground ...);
- dangerous to cross, especially for the elderly, the infirm and children, due to lack of any pedestrian crossing (except on Silver Street) or traffic-calming system on any of these streets; and
- lined with residential properties, many of them ancient listed buildings, mostly fronting directly to the pavement and therefore vulnerable to increases in noise, vibration and gaseous emissions.

A3.2.2.5 The Transport Assessment also fails to consider the true effect on the surrounding streets of the fourfold increase it is forecasting in the number of goods vehicle movements required to serve the proposed store (8 HGV arrivals and 8 departures per day<sup>45</sup>, using articulated vehicles up to the legal maximum length of 16.5 metres, as compared with the 2 arrivals and 2 departures a day required by the present store, all with vehicles shorter than the legal maximum).

A3.2.2.6 In particular, it fails to consider that:

- due to the limitations of the proposed unloading bay and the handling time required, these HGV movements would have to be staggered throughout the day, with one arrival and one departure scheduled in the morning peak<sup>46</sup>. (In contrast, all the present HGV movements take place early or late in the day, outside peak hours, when their effect on other traffic is minimal);
- due to the limitations of the sole vehicle access to the site — the restricted archway on Silver Street — all other traffic in Silver Street and under the archway has to give way to HGVs entering or leaving the site;
- due to lack of visibility at the Silver Street/Cofferidge Close junction, articulated HGVs approaching from the west have to pull across to the far side of Silver Street before starting to turn through the archway, thus blocking all other traffic on that street<sup>47</sup>;
- due to the restricted archway width, errors of judgement on the part of HGV drivers making this hazardous turn frequently result in damage both to the pillars of the archway and to vehicles in Silver Street;

<sup>44</sup> Footway width at side of 6 London Road.

<sup>45</sup> Transport Assessment, Table 5.15.

<sup>46</sup> Transport Assessment, Table 5.15.

<sup>47</sup> The swept-path diagram for a maximum legal articulated vehicle entering the site, shown in the Transport Assessment (2140/ATR/019) is totally unrealistic. It shows the vehicle starting the manoeuvre from a point barely across the centre line of Silver Street where the turn is partly blind, and scraping the second pillar on the offside as it passes under the arch. In reality, all articulated vehicles making this manoeuvre pull as far as possible over to the far side of Silver Street before making the turn, in order to have maximum visibility of the pillars.

- due to the applicant's proposal to route all such HGV traffic via the northern part of the High Street, Church Street, the Market Square and the northern part of Silver Street, all HGV arrivals would be in the opposite direction to the main northbound traffic flow on these streets. This would disrupt the northbound traffic flow at points where, due to the restricted roadway, such traffic has to give way to oncoming HGVs; and
- as already noted, the numerous ancient listed buildings along this HGV route are particularly vulnerable to increases in noise, vibration and gaseous emissions.

A3.2.2.7 The Transport Assessment also fails to demonstrate that the surrounding junctions could cope with the increased traffic that the proposed development would generate, even on the basis of its own forecasts.

A3.2.2.8 In particular, its calculations show that the capacity of the London Road/Horsefair Green junction is inadequate to handle the extra traffic. Even without the development, the junction will be at saturation level by 2016, operating at just over the standard benchmark of 85% of its capacity<sup>48</sup>. With the development, the junction would be operating at the unacceptable level of 90.8% of its capacity<sup>49</sup>.

A3.2.2.9 Despite repeated attempts, the applicant has been unable to propose a way to increase the capacity of the junction without compromising pedestrian safety. The applicant's latest kerb-realignment proposal<sup>50</sup> — while still leaving the junction's flow/capacity ratio well above the 85% benchmark — would deflect the pedestrian desire line across the Horsefair Green arm of the junction. It would force pedestrians to use footway whose width on both sides of the arm is below the Department for Transport minimum acceptable standard of 1.5 metres, while increasing the speed of vehicles turning from London Road into Horsefair Green and making it more difficult for pedestrians to check for such vehicles and to establish priority against them<sup>51</sup>.

A3.2.2.10 As regards the Cofferridge Close/Silver Street junction (the sole vehicle access to the site), the Transport Assessment fails to calculate the leftward visibility splay for vehicles leaving Cofferridge Close. Visibility at this point is so limited by a projecting building line and by essential on-street parking that the flow of the junction is severely reduced, leading to peak-time tailbacks that are totally ignored by the Transport Assessment.

### A3.2.3 Conclusion

A3.2.3.1 For the reasons stated above, the Transport Assessment is deficient in its methodology, its forecasts and its evaluation of the traffic impact of thrusting a large supermarket into the heart of an ancient market town with narrow streets and pavements. Its conclusion of insignificant traffic impact is therefore fundamentally flawed.

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<sup>48</sup> Transport Assessment (Revised), Table 5.4.

<sup>49</sup> Transport Assessment (Revised), Table 5.5.

<sup>50</sup> 2140/SK/59 Rev B.

<sup>51</sup> See paragraph 9.3.4 above and supporting diagram.

## APPENDIX 4 — ACCESS: COFFERIDGE CLOSE & SILVER STREET

*(Reference section 8.2.2 above)*

- A4.1 Concerning the entrance into Cofferridge Close, there has been no formal assessment as to the capacity of this entrance to cope with the increased commercial and car traffic the proposed development would generate. The applicant has no jurisdiction over this crucial area of the site<sup>52</sup> and MKC are similarly silent on this issue. The public representations show this to be an area of grave concern. The brick pillars are regularly scraped and occasionally severely damaged by commercial vehicles, the entrance is used by most pedestrians entering and exiting from Silver Street and, contrary to the swept path analysis provided by the Agent's traffic consultant, in all practical circumstances it is unlikely that two commercial vehicles could safely pass each other in the entrance road as their diagram shows. (The applicants should be invited to provide a trial on-site to justify their assertion). Similarly the turn in and out for large articulated lorries is extremely tight and the manoeuvre disrupts traffic passing up and down Silver Street and requires the lorry cab to project over the opposite pavement on exiting. No Council Officer is known to have made on-site observation of how this entrance operates, which is surprising given the scale of the proposed development. Removal of on-street car parking in Silver Street would have no material effect on how the Cofferridge Close entrance operates.
- A4.2 The revised Transport Assessment states that the site would be improved to ensure that *'two large vehicles can pass each other anywhere within the site.'*<sup>53</sup> Similarly in the same document *'...once within the site delivery vehicles can pass each other in all of the public areas'*<sup>54</sup>. These assertions are not borne out in the drawings provided. In particular, the public crossing-point leading from the boundary of Cofferridge Close to the Health Centre and Market Square crosses the commercial vehicle access point for the new supermarket and the High Street businesses at its narrowest point where two delivery vehicles certainly cannot pass.
- A4.3 *For a little light relief, we recommend taking a look at "Swept path analysis 12m rigid truck" (uploaded 3/5/11). The consultants have found a way to extend the truck by 4.5 metres and to make it bend in the middle!! An elastic rigid truck!! A revolutionary transport concept!! (The worrying thing is that nobody spotted this howler before it was put up on the website).*

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<sup>52</sup> Transport Assessment, paragraph 5.7.3.

<sup>53</sup> Transport Assessment, paragraph 5.6.4.

<sup>54</sup> Transport Assessment, paragraph 5.7.3.

## APPENDIX 5 — SEVERANCE: MISREPRESENTATION OF EVIDENCE (Reference: Section 10.2 above)

### Discrepancies between Section 6.5 (Severance) of the Transport Assessment for Cofferridge Close (11/00143/FUL) and the relevant provisions of the Design Manual for Roads and Bridges

#### References:

Transport Assessment (TA), pages 32 and 33

Design Manual for Roads and Bridges (DMRB), Vol 0, Section 1, Part 2, Chapter 1 (May 2008)

DMRB Vol 11, Section 3, Part 8, Chapters 5, 6, 7 and 8 (June 1993) and Chapter 9 (August 1994) and Annex I (June 1993)

#### A5.1 Use of the Design Manual for Roads and Bridges (DMRB)

##### A5.1.1 The DMRB says:

**“Use of the DMRB by Other Highway Authorities [than those responsible for trunk roads]**

The DMRB sets a standard of good practice that has been developed principally for Trunk Roads. It may also be applicable in part to other roads with similar characteristics. Where it is used for local road schemes, it is for the local highway authority ... to decide on the extent to which the documents in the manual are appropriate in any particular situation. ... It is recommended that any local authority making use of this manual should establish formal procedures for considering whether it is appropriate to relax or depart from particular requirements.”

(DMRB, Vol 0, Section 1, Part 2, Chapter 1, paras 1.5 and 1.6)

##### A5.1.2 The Transport Assessment (TA) seeks to apply the DMRB to minor urban residential streets without reference to any decision of the local highway authority or to any formal procedures established by the latter.

(TA, pages 32 and 33)

#### A5.2. Definition of severance

##### A5.2.1 The TA correctly quotes the DMRB’s definition of severance as:

“...the separation of residents from facilities and services they use within their community caused by new or improved roads or by changes in traffic flows.”

(TA, para 6.5.1 and DMRB, Vol 11, Section 3, Part 8, Chapter 5, para. 5.2).

##### A5.2.2 But the TA omits to mention the following qualification which immediately follows the DMRB definition:

“The correlation between the degree of severance and the physical barrier of the road and its traffic is not straightforward.”

(DMRB, Vol 11, Section 3, Part 8, Chapter 5, para. 5.2).

##### A5.2.3 Contrary to the DMRB, the TA seeks to establish degrees of severance in terms of traffic alone.

(TA Tables 6.2 and 6.4).

### A5.3. Description of severance

#### A5.3.1 The DMRB says:

“New severance should be described using a three point scale, viz, Slight, Moderate or Severe severance.”  
(DMRB, Vol 11, Section 3, Part 8, Chapter 6, para. 6.1)

#### A5.3.2 In its Table 6.2, the TA changes the names of the DMRB’s degrees of severance from:

“Slight”, “Moderate” and “Severe”  
(DMRB, Vol 11, Section 3, Part 8, Chapter 6, para. 6.1)

to:

“Slight”, “Moderate” and “Significant”  
(TA Table 6.2)

This distorts the meaning of the DMRB in two ways:

- a) It implies that the first two levels are insignificant, which is not the meaning of the DMRB;
- b) Together with another change which the TA makes to the DMRB nomenclature (see para. A5.7.3 b) below), it creates the spurious impression that the degrees of severance in the row headings in TA Table 6.2 can be read across to the column headings in TA Table 6.3.

#### A5.3.3 The DMRB says:

“These descriptions should be coupled with an estimate of the numbers of people affected, their location and the community facilities from which they are severed.”  
(DMRB, Vol 11, Section 3, Part 8, Chapter 5, para. 5.2).

#### A5.3.4 The TA does not couple its description of severance with an estimate of the numbers of people involved.

(TA, para 6.5.5 and Table 6.4)

### A5.4. Factors to be considered in describing severance

#### A5.4.1 In its guidelines for describing community severance, the DMRB states:

“the following factors should be taken into account:

...

(b) the guidelines are applicable both to the direct effects of a scheme, and to effects caused by increases in traffic levels on existing roads. In all cases, it is important to take account of other important factors, such as:-

the number of people whose journey will be affected;

the presence of particularly vulnerable groups, such as children, the aged or the disabled;

the fact that crossing at-grade will take longer during peak hours;

the type of road involved;

the provision of mitigation.”

(DMRB, Vol 11, Section 3, Part 8, Chapter 6, para. 6.1)

A5.4.2 The TA does not take account of all these factors. In particular, it does not take account of the number of people whose journey will be affected or of the presence of particularly vulnerable groups, such as children, the aged or the disabled.  
(TA, pages 32 and 33)

## **A5.5. Assessment of severance**

A5.5.1 The TA claims that:

“The DMRB provides a set of measures for the identification of community severance ...”  
(TA, para 6.5.3)

A5.5.2 The DMRB does not provide a set of measures. It provides “guidelines for describing community severance” on its three-point scale of Slight, Moderate or Severe.

(DMRB, Vol 11, Section 3, Part 8, Chapter 6, para. 6.1)

A5.5.3 The TA claims that:

“The DMRB ... offers guidance as to the level of pedestrian diversion that may follow in terms of the two-way AADT of a link.”  
(TA, para 6.5.3)

A5.5.4 The pedestrian diversion distances mentioned in the DMRB do not follow from AADT levels. Pedestrian diversion and AADT levels are mentioned in the DMRB as two of three typical features, the presence of one or more of which will enable one of its three recommended descriptions to be used. They therefore apply independently of each other.

(DMRB, Vol 11, Section 3, Part 8, Chapter 6, para. 6.1).

## **A5.6. Thresholds of severance**

A5.6.1 The TA states that:

“Table 6.2 outlines the thresholds of community severance as prescribed by the DMRB.”  
(TA, para 6.5.3)

A5.6.2 The DMRB does not prescribe thresholds. The figures quoted in the centre column of TA Table 6.2 are cited in the DMRB as examples of traffic levels at which pedestrian at-grade crossing may be considered to justify one of its three recommended descriptions of severance, except in the case of vulnerable people (see para A5.6.3 below).

(DMRB, Vol 11, Section 3, Part 8, Chapter 6, para. 6.1).

A5.6.3 The DMRB deems moderate severance to exist, independently of any AADT level, where “some residents, particularly children and elderly people, are likely to be dissuaded from making trips”. Considerations such as AADT levels apply only to “Other trips”.

(DMRB, Vol 11, Section 3, Part 8, Chapter 6, para. 6.1, sub-para “Moderate”).



- A5.6.4 Contrary to this, the TA omits all consideration of the presence of children and elderly people, assessing severance in terms of AADT levels alone.  
(TA, para. 6.5.5 and Table 6.4).

#### A5.7. Relief from severance afforded by pedestrian crossings

- A5.7.1 The TA claims that:

“The DMRB provides guidance on the level of relief of severance that may be afforded by pedestrian crossings. Table 6.3 outlines the extent to which severance may be reduced by crossings.”

(TA, para 6.5.4)

- A5.7.2 The DMRB does not provide guidance on the level of relief of severance that may be afforded by pedestrian crossings, nor does it quantify such relief in percentage terms. Indeed, the DMRB never seeks to quantify levels of severance in numerical terms, limiting itself to its three broad descriptions (slight, moderate and severe).

(DMRB, Vol 11, Section 3, Part 8, Chapters 6 and 7)

- A5.7.3 Table 6.3 in the TA appears to have been constructed from Table 1 in para 7.4 of DMRB, Vol 11, Section 3, Part 8, Chapter 7, which has nothing to do with pedestrian crossings. The purpose and meaning of this DMRB Table 1 have been changed in the following substantive ways:

- a) The title of the table has been changed from:

“Categorising Relief from Severance by Reductions in Existing Traffic Levels”

(DMRB Table 1)

to:

“Relief from Severance afforded by Crossing Points”

(TA Table 6.3);

- b) The column headings have been changed from:

“Slight”, “Moderate” and “Substantial”

(DMRB Table 1)

to:

“Slight”, “Moderate” and “Significant”

(TA Table 6.3);

- c) The overall title of the column headings has been omitted:

“Level of Relief from Severance”

(DMRB Table 1);

- d) The value in the first column, first row, has been changed from:

“c. 30%”

(DMRB Table 1)

to:

“<30%”

(TA Table 6.3).

A5.7.4 The combined effect of these changes is to create the spurious impressions:

- a) that the column headings in TA Table 6.3 refer to existing degrees of severance as shown in TA Table 6.2 (themselves modified from the DMRB, see para A5.3.2 above).  
On the contrary, the column headings in DMRB Table 1 are descriptions of relief from severance that may be achieved by a reduction in traffic;
- b) that the values in TA Table 6.3 are percentage reductions in severance.  
On the contrary, the values in DMRB Table 1 are percentage reductions in traffic, from which a corresponding description of relief may be read off at the head of the column;
- c) that TA Table 6.3 can be used to read downwards, from an existing degree of severance in a column heading, to a percentage reduction in severance that it claims will be achieved, in a built-up area or in a rural area, by installing a crossing point. On the contrary, DMRB Table 1 is used to read upwards, from an achieved percentage reduction in traffic identified in the centre of the table, along the 'built-up area' row or 'rural area' row as appropriate, to the description of relief from severance shown at the head of the column in which that percentage figure appears.

A5.7.5 Based on this fabricated Table 6.3, the TA draws the extraordinary conclusion that:

"Where crossing points are placed to accommodate desire lines, the DMRB suggests that the effect of severance can be reduced by up to 90%."

(TA, para 6.5.4)

A5.7.6 This conclusion is apparently drawn from the 'rural area' row of TA Table 6.3. Its absurdity is demonstrated by the fact that Table 6.3 shows that the alleged 'reduction in severance' would seemingly be less in a built-up area.

A5.7.7 On the contrary, as the DMRB points out, the extent to which relief from a given degree of severance is felt by the community depends on the number of people wishing to cross the road. It is therefore more keenly felt in a built-up area than in a rural area.

"This needs to be seen in the context of the size of the community affected, the presence of vulnerable groups and the existing road standards. For example, a modest reduction in heavy goods vehicles through a small village with a tortuous main street and narrow pavements can be a substantial relief to the community. However a similar reduction on the edge of a conurbation, where there is little or no desire to cross the road, may be of little consequence."

(DMRB, Vol 11, Section 3, Part 8, Chapter 7, para. 7.1)