

210667-01 Written Highways and Transportation Representations:

Planning Application: 23/01594/AOP Marsworth Airfield, South Site, Long Marston, Marsworth, Buckinghamshire

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:23/01678/AOP) 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;
- Road Safety Audit Stage 1
- Impact on the local highway network and capacity study
- National and local policy; and,
- Planning History of the site.

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)	May 2023

1.2 Planning History

The application site has been subject to several historical planning applications and planning appeals. The table below illustrated the recent planning history.

Table 1.2 Application Planning History

Application Ref	Description	Decision	Highways Response
22/02189/AOP	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 reserved.	Withdrawn	The Local highway authority provided a series of robust reasons for refusal before the application was withdrawn. These reasons can be summarised as the following; <ol style="list-style-type: none"> 1. Insufficient information submitted to enable the highways & traffic impact to be fully assessed. 2. Local network is inadequate in terms of width, alignment and visibility 3. Inadequate provision of a footway between application site and surrounding area 4. Sustainability
06/02691/APP	Change of use of agricultural and storage buildings to use as builders yard including the storage of builders materials.	Refused and dismissed at appeal	<i>"due to traffic impact on Lukes Lane and Long Marston Lane as a result of existing carriageway width and increase in HGV movements."</i>
94/00041/AOP	100 Residential dwellings affordable housing recreation use and public open space.	Refused and dismissed at appeal	<i>"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".</i>
89/01297/AOP	Residential Development comprising of 155 dwellings	Refused	<i>"the highway serving the site is inadequate by reason of its width, lack of continual footways and restricted visibilities."</i>

It is clear from **Table 1.2** that there is a clear precedent set where by development on the proposed development site has been refused. The full response from LHA is provided in **Appendix A** which sets out in full the reasons for refusal before the 22/02189/AOP application was withdrawn.

Given that the quantum of development for that application and the newly submitted application is the same, reference to the reasons for refusal are relevant to this review.

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 May 2023.

A review of the TA has been prepared in accordance with the titles of the reports and summarised below in **Table 3.1**. Only sections of the TA 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 2012-2031 (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 Table 1.</p>	

Chapter Title	Subsection	Comment	RAG																																																																																																																																																	
		<table><tr><th colspan="6">Table 1 Walking Distances to Journey Destinations</th></tr><tr><th rowspan="2">Purpose</th><th rowspan="2">Destination</th><th rowspan="2">Distance (Km's)</th><th colspan="3">Walking Distances</th></tr><tr><th>Desirable</th><th>Acceptable</th><th>Preferred Maximum</th></tr><tr><td rowspan="6">Work/ Business</td><td>Bus stops*</td><td>0.77 km</td><td colspan="3">Possibly depending on Section 106 Agreement</td></tr><tr><td>Cheddington Train Station</td><td>5.40 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td>Tring Town Centre</td><td>5.50 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td>Pitstone Green Business Park</td><td>3.90 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td>Symmetry Business Park</td><td>5.87 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td>Akeman Business Park</td><td>5.75 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td rowspan="5">Education</td><td>Marsworth CoE Infant School</td><td>1.61 km</td><td>No</td><td>No</td><td>Yes</td></tr><tr><td>Long Marston CoE School</td><td>1.75 km</td><td>No</td><td>No</td><td>Yes</td></tr><tr><td>Marsworth Pre School</td><td>1.89 km</td><td>No</td><td>No</td><td>Yes</td></tr><tr><td>Tring School</td><td>5.50 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td>Aylesbury High School</td><td>10.00 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td rowspan="6">Leisure</td><td>Wilsone Village Hall</td><td>2.04 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td>Red Lion Public House (PH)</td><td>1.34 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td>Spirit Health and Fitness Club</td><td>9.00 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td>Odeon Cinema Aylesbury</td><td>10.00 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td>The Anglers Retreat PH</td><td>2.10 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td>Waters Edge PH</td><td>1.90 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td rowspan="5">Personal Business</td><td>Rothchilds House Group Surgery</td><td>4.00 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td>Windmill Pharmacy</td><td>4.64 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td>Ivinghoe Post Office</td><td>4.68 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td>High Street Bank [chain] (Aylesbury)</td><td>10.80 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td>Harpenden Building Society</td><td>5.30 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td rowspan="3">Shopping</td><td>Mead's Farm Shop</td><td>3.00 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td>Tesco's at Tring</td><td>5.50 km</td><td>No</td><td>No</td><td>No</td></tr><tr><td>Masons Stores at Pitstone</td><td>3.90 km</td><td>No</td><td>No</td><td>No</td></tr></table>	Table 1 Walking Distances to Journey Destinations						Purpose	Destination	Distance (Km's)	Walking Distances			Desirable	Acceptable	Preferred Maximum	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	Masons Stores at Pitstone	3.90 km	No	No	No	
Table 1 Walking Distances to Journey Destinations																																																																																																																																																				
Purpose	Destination	Distance (Km's)	Walking Distances																																																																																																																																																	
			Desirable	Acceptable	Preferred Maximum																																																																																																																																															
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																																																																																																																																															
	Masons Stores at Pitstone	3.90 km	No	No	No																																																																																																																																															

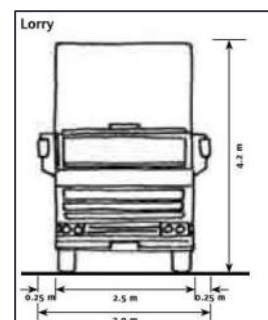
Chapter Title	Subsection	Comment	RAG																																																	
		<p>Table 1 clearly indicates that the site is not well served by facilities or services that are within a walking distance. Education facilities identified within a preferred maximum are towards the upper distance. 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>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.</p>																																																		
	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 Table 2.</p> <p>Table 2 - Cycling Distances to Journey Destinations</p> <table> <tr> <th>OPPORTUNITY</th><th>Destination</th><th>Distance (Km’s)</th><th>Cycling Distance of 8 km</th></tr> <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> </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	
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																																																	

Chapter Title	Subsection	Comment				RAG
			Odeon Cinema Aylesbury	10.00 km	No	
			The Anglers Retreat PH	2.10 km	Yes	
			Waters Edge PH	1.90 km	Yes	
		Personal Business	Rothchilds House Group Surgery	4.00 km	Yes	
			Windmill Pharmacy	4.64 km	Yes	
			Ivinghoe Post Office	4.68 km	Yes	
			High Street Bank [chain] (Aylesbury)	10.80 km	No	
			Harpenden Building Society	5.30 km	Yes	
		Shopping	Mead’s Farm Shop	3.00 km	Yes	
			Tesco’s at Tring	5.50 km	Yes	
			Masons Stores at Pitstone	3.90 km	Yes	
<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>Given the constrained nature of the surrounding local highway network, it is extremely difficult to see how the applicant could improve cycling provision to support the development.</p> <p><u>Use of Strava Heat Map</u></p> <p>The applicant presents additional information in the form of a Strava ‘Global Heat Map’ consisting of aggregated data from public activities over the last year, to support the sites conduciveness to cycle journeys on surrounding roads. Strava is generally used by ‘athletes’ or keen enthusiasts therefore, to present this as evidence to support claims that the site is surrounded by roads extensively used by residents, visitors and employees is misleading and is trying to depict that the site is more sustainable than it actually is.</p> <p>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.</p>						

Chapter Title	Subsection	Comment	RAG
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 and residents will be forced to travel off site by a private vehicle to access key services and facilities.</p> <p>A point which was raised by 'ttc' on the previous planning application and confirmed by the LHA in their consultation response before the application was withdrawn, namely; <i>"The location of the site is such that it has only limited access by non-car modes of travel. The absence of adequate infrastructure and the sites remoteness from major built up areas is such that it is likely to be reliant on the use of the private car contrary to local and national transport policy. The development is therefore contrary to the National Planning Policy Framework, Buckinghamshire Council Local Transport Plan 4 (adopted April 2016) and the Buckinghamshire Council Highways Development Management Guidance document (adopted July 2018)."</i></p> <p>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 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"> 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, 	

Chapter Title	Subsection	Comment	RAG
		<ul style="list-style-type: none"> secondly the applicant will only subsidise the extended for 5 years after which time the service will be withdrawn if it is not profitable. <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> <div data-bbox="379 524 1426 994" style="border: 1px solid black; padding: 5px;"> <p>journeys which currently operates along Long Marston Road near the Airfield. We have been approached to provide the following two options:</p> <p>Option 1</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>Option 2</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> </div> <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>	

Chapter Title	Subsection	Comment	RAG
	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, with the incorporation of a ghost island right turn facility.</p> <p>Newly provided traffic speed data has been provided by the consultants and they have confirmed that the visibility can be achieved for the new access road.</p> <p>However, the proposals still propose 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> <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>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.</p> <p>It should be noted that as part of the LHAs response on the previous application made regarding the priority give way;</p> <p><i>“This proposed widening has not been shown with appropriate verges and concern is raised with the feasibility of implementing the proposed road widening scheme. I note that lighting is also proposed to be implemented as well as continuous centre carriageway lines. All these proposed changes raise concern that the road widening will significantly change the rural nature of Lukes Lane/Long Marston Road, contrary to policy 5(g) of HCCs LTP4.”</i></p> <p>The applicant has not suggested any further details since the previous application on the priority give way and therefore the objection still stands.</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>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</p>	



Chapter Title	Subsection	Comment	RAG
		<p>arrangements is in breach of NPPF Paragraph 110, which outlines the requirement for safe and suitable access.</p> <p>In order to be compliant with both the NPPF, Vale of Aylesbury Local Plan policy T5 and Dacorum Borough Core Strategy policy CS8,</p>	
	Road Safety Audit	<p>The applicant has undertaken a Stage 1 Road Safety Audit, which includes proposed access to the site and the road widening including for the priority give way.</p> <p>A number of issues have been raised as part of the RSA including issues with the give way priority section which confirms the issued raised by the LHA. Issues are also raised with the width of the carriageway at the points of the priority give way. The recommendations are to increase the width.</p> <p>The applicant notes that the 10 issues raised as part of the Road Safety Audit, the majority relating to inter visibility and unsuitable carriageway width resulting in Highway Safety issues.</p> <p>The issues relating to highway safety which have been raised by both 'ttc' and the LHA have been confirmed by an independent review of the designs. It is therefore confirmed that the proposal would have an unacceptable impact on highway safety as confirmed by the RSA.</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. This point also has been noticed by the LHA, whereby in their response to the previous withdrawn application;</p> <p><i>"There seems to be uncertainty over how successful the Car Club will be and doubts over how long the scheme will take to become sustainable. I am not convinced that this can be seen as a viable alternative to the private car in this location."</i></p> <p>Without a sufficient sustainable strategy to deter car usage and promote sustainable transport, the development will not be a sustainable one and therefore contrary to NPPF.</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 23/01678/AOP for proposals at the former Marsworth Airfield.

Following a detailed review of the Transport Assessment dated April 2022, 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 and the inadequacy of the surrounding local highway network to accommodate an increase in traffic associated with the development safely.
- 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.
- 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.
- 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.
- The improvements outlined to the local highway network have been rejected by LHA as part of the previous planning application.
- A road safety audit has been undertaken which confirms the concerns raised on the access points and the widening proposed are not compliant and will lead to a significant increase in highway safety.
- There appears to be doubts about the long-term success of a Car Club and that a longer commitment may well be required and the other measures provided in the Travel Plan. The site is unsustainable and therefore it is likely that only private car journeys to access the site will be deemed appropriate.

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 issues surrounding the access and improvements to the local highway network have been clearly highlighted. These issues have been confirmed by the LHA and also through an independent Road Safety Audit. 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

Any disclosure of this report to a third party is subject to this disclaimer. The report was prepared by TTC at the instruction of, and for use by, our client named on the front of the report. It does not in any way constitute advice to any third party who is able to access it by any means. TTC excludes to the fullest extent lawfully permitted all liability whatsoever for any loss or damage howsoever arising from reliance on the contents of this report. We do not however exclude our liability (if any) for personal injury or death resulting from our negligence, for fraud or any other matter in relation to which we cannot legally exclude liability.



Directorate for Planning Growth & Sustainability
Buckinghamshire Council,
Walton Street Offices,
Walton Street,
Aylesbury
HP20 1UA

highwaysdm.av@buckinghamshire.gov.uk
01296 382416
www.buckinghamshire.gov.uk

Development Management
(North and Central Area)
Planning, Growth & Sustainability
Buckinghamshire Council

26th August 2022

F.A.O. Zenab Hearn

Dear Zenab,

Application Number: 22/02189/AOP
Proposal: 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.
Location: Marsworth Airfield South Site, Long Marston Road, Marsworth, Buckinghamshire

Thank you for your consultation dated the 28th of June 2022 with regard to the above planning application.

The applicant has submitted an outline planning application for the 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. It should be noted that this planning application will solely deal with new vehicular and pedestrian access off Long Marston Road and all other matters including other means of access are reserved. The following highway comments will therefore assess the traffic impacts, access arrangements and highway safety, and the accessibility and sustainability of the proposed development, and set out the planning history of the site.

Planning History

I note that this site has been subject to an extensive planning history. For example, planning appeal ref. 94/00003/REF for 100 residential dwellings was dismissed by the Inspector for the lack of a continuous footway between the site and Marsworth village. The highways section can be read below:

"As regards highway matters, the Secretary of State notes that the roads in the vicinity of the appeal site tend to be irregularly aligned and narrow in places. He agrees with the Inspector that, although the additional traffic would have a harmful effect on the rural character of the area, there would not be a serious and unacceptable risk to highway safety. However, he gives greater weight than the Inspector with regard to the degree of importance to be attached to the lack of a continuous footway on the road between the appeal site and Marsworth village. Given the remoteness of the appeal site from existing settlements and services, he considers that this is a factor which would militate against the Government's policy that developments should be sustainable and that reliance on the private motor car should be reduced and serves to reinforce the Inspector's overall view in paragraph 11.24 of his report that the appeal proposals would in conflict with the principles of sustainable development."

In terms of the impact of the proposed traffic-light system on the listed bridge at Marsworth, the Secretary of State accepts the Inspector's view that the proposal would not impinge unacceptably on the setting of the listed building."

Furthermore, planning appeal ref. 07/00047/NONDET for the change of use of agricultural and storage buildings to use as builders yard including the storage of builder's materials was also dismissed by the Inspector. There were a range of reasons including but not limited to concerns with large commercial vehicles and cars utilising the narrow and winding Lukes Lane and concerns with use of the Red Lion Bridge when vehicles are to pass through Marsworth. The Inspector's full thoughts can be found below:

"32. To arrive at the airfield entrance, vehicles must use Long Marston Road, and Lukes Lane if travelling from the west. Outside Marsworth and Gubblecote, this stretch of highway has a speed limit of 60 miles per hour. Many parts of it, in both directions, are narrow and winding, with bends where forward visibility is limited by hedgerows, and where large vehicles in particular would require most of the carriageway width. In addition, to the west, parts of Lukes Lane narrow to below the 4.8 metres Manual for Streets shows is needed for a commercial vehicle and car to pass. Its junction with Wingrave Road and Tring Road has poor visibility, particularly to the left, and the limited exit radius would require large vehicles to use the full road width to turn. Furthermore, to the east, the limited width of the Red Lion Bridge in Marsworth restricts traffic to single file. Its steep gradient on the western approach, along with the limited forward visibility, poses a risk of accidents occurring and the possibility of large vehicles grounding. Combined with the bridge's weight restriction of 17 tonnes, these factors increase the likelihood of larger vehicles using the narrower route along Lukes Lane.

33. For all these reasons, I have concerns about the effect of the proposed developments on highway safety. With the exception of appeals C and D, it seems likely to me that they would result in movements by HGVs or large commercial vehicles, which would unavoidably use Lukes Lane and / or Long Marston Road. In my opinion, even a generally low level of trips by large vehicles would give rise to an unacceptable degree of risk to highway users' safety, including the occupiers of those properties that front directly onto Lukes Lane. This would be compounded by the increase in other vehicle journeys the proposals would lead to, from employees coming to and leaving work, and undertaking normal business activities. In particular, although limited in number, the appellant estimates the appeal E proposals would generate 200 to 300 traffic movements on auction days, with further trips on the two viewing Appeal Decisions APP/J0405/A/07/2047161, APP/J0405/A/07/2047201, APP/J0405/A/07/2047211, APP/J0405/A/07/2047219, APP/J0405/A/07/2047223 and APP/J0405/A/07/2047616 7 days and two collection days associated with each auction. In my view, this volume would worsen the highway safety situation significantly, even if all these journeys were by car, and not larger vehicles.

34. I therefore conclude that the developments proposed in appeals A, B, E and F would be harmful to highway safety. This would conflict with the aims of Planning Policy Guidance Note 13: Transport, which seeks to ensure that jobs are located in places that offer realistic, safe and easy access."

The Highway Authority has also objected to subsequent applications on this site. For example, the Highway Authority objected to planning application 13/02632/APP which was for the change of use, refurbishment of existing retained buildings from agricultural storage and vehicle storage to B1 use (Business). The reasons for refusal were that the local highway network that serves the site is inadequate by reasons of its width, alignment, visibility and construction to serve the proposed development with safety and convenience and that the proposed development would result in an intensification of use of an existing access at a point where visibility is substandard. My colleague made the following comments on that application:

"The site is accessed from Long Marston Lane, which at this point is subject to the national speed limit of 60mph. Vehicles wishing to access the site from the east would have to do so through the Village of Marsworth where roads are narrow and winding with bends where forward visibility is restricted. The bridge by the Red Lion Pub in Marsworth is restricted in width and will only allow one vehicle to pass over it at any one time. The gradient of the bridge also restricts forward visibility; therefore an increase of movements over the bridge would be detrimental to Highway safety.

Vehicles wishing to access the site from the west would do so through Gubblecote along Lukes Lane where parts of the carriageway are below 4.8 metres in width which is the minimum width required for a commercial vehicle and a car to pass. The junction where Lukes Lane meets Tring Road and Wingrave Road has poor visibility to the south with the alignment of the junction resulting in larger vehicles having to use the full road width to turn.

The submitted information states that under the current legal use there could be up-to 50 daily HGV movements, however I am unsure whether this number relates to single trips or two way trips. Having consulted the TRICS (Trip Rate Information Computer System) database for a variety of activities which could legally operate under the B1 use class I would estimate that a development of this size would have the potential to generate in the region of 560 daily two-way vehicle trips. Whilst I do take note of the unsuitability of the surrounding highway network to accommodate the HGV movements associated with the existing use, ultimately the significant increase in vehicular movements, that could potentially occur should planning permission be granted, would be deemed more detrimental from a highway perspective.”

Traffic Impact Analysis

The applicant states that weekday AM and PM peaks will have the biggest impact on the highway network, and I concur with this. As the development is aiming for completion by 2029, I consider it reasonable that the applicant has assessed the traffic impact for 2030.

In order to establish current levels of traffic, full turning count surveys were undertaken at four junctions on Wednesday 23rd June 2021. Whilst it is acknowledged that the surveys were undertaken within a neutral period of school term times and outside of any periods of Covid National Lockdown restrictions, I would have expected the surveys to have been carried out for more than one day. The applicant should provide further explanation and evidence as to the robustness of the survey data on which the traffic impact assessment is based.

The traffic count surveys were undertaken at the following junctions and I satisfied with these locations:

- Site Access / Long Marston Road Priority Junction;
- Tring Road / Lukes Lane / Wingrave Road Priority Junction;
- B489 Lower Icknield Way / Vicarage Road Priority Junction;
- B489 Lower Icknield Way / Tringford Road / Wingrave Road Roundabout Junction.

The applicant states that the future year flows have been calculated by: *“National Traffic Model (NTM) factors adjusted by the TEMPro regional and local growth factors. The application site falls with the Middle Super Output Areas (MSOA) of Vale of Aylesbury 003 and Dacorum 002. However, for the purposes of this analysis the Vale of Aylesbury growth factors have been used as these are higher than those forecast for Dacorum 002.*

The resulting growth factors are as follows:

- 2019 to 2030 AM Peak – 1.1061
- 2019 to 2030 PM Peak – 1.1148

I would like the applicant to clarify why the traffic surveys in the Appendix are from 2021 and why the growth factors have been taken from 2019. I would also like the applicant to clarify the extent of MSOA Vale of Aylesbury 003 and clarify how they have calculated the above growth factors.

The applicant has considered nearby committed developments and has factored them into their operational assessment. One of the sites that has been considered is in Pitstone, Buckinghamshire for a residential development of 74 dwellings with leisure facilities and the other is in Tring, Hertfordshire and is a residential development of 226 dwellings with employment space, cemetery extension and public open space. I am satisfied with the two sites that have been considered and reference has been made to the submitted TA and committed development flows have been assigned to the study area as per observed turning proportions. Considering both traffic growth and committed development provides a robust assessment of the likely cumulative traffic impact.

The applicant has calculated the 2030 future year traffic flows by adding the 2030 growthed flows to the committed development flows.

The applicant has used census data to determine the destination of residents travelling by car and the applicant has determined the likely routes to get to these destinations by using route planning software. I am satisfied with this approach. The applicant determined that 43% of trips would be distributed down Tringford Road, 29% of trips would be distributed down Lower Icknield Way West, 13% of trips would be distributed down Lower Icknield Way East and 15% would be distributed down Tring Road. Given that the census data shows that the majority of trips would be headed towards Aylesbury Town Centre and Tring, I consider that this distribution is reasonable. The applicant has shown that 87% of the new trips would head into Hertfordshire to the west and 13% of trips would head through Marsworth to the east, this is displayed on Figure 11 which shows the proposed trip distributions in the AM and PM peaks. The trips heading into Buckinghamshire to the east are lower than those going through Hertfordshire however still represent an increase in vehicular movements and I will investigate their impact on highway safety in the section below.

The applicant has calculated the trip rates for 337 residential dwellings in the AM and PM peaks and having assessed the TRICS output in Appendix 6, I am satisfied with these trip rates. The residential development would generate 165 trips during the AM peak hour and 181 trips during the PM peak hour. Whilst I do appreciate that some of the non-residential trips may well be internal, residents of other nearby villages are likely to utilise these facilities and there will be a degree of external trip generation. I would therefore like the applicant to show the trip rates for the non-residential uses during the peak hours and to factor these rates into the junction capacity assessments.

The applicant has undertaken junction capacity assessments at the following junctions:

- Site Access / Long Marston Road Priority Junction;
- Tring Road / Lukes Lane / Wingrave Road Priority Junction;
- B489 Lower Icknield Way / Vicarage Road Priority Junction;
- B489 Lower Icknield Way / Tringford Road / Wingrave Road Roundabout Junction.

The applicant has combined the 2030 future year flows with the development flows to determine the capacity assessment. I would also like to know whether the applicant has taken account of the traffic associated with the existing permitted uses in their traffic assessment. It is stated in the Transport Assessment that the trip generation of the existing permitted uses will be discussed further in section 7 of the report however this was not discussed in this section. The junctions that are in Buckinghamshire are the Site Access / Long Marston Road priority junction and the B489 Lower Icknield Way / Vicarage Road priority-controlled junction and I will be solely assessing these junctions. The other junctions reside in Hertfordshire, and I will leave these to be assessed by Hertfordshire County Council.

As stated above, I will only assess the junction capacity assessments when the non-residential trip rates have been factored into this assessment.

Vehicular Access / Highway Safety

The site is located off Long Marston Road which is an unclassified road subject to a 60mph speed limit. A new access is proposed in the form of a new priority junction from Long Marston Road and the new site access will be centralised. The applicant intends to reduce the speed limit of Long Marston Road / Lukes Lane from 60mph down to 30mph, however any road speed changes would be subject to statutory public consultation, and Thames Valley Police and Buckinghamshire Council's Network Safety Team would need to provide a view and be supportive of speed limit changes ahead of the statutory public consultation. The Police and our Network Safety Team are likely to have a view on the road widening, right-turn lane, and priority narrowing, and statutory public consultation would be required for the priority narrowing. The statutory public consultation and associated traffic regulation order process is outside of the planning process and the outcomes of this cannot be guaranteed, and currently I must continue to assess the visibility requirements based on a road speed of 60mph.

I have spoken with Thames Valley Police at this early stage and was advised that although it primarily lies within Hertfordshire, the priority narrowing would not be supported and if the road speed were to be reduced to 30mph, the Police would expect a package of significant traffic-calming measures to be introduced and would require a road speed assessment to be undertaken. I have also spoken with our Network Safety Team who advised that they would also not support the priority narrowing and that any speed limit changes must be in compliance with the National Guidance on setting speed limits. This guidance can be found at the following link: <https://www.gov.uk/government/publications/setting-local-speed-limits/setting-local-speed-limits>. They advised that they would be unlikely to support a reduction from 60mph to 30mph given the road environment and lack of roadside development.

The new access onto Long Marston Road needs to comply with the visibility requirements stated by Manual for Streets of 2.4m x 151m from both directions to the near side carriageway. After assessing the site, I consider that to the west a visibility of only 2.4m x 114m can be achieved and to the east a visibility of 2.4m x 125m can be achieved. I require a speed survey to be undertaken to determine the speed vehicles are currently travelling along Long Marston Road. If vehicles are travelling below the speed limit, I will be able to revise down the visibility requirements, however without this evidence I must request the full level of visibility.

I note that the width of the new access road will be 5.5m which will support two-way flow and 2m wide footways will be provided on either side of the access road. The applicant also states that a right-turn lane will be provided for vehicles to pull clear of the main carriageway and turn into the site. The lanes on Long Marston Road will be 3.5 metres wide and the right-turn lane will be 3 metres wide. The applicant also intends to widen the carriageway for the entirety of Lukes Lane / Long Marston Road 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, where a priority "give-way" arrangement is proposed. I note that the applicant states that the exact highways boundary will be confirmed by their legal team, and once this has been confirmed, I would like the applicant to submit a further plan demonstrating that all the highway works are achievable within the public highway or within the red edge of the site. I do note that the Planners are likely to have concerns with the impact of these highway works on verges and hedgerows and with the implementation of street lighting.

The highway works, including the right-turn lane, priority "give way" arrangement and carriageway widening must be subject to a Stage 1 Road Safety Audit, and I would need this to be undertaken before I can comment further.

I note that this Highway Authority has consistently raised concerns with the intensification in use of the road up from the Red Lion Bridge to the site. The previous concerns were raised by my colleague for application 13/02632/APP who stated the following:

"The site is accessed from Long Marston Lane, which at this point is subject to the national speed limit of 60mph. Vehicles wishing to access the site from the east would have to do so through the Village of Marsworth where roads are narrow and winding with bends where forward visibility is restricted. The bridge by the Red Lion Pub in Marsworth is restricted in width and will only allow one vehicle to pass over it at any one time. The gradient of the bridge also restricts forward visibility; therefore an increase of movements over the bridge would be detrimental to Highway safety."

I consider that my colleague's comments are still highly relevant in this instance as the bridge is only wide enough for one vehicle to pass and given the lack of forward visibility over the bridge, I again consider an intensification in vehicular movements over the bridge would be detrimental to highway safety.

Furthermore, the Inspector for appeal ref. 07/00047/NONDET also raised highways safety concerns with regards to the Red Lion Bridge and stated the following:

"Furthermore, to the east, the limited width of the Red Lion Bridge in Marsworth restricts traffic to single file. Its steep gradient on the western approach, along with the limited forward visibility, poses a risk of accidents occurring and the possibility of large vehicles grounding. Combined with the bridge's weight

restriction of 17 tonnes, these factors increase the likelihood of larger vehicles using the narrower route along Lukes Lane."

I do not consider anything to have materially changed at the Red Lion Bridge since the Inspector and the Highways Officer made their previous comments. The applicant is not proposing any carriageway works to alter the way the bridge will operate and thus I consider that the above highway safety concerns still stand. Importantly, the Inspector in the previous appeal stated that: *"In my view, this volume would worsen the highway safety situation significantly, even if all these journeys were by car, and not larger vehicles"* and this is highly relevant to this application which would generate additional car movements across the Red Lion Bridge.

Furthermore, the concerns that my colleague identified with regards to forward visibility along the bendy Long Marston Road persist and whilst carriageway improvements will occur along Long Marston Road / Lukes Lane to the west, no improvements are proposed along Long Marston Road to the east. I do have concerns that the level of forward visibility along Long Marston Road is still not acceptable and that the carriageway is not wide enough in some locations to adequately support two-way flow. For instance, Long Marston Road has a minimum width of 4.7m in some locations and as noted previously, the bridge only has a width of 3m which represents a clear highways safety concern for passing traffic along this road.

The road network for vehicles approaching from the west is mainly within Hertfordshire and historically Hertfordshire County Council's Highways Development Control office have voiced concerns over the potential increase in vehicle movements navigating through Gubblecote and along Lukes Lane and the poor visibility at the junction where Lukes Lane meets Tring Road and Wingrave Road with the alignment of the junction resulting in larger vehicles having to use the full road width to turn. I trust that Hertfordshire County Council will consider the highways impacts of the proposal to the west along Lukes Lane and review the highway works that the applicant is proposing in this direction.

Sustainable Access

Public Transport – Bus Services

The site is located approximately 0.5 miles away from the nearest existing bus stop which is located on Tring Road to the west of the site. This is outside of acceptable walking distances and there is no footway along the carriageway for residents to safely walk to this bus stop. This provision would not adequately cater for new residents and visitors to the proposed development.

The applicant intends to widen the carriageway along Long Marston Road / Lukes Lane to 6m to facilitate access for buses. A bus stop will be provided within the site and the 62-bus service will be diverted into the site. The applicant proposes to secure an additional journey from Aylesbury Bus Station at 6.05pm for commuters to use to travel back from Aylesbury in the evening.

I welcome the implementation of this bus diversion however I have concerns over how useable this bus service will be for residents. Only one bus comes every hour from 8.00am to 5.00pm, and this is unlikely to be of the frequency to be a viable alternative to the private car in this location. Equally, journeys from the main nearby employment centre, Aylesbury, will take approximately 45 minutes and this length of journey is unlikely to be desirable for commuters.

Furthermore, no services will be operational in the evening as the final bus leaves Marsworth at 5.05pm and if a resident decides to go out to a restaurant or another leisure activity inevitably these journeys will have to be made by the private car. No services will operate at all on Sunday and trips would have to be made by the private car on this day. I consider that the improvements outlined are not frequent or attractive enough to provide an alternative to the private car to access employment, education and retail uses.

Finally, I note in the applicant's correspondence with Red Eagle Buses Ltd that funding will be in place for 5 years for this bus diversion after which it is hoped the service would be self-sustaining. I do have

concerns that this bus diversion will not be sustainable in the longer term after the funding has ceased and am waiting to hear back from the Council's Passenger Transport team to get their thoughts on this matter.

Public Transport – Train Services

The nearest train station is in Cheddington, and it is approximately 5.4km away from the site. I consider that there is limited connectivity to this train station and journeys would generally have to be made with the private car. The applicant states that the station can be accessed by a short 10-min bus ride to Cheddington Green and then a 15-min walk to the station. Whilst this is the case, the 62-bus service does not operate with the frequency to be considered an attractive option by residents and train services depart once an hour in each direction meaning that the frequency of service of both the bus and train are limited and unlikely to align in a way to be appealing to residents.

Footways

The applicant intends to provide footway improvements from the site down to Marsworth to provide a continuous footway link to the village. The footway will be a minimum of 1.5m wide on at least one side of the carriageway along Long Marston Road and Vicarage Road. These improvements appear to be provided in highways land and the applicant will ensure that the route is lit which is welcomed from a highway perspective. However, as previously noted, the implementation of a large amount of street lighting is likely to be problematic from a planning perspective.

The proposed footway is 1.5m wide for most of its duration which is too narrow and does not meet the minimum requirement in the Department for Transport's (DfT) Inclusive Mobility document of 2m. Manual for Streets also states that the minimum unobstructed width for pedestrians should generally be 2m. A width of 1.5m will mean that two wheelchair or mobility scooter users cannot pass and will result in dangerous situations whereby one of the users may have to go into the carriageway to avoid the other. This is an unacceptable scenario and means that safe and suitable pedestrian access cannot be achieved for all users, and I will require a minimum 2m wide footway to provide for safe access and to encourage people to walk to and from Marsworth. The applicant also states that there is a restricted section of footway where the width is 0.9m for roughly 5m opposite No. 76 Vicarage Road, and this is adequate, given the DfT's Inclusive Mobility Document states that the absolute minimum restricted width should be 1m for a maximum distance of 6m.

The applicant also states that a 1m wide coloured section of carriageway will be provided along the Red Lion Bridge to provide a degree of pedestrian provision. Whilst I appreciate the intention, the length of a restricted section of footway / pedestrian area should only be for 6m according to DfT's Inclusive Mobility document and this restricted pedestrian area is for a distance of approximately 37m. Given the narrow width of the bridge, I would consider it problematic if two mobility scooters had to pass or if a pedestrian and a wheelchair user had to pass as they would be put into conflict with motor vehicles also crossing the bridge. Whilst I appreciate that some pedestrians may already walk over the bridge, this development would intensify the number of pedestrian movements heading towards the village and would materially worsen the situation. Furthermore, I consider that pedestrians would find crossing the bridge unappealing due to its narrow nature and the real, and perceived risk of coming into close conflict with motorists.

The CIHT publication '*Guidelines for Providing for Journeys on Foot*' (2000) professional guidance on planning for and providing for pedestrians, maintaining pedestrian infrastructure and promoting walking. Paragraph 3.30 states that the "*average length of walk journey is one kilometre (0.6 miles)*". Table 3.2 from the publication sets out acceptable walking distances to facilities (which do not take into account of an individual's fitness and physical ability and encumbrances):

Table 3.2: Suggested Walking Distance			
	Town Centre (m)	Commuting / School (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800

Maximum	800	2000	1200
---------	-----	------	------

Whilst some of the existing local facilities within Marsworth are within the preferred acceptable range given in the table above, it is important to note that over 700m of these journey lengths would have to take place along the narrow, remote, rural footway adjacent to Long Marston Road. Given the narrow and remote nature of the footway, I do not consider that this route is safe, suitable or attractive to cater for pedestrian movements to and from the site.

The footway would also only be overlooked by a few sporadic habitable dwellings and would not provide pedestrians a great sense of security. Because the footway is narrow, has several pinch points and is not overlooked by many dwellings, I do not consider that this route into Marsworth would be attractive for pedestrians, and they would look to use alternative transport options.

Cycling

There are no designated cycle routes or facilities around the site and whilst Lukes Lane is intended to be widened to 6m, which would better accommodate cyclists and will be lit, beyond this cyclists would need to journey along narrow, poorly lit country roads to get to the majority of nearby facilities. I do consider that the majority of facilities such as Cheddington Train Station and Tring Town Centre fall within a distance of 5 miles from the site, which is the industry approved standard for cycling distance, CIHT: Planning for Cycling, however I do not consider that these routes would be appealing to most cyclists particularly during the winter months as they are along unlit, narrow country roads which would be tricky to navigate in dark and inclement conditions.

All new developments must be compliant with LTN 1/20 which is the latest DfT guidance for cycling infrastructure. LTN 1/20 Paragraph 14.3.12 states that: *“Cycling facilities should be regarded as an essential component of the site access and any off-site highway improvements that may be necessary. Developments that do not adequately make provision for cycling in their transport proposals should not be approved.”* I therefore require the applicant to investigate some off-site highways improvements that could be done along the existing highway.

Car Club

The applicant has also been in discussion with Co Wheels to provide car club provision on the site. I note that Co Wheels have stated in Appendix 2 of the Transport Assessment that *“the location does not offer significant car club potential”* and I also have concerns over how viable car clubs will be in this location. Co Wheels also stated the following which is of relevance:

“The intention is that at the end of an initial three-year period that the cars have 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 to give the scheme additional time to become sustainable as additional phases of the development are completed and residents move in.”

There seems to be uncertainty over how successful the Car Club will be and doubts over how long the scheme will take to become sustainable. I am not convinced that this can be seen as a viable alternative to the private car in this location.

Local Amenities

Whilst Marsworth does have some local facilities, the nature of the area indicates that the future residents of the development would have to rely heavily on the facilities and services of other larger settlements which would invariably involve regular travel by the private motor vehicle which is the least sustainable mode of transport. As noted in the section above, I do not consider that the bus service operates frequently enough to be a viable alternative to the private car. In this sense the dwellings would be isolated and not in a sustainable location and therefore would be in conflict with the Framework.

Some local facilities have been provided within the development such as a 0.5 form-entry Primary School, Local Centre, Mobility Hub and Rural Enterprise Hub however it is my view that the development would still be reliant on the facilities provided by a larger settlement as residents would want to utilise Supermarkets, Doctors Surgeries, Secondary Schools and Leisure Facilities (Cinema, Gym and Sports Pitches). It is my view that residents would still be heavily dependent on the private car to get to these locations.

Travel Plan

The Travel Plan Framework in Appendix 4 of the Transport Assessment is currently under review by our Transport Strategy Team and further comments on this will be provided in due course.

Overall, the site is not considered sustainable in transport terms in the context of the requirements of the NPPF and would be reliant on the use of the private motor vehicle. I consider that the proposed development would be in conflict with paragraph 110 and 112 of the NPPF.

Summary

The Highway Authority objects and recommends that this planning application is refused for the following reasons:

1. Insufficient information has been submitted with the planning application to enable the highways, traffic and transportation implications of the proposed development to be fully assessed. From the information submitted, we are unable to determine whether the additional traffic likely to be generated by the proposal would adversely affect the safety and flow of users of the existing road network, contrary to the National Planning Policy Framework, Buckinghamshire Council Local Transport Plan 4 (adopted April 2016) and the Buckinghamshire Council Highways Development Management Guidance document (adopted July 2018).
2. The local highway network that serves the site is inadequate by reasons of its width, alignment and visibility to serve the proposed development with safety and convenience. The development would result in additional vehicle movements along inadequate sections of highway which will be detrimental to Highway safety. The development is therefore contrary to the National Planning Policy Framework, Buckinghamshire Council Local Transport Plan 4 (adopted April 2016) and the Buckinghamshire Council Highways Development Management Guidance document (adopted July 2018).
3. The applicant has not made adequate provision for a footway between the application site and the surrounding area and therefore the inadequate footways would lead to conditions of danger to pedestrians walking to or from the proposed development. The development is contrary to the National Planning Policy Framework, Buckinghamshire Council Local Transport Plan 4 (adopted April 2016) and the Buckinghamshire Council Highways Development Management Guidance document (adopted July 2018).
4. The location of the site is such that it has only limited access by non-car modes of travel. The absence of adequate infrastructure and the sites remoteness from major built up areas is such that it is likely to be reliant on the use of the private car contrary to local and national transport policy. The development is therefore contrary to the National Planning Policy Framework, Buckinghamshire Council Local Transport Plan 4 (adopted April 2016) and the Buckinghamshire Council Highways Development Management Guidance document (adopted July 2018).

Yours sincerely

Matthew Raven
Highways Development Management Officer
Planning Growth & Sustainability

Authorised by Andrew Cooper
Senior Highways Development Management Officer
Highways Development Management