Planning Application – PL/21/4632/OA

Land between Burtons Lane and Lodge Lane in Little Chalfont

Appendix A

Independent Highways Assessment

Paul Mew Associates

Supporting the objection by:

Little Chalfont Parish Council

and

Little Chalfont Community Association

19 January 2022

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PAUL MEW ASSOCIATES
TRAFFIC CONSULTANTS

LITTLE CHALFONT COMMUNITY ASSOCIATION & LITTLE CHALFONT PARISH COUNCIL

LITTLE CHALFONT GOLF CLUB, LODGE LANE AND ADJACENT LAND TO THE SOUTH INCLUDING HOMESTEAD, BURTONS LANE, LITTLE CHALFONT, BUCKINGHAMSHIRE, HP8 4AJ

INDEPENDENT HIGHWAYS ASSESSMENT

January 2022

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1.0 INTRODUCTION

1.1 Paul Mew Associates have been appointed by the Little Chalfont Community Association & Little Chalfont Parish Council to carry out an independent audit of the transport implications of the proposed development of Little Chalfont Golf Club, Lodge Lane and adjacent land to the south including Homestead, Burtons Lane, Little Chalfont, Buckinghamshire, HP8 4AJ.

1.2 The proposed development that has been submitted to Buckinghamshire Council under Planning Ref: PL/21/4632/OA is for the;

"demolition of all existing buildings and the erection of residential dwellings including affordable housing, custom build (Use Class C3), retirement homes and care home (Use Class C2), new vehicular access point off Burtons Lane, improvements to existing Lodge Lane access including works to Lodge Lane and Church Grove, new pedestrian and cycle access at Oakington Avenue including construction of new pedestrian and cycle bridge and associated highway works, a local centre including a community building (Use Classes E(a)(b)(e), F2(b)), land safeguarded for educational use (Use Classes E(f) and F1(a)), public open space and associated infrastructure (matters to be considered at this stage: Burtons Lane and Lodge Lane access)."

1.3 The Transport Assessment submitted by the applicant includes a more 'quantitative' description of the proposed land uses, comprising of:

…380 residential units (Use Class C3), up to 100 Bed Retirement Living (Use Class C2), up 60 Bed Care Home (Use Class C2), land safeguarding for a 1FE primary school and nursery, up to 1,000m² community hub and associated infrastructure delivery including road, cycle, landscaping, reprofiling and bridge link to Oakington Avenue.

1.4 This Independent Highways Assessment has examined the Transport Statement, Framework Travel Plan and Framework Construction Traffic Management Plan submitted in support of the application. A site visit has also been carried out by Paul Mew Associates to assess the site and the potential impact of the proposed development on local conditions.

1.5 The findings of this assessment are set out in the following chapters on a document by document basis, and in the order of contents of each document.

2.0 TRANSPORT STATEMENT

2.1 This chapter assesses the Transport Statement submitted in support of the application. It should be noted that the document is entitled Transport Statement but within the document it is referred to as a Transport Assessment. The Department for Transport's guidance on the preparation of Transport Statements and Transport Assessments makes clear that Transport Statements are for small developments which are expected to generate relatively low numbers of trips or traffic flows, with minor transport impacts. As such, the document should have been entitled Transport Assessment. Additionally, the title page of the Transport Statement sets out that the proposed development is 'residential'. It would have been more accurate to describe the development as 'mixed use' as in addition to 380 dwellings, the scheme proposed retirement dwellings, a care home, a 1FE primary school and a community hub.

Chapter 1. Introduction

2.2 The introduction includes the statement that '*Safe and suitable vehicular access to the proposed development will be provided from Lodge Lane and Burtons Lane*'. There is no evidence in the Transport Statement, or in the application, that the required Road Safety Audit and Non-Motorised User Audit processes have been carried out. Stage 1 Road Safety Audits and Non-Motorised User Audits should have been carried out for any new or amended road junctions to assess the safety implications of changes for motorists, pedestrians, cyclists and other non-motorised users. Until such audits are carried out, the assertion that 'safe' vehicle access will be provided should be rescinded.

2.3 The assertion that '*the site is accessible by sustainable modes of travel including foot, cycle and public transport'* is questioned as discussed in more detail later in this chapter.

Chapter 2. Transport Policy Context

2.4 Chapter 2 of the Transport Statement presents a review of relevant planning policy and with respect to local, regional, and national guidance. It does not however set out how the proposed development complies with these policy requirements, with the exception of parking standards.

Chapter 3. Existing Transport Network

2.5 Para 3.6 of the Transport Statement sets out that Lodge Lane is circa 4.8m wide. It does not mention that the road is largely provided in a 'cutting / gulley' with steep banks rising on either side and that vegetation / soil encroaches on either side of the tarmac surface – all of which would reduce the effective width of the road. Para 3.6 also does not mention that the railway bridge has a height clearance of 13''0' (3.96m) or that Lodge Lane has sections of considerable gradient of up to 9% (1:11) which could pose safety issues for large vehicles and / or in icy conditions. There are no footways or street lighting on Lodge Lane.

2.6 Paragraph 3.6 of the Transport Statement sets out that Burtons Lane is partially lit and provided with footways, while Paragraph 2.2 of the Design & Access Statement claims the footpath from the Burtons Lane entrance to the village centre is 1.5 to 2m wide. Assessment of the section of Burtons Lane adjacent to the site and north to the A404 (a distance of circa 630m) reveals there are just 2 lamp columns. As such during hours of darkness the majority of the footway to the north would be unlit. In addition, the footway is only 1m wide at some points and not in a good state of repair with edges crumbling. The footway is also subject to reduced natural surveillance. Taken in conjunction, the above factors would lead to a reduced feeling of safety for pedestrians.

2.7 The Transport Statement presents no data on existing traffic flows on Lodge Lane, Burtons Lane or indeed any other local road. It would have been expected that, as a minimum, automatic traffic count data had been collected / reported so that vehicle speed data could be used to confirm / assess sightline requirements.

2.8 Paragraph 3.7 of the Transport Statement, part of the Sustainable Transport Accessibility section, includes the statement that '*Most people will walk to destination that is less than one mile (Planning for Walking, 2015*)'. A quick internet search shows a contradictory assessment from The Independent newspaper (14/06/18) which sets out that a survey in 2018 revealed that "*In a study of 2,000 adults, 40 per cent admitted they would not be willing to walk more than a mile to get somewhere, opting for an alternative form of transport instead*". As such, the other claims made about how far people are willing to walk or cycle in this paragraph and Paragraphs 3.12 to 3.14 of the Transport Statement need to be taken with a degree of scepticism.

2.9 A walk catchment figure has been prepared and presented at Appendix A, but it is in not clear if the isochrones reflect the current situation, or the proposed development whereby a new pedestrian / cycle bridge link across the railway line will be provided. For example, Oakington Avenue which is to the north of the railway line is shown as being a 10 minute walk from the centre of the site, but at present there is no direct pedestrian route – the walk route via Lodge Lane or Burtons Lane is likely to exceed 10 minutes. As such the walk catchment figure may present an overly optimistic view of the site pedestrian accessibility. It is also noted that Para's 3.12 and 3.13 refer to Drawing 140207/SK1 within Appendix A, but Appendix A only includes a single drawing entitled Figure 3.2 and that the drawing shows local facilities (district centre, community library, primary school, high school, GP surgery and station). These facilities are not shown on the walk catchment map, neither does it show the site boundary. An explicit assessment of road traffic accidents involving pedestrian casualties is not presented.

2.10 The Transport Statement does not include any assessment of accessible access to the site for wheelchair users or for those with reduced mobility.

2.11 With regards cycle access while Burtons Lane may form part of a local cycle route, the Transport Statement does not mention the gradient on Burtons Lane which may affect how realistic cycle use would be for users of the new development. Neither is an explicit assessment of road traffic accidents involving cyclists

presented. The use of Lodge Lane by cyclists, given the road's width and the volume of development traffic forecast to use it, could lead to road safety issues.

2.12 The Public Transport section of Chapter 3 states that the centre of the site is within 500m of Chalfont and Latimer Station. It should be noted that this is an 'as the crow flies' distance. The minimum walk distance without the proposed new railway bridge is 1.3km, while with the new railway bridge it would be around 700m. Hence, the 500m claim is misleading.

2.13 Paragraph 3.19 suggests there are approximately 10 rail services an hour in each direction, which would total 20 services. Assessment of Chiltern Railways and Transport for London timetables shows that during the peak hour (08:00-09:00) there are a total of 15 rail and underground services. During off peak hours, the number of services is lower than this.

2.14 The provision of local bus services is poor with just 2 services available at a walk distance of around 700m (with the new footbridge) or 1.3km without, and with service frequencies of just 1 per hour or 1 every 2 hours with limited / no services at weekends.

2.15 There is no assessment of step free access at Chalfont and Latimer Station or for local bus services for wheelchair users or for those with reduced mobility.

2.16 The Census data presented in Table 3.3 is for journeys to work and will reflect the fact that many local people will commute in to London by rail / underground with 25% of journeys to work being made by this mode. The data does not show how non-journeys to work are made, such as trips to / from school, shopping trips or leisure / travel trips. This would be likely to account for a significant number of trips per day which are unlikely to be made by rail and more likely to be made by car.

2.17 The road safety assessment includes what is stated to be the last available 5 year period (2015 to 2019). At the time the Transport Statement was prepared the most recent available Crashmap 5 year period was 2016 to 2020. Map extracts showing the location of road traffic accidents involving pedestrians and cyclists should have been shown.

2.18 The summary presented at the end of Chapter 3 suggests that '*the site is extremely accessible by a variety of alternative modes of transport that have the potential to reduce reliance upon the private car, with currently 82% of local residents traveling to work by alternative modes*.'

2.19 This claim is contested on the basis of the arguments set out above. The claim that 82% of local residents travel to work by modes of transport other than car is incorrect and misleading. Table 3.3 of the Transport Statement shows that 66% of people in the area travel to work by car (as car driver or passenger), which means that those that travel by modes other than the car account for 34% - not 82%.

Chapter 4. Proposed Development

2.20 Paragraph 4.3 of Transport Statement sets out that "*a safe and suitable access strategy for the site was agreed during pre-planning discussions with Buckinghamshire County Council for a larger potential development than that proposed*". This appears to relate to discussions mentioned in a letter of 21/02/20 from CBRE to the Inspectors appointed to conduct the Examination in Public of the draft CSB draft local plan, said to have taken place in July 2018 and June 2019. It has been reported to Paul Mew Associates that prolonged attempts by the Parish Council to obtain details of these discussions from Buckinghamshire Council were refused, but it is believed that only preliminary discussions had taken place, and that detailed design drawings had not been provided to the Highways Authority to enable them to assess the proposals.

2.21 A subsequent request for the documents relating to these meetings, made by a local resident under the Environmental Information Regulations, was refused on grounds of confidentiality. It is suggested that as these discussions were held with a council since abolished, on a draft plan subsequently withdrawn, and since no minutes, report or other details of the meetings were published, the applicant's claim that an access strategy was agreed should carry no material planning significance.

2.22 The proposed access from Lodge Lane will be provided by means of an amended / widened priority junction at the location to the former golf club and will serve the eastern part of the site. Sightlines of 2.4m x 120m are shown but the assessment to the north does not appear to take in to consideration the railway bridge and gradient to the road which rises significantly, such that the railway bridge could obscure the sightline to the north. Indeed, there is no mention of sightlines or visibility assessments in the text of the report. The only reference to visibility assessment is in Appendix H, but again no explanation as to why sightlines of 120m have been assessed.

2.23 The sightline figures also present swept path analysis for a large refuse vehicle of height 3.76m approaching / leaving the site to / from the north. It should be noted that the railway bridge to the north has a height clearance of 3.96m.

2.24 Proposed widening of Lodge Lane from 4.8m to 5.5m will lead to a considerable loss of local habitat. The road under the railway bridge does appears also to be subject to road widening but it is questioned as to how much additional effective width would realistically be achieved at this location. The site visit revealed that at present the wall-to-wall width of the over-bridge is 6.1m. Allowing for a 0.5m 'verge' on either side leaves only circa 5m for the two-way running lane which would require some form of priority operating system with vehicles from one direction being required to give way to vehicles approaching from the other direction.

2.25 Access to the south via Lodge Lane, for onward connection to the B4442 and A413, is narrow with single lane only sections with passing places and considerable gradient issues.

2.26 It should be noted that during previous consultations for potential development on this site, it was made clear that a substantive access onto Lodge Lane would not be supported by the highway authority - *"Unlikely to be supported by the Highway Authority unless a suitable access can be achieved from Burton's Lane, as there are likely to be issues with visibility onto Lodge Lane and the width of Lodge Lane itself. Will require Transport Assessment."* (page 31 of the Post Preferred Green Belt Options Consultation November 2017).

2.27 The proposed access from Burtons Lane will be provided by means of a new priority junction to the south of the existing access to Homestead and will serve the western part of the site. Burtons Lane is a narrow two-way single carriageway road with a width of only around 5m, operating with a speed limit of 30mph in the vicinity of the site. There is a broad verge and footway on the eastern side of Burtons Lane adjacent to the site.

2.28 Burtons Lane has a blind crest when looking to the south on leaving the site which is due to the fact that the site is in a dry valley that runs east west down the middle of the site. The site visit suggested that this crest to the south could limit visibility to the south. The Transport Statement makes no mention of the crest to the south and its impact on achievable sightlines. Again, there is no mention of sightlines or visibility assessments in the text of the report with regards the proposed Burtons Lane access. The only reference to visibility assessment is in Appendix J, but again no explanation as to why sightlines of 90m have been assessed. Speed surveys should have been carried out to confirm sightline requirements.

2.29 Although not 'all purpose trunk roads', Lodge Lane and Burtons Lane would be relied on by the development for access / connector roads to local amenities and the wider local road network. As such, general design guidelines set out in Design Manual for Roads and Bridges: CD 127 Cross-sections and Headrooms should be considered. For rural all purpose roads CD 127 suggests lane widths of 3.65m such that a two way road would have a carriageway width of 7.3m. The circa 5.0m width of Lodge Lane and Burtons Lane are considerably less than this design standard.

2.30 In addition, CD 127 suggests the minimum (maintained) headroom for bridge structures should be 5.03m plus an additional clearance relating to the 'sag' curve radius, which would be required at this location due the road gradients either side of the bridge. The current height clearance of 3.96m on Lodge Lane, again is considerably less than this design standard. It should also be noted that the gradients on Lodge Lane either side of the proposed site access are subject to ice / snow as Lodge Lane is not part of Buckinghamshire Councils winter gritting list.

2.31 The Transport Statement sets out that while the vehicle accesses on Lodge Lane and Burtons Lane will be linked, through traffic will be limited to bus and sustainable transport with no access provided for other vehicular traffic. No detail is provided as to how this control will operate. It is inevitable that any access control (gate / barrier / bollard) will be breached and that through vehicular traffic will result.

2.32 The proposed servicing strategy and accompanying service vehicle swept path analysis (Appendix M) suggests that refuse vehicles would be able to travel between the two access points. The Transport Statement has previously set out that through traffic will be limited to bus and sustainable transport.

2.33 There is no evidence that Road Safety Audits have been carried out for the proposed site access junctions or the internal road layout. Given that full planning consent is being sought for access as part of the outline application, Road Safety Audits for the proposed vehicular accesses should have been supplied.

2.34 With the pedestrian / cycle access section of Chapter 4 it is proposed to convert the existing zebra crossing on Amersham Road to a toucan crossing. There is no evidence to confirm that the amended junction meets the design requirements for toucan crossing facilities or that a Road Safety Audit has been carried out for this proposed change.

2.35 It is also proposed that the existing Oakington Avenue / Amersham Road junction will be relocated approximately five metres to the east. There is no evidence that a Road Safety Audit has been carried out for this proposed change.

2.36 There is no proposal to provide a footway or street lighting on Lodge Lane. Taken in conjunction with the gradient of the road towards the village centre, the use of Lodge Lane by residents of the proposed scheme to access bus stops on Amersham Road (to the west of Church Grove) would raise significant road safety issues.

2.37 The proposal includes the provision of a new pedestrian / cycle bridge over the railway linking to the western end of Oakington Avenue. At peak times, this could lead to considerable numbers of pedestrians accessing the narrow footways on Oakington Avenue with up to 150 additional pedestrian / cycle trips during the AM peal hour according to the Transport Statement. These numbers would include parents with prams / toddlers / scooters heading to / from school. Additional vehicular traffic could also be present at this location as parents drop-off or pick-up children attending the new school. The Transport Statement makes no mention of these issues, nor does it present a 'pedestrian level of comfort' assessment for the footway at this location.

2.38 The present bus stops on eastern section of the A404 are situated at the two junctions with Church Grove; 680m to 930m from the site centre via the new footbridge and hence inconvenient for site users. The applicant proposes moving the bus stops closer to the new pedestrian bridge location with the westbound bus stop on the hill west of the junction with Oakington Avenue, approximately where there is currently a temporary dropped kerb and entrance to a building site in the rear garden of No.1 Oakington Avenue. Applications to have the temporary entrance made permanent have twice been refused at appeal on road safety grounds (Application Ref: CH/2017/2197/FA, Appeal Ref APP/X0415/W/18/3203607; and Application Ref: PL/20/0689/FA, Appeal Ref: APP/X0415/D/20/3253104). Therefore, the proposed new bus stop location, near a radar trap installed because of accident risk, does not appear suitable.

2.39 The alternative relocated westbound bus stop would be placed east of the Oakington Avenue junction on a curved section of the A404 which could lead to forward sightlines issues for cars wanting to overtake a bus waiting at the new bus stop. It would also be necessary to construct an access path, and the bus-stop itself, on an established and popular 'green space' owned by Buckinghamshire Council and tended by local residents, who value it as recreational space and a visual amenity. Bushes and trees on that space would have to be removed to provide pedestrian access to the bus-stop. Therefore, it appears unlikely that any bus-stop could be placed in a position to make the footway across the railway convenient for access to buses.

2.40 Local residents have reported that prior to Covid-19 the 487 space car park at Chalfont and Latimer Station was full on most weekdays before 09:00 with standing room only on peak hour services to London. The 'full car parks situation' is expected to return over time. The proposed development would lead to additional car journeys to drop off/pick up commuters at the station, additional stress on car parking and on crowed commuter services. It is also noted that Chalfont and Latimer Station is used by many people who do not live in Little Chalfont but from other settlements, mostly to the north, to keep down their rail travel costs. If parking numbers were increased, it could potentially attract even more cars that would add to the morning rush hour traffic.

Chapter 5. Highway Baseline Conditions

2.41 Chapter 5 of the Transport Statement sets out the assessment of current local junction performance for 5 local junctions agreed with the Highways Authority. All 5 junctions assessed are on Amersham Road to the north of the site, which would appear to reflect the supposition that most vehicle trips to / from the site will route to / from Little Chalfont centre which is located to the north of the site.

2.42 Turning count data used in the assessments dates from 2017 with updates being discounted due to the effect of Covid-19.

2.43 The results suggest that 4 of the 5 junctions assessed were operating satisfactorily but that the mini-roundabout junction of A404 Amersham Road / B4442 Cokes Lane had capacity, delay and 'level of service' issues.

2.44 In the current situation, the junction of Burtons Lane with Amersham Road (Chalfont Station Road) operates as a priority T-junction. There are existing "Keep Clear" markings on the junction to facilitate vehicles turning into and out of Burtons Lane. The presence of these markings indicates that there is an existing issue with vehicles queuing back from the Cokes Lane mini-roundabout to the west blocking Burtons Lane. This is supported by local observations which confirm that these junctions become congested during peak periods.

2.45 The same general assessment applies to the junctions with background flows growthed to the future year of 2026.

Chapter 6. Vehicle Trip Generation and Traffic Distribution

2.46 Chapter 6 initially presents details of TRICS database trip generation forecasts for the proposed development with relevant extracts from the TRICS database included at Appendix Q. It is noted that no explanation is provided as to how TRICS sites have been selected and why they consider them to represent the proposed development. TRICS sites selected should reflect factors such as location, local population, car ownership and public transport and parking provision.

2.47 For example, 4 of the 8 'mixed houses and flats' sites for private residential land uses are located in Greater London, while another 3 are located on the edge of city centres / large conurbation centres. In these type of locations, public and other sustainable transport provision is likely to be significantly better that at the proposed development site. This would have the effect of under-estimating vehicle trip rates.

2.48 With regards the proposed 1FE primary school, the assessment assumes that 50% of trips will be to / from the proposed residential development, but there is no assessment to demonstrate that the proposed residential development population would include the commensurate number of primary school aged children.

2.49 Census 'work destination' data has been assumed to assign development trips to the local road network. These proportions have also been applied to school trips which are unlikely to accurately reflect actual school trip origins / routings. In addition, the trip generations from the various land uses will also have included non-work trips, (again including school trips) which have been assumed to have the same origins / destinations / routings at 'journey to work' trips.

2.50 The proposed development would have two vehicular access points;

- On to Burtons Lane serving 110 residential units which would need to accommodate 51 vehicle trips in the AM peak hour, 44 in the PM peak hour and 435 over the 12 hour period from 07:00 to19:00, and,
- On to Lodge Lane, serving the 271 residential units, a 100 dwelling retirement development, a 60 bed care home and a 1FE primary school which would need to accommodate 221 vehicle trips in the AM peak hour, 139 in the PM peak hour and 1,651 over the 12 hour period from 07:00 to19:00.

2.51 Lodge Lane, Burtons Lane, and the proposed vehicle accesses on them are not considered to be suitable to accommodate the level of vehicle trips forecast to be generated by the development. As set out earlier in this chapter, Lodge Lane and Burtons Lane are of restricted widths, 4.8m and circa 5m respectively and even with the widening of Lodge Lane to 5.5m a width restriction at the railway bridge will remain. In addition, there are potential sightline issues at each location due to gradients / level differences. On Lodge Lane, with flows of 1,651 per day there is no discussion over the provision of a right turn ghost island facility in line with general supposition that such facilities are required where flows on the minor arm (site access road) are greater than 500 per day. No such facility is proposed, or even discussed.

2.52 The Transport Statement then applies resulting additional flows to the junctions studied and assesses the impact. As set out above there are concerns over the validity / suitability of the trip generation assessment and the assignment / distribution of these flows to local junctions.

2.53 Despite this, the junction assessment shows that the mini-roundabout junction of A404 Amersham Road / B4442 Cokes Lane would have significant capacity, delay and 'level of service' issues on multiple junction arms in morning and evening peak periods. Additionally, the A404 Amersham Road / Burtons Lane junction would have delay and 'level of service' issues for the stream of traffic from Burtons Lane to A404 Amersham Road (east). These would result from additional flows from the proposed development's Burtons Lane access.

2.54 As a result of additional flows from the proposed development's Lodge Lane access, the junction of A404 Amersham Road / Church Grove / Stoney Lane staggered junction, would have significant capacity, delay and 'level of service' issues on the Stony Lane arm.

2.55 While Chapter 6 of the Transport Statement assesses the impact of the proposed development on key local junctions, it does not mention the general impact of such a development on Little Chalfont itself. Congestion on the local road network already leads to the extensive use of 'rat-runs' such as Elizabeth Avenue, to avoid the A404, and illicit use of private roads such as Long Walk. With additional traffic from the development, the use of these and other 'rat-runs' is only likely to increase.

2.56 In 2019 average daily traffic flows on Amersham Road (DfT Count Point 47084 north of Elizabeth Avenue) were 14,262. The proposed development has been forecast to generate 1,651 vehicle trips per day – most of which would route via the A404 and which would equate to a 12% increase in vehicle trips. Similarly, in 2019 average daily traffic flows on Burtons Lane (DfT Count Point 951825 north of Long Walk) were 1,802. The proposed development has been forecast to generate 435 vehicle trips per day on Burtons Lane, which would equate to a 24% increase in vehicle trips. Such increases in flows are not insignificant.

2.57 The impact of the proposed development also needs to be taken in consideration with the consented development of 309 homes at Newland Park, off the B4442 (planning permission CH/2014/1964/FA) and other proposed developments at Chorleywood, all of which will lead to increased traffic on the A404 through Little Chalfont.

2.58 It is noted that Little Chalfont is alone among the Chiltern District "main settlements for growth" identified in Core Strategy Policy CS2 (Amersham, Chesham, Chalfont St Peter and Little Chalfont) in having no bypass around its centre. Therefore, increased congestion on the A404 (a Strategic Inter-Urban Route) which passes through the village centre and shopping area, would have a more direct effect in reducing the amenity of the centre. This would include, in particular, worsening of the already chronic queuing problem on the A404 for entry to the village's main shopping precinct on Chenies Parade.

2.59 A significant number of children who attend schools in Little Chalfont, such as Dr Challoner' School and accessed from Cokes Lane, travel to and from the village by rail. There is one zebra crossing on Amersham Road (Chalfont Station Road) west of Station Approach, and an informal crossing facility on Amersham Road (Chalfont Station Road) to the east of Burtons Lane. There are no pedestrian crossing facilities on Burtons Lane and only an informal crossing facility on Cokes Lane for access to Dr Challoner' School. The increase in traffic through the centre of Little Chalfont would give rise to increased road safety concerns for children attending local schools who have to cross roads in the centre of the village.

2.60 It is also noted that to route to the M25 (for onward connection to London) residents of the development would use the narrow Burtons Lane or Lodge Lane south and on to Burtons Lane east via Chorleywood, or route north then on to the A404 in the village centre, adding to the heavy congestion which already affects the junctions there. To access the A413, residents would route south via the narrow Burtons Lane or Lodge Lane to the single-track Roughwood Lane, which would not be suitable for such increased traffic flow.

Chapter 7. Mitigation

2.61 The Mitigation chapter of the Transport Statement sets out that Lodge Lane will be widened to 5.5m to accommodate the increase in vehicular movements along this length of road generated as a result of the proposals. As discussed above, due to the steep slopes that rise from either side of much of Lodge Lane, it is questioned how effective any road widening would be along with the environmental impact, and practicality of such widening. There is also the issue of the effective width of the road as it passes under the railway bridge which would require some form of priority operating system with vehicles from one direction being required to give way to vehicles approaching from the other direction. There is no evidence that a Road Safety Audit has been presented for these proposed junction amendments. Finally, there are no proposals to provide footways or street lighting on Lodge Lane which would help mitigate road safety concerns over pedestrians using Lodge Lane.

2.62 No mitigation measures are proposed for the A404 Amersham Road / Church Grove / Stoney Lane staggered junction.

2.63 Mitigation as a result of increased flows on Burtons Lane include widening Burtons Lane to 2 lanes on approach to the A404 Amersham Road, but no evidence is provided to support this statement and again there is no evidence that a Road Safety Audit has been presented for these proposed junction amendments.

2.64 With regards the A404 Amersham Road (Chalfont Station Road) / White Lion Road / B4442 Cokes Lane mini-roundabout, mitigation comprises widening the Amersham Road (Chalfont Station Road) and Cokes Lane approaches of the junction. While this would reduce the impact of the development, capacity, delay and 'level of service' issues would still be significant. The RFC's (ratios of flows to capacity) on all 3 arms would be over 0.92 in the AM peak, with the A404 Amersham Road (Chalfont Station Road) and Cokes Lane operating with RFCs

of 0.98. At this level, it only takes minimal additional flows to result in the junction 'breaking down' - minimal additional flows that could result from alternative trip generation and assignment / distribution assessments. Again, there is no evidence that a Road Safety Audit has been presented for these proposed junction amendments.

Chapter 8. Sustainable Transport Trips

2.65 Chapter 8 of the Transport Statement includes a table showing the number of forecast trips that would be made to / from the site by a range of sustainable modes. The issue with this assessment is that it is based on Census 'journey to work' data, which will skew the results to rail / underground as many local residents will commute to London by these modes.

2.66 The assessment does not consider non-work trips. Residents of the new scheme are unlikely to use rail / underground for school, shopping, leisure or personal business to the same extent at work commuting trips. As such, it is likely that there would be fewer sustainable trips than suggested and hence more car based trips. Additional car based trips and the impact they could have on local junctions / roads have been discussed above.

Chapter 9. Promoting Smarter Choices via Travel Plans

2.67 The Framework Travel Plan submitted in support of the scheme is discussed in the following chapter.

Chapter 10. Summary and Conclusions

2.68 Chapter 10 of the Transport Statement concludes that:

- *The site benefits from access to a sustainable transport network that provides alternatives to the private car;*
- *An analysis of personal injury accident data records has identified that the local highway network is not subject to an abnormally high accident rate;*
- *Appropriate provision will be made for access, parking and servicing in accordance with relevant guidance and standards;*
- *The anticipated increases in vehicular and non-vehicular activity will not lead to a severe impact upon the local transport networks; and,*
- *The use of more sustainable modes of transport will be actively encouraged by operating a Residential Travel Plan.*

2.69 In contrast, this Independent Highways Assessment suggests;

- The site has limited access to sustainable transport with a poor levels of local bus services, pedestrian links that are not lit during hours of darkness and rail services that are at an extended walk distance;
- An analysis of personal injury accident data has not considered the most recent 5 year period and has not fully assessed pedestrian and cyclist injury accidents;
- Access to the site at both proposed locations are likely to have sightline issues, while access routes on Lodge Lane and Burtons Lane are problematic

due to narrow road widths and questionable benefits of road widening. In addition, required Road Safety Auditing has not been carried out / reported

- The impact of anticipated increases in vehicular activity cannot be fully assessed as questions remain over trip generation forecasts, the assignment / distribution of these to the local road network, and the over estimation of the use of sustainable modes of transport.
- A series of thorough / robust Travel Plans would be required across all proposed land uses, not just residential, to achieve a reduction in car based trips.

3.0 FRAMEWORK TRAVEL PLAN

Title Page & Chapter 1. Introduction

3.1 The title page of the Framework Travel Plan sets out that the proposed development is 'residential'. It would have been more accurate to describe the development as 'mixed use' as in addition to 380 dwellings, the scheme proposed retirement dwellings, a care home, a 1FE primary school and a community hub. Similarly, the Objectives of the Travel Plan only relate to 'residents' but should also include retirement dwelling residents along with staff of the care home and community hub. It is set out that the primary school would operate their own school travel plan.

3.2 'Hard' measures proposed to support the travel plan include access from Burtons Lane for cyclists and pedestrians and the new pedestrian / cycle footbridge over the railway line. As discussed in the preceding chapter, pedestrian access via Burtons Lane would not be encouraged by poor street lighting, lack of natural surveillance and gradient issues. The new footbridge could result in congestion at Oakington Avenue.

Chapter 3. Sustainable Travel

3.3 Chapter 3 of the Framework Travel Plan presents an assessment of baseline sustainable transport, copied from the Transport Statement. As such, the comments on the sustainable transport section of the Transport Statement detailed in the preceding chapter of this Independent Highways Assessment apply equally to the Framework Travel Plan, as duplicated below.

3.4 Para 3.1 of the Framework Travel Plan includes the statement that '*Most people will walk to destination that is less than one mile (Planning for Walking, 2015*)'. A quick internet search shows a contradictory assessment from The Independent newspaper (14/06/18) which sets out that a survey in 2018 revealed that "*In a study of 2,000 adults, 40 per cent admitted they would not be willing to walk more than a mile to get somewhere, opting for an alternative form of transport instead*". As such, the other claims made about how far people are willing to walk or cycle in this paragraph and other paragraphs of the Framework Travel Plan need to be taken with a degree of scepticism.

3.5 A walk catchment figure has been prepared and presented at Appendix A, but it is in not clear if the isochrones reflect the current or proposed development. For example, Oakington Avenue which is to the north of the railway line is shown as being a 10 minute walk from the centre of the site, but at present there is no direct pedestrian route – the walk route via Lodge Lane or Burtons Lane is likely to exceed 10 minutes. As such the walk catchment figure may present an overly optimistic view of the site pedestrian accessibility. It is also noted that Para's 3.7 and 3.8 refer to Drawing 140207/SK1 within Appendix A, but Appendix A only includes a single drawing entitled Figure 3.2 and that the drawing shows local facilities (district centre, community library, primary school, high school, GP surgery and station). These facilities are not shown on the walk catchment map, neither does it show the site boundary.

3.6 The Framework Travel Plan does not include any assessment of accessible access to the site for wheelchair users or for those with reduced mobility.

3.7 With regards cycle access while Burtons Lane may form part of a local cycle route, the Framework Travel Plan does not mention the gradient on Burtons Lane which may affect how realistic cycle use would be for users of the new development. Neither is an explicit assessment of road traffic accidents involving cyclists presented.

3.8 The Public Transport section of Chapter 3 states that the centre of the site is within 500m of Chalfont and Latimer Station. It should be noted that this is an 'as the crow flies' distance. The minimum walk distance without the proposed new railway bridge is 1.3km, while with the new railway bridge it would be around 700m. Hence, the 500m claim is misleading.

3.9 Paragraph 3.13 suggests there are approximately 10 rail services an hour in each direction, which would total 20 services. Assessment of Chiltern Railways and Transport for London timetables shows that during the peak hour (08:00-09:00) there are a total of 15 rail and underground services. During off peak hours, the number of serviced is lower than this.

3.10 The provision of local bus services is poor with just 2 services available at a walk distance of around 700m (with the new footbridge) or 1.3km without, and with service frequencies of just 1 per hour or 1 every 2 hours with limited / no services at weekends.

3.11 There is no assessment of step free access at Chalfont and Latimer Station or for local bus services for wheelchair users or for those with reduced mobility.

Chapter 4. Management and Administration

3.12 Details relating to the management and administration of the Travel Plan should relate to retirement dwelling residents and staff of the care home and community hub as well as residents of the proposed 'general' housing.

Chapter 5. Measures

3.13 Details relating to the Travel Plan's measures should relate to retirement dwelling residents and staff of the care home and community hub as well as residents of the proposed 'general' housing.

Chapter 6. Indicative Targets

3.14 The used of Census 'method of travel to work' data does not necessarily reflect the modes of transport used for non-work trips such as school, shopping, leisure or personal business trips. It is acknowledged that actual / site specific targets will be set once initial data collection has been carried out.

3.15 Targets of the Travel Plan include achieving increased usage of car-clubs. However, there has been no mention of car club facilities in the Travel Plan up to this point and it is noted that the nearest existing car-club facility is 4 miles away at Chalfont St Peter and as such would not be of practical use of residents of staff at the proposed development. If it is suggested that a car club facility is provided on-site, this would be subject to a feasibility study by car club operators as to whether such a proposition would be financially viable. Given that most, if not all residents of the proposed scheme will own a car, it is questioned as to how effective a car club facility would be.

3.16 Targets should also relate to retirement dwelling residents and staff of the care home and community hub as well as residents of the proposed 'general' housing.

Chapter 7. Monitoring and Review

3.17 It is set out in Chapter 7 that the Travel Plan will be monitored once 80% occupancy has been reached and then on the third and fifth anniversary of the initial survey.

3.18 It is usual / common practice that additional monitoring and reporting is carried out on the first anniversary of the initial survey.

3.19 Monitoring and review should also relate to retirement dwelling residents and staff of the care home and community hub as well as residents of the proposed 'general' housing.

3.20 In summary, the levels of sustainable travel available to the site are not considered to be as good as the Travel Plan would suggest. The Travel Plan should apply to all users that travel to and from the site, not just residents of the proposed 'general' housing.

4.0 FRAMEWORK CONSTRUCTION TRAFFIC MANAGEMENT PLAN

4.1 A Framework Construction Traffic Management Plan sets out initial details of how construction traffic for a development will be managed so as to ensure that the impact of construction work on local residents, other sensitive receptors and the immediate highway is kept to a minimum and that appropriate controls are identified should they be necessary. The applicant sets out that as the construction phase of the development has not, at this point, been finalised, details provide should be considered as interim.

Chapter 2. Construction Site Location

4.2 Chapter 2 of the Framework Construction Traffic Management Plan is an extract of the Existing Transport Network chapter of the Transport Statement. No additional information is provided as to the suitability of the local road network to accommodate construction traffic.

4.3 As such the comments provided earlier in this Independent Highways Assessment are equally applicable, as reproduced below.

4.4 Para 2.5 of the Framework Construction Traffic Management Plan sets out that Lodge Lane is circa 4.8m wide. It does not mention that the road is largely provided in a 'cutting / gulley' with steep banks rising on either side and that vegetation / soil encroaches on either side of the tarmac surface – all of which would reduce the effective width of the road. Para 2.5 also does not mention that Lodge Lane has sections of considerable gradient of up to 9% (1:11) which could pose safety issues for large construction vehicles and / or in icy conditions.

4.5 Para 2.5 of the Framework Construction Traffic Management Plan also sets out that Burtons Lane is partially lit and provided with footways. Assessment of the section of Burtons Lane adjacent to the site and north to the A404 (a distance of circa 630m) reveal there are just 2 lamp columns. As such during hours of darkness the majority of the footway to the north would be unlit.

Chapter 4. Work and Programme

4.6 While it is acknowledged that the construction phase of the development has not, at this point, been finalised, the Work and Programme section of the Framework Construction Traffic Management Plan should provide some information of the phases of construction, what tasks would be carried out in each phase and the number and type of construction vehicles likely to visit the site for each task / phase. As discussed below, routeing of construction vehicles to / from the site over the 5 year project duration will include the A404 Chalfont Station Road, which is already subject to congestion, particularly adjacent to the village's main shopping area on Chenies Parade. Some level of detail of these matters should have been provided at this stage to allow planning / highways officers and local residents to assess the general impact of construction traffic on local roads, residents and amenity.

4.7 Further to the point above regarding the lack of information on the number of construction vehicles likely to visit the site and impact on the A404 Chalfont Station Road adjacent to Chenies Parade, it should also be considered that construction workers are likely to visit the village's main shopping area during the day to purchase food / beverages, which will generate additional vehicle trips and increase parking demand to the detriment of existing visitors to and residents of the village.

Chapter 5. Traffic and Transport

4.8 A number of the 'Initiatives to Minimise Travel' would not in reality appear to be credible measures to reduce travel. Construction workers are unlikely to travel by public transport and it is likely that unlimited construction worker parking will be accommodated on site.

4.9 The type of construction vehicles that will visit the site will be more extensive than shown with heavy plant, low-loaders and mobile cranes likely to also require access. Given that the primary construction route access is subject to a 3.96m height restriction, vehicle details should have included vehicle heights.

4.10 HGV deliveries should avoid periods when children are travelling to and from local schools. Para 5.8 of the Framework Construction Traffic Management Plan sets out that the morning period of 07:00 to 09:00 will be avoided, but the afternoon HGV ban period of 16:00-19:00 does not cover the end of the day for local schools. For example, Dr Challoner's High School where the school day ends at 15:35.

4.11 Road sweeping to keep the highway adjacent to the site access clear of mud and debris should be carried out as a matter of course and not at the request of Buckinghamshire Council.

4.12 It is stated that '*All HGV construction traffic will be instructed to access the site via the A404 from the A413 Amersham bypass and junction 18 of the M25 at Chorleywood… All deliveries will use Lodge Lane except for the occasional delivery over 13 feet in height which will access the site from Burtons Lane*.'

4.13 From this statement it appears that the primary construction site access will be via Lodge Lane, which as discussed above is a narrow, steep road with a low railway bridge, steep embankments on either side and which is not part of the local winter gritting network.

4.14 As there are no details, even preliminary, as to the number and heights of construction vehicles that will visit the site, it is not possible to assess how many vehicles may be required to travel via Burtons Lane. No details are provided of measures to ensure that over-height vehicles do not attempt to access the site via Lodge Lane which could lead to Lodge Lane being blocked or damage to the railway bridge. No details have been provided to suggest that Network Rail have been informed of the construction proposals.

Chapter 7. Monitoring Vehicle Movements

4.15 The Monitoring Strategy section of the Framework Construction Traffic Management Plan sets out that '*the number of vehicles visiting the site will be low*'. This statement is questioned as the scale of the proposed development is considerable. Previously with the Framework Construction Traffic Management Plan it was stated that details such as this were not known at this time.

4.16 In summary, it is considered that even at this early stage, the Framework Construction Traffic Management Plan should contain a greater level of detail for the proposed scheme such than an informed decision can be taken by highways / planning officers. The provision of detailed construction information should not wholly be deferred to post consent condition discharge.

5.0 SUMMARY & CONCLUSIONS

5.1 The proposed development of Little Chalfont Golf Club, Lodge Lane and adjacent land to the south including Homestead, Burtons Lane, Little Chalfont, Buckinghamshire, HP8 4AJ would provide 380 residential units (Use Class C3), up to 100 Bed Retirement Living (Use Class C2), up 60 Bed Care Home (Use Class C2), land safeguarding for a 1FE primary school and nursery, up to 1,000m² community hub and associated infrastructure delivery including road, cycle, landscaping, reprofiling and bridge link to Oakington Avenue.

5.2 Assessment of the Transport Statement submitted in support of the application concludes that the site has limited access to sustainable transport with a poor levels of local bus services, pedestrian links that are not lit during hours of darkness and rail services that are at an extended walk distance. In addition, analysis of personal injury accident data has not considered the most recent 5 year period and has not fully assessed pedestrian and cyclist injury accidents.

5.3 Access to the site at both proposed locations are likely to be unviable as they have sightline issues. Lodge Lane and Burtons Lane are also problematic due to narrow road widths and questionable benefits of road widening. In addition, required Road Safety Auditing has not been carried out / reported.

5.4 The impact of anticipated increases in vehicular activity cannot be fully assessed as questions remain over trip generation forecasts, the assignment / distribution of these to the local road network, and the over estimation of the use of sustainable modes of transport. A series of thorough / robust Travel Plans would be required across all proposed land uses, not just residential, to achieve a reduction in car based trips.

5.5 The Framework Construction Traffic Management Plan should contain a greater level of detail for the proposed scheme such than an informed decision can be taken by highways / planning officers. This should include an assessment of the impact of construction traffic on the village centre which is already subject to congestion and parking issues. The provision of detailed construction information should not wholly be deferred to post consent condition discharge.

5.6 In conclusion, the proposed development should not be permitted on highways grounds.