

THE BUDBROOKE PARISH COUNCIL OBJECTS TO THE PROPOSED INCREASE FROM 115 DWELLINGS TO 131 DWELLING AS CONTAINED IN PLANNING APPLICATION W/18/1811. THE REASONS FOR THIS ARE SET OUT BELOW.

The Council accepts that the applicant has made some adjustments to the previous application W/17/2387 however these will not significantly improve the impact on local roads.

The revisions have taken a computer model analysis of the development's impact rather than using on the ground counts or manual classified counts<sup>1</sup> or have ignored what are significant crucial hazards and issues:

1. the increasing volumes of traffic using the outside roads
2. the increasing volumes of home delivery services
3. the substantial chaos at 'rush hours' around the centre of Hampton Magna where all the key services are located and where the single road from the site joins, as its exit point on to Cherry Lane/Slade Hill
4. the potential loss of any bus service through Hampton Magna.

### **Traffic Impact**

*"It is a DUTY OF LOCAL AUTHORITIES TO PROMOTE ROAD SAFETY, including the dissemination of information and advice relating to the use of roads, the construction improvement, maintenance or repair of roads for which they are the highway authority and other measures taken in the exercise of their powers for controlling protecting or assisting the movement of traffic on roads."*

*"Quiet Lanes are minor rural roads, typically C or unclassified routes, which have been designated by local highway authorities to pay special attention to the needs of walkers, cyclists, horse riders and other vulnerable road users, and to offer protection from speeding traffic. Cars are not banned from Quiet Lanes and the use of Quiet Lanes is shared. Measures such as lower speed limits and discrete road signs aim to encourage drivers to slow down and be considerate to more vulnerable users who can in turn use and enjoy country lanes in greater safety, with less threat from speeding traffic."*

From this we understand that the road network though Hampton Magna and Hampton on the Hill is defined as rural road as it is outside any urban area with a population of more than 10,000.

Warwickshire County Council's Strategic Transport Policy focuses on M40, A46 and A roads off the M40 Junction 15 in the immediate vicinity of this proposal. Other nearby major roads may form part of the policy, however A4177 is not given any significant importance in this policy. The policy emphasises the need for ways of reducing the impact of high volumes of traffic through car sharing, public transport, cycling and walking. Although this is to be encouraged it is felt that this will do very little to reduce traffic volumes to any meaningful extent. Richborough Estates say <sup>2</sup> "an appropriate (5 year target) for the site is likely to be a reduction in peak hour single-driver trips of 5% ... to be transferred to other modes" if certain measures are

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<sup>1</sup> The Council finds it strange that these counts undertaken by PTB on the behalf of the developers were not noticed by parishioners who were the first to ask about the counts undertaken for the Parish Council. People seen counting cars at junctions would have raised questions. Nevertheless, forecasts for Warwick Parkway have no direct impact in Hampton Magna. Greater use of Parkway would obviously generate more traffic on local roads.

<sup>2</sup> Travel Plan Targets. Section 5.2.2.

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encouraged. Even this is regarded as a difficult to achieve. However, this will do very little to alleviate traffic volumes and resulting congestion.

Birmingham Road, A4177, is of significance when considering the developments at

- H28, north of Birmingham Road at Hatton which will have an access point from the A4177 into the site during and after completion of building
- For JLR developments at Fen End, Kenilworth and at Gaydon, both substantial and growing economic centres the shortest route by A4177 to Stanks Roundabout then via the A46 to M40. Alternative routes suggested take drivers through the centre of Kenilworth and/or Leamington. When both sites are fully operational the A4177 take more traffic, exacerbating issues relating to Hatton Park and Hampton Magna developments so should be considered now as part of a more detailed investigation.
- Old Budbrooke Road is the only access road to Hampton Magna.
  - Two proposed developments are sited on the edge of the village and a total of 245 dwellings in the WDC Local Plan, will then have access to Old Budbrooke Road via internal roads. All entry and egress to Hampton Magna is via three roads off Old Budbrooke Road.
  - H51 development currently subject of planning application W/17/2387 for 147 dwellings, which is 28% greater the 115 in WDC Local Plan, will access Hampton Magna in Daly Avenue and all traffic enters Cherry Lane via Woodway Avenue, then on to Old Budbrooke Road.
  - H27 development, for which planning applications have yet to be submitted for a WDC Local Plan proposal for 130 dwellings, if the developer has the same designs at that for H51 then that could be an additional 36 dwellings, i.e. 166. Access to this site is via Arras Boulevard and then to Old Budbrooke Road.
  - For simplicity, the names of other internal roads that will be directly affected have been omitted although there will be no less impact.
  - The worst-case scenario would see over 300 additional dwellings, just under 50% increase in dwellings. There are currently some 618 dwellings in HM, and by extension, occupants, cars, cycles, walkers whose safety needs to be properly addressed.
- It would be a lack of judgement not to consider the overall impact of these three sites that are within two miles of each other and with a substantial impact on not only the Birmingham Road, A4177, but also the A4189, Henley Road, and minor roads that are used as short cuts between dwellings and schools Hatton Park, Hampton Magna, Chase Meadow (on the edge of Warwick) and the Henley Road and Watery Lane to the M40 Junction 15 roundabouts. It is our contention that when such impact is adequately considered it will show the proposed increase in dwellings from 115 to 147 dwellings is not sustainable.

### **Issues and actions**

Speeding, the volume of traffic and parking by the school have been key issues for the parish council over many years and as such have been addressed as far as possible with the appropriate Authority, with limited effectiveness.

**In October 1999**, WCC conducted a number count of traffic using Old Budbrooke Road. The location of the counters was between the railway bridge and the first entry into Hampton Magna at Blandford way. This was prior to the building of the station and subsequent changes to roads and traffic management. The count shows average peak time numbers

- northbound weekday count was 272 in the morning (8:15 – 9:15) and 152 in the afternoon, identified at five different times between 15:30 and 17:30.

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- southbound weekday count was 217 in the morning (8:00 – 9:00) and 367 in the afternoon (17:15 – 18:15)

For clarification, this was only traffic travelling between the Birmingham Road and Blandford Way junctions. The total weekday through traffic averaged 2,025 northbound and 2,357 southbound daily.

**In 2004**, WCC undertook a traffic survey for the Parish Council at several points through Hampton on the Hill and along Old Budbrooke Road. All north/southbound traffic passed through a single traffic count point. The total weekday count at that point averaged 2615 northbound and 2170 southbound daily. Further analysis of these figures<sup>3</sup> show that vehicles entering the Hampton Magna estate was 1479 per day with 50% taking place at peak hours.

This 2004 analysis shows traffic flows as follows:

- northbound day count as approximately 935 in the morning and 1235 in the afternoon
- southbound day count as approximately 710 in the morning and 1905 in the afternoon.
- Northbound traffic was that going towards Hampton Magna, Warwick Parkway Station and Hatton Park, Birmingham Road from Chase Meadow, West Warwick, M40 Junction 15 roundabouts or Henley in Arden.

**In 2009** while assessing priorities for the Budbrooke Parish Plan, traffic issues were identified, by a survey of residents, as being one of the most significant impacts. The document states "The parish council recognise the importance and impact of high volume of traffic on local roads; 91% respondents mentioned this. The PC will continue to address routine issues as they arise."

**In 2012** a new multi-storey car park doubled the available spaces at Warwick Parkway Station to 959 spaces, an increase of 116%, since it opened in October 2000. This would suggest a proportional peak time increase in traffic to the station, and therefore along Old Budbrooke Road the only access to the station. Much of this traffic does not come directly off the A4177, Birmingham Road but from the South West via minor rural roads.

**In September 2015**<sup>4</sup>, a traffic count was made in Hampton on the Hill, as part of a speed check for traffic management, which provided the following data:

- northbound day count as approximately 358 in the morning and 726 in the afternoon
- southbound day count as approximately 425 in the morning and 708 in the afternoon.

Average Daily vehicle movements on Old Budbrooke Road					
Year	Northbound	Southbound	Total	change	location
1999	2025	2357	4382		Between parkway & HM
2004	2615	2170	4785	+ 9.2%	Between parkway & HM
2015	1205	1138	2343		At entry to and from HOTH only <sup>5</sup>

<sup>3</sup> Figures are taken from complex lists based on averages in quarter hour periods over several days, week beginning June 7<sup>th</sup>, 2004. Also, Longbridge Island had road works. [summary of traffic ppt]

<sup>4</sup> Traffic Analysis by NDC dated 18<sup>th</sup> – 24<sup>th</sup> September 2015.

<sup>5</sup> North bound traffic was that going towards Hampton Magna, Warwick Parkway Station and Hatton Park, Birmingham Road from Chase Meadow, West Warwick, M40 Junction 15 roundabouts or Henley in Arden. Southbound traffic was that going towards HOTH and points beyond.

**In September 2018**, the 2015 traffic count was replicated using counters in the same locations as previously. The overall difference was that traffic volumes had increased substantially [by 24.4%] between the two dates and through traffic was predominantly between the hours of 8 am and 10 am and again 3 pm and 6 pm; volumes were similar in both directions reaching over 20,000 per week.

Extrapolating from the 2015 and the 2004 counts, some 50% of traffic along Old Budbrooke Road at the Blandford Way counter is vehicles from or to Hampton Magna. This is a rough figure as there is no count of traffic crossing from Hatton Park to Hampton Magna, and there are a significant number of school run vehicles.

#### Mitigation attempts

The Budbrooke Neighbourhood Development Plan (BNDP) was adopted on 16<sup>th</sup> July 2018. The largest single issue identified by residents was that such developments "would increase traffic pollution, village atmosphere, busier more dangerous with more cars pre and post development". So strong was residents concern that the BNDP explains that

*"The residents and the Sub-Group have concerns in relation to the highway network in the Parish and its inability to cope with the current demand and future planned growth. The current limited number of routes in to and out of the Parish are already subject to lengthy delays during rush hours, particularly in the morning. In addition, there were concerns raised about traffic speeds and, further increases in volumes and parking issues generated by Warwick Parkway. Therefore:*

- a) The safety of all roads users will not be compromised*
- b) There will be no demonstrable adverse impact on the capacity and operation of the local highway network*
- c) There is adequate off-road parking to serve the development in accordance with Policy D*
- d) There is safe access, egress and appropriate visibility to serve the development and*

*e) Existing on-street parking problems are not exacerbated by the development."*

Policy BNDP9 - Traffic Management and Transport Improvements – identifies these issues and embeds them into local planning guidance.

#### Current Vehicle ownership and usage

A sign of its rural nature, Budbrooke residents depend more on cars and vans than elsewhere, with **92.5%** of households having access to one or more vehicles, compared to 81.5% in Warwick District and 74.2% across England. Therefore, any assessment of traffic impacts must take this into account.

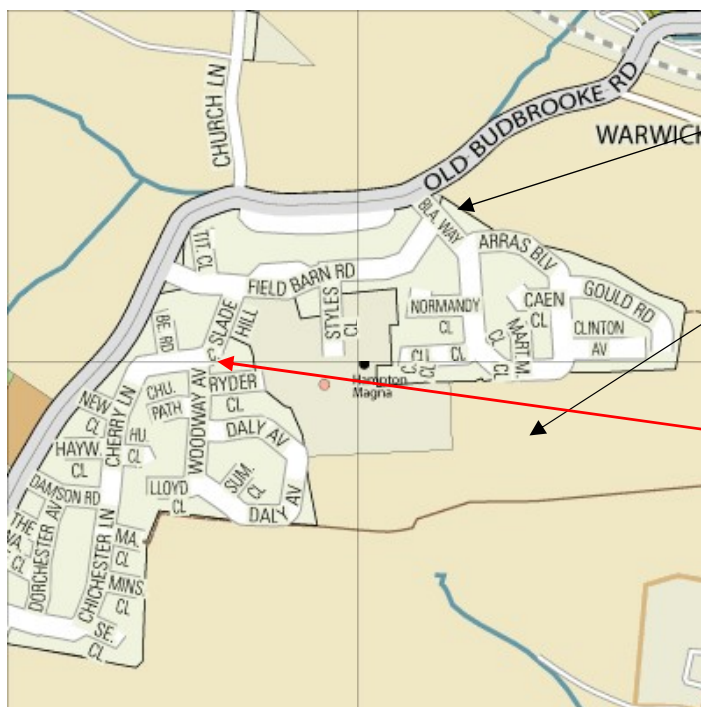
The Council rejects the idea that the issues arising from one development should be taken as a stand-alone matter, especially as with traffic the issue is clearly compounded by each other. Here we have three sites identified in the Local Plan all of which will have some impact on Budbrooke.

The site at Hatton Park abuts the parish and new residents will likely have cause to use local roads to access services like the school, shops and doctors, as well as using them as short cuts to M40 or Warwick avoiding Stanks Roundabout.

A second site off Arras Boulevard will impact more as it will feed on to Hampton Magna estate roads directly. The net result could be three times the impact of this one site, so every point made here will need addressing appropriately.

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Daly Avenue/Woodway Avenue<sup>6/7</sup>



Pinch points for internal traffic will be Blandford Way in respect of H27 as currently expected on Arras Boulevard

And in respect of H51 will be the junction of Woodway Avenue with Cherry Lane and Slade Hill.

	No properties	x ACPD (1.72) [w1.35]	X AC - TTW (.63)	ratio	Cum <sup>8</sup> ratio
currently	108 <sup>9</sup>	186	117	1	1
New lower	115	198	124	1.06	2.06
New upper	131	225	142	1.21	2.21

- Hampton Magna is defined as a rural road network; in 2017, traffic on such roads had increased nationally by 2.0%, 14.7% and 24.5% compared to 2016, 2012 and 1997 respectively. Rural traffic increases were the highest proportionally across all road types other than motorways.<sup>10</sup>
- In rural areas, 73.4% of workers travel by car (whether as driver or passenger).<sup>11</sup>
- 68.7% of rural workers drive a car to get to their place of employment.
- 63% - 72% is the percentage of 16- to 74-year-olds in work travelling to work by car/van
- WCC's Standard Resident Trip Rates are unsuitable for this sort of rural development. If, when applying these to an existing development, there is such an inconsistency then they are not fit for purpose.

<sup>6</sup> The traffic count undertaken by Richborough Estates only counted vehicles passing either side of the site entrance shown in drawings and extrapolated these findings giving a totally fictional picture.

<sup>7</sup> Data sources for this table are: ACPD = average cars per dwelling [Budbrooke ONS 2011], AC-TTW = average car commutes per dwelling [Warwick DC] and 25% more cars per dwelling than Warwick District ONS 2011. Ratios are the proportional increase in vehicles then cumulative ration shows that even with 115 dwellings the volume of traffic at pinch points will double.

<sup>8</sup> Taking the current number of properties, and increasing the ratio in proportion to the projected additional numbers

<sup>9</sup> This is the sum of all properties in Daly Avenue, Woodway Avenue, Lloyd Close, Rider Close and Church Path.

<sup>10</sup> National Traffic Surveys

<sup>11</sup> RAC Foundation 2013

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- Surveys undertaken by Richborough Estates were insufficient largely being by observation only with little or no independent hard data, and no assessment was made of the impact of additional traffic on the internal flows.
- The roads in Hampton Magna are over 50 years old and were built as estate roads taking small amounts of internal traffic. Technical specifications have changed in which case, taking the argument above showing that realistically more vehicles than are suggested in the Richborough Estates design brief will use these roads.
- Ryder Close by the H51 pinch point, along with adjoining roads, is dangerous at school run times. If nothing is done to remedy this potential increased hazard, the council will be ignoring its duty of care to road users.

WCC has considered the H51 site and declared the need for two access points. The same argument is likely to be put for H27 when permission is sought as the site has very similar logistics.

### **Related Matters**

- Within the last two years a twice hourly bus route was reduced to hourly. Part of this was due to low levels of use, however, the route and the timetable meant, and still means, it cannot be relied on by
  1. the majority of potential users as a commuter service into Leamington Spa, the larger commercial centre from Hatton Park or Hampton Magna, including both new developments.
  2. the elderly for hospital appointments etc.; with a growing elderly population this would mean social isolation or exclusion.
  3. This service has given notice that it will cease in January 2019 as funding will have ended by then.
- In addition, with Warwickshire County Council having reduced rural bus services by 20% over the last few years, any likelihood of having a better more appropriate service is highly unlikely and makes a nonsense of WCC Transport Policy in this respect.
- WCC Highways developments along the Birmingham Road into Warwick from the A46/A4177 roundabout include a cycle path. However, for Hampton Magna residents a far more appropriate route taking cyclists off the main road and routing the path alongside the Grand Union Canal and under the A46 is not being considered.
- The same route would be suitable for pedestrians, too. However, some discussions with the Canal and River Trust would be needed. CRT have responded and as the canal is a benefit to tourists, might take kindly to this suggestion.
- All vehicles travelling southbound along Old Budbrooke Road out of Hampton Magna will go through Hampton on the Hill (HOTH). The main road through the village is single carriageway with a narrow pavement on one side only. Few properties have parking spaces. Traffic Management and speed reduction schemes have had limited effect but are in place. In 2015, over 2,600 vehicles a day (5-day average) travelled through. The three additional developments will have a proportional impact here too. Also as increased traffic result in more congestion Northbound then some Northbound traffic will head Southbound to HOTH to avoid it. It will then meet other traffic heading Northbound from HOTH causing further congestion at HOTH thus resulting in additional delays. This has not been addressed nor adequately assessed and is another reason why any proposed increase in dwellings should not be permitted.

### **Possible Mitigation**

Public concern about the traffic is substantial and some objectors argue that there should be no new development at all at the locations. The Parish Council must accept that there should be development but insists that it must be at the levels no greater than set out in the WDC Local Plan and that WDC should not approve plans for any increase in excess of this. If the development remains at 115 then some mitigation may be possible of the type included in the BNDP. However, and this should not be interpreted that increased numbers are acceptable with mitigation.

### **Haulage Road**

Richborough Estates have stated in their Planning Statement, paragraph 6.18 that *"Access for construction traffic and deliveries can be accommodated along the existing highway network. As evidenced by the bus service, the existing roads are wide enough to enable lorries to gain access to the site even if cars are parked."* This approach is flawed as there is no meaningful comparison between occasional bus journeys and frequent heavy lorry trips that will be needed for construction purposes. Such journeys are likely to result in damage to roads and cause air pollution, noise and safety problems. Restrictions on travel times will not solve such problems.

Richborough Estates have publicly stated there is an option to construct a haul route that takes construction traffic directly from the Henley Road to H51, if considered necessary by the Highway Authority. The Parish Council believes this is an obvious solution especially if it could be used for the H27 development and request that the Highways authority support such a road and that it be made a pre-condition for work to commence. This consideration has disappeared from the table suggesting to the Council that it was never really a possibility at all, just a sales pitch.

This would take a substantial amount of construction traffic from the internal roads until completion. The Council would however recommend that this is a temporary measure only. A permanent road could have a significant impact as a rat run avoiding Warwick town centre, but a cycle route might be considered as an appropriate legacy that fits with the travel and transport plan. However, if a suitable traffic engineering solution was available to reduce the risk of it becoming a rat-run, its retention as a permanent road would be considered.

### **Two access points**

WCC Highways department want two entrances to the H51 development. It is likely that the same will be expected of H27 when it is considered. The Parish Council suggests that if the two sites are joined then developers might meet this requirement but it will still result in increased congestion within the village and access routes to and from the village. Another possible solution suggested is that there should be 2 access roads to and from the Henley Road/A4189 which allow exit and entry only to the new sites. This would prevent access through the village from the new sites, thereby avoiding increased congestion and would also encourage walking/cycling from the sites to and from the village. It would also prohibit a "rat run" from developing.

The latest site plan shows a possible emergency access to the site which would address the County Council's requirement on access for emergency vehicles. However, the idea of having an access point at Mayne Close drew substantial laughter at a Parish Council Meeting. At this point, Mayne Close has a public footpath, as shown on the Plan, but pedestrians can climb the steps. The drop is over 2 metres. The idea is a farce.

### **Summary of Objections and proposals**

1. The internal road network of Hampton Magna as it stands is inadequate and should be upgraded and or re-managed to address the increased volume of

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traffic issues.

2. Budbrooke Parish Development Plan was made on 16<sup>th</sup> July 2018
3. The Parish Council has specific concerns about the safety of its residents and school pupils at the Cherry Lane/Slade Hill/Field Barn Road bottleneck
4. Insufficient notice has been taken of BNDP9, in particular
  - a. The safety of all road users will not be compromised;
  - b. There will be no demonstrable adverse impact on the capacity and operation of the local highway network that are not outweighed by other benefits of the development;
5. Traffic flow and volumes at peak times will be considerably higher than those in the developer's transport analysis. Consideration should be given to having a condition imposed on the site that there is adequate mitigation of potential speed and driver stress by working with the Highway Authority in creating a 20-mph zone through Hampton Magna, including cushions or humps.
6. Additional through traffic in Hampton Magna, Hampton on the Hill and on other roads leading to H51 will exceed levels that required for a safe neighbourhood.
7. Therefore,
  - a. A temporary haulage road for construction traffic should be made a pre-condition to the development to overcome the adverse affect of such traffic through Hampton Magna and Hampton on the Hill, or
  - b. using a Construction Impacts and construction management scheme traffic
    - i. ban of all heavy construction vehicles through Hampton on the Hill for the duration of the construction or
    - ii. restricting the timing of delivery vehicles through Hampton Magna and Hampton on the Hill, there should be 'no delivery' periods at 08.00 to 09.15 and 15.00 to 15.30, to limit potential traffic hazards at school start and leaving times.
  - c. or a combination of these
8. The Parish Council demands an independent traffic assessment covering the area from Hatton Park to Stanks Island and the roads from A4177 to Warwick Parkway and the A4189, i.e. Old Budbrooke Road, Ugly Bridge Road and the roads through Hampton on the Hill to the Henley Road to get a full picture and an assessment of potential transport and traffic volumes and travel patterns. The data from the internal traffic count this Council is planning would assist in this assessment.
9. The District Council should work with its partner councils to address the variety of significant traffic and transport matters raised above.
10. Similarly, insufficient notice has been taken of BNDP10, in particular
  - a. providing pavements and cycle paths enabling residents of all ages and abilities to walk, cycle or utilise mobility vehicles safely from their homes to connect with existing footways, where available, to gain access to village services and facilities;
  - b. providing where possible, and where funding and developer contributions allow, new pedestrian and cycle routes or improving existing village networks, including appropriate signage, to serve new development; for example, a foot/cycle bridge over the A46 to improve access to Warwick Town.
  - c. taking the opportunity to contribute to establishing or enhancing pedestrian and cycle routes through the villages and beyond.