

Villagers Voice Staffordshire Moorlands
c/o Shelagh Wood
41 Sandon Road
Cresswell
Stoke on Trent
Staffs
ST11 9RB

Dear Shelagh

Outline planning application with all matters reserved (save access) for creation of up to 168 residential dwellings (Use Class C3), up to 33,480 square metres of Use Class B1, B2 and B8 floorspace, ancillary uses to include community centre and a shop (Use Class A1), together with highway works, landscaping, public realm, car parking and other associated works.

Reference SMD/2014/0576.

Many thanks for your instruction to Ruth Jackson Planning Ltd (RJP) for provision of planning advice in relation to the above major application at Blythe Park, Sandon Road, Cresswell. As discussed, this letter provides a strategic overview of the proposed development and has been prepared with reference to the following:

- Applicant's planning statement.
- Applicant's traffic and transportation section of the Environmental Statement.
- Applicant's socio economic section of the Environmental Statement.
- Staffordshire Moorlands Core Strategy.
- National Planning Policy Framework.

Please note that I have referred to the applicant's socio economic chapter of the Environmental Statement as opposed to the submitted design and access statement. This is because the overall principle of the development is the focus of my assessment and not the design, which at this stage is secondary.

My initial assessment is that the scheme proposed is not sustainable by virtue of its rural location, the absence of suitable existing local facilities to support housing growth, the unlikely generation of a critical mass of population to support potential new local facilities, and the lack of evidence of the need for the scale of commercial investment proposed. As such the proposal fails to comply with policies in the recently adopted Core Strategy, nor can it be argued to amount to sustainable development as set out in the National Planning Policy Framework. Whilst the housing element may

make a contribution to housing need, it is not in a suitable location and the evidence is not strong enough to justify a departure from the development plan.

DEVELOPMENT IN RURAL AREAS

Staffordshire Moorlands has a recently adopted Core Strategy (March 2014). This must be afforded much weight in consideration of this application. The applicant's planning advisors recognise that the development proposal is not supported by Core Strategy policy SS6c for other rural areas.

The site is located in the countryside outside of a recognised village. In such locations policy seeks to meet local needs, sustain the rural economy and enhance and conserve the quality of the countryside. New housing should be essential to local needs and the expansion of rural businesses should be limited. Priority is given to the need to protect the quality and character of the area. Uses which generate a substantial number of regular trips in areas not well served by public transport should be limited.

The policy notes that *"appropriate redevelopment of other major developed areas where the proposed development brings positive benefits to the area"* would be supported. The key word to note in this last clause of policy SS6c is *"redevelopment"*. The proposal presented is not looking to redevelop and modernise Blythe Business Park but to expand it (more than doubling the size from 31,500 sqm to 64,980 sqm by adding a further 33,480 sqm).

The applicant has not demonstrated how the scale of the proposed residential development is essential to local needs nor how the proposed commercial uses make provision for the limited expansion of rural businesses. The application documents attempt but fail to show how the proposed scheme will make a positive contribution to the local area or how they will bring vitality to the rural community.

In the context of making a positive contribution to the local community; existing local services are located between 2.5km and 3km distance (train station, shops and schools) and bus services currently run just two to three times a day. To mitigate against the unsustainable location, the proposal is simply to make an undetermined contribution to improving bus services.

Should the Council consider supporting the proposal it must be fully confident that the proposed shop will be commercially viable and that the bus services will be increased to an adequate level, i.e. sufficient to facilitate regular access to local services and facilities at Blythe and Uttoxeter Road.

The applicant's planning advisors note: *"the community facility will be flexible and could be managed and run either by the Parish Council, a local community group or by the owners of Blythe Business Park"*. There is no clear plan in place of what the facility would be used for or to demonstrate how such a 'facility', that will be costly to run and maintain, will be financially sustainable.

The applicant's planning advisors also note in relation to the village shop that the: *"unit will be designed in order that it can adapt to the needs of the market and be converted to residential use in the future if appropriate"*. There is no evidence that a shop unit is commercially viable in this location. The applicant has phrased the proposal such that there is no guarantee that a shop will be sustained on the site.

Further to this, the draft Section 106 Heads of Terms submitted with the application fail to provide any detail with regard to the nature, timing of provision for and funding of either the community facility or bus service improvements.

NEW EMPLOYMENT DEVELOPMENT

The applicant's planning advisors note: *"the expansion of Blythe Business Park will help local businesses to expand... It will also contribute towards a strengthened and sustainable rural economy"*.

The Staffordshire Moorlands Core Strategy policy E1 for new employment development supports proposals for employment uses in classes B1 (business), B2 (industrial) and B8 (warehouse and distribution) subject to a range of constraints including:

"B1: should be located in existing or proposed employment areas or in or on the edge of town centres. Preference will be given to town centre locations... Elsewhere business developments will only be permitted for the expansion of existing businesses or for small scale developments provided they would not have an unacceptable impact on the amenities, character or appearance of the area."

"B2: new industrial development should be located in existing or proposed employment areas. Elsewhere industrial developments will only be permitted for the expansion of existing businesses provided they would not have an unacceptable impact on the amenities, character or appearance of the area."

"B8: new warehouse and distribution uses should be located in existing or proposed employment areas where there is ready access to roads which are higher in the road hierarchy and where sensitive areas are less likely to be affected by heavy goods vehicles."

The development proposal is to more than double the size of Blythe Business Park: paragraph 7.24 of the planning statement indicates that approximately 430 new jobs would be created, adding to the existing 300 jobs currently in place. This scale of expansion of investment would be welcomed, if it was genuinely deliverable and in the right location. However, creating space for large scale, speculative, commercial expansion in the open countryside is not sustainable. This is not the right location for this type of new, unplanned development.

Staffordshire Moorlands Core Strategy policies SS6c and E1 make it clear that evidence should be provided to demonstrate that the expansion of the Blythe Business Park will result in no harm to the amenity, character and appearance of the local area. However, as an outline application with all matters reserved except access, it is not possible to determine what uses will be provided and how their impacts on existing and future residents will be managed.

It is noted in the applicant's planning statement (paragraph 7.41) that: *"the expansion is required locally in order to accommodate growth for existing businesses and to meet the demand from new businesses wanting to locate here. It should be noted that the employment development could not be reasonably sited on alternative sites given that existing occupiers are expected to locate into the new development, and are keen to ensure that they retain their business in this location due to its close proximity to transport links"*.

No evidence of this need or demand is presented. Where the applicant is seeking to break with policies that encourage only limited expansion of employment uses in the countryside, it is reasonable to expect that a fully comprehensive evidence base of need would be provided. Otherwise it can only be concluded that the planned expansion is speculative and not guaranteed to deliver the best outcome for Staffordshire Moorlands.

ACCESS

Development in areas outside of identified towns and villages is limited by planning policy where growth other than to meet “essential local needs and for rural activities” is generally inappropriate (Core Strategy paragraph 8.1.33 Other Rural Areas).

The travel to work data presented by the applicant sets out that some 92.7% of trips in the local area are by car or van (plus a further 2.7% travelling as passengers). Para 9.36 of the traffic and transport chapter of the Environmental Statement notes: *“the predominant mode of transport for current residents of Cresswell travelling to work is the private car... This is as to be expected given the semi-rural location of the site”*. Even in the event that the applicant’s proposals encourage the use of more sustainable modes of transport in this area, it is not realistic to state that a significant change in patterns can be achieved.

The development, both of housing and commercial uses, will generate a significant increase in traffic activity because of its rural location. The daily trips by car or van are projected at table 9.13 of the same document and are projected to reach 2,870 out of 3,426 trips or 83% of all trips.

The data presented by the applicant sets out that the local road network does have the capacity to accommodate the increased activity. This is not, however, a justification for the scheme. The proposal will *“generate a disproportionate number of additional journeys outside of the village and may undermine the (Council’s) spatial strategy”* (Core Strategy paragraph 8.1.33 smaller villages).

SUSTAINABILITY

Staffordshire Moorlands Core Strategy Development Principles policy SS1 expects development and use of land to contribute positively to social, economic and environmental improvements. It expects delivery of quality local services and easy access to jobs, shops and transport services.

This proposal is promoting significant growth in the countryside without a clear business strategy in place to establish how supporting services can be delivered. There is no guarantee that the proposed retail provision will be delivered. Contributions for school places are for schools some 3km away. Proposals for 33% affordable housing are presented without clarity on how local bus services will be improved to ensure those without cars would not be isolated from essential services.

The proposal has not taken a sequential approach to the sustainable location of development. It is not a town centre location or even within one of the three Staffordshire Moorlands towns set out as a focus for new development in policies SS3 and SS5. All new development is on existing agricultural land and not previously developed land. It is not, therefore, possible to state that the proposal is in line with policy SS1 of the Core Strategy, which sets out the key principles for how development should be delivered in Staffordshire Moorlands.

The proposal is a speculative solution that will maximise the opportunity of an existing agricultural land holding. The opportunity to promote integrated sustainable development does not present itself in this location. Cresswell will not become a sustainable and self-sufficient settlement as a consequence of this investment.

It is my professional judgement that what is proposed is not appropriate in planning terms. With reference to the National Planning Policy Framework’s position on what constitutes sustainable development, I would note that the proposal does:

- Not promote economic investment of the right type in the right place.
- Not support the creation of a strong, vibrant and healthy community as it will be new housing and employment without proper access to local services that meet local needs.
- Not deliver environmental benefits by virtue of the fact that it will result in the loss of agricultural land and generate a disproportionate amount of additional and unnecessary traffic away from existing suitable urban centres.

Paragraph 7.15 of the applicant's planning statement notes that *"Given the scale of the development, it is acknowledged that the proposals must be carefully considered in the context of policies SS6c and R2 of the adopted Core Strategy. In this regard, there are other material considerations which need to be taken into account in the determination of this application, namely the NPPF (National Planning Policy Framework)."*

Based on my review of the proposal and the evidence presented, I cannot agree that the National Planning Policy Framework provides a justification for the proposal. Whilst providing additional housing, this is in the wrong location and whilst generating economic growth, this is too large in scale for the rural location and without robust evidence to provide a convincing justification for the harm to the countryside.

Yours sincerely

Ruth Jackson
BA MRUP MRTTP



Our Ref NW91169/PT/JP

25 November 2014

Shelagh Wood
VVSM
49 Sandon Road,
Cresswell,
Stoke-on-Trent,
ST11 9RB

JMP Consultants Ltd
City Tower
Piccadilly Plaza
Manchester
M1 4BT

T 0161 831 5600
F 0161 831 5601
E manchester@jmp.co.uk

www.jmp.co.uk

Dear Shelagh

**PROPOSED MIXED USE DEVELOPMENT LAND AT BLYTHE BUSINESS PARK,
CRESSWELL - JMP TECHNICAL REVIEW**

JMP Consultants Ltd [JMP] have been commissioned by Villagers Voice Staffordshire Moorlands [VVSM] Group to undertake a review of a Transport Assessment [TA] and Framework Travel Plan [FTP] prepared by consultant Motion, submitted in support of proposed mixed use development land at the existing Blythe Business Park, Cresswell on behalf of Scentarea Limited.

The development proposals are for:

- 168 residential dwellings;
- 33,480m² of B1 / B2 / B8 floorspace;
- Ancillary uses, such as a community centre and shop; and
- Highway works, landscaping, public realm, car parking and other associated works

JMP have undertaken a detailed technical review of the contents of the TA, to ascertain the suitability of proposals and the soundness of the transport work prepared. Furthermore, this review aims to highlight the concerns expressed by VVSM with regard to the current development proposals and the impacts on the transport network.

It is noted that formal pre-application discussions have taken place between the applicant, the Highways Agency [HA] and Staffordshire County Council [SCC] Highways.

This technical review has been prepared in the order in which the issues are presented in the TA prepared by Motion.

Policy Review

Motion have included a section setting out the transportation policy context in relation to the proposed site. The TA identifies the following policy documents as key to this context:

- National Planning Policy Framework [NPPF]:

".....local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport".

• Staffordshire Moorlands Core Strategy [SMCS]:

"The Council will promote and support development which reduces reliance on the private car for travel journeys, reduces the need to travel generally and helps deliver the priorities of the Staffordshire Local Transport Plans, where this is consistent with other policies".

JMP do not deem the development to be compliant with the above policies, and as a consequence, this view will be justified and demonstrated within this review.

Furthermore, the proposed development site is not allocated in the 'old' Staffordshire Moorlands District Council Local Plan, which is considered as valid whilst the Site Allocations Development Plan Document is being prepared. As such, the proposed development is not considered planning policy-compliant.

It is suggested that 400 jobs will be created with the expansion of Blythe Business Park through the development proposals, which equates to a similar number proposed within the TEMPRO database for the whole of the Staffordshire Moorlands. Also, it is identified within the SMCS that 1,395 dwellings are required to be built within the Staffordshire Moorlands area, and as such, it is not considered appropriate to located 12.5% of the entire Local Plan housing supply in a rural settlement with rural infrastructure.

In paragraph 2.14 the TA states that *"SMCS has not saved the local plan's policies in regards to parking and parking standards. Nor does Staffordshire Moorlands District Council have a standalone parking standards document. As such, it would be noteworthy to recognise the previous the previous parking standards set out in the former local plan"*.

However, it is noted that SCC has confirmed that this is an acceptable approach to derive parking supply for the proposed development.

JMP have conducted this review in line with the Department for Transport's [DfT] Guidance on Transport Assessments [GTA], however, the GTA was officially withdrawn on 22nd October 2014. Notwithstanding, given that during the period that the TA was produced, the GTA was still the foremost document in terms of assessment of development impacts, it is considered a suitable policy consideration for JMP to utilise in this review.

Finally, it is also noted that the TA makes reference to DfT Circular 02/2007, which is no longer a valid policy document. The latest HA policy for considering the impact of development at the Strategic Road Network [SRN] is Circular 02/2013.

Site Location and Existing Use

In paragraph 1.5 of the TA it states that the *"site benefits from relatively good levels of accessibility to the commercial centre of Blythe Bridge and associated amenities"*.

JMP do not believe that this is demonstrated in the TA, nor correct in reality, given that the majority of amenities, such as schools and shops, are some distance from the site. Schools located in Blythe Bridge and Fulford are over 2 miles from the site, and the majority of trips to these would be made by car due to the extremely limited public transport options (discussed later in this review). JMP also do not believe that there is an obvious local catchment for the employment element of the proposed development, and given the extremely limited public transport options this would result in non-policy compliant implications in terms of both highway impact and a negligible sustainable mode share of the proposed development.

Given that the development proposal includes a considerable residential component and relatively low potential for travel by sustainable modes, this will only add to the significant number of private vehicle trips that will be generated by the employment element and put pressure on the road network in the vicinity of the site.

Existing Highway Network

The proposed development site lies approximately 3km to the south east of A50 which is part of the HA's Strategic Road Network which is accessed via the A50 / A521 roundabout. The proposed site will be accessed via Sandon Road / Cresswell Road. This road meets Uttoxeter Road to the north of the site providing connections to Blythe Bridge and Stoke-on-Trent via the A50.

Manual for Streets 2 paragraph 7.2.2 states that *"carriageway widths should be appropriate for the particular context and uses of the street"*.

VVSM have conducted independent measurements of the carriageway width on Sandon Road / Cresswell Road and have determined that at the narrowest points, the road width is approximately 5.16 metres across, compared to that of 5.2m presented in the Motion TA report. Given that the site is also expected to generate considerable HGV traffic (servicing and construction), JMP would raise strong concerns that the current road network in the vicinity of the site is inappropriate to accept additional traffic, particularly in respect of additional HGV movements which will include articulated vehicles (16.5m). It is also noted that the maximum width for HGVs is some 2.55 metres (excluding driver mirrors)¹. If the figure of 5.2 metres for carriageway width is used this as a measure, a gap of only 10cm between two passing HGVs could be left. This gap would be reduced further if the measurements made by VVSM are accounted for. In addition, the carriageway is banked either side by boundary walls and foliage, creating a narrow perception of the road for drivers, thus reducing any available gaps between passing vehicles.

The TA makes the following observation in paragraph 3.6 *"on-site observations have established that the existing Blythe Park Industrial Estate access is subjected to restricted visibility that does not accord with current standards"*. While it is recognised by JMP that the TA details proposals to close this access and create a new three-arm roundabout, the development proposals suggest that this access is suitable for emergency vehicles, pedestrians and cyclists.

On the basis of the above statement included in the TA, this appears to be a contradictory approach to access arrangements. Given that the existing access, whilst being retained for emergency vehicles, pedestrians and cyclists, will still exhibit an intensification of use as a consequence of the development proposals coming forward, with the existing visibility issues continuing to be an issue. This intensification will increase safety issues at this location, as a consequence of the existing visibility issues.

Existing Accessibility

The site lacks adequate cycle infrastructure to encourage substantial trips by this mode, and JMP have concerns that the TA is being deliberately disingenuous in suggesting that the road infrastructure is suitable for trips by bicycle.

¹ Driver and Vehicle Standards Agency *"Lorry Types and Weight Guide"*

JMP acknowledge that SCC has identified some of the roads as “advisory cycle routes”, but it is likely that these routes have been identified simply due to the absence of more appropriate routes. The rural and narrow nature of the roads immediately surrounding the site would discourage all but the most hardened cyclists. In addition, the rural nature of the roads are likely to attract vehicles travelling at high speeds which will not be conducive to safe road conditions for cyclists.

The TA accepts that accessibility to the site for those wishing to travel on foot is limited. Much of the road network is unsuitable for pedestrians due to the absence of pedestrian infrastructure. Where footways are present, they are often narrow and discontinuous, requiring pedestrians to cross the road unaided due to absence of formal crossing points.

Current public transport provision to the site is extremely poor. The TA details an existing bus service running along Cresswell Road with the nearest bus stop 500m from the site. Due to a lack of clarity within the TA, JMP have made the assumption that this distance has been calculated from the centre of the site, it is worth noting that the furthest point on the site is over 700m from the closest bus stops.

The site is served by a single infrequent service, with the TA making reference to the number 249 service. However, JMP have only been able to identify a number 4 bus service. Notwithstanding, the bus stops fall outside the recommended walking distance² of 400m, and are sited at a distance which would strongly inhibit bus use for those travelling to and from the site. Furthermore, using the submitted masterplan as a guide, JMP have determined that the furthest point of the proposed site from the bus stops is over 1km away.

It is noted that this service does not provide coverage for the morning and evening peak periods and as such does not cater for normal daytime commuter trips. In addition, there are no services on a Sunday and limited services on a Saturday, reducing the potential for trips by bus for the residential element of the development and the proposed community centre.

According to the TA, the developer has committed to a financial contribution towards the provision of bus services via Cresswell. However, no details are provided in relation to this proposed contribution. As such, JMP are unable to determine what level of service will be achieved and whether the services will cover peak periods. Furthermore, there is no guarantee that the service would be considered a viable service once the funding secured via developer contributions have ended, due to concerns regarding the ability of a residential development of this size and wide distribution of inbound commuter trips to provide sufficient demand to support a new service.

However, despite the lack of information provided within the TA, JMP have considered the level of service, and critical mass in terms of users, that would result in a viable service. With good layout focussed on bus stops, good prior marketing and information, and a direct and reliable bus service, a new area *should* be able to achieve a reasonable level of bus use. This paragraph provides a context to consider the viability of providing new bus services, based on the following notional assumptions:

- A single, radial service, with other pick-up and drop off opportunities;
- The ‘anchor’ housing area needs to provide 20 commuter passengers per bus;

² The Chartered Institute of Highways and Transportation (CIHT) “Guidelines for Planning for Public Transport in Developments”

- Twice hourly services during the two-hour commuting peak (plus of course, a good level of off-peak service);
- A general level of commuter mode split of 8 percent using bus;
- Half the bus commuters are working in local centres being served on the route; and
- One employed resident per dwelling.

Combining these assumptions:

- 20 x 4 is 80 bus commuters per day, required to justify the radial route;
- These are half of the total bus commuters, that is 160 bus commuters per day;
- If these represent some 8 percent of the commuters, that gives a commuter total of $160/0.08$ that is 2,000 commuters – say 2,000 households.

This simplistic assumption suggests that a properly arranged residential development of about 2,000 households could justify a new commercial – and more importantly – viable bus service. This highlights that the proposed development cannot justify a viable bus service.

In the absence of any information provided in the TA regarding the proposed bus service / funding, it is not possible to consider any material beneficial impact from this commitment. It is also noted that there is no applicable adopted Community Infrastructure Levy in place, so monies cannot be secured through this mechanism to contribute towards public transport services.

Blythe Bridge is the closest station to the proposed development site with hourly services to locations including Crewe, Stoke-on-Trent and Derby. Reaching the rail station on foot from the site is not viable as the distance, over 3 kilometres, exceeds recommended guidelines. This, coupled with the limited walking infrastructure in the vicinity of the proposed site, would discourage travel to work journeys by this mode.

It is concluded that the site is considered unacceptable in accessibility terms and cannot be brought forward without significant investment in public transport services and infrastructure for active travel modes.

Accident Data

The TA includes an assessment of accident data. Detailed accident data obtained from SCC for a period of approximately 6.5 years, 1st May 2007 – 30th September 2013, is included in Appendix F of the TA.

It is not clear from the information provided in the TA to what extent the analysis of accident data considers the A50 mainline. The submitted information contains no mapping of the accident data and JMP would advise that this is clarified in order for a full understanding of the accident assessment to be obtained.

Appendix F considers accidents on the A50 approaches to the A50/A521 junction, but JMP are unable to determine what the maximum extent of the searched area was. Without this information being produced, JMP is unable to determine the robustness of assessments presented in the TA.

However, despite this, it can be stated that as a consequence of the proposed development, the intensification in use of Sandon Road and Cresswell Road – which both have driveway frontages to residential properties – has the potential to reduce road safety and increase accidents on the local road network.

It is also observed that a number of the accidents identified within the provided information involved HGVs or good vehicles, and the increase of HGVs as a consequence of the proposed development will exacerbate the current accident rate involving such vehicle types.

Proposed Development

The following development aspirations have been outlined in the TA:

"Outline planning application with all matters reserved (save access) for the creation of up to 168 residential dwellings (Use Class C3), up to 33,480 square metres of Use Class B1, B2 and B8 floorspace, ancillary uses to include a community centre and a shop (Use Class A1), together with highways works, landscaping, public realm, car parking and other associated works."

The development proposals include the creation of a new 3-arm roundabout on Sandon Road which will act as a shared access to both the residential and commercial units. The TA details how the existing access will be closed and will become an emergency access, which is also intended to be accessible to pedestrians and cyclists.

It is not considered acceptable for the proposed employment development element of the proposals to be accessed via the same access road at the residential element of the site, more so given that the employment site will play host to a number of HGVs including articulated vehicles associated with the B2 and B8 elements, which are considered wholly unsuitable to be accessing residential areas on a frequent basis. JMP would expect the entrance to the site where the residential element of the site resides to be more 'place' orientated, as opposed to an access to an employment element, which would be more 'traffic' orientated. Given that both elements share the same access, JMP are of the opinion that the different uses provide a conflict.

Committed Developments and Traffic Growth

TEMPRO has been used as the basis for traffic growth assumptions using localised growth rates for 'Rural Staffordshire Moorlands' district. While this approach is considered appropriate in principle, no supporting information on the predicted levels of jobs created by the proposed commercial element of the development has been provided.

As such, it is considered that SCC is not in a position to accept the assumptions presented.

Person Trip Generation and Modal Splits

Motion state in the TA that trip rates for the proposed development have been determined with regard to the outcome of surveys undertaken at the existing Blythe Bridge Business Park and Sandon Close residential area along with data extracted from the TRICS database. JMP has not been able to identify any evidence of surveys or TRICS analysis in the submitted information. Without the ability to adequately

assess the information from which these trips rates were sourced, JMP cannot verify the assumptions presented, nor can SCC. In addition, the above methodology assumes that all of the existing units at the business park are occupied; otherwise trip rates are potentially underestimated.

The TA states that Axiom Traffic Limited was commissioned to undertake Manually Classified Turning Counts to determine existing vehicle movements and inform the baseline traffic conditions. These counts were conducted on Tuesday 16th April 2013 and Wednesday 22nd January 2014 between the hours of 07:00 – 10:00 and 16:00 – 19:00. In addition to the manual counts, the TA details the use of further surveys conducted by way of an Automatic Traffic Counter [ATC] on Cresswell Road. This was installed between Tuesday 21st and Monday 27th January 2014.

JMP holds concerns regarding the suitability of using traffic data collected in January, as it is a 'non-neutral' month³. The use of this data to inform an understanding of baseline traffic conditions calls into question the robustness of the analysis presented in the TA.

Furthermore, evidence of the ATC is not provided within Appendix B of the TA as stated within the text. As such, JMP cannot verify the base flows provided within the TA. In addition, it is not known where the ATC was located on Cresswell Road, and as such, JMP are not in a position to comment on its suitability in terms of location. It is worth commenting that the Draycott Sports Centre is located at the northern end of Cresswell Road, and will impact upon the flows due south of the Cresswell Road / Uttoxeter Road junction compared to closer to the proposed development site.

The TA uses 2011 Census data to "*assess the relative attractiveness of the sustainable modes of transport*" (Paragraph 3.22) and inform multi-modal trip generation for the proposed development. Given that the site is practically inaccessible on foot, JMP are unable to understand why a baseline mode split of 1.8% for residential and 6.6% for commercial has been presented.

The same assumption is true for cycling where, despite the lack of appropriate infrastructure, the TA presents a mode split of 2.2% for the commercial element of this development. Furthermore, a mode split for bus users has been presented as 0.9% for residential trips and 2% for commercial. Whilst not considered to be large numbers in terms of percentages and actual number of peoples, as demonstrated by JMP earlier within this review, it is not possible that the bus service provision could sustain this mode split, despite it being a relatively modest percentage.

In summary, the mode split presented does not accord with current provision to the site, and as a consequence JMP do believe that the TA could have arrived at a representative trip generation figure for the proposed development.

Junction Capacity Assessments

Paragraph 5.15 of the TA states that "*it should be noted that the guidance prepared by the Department for Transport indicates that the detailed capacity assessments should be focused upon those junctions that are expected to experience and increase of 30 or more vehicles during the assessment period*".

While not directly referenced in this paragraph the "guidance" is presumed to be the DfT's GTA where 30 or more **two-way** trips are identified as an appropriate threshold for junction capacity assessments. JMP

³ Highways Agency *Design Manual for Roads and Bridges Interim Advice Note 39/01*

therefore recommend that the junctions identified for assessment are revisited as it is not clear if this threshold has been adhered to.

The TA indicates that the following traffic growth scenarios have been used in the junction assessments:

- 2013 Base Year;
- 2019 'Without Development';
- 2019 'With Development';
- 2024 'Without Development'; and
- 2024 'With Development'.

It is not clear in the TA whether or not the 2019 'With Development' scenario represents 100% of the development proposals, in line with DfT Circular 02/2013 for the Strategic Road Network [SRN]. As such, this lack of clarity within the TA does not allow this assessment year to be assessed fully.

The TA indicates that the following junctions have been included in the study area for assessment:

- A50 / A521 Roundabout [SRN];
- A521 / Uttoxeter Road / Woodlands Lane staggered crossroads;
- Uttoxeter Road / Stallington Road / Cheadle Road;
- Uttoxeter Road / Cresswell Road;
- Sandon Road / Blythe Business Park;
- Sandon Road / Sandon Close; and
- Sandon Road / Rookery Crescent.

For clarity, these junctions have been highlighted on the map below:

Figure 1 - Study Area



In the TA, Motion have used percentage impact to illustrate the results of their junction assessments. Percentage impacts are no longer considered a relevant means of gauging development impact at junctions.

Figure 2 - Queue Length Photo (Cresswell Road, Typical Weekday Evening)



It is considered that the junction assessments undertaken in the TA do not reflect the on-site queuing observations observed by VVSM (as seen in **Figure 2**). On-site observations show long queues on the

Northbound Cresswell Road approaching its junction with Uttoxeter Road. It is evident that the information provided in Table 3.1 of the TA does not accord with the observed observations. As such, the queue length surveys either need to be redone or disregarded.

Tables 1 and 2 below have replicated the turning movements at the existing site access and the Cresswell Road / Uttoxeter Road Junction:

Table 1 - Turning movements leaving from current site access

AM - OUT		PM - OUT	
North	South	North	South
76.5%	23.5%	79.1%	20.9%

As there are no trip attractors south of the site, both in terms of amenities and settlements, it is not considered appropriate to distribute such a high percentage of trips to the south of the site, on a predominantly rural road network. As such, routing more traffic north of the site would be considered more representative.

Table 2 - Turning movements at the Cresswell Road / Uttoxeter Road Junction

AM				PM			
IN		OUT		IN		OUT	
Uttoxeter Rd West– Cresswell Rd	Uttoxeter Rd East– Cresswell Rd	Cresswell Rd– Uttoxeter Rd West	Cresswell Rd – Uttoxeter Rd East	Uttoxeter Rd West– Cresswell Rd	Uttoxeter Rd East– Cresswell Rd	Cresswell Rd– Uttoxeter Rd West	Cresswell Rd– Uttoxeter Rd East
42.4%	57.6%	45.2%	54.8%	62.3%	37.7%	56.6%	43.4%

Furthermore, the TA distributes 76.5% of traffic northbound in the AM peak and 79.1% in the PM peak, thus exacerbating the queues observed on the Cresswell Road arm of the junction. However, distributing more traffic southbound out of the site would also be considered unsuitable due to the rural nature of the road network to the south of the site, paying due cognisance to the small settlements of Fulford and Hilderstone. The increase of HGVs on the local road network should not be allowed to impact upon rural settlements unless suitable measures were introduced.

At the Cresswell Road / Uttoxeter Road junction, the TA also distributes 41.9% of development trips east; towards Tean (AM Peak). It is not considered that such a large percentage of traffic would make this movement, and would be drawn towards the settlements of Blythe Bridge and Stoke-on-Trent, in a westbound direction at this location and access to the SRN via the A50 / A521 junction. Given that the TA also distributes an unrepresentative percentage of trips south from the site, it is considered that the trip distribution should be revised, to distribute more traffic north west towards Blythe Bridge and Stoke-on-Trent, and not towards the rural settlements to the south and east of the site.

The TA includes junction capacity assessments of the opening year (2019) and 10 years post application (2024) for the 'With Development' Scenario. JMP have reproduced the results of the assessments in **Table 3** (Opening Year) and **Table 4** (2024) and highlighted in bold Ratio of Flow to Capacity [RFC] values that raise particular concern:

Table 3 - Opening Year Assessment

Approach	Without Development				With Development			
	Morning Peak		Evening Peak		Morning Peak		Evening Peak	
	RFC	Queue	RFC	Queue	RFC	Queue	RFC	Queue
A521	0.62	2	0.70	2	0.74	3	0.76	3
A50 South	0.85	5	0.78	4	0.86	6	0.79	4
A50 West	0.80	3	0.76	3	0.81	4	0.78	3
Delay	7.46 seconds		5.95 seconds		8.70 seconds		6.8 seconds	

Table 4 - 2024 (10 years post application) Assessment

Approach	Without Development				With Development			
	Morning Peak		Evening Peak		Morning Peak		Evening Peak	
	RFC	Queue	RFC	Queue	RFC	Queue	RFC	Queue
A521	0.72	3	0.81	4	0.88	6	0.87	5
A50 South	0.91	9	0.84	5	0.92	9	0.85	5
A50 West	0.50	5	0.81	4	0.86	6	0.82	5
Delay	10.62 seconds		8.05 seconds		11.42 seconds		9.35 seconds	

It is clear from comparison between the two scenarios that the development proposals will have a measurable negative impact on the capacity of nearby junctions. It is noted that in paragraph 6.16 of the TA it is stated that *"the proposed development will not have a material impact upon the local highway network"*. Given **Tables 3** and **4**, JMP's consideration that existing queues lengths have not been appropriately considered within the junction assessments, and JMP's concerns regarding the trip distribution used, it is considered that the junction assessment outputs cannot be accepted by SCC and the HA.

Mitigation / Highways Works

The following highways works have been put forward to support the development proposals:

- A new three-arm roundabout to serve the proposed mixed-use development;
- The provision of a new footway along Cresswell Road; and

Travel Plan

Motion has submitted a Framework Travel Plan [FTP] in support of the proposed commercial and residential development at Blyth Business Park in Cresswell. This has been reviewed by JMP in conjunction with the submitted TA with the issues highlighted as they appear in the FTP.

It is noted that the FTP highlights the fact that as only outline planning permission is sought by the applications the staffing numbers are unknown.

Paragraph 1.6 of the FTP states that *"despite the semi-rural location of the site it benefits from [sic] a choice of transport modes that have the potential to reduce reliance upon the private car"*. In short, JMP do not believe that Motion is in a position to make this assertion. In summary, JMP hold the following fundamental concerns relating to the above statement:

- An acknowledgement by Motion that walking to the site is unlikely due to distance of the site from key residential areas;
- An additional acknowledgement in the FTP of the relative lack of footways in the area further discouraging those wishing to travel on foot;
- There is virtually no cycle infrastructure on the roads surrounding the site. The roads are narrow and rural in nature which acts as a significant barrier to encouraging trips by bicycle;
- Blythe Bridge rail station is around 3km from the site and as a result is not considered within reasonable walking distance, which is acknowledge in the submitted information. The rail station is within a reasonable distance for those travelling by bicycle but this limits it potential usage considerably;
- The two bus stops identified in the FTP as serving the site are around, according to Motion, 500m from the site. This is well outside the DfT's recommended walking distances and this distance would suppress any potential trips by bus; and
- The bus stops are served by a single infrequent service which does not cover peak periods and is therefore not suitable for trips associated with commuting.

The FTP makes reference to the following NPPF policy which outlines the importance of transport policies in facilitating sustainable development and includes the statement that planning should:

"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 and can be made sustainable".

In addition to making reference to this national policy framework the FTP also makes reference to Policy T1 of SMCS, which states that a reduced reliance on private car travel will be achieved a range of requirements including:

"Ensuring that major development is located in areas that are accessible by sustainable travel modes or can be made accessible as part of the proposal"

"Provide proactive facilities and measures to support sustainable travel modes including on-site features to encourage sustainable travel methods e.g. cycle path links, cycle storage facilities, bus stops etc"

JMP take the view that the development proposal is not compliant with these policies when considering the consideration of accessibility to the site included earlier in this review.

An inconsistency between the stated distance of the site and the bus stops has been noted with the TA citing 500 metres and the FTP 450 metres.

The FTP makes reference to the proposed delivery of a new footway opposite the Izaak Walton Public House. The provision of this footway will not lead to any material improvements to accessibility for pedestrians and will not encourage trips to the site of this nature. As outlined in JMP's review of accessibility of the site, the distances from residential areas and infrastructure provision in the wider area is not suitable for journeys by foot. This is even stated in paragraph 3.9 of the FTP, *"it is considered that the location of the site in relation nearby residential areas is such that walking is unlikely to provide a viable alternative to the private car for journey to work trips"*. JMP does not consider that the provision of this footway will assist in overcoming these barriers to travelling on foot.

Reference is made to the number 4 bus service in the FTP but number the number 249 is referred to in the TA. JMP in their review of accessibility earlier in this document have demonstrated the location of bus stops and current service provision to be wholly inadequate.

JMP would again reiterate that the developer's commitment to provide a financial contribution to provide additional bus services is an entirely moot point, as no details of this contribution have been provided. As a consequence, there is no possible way of understanding what impact this will have on private vehicle trips.

The FTP uses 2011 Census data to *"assess the relative attractiveness of the sustainable modes of transport"* (Paragraph 3.15) and inform targets. JMP take considerable issue with the baseline modal split used.

Given that the site is practically inaccessible on foot, JMP are unable to understand why a baseline mode split of 1.8% for residential and 6.6% for commercial has been presented. The same issue is true for cycling where, despite the lack of appropriate infrastructure, the FTP presents a baseline of 2.2% for the commercial element of this development. Furthermore, a baseline mode split for bus users has been presented as 0.9% for residential trips and 2% for commercial. As demonstrated by JMP within this review, the existing bus service provision could not sustain this mode split, despite being a relatively low modal split for these travel choices. On this basis, JMP deem the baseline mode split and targets presented in the FTP to be unacceptable, and recommend that they cannot be supported by SCC.

Table 5 below provides a review of some of the measures proposed in the FTP to support sustainable means of reaching the site:

Table 5 - FTP suggested measures

Measure included in FTP	JMP comments
6.4 Walking	
<i>"The inclusion of new pedestrian links that will connect the site with the existing sustainable transport networks and the range of community"</i>	The improvements to pedestrian infrastructure will have no material impact on this mode.

<i>facilities that are outlined in Section 3"</i>	
<i>"A new footway located opposite the Izaak Walton Public House that will delivered as part of the proposed development and will improve pedestrian linkages to the north"</i>	
6.5 Cycling	
<i>The inclusion of new cycle links that will connect the site with the existing sustainable transport networks and the range of community facilities that are outlined in Section 3"</i>	No reference has been made to new cycle links in the FTP. No details of this proposed measure has been provided.
<i>"The commercial uses will also benefit from secure cycle stores that will be evenly distributed across the site in locations that are subject to good natural surveillance and with a short walk of main entrances"</i>	No details have been provided and JMP are unable to verify whether the proposed cycle parking will be in line with guidance on parking standards.
<i>"The use of cycle parking facilities will be monitored. Additional parking facilities will be provided should demand warrant it"</i>	No details have been provided on how frequently this monitoring will take place.
6.6 Public Transport: Bus services	
<i>"A commitment to provide a financial contribution towards enhancing the existing sustainable transport provision in Cresswell"</i>	No details of this contribution have been provided and it is not possible to determine what, if any, impact this measure will have.

In summary, JMP believe that the FTP submitted in support of the proposed development at Blythe Business Park will not encourage the use of sustainable modes of transport. The site itself is not appropriately located to promote these modes and the measures suggested within the FTP are inadequate. JMP cannot accept that this document will alleviate any of the pressures the proposed development would place on the local network and private car ownership would remain high, in direct conflict with local and national planning policies.

Summary and Conclusions

JMP Consultants Ltd have been commissioned by Villagers Voice Staffordshire Moorlands to undertake a review of a Transport Assessment prepared by consultant Motion, submitted in support of proposed mixed use development land at Blythe Business Park, Cresswell on behalf of Scentarea Limited.

In paragraph 1.7, the TA asserts that a number of required criteria for a robust assessment of transport conditions have been fulfilled. JMP have reproduced these below and provided comment:

- *The site accords with national regional and local policies relevant to transport*

JMP have repeatedly demonstrated that the development is not compliant with national and local policy. Most importantly, the NPPF and the SMCS, as the site is not located in a location suitable for most sustainable forms of transport, nor do the measures suggested sufficiently address these shortcomings. Furthermore, the scale of proposed development is not considered appropriate to the rural nature of the road network or associated infrastructure.

- *The site is accessible by public transport, walking and cycling*

This has not been demonstrated in the TA nor is it correct in reality. This assertion is contradictory to the evidence provided within the TA and FTP, and as such, should be disregarded. Public transport provision is inadequate, both in level of service and accessibility from the site. Existing residential areas are too far away from the site and the existing infrastructure is too limited to support walking even with the proposed footway. There is virtually no cycle infrastructure and the roads are narrow and rural in nature, and not considered suitable for commuting cycling purposes.

- *The highway network is not subject to any defects that lead to an abnormally high accident rate*

JMP are unable to fully understand the extent of the accident data considered, as no accident mapping has been included in the TA. Without this information JMP are unable to accept the assumptions made within the TA.

It is also considered that the local road network in the vicinity of the site is not appropriate to accommodate additional HGVs, given the width of the existing carriageway and its constraints. As such, JMP are of the opinion that additional HGV movements on Cresswell Road / Sandon Road would have serious safety implications for vehicles, pedestrians and cyclists.

- *The levels of traffic associated with the proposals will not lead to a severe impact being caused to the operation and free-flow of the adjoining highway network.*

The TA uses an unrepresentative modal split as the basis of the trip generation figures presented and as a result the information provided is unacceptable. Furthermore, the trip distribution for the site is considered unrepresentative of what would actually happen. Traffic data has been collected in non-neutral months, which contravenes well-understood good practice and guidelines. Furthermore, measures suggested to reduce the reliance on private vehicles are inadequate and will not significantly mitigate traffic associated with the development proposals.

JMP's review of the submitted information has clearly demonstrated that the TA and FTP cannot be considered sound. Without a considerable investment in sustainable transport provision this site cannot be promoted as sustainable.

On the basis of this technical review JMP have clearly demonstrated that the fundamental suitability of the proposed development is unacceptable on transport grounds, is in a wholly unsuitable location for a development of this size, nature and trip generating characteristics, and would consider there to be appropriate grounds to reject the planning application on this basis.

Jonathan Parsons

Senior Transport Planner

Tel 0161 831 5619

Email jonathan.parsons@jmp.co.uk

cc Lindon Horleston
Jacquie Leach