

# 210667-01 Written Highways and Transportation Representations:

Planning Application: 22/01678/MOA - Land at Former Marsworth Airfield

## 1. Introduction and Background

### 1.1 Introduction

The Transportation Consultancy (ttc) have been appointed to provide an independent Transport and Highways review of a registered planning application (ref:22/01678/MOA) on land at the former Marsworth Airfield for the following quantum of development;

*“Outline Planning permission for demolition of existing buildings, structures and hardstanding to enable the erection of up to 320 residential (Use Class C3), a primary school, a local centre comprising community facilities (Use Class F2) and a rural enterprise hub (Use Class E) together with a transport mobility hub, public open space, drainage, landscaping and ancillary infrastructure. New vehicular and pedestrian access off Long Marston Road with all other matters (including other means of access) reserved.”*

This report includes a detailed review of the following Traffic and Transport elements associated with the application:

- Sustainability of the Site;
- Connectivity to Walking, Cycling and Public Transport Routes;
- Accessibility to local services and facilities;
- Traffic generation potential, including examination of trip rates;
- Site access general arrangement;
- Impact on the local highway network;
- National and local policy; and,
- Consultation responses issued by Local Highway Authority

This review has considered the content of the planning applications documents outlined in **Table 1.1** below.

**Table 1.1 Application documents considered**

Document	Authors	Date
Transport Assessment (TA)	Eddisons Transport Planning & Design (Croft)	April 2022
Framework Travel Plan (FTP)	Eddisons Transport Planning & Design (Croft)	April 2022

## 1.2 Planning History

The application site has been subject to several historical planning applications and planning appeals. With regards to the highways and transportation, the appeal decisions for the following two planning applications and subsequent appeals, are relevant to this particular planning application:

- Planning Application for 100 residential units in 1994 and dismissed at an appeal in June 1996 – *“due to the remoteness of the site from Marsworth and other sizeable settlements would be a cause of traffic generation on a level that would intrude upon the rural character of the area and be in conflict with the principles of sustainable development set out in national planning policy guidance”.*
- Planning Application for Change of Use of Units 20,21,22,23,24 and 30 and dismissed at an appeal in July 2008 – *“due to traffic impact on Lukes Lane and Long Marston Lane as a result of existing carriageway width and increase in HGV movements.”*

## 1.3 Consultation Responses

The planning application lies across the boundaries of two Local Highway Authorities (LHA), Buckinghamshire Council (BC) and Hertfordshire County Council (HCC). Both are a statutory consultee on the application and are yet to provide a formal response to the submitted application documents.

## 2. Assessment Criteria

### 2.1 Introduction

A Transport Assessment (TA) and Framework Travel Plan (FTP) was submitted as part of the planning application in April 2022.

A review of the TA and FTP has been prepared in accordance with the titles of the reports and summarised below in **Table 3.1**. Only sections of the TA and FTP relevant to the scope of this review (as summarised in **Section 1** of this report) have been included. The table includes a 'RAG' assessment (Red, Amber, Green) to categorise whether the item raised warrants further action, with the following assessment scale applied:

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

To determine the severity of the issues raised, due consideration has been given to the following National Planning Policy Framework (NPPF), last updated in July 2021, which ultimately establishes whether the severity of the issue would warrant sufficient merit to form a material objection to the application.

Key consideration has also been given the local policies which are relevant and outlined in Vale of Aylesbury Local Plan and the Dacorum Borough Core Strategy and the key policy paragraphs in this regard are outlined as follows.

#### National Planning Policy Framework Policy

The National Planning Policy Framework (NPPF) July 2021 at Section 9 sets out how to promote Sustainable Transport and sets out guidance on how local planning authorities should consider development proposals which ultimately establishes whether the severity of the issue would warrant sufficient merit to form a material objection to the application.

In assessing specific applications for development, the key paragraphs in NPPF are:

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

- *'Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- *Safe and suitable access to the Site can be achieved for all people; and*
- *Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.'*

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

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

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

- *'Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public*

*transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*

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

### **Vale of Aylesbury Local Plan (2013-2033)**

The Local Plan was adopted by Buckinghamshire Council in September 2021. The aim of the sustainable transport vision set out in the Local Plan is to assist with creating development that is accessible by different modes of transport, especially walking and cycling and the use of public transport which is essential to promoting sustainable development as it reduces car dependency.

There are several relevant Transport Policies set out in the Local Plan, most notably:

**Policy T1** *'Delivering the sustainable transport vision' states that: 'The strategy to deliver sustainable transport in Aylesbury Vale is based on encouraging modal shift with greater use of more sustainable forms of transport and improving the safety of all road users.'*

**Policy T5** titled *'Delivering transport in new developments' which states that: new development will only be permitted if the necessary mitigation is provided against any unacceptable transport impacts which arise directly from that development. This will be achieved, as appropriate, through:*

- a. The submission of a transport statement or assessment and the implementation of measures arising from it;*
- b. Ensuring that the scale of traffic generated by the proposal is appropriate for the function and standard of the roads serving the area;*
- c. The implementation of necessary works to the highway;*
- d. Contributions towards local public transport services and support for community transport initiatives;*
- e. The provision of new, and the improvement of existing, pedestrian and cycle routes; and*
- f. The provision of a travel plan to promote sustainable travel patterns for work and education related trips.*

### **Dacorum Borough Core Strategy (2006-2031)**

The Core Strategy was adopted in September 2013 and sets out the strategic vision, objectives and spatial strategy for the borough up to 2031. The relevant transport **Policy CS8** relates to sustainable transport and states:

- *'All new development will contribute to a well-connected and accessible transport system whose principles are to:*
- *give priority to the needs of other road and passenger transport users over the private car in the following order:*
  - a) *pedestrians;*
  - b) *cyclists;*
  - c) *passenger transport (buses, trains and taxis);*
  - d) *powered two wheeled vehicles;*
  - e) *other motor vehicles;*
- *ensure good access for people with disabilities;*
- *ensure passenger transport is integrated with movement on roads, footways and cycleways;*
- *create safer and continuous footpath and cycle networks, particularly in the towns;*
- *maintain and extend the rural rights of way network;*
- *improve road safety and air quality;*
- *strengthen links to and between key facilities (bus and railway stations, hospitals, main employers and town centres); and*
- *provide sufficient, safe and convenient parking based on car parking standards: the application of those standards will take account of the accessibility of the location, promoting economic development and regeneration, supporting shopping areas, safeguarding residential amenity and ensuring highway safety.*

## Local Transport Plans

The two aforementioned LHAs who are part of the consultation process and involved with the planning application, have produced Local Transport Plans for their respective areas, namely:

- *Buckinghamshire Local Transport Plan 2016-2036 (LTP4); and*
- *Hertfordshire Local Transport Plan 20128-2031 (LTP4).*

In respect of the Buckinghamshire LTP4, **Policy 10** *"Improving our Environment"* emphasises they *"will protect Buckinghamshire's unique countryside and other special environments, working with partners to manage air quality, take advantage of opportunities to encourage more sustainable travel choices and reduce noise pollution. We will do this through the transport investments we promote, by managing the impact of new development, by promoting the use of Travel Plans, and by working with business and researchers to develop lower emission technologies"*.

Regarding the Hertfordshire LTP4, **Policy 2** *"Influencing land use planning"* it states that *"the county council will encourage the location of new development in areas served by, or with the potential to be served by, high quality passenger transport facilities so they can form a real alternative to the car, and where key services can be accessed by walking and cycling."*

### 3. Appraisal

Table 3.1 sets out the observations of the review, with due regard to the key national and local policies outlined in Section 2.

Table 3.1 Review of submitted TA and FTP

Chapter Title	Subsection	Comment	RAG
Sustainable Modes	Walking	<p>With regard to walking, Section 5.2.12 within the TA identifies:</p> <p><i>“In summary, the distance of 1,950 metres, or around 2 kilometres, represents an acceptable maximum walking distance for the majority of land uses although clearly the DfE guidance for walking to school is up to 3.2 kilometres.”</i></p> <p>The TA is misleading as it discusses within the TA the term “acceptable maximum walking distance”, when it actually means “preferred maximum walking distance”, as reference at Tables 5.1 and 5.2. It should be noted that the preferred maximum walking distance refers to a point where one can expect very few people walking that distance to access facilities. The practicalities of using the preferred maximum walking distances to demonstrate the accessibility of the site is considered to be optimistic and unrealistic of the propensity for future residents to walk to certain facilities.</p> <p>This point is backed up by the CIHT “Planning for walking” dated April 2015, which at page 29 point 6.3 states (1A):</p> <p><i>“Most people will only walk if their destination is less than a mile away”</i></p> <p>Planning for Walking (2015) continues to note that:</p> <p><i>“Land use patterns most conducive to walking are thus mixed in use and resemble patchworks of “walkable neighbourhoods,” with a typical catchment of around 800 m or 10 minutes’ walk”.</i></p> <p>This is supported within Manual for Streets (MfS) guidance which reinforces this advice, stating that <i>“walkable neighbourhoods” should have a range of facilities within 800m (a 10-minute walk)</i>”.</p> <p>On the evidenced outlined, the walking catchments of 2.0 – 3.2km are extremely questionable and exaggerated in the context of the site location to make the site look more sustainable than it is.</p> <p>Planning for Walking (CIHT 2015, p.31) advises that:</p> <p><i>“The power of a destination determines how far people will walk to get to it. For bus stops in residential areas, 400m has traditionally been regarded as a cut-off point, in town centres, 200m. People will walk up to 800m to get to a railway station, which reflects the greater perceived quality or importance of rail services”.</i></p> <p>In light of the observations above, the walking distances and journey time to the local facilities identified within the TA at Section 5 have been recalculated in consideration of MfS ‘walkable neighbourhood’ and the CIHT document Providing Journeys on Foot (2000) which indicates that a walking distance of 400m is acceptable for trips to bus stops and local shops, with 800m being the preferred maximum.</p> <p>The corresponding walking distances for trips to work and school are given as 500m and 1,000m respectively. A preferred general maximum walking distance of 2,000m, where applicable, is identified.</p> <p>The above is considered to be far more reflective of acceptable walking distances and as a result of the above and in light of more appropriate guidance we have reviewed the walking distances to and from the proposed development site. These are set out in <b>Table 1</b>.</p>	

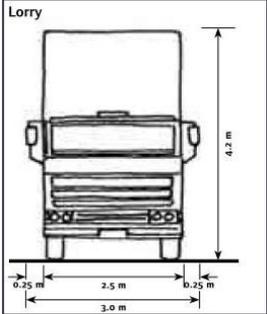
Chapter Title	Subsection	Comment	Walking Distances			RAG
Purpose	Destination	Distance (Km's)	Desirable	Acceptable	Preferred Maximum	
<b>Table 1 Walking Distances to Journey Destinations</b>						
Work/ Business	Bus stops*	0.77 km	Possibly depending on Section 106 Agreement			
	Cheddington Train Station	5.40 km	No	No	No	
	Tring Town Centre	5.50 km	No	No	No	
	Pitstone Green Business Park	3.90 km	No	No	No	
	Symmetry Business Park	5.87 km	No	No	No	
	Akeman Business Park	5.75 km	No	No	No	
Education	Marsworth CoE Infant School	1.61 km	No	No	Yes	
	Long Marston CoE School	1.75 km	No	No	Yes	
	Marsworth Pre School	1.89 km	No	No	Yes	
	Tring School	5.50 km	No	No	No	
	Aylesbury High School	10.00 km	No	No	No	
Leisure	Wilsone Village Hall	2.04 km	No	No	No	
	Red Lion Public House (PH)	1.34 km	No	No	No	
	Spirit Health and Fitness Club	9.00 km	No	No	No	
	Odeon Cinema Aylesbury	10.00 km	No	No	No	
	The Anglers Retreat PH	2.10 km	No	No	No	
	Waters Edge PH	1.90 km	No	No	No	
Personal Business	Rothchilds House Group Surgery	4.00 km	No	No	No	
	Windmill Pharmacy	4.64 km	No	No	No	
	Ivinghoe Post Office	4.68 km	No	No	No	
	High Street Bank [chain] (Aylesbury)	10.80 km	No	No	No	
	Harpenden Building Society	5.30 km	No	No	No	
Shopping	Mead's Farm Shop	3.00 km	No	No	No	
	Tesco's at Tring	5.50 km	No	No	No	
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		<p><b>Table 1</b> clearly indicates that the site is not well served by facilities or services that are within a walking distance. Education facilities identified within a preferred maximum are towards the upper distance. There are also no footpaths or dedicated pedestrian facilities to these facilities and therefore the likelihood of residents being attracted to walk to the facilities is extremely low.</p> <p><b>It can be concluded that the site does not benefit from services or facilities which can be accessed by foot which would contribute towards a sustainable development. As a result, the proposals are in breach of the NPPF paragraph 110 and 112 and policy T1 of the Aylesbury Vale Local Plan.</b></p>	Red																																																	
	Cycling	<p>Access to the proposed development site by cycle is seen by the applicant as an alternative mode of travel to the site, as set out in Section 5.3 of the TA.</p> <p>There are no surrounding dedicated cycle facilities to encourage cycling and notwithstanding the proposed widening on Lukes Lane the surrounding highway network is narrow and unlit.</p> <p>Within the CIHT document, Planning for Cycling, states:</p> <p><i>‘The majority of cycling trips are for short distances, with 80% being less than five miles and with 40% being less than two miles. However, many trips by all modes are also short distances (67% are less than five miles, and 38% are less than two miles); therefore, the bicycle is a potential mode for many of these trips (DfT, 2014a).’</i></p> <p>By using a commonly used industry standard of a distance of 5 miles (8km), which equates to a journey of around 40 minutes based on a leisurely cycle speed of 12 kilometres per hour, and as set out in the applicants TA, we have reviewed the cycling distances to and from the proposed development site. These are set out in <b>Table 2</b>.</p> <p><b>Table 2 - Cycling Distances to Journey Destinations</b></p> <table border="1"> <thead> <tr> <th>OPPORTUNITY</th> <th>Destination</th> <th>Distance (Km’s)</th> <th>Cycling Distance of 8 km</th> </tr> </thead> <tbody> <tr> <td rowspan="6">Work/Business</td> <td>Bus stops*</td> <td>0.77 km</td> <td>Yes</td> </tr> <tr> <td>Cheddington Train Station</td> <td>5.40 km</td> <td>Yes</td> </tr> <tr> <td>Tring Town Centre</td> <td>5.50 km</td> <td>Yes</td> </tr> <tr> <td>Pitstone Green Business Park</td> <td>3.90 km</td> <td>Yes</td> </tr> <tr> <td>Symmetry Business Park</td> <td>5.87 km</td> <td>Yes</td> </tr> <tr> <td>Akeman Business Park</td> <td>5.75 km</td> <td>Yes</td> </tr> <tr> <td rowspan="5">Education</td> <td>Marsworth CoE Infant School</td> <td>1.61 km</td> <td>Yes</td> </tr> <tr> <td>Long Marston CoE School</td> <td>1.75 km</td> <td>Yes</td> </tr> <tr> <td>Marsworth Pre School</td> <td>1.89 km</td> <td>Yes</td> </tr> <tr> <td>Tring School</td> <td>5.50 km</td> <td>Yes</td> </tr> <tr> <td>Aylesbury High School</td> <td>10.00 km</td> <td>No</td> </tr> <tr> <td rowspan="3">Leisure</td> <td>Wilsone Village Hall</td> <td>2.04 km</td> <td>Yes</td> </tr> <tr> <td>Red Lion Public House</td> <td>1.34 km</td> <td>Yes</td> </tr> <tr> <td>Spirit Health and Fitness Club</td> <td>9.00 km</td> <td>No</td> </tr> </tbody> </table>	OPPORTUNITY	Destination	Distance (Km’s)	Cycling Distance of 8 km	Work/Business	Bus stops*	0.77 km	Yes	Cheddington Train Station	5.40 km	Yes	Tring Town Centre	5.50 km	Yes	Pitstone Green Business Park	3.90 km	Yes	Symmetry Business Park	5.87 km	Yes	Akeman Business Park	5.75 km	Yes	Education	Marsworth CoE Infant School	1.61 km	Yes	Long Marston CoE School	1.75 km	Yes	Marsworth Pre School	1.89 km	Yes	Tring School	5.50 km	Yes	Aylesbury High School	10.00 km	No	Leisure	Wilsone Village Hall	2.04 km	Yes	Red Lion Public House	1.34 km	Yes	Spirit Health and Fitness Club	9.00 km	No	Yellow
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		<p>A 'RAG' type of assessment (Red, Amber, Green) to categorise whether the facility meets a cycling distance of 8 kilometres has been undertaken. The table shows that the proposed development site is within a reasonable cycling distance to services and facilities, apart from those located in Aylesbury.</p> <p>However, the highway network, does not have any dedicated cycle facilities (cycle lanes etc) to encourage and increase propensity to undertake cycle journeys, and will be mostly served via narrow country lanes and are not lit and therefore diminishing the attractiveness of cycling as an alternative means of travel by the private car to all but the hardy cyclist.</p> <p><b>It can be concluded that whilst services or facilities are situated within an 8 kilometres cycling catchment, the existing on-road routes to/from these services are not conducive to encourage cycling journeys, and therefore, the sustainable credentials of the site should be questioned. As a result, the proposals are in breach of the NPPF paragraph 110 and 112 and policy T1 of the Aylesbury Vale Local Plan.</b></p>																																							
Site Sustainability	Local Facilities and Services	<p>It has been demonstrated through the review of the walking and cycling sections of the TA that the proposed development is cited in a location which is poorly served by local services and facilities.</p> <p>Whilst it is noted that the proposals aim to provide some educational, retail and community facilities, it is questionable that these facilities will be suitable to cater for a 320-dwelling development.</p> <p>A wider level of services will be required to be access on a regular basis by the proposed residents and these services and facilities will only be able to be accessed regularly by reliance on a private vehicle.</p> <p><b>Therefore, it can be concluded that the lack of facilities and services within a desirable walking and cycling distance would create an unsustainable development and encourage journeys by car to access the facilities highlighted in Table 1. The reliance on car journeys to access such facilities</b></p>																																							

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		<p>would create an unsustainable development and would be in breach of the NPPF paragraph 110 and 112 and policy T1 of the Aylesbury Vale Local Plan.</p>	
Public Transport	Bus Services	<p>As part of the development proposals the applicant is proposing to improve the access arrangements to enable bus services to access the site to allow residents to be located within 400 metres of a bus route. In addition, the TA states that extensive discussions have been held with the Red Eagle Buses Ltd (who operate the No. 62/62A Bus service in the vicinity of the site) regarding improvements to bus service provision in the area.</p> <p>During these discussions it was agreed that the existing 62/62A bus service which currently operates between the Aylesbury town centre, Tring, Pitstone and Long Marston be diverted into the site. As part of the proposed extension and an additional weekday journey departing from Aylesbury Bus Station at 18:05 hours would be provided to further enable commuter trips by bus.</p> <p>Whilst this sounds like the site will be well served by the bus in the future it is in fact a very limited bus service as set out in the applicants TA, namely:</p> <p><i>“As can be seen in Table 5.7, the existing 62/62A service, with the proposed diversion would provide an hourly service Monday to Friday between the application site and the key employment locations of Aylesbury..... with journeys to Aylesbury and Tring taking around 45 and 25 minutes respectively.”</i></p> <p>In mode shift terms, an hourly service (starting in Marsworth at 07:35 and leaving Aylesbury at 18:05) and taking over half an hour is not considered adequate to attract commuters or shopping and leisure trips from the private car to the bus. As a result, it is difficult to accept the applicant’s assertion in the TA at section 5.4.5 that:</p> <p><i>“This will ensure the potential of a substantial reduction in private car travel between the site and Aylesbury,”</i></p> <p>Regarding the discussions between Red Eagle Buses Ltd. on the extension of the bus service into the site the following needs to be taken into account, namely:</p> <ul style="list-style-type: none"> <li>• the proposals to are not definite, as two options are discussed; firstly, diverting one AM (07:35) bus service into the site and one additional journey departing at 18:05 from Aylesbury Bus Station, and secondly for diverting all journeys into the site and one additional journey departing at 18:05 from Aylesbury Bus Station; and,</li> <li>• secondly the applicant will only subsidise the extended for 5 years after which time the service will be withdrawn if it is not profitable.</li> </ul> <p>The pertinent extracts casting doubt on the precise nature of the additional weekday service and what buses will, be diverted into the site is given at:</p> <p>Extract from the Letter received from Red Eagle Buses Ltd.</p>	

Chapter Title	Subsection	Comment	RAG
		<p>journeys which currently operates along Long Marston Road near the Airfield. We have been approached to provide the following two options:</p> <p><b>Option 1</b></p> <p>Divert one AM journey to Marsworth Airfield and operate one additional journey departing 1805 from Aylesbury Bus Station. Cost £94 per day Monday to Friday. £144 per Saturday operation.</p> <p><b>Option 2</b></p> <p>Additional journey departing 1805 from Aylesbury Bus Station and divert all other journeys to Marsworth Airfield. Cost £314 per day Monday to Friday.</p> <p>We feel the proposal ensures that the site is well served by public transport and based on current information available and experience, we hope the service would be self-sustaining after the 5 years funding ceases. A full review of this would be taken towards the end of the term.</p> <p>Whilst the developer highlights potential improvements to the bus service, the improvements outlined are not frequent or attractive to provide an alternative to private car journey to access employment, education and retail uses. Notwithstanding, the service would cease after 5 years if not considered profitable; therefore, the application cannot bind the bus operator to provide this service in perpetuity.</p> <p>As a result the site is poorly served by bus services which would encourage car use and make for a unsustainable site and therefore in breach of NPPF Paragraph 110 and T1 of the Aylesbury Vale Local Plan.</p>	
	Rail Service	<p>The nearest railway station to the proposed development is situated at Cheddington around 5.4 kilometres from the site. It is accessible by a short bus journey (approximately 10 minutes) followed by a short walk (15 minutes) from the bus stops at Cheddington Green to the railway station and offers 1 service an hour in each direction between Milton Keynes and London Euston, calling at stations such as Watford Junction, Leighton Buzzard and Hemel Hempstead.</p> <p>Whilst the TA states that the station provides opportunities for commuting/leisure from the site via rail, on closer examination this is far from the position. Service frequency for the bus and train to reach the rail station are very limited, with a bus every hour coupled with an hourly train service. In addition, the station has limited opening hours, Monday to Friday: 07:00 – 19:00 Saturday and Sunday: 08:00 – 16:00. Even with the extension of the bus service, whereby the earliest bus, plus the walk, will mean that a resident will not reach the rail station until around 08:15, meaning the first train available will reach London after 09:00.</p> <p>The other alternative is for residents to cycle to the rail station; however, this is not a particularly suitable option as the route is via narrow unsafe country roads which are not lit meaning the route will be dark during the early mornings outside the summer months.</p> <p>As a result, the potential for rail journeys without the use of a car is extremely low and does not provide good access to public transport facilities.</p>	
	Vehicle Access	<p>It is proposed that vehicular access into the site will be provided for via a new priority-controlled junction off Long Marston Road. To achieve the visibility standard at the junction, and as part of the vehicular access arrangements, it is proposed to reduce the speed limit on Long Marston Road in front of the site access from the existing 60mph to 30mph. Within the TA the applicant states that:</p>	

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		<p><i>“The details of this will be agreed with the local highway authority at a more advanced stage of the planning process, but this could include the provision of a gateway feature and additional traffic calming measures.”</i></p> <p>Furthermore, Plan 3 reveals that;</p> <p><i>“This is not a construction drawing and is for indicative purposes only. The drawing will be subject to change following local authority review and confirmation of public highway and third-party land boundaries.”</i></p> <p>The exact nature of the access proposals has not been fixed and therefore it has not been confirmed that the scheme can deliver a ‘safe and secure’ access. Indeed, there is no guarantee that the reduction of the speed limit to 30mph can also be achieved, as it would need to go through the Traffic Regulation Order (TRO) process, which is subject to a public consultation and outside the control of the applicant.</p> <p>Achieving access is a key consideration of any development and within the planning application process and needs clear indication of its form, nature, accords with standards and deliverability at this stage of the planning process.</p> <p>As part of the applicants’ proposals there are proposals for widening to provide for a 6-metre carriageway for the entirety of Lukes Lane/Long Marston Way between the application site and the Wingrave Lane junction, apart from a short section of carriageway adjacent to properties Nos. 7 and 8 Lukes Lane, which provide a priority “give-way” arrangement. Again, the proposals are shown in the applicants TA at Plan 3 and can only be seen as indicative as stated above.</p> <p>The TA justifies the 6-metre width by referring to the Manual for Streets (MfS) document and in particular Figure 3.1 which shows that a carriageway width of 6 metres is more than sufficient to allow a car and HGV to pass safely. The extract (Figure 3.1) from MfS is not a recommendation and only guidance, in fact the true width of a HGV is 3.0m to allow for wing mirrors, as shown in the illustration opposite and taken from Figure 6.18 from MfS. If two HGV’s pass, then an absolute minimum of 6.0 metres is required and not the 5.5 meters as shown in Figure 3.1. Even at 6 metres two HGV’s will find it difficult to pass each other without either hitting a pedestrian/cyclist with a wing mirror or mounting the pavement to pass thus creating a safety issue.</p>  <p>It should be noted that both Long Marston Road and Vicarage Road south of the application site are still the original road width, which are 5.5 metres or less, thus still creating a safety hazard to passing traffic as stated above.</p> <p>At section 3.2.10 of the TA it states that:</p> <p><i>“The proposed improvements can be subject to a Stage 1 Road Safety Audit once the principle has been agreed with the local highway authority.”</i></p> <p>The road widening has not been the subject of a Road Safety Audit (RSA) and when considered against transport policies how can a decision on the planning application be made if it has not been seen to be safe and deliverable.</p> <p>It is not clear that a Stage 1 Road Safety Assessment has been provided for the proposed access point and highway improvements to the proposed residential development. Furthermore, the CIHT Guidance on Road Safety Audits recommends in the Executive summary that:</p> <p><i>“local highway authorities should ensure that developers submit a Road Safety Audit and/or Road Safety Assessment with their Transport Assessment or Design and Access Statement as</i></p>	

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		<p><i>part of the planning application, and that this road safety input is reviewed by all relevant officers within the planning and highway authorities”.</i></p> <p><b>In order to be compliant with both the NPPF, Vale of Aylesbury Local Plan policy T5 and Dacorum Borough Core Strategy policy CS8, we would have thought that these audits should have been undertaken.</b></p> <p><b>It is important therefore that the decision makers (local planning/highway authority and its planning committee members) need to be completely satisfied that the proposed means of access can be delivered, and that it is safe and suitable for all users. The lack of access arrangements is in breach of NPPF Paragraph 110, which outlines the requirement for safe and suitable access.</b></p>	
Sustainable Access Arrangements	Pedestrian Access	<p>In order to facilitate safe pedestrian movements to and from Marsworth to the southeast, the applicant is proposing to provide improvements to the existing pedestrian infrastructure on Long Marston Road and Vicarage Road. As part of these pedestrian improvements, a footway with a width of a minimum of 1.5 metres will be provided on at least one side of the Long Marston Road and Vicarage Road carriageway. The TA states that these improvements can be provided within the extent of adopted highway, however as indicated on Plan 3 within the TA this is not the case and as already indicated the plan states that:</p> <p><i>“Developers legal team to confirm exact highway boundary.” and “This is not a construction drawing and is for indicative purposes only. The drawing will be subject to change following local authority review and confirmation of public highway and third-party land boundaries.</i></p> <p>The TA, at section 3.3.5, appears to indicate that a footway width of 1.5 metres is acceptable as it can accommodate a parent and child or parent and pushchair, as indicated at Figure 3.2 of the TA. Figure 3.2 is an extract from MfS Table 6.8 which is an illustration not a standard. In fact, MFS clearly states that at section 6.3.22 that:</p> <p><i>“There is no maximum width for footways. In lightly used streets (such as those with a purely residential function), the minimum unobstructed width for pedestrians should generally be 2 m.”</i></p> <p>It is clear that a pedestrian footway at 1.5 m is below that considered safe by MfS. In addition, there is no RSA accompanying the footway provision proposals to enable a review of the safety of the proposals given that there are sections of Vicarage Road where a footpath cannot be provided or are less than 1.5 meters.</p> <p>Overall, the footpath width is not to a required standard which can be considered safe, there is no clear indication that it is safe or indeed can be delivered within the existing public highway safely.</p>	
	Cycle Access	<p>Cycle access into the site is to be provided for via the proposed vehicular access off Long Marston Road or the car free access off Lukes Lane. Links to the wider highway network are via Long Marston Road and Lukes Lane.</p> <p>Apart from the proposed 710 metre widening of Long Marston Road and Lukes Lane the surrounding highway network is between 5.5 metres and 4.6 metres (as indicated at Plan 3 within the TA) and will do nothing to enhance cycle safety on the surrounding highway network. Indeed, the width of the highway at the canal bridge on Vicarage Road in Marsworth is only 3.0 metres.</p> <p>The applicant appears to justify a safe cycle access to the proposed residential site via the existing highway network by referring to revised Highway Code and that the new rules will make cyclists feel safer using the road network and further encourage travel by cycle. This is a sweeping assumption to make as the roads are still narrow and an unsafe environment for cyclist, this is backed up by the</p>	

Chapter Title	Subsection	Comment	RAG
		<p>latest official data from the Department for Transport (DfT) which reports that more cyclists died on rural roads, where 89 (63% of all fatalities) people losing their lives last year were in the countryside.</p>	
Travel Plan	Car Clubs	<p>Car clubs are a particular measure which is promoted as part of the Travel Plan to increase the sustainability of the site. The TA includes for detailed discussions with the Co Wheels Car Club company and a draft Section 106 appended to the TA. It should be noted that the Co Wheels Car Club state that:</p> <p><i>“We have carried out an initial assessment of the area around the development and while the location does not offer significant car club potential (ttc emphasis) Co Wheels would be happy to work to work with the developer to provide car club vehicles as part of the mobility hub”</i></p> <p>The document goes on to say that:</p> <p><i>“The intention is that at the end of the initial three year period that the cars have a proven to be financially sustainable at which point we would continue deploying vehicles at no additional cost to the developer, however given the uncertainty around this site it may be that a longer commitment would be required (ttc emphasis) ....”</i></p> <p>It appears that there are doubts about the success of a Car Club at this location which will encourage private car usage and reliance.</p>	

## 4. Summary and Conclusions

### 4.1 Summary

'ttc' have been appointed to provide an independent review of the transport and highways documentation which has been submitted as part of application 22/01678/MOA for proposals for land at the former Marsworth Airfield.

Following a detailed review of the Transport Assessment and Framework Travel Plan, the followings findings were made:

- There is a history of refusing planning applications on the proposed development site due to the impact resulting from the additional traffic on the local highway network.
- An assessment of walking distances to the nearest local amenities, services and employment areas have found that they are in excess of preferred maximum distances and as such, in walking terms, the development site cannot be considered sustainable.
- Whilst the proposed development site is within a reasonable cycling distance to services and facilities, the highway network, which will be used as cycle routes, does not have any dedicated facilities (cycle lanes etc) to encourage cycling, are via narrow country lanes and are not lit. The lack of a route conducive to cycling diminishes the attractiveness of cycling as an alternative means of travel.
- The nearest bus stops to the development site are located beyond an acceptable walking distance and along narrow country lanes. Whilst there are proposals to extend the adjacent bus service into the development site the proposed bus service level of operation is not considered sufficient to guarantee an adequate shift from the private car to the bus to ensure that the site is sustainable in transport terms.
- Due to the remoteness of the nearest railway station the potential for rail to attract potential residents to travel in a sustainable way is very limited.
- There appears to be doubts about the long-term success of a Car Club and that a longer commitment may well be required. There needs to be a clear long-term commitment by the applicant to ensure that the car club is in situ and the decision maker can be certain that there is a long-term feasibility of the site becoming sustainable.
- Access arrangements are not considered appropriate to provide the confidence that safe and suitable access can be achieved. Access arrangements from Long Marston Road are reliant on a change of speed limit, which in itself is outside of the applicant's control. As a result, it has not been demonstrated that access can be provided.

### 4.2 Conclusion

As a result of the evidence presented above it can be concluded that the transport documents submitted by the applicant fall significantly short of the required standard to support the proposals and are in breach of both a number of national and local planning policies.

The lack of detailed access arrangements provided and reliance on delivering a change in speed limit to achieve the required visibility is a requirement which is outside the control of the applicant and therefore

undeliverable. Which fails to demonstrate safe and suitable access can be achieved and is in breach of Paragraph 110.

The site can be considered unsustainable and should the development come forward would only serve to promote car journeys. The citing of the proposed development falls short of the requirement set out in Paragraph 112 of the NPPG and Policy T1 and T5 of the Aylesbury Vale Local Plan.

Considering these key elements, it has therefore been demonstrated that the cumulative impacts of the development would constitute to a severe impact on the local highway network and as a result we find it hard to understand how the proposed development could be granted planning permission in its current state.

### **Third party disclaimer**

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